

REPORT 4

EPS MR LTD ENVIRONMENTAL PERMIT VARIATION

SUMMARY ENVIRONMENTAL MANAGEMENT SYSTEM

Report Number 1469r4v1d0316

Commissioned by
EPS Materials Recovery Limited
Graigola Wharf
Kings Dock
Swansea SA1 8QT

Prepared by
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March 2016

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1 INTRODUCTION

EPS MR Ltd operates a scrap metal export facility at Swansea Docks. The operation principally involves the import of scrap metal and then export off-site for recovery. Some of the scrap requires shearing and size reduction to facilitate handling and transfer. Such an operation requires a Permit from Natural Resources Wales (NRW). The Permit held by EPS MR Ltd was issued on 8 November 2012 and is Standard Rules set No. SR2008No21_75kte Metal Recycling Site. One of the conditions of holding such a Permit is that a written environmental management system (EMS) must be in place once the site is operational.

EPS MR Ltd recently provided NRW with a copy of the EMS. This was issued following an Enforcement Notice issued by NRW. The Environmental Management System (EMS) is a structured system which, once implemented, helps an organisation to identify the environmental impacts resulting from its business activities. It also helps manage and reduce those impacts, so that the environmental performance of the organisation is improved. An EMS should provide a methodical approach to planning, implementing and reviewing an organisation's environmental management. The EMS must set out in detail, how all the activities relating to the Permit, and specifically waste management and pollution control will be managed.

At this stage of the application process, NRW typically requires a summary of the management system. However, Appendix 1 is a full draft copy of the EMS prepared by TEP that will ultimately be implemented at the site. EPS MR would welcome feedback on this version.

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**EPS MR LTD
ENVIRONMENTAL
PERMIT VARIATION**

**SUMMARY
ENVIRONMENTAL
MANAGEMENT SYSTEM**

**Appendix 1
Draft EMS**

Report Number 1469r4v1d0316



EPS Materials Recovery Ltd
ENVIRONMENTAL MANAGEMENT SYSTEM

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Environmental Management System

Metal Recycling Facility

Standard Environmental Permit

PERMIT NUMBER EPR/JB3135RA/T001

Waste Exemption

PERMIT NUMBER EPR/AF0132VC/A001

Graigola Wharf

Kings Dock

Swansea

SA1 8QT

Document Revision

Version	Date	Author	Checked / App'd	Revision
DRAFT	11/01/16	SW	AS	FOR APPROVAL
1.0	22/01/16	SW	AS	RELEASE VERSION FOR REVIEW BY NRW
1.1	19/02/16	SW	AS	MSP AND SITE DRAWINGS UPDATED FOLLOWING NRW FEEDBACK
1.2	20/02/16	SW	AS	UPDATE FOR PERMIT VARIATION



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Manuals, Policies and Plans	Last Review Date	Next Review (Latest)
MPP1 Environmental Policy	22nd January 2016	21st January 2017
MPP2 Environmental Impacts and Controls	22nd January 2016	21st January 2017
MPP3 Environmental Management System Plan	20 th February 2016	19 th February 2017
MPP4 Accident/Pollution Incident Plan A – Site Plan B – Key Site and Emergency Contacts C – List of Substances and Storage Facilities D – Preventing Accidents and what to do if they happen	20 th February 2016	19 th February 2017
MPP5 Site Drawings and Plans Drawing 10934-000-A Site Location and Surroundings Drawing 10934-000-B Permitted Area Drawing 10934-000-C Block Plan Drawing 10934-000-D Drainage Plan Drawing 10934-000-E Storage Plan Drawing 10934-000-F Services Plan Drawing 10934-000-G Receptor Plan Drawing 10934-000-H Emergency Plan Drawing 10934-000-I Process Flowchart	20 th February 2016	19 th February 2017

Procedures	Last Review Date	Next Review (Latest)
PR1 - Accident/Pollution Incident Procedure	22nd January 2016	21st January 2017
PR2 - Emergency Incidence Procedure – Fire & Explosion	22nd January 2016	21st January 2017
PR3 - Emergency Incidence Procedure – Spillage	22nd January 2016	21st January 2017
PR4 - Emergency Incidence Procedure – Flood	22nd January 2016	21st January 2017
PR5 - Emergency Incidence Procedure – Air Emissions	22nd January 2016	21st January 2017
PR6 - Emergency Incidence Procedure – Discovery of Suspicious Items	22nd January 2016	21st January 2017
PR7 – Waste Acceptance Procedure	22nd January 2016	21st January 2017
PR8 - Procedure for Assessment and Implementation of Training Needs, Competence and Awareness	22nd January 2016	21st January 2017
PR9 – Maintenance Procedure	22nd January 2016	21st January 2017
PR10 – Procedure for Recording of Staff Responsibilities	22nd January 2016	21st January 2017
PR11 – Procedure for Recording and Reporting of Environmental Incidents	22nd January 2016	21st January 2017
PR12 – Complaints Procedure	22nd January 2016	21st January 2017



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Forms and Records	Last Review Date	Next Review (Latest)
FR1 Site Inspection Record	22nd January 2016	21st January 2017
FR2 Complaint Record	22nd January 2016	21st January 2017
FR3 Plant and Equipment Inventory	22nd January 2016	21st January 2017
FR4 Maintenance, Service, Calibration Schedule	22nd January 2016	21st January 2017
FR5 Maintenance Record	22nd January 2016	21st January 2017
FR6 Training Checklist (Employee Competency Matrix)	22nd January 2016	21st January 2017
FR7 Training Record	22nd January 2016	21st January 2017
FR8 Roles and Responsibilities	22nd January 2016	21st January 2017
FR9 Environmental Accident (and Incident) Record	22nd January 2016	21st January 2017
FR10 Corrective Action Request	22nd January 2016	21st January 2017
FR11 Register of Waste Facilities	22nd January 2016	21st January 2017
FR12 Register of Legal and Other Requirements	22nd January 2016	21st January 2017

Rules and Other Information	Last Review Date	Next Review (Latest)
ROI1 Site Rules	22nd January 2016	21st January 2017
ROI2 Further Help	22nd January 2016	21st January 2017
ROI3 Protecting the Environment	22nd January 2016	21st January 2017

Risk Assessments	Last Review Date	Next Review (Latest)
RA1 Register of Risk Assessments	22nd January 2016	21st January 2017
RA2 Environmental Risk Assessments	22nd January 2016	21st January 2017



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Section Contents

Manuals, Policies and Plans

MPP1 Environmental Policy

MPP2 Environmental Impacts and Controls

MPP3 Environmental Management System Plan

MPP4 Accident/Pollution Incident Plan

A – Site Plan

B – Key Site and Emergency Contacts

C – List of Substances and Storage Facilities

D – Preventing Accidents and what to do if they happen

MPP5 Site Drawings and Plans

Drawing 10934-000-A Site Location and Surroundings

Drawing 10934-000-B Permitted Area

Drawing 10934-000-C Block Plan

Drawing 10934-000-D Drainage Plan

Drawing 10934-000-E Storage Plan

Drawing 10934-000-F Services Plan

Drawing 10934-000-G Receptor Plan

Drawing 10934-000-H Emergency Plan

Drawing 10934-000-I Process Flowchart



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MPP1 Environmental Policy

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MPP1 Environmental Policy

EPS Materials Recovery Ltd is one of the leading independent companies in the market sector of waste transfer and recycling. This statement recognises EPS Materials Recovery Ltd.'s commitment to the environment, continual improvement, prevention of pollution, and ISO14001 certification.

The company is committed to:

- Maintain an Environmental Management System, which provides the framework for setting and reviewing our Environmental Policy, Objectives and Targets and for monitoring and continually improving environmental performance.
- Meet and where appropriate exceed the requirements of relevant legislation, regulations, and other requirements.
- Implement procedures to detect and where possible prevent pollution through accidental emissions and effluent discharges.
- Monitor environmental aspects and apply appropriate control measures.
- Working with clients, sub-contractors, customers and third parties to minimise any environmental impact from day to day operations.
- Providing appropriate environmental training to its employees and communicating environmental issues to all employees on a regular basis.

The responsibility for determining the Company's policy on the Environment including revision of this Policy, lies with the Managing Director of EPS Materials Recovery Ltd.

This Policy will be reviewed no later than 12 months from the date below.

Signed For and on behalf of the Board of Directors

Adrian Stewart

Managing Director

Date: 1st March 2015



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MPP2 Environmental Impacts Plan and Controls

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Table 1

Site Activity:

The key pieces of environmental legislation affecting this sector are:

(Add as many as apply to your site activities – you should ensure that this list is kept up to date for your site and covers all applicable legislation)

- The Waste (England and Wales) Regulations 2011 (as amended by The Waste (England and Wales) (Amendment) Regulations 2012).
- Environmental Protection Act 1990
- Environmental Permitting (England and Wales) Regulations 2010 (SI 2010 No 675) (as amended by Explanatory Memorandum to Environmental Permitting (England and Wales) Regulations 2010, Environmental Permitting (England and Wales) (Amendment) Regulations 2010 (SI 2010 No 676), Environmental Permitting (England and Wales) (Amendment) (No. 2) Regulations 2010 (SI 2010 No 2172), Environmental Permitting (England and Wales) (Amendment) Regulations 2011 (SI 2011 No 2043),

- Environmental Permitting (England and Wales) (Amendment) (No 2) Regulations 2011 (SI 2011 No 2933), Environmental Permitting (England and Wales) (Amendment) Regulations 2013 (SI2013 No 390)
- Clean Neighbourhoods and Environment Act 2005
- Groundwater regulations 1998, SI 2746
- Water Resources Act 1991, as amended
- Hazardous Waste (England and Wales) Regulations 2005 as amended by Hazardous Waste (England and Wales) (Amendment) Regulations 2009)

REFER TO FR12 REGISTER OF LEGAL AND OTHER REQUIREMENTS FOR OTHER POTENTIALLY APPLICABLE LEGISLATION AND GUIDANCE

Process / Activity/Equipment	A	E	W	D	N	R	L	Process / Activity/Equipment	A	E	W	D	N	R	L
Processes / Activities / Equipment at your site: (H) high impact, or (M) medium impact, or (L) low impact in the box next to the process / activity / equipment if it can result in an environmental impact listed below under normal or abnormal operation.															
➤ Emissions to Air (including dust) - A															
➤ Energy Usage (e.g. electricity, gas, oil) - E															
➤ Emissions to Water - W															
➤ Waste Disposal - D															
➤ Nuisance (i.e. noise or odour) - N															
➤ Resource Consumption (e.g. water, chemicals, not energy) – R															
➤ Land Contamination - L															
Sorting	L	L	M	L	L	L	M	Grading	L	L	L	L	L	L	L
Baling	M	M	M	L	M	L	M	Storage	L	L	M	L	M	L	M
Bulking	L	L	M	L	M	L	M	End disposal	L	L	L	H	L	L	L
Compacting	L	M	M	L	M	L	M	Surface water drainage	L	L	M	L	L	L	M
Crushing	L	M	M	L	M	L	M	Vehicle and plant usage	M	M	M	L	H	M	M
Cutting	M	M	M	L	M	L	M	General business operations	M	M	L	M	L	M	L
Grinding	H	M	M	L	H	L	M								
Shearing	L	M	M	L	M	L	M								
Shredding	M	M	M	L	H	L	M								



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Table 2A. Emissions to Air [A]

Process / Activity / Equipment on Site	Potential Impact	Is impact controlled by equipment?	Is equipment included on maintenance checklist?	Is impact controlled by a procedure?	Person using the procedure received training?	Comments
Dust from baling, cutting, grinding, shredding	Potential for local air quality issues from dust. Also, a cause for complaints	No – fugitive emission from machinery movement	Yes	Yes – PR7/PR1	Yes – see training list	Waste acceptance procedure controls the presence of dust generating materials. Dust from baling minimal.
Air emissions from vehicle usage	Emissions of greenhouse gases	Yes	Yes	No	N/A	Manufacturer's standard equipment to meet EU engine emission controls. Vehicles maintained to ensure efficiency. Staff trained to consider impact of journeys, reducing mileage by journey planning, etc.



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Table 2B. Energy Usage [E]

Process / Activity / Equipment on Site	Potential Impact	Is impact controlled by equipment?	Is equipment included on maintenance checklist?	Is impact controlled by a procedure?	Person using the procedure received training?	Comments
Electricity usage for baling, cutting, grinding, shredding	The impacts associated with electricity production are well documented (e.g. air emissions from fossil fuels).	No	Not Applicable	No	N/A	Energy usage minimised by selecting low energy equipment where possible.
Fuel consumption by vehicles and plant	Use of finite natural resources. Greenhouse gas emissions from consumption of fossil fuels.	Yes	Yes	No	N/A	Engine emissions controlled by manufacturer to EU standards. Vehicles maintained to ensure efficiency. Journey planning for collections/deliveries.
Energy consumption by general operations e.g. electricity usage in offices, business travel, etc.	The impacts associated with electricity production are well documented (e.g. air emissions from fossil fuels). Use of finite natural resources. Greenhouse gas emissions from consumption of fossil fuels.	Yes – in part	Yes – PR9	No	N/A	Energy usage minimised by selecting low energy equipment where possible. Engine emissions controlled by manufacturer to EU standards. Vehicles maintained to ensure efficiency. Staff trained to consider impact of journeys, reducing mileage by journey planning, car sharing, etc.



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Table 2C. Emissions to Water [W]

Process / Activity / Equipment on Site	Potential Impact	Is impact controlled by equipment?	Is equipment included on maintenance checklist?	Is impact controlled by a procedure?	Person using the procedure received training?	Comments
Leaks and spills during processing or storage from: Vehicles ELV shells (not correctly depolluted) Engine blocks (not correctly depolluted)	Under normal conditions surface water run-off should be uncontaminated. However, if contamination occurs by accident, non-hazardous and hazardous liquids such as fuel, oils, etc. could spill or leak and enter drains with the potential to cause water pollution to coastal waters via run off to surface water drains.	Yes – Containment systems, spill kits, interceptors	Yes – see maintenance checklist	Yes – PR3/PR1/PR9	Yes – see training list	Storage in specific areas. Hazardous waste containers and tanks are banded to mitigate against leaks and are checked as part of the daily inspection. Storage in accordance with EMS Plan. Spill kits used (see below). Accidental contamination is considered in Accident / Incident Management Plan.
Surface Water Drainage	Surface water run-off from buildings, car parks and concrete hard standing. Surface water passes through interceptors before discharge.	Yes Interceptor operation	Yes – see maintenance checklist	Yes – PR1/PR1/PR9	Yes – see training list	Maintenance checklist to ensure continued effectiveness of drainage systems. Daily inspection of site drainage to confirm free from blockages. Accidental contamination is considered in Accident / Incident Management Plan.



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Table 2D. Waste Disposal [D]

Process / Activity / Equipment on Site	Potential Impact	Is impact controlled by equipment?	Is equipment included on maintenance checklist?	Is impact controlled by a procedure?	Person using the procedure received training?	Comments
Disposal of hazardous waste from sorting	Uncontrolled/illegal disposal leading to environmental pollution.	No	No	No	N/A	Hazardous waste controls/storage in accordance with EMS Plan. Chemicals, waste oils, fuels, etc. all handled in accordance with Hazardous Waste Legislation. Need to meet legal Duty of Care requirements. Disposal to licensed waste facilities only. Checks in place before transfer of waste. Waste hierarchy followed. Recovery chosen before landfill wherever possible.
Disposal of general non-recyclable waste from sorting (or general office activities)	Non-recyclable waste disposal has associated impacts e.g. ecotoxicity, global warming and nuisance e.g. odour.	No	Not applicable	No	N/A	Waste controls/storage in accordance with EMS Plan. Need to meet legal Duty of Care requirements. Disposal to licensed waste facilities only. Checks in place before transfer of waste. Waste hierarchy followed. Recovery chosen before landfill wherever possible. Skips and bins are labelled and staff are trained in the importance of separating and recycling as much of the waste on site as possible.



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Table 2E. Nuisance (e.g. Noise, Odour) [N]

Process / Activity / Equipment on Site	Potential Impact	Is impact controlled by equipment?	Is equipment included on maintenance checklist?	Is impact controlled by a procedure?	Person using the procedure received training?	Comments
Noise from baling, compacting, crushing, cutting, grinding, shearing shredding, vehicle and plant usage	Section III of the Environmental Protection Act 1990, noise can be classified as a statutory nuisance.	No	Not applicable	Yes – PR1	Yes – see training list	Site remote from non-industrial receptors. Industrial receptors also noise generating. Hours restricted.
Odour from waste storage or site operations e.g. refuelling, etc.	Section III of the Environmental Protection Act 1990, odour can be classified as a statutory nuisance.	No	Not applicable	Yes – PR1	Yes – see training list	Quantities potentially released are small. Odours not overly offensive compared with other wastes e.g. degrading food waste. Adequate ventilation used to disperse odour.
Litter from storage of non-recyclable waste	Air blown litter can cause a nuisance to nearby receptors.	No	Not applicable	Yes – PR1	Yes – see training list	Wastes not generally prone to becoming airborne/litter forming. Light wastes stored in containers. Site inspection and litter picking on a daily basis.
Odour from general site waste	Section III of the Environmental Protection Act 1990, odour can be classified as a statutory nuisance.	No	Not applicable	Yes – PR1	Yes – see training list	Management of waste in accordance with EMS Plan. Odour causing waste limited in quantity and generated from offices/staff welfare. Staff informed of importance of maintaining cleanliness of welfare area during induction training. General measures taken to reduce odour: good housekeeping, regular disposal of waste, etc.



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Table 2F. Resource Consumption (not energy) [R]

Process / Activity / Equipment on Site	Potential Impact	Is impact controlled by equipment?	Is equipment included on maintenance checklist?	Is impact controlled by a procedure?	Person using the procedure received training?	Comments
Use of chemicals	Harm to human health or escape to the local environment.	No	No	No	N/A	Management of hazardous substances according to COSHH and Hazardous Waste Regulations. Induction training, operating procedures and toolbox talks used to inform staff.
Use of water	Inefficient use results in natural resource depletion.	No	No	No	N/A	Staff informed of importance of resource efficiency during induction training and toolbox talks. General measures taken to reduce water usage e.g. turning taps off when not in use, reduced flush toilets, etc.
Use of fuel (vehicles and plant)	Inefficient use results in fossil fuel depletion and air emissions (see 2A).	No	No	No	N/A	Staff informed of importance of resource efficiency during induction training and toolbox talks. Vehicles maintained to ensure efficiency. Staff trained to consider impact of journeys, reducing mileage by journey planning, etc. Plant/vehicles replaced with more efficient equipment wherever practical.



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Table 2G. Land Contamination (e.g. storage of hazardous substances) [L]

Process / Activity / Equipment on Site	Potential Impact	Is impact controlled by equipment?	Is equipment included on maintenance checklist?	Is impact controlled by a procedure?	Person using the procedure received training?	Comments
Storage or spills of hazardous substances e.g. fuel, oil, batteries, etc.	Substances can cause harm to the ecotoxicity of the soil, and could leak into surface water or groundwater.	Yes –containment - drip trays, bunds, etc.	Yes – see maintenance checklist	Yes – PR3/PR1/PR9	Yes –see training list	Hazardous material stored in a bunded, impermeable area. Waste stored in appropriate containers and on correct surfaces in accordance with EMS Plan. Drip trays and other containment used. Spill kits available.



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Table 3. General Waste Management

Waste Produced at Site (<i>with EWC, if known</i>)	Where does the waste go?	Can it go to recovery / recycling?	Is it being stored correctly on site?	Are Duty of Care requirements being met?	Comments
Waste Metal (02 01 10)	Reprocessing	Yes	Requires corrective action – storage locations	Yes	
Ferrous metal filings and turnings (12 01 01)	Reprocessing	Yes	Requires corrective action – storage locations	Yes	
Non-ferrous metal filings and turnings (12 01 03)	Reprocessing	Yes	Requires corrective action – storage locations	Yes	
Metallic packaging (15 01 04)	Reprocessing	Yes	Requires corrective action – storage locations	Yes	
End-of-life vehicles containing neither liquids nor other hazardous components (16 01 06)	Reprocessing	Yes	Requires corrective action – storage locations	Yes	
Ferrous metal (16 01 17)	Reprocessing	Yes	Requires corrective action – storage locations	Yes	
Non-ferrous metal (16 01 18)	Reprocessing	Yes	Requires corrective action – storage locations	Yes	
Discarded components not otherwise specified (16 01 22)	Reprocessing	Yes	Requires corrective action – storage locations	Yes	
Lead batteries (16 06 01*)	None on-site	None on-site	N/A	Yes	
Copper, bronze, brass (17 04 01)	Reprocessing	Yes	Yes	Yes	
Aluminium (17 04 02)	Reprocessing	Yes	Requires corrective action – storage locations	Yes	
Lead (17 04 03)	Reprocessing	Yes	Yes	Yes	
Zinc (17 04 04)	Reprocessing	Yes	Yes	Yes	
Iron and steel (17 04 05)	Reprocessing	Yes	Requires corrective action – storage locations	Yes	
Tin (17 04 06)	Reprocessing	Yes	Requires corrective action – storage locations	Yes	



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Mixed metals (17 04 07)	Reprocessing	Yes	Requires corrective action – storage locations	Yes	
Cables other than those mentioned in 17 04 10 (17 04 11)	Reprocessing	Yes	Yes	Yes	
Ferrous materials removed from bottom ash (19 01 02)	Reprocessing	Yes	Yes	Yes	
Iron and steel waste (19 10 01)	Reprocessing	Yes	Requires corrective action – storage locations	Yes	
Non-ferrous waste (19 10 02)	Reprocessing	Yes	Requires corrective action – storage locations	Yes	
Ferrous metal (19 12 02)	Reprocessing	Yes	Requires corrective action – storage locations	Yes	
Non-ferrous metal (19 12 03)	Reprocessing	Yes	Requires corrective action – storage locations	Yes	
Batteries and accumulators included in 16 06 01, 16 06 02 or 16 06 03 and unsorted batteries and accumulators containing these batteries (consisting of lead batteries only) (20 01 33*)	None on-site	None on-site	N/A	Yes	
Metals (20 01 40)	Reprocessing	Yes	Requires corrective action – storage locations	Yes	
General waste (20 03 01)	Recovery	Yes	Yes	Yes	



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Table 4. List of Procedures (list procedures identified in Table 2A to 2G above, and any other procedures you have in addition)

Procedure Name	What process / activity / equipment does it relate to?	Where is the procedure kept?	Version Number	When was the procedure last reviewed?	Comments
PR1 - Accident/Pollution Incident Procedure	Accident/Pollution Incidents arising from any activity	Site office – control room file cabinet	1.0	22nd January 2016	
PR2 - Emergency Incident Procedure – Fire & Explosion	Fire or explosion arising from any activity	Site office – control room file cabinet	1.0	22nd January 2016	
PR3 - Emergency Incident Procedure – Spillage	Spillage arising from any activity	Site office – control room file cabinet	1.0	22nd January 2016	
PR4 - Emergency Incident Procedure – Flood	Flood incident	Site office – control room file cabinet	1.0	22nd January 2016	
PR5 - Emergency Incident Procedure – Air Emissions	Emissions arising from any activity	Site office – control room file cabinet	1.0	22nd January 2016	
PR6 - Emergency Incident Procedure – Discovery of Suspicious Items	Discovery of suspicious item during inspection and acceptance, or site inspections	Site office – control room file cabinet	1.0	22nd January 2016	
PR7 – Waste Acceptance Procedure	Acceptance of waste at the facility	Site office – control room file cabinet	1.0	22nd January 2016	
PR8 - Procedure for Assessment and Implementation of Training Needs, Competence and Awareness	Assessment of staff training needs and provision of training.	Site office – control room file cabinet	1.0	22nd January 2016	
PR9 – Maintenance Procedure	All site infrastructure including that used for processing and site drainage.	Site office – control room file cabinet	1.0	22nd January 2016	
PR10 – Procedure for Recording of Staff Responsibilities	Recording of staff responsibilities	Site office – control room file cabinet	1.0	22nd January 2016	
PR11 – Procedure for Recording and Reporting of Environmental Incidents	Recording and reporting of environmental incidents	Site office – control room file cabinet	1.0	22nd January 2016	
PR12 – Complaints Procedure	Recording, responsibilities and actions for dealing with complaints	Site office – control room file cabinet	1.0	22nd January 2016	



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MPP3 Environmental Management System Plan

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MPP3 Environmental Management System Plan

Metal Recycling Facility

Bespoke Environmental Permit

PERMIT NUMBER EPR/JB3135RA/T001

Kings Dock

Swansea

SA1 8QT

Document Revision

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1.0	22/01/16	SW	AS	RELEASE VERSION FOR REVIEW BY NRW
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1 INTRODUCTION

1.1 Purpose of this Document

This Management System Plan has been prepared by EPS Materials Recovery Ltd and is a component of a suite of documents that form the company's Environmental Management System for managing recycling activities at the facility known as EPS Materials Recovery Limited, Kings Dock, Swansea, SA1 8QT.

The Environmental Management System fulfils the requirements of the site's Environmental Permit by "providing a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances, closure and those drawn to the attention of the operator as a result of complaints". It describes the processes and operations undertaken at the facility, how they are managed and controlled to meet the requirements of the Environmental Permit and any associated best practices and guidance. In addition it provides systems and procedures to enable the company to operate in accordance with its Environmental Policy (**MPP1**).

This Management System Plan is considered a 'live' document and as such has been presented in a way which can be easily amended by adding to, or removing superseded information. Each change to the plan will be subject to Natural Resources Wales approval prior to insertion in the document. The plan presents the general engineering details of the site, along with proposed working arrangements, infrastructure, environmental controls, monitoring and site management procedures.

Reference is made throughout this document to processes and procedures within the EMS and in particular to a Corrective Action Response (CAR) Procedure which details how the company will deal with any deficiencies identified during a scheduled or unscheduled system audit/check or justified customer/resident/staff complaint. Where critical activities have been identified, the company has reviewed the processes and procedures that are in place with a view to meeting, and preferably exceeding any statutory obligations placed on them. Where current measures are deemed insufficient, the company will identify additional controls such as the introduction of documented procedures and work instructions, further training programmes and infrastructure improvements.

Within this EMS Plan, text highlighted in **Bold Blue** refers to documents that form part of the EMS.

1.2 Overview

This EMS Plan has been prepared to support the submission of an application to Natural Resources Wales to vary the existing Standard Rules Environmental Permit (Ref: EPR/JB3135RA/T001) to a bespoke environmental permit. This application increases the area of the currently permitted site and is accompanied by the surrender of Standard Rules Environmental Permit EPR/HB3932RS/A001 for the directly adjacent Wood Export Facility and the consolidation of a T9 Exemption (Ref: EPR/AF0132VC/A001) for the recovery of scrap metal.

This document considers the operation of a metal recycling facility and in compliance with the requirements of a bespoke Environmental Permit based on Standard Rules set SR2008No21, with bespoke elements relating to location (<500m from a designated site) and drainage (discharge to coastal waters as opposed to foul sewer or sump).

Operations undertaken at the site include the receipt, inspection and storage of waste ferrous and non-ferrous metal, cutting, grinding, shearing and baling for recovery.

The currently permitted operations may be observed as:

- Receipt, inspection and unloading of waste metal from transporter vehicles and transfer to storage using on-site plant;
- Cutting, grinding and shearing of waste metal to reduce its size;



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- Baling of waste metal to facilitate transport to recycling facilities;
- Loading and transfer of baled or loose metals into articulated or hooklift vehicles for dispatch to recycling facilities for recovery; and
- Loading and transfer of small volumes of residual waste into hooklift vehicles for dispatch to recycling facilities for recovery/disposal.

Waste operations are performed principally within designated areas within the large yard, or within site buildings (see drawings in the appendices) as appropriate.

To comply with the terms of the standard permit the following conditions should be met:

- Uncontaminated ferrous metal wastes or alloys and uncontaminated non-ferrous metal wastes should be stored on hardstanding or an impermeable surface.
- All other wastes should be stored on an impermeable surface with sealed drainage system.
- All wastes should be treated on an impermeable surface with sealed drainage system.
- Lead acid batteries are stored in containers with an impermeable, acid resistant base and a cover to prevent ingress of water.

The site is currently non-compliant with the above conditions. Furthermore the site is currently storing and treating waste outside of the permitted boundary. The Operator is taking steps to address non-compliance with its existing permit and is currently making short-term operational changes to reduce storage outside of the permitted area and sampling of surface water run-off with a view to using this data to design a new site drainage scheme.

Site areas not serviced by a sealed drainage system currently drain by infiltration. Proposals to improve the site's existing drainage by directing rainfall dependent surface run-off (which accumulates at the perimeter of the site) via drainage ditches and kerbs to two class 1 full retention interceptors to be located at the western end of the site are under discussion with Natural Resources Wales. This new drainage scheme (which is subject to detailed design following the conclusion of the aforementioned sampling of surface water run-off) as well as changes to surfaces used for treatment of waste are proposed in section 6.2.3. Once finalised, this EMS Plan will be updated to reflect any revisions to the drainage scheme and implemented to a schedule to be agreed with NRW.

The Operator will implement further measures necessary to ensure its future compliance with any conditions of a bespoke permit granted by NRW.

1.3 Compliance with Permit Requirements

Table 1 summarises the key requirements of the site's Environmental Permit and the sections of this EMS Plan or associated procedures that, when effectively implemented, will enable the site to comply with these requirements.

