

FUGITIVE EMISSIONS MANAGEMENT PLAN

Land adj to The Merchant House, Prince William Ave, Sandycroft, Flintshire CH5 2QZ

Hollingsworth Bros (UK) Ltd

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1 Introduction

1.1 Scope of document

1.1.1 This Fugitive Emissions Management Plan (FEMP) has been produced in support of an application for an Environmental Permit SR2010No.11 and associated Deployment application, which has been submitted to cover the importation, storage and treatment of non hazardous inert and excavation materials to produce secondary aggregates and soils for recovery/reuse on Land adj to The Merchant House, Prince William Ave, Sandycroft, Flintshire CH5 2QZ. This document will assess the potential impacts on the surrounding environment as a result of fugitive emissions associated with the processes proposed on site and outline a number of mitigation measures to ensure the highlighted impacts are reduced.

1.2 Overview of proposal

1.2.1 In order for the operator to utilise the SR2010 No11 permit at a site, a valid Deployment Application using Form MPD1 must be duly completed and submitted to Natural Resources Wales's Permitting Support Centre for assessment.

1.2.2 An activity associated with this permit must not be carried out until Natural Resources Wales (NRW) have approved the duly completed Deployment Application or 25 working days from the submission of the Deployment Application, whichever is the sooner.

1.2.3 A valid deployment for a site will last for 12 months from the date of issue and limits the throughput of waste to <75,000 tonnes. If the total amount of waste to be treated at any one site under a single deployment exceeds 75,000 tonnes and/or the activity will last longer than 12 months, a new deployment will be required. Waste treatment processes to be carried out on site may include the following:

- Sorting (with loading shovel/360° excavator or by hand)
- Screening (by using appropriate mechanical screening plant and equipment)
- Separation (by using appropriate mechanical screening plant and equipment)
- Crushing (by Crusher)

- Blending (by loading shovel / 360° tracked excavator)

- 1.2.4 The site associated with the deployment request is located at NGR SJ 339 670 and is approximately 1.24 hectares in area, a rectangular plot of land approximately 180 m x 70m located off Prince William Avenue, Sandycroft. The site is shown on Drawing No. PWA/938/02.
- 1.2.5 The general area of Sandycroft has a long established industrial usage with industrial estates and business parks located along the River Dee Estuary. The estates continue along the estuary to the A4894 trunk road and beyond.
- 1.2.6 Hollingsworth Bros (UK) Ltd are proposing to import clean excavation and construction/demolition wastes which will be processed using mobile plant and then the resulting secondary aggregates will be used on site to raise the floor levels for the industrial units being constructed on site.
- 1.2.7 This document has been produced to accompany an application for a Medium Risk Deployment under SR2010No.11.
- 1.2.8 This FEMP has been prepared on behalf of Hollingsworth Bros (UK) Ltd by Oaktree Environmental Ltd. Contact details are as follows:

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1.3 Description of process

- 1.3.1 Primary operations include the use of mobile crushing plant on a temporary basis and a screening plant for size reduction and automated separation/grading of aggregates. This operation would produce valuable secondary aggregates as alternatives to virgin aggregates and recover topsoil/subsoil for re-use on site in development to raise the floor levels as required by the local planning authority

and Natural Resources Wales as part of the approved development to construction six industrial buildings on the application site. The site will receive the materials predominantly from in-house operations from the applicant's construction/demolition arm of the business and also from other known contractors/hauliers.

1.3.2 The site will operate in-line with the company's WRAP Protocol so the secondary aggregates produced at the site can be classified as fully recovered on the application site and can then be utilised in the building/construction project detailed above, as a secondary resource.

1.3.3 All treatment processed will be operated by the applicant and will include the following:-

- Compacting (by loading shovel / 360° excavator)
- Sorting (with loading shovel / 360° excavator or by hand)
- Screening (by using appropriate mechanical screening plant and equipment)
- Separation (by using appropriate mechanical screening plant and equipment)
- Crushing (by using appropriate crushing plant)
- Blending (by loading shovel / 360° excavator).
- Water bowser (dampening down surfaces/stockpiles)

1.3.4 This plan has been written to outline the controls required on site to ensure that fugitive emissions from any item of plant can be controlled effectively.

1.4 Waste types

1.4.1 The waste types handled on site will consist of non-hazardous excavation materials (i.e. hardcore, brick, stone, etc.) arising from activities within the surrounding area. Details of the accepted waste types are provided in Appendix III of the site's EMS (Doc. Ref. 2712-938-MS-01).