Licence Condition	Description	System Reference or Evidence of Compliance
1.1.1	General management	(a) Environmental Management system (b) Procedure PR8 and TCM Attendance
1.1.2	Records demonstrating compliance	Site Diary Archived Forms FR1 - FR11 Compliance Audits (Internal/External)
1.1.3	Permit copy	Copy on Staff Notice Board and in Weighbridge Office
1.1.4	Competence scheme	Procedure PR8 and copies of TCM qualifications



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1.2.1	Waste hierarchy	(a) and (b) Environmental Policy and EMS Plan 7.4 (c) EMS Plan 7.4
1.2.2	Review	EMS Plan 1.4
2.1.1	Permitted activities	EMS Plan 4.1 Compliance Audits (Internal/External)
2.2.1	Waste acceptance	EMS Plan 4.1
2.3.1	Operating techniques	EMS Plan 6.1
2.4.1	Site boundary	Drawing 10934-000-B in MPP5 Daily site inspections Compliance Audits (Internal/External)
2.4.2	Designated sites	EMS Plan 3.4
2.5.1	Technical Requirements	EMS Plan 7.6.3
3.1.1/3.1.2	Emissions	EMS Plan 8.1.2
3.1.3	Containment	EMS Plan 6.1/6.2/8.1.2.3
3.2.1/3.2.2	Odour	EMS Plan 8.1.2.10
3.3.1/3.3.2	Noise and Vibration	EMS Plan 8.1.2.4
4.1.1	Record keeping	EMS Plan 7.9/9
4.1.2	Maintaining records	EMS Plan 9
4.2.1/4.2.2	Reporting	EMS Plan 8.3
4.3.1/4.3.2	Notifications	EMS Plan 8.3.2
4.3.3	Monitoring or sampling	EMS Plan 8.1.1.2
4.3.4	Notifications	EMS Plan 8.3.2
4.4	Interpretation	EMS Plan 8.3.3

Table 1. Requirements of Permit

1.4 EMS Review

The Environmental Management System (including this EMS Plan) shall be reviewed annually to confirm whether changes are required to system and procedures.

1.5 Regulations and Guidance

Various guidance documents and statutory instruments have been used to produce this plan. These documents include:

- Environmental Permitting (England and Wales) Regulations 2010
- Environmental Permitting (England and Wales) (Amendment) Regulations 2010
- Environmental Permitting (England and Wales) (Amendment) Regulations 2010 (No. 2)

Environmental Permitting (England and Wales) (Amendment) Regulations 2011

- Environmental Permitting (England and Wales) (Amendment) (No 2) Regulations 2011
- Environmental Permitting (England and Wales) (Amendment) Regulations 2013
- Industrial Emissions (Integrated Pollution Prevention and Control) (Recast) 2010
- Environmental Permitting Guidance The IPPC Directive Part A(1) Installations and Part A(1) Mobile Plant, v3 March 2010
- Environment Protection Act 1990
- Clean Neighbourhoods and Environment Act 2005



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- Groundwater regulations 1998, SI 2746
- Water Resources Act 1991, as amended
- Hazardous Waste (England and Wales) Regulations 2005 as amended by Hazardous Waste (England and Wales) (Amendment) Regulations 2009
- Environmental Permitting Guidance -Core Guidance for the Environmental Permitting (England and Wales) Regulations 2010 – March 2013
- Getting The Basics Right – How to comply with your environmental permit June 2013
- Horizontal Guidance Note H1 Environmental Risk Assessments for Permits - Overview Document, v2.1 December 2011 and Annexes A to K.
- Horizontal Guidance Note H3 Part 2 - Noise Assessment and Control, v3 June 2004
- Horizontal Guidance Note H4 Odour Management, March 2011
- Horizontal Guidance - H6 Environmental Management Systems

Elements of this working plan also consider guidance from the following historic documents:

- Working Plan Guidance and Specification, Volume 1, 19 February 2000

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2 PERMIT DETAILS AND CONTACTS

2.1 Environmental Permit Number

EPR/JB3135RA/T001

2.2 Site Operator

The site Operator is:

EPS Materials Recovery Limited

Kings Dock

Swansea

BS11 0YB

Tel.: 01792 645101

Fax: 01792 470832

Email: Info@epswales.co.uk

2.3 Site Contacts

Company Director: Mr Richard Phillips

Mobile: 07836 337899

Email: mrj@epsmr.co.uk

Company Director: Mr Adrian Stewart

Mobile: 07774 903373

Email: adrian.stewart@epswales.co.uk

Technically Competent Person: Mr Adrian Stewart

Mobile: 07774 903373

Email: adrian.stewart@epswales.co.uk

Site Manager: Darren Stillman

Mobile: 07527 325336

Email: darren.stillman@epsmr.co.uk

Landowner: Associated British Ports

Tel: 0870 609 6699



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3 SITE DETAILS

3.1 Site Location

The facility is located on Kings Dock, a central location within Swansea Docks located approximately 2.6km east of Swansea city centre (OS Grid Reference SS 68161 92675). The location of the site is shown on Drawing 10934-000-A in [MPP5](#).

3.2 Site Access

Access to the site is via an entrance off Baldwins Crescent, which connects via the A483 Fabian Way to the M4 at junction 42 (approximately 3.5km to the east).

3.3 Site Layout

The permitted area is shown in Drawing 10934-000-B in [MPP5](#).

The site occupies an area of ~3.1 hectares (~7.7 acres) and comprises a large open yard enclosed on the southern side by a 1.5-2m high bund and the dock to the north. A block plan for the site is shown in Drawing 10934-000-C in [MPP5](#). The layout (describing the site in an approximate east to west direction) comprises the following primary areas:

- Two weighbridges and separate accesses for ingress to and egress from the site;
- A single storey building incorporating the Weighbridge Office, administrative offices and staff welfare facilities (including kitchen and toilet facilities);
- An area for storage, processing and bulking of non-ferrous metals which includes:
 - A building for reception, inspection, processing and storage of non-ferrous wastes; and
 - A bunded storage area for non-ferrous pucks that are contaminated with soluble cutting oils; and
 - Designated external storage areas for bagged/containerised non-ferrous wastes awaiting dispatch;
 - Areas for equipment storage.
- An area for storage, processing and bulking of ferrous metals occupying the majority of the remainder of the site which includes:
 - An area for the reception and inspection of non-ferrous wastes;
 - Designated storage areas for accepted waste awaiting processing;
 - Areas for the processing of ferrous waste by cutting, grinding, shearing and baling; and
 - Designated storage areas for ferrous wastes awaiting dispatch.
- A quarantine area and area for storage of hazardous wastes; and
- A storage area for non-hazardous waste residual waste.

3.4 Sensitive Receptors

The site is located east of Swansea city centre in an area that has been developed extensively for dockside commercial and industrial use. Industrial or commercial premises represent the site's immediate neighbours.

The nearest residential housing is situated in Port Tennant approximately 430m north of the site.



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Other sensitive receptors within 2 km of the site include a mussel farm located in Queen's dock 220m to the south west (and connected to King's Dock via Scherzer Passage 700m west of the site), Crymlyn Bog a designated SSSI, SAC and Ramsar (398m north), Crymlyn Burrows SSSI (1.97km east) and Crymlyn Bog and Pant y Sais NNR (1.19km north).

In terms of flood risk, the eastern area of the site (offices and non-ferrous storage/processing area) are categorised as lying in a Flood Zone 3 area, with a patchwork of Flood Zone 2 and 3 areas covering the west of the site (ferrous storage and processing area).

- Flood Zone 3 - land assessed as having a 1 in 100 or greater annual probability of river flooding (>1%), or a 1 in 200 or greater annual probability of flooding from the sea (>0.5%) in any year
- Flood Zone 2 - land assessed as having between a 1 in 100 and 1 in 1,000 annual probability of river flooding (1% – 0.1%), or between a 1 in 200 and 1 in 1,000 annual probability of sea flooding (0.5% – 0.1%) in any year

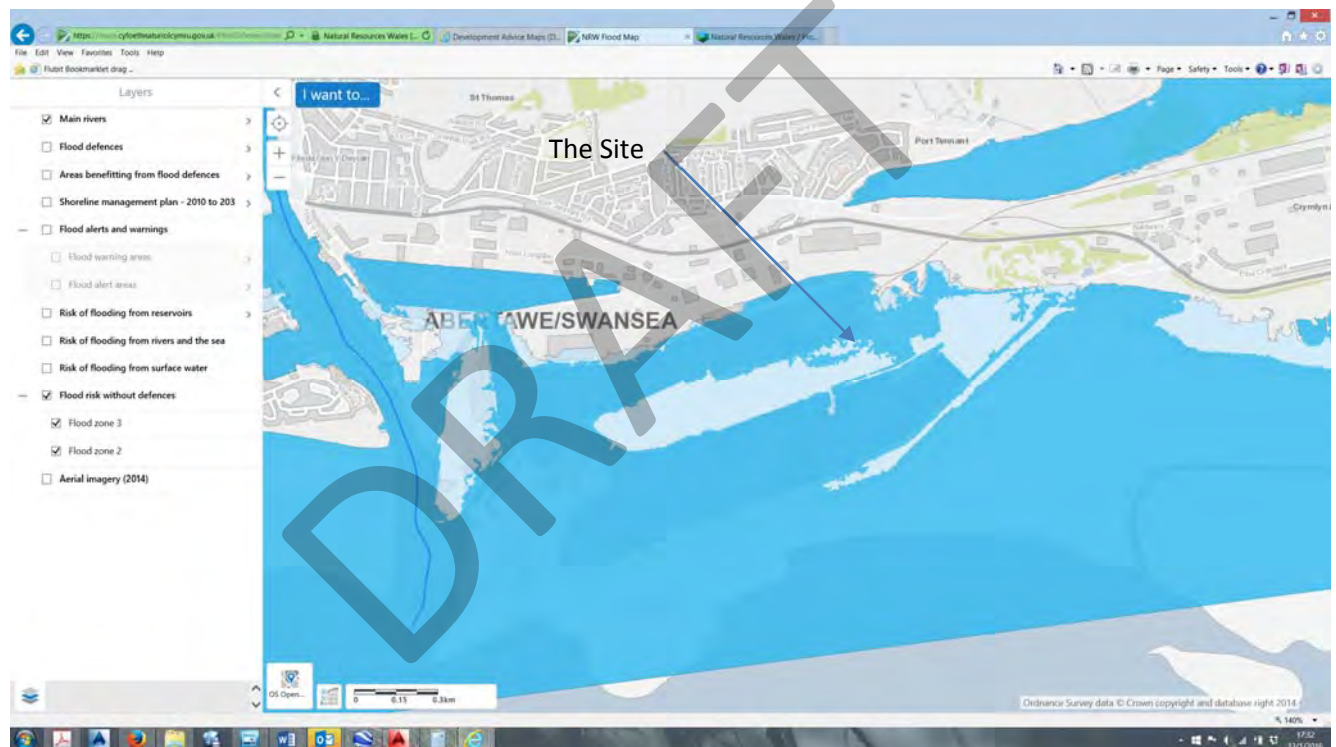


Figure 1. Flood Zones

According to NRW's web site the site does not lie in a Groundwater Protection Zone or Groundwater Vulnerability Zone, nor is it underlain by any designation of aquifer.



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4 PERMITTED OPERATIONS, PERSONNEL AND TRAINING

4.1 Specified Operations

The site has been developed as a metal recycling facility. The site operations are designed for the purposes of recycling all ferrous and non-ferrous scrap metal delivered into the facility by licensed waste carriers (including our own vehicles).

Any Waste Activities not indicated in the site's permit should not be undertaken without consultation with the Site Manager and Natural Resources Wales as required.

For the purposes of the permit, the specified waste operations are classified within the following sections.

4.1.1 Metal Recycling Facility

The company operates a Metal Recycling Facility for the recovery (including storage) of ferrous and non-ferrous scrap metal.

The total quantity of waste that can be accepted at the site under these rules must be less than 75,000 tonnes per year. Burning of any wastes, either in the open, inside buildings or in any form of incinerator is not permitted.

Point source emissions into surface waters or groundwater are not permitted. However, under the emissions of substances not controlled by emission limits rule:

- liquids may be discharged into a sewer subject to a consent issued by the local water company;
- liquids may be taken off-site in a tanker for disposal or recovery; and
- clean surface water from roofs, or from areas of the site that are not being used in connection with storing and treating waste, may be discharged directly to surface waters, or to groundwater by seepage through the soil via a soakaway.

Vehicle storage, depollution and dismantling (authorised treatment) facility	
Description of Activities	Limits of Activities
R13: Storage of wastes pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced) R4 Recycling/reclamation of metals and metal compounds	Treatment consisting only of sorting, separation, grading, shearing, shredding, baling, compacting, crushing, granulating and cutting of ferrous metals or alloys and non-ferrous metals into different components for recovery. There shall be no treatment of lead acid batteries. Wastes shall be stored for no longer than 3 years prior to recovery.

Table 2 Waste management operations to be undertaken

The waste categories to be imported into the facility are contained in the European Waste Catalogue and are listed below:

NOTE: Any waste whose six digit code is marked with an asterisk (*) is a hazardous waste.



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Exclusions:

Wastes having any of the following characteristics shall not be accepted;

- Consisting solely or mainly of dusts, powders or loose fibres; and
- Wastes that are in a form which is either sludge or liquid.

02	WASTES FROM AGRICULTURE, HORTICULTURE, AQUACULTURE, FORESTRY, HUNTING AND FISHING, FOOD PREPARATION AND PROCESSING
02 01	wastes from agriculture, horticulture, aquaculture, forestry, hunting and fishing
02 01 10	waste metal
12	WASTES FROM SHAPING AND PHYSICAL AND MECHANICAL SURFACE TREATMENT OF METALS AND PLASTICS
12 01	wastes from shaping and physical and mechanical surface treatment of metals and plastics
12 01 01	ferrous metal filings and turnings
12 01 03	non-ferrous metal filings and turnings
15	WASTE PACKAGING, ABSORBENTS, FILTER MATERIALS, WIPING CLOTHS AND PROTECTIVE CLOTHING NOT OTHERWISE SPECIFIED
15 01	packaging (including separately collected municipal packaging waste)
15 01 04	metallic packaging
16	WASTES NOT OTHERWISE SPECIFIED IN THE LIST
16 01	end-of-life vehicles from different means of transport [including off-road machinery] and wastes from dismantling of end-of-life vehicles and vehicle maintenance (except 13,14, 16 06 and 16 08)
16 01 06	end-of-life vehicles (containing neither liquids nor other hazardous components)
16 01 17	ferrous metal
16 01 18	non-ferrous metal
16 01 22	discarded components not otherwise specified
16 06	batteries and accumulators
16 06 01*	lead batteries
17	CONSTRUCTION AND DEMOLITION WASTES (INCLUDING EXCAVATED SOIL FROM CONTAMINATED SITES)
17 04	metals (including their alloys)
17 04 01	copper, bronze, brass
17 04 02	aluminium
17 04 03	lead
17 04 04	zinc
17 04 05	iron and steel
17 04 06	tin
17 04 07	mixed metals
17 04 11	cables other than those mentioned in 17 04 10
19	WASTES FROM WASTE MANAGEMENT FACILITIES, OFF-SITE WASTE WATER TREATMENT PLANTS AND PREPARATION OF WATER INTENDED FOR HUMAN CONSUMPTION/INDUSTRIAL USE
19 01	wastes from incineration or pyrolysis of waste



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19 01 02	ferrous materials removed from bottom ash
19 10	from shredding of metal-containing wastes
19 10 01	iron and steel waste
19 10 02	non-ferrous waste
19 12	wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified
19 12 02	ferrous metal
19 12 03	non-ferrous metal
20	MUNICIPAL WASTES (HOUSEHOLD WASTE AND SIMILAR COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL WASTES) INCLUDING SEPARATELY COLLECTED FRACTIONS
20 01	separately collected fractions (except 15 01)
20 01 33*	batteries and accumulators included in 16 06 01, 16 06 02 or 16 06 03 and unsorted batteries and accumulators containing these batteries (consisting of lead batteries only)
20 01 40	metals

4.2 Operational Flowchart

The block diagram presented as Drawing 10934-000-I in [MPP5](#) provides a summary of processes and materials flows to be undertaken at the facility.

4.3 Hours of Operation

There are no restrictions on opening hours for the site. Normal opening hours are:

Monday – Friday	Saturday	Sunday	Bank/Public Holidays
07:30 – 17:00	Closed (except for maintenance)	Closed	Closed

Table 3. Hours for dismantling operations

4.4 Site Personnel

Technically competent staff will supervise the site and ensure that it is operated in accordance with the environmental permit, this Management System Plan and current legislation.

An organisation chart identifying persons responsible for key management functions, including responsibility for Environmental performance will be maintained by the company.

The Site Manager will ensure that sufficient competent staff are present on-site to manage and operate the sites activities without causing pollution. Staff will be competent in the activities they are expected to carry out. Staff will be expected to not only be competent in normal situations, but also be adequately trained so that they are competent in abnormal situations such as plant failures or accidents.

The Technically Competent Person is Mr. Adrian Stewart who holds a WAMITAB Level 4 qualification in accordance with permit requirements. Other Technically Competent Persons will be recruited as necessary to maintain compliance with permit attendance criteria. The times that the Technically Competent Person spends at the facility during operating hours will be recorded in the Site Diary.

Staff roles and responsibilities will be clearly defined and names will be placed against each role and responsibility (e.g. technically competent person). Documentation stating who is in charge of ensuring



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compliance with each part of the permit and other relevant legislation and guidance will be kept and updated at least every 6 months, or if staff change roles or leave the organisation ([Procedure PR10](#) and [Form FR8](#)).

Any person with duties that are controlled by the permit will have convenient access to a copy of it, kept at or near the place where they work. This includes not only staff but any contractors that may be working on the site as well. The copy may be in paper form or electronically available. Staff and contractors will be made aware of the permit, what is contained in it, what their obligations are under it and where and how to access it during their initial site induction.

4.5 Staff Training

New employees will be given full induction training by site managerial staff or other appropriately qualified persons and records will be kept of all staff training in relation to operation of the site, site specific emergency procedures and the content and requirements of the Environmental Permit and Management System Plan.

According to their various roles and responsibilities, individuals will be instructed in the following necessary procedures regarding the environmental aspects of the site operations:

- Receiving and inspecting loaded waste vehicles.
- Duty of Care requirements and record keeping.
- Unloading and scrutinising tipped loads.
- Dealing with any unauthorised wastes.
- Use of any mechanical plant at the site.
- Storage of wastes.
- Dispatch of recovered materials and discards.
- Hazardous waste controls.
- General housekeeping including: cleanliness of the site and its environs, equipment maintenance, inspection and maintenance of any drainage systems.

All Technically Competent Persons holders will undertake training as required to demonstrate Continuing Competence.

Environmental and competence training is provided by Smart Development Training Ltd.

A copy of this Management System Plan and Environmental Permit will be made available at the facility for all staff to read and, as a minimum; they will be informed of the importance of these documents and of the key areas of concern. They will also be fully briefed on the role of Natural Resources Wales in enforcing compliance.

Competence and training of all site employees is monitored by the site's HR Manager in accordance with [Procedure PR8](#). A training matrix and training records ([Forms FR6 and FR7](#)) are kept and maintained in the Weighbridge Office.

4.6 Site Health and Safety

The company is conscious of its obligations to their staff, contractors and visitors and the company's Environmental Management System dovetails with the company's in-house Health and Safety management and Quality management processes and/or systems.

The company's Health and Safety Policy, induction pack/employee handbook and training programmes provide significant information to staff and visitors relating to on-site Health and Safety features, processes and duties.



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Signage around the site highlights important safety considerations for staff and visitors before entering site. The full set of site rules ([ROI1 Site Rules](#)) is displayed on a board located to the right hand side of the incoming weighbridge and is clearly visible to drivers entering the facility. A copy of the site rules is also available at the main reception and a further copy affixed to the staff notice board.

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5 SITE INFRASTRUCTURE

5.1 Site Entrance

An identification sign is erected and maintained in a prominent position at the site entrance. The sign is approximately 1m by 1m and displays the following information.

- Site name and address
- Name of site operator
- Name of EP holder
- EP number
- Emergency contact telephone number
- Statement that the site is licensed by Natural Resources Wales
- Natural Resources Wales contact details
- Operational site hours

5.2 Site Accommodation

The site is equipped with the following facilities:

- Site office facilities
- Welfare/Mess facilities

The site office is positioned adjacent to the main entrance and is equipped with a telephone line, suitable for emergency calls. The office provides suitable space to permit secure short-term record keeping. All records specifically relating to recycling operations are retained on-site. The site office will keep a copy of the Environmental Permit (EP) and the most up-to-date approved copy of the Environmental Management System (EMS). All site staff are made aware of the EP and EMS, and are required to be aware of the documents' contents.

Appropriate welfare facilities are provided at site and maintained by site staff. Car parking is provided for staff members and site visitors in the vicinity of the site office. This area is maintained to minimise surface water ponding and to direct surface water to the sites' drainage system.

5.3 Plant and Equipment

The following plant and equipment is located within the site:

- 2 x shears.
- Baler.
- 3 x excavators with grab attachments.
- Hand tools including oxyacetylene cutting equipment.
- Mobile lifting and waste handling equipment.
- 2 x HGVs for transporting waste.
- 4 x trailer units
- Liquid storage tanks.
- Oxygen and Acetylene bottles.



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A full list of significant items of equipment can be found in [FR4 Maintenance, Service, Calibration Schedule](#).

5.4 Lighting

Security lighting and lighting to ensure H&S requirements are met in low-light conditions is available.

5.5 Site Security

The whole permitted site is within an enclosed site rented by EPS Materials Recovery Limited from Associated British Ports (ABP).

The Swansea Docks site is monitored by manned security personnel, with manned barrier controlled access operated 24/7. The permitted site is further secured by a combination of perimeter fencing and bunding, with all site equipment and machinery securely stored within the site boundary when not in use. Smaller items of equipment and valuable wastes are stored within secure containers or within the non-ferrous processing building. Access to the site is via palisade-type gates 2.4m high.

The security gates and site boundary are inspected daily as part of the site inspection schedule. The gates are locked at all times when the site is unattended.

During the period which the site has been operational, the security boundary has been proven to be fit for purpose.

The port site is monitored 24/7 by contractors of ABP, with CCTV cameras recording activity at a number of locations around the port. The site buildings are alarmed.

In the event of unauthorised intrusion, the circumstances and any subsequent action taken will be entered in the Site Diary.

5.6 Inspection and Maintenance Procedures for Site Infrastructure

The yard, treatment and storage buildings, office/welfare buildings, fence/bund and entrance gates/doors are inspected twice daily and the outcome of those inspections are recorded on the daily inspection checklist as shown in EMS [Form FR1](#) and if necessary as a CAR ([Form FR10](#)). The CAR will identify the root cause of the problem and allocate a person and timeframe to ensure that the corrective action is carried out. Any defect encountered during inspection will be repaired as soon as is reasonably practicable within the working day as a temporary measure and permanent repairs will be completed within 7 working days.

The existing concrete slabs will be cleared of all wastes in a phased sequence to ensure that all areas are progressively exposed for inspection at a frequency no less than once per month. The cleared areas will be swept clean or scraped to remove any adhering solids. The exposed areas will then be inspected thoroughly, with impervious surfaces inspected to ensure continuing impervious integrity and all surfaces inspected for wear and tear that may impact their suitability for use. Any defects will be repaired to a standard no less than that when new. The dates of all such inspections, the findings and any repairs and cleaning undertaken will be entered in the Site Diary.

Maintenance procedures are detailed in [Procedure PR9](#). A plant and equipment inventory and a maintenance schedule identifying items of plant, location of maintenance instructions and responsibilities will be kept and maintained ([Forms FR3 and FR4](#)). Maintenance records ([Form FR5](#)) for plant and equipment and site infrastructure will be kept in the Weighbridge Office and maintained by the Site Manager.



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6 SITE ENGINEERING FOR POLLUTION PREVENTION AND CONTROL

In general waste management activities at the site relate to the receipt, storage, size reduction, baling/bulking and dispatch of ferrous and non-ferrous metals for recycling at licensed waste management facilities.

6.1 Overview of Site

The site comprises a number of buildings and a large open yard area nominally divided into areas for the different waste operations.

6.1.1 Waste Treatment and Storage Activities (Existing)

Waste treatment and storage activities are currently undertaken on surfaces as follows:

Description of Activities	Surface
Storage of uncontaminated ferrous metal wastes or alloys and uncontaminated non-ferrous metal waste	Ferrous - Hard standing or an impermeable surface without drainage (surface water removed by infiltration in adjacent unsurfaced land). Non-Ferrous - Impermeable surface with sealed drainage to sump or hard standing with sealed drainage system to surface water sewer.
Storage of all other wastes (including contaminated ferrous metal wastes or alloys, contaminated non-ferrous metal waste, hazardous and residual wastes)	Non-Ferrous - Impermeable surface with sealed drainage system to sump or hard standing with sealed drainage system to surface water sewer. Other wastes - Impermeable surface with sealed drainage system.
Treatment of wastes (baling, cutting, grinding, shearing, etc.)	Impermeable surface with sealed drainage system to sump, or hard standing or an impermeable surface without drainage (surface water removed by infiltration in adjacent unsurfaced land).
Storage of batteries	Lead acid batteries stored in containers with an impermeable, acid resistant base and a cover to prevent ingress of water.
Storage of liquids	Bunded containers.

6.1.2 Waste Treatment and Storage Activities (Proposed)

Waste treatment and storage activities will be undertaken on surfaces as follows:

Description of Activities	Surface
Storage of uncontaminated ferrous metal wastes or alloys and uncontaminated non-ferrous metal waste	Hard standing or an impermeable surface with sealed drainage to class 1 full-retention interceptors (with silt trap) for treatment prior to discharge to coastal waters.



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Storage of all other wastes (including contaminated ferrous metal wastes or alloys, contaminated non-ferrous metal waste, hazardous and residual wastes)	Impermeable surface with sealed drainage system to sealed sump.
Treatment of wastes (baling, cutting, grinding, shearing, etc.)	Impermeable surface with sealed drainage system to sealed sump.
Storage of batteries	Lead acid batteries stored in containers with an impermeable, acid resistant base and a cover to prevent ingress of water.
Storage of liquids	Bunded containers.

These changes will be implemented to a schedule to be agreed with NRW.

6.2 Yard Area (Existing)

6.2.1 Surfacing Design and Construction

Drawing 10934-000-C in **MPP5** details surfacing within the site.

The yard area is surfaced as follows:

- 220mm thick concrete bedded on clean hardcore or crushed stone laid to a minimum depth of 200mm;
- ~50mm asphalt on 220mm thick concrete bedded on clean hardcore or crushed stone laid to a minimum depth of 200mm;
- 180mm thick asphalt hardstand; and
- 150mm thick stone hardstand.

A small unsurfaced area is located at the western extremity of the site.

6.2.2 Drainage Design (Existing)

Drawing 10934-000-D in **MPP5** shows a drainage plan of the existing site.

Treatment Area 1 - A 14m x 9m concrete pad area, located to the western corner of the site is used for the treatment (shearing) of metal wastes. This pad is graded such that surface water falls by gravity to a drain located at the northern edge of the pad. Surface water is subsequently transferred via a sealed drainage system to a sump located to the south of the pad.

Treatment Area 2 – An approx. 30m x 20m concrete pad area is located to the west of Treatment Area 1 and is used for cutting, grinding and storage of metal waste prior to treatment. This pad is graded to channel surface run-off in a south westerly direction until it reaches the periphery of the site where it filtrates into the surrounding hardstand and unsurfaced areas.

Treatment Area 3 – An approx. 16m x 6m hardstand area used for treatment (shearing) is located to the south of the site adjacent to the bund running along the southern boundary. This area is graded to channel surface run-off in a south westerly direction until it reaches the periphery of the site where it filtrates into the surrounding hardstand and unsurfaced areas.



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Treatment Area 4 – A 7m x 7m “L-shaped” concrete pad area used for treatment (baling) is located along the southerly boundary to the east of Treatment Area 3. This pad is kerbed to retain surface run-off within the pad area from where it is pumped to IBCs for storage prior to disposal at licensed waste management facilities.

Storage Area 1 – An approx. 140m x 15m concrete pad area located to the north of the site running parallel with the wharf. Surface run-off flows by gravity in a north-westerly direction until it is held back by the kerbed edge of the dock and is channelled westwards where it filtrates into the surrounding hardstand and unsurfaced areas.

Storage Area 2 – An approx. 165m x 15m asphalt hardstand area running parallel with the southern boundary of the site and nominally divided into 3 separate stockpiles. This area is graded to channel surface run-off in a south westerly direction until it reaches the periphery of the site where it filtrates into the surrounding hardstand and unsurfaced areas.

Storage Area 3 – A 20m x 12m concrete surfaced bunded storage area to the east of the site. Surface water drains to the rear of the pad and is retained by the walls of the storage area. It is subsequently pumped from the bunded area into IBCs located on hardstand adjacent to the storage area.

Storage Area 4 – An approx. 25m x 11m concrete area graded such that surface water run-off travels north and infiltrates into unsurfaced ground adjacent to the storage area.

Storage Area 5 – An approx. 26m x 13m “L-shaped” asphalt hardstand storage area. This area is graded to channel surface run-off in a south westerly direction until it reaches the periphery of the site where it infiltrates into the surrounding hardstand and unsurfaced areas.

The remainder of the yard area is graded to channel surface run-off in a north westerly or south westerly direction until it reaches the peripheries of the site where it filtrates into the surrounding hardstand and unsurfaced areas.

On a weekly basis, and more often during other periods such as adverse weather conditions, site operatives will inspect the sealed sumps and check the level of retained water. Water will be removed and taken to a licensed waste management facility for treatment. This will be recorded and monitored within the site diary.

6.2.3 Yard Area (Proposed)

Block and drainage plans of the site annotated with proposed changes to surfaces and drainage are shown in Drawings 10934-000-D (Rev. A) and 10934-000-D (Rev. A) in **MPP5**. The proposed changes are:

Treatment Area 2 – The existing pad is to be kerbed and a drain placed at the lowest point of the pad. Surface water will fall by gravity to the drain before being transferred via a sealed drainage system to an existing sealed sump located to the south of the pad (that also serves Treatment Area 1).

Treatment Area 3 – A kerbed concrete pad will be constructed as a base for the existing shears. Surface water will fall by gravity to a drain before being transferred via a sealed drainage system to a suitably sized sealed sump.

Storage Areas 1 and 2 – An approx. 1m wide x 1m deep cut-off ditch lined with an impermeable geotextile layer will be constructed along the southern perimeter of the site running parallel with the existing bund. Surface water from the southern half of the site will flow in a south-westerly direction until it enters the cut-off ditch from where it will gravity-drain towards the western end of the site. Surface water within the cut-off drain will be piped into a Class 1 Full Retention Interceptor (with silt trap) before passing through a penstock valve and then discharging into the adjacent dock.

Water from the northern half of the site flows by gravity in a north-westerly direction until it is held back by the kerbed edge of the dock and is channelled westwards. A cut-off drain approx.. 1m wide x 1m deep and lined with an impermeable geotextile layer will be constructed to intercept the surface water before it reaches the unsurfaced area of the site. Surface water within the cut-off drain will flow by gravity into a second Class 1 Full Retention Interceptor (with silt trap) before passing through a penstock valve and then discharging into the



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adjacent dock. The northern area will require approximately 200m³ of storage to attenuate flows in a 1 in 100 year storm event and avoid flooding of the site. The nature and location of any attenuating storage will be determined in detailed design, however an indicative location for a storage lagoon is shown.

In the event of failure of the containment or treatment (e.g. a blockage) surface water overflowing the drains would flow in a south-westerly direction and be contained by the bund at the southern boundary of the site. Surface water would then infiltrate into surrounding ground. Due to the grading of the site, surface water would flow away from the dock avoiding any uncontrolled release to coastal waters.

The drainage system is subject to detail design following a programme of surface water sampling currently being undertaken by the Operator. The sampling is being carried out to establish the nature of existing surface water run-off such that it can be demonstrated to NRW that any proposed drainage design will be effective at controlling the quality of any discharge. Should pre-treatment be required prior to discharge its nature and location will be determined in detailed design, however an indicative location is shown.

Consent will be sought from Natural Resources Wales for the discharge to coastal waters.

Storage Area 3 – IBCs will be bunded to ensure containment of stored liquid in the event of a leak/accident. The Operator intends to replace the IBCs with a sealed drainage system and sealed sump at a future date.

Storage Area 4 – New kerbs will be installed around the existing pad and a drain located at the lowest point of the pad. Surface water will be transferred via a sealed drainage system to a sealed sump.

Storage Area 5 – No longer used. Should this area be brought into use wastes will be stored on an impermeable pad with sealed drainage system and sump.

On completion of detailed design the Operator will agree a schedule for implementation of these changes with NRW.

6.3 Treatment/Storage Building

6.3.1.1 Design and Construction

Non-Ferrous Processing is carried out within a 24.5m x 12.5m building of a steel portal frame construction covered in trapezoidal formed steel cladding.

The existing floor comprises an impermeable reinforced concrete surface >200mm thick.

The floor will be inspected annually by a Chartered Civil Engineer who will report whether or not the impermeable surface is in a good condition and suitable for the purpose described in this plan.

Non-Ferrous waste storage is carried out both within the building and within designated areas within the yard as detailed in 6.2.2.

6.3.1.2 Drainage Design

A fall on the concrete slab channels liquid by gravity to the centre of the building where it can be manually removed.

Roof water from the Processing Building is directed through gutters and downpipes to surface water sewer.

6.3.2 Office Building

6.3.2.1 Design and Construction

A 30m x 10m single storey, brick-built, office building is located close to the entrance to the site and adjacent to two weighbridges. The building houses the weighbridge office, administrative offices and staff welfare facilities.



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6.3.2.2 Foul Drainage

Foul water from the welfare/toilet facilities is connected to a septic tank and soakaway.

6.3.2.3 Roof Water Drainage

Roof water from the Office Building is directed through gutters and downpipes to surface water sewer.

6.4 Design and Construction of Fuel, Oil and Gas Storage Tanks

The following fuel, oil and gas storage is present on-site:

- Diesel is stored above ground in a single – skin metal tank holding 5,000 litres. The tank is located within a concrete bund capable of holding >110% of the tank capacity.
- Diesel is also stored above ground in 2 x double – skin plastic tanks holding 1,500 litres (shears) and 1 x double –skin plastic tank holding 5,000 litres (baler).
- Heating Oil is stored above ground in a double – skin plastic tank holding 1,500 litres.
- Surface water run-off contaminated with water-soluble cutting oils that has been removed from the non-ferrous storage area is held in 5 IBCs located within a bunded area to the rear of the storage area (see 6.2.2).
- Oxygen and Acetylene gas bottles are stored in purpose built frames stored to the west of the site.
- Workshop oils and lubricants are stored in a locked metal container to the rear of the office building.



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7 SITE OPERATIONS, SYSTEMS AND PROCEDURES

7.1 Waste Acceptance, Control Systems and Procedures

Refer to [Procedure PR7](#) for details of Waste Acceptance Procedure.

7.2 Waste Quantity Measurement System

Two weighbridges are operational on-site.

All waste arriving or leaving the facility is required to pass over a site weighbridge for the purposes of recording the consignment weight.

Each weighbridge receives at least 1 annual calibration check in addition to the regular system checks as required under weights and measures legislation.

The information regarding weights passing over the weighbridge is retained at the weighbridge office for further reference.

CCTV footage is recorded at the Weighbridge.

7.3 Waste Sampling and Testing

It is not normally necessary for the Permit Holder to sample and analyse waste supplies since these are limited to loads of predictable nature. Where non-conforming materials are discovered these will be quarantined and expert advice sought. This, as appropriate, will include the advice of Natural Resources Wales.

The occasions when any sampling is undertaken will be recorded in the Site Diary. Results of all such analyses will be retained in the site office.

7.4 Waste Hierarchy

All waste should be considered and treated in accordance with the waste hierarchy (Article 4 of the Waste Framework Directive). Where disposal is necessary, this should be undertaken in a manner that minimises its impact on the environment.

7.5 Waste Treatment Procedures

This document, and any other procedures contained within the EMS (and relevant H&S and Quality documents) should be followed at all times.

7.6 Waste storage

7.6.1 General

Waste will be stored in designated areas of the facility.

Storage areas will include:

- Metals awaiting treatment by cutting, grinding, shearing or baling
- Processed metals awaiting loading and dispatch
- Hazardous waste storage area
- Quarantine area
- Residual waste storage area

A storage plan for the facility is presented in Drawing 10934-000-E in [MPP5](#).



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7.6.2 Outside Storage

With the exception of certain high-value non-ferrous metals, all wastes are stored outside.

7.6.3 Storage Durations

The facility will have the following maximum tonnages and storage times:

Material	Number/Tonnes	Storage Time
Ferrous and Non-Ferrous Metals	150,000 Tonnes	3 years
Batteries	10 Tonnes	3 months
Hazardous wastes	10 Tonnes	3 months
Quarantined wastes	10 Tonnes	1 month
Residual waste	20 Tonnes	1 month

In accordance with the requirements of the site's permit:

- Wastes shall be stored for no longer than 3 years prior to recovery.

7.7 Dispatch

Wastes leaving the site for further treatment, disposal or recovery, are described, quantified and appropriately containerised (where necessary) in accordance with the Duty of Care. Such materials are transported by authorised waste carriers only and dispatched only to authorised outlets.

Hazardous wastes removed from the site will be handled in accordance with the required consignment note procedures.

All records of delivery and dispatch, including copies of the Duty of Care Transfer Notes, Hazardous Waste Consignment Notes, Trans-Frontier Shipment records, etc. will be maintained in the site office. These are available for inspection by authorised officers of Natural Resources Wales at any reasonable time. Quarterly 'waste returns' will be provided to Natural Resources Wales as required.

The Company's regular waste suppliers and outlet providers will be periodically visited and their control procedures assessed to safeguard the Permit Holders' Duty of Care responsibilities.

7.8 Contingency

Should the process controls fail at any point within the processing of wastes through any of the operational processes, acceptance of waste into the site will operate in this order:

- The site will not accept more waste that it can process effectively at any one time and not above the permitted tonnage per annum or storage capacities stated in Section 7.6.
- In the event that the site reaches its maximum capacity, the Site Manager will divert any further incoming waste from the site to neighbouring facilities that are able to process the same types of waste until such a time when the site can resume operations within its normal operating capacity.
- Receipt of feedstock materials shall not recommence until a full review of this Management Plan has been conducted and process controls amended as required.

7.9 Records

Records for wastes received and dispatched at the site are kept securely in the Weighbridge Office. The company will maintain a register of waste facilities to which it dispatches wastes along with copies of their environmental permits and EWC codes permitted at the facility ([Form FR11](#)).



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8 POLLUTION CONTROL AND AMENITY MANAGEMENT, MONITORING AND REPORTING SYSTEMS

8.1 Pollution Control and Amenity Management

8.1.1 General

8.1.1.1 Site Inspections

The Site Manager is responsible for carrying out site inspections on a twice daily basis. These inspections provide a mechanism to assess whether site operations are being carried out in accordance with the EMS and that environmental management and control systems are operating within expected performance limits. A record of site inspections is made on a Site Inspections Checklist ([Form FR1](#)), along with any remedial action required.

8.1.1.2 Monitoring and Sampling

Where Natural Resources Wales has requested in writing that it shall be notified when the operator is to undertake monitoring and/or spot sampling, the operator will inform Natural Resources Wales when the relevant monitoring and/or spot sampling is to take place. The operator shall provide this information to Natural Resources Wales at least 14 days before the date the monitoring is to be undertaken.

8.1.1.3 Site Emergency Plan

The company has an Accident/Pollution Incident Management Plan which forms part of its Environmental Management System ([MPP4](#)). This complies with Natural Resources Wales's requirements for a Site Emergency Plan.

8.1.1.4 Accidents and Incidents

The Accident/Pollution Incident Plan ([MPP4](#)) and EMS Procedures ([Procedures PR1 – PR6](#)) detail the approaches that should be followed in the event of an accident or pollution incident. Any incident should be recorded on an Environmental Accident (and Incident) Record ([Form FR9](#)) and reported in accordance with [Procedure PR11](#).

8.1.1.5 Environmental Risk Assessment

An environmental risk assessment ([Risk Assessment RA1](#)) has been undertaken for the facility and has informed the measures implemented in the following sections. Key considerations for the facility are:

- Contamination of sensitive coastal waters (Shellfish Waters) due to leaks and spills.

Due to the scale of the facility and nature of wastes received, and its distance from sensitive receptors the likelihood of impact from odour, noise, dust, litter, pests, mud and fugitive emissions is assessed as low. These risks still require consideration and control and monitoring steps are also detailed below.

A summary of Environmental Impacts and Controls can be found in [MPP2](#).

8.1.2 Management of Environmental Risks

Emissions of substances not controlled by emission limits (excluding odour) shall not cause pollution.

If notified by Natural Resources Wales that the activities are giving rise to pollution, the Operator will submit to Natural Resources Wales for approval within the period specified, an emissions management plan. This plan will be implemented from the date of approval, unless otherwise agreed in writing by Natural Resources Wales.

8.1.2.1 Leaks and Spills

EMS [Procedure PR3](#) details the spillage procedure and should be followed in the event of a spill.



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Spill equipment will be available and site staff are responsible for and trained in its use.

To minimise the risk of leaks and spills, the following operational procedures shall be implemented:

- All fuels and oils will be stored in double-lined bunded tanks.
- Delivery of fuels and oils will be supervised by a responsible member of staff.
- The quantity of fuel in storage will be checked, either using a sight glass or by dipping, prior to the fuel delivery being made. The maximum residual capacity of the tank will be determined prior to the commencement of re-filling, so as to prevent overflow.
- All hydraulic, lubricating and waste oils will be stored on/above a suitable spillage containment tray, which will collect any leaks from the drums.
- All drums and similar containers stored within the facility will have their contents and capacity clearly marked.
- To prevent spillages, drum openings will be carried out on a spillage tray.
- Sand and absorbent granules are to be kept on site at all times for immediate use to soak up minor spillages.
- In the event of a major spill, immediate action will be taken to contain the spillage and prevent contamination of surface water run-off. Closure of the penstock valve controlling the discharge of site surface water should be undertaken immediately. Once contained, the spillage will be treated with absorbent and removed to a sealed container for disposal at a licensed facility. The stock of sand and granules shall be replenished as soon as possible.
- A supply of lime will be maintained to neutralise any spillage of battery acid.
- Records shall be recorded in the site diary and a CAR raised (**Form FR10**) to show how the spillage occurred (if known), what the spillage was and the remedial actions taken.
- Operational staff will receive pollution prevention and spill response training.
- Any spillages will result in a CAR being raised to establish the root cause of the problem and if deemed necessary reviewed at quarterly business management meetings or sooner if there is a significant risk to the environment or operations of the business.

8.1.2.2 Fire Prevention and Control

In the event of a fire occurring on site, the procedures described within the Site Emergency Plan should be followed.

The site of the fire will be immediately evacuated of non-essential personnel and in the case of a minor incident, fire extinguishers or water spray will be applied.

In the event of a major or a potentially major fire occurring, the emergency services will be notified, the site cleared of all personnel and necessary co-operation offered to the senior emergency officer in attendance. In the event of firefighting which necessitates the application of quantities of water, a temporary boom may be constructed by laying an adequate number of sandbags or similar items or equipment in order to contain any runoff from entering the adjacent dock. Closure of the penstock valve controlling the discharge of site surface water should be undertaken immediately and site drains to the rear of the office will be sealed using covers or sand bags. Following containment of such runoff, the liquid collected will be disposed of according to any contaminants that may be present e.g. suspended solids will be separated or if any other contaminants are present (e.g. fuel/oil from vehicles/plant) the liquids will be removed from the site by a suitably licensed carrier to a suitably licensed (permitted) disposal facility.



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All incidents of fires will be reported to Natural Resources Wales as soon as reasonably practical (Tel 0800 80 70 60 (National) or 03708 506 506 (Local)).

The following measures will be taken with respect to fire prevention and control:

- No material of any kind shall be burned within the boundaries of the site.
- Smoking is only permitted in the designated area outside of the entrance to the facility.
- Suitable and adequate firefighting materials and equipment will be maintained and kept at appropriate locations on the site as advised by the local fire service.
- All site staff will be trained in the use of onsite firefighting equipment and all firefighting equipment will be replaced/refilled immediately after use. Scheduled maintenance, inspection and overhauling of all firefighting equipment will be carried out on an annual basis.
- In the event of a fire the site will be evacuated and all non-essential personnel, including all members of the general public/visitors. The appropriate emergency services will be called to attend to, or be informed of, any outbreak of fire.
- Neighbours will be advised of the fire occurring at the earliest possible opportunity.
- NRW will be informed of any fire arising on site as soon as is practicable and no later than the following day. Any incidents will be recorded in the site diary and a CAR raised as necessary, along with the details of any actions taken.

8.1.2.3 Surface Water and Groundwater Pollution

All site containment and drainage systems will be inspected at least weekly, throughout the operational life of the site for cracks, defects and cleanliness, by appropriate site staff. The results of each site inspection shall be recorded on the daily/weekly site checklists. All maintenance and repair works will be carried out at the earliest opportunity and with due consideration given to the nature and scale of the issue. NRW shall be informed of all remedial works.

In the event that a storage tank is found to be leaking, arrangements will be made to have the contents transferred to an alternative container, pending completion of repairs. Any water contaminated with fuel and oil in any bunded area will be removed by an appropriately registered waste removal contractor.

The outside storage area will be checked daily as part of the daily site inspection.

The following control measures will be implemented to minimise potential impacts on surface and groundwater:

- Company spillage procedure will be followed in the event of a spill (see 8.1.2.1 for details regarding the control and monitoring of Leaks and Spills).
- Regular maintenance of operational areas such as drainage channels will be carried out.
- Containers and bunds will be inspected and maintained.
- Written management systems will be in place for the identification and minimisation risks of pollution, including those arising from operations, maintenance, accidents, incidents and non-conformances.

8.1.2.4 Flooding

Other than localised flooding of the site during periods of exceptionally heavy rainfall, inundation of the site by sea water (during exceptional high tides coupled with storm surges) is a potential risk for this site (and much of the Swansea Dock area). The site has been assessed and has between a 1 in 200 and 1 in 1,000 annual probability of sea flooding (0.5% – 0.1%) in any year.



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In the event of a flood the permitted waste types that may be washed off site would add to the volume of the post-flood clean-up workload, rather than the hazard. Post-flood clean-up would be made more difficult were waste to be washed into the adjacent dock.

In the event of flooding (or of likely flooding) of the site, the following steps would be taken (only where safe to do so):

- Wastes, liquids and other materials with potential to be washed from the site shall be removed from site (or relocated within the site) to areas less likely to be affected by floodwater;
- The edge of the dock would be bunded using appropriate materials in order to retain waste materials within the site; and
- Where any risk of contaminated water discharging from site as flood waters recede is identified the site's penstock will be closed. Actions required to manage the retained flood water will be identified and actioned in agreement with Natural Resources Wales and the Emergency Services.

8.1.2.5 Noise and Vibration

Site noise is only likely to occur as a result of the movement of plant and vehicles on site or during use of recycling equipment. The noise generated by these activities is similar to other plant and vehicles in general use on the surrounding dock.

All vehicles and plant used at the facility will be of a roadworthy type and to The Road Vehicles (Construction and Use) Regulations 1986 in respect of engine noise and emissions and exhaust silencers. They will be well-maintained and serviced at regular intervals as recommended by the manufacturer.

An auditory inspection shall be carried out by the site manager at least twice per day. Noise levels which are considered higher than usual shall be investigated and recorded in the site diary. Activities will be reduced or stopped until operations are able to commence without elevated noise levels.

The following measures will be taken to minimise the risk of noise and vibration:

- Access roads will be kept in a reasonable condition such that potential noise from vehicles is minimised;
- All plant machinery will be subject to regular inspection and maintenance;
- Installed noise reducing equipment (acoustic panels, silencers, etc.) shall be used and maintained;
- Equipment shall be switched off when not in use; and
- Treatment operations shall be arranged in such a way as to minimise noise production as far as possible.

If notified by Natural Resources Wales that the activities are giving rise to pollution outside the site due to noise and vibration, the Operator will submit to Natural Resources Wales for approval within the period specified, a noise and vibration management plan. This plan will be implemented from the date of approval, unless otherwise agreed in writing by Natural Resources Wales.

8.1.2.6 Dusts, Fibres and Particulates

Due to the nature of the waste and inspection procedures in place, there is little likelihood of excessive dust generating waste being received at the facility.

Operations potentially giving rise to dust generation include:

- Waste receipt and stockpiling;
- The on-site transfer of materials between the processing and the stockpiling/storage areas;
- Processing operations such as grinding;



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- The loading of processed materials onto transport vehicles;
- Where appropriate the sweeping of roads where there have been deposits observed.

The following measures will be taken to minimise the risk of dust release:

- Loads shall be checked for dust generating materials prior to and during tipping;
- Vehicle speed shall be limited;
- Visual dust monitoring shall be undertaken at least twice per day (and records of such recorded within the site diary/inspection form) and generally on an ongoing basis by Site Operatives during processing;

Where airborne material is observed, this will be recorded via the site diary and corrective/preventive action taken. Action will include:

- The use of dust suppression comprising of a hose spray within the yard area; and
- Sweeping of the site to remove dust or mud.

Records of such will be recorded within the site diary/inspection form and if necessary raised as a CAR.

8.1.2.7 Litter

Due to the nature of the waste and inspection procedures in place, the likelihood of windblown litter from site is minimal.

A daily record of litter inspection is logged on the Site Inspection Record ([Form FR1](#)) and during the working day, site supervisors will be alerted to incidents of litter on site.

The following measures will be taken to minimise the risk of litter:

- Light contrary waste fractions to be stored correctly.

In the event of litter being detected during the daily inspection the following measures will be implemented:

- Any litter that is blown outside of the site boundary will be collected no later than 1 hour after the end of the working day.
- The litter collected will be deposited in the relevant container, either for recycling or disposal.

8.1.2.8 Mud and Debris

The site is largely laid to concrete or hardstand and is located in the centre of a large dockside industrial estate. This results in limited opportunity for mud generation.

If during extensive adverse weather conditions, the surfaced areas are seen to be deteriorating in standard of cleanliness, mechanical sweeping supplemented by mechanical cleansing will be implemented.

8.1.2.9 Pests

Due to the nature of the waste and inspection procedures in place, there is little likelihood of animal by-products and food waste that attract pests being received at the facility.

The following measures will be taken to minimise the risk of pests:

- Waste inspected before tipping to identify potential contaminants;
- Quarantine non-conforming putrescible wastes and removal off-site within 72 hours;
- Visual monitoring for pests/vermin performed daily including inspections for evidence of droppings, damage to property/plant or ground disturbance e.g. burrow, nests and excessive infestation present; and



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- Good housekeeping and regular inspection of mess facilities.

In the event of a pest infestation being detected the following measures will be implemented:

- Suitable treatment will be implemented either by employees or by suitable contractors, this may involve the application of insecticides or the setting of traps and poisons, or other measures as appropriate;
- Any waste identified as attracting scavengers shall be isolated and removed from site.

Details of any pest control activities will be recorded during the site inspection and if necessary raised as a CAR.

8.1.2.10 Odours

Due to the nature of the waste and inspection procedures in place, there is little likelihood of odorous waste being received at the facility.

The following measures will be taken to minimise the risk of odour release:

- Rigorous site management practices;
- Waste inspected at the weighbridge and during tipping to identify odour and/or potential odour generating contaminants;
- The rejection (and recording) of odorous wastes;
- The prevention of odorous waste being accepted in future loads by recording and noting the waste producer/carrier as per the 'duty of care' records.
- Where identified onsite, odorous waste shall be isolated, stored in covered containers to prevent the release of odour and removed as soon as possible from site;
- An odour inspection at the site boundary will be carried out by the site manager at least twice per day. Should odour be identified at the site boundary this will be recorded in the site inspection report. Measures to address the odour issues shall be taken immediately. These may include the removal offsite of offending materials, activities being reduced or stopped until operations are able to commence without elevated odour levels or industrial deodoriser being applied.

If notified by Natural Resources Wales that the activities are giving rise to pollution outside the site due to odour, the Operator will submit to Natural Resources Wales for approval within the period specified, an Odour Management Plan. The plan will be implemented from the date of approval, unless otherwise agreed in writing by Natural Resources Wales.

8.1.2.11 Other Fugitive Emissions

Due to the nature of operations, other fugitive emissions have been risk assessed and it determined that emissions are below threshold levels. The contribution to local Air Quality levels via onsite exhaust emissions is negligible when compared to emissions from nearby highways. The facility will however ensure that it is not a generator of significant additional emissions.

The following measures will be taken to control other fugitive emissions:

- All plant machinery will be subject to regular inspection and maintenance;
- Good fuel tank and transfer pipework design.
- Vehicles shall be compliant with relevant exhaust emissions standards;



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8.2 Monitoring

8.2.1 Existing

No formal monitoring is required under the existing Permit conditions.

8.2.2 Proposed

A programme of monitoring of the discharge to surface waters (discussed in 6.2.2) will be agreed with NRW.

8.3 Reporting

8.3.1 Periodic Reporting of Environmental Performance

A quarterly summary will be submitted to NRW in a form to comply with requirements.

A copy of the waste classification (EWC) will be held on site for reference.

8.3.2 Notifications

The following information will be submitted to Natural Resources Wales as soon as practicable after the event (in line with Permit conditions):

- Actual or potential pollution incidents (within 24 hours);
- Breaches of emission limits (within 24 hours);
- Accident and/or fugitive emission (within 24 hours);
- Breach of operating procedures (within 3 days);
- A change of TCM (7 days);
- A conviction and/or an appeal (14 days);
- Financial changes affecting the site operations with regard the conditions within the permit (14 days); and
- Activity commencement and/or changes (7 days).

Natural Resources Wales shall be notified within 14 days of the occurrence of the following matters except where such disclosure is prohibited by Stock Exchange rules:

a) Where the operator is a registered company:

- any change in the operator's trading name, registered name or registered office address; and
- any steps taken with a view to the operator going into administration, entering into a company voluntary arrangement or being wound up.

b) Where the operator is a corporate body other than a registered company:

- any change in the operator's name or address; and
- any steps taken with a view to the dissolution of the operator.

c) In any other case:

- the death of any of the named operators (where the operator consists of more than one named individual);
- any change in the operator's name(s) or address(es); and



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- any steps taken with a view to the operator, or any one of them, going into bankruptcy, entering into a composition or arrangement with creditors, or, in the case them being in a partnership, dissolving the partnership.

8.3.3 Interpretation

As per the meanings described within the permit.

8.4 Complaints

Complaints are to be investigated immediately by the Site Manager. The nature and details of the complaint will be logged on a complaints record form (**Form FR2**), along with the findings of the investigations and any action required. The Site Manager is responsible for determining the appropriate action to be taken and will communicate the nature of the actions to be taken and timescales to the Complainant.

The company's complaints procedure (**Procedure PR12**) applies to all complaints, feedback and requests made by third parties regarding operational activities.

All complaints from third parties including external customers, potential customers, statutory authorities, statutory consultees, members of the general public and internal clients will be forwarded to the Site Manager to action as below.

The Site Manager will ensure that:

- All complaints are logged;
- The complaint is investigated to identify the cause. If a complaint is relayed to the company by a 3rd party (e.g. Natural Resources Wales), this may require direct communication with the complainant in order for the complaint to be effectively investigated;
- Necessary preventative action is taken to both address the cause of the complaint and that measures are implemented to prevent a reoccurrence of the same problem. These actions must be documented and a CAR raised as required;
- The Complainant will be contacted and given information on the investigations conducted and actions taken as appropriate;
- Where a complaint or query is likely to involve a statutory authority, the emergency services, an insurance company, or the media, the Managing Director will be informed;
- Complaints linked to contracts with specific complaints procedures will be reported in line with contractual requirements and timescales. Local procedures may need to be in place to ensure these are adhered to;
- All complaints are discussed at site meetings and reviewed at monthly management meetings; and
- If the investigation indicates that the complaint has not been justified this will be clearly recorded on the Incident Report.

In the event of a complaint being verified as resulting from the operation of the facility the Site Manager is responsible for identifying short and long-term mitigation measures to minimise the risk of future incidents. The efficacy of any mitigation measures will be confirmed through further monitoring at the receptor (subject to the Complainant's agreement) or at a representative position along the site boundary.

Complaints logs, in combination with meteorological data and site monitoring information will be used to assess any trends.



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9 SITE RECORDS

9.1 Security and Availability of Records

The operator will keep on site all records, plans and the management system required to be maintained by its Environmental Permit, unless otherwise agreed in writing by Natural Resources Wales. These will be kept securely in the Weighbridge Office.

Most documents are securely stored electronically, with paper copies also available where required.

Access to the statutory documents and records are made available to any authorised Natural Resources Wales Officer.

Details of documentation and security arrangements are considered to be confidential but can be a matter of discussion with an authorised Natural Resources Wales Officer.

Natural Resources Wales will be provided with a summary of types of quantities of wastes received at the site. These records will be relayed to Natural Resources Wales in an agreed format and at an agreed frequency. The site diary will be stored in the office which is locked outside of office hours. The diary will be used to record site activity and any unusual events. The diary will be made readily available for inspection by any Natural Resources Wales Officer at any reasonable time.

A record of site visitors will be kept including;

- Name (including signature) and company/organisation
- Car Registration
- Person to See
- Time of arrival and departure

The time (when necessary) and the date of the following events shall also be recorded in the site diary:

- Start and finish of any construction/engineering works within the site boundary;
- Start and finish of any management processes carried out on site;
- All maintenance;
- Breakdowns;
- Emergencies and environmental incidents and remedial actions taken;
- Problems with waste received and action taken;
- Evidence of all waste entering and leaving the site; where from, date, time, weight;
- Site inspections - who carried out the site inspection, date and time, why and the consequent actions carried out by the operator;
- Attendance of technically competent management on site and the date and time of departure of the technically competent manager;
- Despatch of records to Natural Resources Wales;
- Extreme weather conditions; and
- Complaints and actions taken.



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DRAWINGS AND PLANS

Refer to [MPP5](#) for current Site Drawings and Plans

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MPP4 Accident/Pollution Incident Management Plan

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MPP4 Accident/Pollution Incident Management Plan

Further help is available from [PPG21: Pollution incident response planning](#) (See section 7)

Created by: S. Watcham Date: 22/01/16

Review Date: 21/01/17 Version: 1.2

Accident / Pollution Incident Management Plan Contents

A – Site Plan

B – Key Site and Emergency Contacts

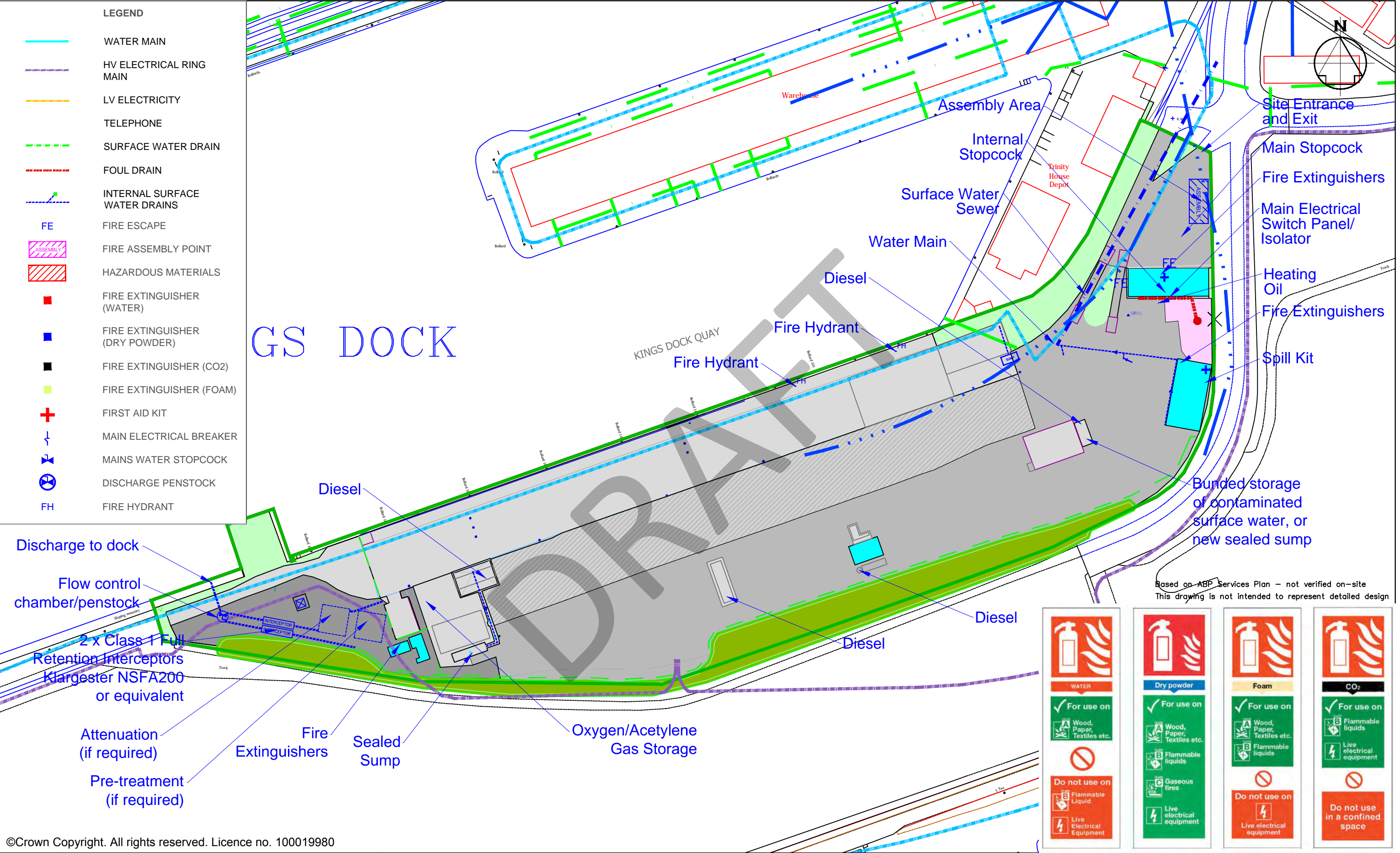
C – List of Substances and Storage Facilities

D – Preventing Accidents / Incidents... and what to do if they happen.

A – Site Plan

Insert site plan showing location of the following items:

- **Site entrances and exits** available to the emergency services
- **Buildings**; the buildings and other main constructions
- **Drainage**; including
 - foul drainage (marked in red),
 - surface water drainage (marked in blue) showing
 - the direction of flow and
 - the discharge points to the sewer, watercourse or soakaway.
 - The location of manhole covers and drains,
 - The location of stop and diverter valves and interceptors
- **Service mains**; the routes of
 - water supply, gas, electricity)
 - mains water stop tap, and gas and electrical supply isolating valves / switch.
- **Storage of hazardous materials**; e.g. oil and fuel tanks, chemical stores, raw materials, waste materials etc.
- **Process lines**; location and direction of main process lines/pipes.
- **Accident and emergency response items**; such as fire extinguishers, fire hydrants, fire water tanks / ponds, spill kits, sand bags, alarms, first aid kit etc.
- **Vulnerable receptors**; on site or adjacent receptors that could be affected by the site operations, such as porous / unmade ground, watercourses, springs, boreholes, ecologically sensitive sites, residential properties, schools, offices, hospitals etc.
- **Pollution control points**; such as inspection or monitoring points, bunds,
- **Treatment**; location of any on site trade effluent or sewage effluent treatment plant.



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AMENDMENTS	REV	DETAILS	DATE	MADE BY	CHKD BY
	REF				
	A	UPDATED LAYOUT, DRAINAGE AND BOUNDARY FOR PERMIT VARIATION	20/02/16	SCW	AS



TECHNIA ENVIRONMENT AND PLANNING
SUITE 4, ST. MARGARET'S PARK
PENGAM ROAD, ABERBARGOED, CF81 9FW
TEL: 01443 821619
EMAIL: PLANNING@TEPL.EU

EPS MR LTD				Drawn	SW	Scale
EMERGENCY PLAN				Ch'kd	BS	1:1,250
				Appr'd	BS	@A3
				Date	08/12/15	
Job No.	EPS	Drg No.	10934 - 000 - H			



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B – Key Site and Emergency Contacts

SITE DETAILS			
Location:	EPS Materials Recovery, Graigola Wharf, King's Dock, Swansea		
Postcode:	SA1 8QT		
Site Access Grid Reference:	Docks (SS 69213 92974 and SS 67411 92769) Site (SS 68282 92795)		
SITE CONTACTS	Name	Office Hours (specify)	Out of hours
Managing Director:	Richard Phillips	01792 645101	07836 337899
General Manager:	Adrian Stewart	01792 645101	07774 903373
Site Manager:	Darren Stillman	01792 645101	07527 325336
Site Supervisor:	N/A	N/A	N/A
Security Contact:	ABP	01792 645101	N/A
Landowner / Agent:	ABP	01792 645101	N/A
EMERGENCY SERVICES		Office Hours	Out of hours
Emergency		999	999
Medical: Welsh Ambulance Services NHS (Central & West Region)		01792 562900	111 (non-emergency)
Police: South Wales Police 'H' Division - Swansea		01792 456999	101 (non-emergency)
Fire: Mid & West Wales Fire and Rescue – Swansea County Command		0370 6060 699	0370 6060 699
REGULATORS		Office Hours	Out of hours
Health and Safety Executive (HSE)		0345 300 9923	0151 922 935
Local Authority:		01792 635600	01792 841654 (Highways only)
Natural Resources Wales (Local)		01792 326450	N/A
Natural Resources Wales (24hr emergency)		0800 807060	0800 807060
UTILITY / KEY SERVICES	Name	Office Hours	Out of hours
Water undertaker:	Dwr Cymru	0800 052 0130	0800 052 0130
Sewerage undertaker:	Dwr Cymru	0800 052 0130	0800 052 0130
Gas supplier:	N/A	N/A	N/A
Electricity supplier:	ABP	01792 645101	N/A
Oil supplier:	Oil4Wales	02920 674 910	N/A
Fuel supplier:	Oil4Wales	02920 674 910	N/A
Chemical supplier:	Various	N/A	N/A
Oil spill contractor:	N/A	N/A	N/A
Maintenance contractor:	N/A	N/A	N/A
Electrician:	N/A	N/A	N/A
Plumber:	N/A	N/A	N/A
Locksmith:	N/A	N/A	N/A
Joiner:	N/A	N/A	N/A
OTHER KEY CONTACTS	Name	Office Hours	Out of hours
Head Office:	N/A	N/A	N/A
Adjacent landowners:	ABP	01792 645101	N/A
Neighbours:	Stenor	01792 474377	N/A
Specialist advisors:	Geotechnology (Environmental)	01639 775 293	N/A



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C - List of Substances and Storage Facilities

The following is a list of liquids, powders etc. that are stored on site and could be harmful to the environment if they escape.

Material	Maximum Quantity	Type and size of storage	Type and size of Secondary Containment
Heating oil	1,500 litres	Plastic tank	External integrated plastic bund >110% of capacity
Diesel (Main Storage)	5,000 litres	Single skin steel tank	External concrete bund >110% of capacity
Diesel (Baler)	5,000 litres	Plastic tank	External integrated plastic bund >110% of capacity
Diesel (Shears)	1,500 litres	Plastic tank	External integrated plastic bund >110% of capacity
Diesel (Shears)	1,500 litres	Plastic tank	External integrated plastic bund >110% of capacity
Petrol	None	N/A	N/A
Engine oil	None	N/A	N/A
Engine Coolant	None	N/A	N/A
Screen Washer Fluids	None	5 litre plastic containers	Metal container
Workshop Oil	50 litres	N/A	N/A
Caustic Chemicals, Acids, etc	None	N/A	N/A



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D – ACCIDENT MANAGEMENT PLAN

Foreseeable Emergency Situation	Likely Scenarios	Emergency Response Procedure
Pollution Incident	Pollution of land, groundwater, surface water and air.	<p>Follow responses as detailed below and refer to the following Procedures for further guidance:</p> <ul style="list-style-type: none"> - PR1 - Accident/Pollution Incident Procedure - PR2 - Emergency Incidence Procedure – Fire & Explosion - PR3 - Emergency Incidence Procedure – Spillage - PR4 - Emergency Incidence Procedure – Flood - PR5 - Emergency Incidence Procedure – Air Emissions - PR6 - Emergency Incidence Procedure – Discovery of Suspicious Items
Spillage	From Vehicles	<p>In the event of a Spillage or leak that may occur from a vehicle during carriage or when stationary, the members of the vehicle crew shall take the following actions where safe and practicable to do so:</p> <ul style="list-style-type: none"> - Apply the braking system, stop the engine and isolate the batter by activating the master switch where available - Avoid sources of ignition, in particular, do not smoke or switch on any electrical equipment - Inform the appropriate emergency services, giving as much information about the incident and substances involved as possible. - Put on warning vest and place the self-standing warning signs as appropriate; - Keep transport documents readily available for responders on arrival. - Do not walk into or touch spilled substances and avoid inhalation of fumes, smoke, dusts and vapours by staying up wind; - Where appropriate and safe to do so, use on-board equipment to prevent leakages into aquatic environment or the sewage system and to contain spillages; - Remove any contaminated clothing and used contaminated protective equipment and dispose of it safely; - Move away from the vicinity of the spillage, advise other persons to move away and follow the advice of the emergency services.
Spillage	From Site IBCs	<p>In the event of a Spillage on-site from IBC's or Drums the yard operatives shall take the following actions where safe and practicable to do so:</p> <ul style="list-style-type: none"> - Immediately alert area occupants and supervisor, evacuate the area if necessary; - If there is a fire or medical attention needed, contact emergency services on 999 - Attend to any people who may be contaminated , contaminated clothing must be removed immediately and the skin flushed with copious amounts of water until emergency assistance arrives; - If a volatile, flammable material is spilled, immediately warn everyone, control sources of ignition and ventilate the area. - Personal Protective Equipment to be used as appropriate to the Hazards. Refer to the Material Safety Data Sheet or other references to information. - Protect floor drains and other means for environmental release. Spill socks and absorbents may be placed around drains as needed. (Absorbent materials are located in the non-ferrous processing building) - Loose spill control materials should be distributed over the entire spill area, working from the outside, circling to the inside. This reduces the chances of splash or spread of the spilled chemical. - When spill materials have been absorbed use brush and scoop to place materials in appropriate container. Polyethylene bags may be used for small spills. 5 gallon drums or 20 gallon drums with polyethylene liners may be appropriate for larger quantities.



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Foreseeable Emergency Situation	Likely Scenarios	Emergency Response Procedure
		<ul style="list-style-type: none"> - Complete a Hazardous Waste sticker, identifying the material and affix onto the container. Spill control materials will probably need to be disposed of as hazardous waste; - Decontaminate the surface where the spill occurred using suitable detergents and water, when appropriate.
Hazardous Waste Spillage	Vehicles during haulage	<p>If the vehicle carrying Hazardous Waste material is involved in a road accident and the material being carried is released the following immediate actions should be taken:</p> <ul style="list-style-type: none"> - Stop the engine; call the Emergency Services if applicable. - Put on protective clothing where applicable and try to contain only a small spillage. - Ensure no one is smoking nearby or there are no other sources of ignition. - Warn other road users and pedestrians about the dangers and keep them upwind. - Where applicable notify the Dangerous Goods Safety Advisor (<p>Additional actions to be taken by the driver:</p> <ul style="list-style-type: none"> - Perform any additional actions specified on your Tremcard for the goods being carried to prevent escalation of any minor spillage or leakage (only without personal risk) - Remove instructions in Writing (Tremcard) from the cab and give to emergency services. - Contain any minor spillages and keep it out of the drains - Contact the office to inform them of the incident, including load details, location etc. - All details of the incident / accident need to be passed on to the Dangerous Goods Safety Advisor
Fire	At Site	<p>When encountering a fire, firstly notify the Emergency Services by activating the fire alarm and/or calling 999 to provide details of the situation:</p> <ul style="list-style-type: none"> - Extinguish the fire if you have been trained and it is safe to do so (Fire extinguisher locations will be identified in staff induction) - Make sure that you have a safe exit from the fire area. - If you are unable to extinguish the fire, leave the area immediately and activate the fire alarm. <p>When evacuating your building or work area:</p> <ul style="list-style-type: none"> - Stay calm, do not rush, and do not panic. - If safe and time permits, close your office doors and windows, but do not lock them. - As you exit, warn others to evacuate. - Proceed to the designated Emergency Assembly Point and report to your Evacuation Roll Caller.
Fire	Vehicle	<p>When encountering a fire, firstly notify the Emergency Services by calling 999 to provide details of the situation:</p> <ul style="list-style-type: none"> - Stop the vehicle immediately and engage handbrake, switch off engine and put vehicle into a high gear in case of accidental engine re-ignition. - If you believe the engine is on fire release the bonnet catch if it is safe to do so, but DO NOT OPEN THE BONNET! - The priority is to get any passengers if any out of the vehicle and a safe distance away from the fire. - When the emergency services arrive, inform them if there is any flammable hazardous material on the load e.g. gas canisters, aerosol cans etc - Contact the office to inform them of the incident, including load details, location etc.



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Foreseeable Emergency Situation	Likely Scenarios	Emergency Response Procedure
Flood	Sea inundation Localised flooding due to drain blockage or burst water main	<p>In the event of a flood the following will be undertaken:</p> <ul style="list-style-type: none"> • All electricity to site turned off if safe to do so and staff instructed to stay away from electrical outputs and devices. • Water mains turned off if flood is as a result of burst/broken water pipe. • Evacuation alarm sounded. • Site evacuated and staff to report to assembly point at Front of Office • Visitor's books and employee clock in reports checked to ensure everyone is off site and at the assembly point. • Emergency services, Natural Resources Wales and other related agencies notified. <p>Before site re-occupation, potential hazards and issues to be identified and guidance sought from Natural Resources Wales and Local Emergency Services.</p>
Vehicles Breakdowns	Breakdown	<p>The procedure for vehicle breakdown is shown below:</p> <ul style="list-style-type: none"> - Inform office that vehicle has broken down - Provide exact location of breakdown, including any potential hazards e.g. vehicle on roundabout, vehicle on sharp bend etc. - Provide vehicle registration number, name and contact telephone number; - Briefly give summary of cause of breakdown e.g. engine misfiring, excessive smoke etc. - In the case of tyre failure, provide tyre size, position of tyre on vehicle e.g. n/s front etc. - Make office aware of whether load is hazardous, perishable etc. - Remain with vehicle at all times until breakdown assistance arrives
Vehicle Accidents		<p>In the event of an accident which causes :</p> <ul style="list-style-type: none"> - injury to a third party - damage to a vehicle other than the vehicle you are driving - damage to property in or adjacent to a road (for example, a lamp post or fence) - injury to a domestic animal NOT carried in your vehicle. <p>the driver MUST stop and give the following information to any person having reasonable grounds to ask for it:</p> <ul style="list-style-type: none"> - own name and address - the name and address of EPS where based - vehicle registration number - the name and address of our insurers. <p>Where details are not exchanged, the driver must report the accident to any Police Station as soon as is reasonably practicable within 24 hours of the event. Please note that this does not mean you are entitled to wait 24 hours before reporting the incident.</p> <p>In the event of an accident no statement must be made in which any LIABILITY or FAULT is admitted. No OFFERS or PROMISES must be made to third parties.</p> <p>The name, address and insurance details of any third party involved in the accident must be obtained and if possible details of any witnesses.</p>



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Foreseeable Emergency Situation	Likely Scenarios	Emergency Response Procedure
		<p>Where the third party is to blame for the accident it is advisable to call the police who can verify position of vehicles, skid marks etc.</p> <p>It is advisable to take notes of the accident as soon as possible after it has taken place. If a camera is available, photographs should be taken.</p> <p>The driver of the vehicle must report the accident immediately to his Manager, verbally, and on return to the site a motor vehicle Accident Report Form must be completed and returned to the responsible Manager.</p> <p>If the accident is serious, the manager should attend the scene and assist with the gathering of information.</p> <p>The Manager must check the form is completed correctly and signed before forwarding to the Insurance Department, together with a copy of the tachograph chart from the vehicle.</p>
Injury	<p>Minor Injury</p> <p>Major Injury</p>	<p>In the event of a minor injury or major injury occurring on site the emergency procedure is shown below:</p> <ul style="list-style-type: none"> - Initial response is to assess the Injury to the individual and provide medical aid as appropriate whether the trained site Health and Safety officer can provide medical aid - Prevent secondary accidents occurring by neutralising equipment/machinery that caused accident. - Emergency services contacted if individual requires hospital attention. - The incident will then need to be investigated following the relevant Accident/Incident reporting & Investigation procedure (see document F013) and reported as a Minor or Major injury to prevent the injury occurring in future.
Plant & Property Damage	<p>Property Insurance - Plant & Property Damage/Loss</p> <p>Loss or damage to EPS Plant</p> <p>Loss or damage to hired in plant</p>	<ul style="list-style-type: none"> - In the event of damage, fire, theft, storm or flood, at any Company premises or damage to plant on site, the Manager responsible for the premises or plant must inform the Insurance Department. - Note: The Police must be informed in all cases where a criminal act has been committed and a crime report number obtained. - The Manager must obtain quotations for the repairs/replacement and forward to the Insurance Department. - When the invoice is received it must be checked and authorised before passing for payment by the Manager. - Copies of invoices must be sent to the Insurance Department to allow reclaiming from Insurers or third parties where possible. - The hirer must be advised immediately and the conditions of hire checked to confirm liability. Note: Conditions of Hire are often not in our favour and great care is required BEFORE commencing a hire. Advice should be sought from Manager.
Failure of containment facilities due to land movement, impact, corrosion etc.	Contamination of land, drains, groundwater and watercourses.	<ul style="list-style-type: none"> - Spill response as described above.



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Foreseeable Emergency Situation	Likely Scenarios	Emergency Response Procedure
Due to failure of supply; water, electricity, gas supply and of sewerage system. Due to utility supply being struck and broken / cut.	Flooding, explosion with subsequent contamination of land, drains, groundwater and watercourses.	- Flood and fire procedure as described above.
Unauthorised entry and tampering or malicious damage to property, plant and equipment.	Contamination of land, drains, groundwater and watercourses.	- Spill response as described above



**EPS Materials Recovery Ltd
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Manuals, Policies and Plans

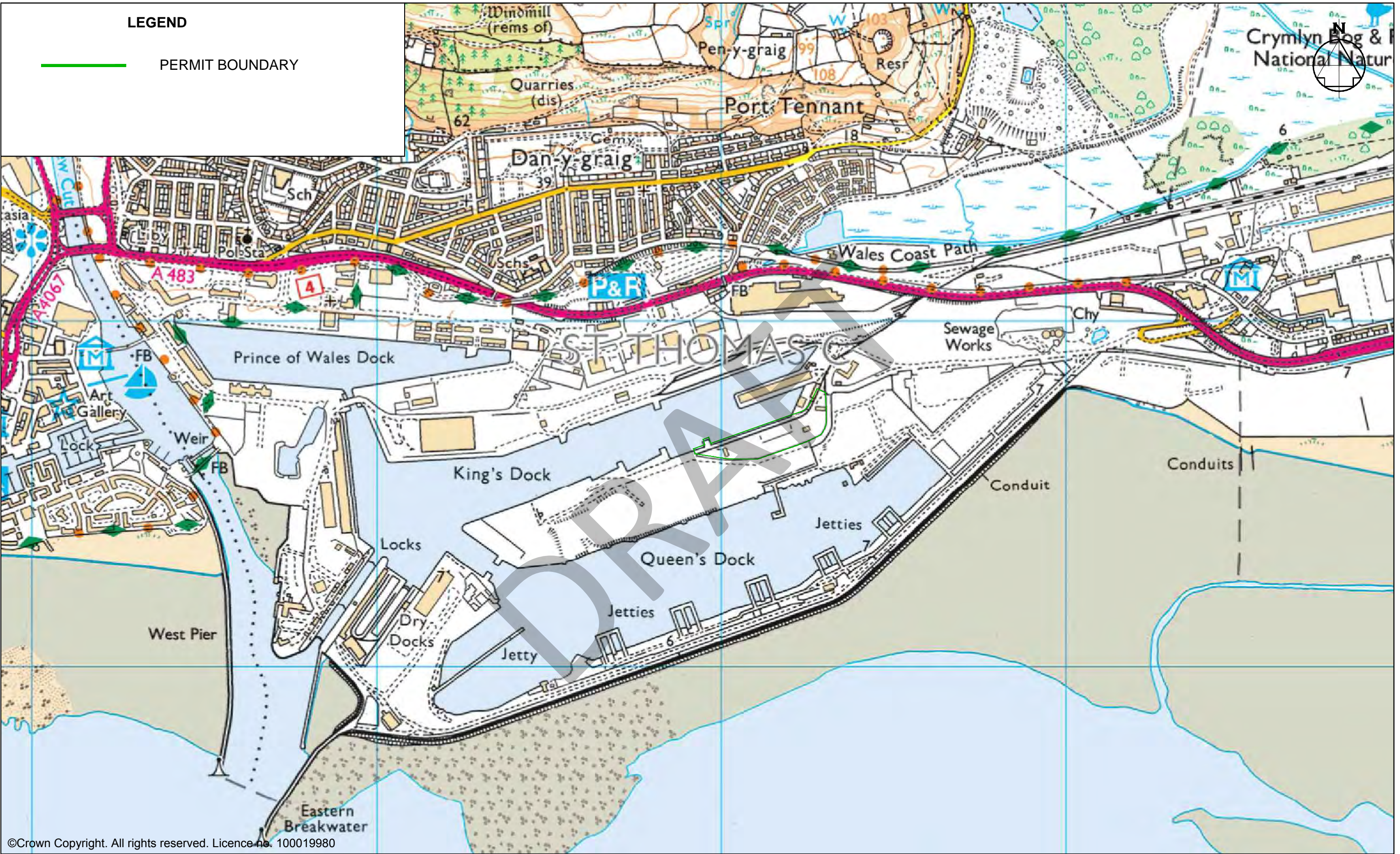
Controlled Document No.	
Issue	1.2
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MPP5 Site Drawings and Plans

DRAFT

LEGEND

PERMIT BOUNDARY



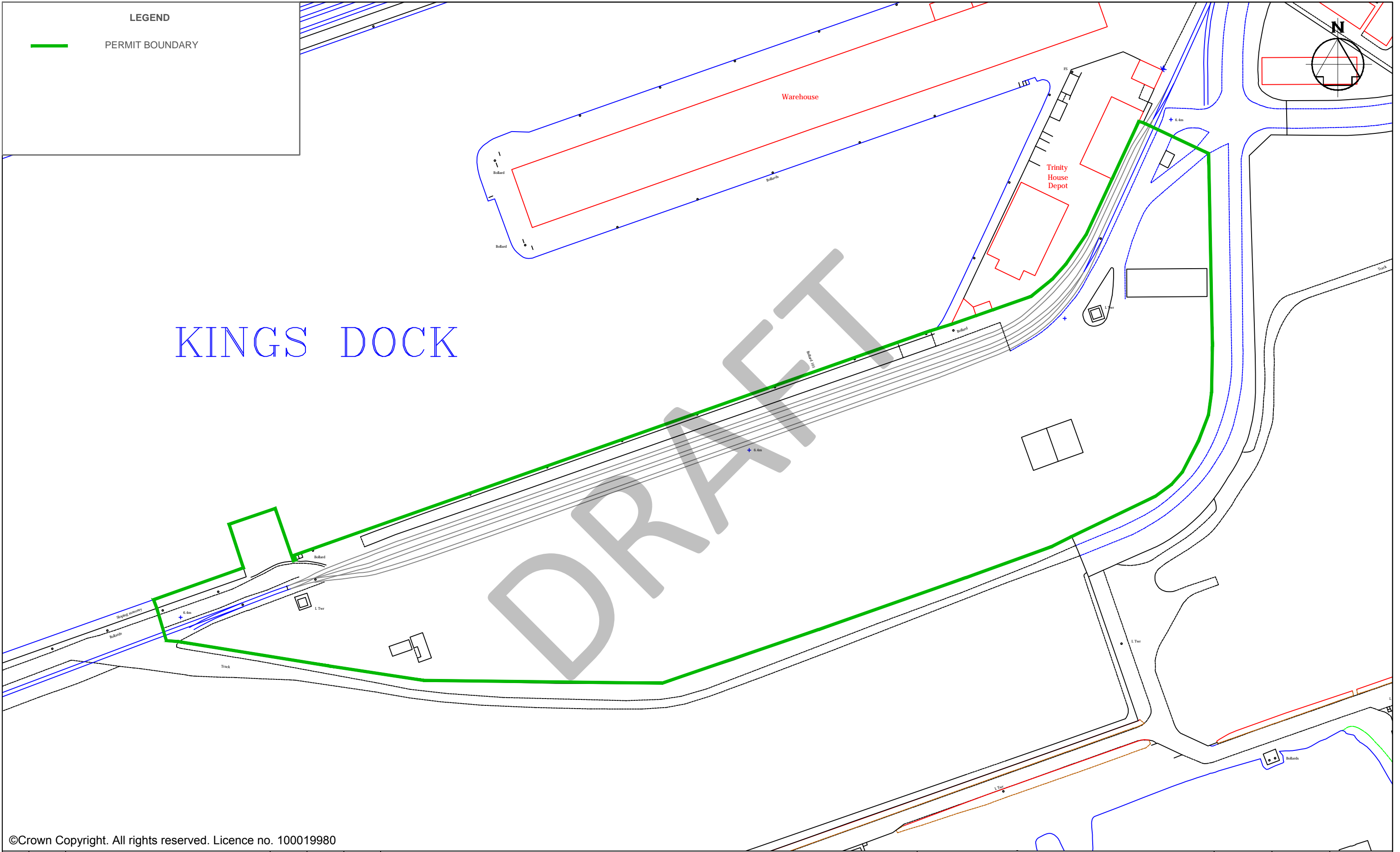
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AMENDMENTS	REV	DETAILS	DATE	MADE BY	CHKD BY
	REF				
	A	UPDATED SITE BOUNDARY FOR PERMIT VARIATION	20/02/16	SCW	AS



TECHNIA ENVIRONMENT AND PLANNING
SUITE 4, ST. MARGARET'S PARK
PENGAM ROAD, ABERBARGOED, CF81 9FW
TEL: 01443 821619
EMAIL: PLANNING@TEPL.EU

EPS MR LTD				Drawn	SW	Scale 1:10,000
				Ch'kd	BS	
SITE AND SURROUNDING AREA				Appr'd	BS	@A3
				Date	08/12/15	
Job No.	EPS	Drg No.	10934 - 000 - A			



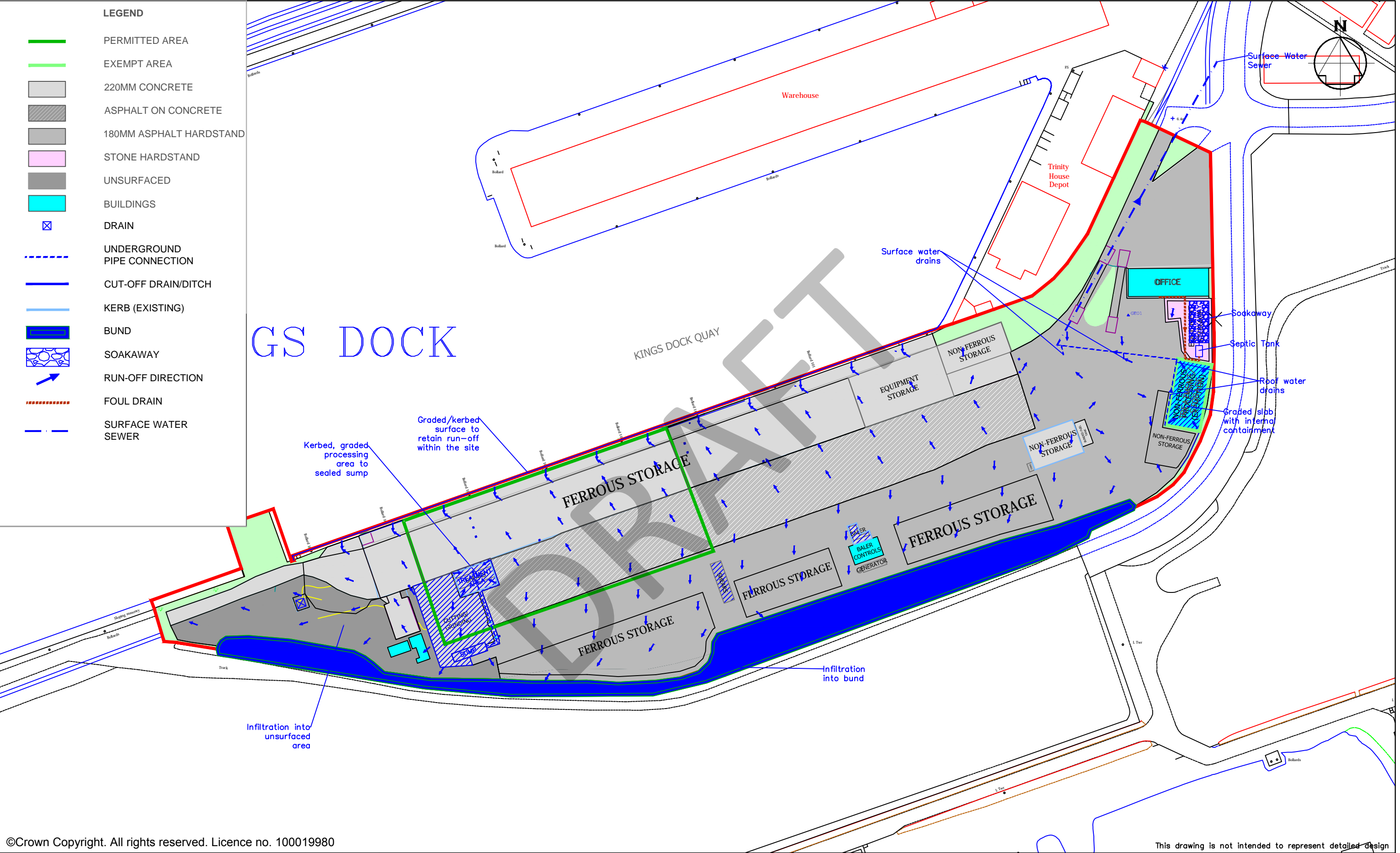
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	REF				
	A	UPDATED SITE BOUNDARY FOR PERMIT VARIATION	20/02/16	SCW	AS



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TEL: 01443 821619
EMAIL: PLANNING@TEPL.EU

EPS MR LTD				Drawn	SW	Scale 1:1,250
				Ch'kd	BS	
SITE (PERMITTED AREA) PLAN				Appr'd	BS	@A3
				Date	08/12/15	
Job No.	EPS	Drg No.	10934 - 000 - B			



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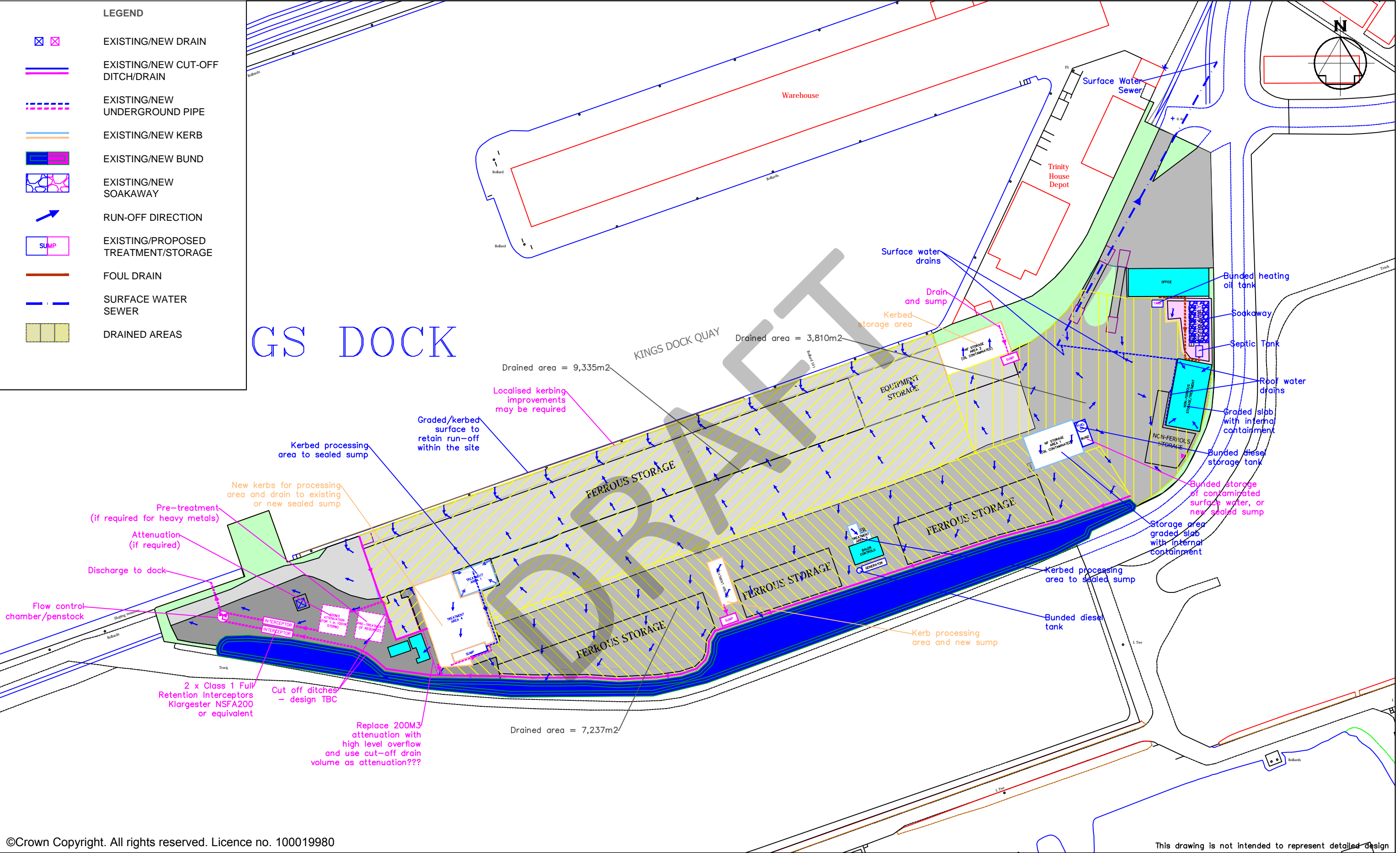
This drawing is not intended to represent detailed design

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	REF				



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TEL: 01443 821619
EMAIL: PLANNING@TEPL.EU

EPS MR LTD				Drawn	SW	Scale 1:1,250
				Ch'kd	BS	
DRAINAGE PLAN (SITE AT 22/01/16)				App'r'd	BS	@A3
				Date	22/01/16	
Job No.	EPS	Drg No.	10934 - 000 - D			



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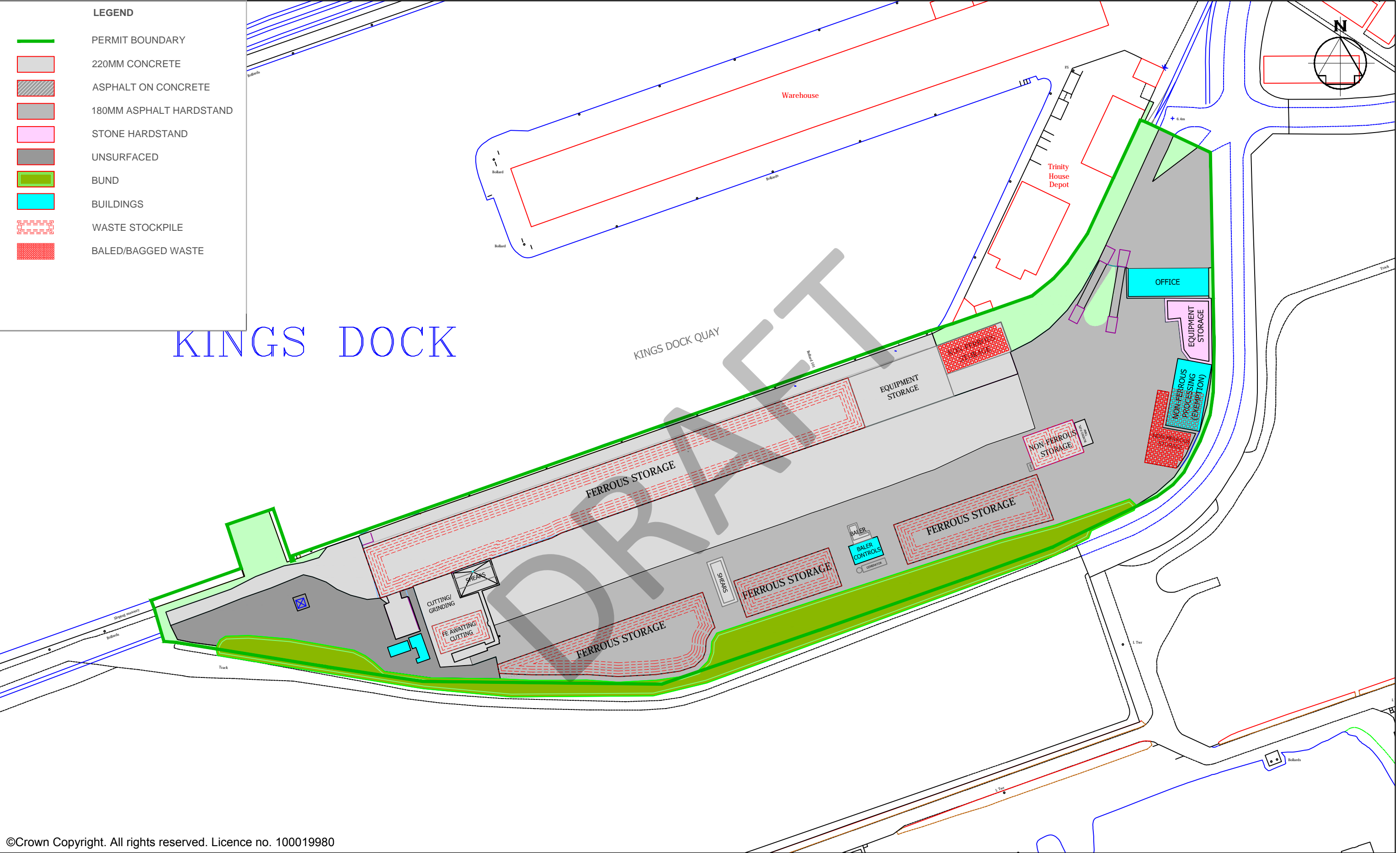
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AMENDMENTS	REV	DETAILS	DATE	MADE BY	CHKD BY
	REF				
	A	FOR PERMIT VARIATION. UPDATED BOUNDARY AND LAYOUT. PROPOSED DRAINAGE SCHEME ADDED (SUBJECT TO DETAILED DESIGN)	20/02/16	SCW	AS



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SUITE 4, ST. MARGARET'S PARK
PENGAM ROAD, ABERBARGOED, CF81 9FW
TEL: 01443 821619
EMAIL: PLANNING@TEPL.EU

EPS MR LTD				Drawn	SW	Scale
DRAINAGE PLAN (PROPOSED)				Ch'kd	BS	1:1,250
				Appr'd	BS	@A3
				Date	08/12/15	
Job No.	EPS	Drg No.	10934 - 000 - D (Rev. A)			



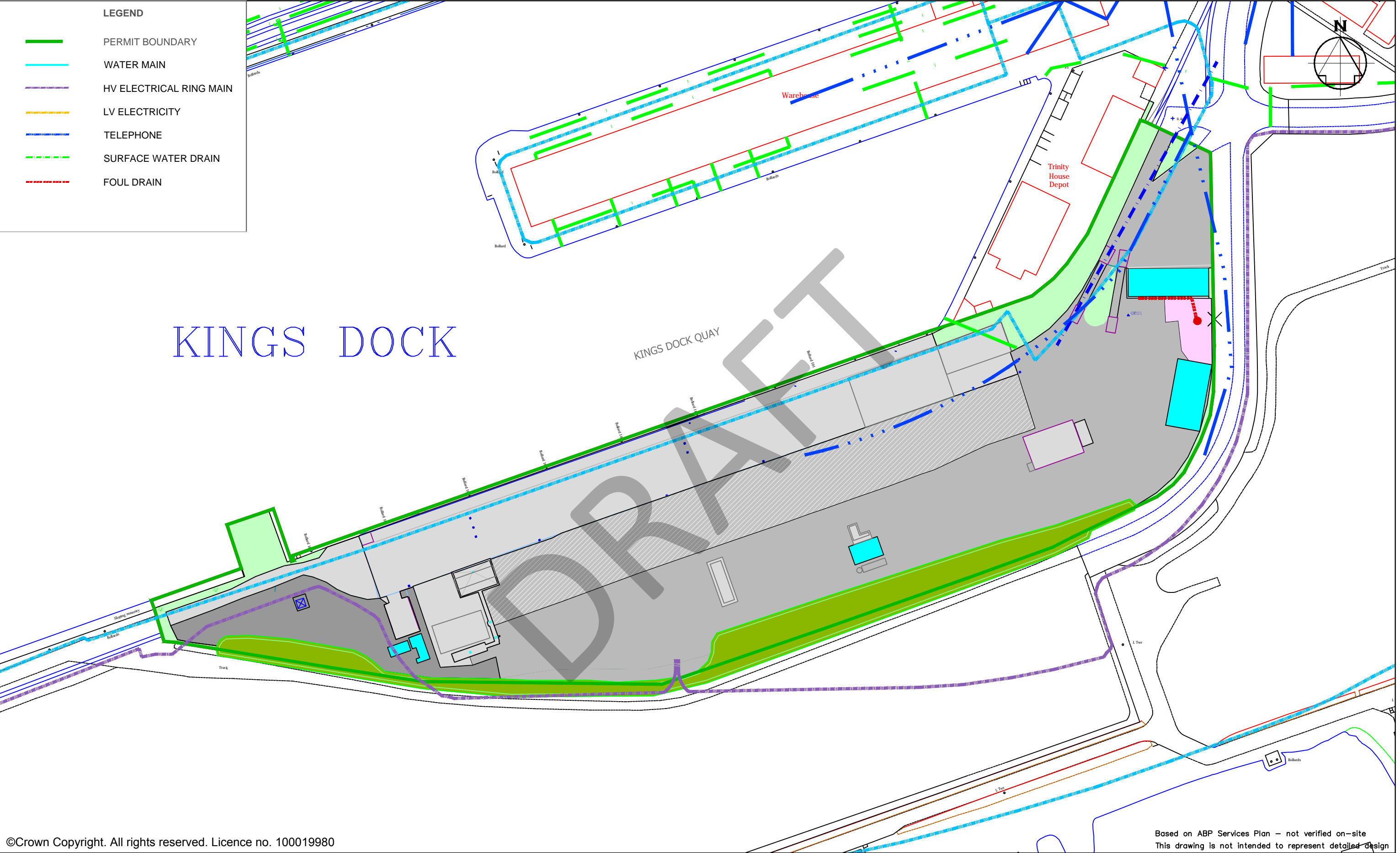
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AMENDMENTS	REV	DETAILS	DATE	MADE BY	CHKD BY
	REF				
	A	UPDATED LAYOUT FOR PERMIT VARIATION	20/02/16	SCW	AS



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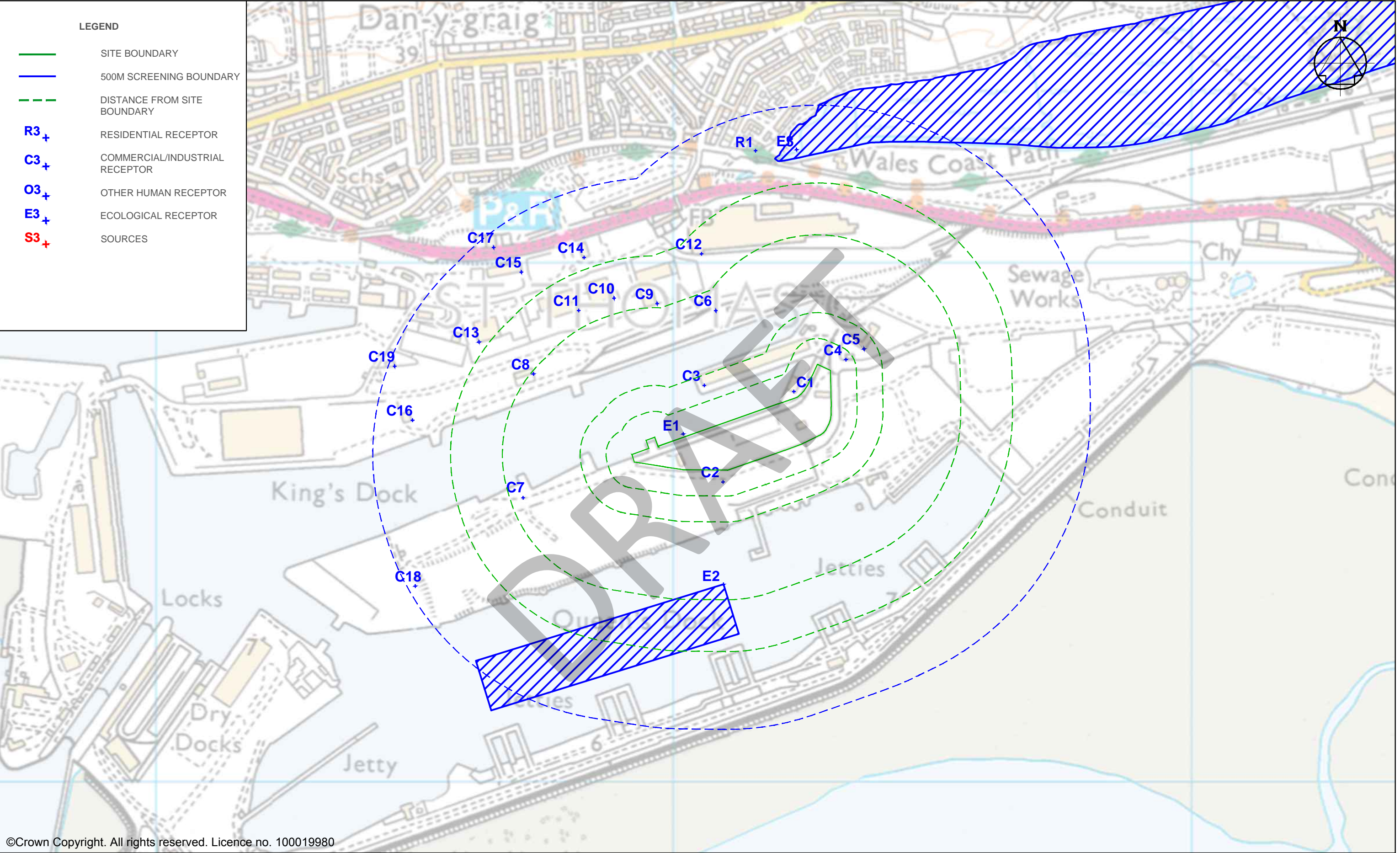
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				Ch'kd	BS	
STORAGE PLAN				Appr'd	BS	@A3
				Date	08/12/15	
Job No.	EPS	Drg No.	10934 - 000 - E			



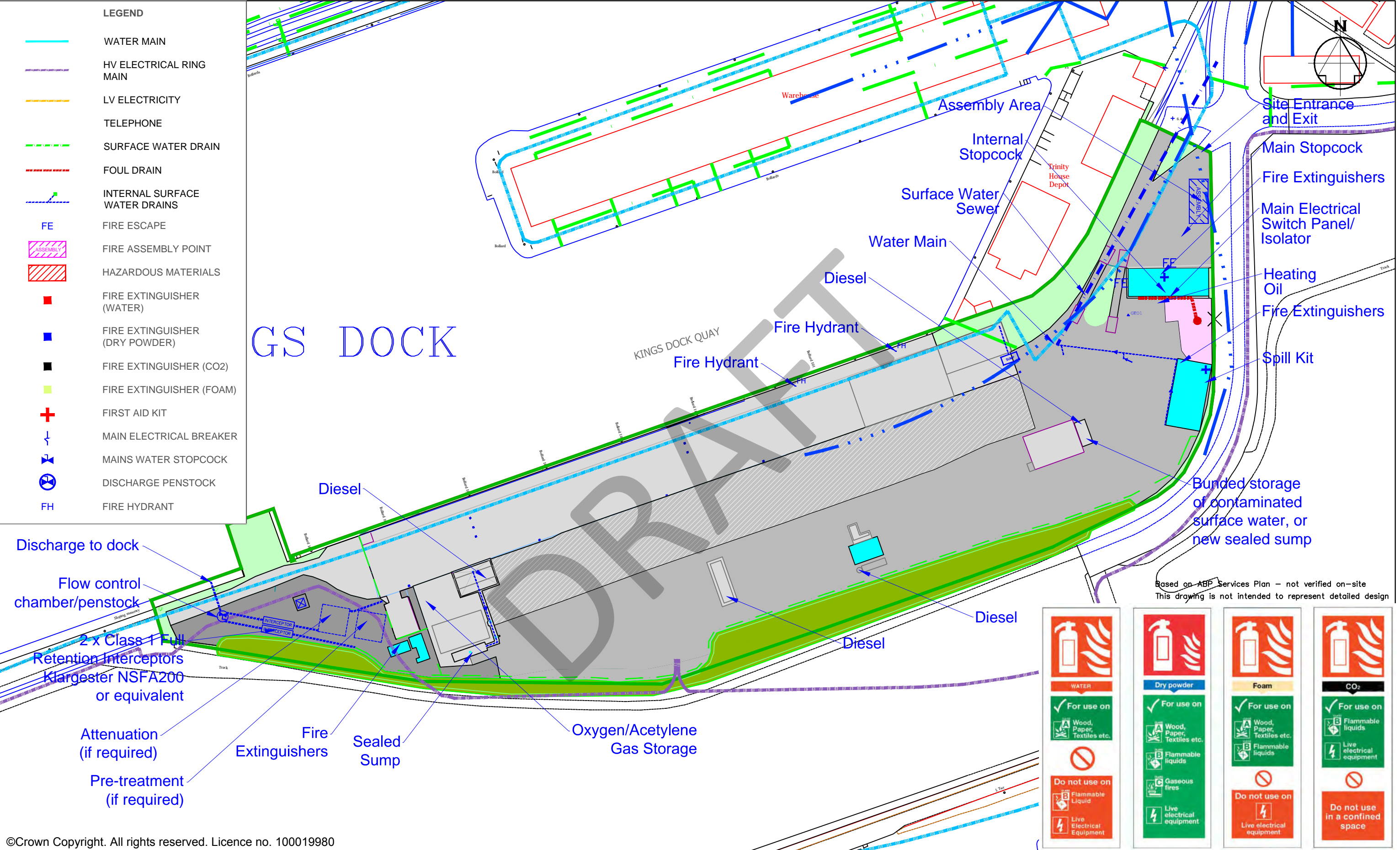
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Based on ABP Services Plan – not verified on-site
This drawing is not intended to represent detailed design

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	REF										Ch'kd	BS	1:1,250
	A	UPDATED LAYOUT FOR PERMIT VARIATION	20/02/16	SCW	AS			SERVICES PLAN			Appr'd	BS	@A3
											Date	08/12/15	
								Job No.	EPS	Drg No.	10934 - 000 - F		



AMENDMENTS	REV REF	DETAILS	DATE	MADE BY	CHKD BY	 <div>TECHNIA ENVIRONMENT AND PLANNING SUITE 4, ST. MARGARET'S PARK PENGAM ROAD, ABERBARGOED, CF81 9FW TEL: 01443 821619 EMAIL: PLANNING@TEPL.EU</div>	EPS MR LTD				Drawn	SW	Scale
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	RECEPTOR SCREENING				App'r'd		BS	@A3					
					Date		08/12/15						
	Job No.	EPS	Drg No.	10934 - 000 - G									



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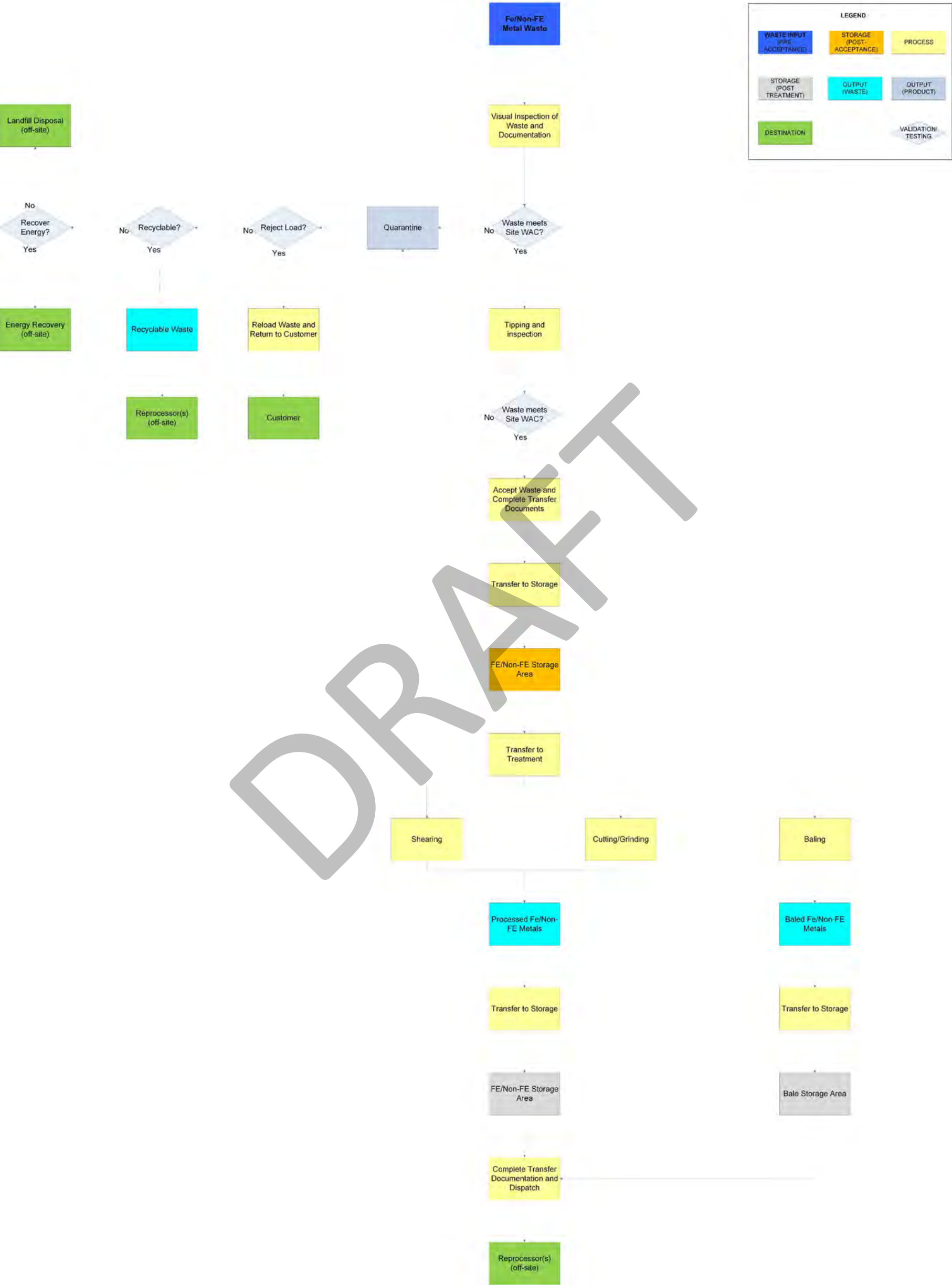
AMENDMENTS	REV	DETAILS	DATE	MADE BY	CHKD BY
	REF				
	A	UPDATED LAYOUT, DRAINAGE AND BOUNDARY FOR PERMIT VARIATION	20/02/16	SCW	AS




TECHNIA ENVIRONMENT AND PLANNING
SUITE 4, ST. MARGARET'S PARK
PENGAM ROAD, ABERBARGOED, CF81 9FW
TEL: 01443 821619
EMAIL: PLANNING@TEPL.EU

EPS MR LTD				Drawn	SW	Scale
EMERGENCY PLAN				Ch'kd	BS	1:1,250
				Appr'd	BS	@A3
				Date	08/12/15	
Job No.	EPS	Drg No.	10934 - 000 - H			

Process Flowchart



AMENDMENTS	REV	DETAILS	DATE	MADE BY	CHKD BY	EPS MR LTD KINGS DOCK, SWANSEA, SA1 8QT				PROCESS FLOWCHART				
	REF													
										TECHNIA ENVIRONMENT AND PLANNING LIMITED SUITE 4, ST. MARGARET'S PARK PENGAM ROAD, ABERBARGOED, CF81 9FW TEL: 01443 821619 EMAIL: PLANNING@TEPL.EU		Drawn	SW	Scale
												Ch'kd	BS	NTS
												App'r'd	BS	
												Date	08/12/15	
						Job No.	EPS			Drg No.	10934-000-I			



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PR2 - Emergency Incident Procedure – Fire & Explosion
PR3 - Emergency Incident Procedure – Spillage
PR4 - Emergency Incident Procedure – Flood
PR5 - Emergency Incident Procedure – Air Emissions
PR6 - Emergency Incident Procedure – Discovery of Suspicious Items
PR7 – Waste Acceptance Procedure
PR8 - Procedure for Assessment and Implementation of Training Needs, Competence and Awareness
PR9 – Maintenance Procedure
PR10 – Procedure for Recording of Staff Responsibilities
PR11 – Procedure for Recording and Reporting of Environmental Incidents
PR12 – Complaints Procedure



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PR1 Accident/Pollution Incident Procedure

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PR1 - Accident/Pollution Incident Procedure

Contents

- 1 Introduction**
- 2 Environmental Incidents**
- 3 Pollution of the Environment**
- 4 Environmental Risk Assessment**
- 5 Emergency Site Plan**
- 6 Emergency Procedures**
- 7 Emergency Response Materials**
- 8 Corrective and Preventative Actions and Reporting**
- 9 Amendment of Procedures**
- 10 Records**
- 11 Reference Documents**

Introduction

Scope

This procedure is to be used by all employees dealing with potential or actual emergency environmental incidents which could lead to pollution of the environment, or danger to human health.

Purpose

This procedure describes the requirements to manage and report environmental incidents and emergencies in order to minimise the impact on the environment. This is necessary to prevent pollution, identify and manage risks, and protect the environment.

Environmental Incidents

Environmental incidents are defined as any actual or potential threat to the environment, such as spills or leaks of chemicals, sludges or wastes, tank ruptures or leaks, contamination of land, vandalism resulting in a threat to the environment, process failure resulting in a potential or actual loss of compliance. This procedure outlines the actions and reporting required in the event of such an incident.

Pollution of the Environment

In the case of an actual or potential environmental incident, Form FR9 Accident (and Incident) Record should be used to record the incident. All relevant sections should be completed and any negative impacts upon the environment should be listed together with actions taken to correct and prevent a reoccurrence. Completed forms should be forwarded to the Directors for review.

Environmental Risk Assessment

An Environmental Risk Assessment must be carried out for all permanent locations occupied or used, whether manned or unmanned to assess the level of risk to the environment from activities or operations carried out by the Company.

Accident/Pollution Incident Management Plan (Site Emergency Plan)

An Emergency Plan shall be completed for all sites operated by the Company. Plans will include a site plan showing the permanent locations of:

- Emergency exits
- Spill kits
- Fire extinguishers



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- First aid kits
- Drain covers (foul, surface water and interceptor) with direction of flow
- Any nearby watercourse that may be at immediate risk should a spillage occur

Refer to the site emergency plan for further detail (MPP4).

Emergency Procedures

Site-specific emergency procedures must contain all necessary information identified within the environmental risk register for the site. The plan must be communicated to all persons who are responsible for managing any incidents, and must be reviewed after any significant change in operations, activities or aspect/impact relating to that site. Plans should also be communicated to contractors working for or on behalf of the Company.

Emergency Procedures shall contain:

- Full postal address of the site including post code,
- Map reference of main entry point to the site
- Contact name of person responsible for the site
- Site Plan as above
- Copy of discharge consents, waste management licences and/or exemptions that may apply to the activities being undertaken
- HACCP Plans
- Other hazard information that may be relevant e.g. COSHH assessments

The plan shall cover all foreseeable emergency situations for normal and abnormal operating conditions. Emergency procedures identified will be tested at intervals appropriate to the level of risk and the nature of the activities being undertaken at the site. A schedule of emergency testing will be produced to identify test periods and dates when drills are expected to be carried out. Records of tests and any recommendations for improvement will be forwarded to the Company Secretary for storage.

Emergency Response Materials

Spill kits appropriate to the operations being undertaken should be available on site. Spill kits should be stored indoors or in suitable waterproof containers near locations where they may be required.

Spill kit contents should be inspected and recorded on a monthly basis. Where kits are opened, a checklist of contents should be drawn up and any items found to be missing should be replaced following inspection.

All site staff should be fully trained in the use of spill kits via toolbox talks, a record of this training will be kept on the company training matrix.

In the event of a spill or an incident, initial action should be to:

- Stop any contamination/spill at source.
- Contain the spill/area.
- Implement the requirements of the emergency procedures.
- Inform site supervisors/managers and the relevant external agencies e.g. Environment Agency.



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- Ensure that the health, safety and wellbeing of individuals or groups is not put at risk whilst managing the spill.

The secondary impacts of a spill should be contained by ensuring that:

- PPE, equipment and tools should be correctly decontaminated or disposed of.
- All contaminated containment materials are securely stored and labelled prior to correct disposal or treatment.

Corrective and Preventative Actions and Reporting

The appropriate corrective and preventative actions should be taken according to the site-specific emergency procedures. The table below shows the reporting routes for various incidents:

Incident	Form	Reporting Route
Potential pollution of the environment/near miss	Accident (and Incident) Record	Site Manager
Health & Safety hazard, near miss	Accident (and Incident) Record	Site Manager
H&S Accident (including RIDDOR)	Accident (and Incident) Record	Site Manager, HSE
Pollution of the environment	Accident (and Incident) Record	Site Manager, Natural Resources Wales
Minor spills	Accident (and Incident) Record	Site Manager/

Amendment of Procedures

Where a review of incidents indicates that a review of procedures is necessary, the designated person shall update the procedure and communicate any changes to all members of staff who may be affected by the changes.

Records

Records will be retained for the periods and disposed of by the methods identified in the following table:

Record	Reference	Retained by	Retention Time	Disposal Method
Environmental Incident Form	Accident (and Incident) Record	Head Office	5 years	Secure shred and recycle
Spill Training	Training Record	Head Office	2 years after employee has left company	Secure shred and recycle



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PR2 Emergency Incidence Procedure – Fire & Explosion

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PR2 - Emergency Incident Procedure – Fire & Explosion

The company's health and safety policy will be adhered to at all times and the following particular procedure will be the subject of training in order to ensure that all employees are aware of its contents and practised in its implementation.

In the event of a fire being detected at any location on the site, the following procedures are to be implemented without delay.

- Site Manager (or Senior Manager on site) to be notified immediately. Warning alarms sounded, all personnel directed to the designated assembly point.
- All visitors to the site (identified by checking the visitor's book) are to be escorted to the assembly point at the site entrance.
- Fire extinguisher/water spray will be directed at the fire, if it is safe to do so.
- Emergency services notified. Site Manager (or Senior Manager on site) to liaise with the emergency services and to provide any assistance requested.
- Environment Agency notified.
- If water sprays are utilised, all drainage channels will be banded to prevent run off.
- When the emergency has been dealt with to the satisfaction of the senior emergency officer present, a full report will be prepared.

In order to minimise the likelihood of a fire the following will be undertaken:

- Safe removal of ignition sources before flammable liquids removed.
- All flammable liquids will be kept in designated drums/tanks and will be clearly marked as to what they contain.
- Drums/tanks containing flammable liquids will be suitably banded and kept separate from any areas or equipment that could cause ignition and fire.
- Drums/tanks will undergo regular maintenance to ensure they are fit for purpose.
- Quantities of flammable liquids and materials on site kept to a minimum.
- Control release of vapours and prevent formation of flammable concentrations of vapour by ensuring adequate ventilation.
- Include separation distances on site where possible to prevent spread of fire and explosions to other plant, equipment and areas of the workplace.
- Take care when filling drums/tanks to reduce potential for spillage of flammable liquids.
- Use only appropriate deployment equipment to reduce likelihood of ignition and fire.
- Drip trays regularly cleaned to avoid build-up of flammable liquid.
- Tyre storage kept to a minimum.



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PR3 Emergency Incidence Procedure – Spillage

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PR3 - Emergency Incidence Procedure – Spillage

The safety policy will be adhered to at all times and the following particular procedure will be the subject of training in order to ensure that all employees are known and practised.

Possible pollution may result from accidental leaks or spillages from plant and vehicles or from liquid wastes discovered in loads and destined for quarantine as an unacceptable waste.

As well as identifying the possible source of pollution arising from liquid spillages, the potential target is identified as groundwater and any nearby water courses. The measures required to mitigate against the spillage causing such pollution are shown below.

Accidental Spillage – Steps to be taken

The following procedure is adopted for all accidental spillages of liquids whether inside buildings or in yard areas. Responsibility for any spillage lies with the first person noticing or finding the spill and they must take steps to contain it by taking action as follows:

- Any local discharge points e.g. drains are to be “blocked off” using sand bags (held in Non-ferrous Processing Building).
- Area surrounding spillage to be isolated by application of absorbent granules or clean sand (stored in Non-ferrous Processing Building) to prevent vehicles or personnel from passing over the area and thus spreading the spilled liquid.
- Site manager notified as soon as reasonably practical.
- Spill mats and spill kits, including absorbent granules are to be spread on the spilled liquid until all is absorbed.
- When all the liquid is absorbed, the contaminated absorbent granules and spill kits are loaded into a suitable drum for removal by a suitably licensed carrier to a licensed disposal or recovery facility.
- Details of the liquid spilled is noted for assistance with disposal/recovery for an action plan to prevent a similar occurrence being repeated.
- Every instance of spill MUST be recorded and investigated as an accident or incident.
- A detailed report is prepared for Natural Resources Wales officer who is informed of the incident as soon as reasonably practical.

In order to minimise the likelihood of spillages or leaks the following will be undertaken:

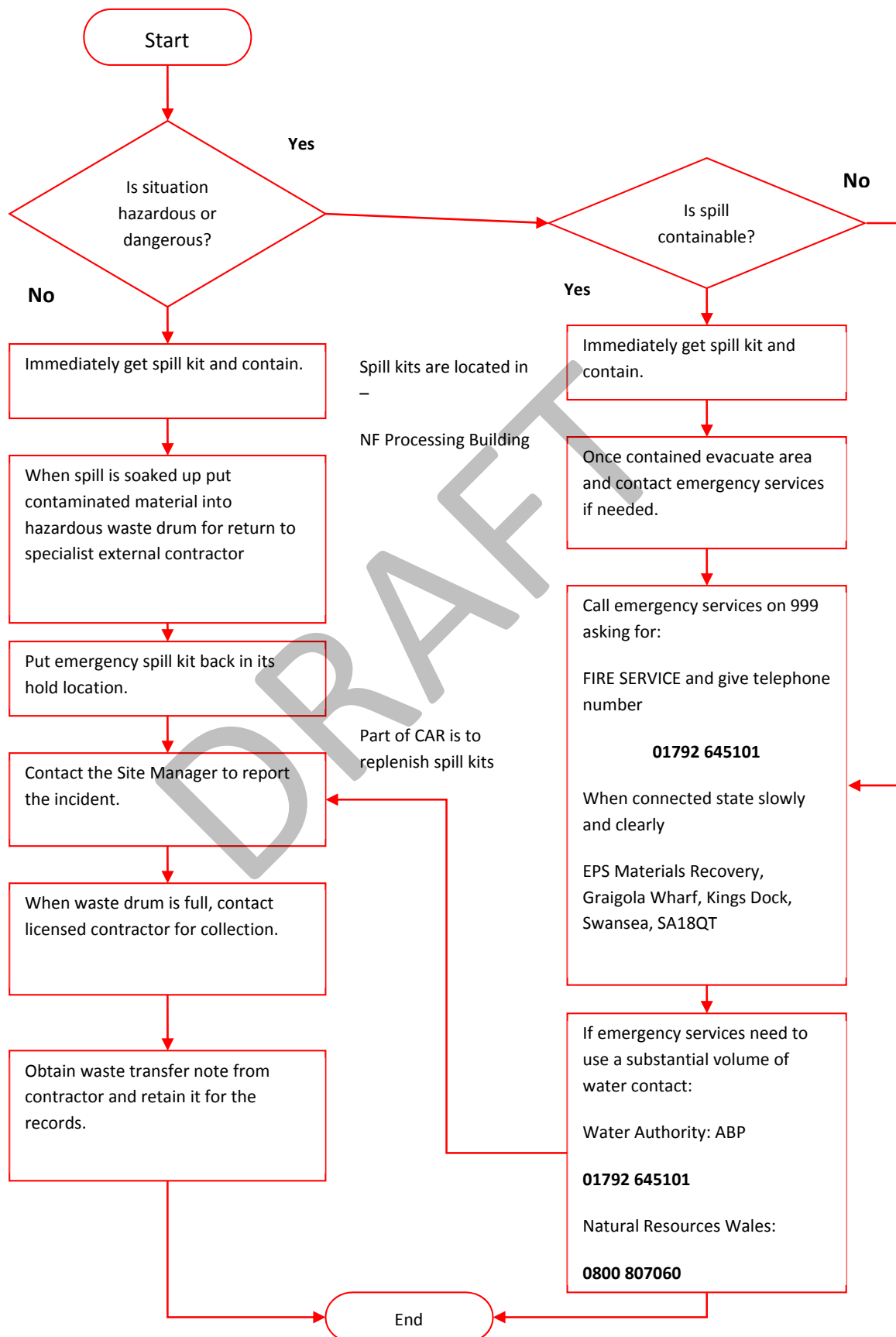
- All drums/tanks inspected daily for leaks and kept in bunded areas to prevent leaks from spreading.
- Drums/tanks to undergo regular maintenance to ensure they are fit for purpose.
- Liquid storage level checked daily/weekly to ensure capacity is not reached and overfilling does not occur.
- Use of appropriate equipment when removing and handling liquids to minimise likelihood of spillage.
- Use of drip trays when draining liquid and drip trays regularly cleaned.
- All personnel involved with draining of liquids suitable trained.
- Care taken when driving vehicles or moving objects close to storage drums/tanks to avoid damage and breaking of tanks.



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PR4 Emergency Incidence Procedure – Flood

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PR4 - Emergency Incidence Procedure – Flood

Although the site and surrounding areas benefit from flood defences, due to the site's location near the Severn Estuary there is the potential risk of flooding during heavy periods of rainfall or extremely high tides. There is also the potential for flooding as a result of burst/broken water pipes within the industrial estate and the site itself.

Were the site to flood, the nature of some of the materials on site e.g. hazardous fluids, lead, etc. could pose a significant hazard to the environment were they to enter the watercourse or contaminate the land.

The Environment Agency (EA)/Natural Resources Wales and Met Office provide flood warnings up to five days in advance.

	What it means	When it's used
 FLOOD ALERT	Flooding is possible. Be prepared	Two hours to two days in advance of flooding.
 FLOOD WARNING	Flooding is expected. Immediate action required	Half an hour to one day in advance of flooding
 SEVERE FLOOD WARNING	Severe flooding. Danger to life.	When flooding poses a significant threat to life.

If a severe weather or flood warning is issued the following will be undertaken:

- All hazardous materials secured or moved to a suitable and safe location where they will not be affected by flood water.
- Drains and pipes checked and cleared of any debris to aid flow of water.
- Sand bags placed around designated areas.
- Monitoring of local water levels and flood forecast undertaken.
- Electricity supply turned off if water levels increase or likely to increase to a dangerous level.

In the event of a flood the following will be undertaken:

- All electricity to site turned off if safe to do so and staff instructed to stay away from electrical outputs and devices.
- Water mains turned off if flood is as a result of burst/broken water pipe.
- Evacuation alarm sounded.
- Site evacuated and staff to report to assembly point at Front of Office/Welfare Building.
- Visitor's books and employee clock in reports checked to ensure everyone is off site and at the assembly point.
- Emergency services, Environment Agency and other related agencies notified.



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Before site re-occupation, potential hazards and issues will be identified and guidance from Natural Resources Wales and Local Emergency Services will be sought.

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PR5 Emergency Incidence Procedure – Emissions

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PR5 - Emergency Incident Procedure – Air Emissions

Releases of particulate matter (dust) and vapours in to the air can cause harmful effects including respiratory problems and fire.

Particulate matter such as dust can be released in to the air as a result of a number of activities on site including cutting, grinding, transfer of material and baling.

Vapours can be released in to the air as a result of removal of petrol/diesel, removal of other fluids and equipment.

The safety policy will be adhered to at all times and the following procedure will be the subject of training in order to ensure that all employees are aware of its contents and practised in its implementation.

In order to minimise the effects of the above mentioned the following will be undertaken:

- All procedures carried out in accordance with training and best practice guidelines.
- PPE including Hi-Viz vests, safety shoes, to be worn. Dust masks and safety glasses/goggles to be worn for specified operations e.g. grinding, etc. as required.
- Appropriate ventilation available when carrying out activities e.g. doors open, extractors used.
- Activities involving flammable liquids e.g. refuelling, to be carried out away from any sources of ignition.
- No smoking except in the designated smoking area. This includes electronic cigarettes.
- No fires on-site.
- Dampening down of areas susceptible to dust creation, particularly during dry conditions.
- Checks undertaken to identify large concentrations of vapours in the air e.g. sniff test to check for petrol/diesel fumes etc.



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PR6 Emergency Incidence Procedure – Discovery of suspicious items

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PR6 - Emergency Incident Procedure – Discovery of Suspicious Items

The safety policy will be adhered to at all times and the following particular procedure will be the subject of training in order to ensure that all employees are aware of its contents and practised in its implementation.

In the event of a suspicious item being discovered on site, the following procedures will be adopted.

- Senior Manager on site to be notified immediately.
- Location cleared of all personnel.
- Emergency services notified.
- Natural Resources Wales notified.
- Site to remain under the control of the senior emergency officer until the emergency/incident is over.
- Report of the incident prepared by the senior manager and a CAR raised (Form FR10).

To minimise the likelihood of suspicious items being delivered on site the following will be undertaken:

- Waste transfer and delivery notes detailing type of material/s and source to accompany every delivery on site.
- Thorough inspection of deliveries and any suspicious items immediately rejected.
- Daily walk around of site undertaken to identify suspicious items.
- Staff suitably trained in the identification of suspicious items.



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PR7 Waste Acceptance Procedure

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PR7 – Waste Acceptance Procedure

Site operators must ensure compliance with the Environmental Permit at all times.

All waste, as allowed under the terms of the site's Environmental Permit and the conditions of the planning consent, enters the facility via the secure main access gates as shown on the site layout plan (Drawing 10934-000-C).

The acceptance criteria for incoming waste is that it must be within the list of permitted materials listed in section 2.1 of the site's environmental permit and be free of significant contamination.

All waste carrying vehicles entering the facility via the site main entrance are directed to the Reception/Unloading area. The driver is required to attend at the site office where all waste transfer notes are inspected by the Site Supervisor or Manager and the information is recorded.

The Site Manager (or Senior Manager on-site) then carries out visual checks on the waste to confirm that it is described adequately, conforms to any pre-acceptance checks and that the waste is permitted for acceptance at the site.

A schedule of permitted wastes is clearly displayed at the office for ease of reference by the designated member of staff who is trained and proficient in the role undertaken. In addition, further support, if needed, is provided by our on-site Technically Competent Person.

Each load is inspected to ensure it complies with waste acceptance criteria.

All responsible staff undertake waste awareness training to ensure they are proficient in identifying waste types and in recording the necessary information under the duty of care provisions and other requirements as described in the Environmental Permit.

In the event of any delay in the examination of the waste consignment documentation or doubt in respect of the consignment, the vehicle is directed to a holding area until the proficient person is satisfied that the documents are in order and the waste conforms with the terms of site permit.

Vehicles are unloaded and loads inspected again before being placed in the storage area. Following inspection, either:

- Wastes are acceptable, the company takes responsibility for the duty of care of the waste, and the driver is issued with a conveyance note confirming receipt of the waste; or
- If the site manager finds any irregularities with the waste after deposit then the waste will be either re-loaded back into the vehicle and rejected from the site, or will be quarantined within a secure quarantine area pending further enquiries and agreement with or instructions received from Natural Resources Wales (as required). The Best Practicable Environmental Option for recovery/disposal of the non-conforming material will be used. Arrangements for the offsite transfer/disposal of non-conforming wastes will be made as soon as arrangements can be finalised taking due account of their potential to cause environmental impact/nuisance e.g. odour etc.

Remedial measures (via a CAR Form FR10) will be taken in order to reduce the potential for recurrence via site records/documentation being passed to the waste producer/carrier/disposer as determined after investigation by site management.

Any minor leaks or spills during unloading are handled in accordance with the site Spill Procedure (Procedure PR3).

All waste movements will conform with the requirements of the Environmental Permitting Regulations.



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PR8 Procedure for Assessment and Implementation of Training Needs, Competence and Awareness

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PR8 - Procedure for Assessment and Implementation of Training Needs, Competence and Awareness

1. Methodology

Each person (employee, temporary or contract staff) performing tasks for or on behalf of the company, who could have a significant impact on the environment, will be assessed for their suitability, competence (training or on the job experience) and environmental awareness (e.g. in relation to company policies and procedures, and in relation to prevention of pollution).

The responsibility for this assessment lies with the Site Manager.

If there appear to be deficiencies, the responsible person will arrange the relevant training/mentoring at the earliest possible time. The responsible person should ensure that there is no risk to the environment, or any health and safety risk to employees or the public during the interim period prior to training.

2. Provision of training

Any training provided should be by a competent person or body, as defined by knowledge, qualifications or experience. The competency of the training person or body should be assessed by the responsible person as defined above.

3. Verification of training effectiveness

The verification of the effectiveness of training and awareness will be performed during the internal audit process of operational activities, or at a separate inspection if deemed necessary (i.e. for a new employee). Any random checks or inspections of employee awareness should be noted in the site/office diary, together with the names and dates of relevant participants, and any corrective actions taken if required.

4. Training Records

Copies of all relevant training certificates will be held on site. In addition, the responsible person defined above will ensure that the Training Checklist (Form FR6) and Training Records (Form FR7) which define needs, status of training etc. are updated and readily available for inspection.



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PR9 Maintenance Procedure

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PR9 – Maintenance Procedure

1. Methodology

The integrity of the sites' infrastructure shall be inspected daily by an appropriate member of staff and any issues or concerns will be recorded in the site diary.

A Maintenance Checklist (Form FR4) identifying items of plant, location of maintenance instructions and responsibilities will be kept and maintained.

A separate Maintenance Record (Form FR5) will be kept for each item of plant identified in the Maintenance Checklist. Maintenance undertaken on any plant will be recorded in the relevant Maintenance Record.

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PR10 Procedure for Recording of Staff Responsibilities

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PR10 – Procedure for Recording of Staff Responsibilities

A record of staff roles and responsibilities will be maintained (Form FR8) clearly defining roles and responsibilities (e.g. technically competent person). This document will state who is in charge of ensuring compliance with each part of the permit and other relevant legislation and guidance. This document will be kept and updated at least every 12 months, or if staff change roles or leave the organisation.

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PR11 Procedure for Recording and Reporting of Environmental Incidents

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PR11 – Procedure for Recording and Reporting of Environmental Incidents

All employees are responsible for reporting environmental incidents to the Site Manager (or Senior Manager on site). Where procedures or Permit Conditions require additional, specific records to be maintained, a written incident report must be provided to the Site Manager on the Accident and Incident Report template (Form FR9) as soon as possible after the verbal report has been made.

Where an incident is serious, Natural Resources Wales must be informed immediately by telephone or other agreed mechanism. A serious incident would include:

- Actual or imminent risk of significant environmental pollution.
- Breach of statutory limits or Site Licence Conditions.
- Any incident that must be reported to the enforcing authorities.
- Deposit of significant amounts of a non-permitted waste in skips or directly at the site.
- Any incident that could foreseeably lead to serious public complaint or media enquiries.
- Major damage to plant, equipment, premises including fires on-site.
- Serious injury of the public.
- Serious near-misses which could have foreseeably lead to any of the above.

A central file containing all Incident Reports will be maintained and will be reviewed at regular intervals to identify whether any trends or patterns can be discerned.

Where an incident is required to be reported to the enforcing authorities, the Site Manager must ensure that this report has been made within the required time period and in the specified format.



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PR12 Complaints Procedure

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PR12 – Complaints Procedure

On receipt of a customer complaint, the recipient shall enter pertinent details onto a Complaint Record (Form FR2). The Site Manager should be informed immediately and will be responsible for determining measures to be taken to address any issues.

The Site Manager in discussion with other personnel shall establish the responsibility for actioning the complaint. The nominated person will be responsible for communications with the customer to resolve the situation, including action by, and completion date.

If complaints are recent/current, a site inspection (and for odour sniff test) will be conducted by the nominated person in the area from which the complaint is received in order to assess the presence/absence of any ongoing issue. Where possible the likely cause of the complaint will be confirmed.

Emergency procedures within the Environmental Management System Plan or relevant procedure shall be initiated immediately if a verified event is in progress and that it is determined to be arising as a result of the company's operations.

For all complaints, reference will be made to the site activities at the time of the complaint and further onsite investigations conducted to determine whether any abnormal operations are/were occurring. Data from any onsite weather station from the time of the complaint will be logged.

Remedial actions to prevent a recurrence of the incident shall be determined by the nominated person in agreement with the Site Manager and if necessary, a Corrective Action Request (Form FR10) raised, copies of which shall be distributed as necessary for information purposes.

Feedback will be given to complainants on the findings of these investigations if they are known, and a summary will be provided of any remedial measures taken to rectify problems and ensure that the problem has been suitably resolved. The complainant will be asked if the perceived problem is still occurring to measure any improvement achieved. In the event that a significant verified event has occurred, an apology will be issued as appropriate and a commitment given to try and prevent further occurrences.

Within 28 days of the complaint a short factual report should be submitted to Natural Resources Wales by the Site Manager or Designated Senior Manager, detailing the complaint(s) received, the investigations conducted, the findings of those investigations, whether the complaint was substantiated, any remedial measures implemented and any ongoing improvement actions to be implemented.

All stages of the progression of the complaint will be recorded. All complaints will be filed in a Customer Complaint Log held by the Site Manager.

On completion of the remedial action, the CCF, together with copies of any associated correspondence shall be forwarded to the Company Secretary for filing purposes. Records of all complaints, subsequent investigations, and remedial actions will be kept for at least five years. The Company Secretary shall ensure they are readily retrievable, and maintained as fit for retention. As applicable, records will be stored in accordance with the Data Protection Act 1998.

Customer complaints will be reviewed at the scheduled management review meetings. Complaint trend analysis will be conducted to identify any trends and patterns in complaints to assist in identification of possible causes and solutions.



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FR1 Site Inspection Record

FR2 Complaint Record

FR3 Plant and Equipment Inventory

FR4 Maintenance, Service, Calibration Schedule

FR5 Maintenance Record

FR6 Training Checklist (Employee Competency Matrix)

FR7 Training Record

FR8 Roles and Responsibilities

FR9 Environmental Accident (and Incident) Record

FR10 Corrective Action Request

FR11 Register of Waste Facilities

FR12 Register of Legal and Other Requirements



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FR1 Site Inspection Record

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FR1 Site Inspection Record

Date	
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Inspection 1		
Time		
Checklist	Signature	CAR Raised
Drainage		
Litter		
Security (Boundary and Gates)		
Unauthorised Waste Containers		
Dust		
Mud and Debris		
Sand Bag Stock		
Reinforced Concrete Floors and Walls		
Waste Storage Tanks		
Odour Monitoring		
Comments/Observations		

Inspection 2		
Time		
Checklist	Signature	CAR Raised
Drainage		
Litter		
Security (Boundary and Gates)		
Unauthorised Waste Containers		
Dust		
Mud and Debris		
Sand Bag Stock		
Reinforced Concrete Floors and Walls		
Waste Storage Tanks		
Odour Monitoring		
Comments/Observations		



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Evening checks		
Time		
Checklist	Signature	CAR Raised
Site housekeeping		
Skips containing lightweight materials covered		
Work equipment collected & stored		
Buildings secured and locked		
Paperwork completed and CAR's raised		
Skips stored on hard standing		
Site Secured		
Comments/Observations		

Weekly checks (Mondays Only)		
Time		
Checklist	Signature	CAR Raised
Sealed Drainage Tanks (inc. level check)		
Site Drainage (lift inspection covers)		
Dust Suppression Equipment		
Comments/Observations		

Note: At the end of each day, please return completed forms to the main office, together with details of any CAR's to be raised.



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FR2 Complaint Record

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FR2 Complaint Record

Who made the complaint?

Name:	
Address	
Phone No.	
Date and time they made the complaint	

Details

What happened, what was it about?	
Was anyone else aware of this – other neighbours or staff? If so who?	
Did the complaint relate to the site? If so, what happened? What went wrong?	
What have you done to make sure that it does not happen again?	
Was there any significant pollution or environmental damage to land, water or protected areas – for example: dust, odour or noise pollution outside the site or spillage of polluting liquids onto the ground, or at a site of special scientific interest, or into a drain or a watercourse? (If so, then complete an incident form in Section 6)	
If there was, then you must take steps to prevent further damage and notify Natural Resources Wales on 0800 807060 and any other relevant regulators ASAP. Have you done so? Yes / No	Who did you phone? At what time did you phone?
You must also write or send an email to confirm this to the local office (see your accident management plan for the address) Have you done so?	Yes/No What date did you contact?
Please print your name and sign:	

Continue overleaf or on a separate sheet if you do not have enough room. Keep the completed form in the file to discuss with Natural Resources Wales when they visit.



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3. FR3 Plant and Equipment Inventory

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FR4 Maintenance, Service, Calibration Schedule

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FR4 Maintenance, Service, Calibration Schedule

Quantity	Description	Servicing Frequency	Records Kept	Responsibility
<u>Vehicles</u>				
<u>1</u>	<u>Volvo YN08</u>	6 week cycle	<u>Weighbridge Office</u>	<u>E Phillips</u>
<u>1</u>	<u>GN58</u>	6 week cycle	<u>Weighbridge Office</u>	<u>E Phillips</u>
<u>1</u>	<u>Fire Engine</u>	<u>Per Manufacturer's Instructions</u>	<u>Weighbridge Office</u>	<u>E Phillips</u>
<u>Trailers/Containers</u>				
<u>3</u>	<u>Trailer</u>	6 week cycle	<u>Weighbridge Office</u>	<u>E Phillips</u>
<u>1</u>	<u>Tipping Trailer</u>	6 week cycle	<u>Weighbridge Office</u>	<u>E Phillips</u>
<u>1</u>	<u>Steel Storage</u>	6 week cycle	<u>Weighbridge Office</u>	<u>E Phillips</u>
<u>Plant and Infrastructure</u>				
<u>2</u>	<u>Weighbridge</u>	<u>Calibrated Annually</u>	<u>Weighbridge Office</u>	<u>E Phillips</u>
<u>2</u>	<u>Shears</u>	<u>Annually</u>	<u>Weighbridge Office</u>	<u>E Phillips</u>
<u>1</u>	<u>Shears (NF Processing Building)</u>	<u>Annually</u>	<u>Weighbridge Office</u>	<u>E Phillips</u>
	<u>Pressure Washer</u>	<u>Annually</u>	<u>Weighbridge Office</u>	<u>E Phillips</u>
<u>1</u>	<u>Atlas 350</u>	3 month cycle	<u>Weighbridge Office</u>	<u>E Phillips</u>
<u>1</u>	<u>Atlas TM350</u>	3 month cycle	<u>Weighbridge Office</u>	<u>E Phillips</u>
<u>1</u>	<u>Fuchs 350</u>	3 month cycle	<u>Weighbridge Office</u>	<u>E Phillips</u>
<u>1</u>	<u>Fuchs 359 MHL</u>	3 month cycle	<u>Weighbridge Office</u>	<u>E Phillips</u>
<u>1</u>	<u>Fuchs Magnet</u>	<u>Per Manufacturer's Instructions</u>	<u>Weighbridge Office</u>	<u>E Phillips</u>
<u>1</u>	<u>Baler and Generator</u>	<u>Annually</u>	<u>Weighbridge Office</u>	<u>E Phillips</u>
<u>1</u>	<u>Cable stripper</u>	<u>Per Manufacturer's Instructions</u>	<u>Weighbridge Office</u>	<u>E Phillips</u>
<u>1</u>	<u>Tilter</u>	<u>Per Manufacturer's Instructions</u>	<u>Weighbridge Office</u>	<u>E Phillips</u>
<u>1</u>	<u>Grab</u>	<u>Per Manufacturer's Instructions</u>	<u>Weighbridge Office</u>	<u>E Phillips</u>
<u>Various</u>	<u>Site Drainage</u>	<u>Weekly inspection</u>	<u>Weighbridge Office</u>	<u>Site Manager</u>
<u>Health and Safety Equipment</u>				
	<u>Smoke Alarms</u>	<u>Monthly as part of site inspection</u>	<u>Weighbridge Office</u>	<u>Site Manager</u>
	<u>Electrical Inspection of all equipment</u>	<u>Annually</u>	<u>Weighbridge Office</u>	<u>Site Manager</u>
	<u>Fire Extinguishers</u>	<u>Annually</u>	<u>Weighbridge Office</u>	<u>Site Manager</u>



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FR5 Maintenance Record

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FR6 Training Checklist

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FR6 Training Checklist (Employee Competency Matrix)

Updated:
20/02/16

	Name	Job Title	Department
Management	Richard Phillips	Managing Director	Office
	Adrian Stewart	Director	Office
	Darren Stillman	Yard Manager	Office
	C. Phillips	Finance Controller	Office

[illegible][illegible][illegible][illegible][illegible][illegible]

Operatives	D. Kuc	Cutter	Yard
	S. Kuc	Cutter	Yard
	M. Lacey	Cutter/Plant Operator	Yard
	L. Stillman	Plant Operator	Yard
	R. Lewis	Plant Operator	Yard
	C. Skelding	Plant Operator	Yard
	E. Phillips	Weighbridge Operator	Yard

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Key: Grey – Not Required Green – Achieved (Training or experience/competency) Amber – Desirable Red – Urgent Requirement Blue – In Progress



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FR7 Training Record

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FR7 Training Record

Employee Name	Job Title

Training Required	Date due	Date done	Passed as competent? yes/no	Reviewers Signature	Date for Refresher	Comments



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FR8 Staff Roles and Responsibilities

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FR8 Staff Roles and Responsibilities

Name	Role	Part of permit responsible for	Any other legislative responsibilities?	Required training received?
Richard Phillips	Managing Director	Business Operations	HR, H&S	Yes
Adrian Stewart	Director (TCM)	Permit Compliance		Yes
Darren Stillman	Yard Manager	Site Operations		Yes
Ellis Phillips	Weighbridge Operator	Acceptance of waste		Yes
C. Phillips	Finance Controller	Payments		Yes



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FR9 Environmental Accident (and Incident) Record

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FR9 Environmental Accident (and Incident) Record

Details

Date and time of the incident

What happened, what was it about?

Was anyone else aware of this – other witnesses? If so who?

What caused it?

What have you done to make sure that it does not happen again?

Was there any **significant pollution** or **environmental damage** to land, water or protected areas – for example: dust, odour or noise pollution outside the site or spillage of polluting liquids onto the ground, or at a site of special scientific interest, or into a drain or a watercourse? If so what?

Is there a continuing threat? Yes / No

If there was (or still is), then you must take steps to prevent further damage and notify Natural Resources Wales on 0800 807060 and any other relevant regulators ASAP.

Have you done so? Yes / No

You must also write or send an email to confirm this to the local office (see your accident management plan for the address) Have you done so?

Please print your name and sign:

Who did you phone?

At what time did you phone?

Yes/No

What date did you contact?

Continue overleaf or on a separate sheet if you do not have enough room.

Keep the completed form in the file to discuss with Natural Resources Wales when they visit.



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FR10 Corrective Action Request

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FR10 Corrective Action Request

Corrective Action Request No.			
Date CAR raised			
Response to e.g. audit, observation, complaint, improvement suggestion, near miss, accident, non-conforming product etc.			
Person(s) Responsible for CAR			
CAR Origin e.g. Area number (1-office, 2- Non-ferrous Processing Building, 3- yard, 4-external)			
Details of Non-Conformance			
Root cause analysis			
Action(s) to be taken	Person Responsible	Timescale	Completed
Preventive Measures taken to avoid recurrence and controls applied to ensure effectiveness			
Procedures Modified? (If Yes, Reference No.)			
Action Complete (Signed):		Follow-Up Date:	
		Close-Out Date:	



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FR11 Register of Waste Outlets

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Recovery/Disposal Site	Site Licence Location	Waste Accepted	Site Licence	Comments
Celsa Manufacturing UK Ltd (Cardiff)	Weighbridge Office	Ferrous	TP3639BH	
Tata Steel UK Ltd (Port Talbot)	Weighbridge Office	Ferrous	BV7311IE	
EMR (Gloucester)	Weighbridge Office	Non-Ferrous	GP3298CA	
Environmental Practical Solutions Ltd	Weighbridge Office	Various	VB3097TV	

New Sites

Recovery/Disposal Site	Site Licence Location	Waste Accepted	Site Licence	Expiry Date



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FR12 Register of Legal and Other Requirements

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AIR

Legislation	Summary	Compliant
(1) Clean Air Act 1993	<p>The main aim of this Act is to provide a comprehensive control mechanism to protect the environment from smoke, dust and fumes. Emissions of dark smoke are prohibited from chimneys and industrial or trade premises, with certain exemptions for specific times of the day and for how long the smoke is emitted. The smoke itself is assessed by the Ringelmann Chart.</p> <p>The Secretary of State can set emission limits for grit, dust and fumes from chimneys, furnaces and boilers. Such limits are based on the various heat inputs and outputs of the installation in question. Local authorities can declare an area to be a smoke control area, thereby prohibiting the emission of smoke in that area, unless an authorised fuel or exempt fireplace is used. In order to limit or reduce air pollution, specific regulations have been produced under this Act with regard to motor fuel, and the sulphur content of oil fuel.</p>	<p>As evidenced by:</p> <ul style="list-style-type: none"> - Observations – e.g. workplace inspections, daily attendance - Incidents – e.g. zero complaints
(2) Environment Act 1995	<p>The aim of the Act relates to a wide range of environmental issues, from the establishment of the Environment Agency and SEPA, to provisions for contaminated land and abandoned mines, National Parks, the control of pollution, conservation of the environment, obligations relating to products and materials, and fisheries.</p> <p>Part 2 amends the following legislation:</p> <ul style="list-style-type: none"> ◦Environmental Protection Act 1990, by inserting Part 2A on contaminated land, which places a responsibility on local authorities to identify contaminated land in their area; ◦Water Resources Act 1991, by inserting Chapter 2A into Part 3 on control of pollution of water resources, to provide new provisions for abandoned mines in England and Wales; ◦Control of Pollution Act 1974, by inserting Part 2A to provide similar provisions for abandoned mines in Scotland. 	<p>As evidenced by:</p> <ul style="list-style-type: none"> - Observations – e.g. workplace inspections - Incidents – e.g. zero complaints - Documentation – e.g. Environment Agency exemption
(3) Environmental Protection Act 1990	<p>The aim of the Act is to provide a framework, which will enable the Secretary of State to enforce regulations in order to prevent pollution from emissions to air, land or water from various processes. Crucially, it contains the main legislation relating to statutory nuisances, introduces the concept of integrated pollution control and also places a duty of care on those involved in the management of waste.</p> <p>Part 1 outlines the controls on certain industrial processes and requires that they are authorised under either an Integrated Pollution Control or Atmospheric Pollution Control regime, according to their potential impact on the environment. This Part of the Act is due to be revoked and replaced by the Pollution Prevention and Control Act 1999.</p> <p>Part 2 outlines the basic provisions for the management of all waste, which includes details on:</p> <ul style="list-style-type: none"> ◦definition of waste; ◦duty of care requirements; ◦waste management licences. <p>Provisions are also established for waste reduction schemes.</p> <p>Part 2A deals with the identification and remediation of land where contamination poses an unacceptable risk to human health or the environment. It differentiates between contaminated land and special sites. It also determines liability with regard to the remediation, as well as the information to be held on a public register.</p> <p>Part 3 determines what constitutes a statutory nuisance and what action can be taken to abate it.</p> <p>Part 4 sets out the basic provisions for the prevention of littering, and specifically deals with the control of litter and also abandoned shopping and luggage trolleys.</p> <p>Part 8 makes provision for controls on dangerous substances, contaminated land and a variety of other diverse environmental concerns. It also deals with public registers of land which may be classified as contaminated, pollution at sea, control of dogs and straw and stubble burning.</p>	<p>As evidenced by:</p> <ul style="list-style-type: none"> - Observations – e.g. workplace inspections, management systems audit - Incidents – e.g. zero complaints; zero environment agency enforcements - Documentation – e.g. Environment Agency exemption, Waste Carriers Licence, Duty of Care Documentation and Consignment Notes
(4) Environmental Protection (Controls on Ozone-Depleting Substances)	<p>These Regulations came into force on 20 July 2011 and apply to England, Scotland and Wales. They also apply to Northern Ireland, but only with regard to import and export.</p> <p>They revoke and replace the Environmental Protection (Controls on Ozone-Depleting Substances) Regulations SI 2002/528 and enforce the provisions of Regulation (EC) 1005/2009, on substances that deplete the ozone layer, which controls the production, import, export, placing on the market, recovery, recycling, reclamation and destruction of such substances.</p> <p>These Regulations establish the enforcement network which is required to give full effect to Regulation (EC) 1005/2009, which includes setting out details on offences.</p>	<p>As evidenced by:</p> <ul style="list-style-type: none"> - Observations – e.g. visual inspection of fridge - Incidents – e.g. zero complaints



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Regulations SI 2011/1543

Regulation (EC) 1005/2009 promotes the recovery, reclamation and destruction of controlled substances, and assigns this responsibility to users, refrigeration technicians and other appropriate bodies. The recovery of controlled substances from refrigeration, air-conditioning and heat pump equipment must be carried out for either:

- approved destruction, or destruction by other environmentally acceptable means;
- recycling or reclamation during servicing or maintenance, or before it is dismantled or disposed of, and must be done by personnel who have certain minimum qualifications.

The Ozone-Depleting Substances (Qualifications) Regulations SI 2009/216 set these minimum qualifications, so their holders can work with ozone depleting substances. They are amended by these Regulations, so the maintenance of fire protection systems and fire extinguishers are added to the tasks which require the person carrying them out to have minimum qualifications.

WASTE

Legislation	Summary	Compliant
(5) Control of Pollution Act 1974	<p>The aim of the Act is to deal with a variety of environmental issues, including waste on land, water pollution, abandoned mines, noise pollution and the prevention of atmospheric pollution.</p> <p>Much of Part 1 of the Act on waste has been revoked by Part 2 of the Environmental Protection Act 1990, but some provisions remain in force with regard to:</p> <ul style="list-style-type: none"> ◦ licensing of disposal of controlled waste; ◦ collection and disposal of controlled waste; ◦ waste other than controlled waste; ◦ reclamation of waste; ◦ street cleaning and litter. <p>Although much of Part 3 on noise has now been revoked, it still contains provisions relating to noise and nuisance.</p>	<p>As evidenced by:</p> <ul style="list-style-type: none"> - Observations – e.g. management systems audit - Incidents – e.g. zero complaints; zero environment agency enforcements <p>Documentation – e.g. Waste Carriers Licence</p>
(6) The Controlled Waste (England and Wales) Regulations 2012	<p>They came into force on 6 April 2012. They revoke and replace the Controlled Waste Regulations 1992.</p> <p>The Regulations classify waste as household, industrial or commercial waste. They enable local authorities in Wales to charge for the collection and disposal of waste from non-domestic properties. There are some exemptions including:</p> <ul style="list-style-type: none"> • charity shops selling donated goods and “re-use” organisations as the waste has come from homes; and • village halls and premises used for public meetings. <p>The Regulations consolidate previous amendments, and include some amended and updated definitions and classifications to improve the clarity of the Regulations and bring them into line with other recent legislation.</p>	<p>As evidenced by:</p> <ul style="list-style-type: none"> - Observations – e.g. management systems audit, Flow Processes - Incidents – e.g. zero complaints; zero environment agency enforcements <p>Documentation – e.g. Duty of care tickets, Service Agreements, Waste Carriers Licence</p>
(7) The Environmental Permitting (England and Wales) (Amendment) (No.2) Regulations SI 2013/766	<p>The aim of the Regulations is to widen the existing environmental permitting system by integrating regimes covering water discharge consents, groundwater authorisations and radioactive substances. It also includes provisions relating to mining waste and batteries.</p> <p>This environmental permitting system already covers the regimes previously established for waste management licensing, pollution prevention and control, landfill, waste incineration and the operation of large combustion plants.</p> <p>Environmental permits are required for industrial and waste activities which could harm human health or the environment unless they are controlled. They apply to installations, waste operations and mobile plants, and their resulting activities are classed as either Part A(1), Part A(2) or Part B. Schedule 1 sets out the activities which need to be controlled.</p> <p>Where an activity falls under these Regulations, the operator must either obtain a permit or register an exempt operation. Such operations meet the requirements of Schedule 2 and fall within a description of the operations set out in Schedule 3.</p>	<p>As evidenced by:</p> <ul style="list-style-type: none"> - Observations – e.g. site inspections, management systems audit, Flow Processes - Incidents – e.g. zero complaints; zero environment agency enforcements <p>Documentation – e.g. Duty of care tickets, Waste Carriers Licence, Site Exemption, Hazardous Waste Premises Code.</p>



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	<p>All applications for an environmental permit must be made by the operator of a regulated facility to the regulator, who will decide whether to grant authorisation. A single site permit can be issued which authorises multiple sites under the same permit.</p> <p>Standard rules can be prepared for lower risk waste activities. These are a fixed package of rules to which the operator must adhere. If at any time there is a change in the way a site operates so it falls outside of a standard rules permit, a bespoke environmental permit must be applied for which relates specifically to the facility in question.</p> <p>Updated regulations have now been published and amend the Environmental Permitting (England and Wales) Regulations SI 2010/675 implementing the Industrial Emissions Directive (IED) 2010/75/EU. The following Regulations are now revoked the Clean Air Enactments (Repeals and Modifications) Regulations 1974, the Control of Industrial Air Pollution (Transfer of Powers of Enforcement) Regulations 1987 and the Control of Asbestos in the Air Regulations 1990. Specific sections of the Landfill Directive, the Environmental Permitting (England and Wales) Regulations 2010 and the Control of Major Accident Hazards Regulations 1999 to make provision for the storage of metallic mercury waste.</p>	
(8) Hazardous Waste (England and Wales) Regulations SI 2005/894	<p>The aim of the Regulations is to set out a new regime to control and track the movement of hazardous waste in England. They work in conjunction with the List of Wastes (England) Regulations SI 2005/895, which reproduce the list of wastes from Decision 2000/532/EC, which contains the current version of the European Waste Catalogue.</p> <p>The Environment Agency must be notified of all premises where hazardous waste is produced or removed, unless the premises in question are exempt. A consignment note must be completed where hazardous waste is removed from any premises. There is also a schedule of carriers for when more than one carrier transports the consignment and separate provisions for multiple collections.</p> <p>The List of Wastes (England) Regulations SI 2005/895 outlines the different categories of waste which are classified by two-digit and four-digit chapter headings. Each waste under these respective headings is assigned its own specific six-digit code and any waste marked with an asterisk is considered to be hazardous. This six-digit code must be quoted on the consignment note.</p> <p>Records must be kept of: 'all tipped hazardous waste; 'the disposal or recovery of hazardous waste by other means; 'all producers', holders', consignors' and carriers' of hazardous waste.</p>	<p>As evidenced by:</p> <ul style="list-style-type: none"> - Observations – e.g. site inspections, management systems audit, Flow Processes - Incidents – e.g. zero complaints; zero environment agency enforcements <p>Documentation – e.g. Duty of care tickets, Waste Carriers Licence, Site Exemption, Hazardous Waste Premises Code, Consignment Notes.</p>
(9) Hazardous Waste (Wales) Regulations SI 2005/1806	<p>The aim of the Regulations is to set out a new regime to control and track the movement of hazardous waste in Wales. They work in conjunction with the List of Wastes (Wales) Regulations SI 2005/1820, which reproduce the list of wastes from Decision 2000/532/EC, which contains the current version of the European Waste Catalogue.</p> <p>The Environment Agency must be notified of all premises where hazardous waste is produced or removed, unless the premises in question are exempt. A consignment note must be completed where hazardous waste is removed from any premises. There is also a schedule of carriers for when more than one carrier transports the consignment and separate provisions for multiple collections. However, the multiple collection procedure can only be used until 28 September 2011.</p> <p>The List of Wastes (Wales) Regulations SI 2005/1820 outlines the different categories of waste which are classified by two-digit and four-digit chapter headings. Each waste under these respective headings is assigned its own specific six-digit code and any waste marked with an asterisk is considered to be hazardous. This six-digit code must be quoted on the consignment note.</p> <p>Records must be kept of: 'all tipped hazardous waste;</p>	<p>As evidenced by:</p> <ul style="list-style-type: none"> - Observations – e.g. management systems audit, Flow Processes - Incidents – e.g. zero complaints; zero environment agency enforcements <p>Documentation – e.g. Duty of care tickets, Waste Carriers Licence, Hazardous Waste Premises Code, Consignment Note.</p>



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	<p>the disposal or recovery of hazardous waste by other means;</p> <p>all producers, holders, consignors, brokers and carriers of, and dealers in, hazardous waste.</p>	
<p>(10) List of Wastes (England) Regulations SI 2005/895</p>	<p>The aim of the Regulations is to identify and classify wastes. The list of wastes set out in Schedule 1 to the Regulations is a reproduction of the list of wastes from Decision 2000/532/EC, which contains the current version of the European Waste Catalogue.</p> <p>The different categories of waste are classified by two-digit and four-digit chapter headings, and each waste under these respective headings is assigned its own specific six-digit code. Any waste marked with an asterisk is considered to be hazardous for the purpose of the Hazardous Waste (England and Wales) Regulations SI 2005/894.</p>	<p>As evidenced by:</p> <ul style="list-style-type: none"> Observations – e.g. management systems audit Incidents – e.g. zero complaints; zero environment agency enforcements Documentation – e.g. Duty of care tickets, Waste Carriers Licence, Consignment Note, EWC Code Book.
<p>(11) List of Wastes (Wales) Regulations SI 2005/1820</p>	<p>The aim of the Regulations is to identify and classify wastes. The list of wastes set out in Schedule 1 to the Regulations is a reproduction of the list of wastes from Decision 2000/532/EC, which contains the current version of the European Waste Catalogue.</p> <p>The different categories of waste are classified by two-digit and four-digit chapter headings, and each waste under these respective headings is assigned its own specific six-digit code. Any waste marked with an asterisk is considered to be hazardous for the purpose of the Hazardous Waste (Wales) Regulations SI 2005/1806.</p>	<p>As evidenced by:</p> <ul style="list-style-type: none"> Observations – e.g. management systems audit Incidents – e.g. zero complaints; zero environment agency enforcements Documentation – e.g. Duty of care tickets, Waste Carriers Licence, Consignment Note, EWC Code Book, SIC Code.
<p>(12) Producer Responsibility Obligations (Packaging Waste) Regulations SI 2007/871</p>	<p>The aim of the Regulations is to make sure that the UK Government meets its recovery and recycling targets for packaging waste. The UK is unique to the rest of Europe as they place the responsibility for this recovery and recycling on the producers of the waste. The provisions affect companies who have an annual turnover of more than £2 million and handle packaging or packaging materials weighing more than 50 tonnes each year.</p> <p>Where a producer meets the requirements of the Regulations, they must register with the Environment Agency or SEPA. They then have an obligation to recover and recycle packaging waste and to provide a certificate of obligation.</p> <p>If a producer wants to satisfy their producer responsibility obligations themselves they can purchase packaging waste recovery notes (PRNs) and/or packaging waste export recovery notes (PERNs), which are essentially evidence these obligations have been carried out. Only accredited reprocessors can issue PRNs and/or PERNs.</p> <p>However, producers can become a member of a registered scheme, where they are exempt from having to comply with their obligations directly. This is only for the year the producer is registered and on the provision that the compliance scheme meets the producer responsibility obligations.</p>	<p>As evidenced by:</p> <ul style="list-style-type: none"> Observations – e.g. management systems audit Incidents – e.g. zero complaints; zero environment agency enforcements Disposal Site Licences Documentation – e.g. Duty of care tickets, Waste Carriers Licence, Consignment Note, EWC Code Book, SIC Code.
<p>(13) Waste (England and Wales) Regulations SI 2011/988</p>	<p>The Regulations implement Directive 2008/98/EC, on waste, by replacing waste regulation relating to the registration of waste carriers, the transfer of waste and the waste strategy. They also introduce new provisions which put greater emphasis on the life-cycle of waste.</p> <p>There are also a duty imposed on businesses to apply the waste hierarchy when transferring waste, and from 1 January 2015, to collect waste paper, metal, plastic and glass separately and not to mix them once separately collected.</p> <p>Carriers and brokers of, and dealers in, controlled waste must be registered with the Environment Agency, unless they are exempt, and failing to do so is an offence. Provisions also specify what should be included in a transfer note and how long it should be kept.</p>	<p>As evidenced by:</p> <ul style="list-style-type: none"> Observations – e.g. management systems audit Incidents – e.g. zero complaints; zero environment agency enforcements Disposal Site Licences Documentation – e.g. Duty of care tickets, Waste Carriers Licence,



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		Consignment Note, EWC Code Book, SIC Code.
(14) Waste (England and Wales) (Amendment) Regulations 2014	<p>The new Regulations amend the Waste (England and Wales) Regulations 2011 which implement the requirements of the Revised EU Waste Framework Directive; a fundamental piece of waste legislation that sets requirements for the collection, transport, recovery and disposal of waste throughout the EU.</p> <p>The majority of the recent amendments are related to waste offences and impact other legislation, however they also introduce some important changes to the requirements for Waste Transfer Notes.</p> <p>Waste Transfer Notes have historically been used by the waste regulators, such as the Environment Agency, to track and ensure the safe and legal movement of non-hazardous waste throughout the waste management chain. Previous legislation has stipulated that a correctly completed Waste Transfer Note must cover every transfer of non-hazardous waste from a producer's site.</p> <p>The Waste (England and Wales) Regulations 2014 effectively remove the legal requirements for a Waste Transfer Note to be in place for each movement of waste and instead allow the use of 'Written Information' to cover the transfer of waste. Such 'Written Information' must still meet strict requirements and include certain information (as laid down in Regulation 35 of the 2011 Regulations), but this change in legislation seems to open the door for the replacement of Waste Transfer Notes with other documents, such as invoices or collection receipts.</p>	<p>As evidenced by:</p> <ul style="list-style-type: none"> - Observations – e.g. management systems audit - Incidents – e.g. zero complaints; zero environment agency enforcements - Disposal Site Licences <p>Documentation – e.g. Duty of care tickets, Waste Carriers Licence, Consignment Note, EWC Code Book, SIC Code.</p>
(15) The Waste (Miscellaneous Provisions) (Wales) Regulations 2011	<p>Waste (Miscellaneous Provisions) (Wales) Regulations 2011 came into force on 29 March 2011.</p> <p>These regulations bring the revised Waste Framework Directive into law in Wales. They make changes to other Welsh regulations and revoke the Environmental Protection (Duty of Care) (Amendment) (Wales) Regulations 2003.</p> <p>The Waste (Miscellaneous Provisions) (Wales) Regulations 2011 makes changes to existing regulations bilingually. This was needed because the originals were bilingual.</p> <p>The Waste (Miscellaneous Provisions) (Wales) Regulations 2011:</p> <ul style="list-style-type: none"> • Paragraph 11 of Schedule – Hazardous waste consignment notes. The multiple collection procedure and the existing consignment note forms may continue to be used up to and including 27 September 2011. 	<p>As evidenced by:</p> <ul style="list-style-type: none"> - Observations – e.g. management systems audit - Incidents – e.g. zero complaints; zero environment agency enforcements - Disposal Site Licences <p>Documentation – e.g. Duty of care tickets, Waste Carriers Licence, Consignment Note, EWC Code Book, SIC Code.</p>
(16) Waste Batteries and Accumulators Regulations SI 2009/890	<p>The Regulations set out the legislative framework for the collection, treatment and recycling of waste portable, industrial and automotive batteries and accumulators in the UK. They complement the existing Batteries and Accumulators (Placing on the Market) Regulations SI 2008/2164, which establish the requirements for placing new batteries onto the market.</p> <p>Key requirements are set for all batteries, for:</p> <ul style="list-style-type: none"> • anyone placing batteries on the market to register as a producer of batteries, and report on waste batteries collected and sent for recycling; • the treatment and recycling of waste batteries. <p>For industrial and automotive batteries:</p> <ul style="list-style-type: none"> • from 1 January 2010, it is prohibited to dispose of waste industrial and automotive batteries by landfill or incineration; • producers of industrial and automotive batteries must arrange for their separate collection and recycling when they become waste. 	<p>As evidenced by:</p> <ul style="list-style-type: none"> - Observations – e.g. management systems audit - Incidents – e.g. zero complaints; zero environment agency enforcements - Disposal Site Licences <p>Documentation – e.g. Duty of care tickets, Waste Carriers Licence, Consignment Note, EWC Code Book, SIC Code.</p>
(17) Waste Electrical and Electronic Equipment Regulations SI 2006/3289	<p>The aim of the Regulations is to combat the rapid growth of waste electronic and electrical equipment (WEEE) and its impact on the environment due to its hazardous content. Measures are established for its treatment, reuse, recovery and recycling.</p>	<p>As evidenced by:</p> <ul style="list-style-type: none"> - Observations – e.g. management systems audit - Incidents – e.g. zero complaints; zero



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	<p>Compliance periods are established and producers are responsible for financing the costs of the collection, treatment, recovery and environmentally sound disposal of WEEE from electronic and electrical equipment (EEE) which they have marketed in the UK during that period.</p>	<p>environment agency enforcements</p> <ul style="list-style-type: none"> - Disposal Site Licences <p>Documentation – e.g. Duty of care tickets, Waste Carriers Licence, Consignment Note, EWC Code Book, SIC Code.</p>
<p>(18) Transfrontier Shipment of Waste (Amendment) Regulations 2014</p>	<p>If you wish to export – or import - waste products for whatever disposal route including recycling and recovery, you are subject to the Transfrontier Shipment of Waste Regulations 2007 (as amended).</p> <p>On 12 July 2007, updated European legislation came into force creating a more universal list of waste codes, and simplifying the procedures for notifiable and non-notifiable waste.</p> <ul style="list-style-type: none"> • All parties involved have a duty to manage the process in a way that protects the environment and human health. • Temporary storage, or interim recovery or disposal operations are included in the controls. • There must be a financial guarantee or appropriate insurance. • The charges for determining notifications have been changed. • Prior notification and written consent must be gained from the environmental regulator for the country from which the waste is being sent and the environmental regulator for the country where the waste is being received. • Only one waste code is allowed on each notification, which must be selected from the more generic list of waste codes. • Tracking and monitoring the movement of specified non-hazardous or 'green list' wastes is more strictly controlled. <p>Amendments reference the competent authorities and their duties.</p>	<p>As evidenced by:</p> <ul style="list-style-type: none"> - Observations – e.g. management systems audit - Compliance – e.g. zero complaints; zero environment agency enforcements <p>Documentation – e.g. TFS Documentation, Duty of care tickets, Waste Carriers Licence, EWC Code Book, SIC Code.</p>
<p>(19) Scrap Metal Dealers Act 2013</p>	<p>The legislation sets out changes to the Scrap Metal Dealers Act 1964 that regulated the scrap metal industry. The changes aim to remove the rewards that make metal theft such a low risk criminal enterprise for metal thieves and unscrupulous dealers.</p> <p>The revised legislation creates a new criminal offence which prohibits scrap metal dealers from paying for scrap metal in cash, only permitting electronic payment or payment by cheque. The Act also increases significantly the fines available for key offences so that the most serious breaches can result in a level 5 fine and revise the police powers of entry into scrap metal yards, allowing the police to enter, by warrant, any place to which admission is reasonably required to ascertain whether the prohibition on cash payments is being complied with.</p> <p>Provisions include:</p> <ul style="list-style-type: none"> • The License Holder must display a copy of the licence at each site; covered by the licence and display it in a prominent place that is accessible by the public; • The License Holder must verify the identity of the person selling the metal; • Under no circumstances should cash be paid for scrap metal by the License Holder; • The License Holder must make records of metal received and disposed of; • Councils have a right to enter licensed premises to check that the provisions of the Act are being observed; and • Councils have the power to revoke licences where the licensee no longer trades from the site, the site manager has moved on, or, significantly, if they are no longer satisfied that the licensee is a suitable person. 	

Water

Legislation	Summary	Compliant
<p>(20) Anti-Pollution Works Regulations SI 1999/1006</p>	<p>These Regulations came into force on 29 April 1999 and apply to England and Wales. They prescribe the contents of anti-pollution works notices served under section 161A of the Water Resources Act 1991. Provisions are made for appeals against a notice and for compensation in certain circumstances. Revocations and amendments</p>	<p>As evidenced by:</p> <ul style="list-style-type: none"> - Observations – e.g. workplace inspections, daily attendance



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	<p>These Regulations amend the:</p> <ul style="list-style-type: none"> ◦Control of Pollution (Applications, Appeals and Registers) Regulations SI 1996/2971; <p>These Regulations have been amended by the:</p> <ul style="list-style-type: none"> ◦Water Resources Act 1991 (Amendment) (England and Wales) Regulations SI 2009/3104. 	<ul style="list-style-type: none"> - Incidents – e.g. zero complaints, zero environment agency enforcements
<p>(21) Control of Pollution (Oil Storage) (England) Regulations SI 2001/2954</p>	<p>The aim of the Regulations is to require everybody in custody or control of oil to carry out certain works and take the necessary precautions in order to prevent the pollution of controlled waters.</p> <p>They apply where more than 200 litres of oil is stored above ground at industrial, commercial or institutional sites. They do not apply to waste oil.</p> <p>Certain requirements for the storage of oil are established.</p> <p>Oil must be stored in a container which will not leak or burst. In addition, the container must be bunded and the bund must:</p> <ul style="list-style-type: none"> ◦have a capacity of no less than 110% of the container's storage capacity within the system; ◦be impermeable to water and oil and not penetrated by anything. <p>Anything attached to the container must be within the bund, and any pipes must have a drip tray to catch any oil spilled.</p> <p>Where a drum is used to store oil and it uses a drip tray, the tray must have a capacity of no less than 25% of the drum's storage capacity or the aggregate storage capacity of the drums, if more than one is used.</p> <p>Separate provisions are also established for:</p> <ul style="list-style-type: none"> ◦fixed tanks; and ◦mobile bowsers. <p>If the Environment Agency believe there is a risk of pollution of controlled waters from oil, they can serve notice on the person who has custody or control of it and require them to carry out any works and precautions to minimise the risk.</p>	<p>As evidenced by:</p> <ul style="list-style-type: none"> - Observations – e.g. workplace inspections, bund in place and tank double lined for diesel storage, double lined oil tank for central heating system. - Incidents – e.g. zero complaints, zero environment agency enforcements
<p>(22) Trade Effluent (Prescribed Processes and Substances) Regulations SI 1989/1156</p>	<p>These Regulations came into force on 1 September 1989 and apply to England and Wales. They were made under sections 74 and 185 of the Water Act 1989. This Act has been repealed and the relevant enabling provisions are now sections 138 and 219 of the Water Industry Act 1991.</p> <p>Any discharge of trade effluent to a public sewer requires a trade effluent consent from the sewerage undertaker. However, where an application for consent or an application to vary a consent is sought in order to discharge special category effluent, the sewerage undertaker must send the application/variation application to the Environment Agency.</p> <p>These Regulations specify the two categories of trade effluent to sewers for which an authorisation is required from the Environment Agency.</p>	<p>As evidenced by:</p> <ul style="list-style-type: none"> - Observations – e.g. workplace inspections, Holding Tank used for containing vehicle wash water - Incidents – e.g. zero complaints, zero environment agency enforcements
<p>(23) Water Resources Act 1991</p>	<p>The aim of the Act is to set out the responsibilities of the Environment Agency in relation to water pollution, resource management, flood defence, fisheries, and navigation.</p> <p>Consent must be granted by the Environment Agency, before any:</p> <ul style="list-style-type: none"> ◦structure is erected in, over or under a watercourse; ◦alterations or repairs are carried out in, over or under a watercourse, if the work will affect the flow of water or impede any drainage works; ◦structure is erected or altered, which is designed to contain or divert the floodwaters of any main river. <p>Part 7 deals with anti-pollution works and their operations.</p> <p>The Environment Agency can carry out any necessary works and operations, where they believe any poisonous, noxious or polluting matter, or any solid waste, is likely to enter, or is present, in any controlled waters. They can also serve an anti-pollution works notice on anyone they feel has caused pollution of controlled waters.</p>	<p>As evidenced by:</p> <ul style="list-style-type: none"> - Observations – e.g. workplace inspections, Holding Tank used for containing vehicle wash water. - Incidents – e.g. zero complaints, zero environment agency enforcements



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(24) Groundwater (England and Wales) Regulations 2009

The groundwater directives aim to protect groundwater from pollution by controlling discharges and disposals of certain dangerous substances to groundwater.

We protect groundwater under these regulations by preventing or limiting the inputs of polluting substances into groundwater. Substances controlled under these regulations fall into two categories:

Hazardous substances are the most toxic and must be prevented from entering groundwater. Substances in this list may be disposed of to the ground, under a permit, but must not reach groundwater. They include pesticides, sheep dip, solvents, hydrocarbons, mercury, cadmium and cyanide. Hazardous substances replace the previous List 1 substances which came under the 1998 Groundwater Regulations (GWR).

Non-hazardous pollutants are less dangerous, and can be discharged to groundwater under a permit, but must not cause pollution. Examples include sewage, trade effluent and most wastes. Non-hazardous pollutants include any substance capable of causing pollution and the list is much wider than the previous List 2 substances. For example, nitrate is included as a pollutant but it was excluded from List 2 in the 1998 GWR.

The existing Groundwater Directive is to be repealed by the Water Framework Directive 2000/60/EC (WFD) in 2013.

As evidenced by:

- Observations – e.g. workplace inspections, Holding Tank used for containing vehicle wash water
- Incidents – e.g. zero complaints, zero environment agency enforcements

Pollution Prevention Control

Legislation	Summary	Compliant
(25) Pollution Prevention and Control Act 1999	<p>This Act applies to England, Scotland and Wales and section 7 on preventing pollution from offshore installations applies in Northern Ireland.</p> <p>Sections 1 and 2 of this Act allow the Secretary of State to make regulations providing for a pollution control system which replaces the previous system established under Part 1 of the Environmental Protection Act 1990 Act. This will meet the requirements of Directive 2008/1/EC, on integrated pollution prevention and control, Directive 99/31/EC, on landfill waste and for other measures to prevent and control pollution.</p> <p>New installations and those undergoing substantial change will be regulated under the new regime set up under this Act. Existing installations will be phased into the new regime, generally on a sectoral basis, before the 31 October 2007 deadline specified by Directive 2008/1/EC.</p>	<p>As evidenced by:</p> <ul style="list-style-type: none"> - Observations – e.g. workplace inspections - Incidents – e.g. zero complaints, zero environment agency enforcements

Noise & Nuisance

Legislation	Summary	Compliant
(26) Clean Neighbourhoods and Environment Act 2005	<p>The aim of the Act is to make considerable improvements with regard to the powers, duties and guidance for dealing with the problems associated with local environmental quality, in order to maintain a clean and safe environment.</p> <p>Part 3 deals with litter and refuse and extends the statutory offence for dropping litter and its application to all open places.</p> <p>Part 5 deals with waste and makes some minor provisions with regard to:</p> <ul style="list-style-type: none"> ◦ registration of carriers; ◦ fly-tipping; ◦ powers to collect and dispose of waste; ◦ site waste management. <p>Part 6 will deal with offences relating to dogs and will revoke the Dogs (Fouling of Land) Act 1996.</p> <p>Part 7 deals with noise and contains provisions relating to:</p>	<p>As evidenced by:</p> <ul style="list-style-type: none"> - Observations – e.g. workplace inspections - Incidents – e.g. zero complaints, zero environment agency enforcements



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	<ul style="list-style-type: none"> ◦designating areas as alarm notification areas; ◦nominating key-holders; ◦powers of authorised officers in relation to alarms. 	
(27) Noise and Statutory Nuisance Act 1993	<p>The aim of the Act is to work in conjunction with Part 3 of the Environmental Protection Act 1990, by extending the list of statutory nuisances contained in it to include noise in streets.</p> <p>They make provisions with regard to:</p> <ul style="list-style-type: none"> ◦consents to operate loudspeakers in streets or roads; ◦the installation of audible intruder alarms. <p>They also provide for authorised officers to enter any premises in order to turn off or deactivate an alarm, in certain circumstances.</p>	<p>As evidenced by:</p> <ul style="list-style-type: none"> - Observations – e.g. workplace inspections. - Incidents – e.g. zero complaints, zero environment agency enforcements

Dangerous Substances

Legislation	Summary	Compliant
(28) Carriage of Dangerous Goods and Use of Transportable Pressure Equipment Regulations SI 2009/1348	<p>The aim of the Regulations is to impose various requirements and prohibitions on the carriage of dangerous goods by road, rail and inland waterway and the use of transportable pressure equipment.</p> <p>Various provisions are established for those carrying dangerous goods in order to meet the requirements of ADR, RID and ADN, with regard to:</p> <ul style="list-style-type: none"> ◦carriage to be in accordance with ADR or RID; ◦alternative placarding requirements to apply to certain national carriage; ◦additional security requirements for carriage by road; ◦additional security requirements relating to access; ◦application of ADR to certain carriages by private individuals. <p>Some exemptions are established so the carriage of dangerous goods does not need to be in accordance with the above provisions.</p>	<p>As evidenced by:</p> <ul style="list-style-type: none"> - Observations – e.g. workplace inspections. - Incidents – e.g. zero complaints, zero environment agency enforcements - ADR compliance and DGSA representative
(29) Chemicals (Hazard Information and Packaging for Supply) Regulations SI 2009/716	<p>The Regulations aim to protect people and the environment from the harmful effects of dangerous chemicals by making sure users are supplied with information about the dangers.</p> <p>To achieve this, suppliers of chemicals are obliged to identify their hazards, such as flammability, toxicity, etc. and to pass on this information together with advice on safe use to users.</p> <p>The Regulations, to be known as CHIP 4, revoke and re-enact with amendments the Chemicals (Hazard Information and Packaging for Supply) Regulations SI 2002/1689, commonly known as CHIP 3. They require the supplier of a dangerous chemical to:</p> <ul style="list-style-type: none"> ◦identify the hazards of the chemical. This danger is known as the classification; ◦package the chemical safely; ◦give information about the hazards usually by means of information on the package, for example, a label. 	<p>As evidenced by:</p> <ul style="list-style-type: none"> - Observations – e.g. workplace inspections. - Incidents – e.g. zero complaints, zero environment agency enforcements - ADR compliance and DGSA representative
(30) The Control of Asbestos Regulations 2012	<p>The Control of Asbestos Regulations 2012 came into force on 6 April 2012, updating previous asbestos regulations to take account of the European Commission's view that the UK had not fully implemented the EU Directive on exposure to asbestos (Directive 2009/148/EC).</p> <p>The aim of the Regulations is to protect workers and those who may become exposed to asbestos fibres following work with materials containing asbestos. Most duties are placed on employers and those in control of non-domestic premises. They also prohibit the import, supply and use of materials containing asbestos.</p> <p>Anyone who has a duty with regard to non-domestic premises must carry out a risk assessment to determine whether asbestos is present in the premises as well as any work which may expose employees to asbestos.</p>	<p>As evidenced by:</p> <ul style="list-style-type: none"> - Observations – e.g. workplace inspections. - Incidents – e.g. zero complaints, zero environment agency enforcements - ADR compliance and DGSA representative



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	<p>If this turns out to be the case, a written plan must be produced which outlines the control measures to be taken which will monitor and reduce the risk. Before any work with asbestos can be carried out, a plan of work must be produced. This will include details on the:</p> <ul style="list-style-type: none"> ◦nature and length of the work; ◦measures taken to prevent or reduce exposure to asbestos. <p>All work carried out with asbestos must be subject to a licence granted by the Health and Safety Executive (HSE). The enforcing authority must be pre-notified before any such work can begin.</p> <p>From 6 April 2012, some non-licensed work needs to be notified to the relevant enforcing authority.</p> <p>From 6 April 2012, brief written records should be kept of non-licensed work, which has to be notified e.g. copy of the notification with a list of workers on the job, plus the level of likely exposure of those workers to asbestos. This does not require air monitoring on every job, if an estimate of degree of exposure can be made based on experience of similar past tasks or published guidance.</p> <p>By April 2015, all workers/self employed doing notifiable non-licensed work with asbestos must be under health surveillance by a Doctor. Workers who are already under health surveillance for licensed work need not have another medical examination for non-licensed work. BUT medicals for notifiable non-licensed work are not acceptable for those doing licensed work.</p> <p>Some modernisation of language and changes to reflect other legislation, e.g. the prohibition section has been removed, as the prohibition of supply and use of asbestos is now covered by REACH (Registration, Evaluation, Authorisation and Restriction of Chemicals Regulations 2006).</p>	
<p>(31) Control of Substances Hazardous to Health Regulations SI 2002/2677</p>	<p>The main aim of the Regulations is to control the exposure of people to hazardous substances. They do this by imposing duties on employers to carry out risk assessments, prevent or control exposure to hazardous substances and monitor the exposure of employees. They are commonly referred to as COSHH.</p> <p>Certain hazardous substances are prohibited.</p> <p>Employers must carry out risk assessments before work with hazardous substances is commenced. Employers who employ 5 or more people must record the significant findings of the risk assessment.</p> <p>Employers must provide employees with information, instruction and training on the substances they are likely to be exposed to, including the risks they pose and the precautions they can take to protect themselves.</p> <p>Employers must make sure that accident and emergency procedures have been prepared, which should include safety drills and the provision of first-aid facilities.</p>	<p>As evidenced by:</p> <ul style="list-style-type: none"> - Observations – e.g. workplace inspections. - Incidents – e.g. zero complaints, zero environment agency enforcements - COSHH Assessment and Risk Assessment File.

Other

Legislation	Summary	Compliant
<p>(32) Contaminated Land (Wales) Regulations SI 2006/2989</p>	<p>The aim of the Regulations is to make provisions for a contaminated land regime, in accordance with Part 2A of the Environmental Protection Act 1990, which includes actions for the remediation of such land. In addition, they provide a definition of special sites.</p> <p>Contaminated land is defined under Part 2A of the Environmental Protection Act 1990 and is identified by local authorities and the Environment Agency, with the National Assembly for Wales making a final decision if required. However, contaminated land which falls within a certain description can be designated as a special site. Often this includes land which has caused pollution to controlled waters.</p>	<p>As evidenced by:</p> <ul style="list-style-type: none"> - Observations – e.g. workplace inspections, Environmental Initial Status Review



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<p>(33) Building Regulations SI 2010/2214</p>	<p>The Regulations replace the Building Regulations SI 2000/2531 and bring together all the changes which have subsequently been made to them into one piece of legislation. This should make the Regulations easier to read and refer to.</p> <p>The Regulations aim to ensure the health, safety, welfare and convenience of people in and around buildings, as well as the water and energy efficiency of buildings.</p> <p>They apply to newly constructed or altered buildings which are used for domestic, commercial or industrial purposes.</p> <p>They cover both the technical standards that need to be met and the procedures that need to be followed when building work is carried out. The procedures include giving the local authority a building notice, full plans or a certificate issued under the self-certification scheme.</p> <p>There are also procedures to be followed when work is shortly to begin or has been recently completed.</p> <p>The local authority can test the building work to ensure it complies with the requirements of the Regulations. They also have the power to issue regularisation certificates when previously unauthorised work is brought into compliance with the applicable requirements.</p>	<p>As evidenced by:</p> <ul style="list-style-type: none"> - Observations – e.g. workplace inspections
<p>(34) Health and Safety at Work etc Act 1974</p>	<p>The Health and Safety at Work Act 1974 imposes general duties on everybody connected with work. The Act contains:</p> <p>The general duties contained in the Health and Safety at Work Act for employers to aim to maintain or improve standards of health and safety at work, to protect other people against risks arising from work activities, to control the storage and use of dangerous substances and to control certain emissions into the air.</p> <p>Employers ensure their activities do not endanger anybody and to provide information, in certain circumstances, to the public about any potential hazards. Also companies have to control premises, which are non-domestic and used as a place of work, to ensure they do not endanger those who work within them. This extends to plant and substances, means of access and egress as well as to the premises themselves.</p> <p>Employers</p> <p>Section 2(2)(a-e) Without prejudice to the above, the matters to which the duty extends include:</p> <p>(a) Provision and maintenance of safe plant and safe systems of work.</p> <p>(b) Arrangements for ensuring safe means of handling, use, storage and transport of articles and substances.</p> <p>(c) Provision of information, instruction, training and supervision</p> <p>(d) Provision of a safe place of work and provision and maintenance of safe access and egress to that workplace.</p> <p>(e) Provision and maintenance of a safe working environment and adequate welfare facilities. (Note: The above duties are all qualified by the term "so far as is reasonably practicable".)</p> <p>Employees</p> <p>Section 7 (a-b) it shall be the duty of every employee while at work:</p> <p>(a) To take reasonable care for the health and safety of himself and others who may be affected by his acts or omissions at work.</p> <p>(b) To co-operate with his employer or any other person, so far as is necessary, to enable his employer or other person to perform or comply with any requirement or duty imposed under a relevant statutory provision.</p>	<p>As evidenced by:</p> <ul style="list-style-type: none"> - Observations – e.g. workplace inspections, Relevant signage displayed. - Incidents – e.g. zero complaints
<p>(35) Welsh Assembly Government Documentation</p>	<p>Welsh specific documentation published by the Welsh Assembly Government which is relevant to the sector:</p> <p>WAG – Environment Strategy for Wales (2006)</p> <p>WAG – Towards Zero Waste (June 2010)</p> <p>WAG – Industrial Commercial Sector Plan (Dec 2013)</p>	<p>As evidenced by:</p> <ul style="list-style-type: none"> - Observations – e.g. documents saved on computer system for reference.
<p>(36) Waste Management</p>	<p>Copy of Environmental Permit and Exemption letter which outlines the activity allowed on EPS Materials Recovery Ltd's site.</p>	<p>Evidence shown in:</p> <ul style="list-style-type: none"> -Company Document Folder



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Permits and Exemption		
(37) Waste Carriers Licence	Certificate of Registration from the Environment Agency certifying that Environmental Practical Solutions Ltd have the authority to transfer waste on vehicles from customer locations to disposal outlets.	Evidence shown in: -Company Document Folder
(38) Goods Vehicle Operators Licence	Legislative Body of VOSA allows Environmental Practical Solutions Ltd to operate vehicles on the public highways.	Evidence shown in: -Company Document Folder
(39) Public and Employers Liability Insurance	Insurance documentation that must be held to carry out work for customers.	Evidence shown in: -Company Document Folder
(40) Motor Insurance	Insurance documentation that must be held to allow Environmental Practical Solutions Ltd vehicles operate on public highways.	Evidence shown in: -Company Document Folder
(41) Lonham Marine Liability Policy		Evidence shown in: -Company Document Folder
(42) Hazardous Waste Premises Code	Registration with the Environment Agency if the operating site produces more than 500kg of Hazardous Waste per annum.	Evidence shown in: -Company Document Folder
(43) Vehicle MOT and Service Documentation	Documentation that has to be provided and valid to show that all Environmental Practical Solutions Ltd/EPS Materials Recovery's vehicles are road worthy to operate on public highways.	Evidence shown in: -Vehicle Maintenance and Service File
(44) VOSA Hazardous Waste Haulage Requirements	Compliance allows Environmental Practical Solutions Ltd to carry out Hazardous Waste Transportation from customer locations.	Evidence shown in: -VOSA Hazardous Waste File



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ROI1 Site Rules

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ROI1 Site Rules

You are requested to read the following standards and must understand and respect them. Compliance with these standards is mandatory. Failure to comply with these standards may result in you being asked to leave the site. If you are carrying out work on-site please ensure you take this form and report to your EPS Materials Recovery Ltd contact.

Hi-visibility vests and safety shoes must be worn at all times in the yard and Non-ferrous Processing Building areas.

EPS Materials Recovery Ltd are committed to the environment, continual improvement, prevention of pollution, and ISO14001 certification. You are required to respect this policy and comply with the standards.

Working Procedure – All contract work must be carried out to the procedures outlined in any risk assessments provided for the specific activities and maintain a safe working environment within the area of work.

Material Use and Waste – All materials used to carry out on-site work must be controlled to ensure no impact on the environment and if the material is Hazardous then a MSDS sheet needs to be provided prior to use. If there are any empty containers or excess material these are the responsibilities of the sub-contractor and need to be taken off-site when the work is complete. At **no point** should any empty container or container containing material be washed out on-site or left on-site when work is complete.

Sharps – Any sharp cutting instruments brought in by a contractor or visitor must be notified to the EPS Materials Recovery contact and must be removed from site following completion of work.

Eating and Drinking – Consumption of foodstuffs and drinks is permitted on-site in designated areas however all waste and containers must be disposed of using the bins situated at various locations in the yard and Non-ferrous Processing Building area.

Smoking – Smoking is strictly prohibited on-site. This includes electronic cigarettes.

Vehicle Use - When driving any vehicle/forklift on-site all pedestrians have right of way and the driver of the vehicle/forklift must slow down/stop to allow the pedestrian time to pass, while also ensuring there is sufficient distance between the pedestrian and vehicle. The responsibility for this lies with the driver of the vehicle/forklift.

Pedestrians – All pedestrians must be vigilant when in the Yard and Processing Building areas and ensure they stay alert to any moving machinery or vehicles which could be operating in the area.

Personal Protective Equipment - Where you are issued or required to wear any protective and/or safety clothing, equipment etc. you must use it at all times as instructed.

Accidents and Incidents – Accidents or incidents, no matter how slight, must be reported to your EPS Materials Recovery contact immediately.

Site Information - You should acquaint yourself with all authorised notices displayed within the area of work.

I have read and understood the above and agree to abide by EPS Materials Recovery Ltd standards and rules.

Print Name: **Company:**.....

Signature: **Date:**.....

Please Note:

This pre requisite summary sheet must be retained at all times when on EPS Materials Recovery Ltd premises. Failure to comply with these requirements and not being able to present this sheet on request may result in you having to leave site.



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ROI2 Further Help

Pollution Prevention Guides

(<https://www.gov.uk/government/collections/pollution-prevention-guidance-ppg> and <http://webarchive.nationalarchives.gov.uk/20140328084622/http://www.environment-agency.gov.uk/business/topics/pollution/39083.aspx>)

PPG1: Basic good environmental practices

PPG2: Choosing and using oil storage tanks

PPG3: Choosing and using oil separators

PPG4: Sewage treatment and disposal where there is no foul sewer

PPG5: Works in, near or over watercourses

PPG8: Safe storage and disposal of used oils

PPG13: Vehicle washing and cleaning

PPG18: Managing fire water and major spillages

PPG21: Pollution incident response planning

PPG22: Dealing with spills

Pollution Prevention Pays – Getting Your Site Right (24-page Guide & DVD)

(<http://webarchive.nationalarchives.gov.uk/20140328084622/http://www.environment-agency.gov.uk/business/topics/pollution/36641.aspx>)

How to Comply with Your Environmental Permit

(<https://www.gov.uk/government/publications/how-to-comply-with-your-environmental-permit>)

NetRegs – NetRegs provides **free environmental guidance** for small and medium-sized businesses in the UK

(<http://www.netregs.gov.uk/>)

Natural Resources Wales Contact Information – National Customer Contact Centre

<http://naturalresources.wales/about-us/contact-us/general-enquiries/?lang=en>

Maes Newydd
Llandarcy
Neath Port Talbot
SA10 6JQ

Telephone: 0800 807060 (24 hour service)



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ROI3 Protecting the Environment

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ROI3a Good Management Pays

Good Management Pays



Look out for:

- Smells
- Noise
- Dust
- Pests
- Spills and leaks



The illustration depicts a recycling facility. In the foreground, a woman in a yellow shirt pushes a blue stroller with a child inside. To the left, there are blue recycling bins labeled 'BOTTLES', 'CANS', and 'BATTERIES'. A yellow excavator is working in the background. A blue truck is dumping a large pile of material, creating a cloud of dust. In the bottom right corner, a diagram shows a cross-section of the ground with a house and a well. It labels 'OIL' and 'DRINKING WATER' and shows arrows indicating 'LEACHING INTO GROUNDWATER / DRINKING WATER'.



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ROI3b Protecting the Environment

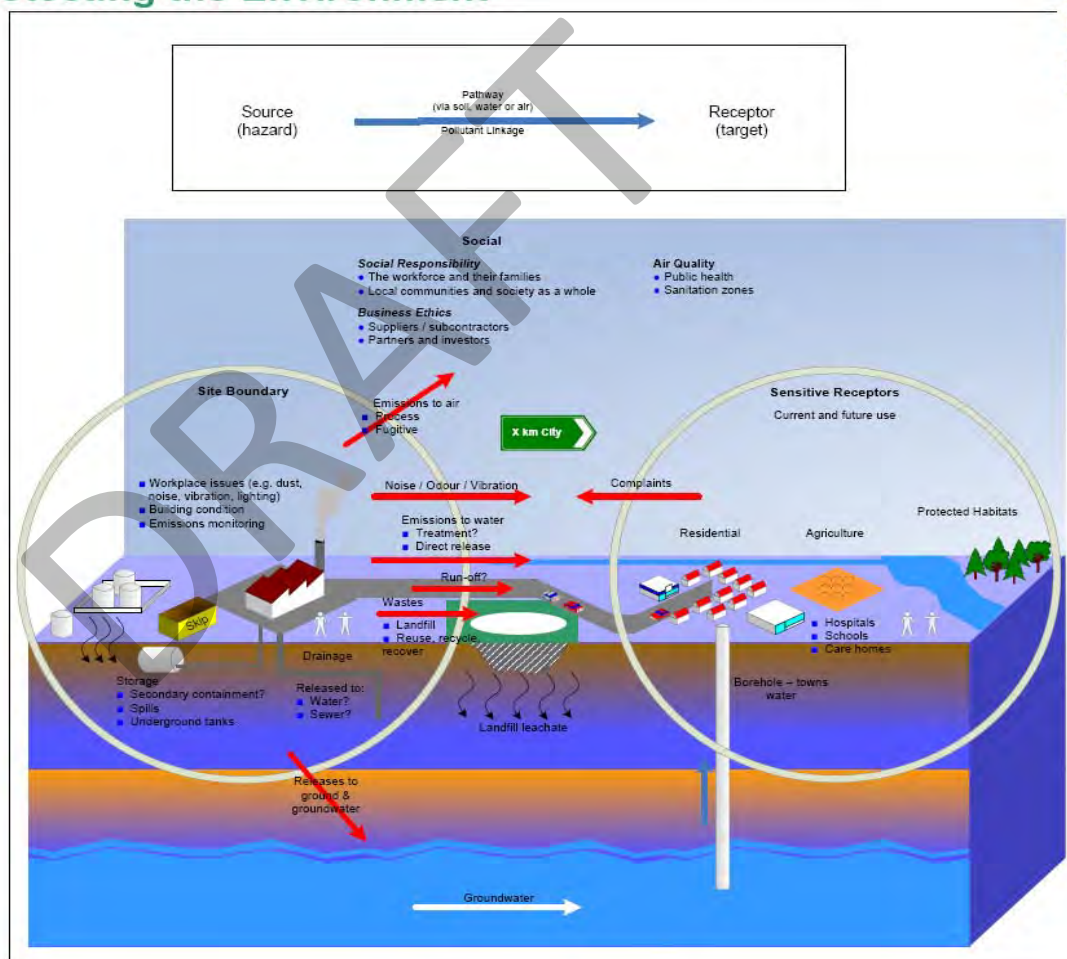
Protecting the Environment

This site's main potential **pollution sources** are:

- [e.g. Storage of waste oils in drums]
- [e.g. Fibrous asbestos storage]
- [e.g. Potential for dust creation if site roads are not damped down]

Sensitive **environmental receptors** at or near the site are:

- [e.g. Underground aquifer used for supplying drinking water]
- [e.g. Houses and gardens to the south of the site]
- [Site of Special Scientific interest next to building B3]





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Risk Assessments

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Environmental Risk Assessments

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RA1 Register of Risk Assessments

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RA2 Environmental Risk Assessments

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Environmental Risk Assessments

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