1.5 Plant & Equipment

1.5.1 The type of plant used varies according to the volumes of stockpiles held. In summary the following processing mobile plant may be used on site:

- i) Crusher
- ii) Screener
- iii) Loading shovel/excavator

1.5.2 Abatement equipment available to the operator (site specific) may include:

- i) Wind boards
- ii) Conveyor hoods
- iii) Spray bars
- iv) Fixed sprinklers (mains or mobile supply)
- v) Vacuum sweeper
- vi) Water bowsers
- vii) Hose Reels
- viii) Mobile pressure wash
- ix) Dust control fencing

1.5.3 Personal Protective Equipment will be issued to all plant operators to ensure their safety. Such items will include safety goggles, gloves, hi-visibility vests/jackets, ear defenders/plugs, hard hats and safety boots. All staff will be trained in the correct usage of their PPE and the plant and equipment they manage. Training records will be kept in the site office.

1.5.4 Essential spares for plant maintenance will be kept at the applicant's head office/workshop. If there is a risk that dust will be emitted following a malfunction or breakdown the plant will be shut down for repairs and the stockpile handled in accordance with the procedures outlined in Section 3.0.

2 Risk Assessment

2.1 Details of assessment

2.1.1 Risk assessment is the standard tool by which environmental hazards (source) are assessed for their potential impacts upon receptors through defined pathways. Risk assessment assists in providing a better understanding of the potential impacts from the site being studied and permits facilitation of remedial action if required through further investigation and action. This section assesses the environmental factors and the potential liabilities presented by the risks evaluated in a qualitative format.

2.2 Potential sources of dust emissions

2.2.1 Observation of activities similar to those on site reveals that the sources of dust arise from the following actions, in the absence of mitigation:

- i) Unloading of wastes
- ii) Infilling operations
- iii) Vehicle movement on surfaced and unsurfaced ground
- iv) Un-sheeted vehicle loads

2.3 Potential pathways for dust emission

2.3.1 The main pathway for dust is airborne transmission, which can deposit material on the ground off site, in breach of planning and permitting conditions as well as being a potential health and safety hazard to staff on site. Dust can also be deposited into surface water causing a reduction in water quality.

2.3.2 The main hazards are presented when dust settles on the ground and is consequently disturbed by the wind, by surface runoff (as mud/silt) or by activities on site. Wind speeds in excess of 11 knots (5.7 m s^{-1}) can lead to fugitive dust being transported some distance from a source. The distance that dust can travel once airborne will depend on a number of factors, including size of particles, wind speed, rainfall and local topography.

2.3.3 Potential dust emissions from the proposed operations may comprise of finer particles, which are defined as particulate matter <10µm in aerodynamic diameter (PM10) and coarser particles (>10µm in diameter), sometimes referred to as nuisance dust. Particles >30µm in diameter will largely deposit within 100m of a source, whilst intermediate sized particles (10-30µm) may travel up to 500m from a source. Finer particulate matter (PM10), would be expected to make up the smallest portion of particulate emissions from the proposed activities, are typically deposited more slowly and may travel up to 1,000m from a source. PM10 defines particles fine enough to enter the lungs upon inhalation and can impact upon human health and, over time, may lead to carcinogenic effects.

2.4 Receptors of potential dust emissions

2.4.1 The main receptors are staff on site, as they are in close proximity to the dust source. All other receptors should be protected by following the procedures outlined in this plan, as dust has to be mitigated within the site boundary to comply with the environmental permitting regime. Nevertheless, Table 1 below contains a list of identified receptors, sensitive to emissions of dust, in relatively close vicinity of the site (approximately 350m). The procedures set out in Section 3.0 are designed to ensure that dust is not emitted beyond the site boundary and is suitably controlled within the site.

Table 1 – Potential sensitive receptors to emission within 350m of the site.

Receptor Identifier	Receptor Description	Direction	NGR	Approximate distance from site (m)
D1	Industrial Properties on Prince William Ave	South-east	Start at SJ 34006 67089 End at SJ 34199 66952	Bordering
D2	Industrial Properties on Prince William Ave	North-west	Start at SJ 33942 67115 End at SJ 33727 67229	Bordering

Receptor Identifier	Receptor Description	Direction	NGR	Approximate distance from site (m)
D3	Industrial Properties on Prince William Ave	North, North-east	Start at SJ 34341 67153 End at SJ 33733 67381	Bordering
D4	Residential Properties on Station Road	West	Start at SJ 33706 67215 End at SJ 33666 67268	250m
D5	Industrial Properties on Station Road	North-west	Start at SJ 33688 67350 End at SJ 33886 67574	250m
D6	Residential Properties on Station Terrace	West	SJ 33627 67254	340m
D7	River Dee	North	SJ 34160 67513	350m

2.4.2 Significant impacts would be considered more likely to occur within close range (<100m) of a site. Therefore, the impact from nuisance dust at all dust sensitive residential receptors is predicted to be negligible, as the only areas within 100m of the site are neighbouring industrial premises.

2.4.3 Despite the fact that negligible impacts from nuisance dust are predicted, the potential for PM10 emissions from the site to have an adverse impact on the surrounding area is still a possibility. Therefore, a series of dust control measures are discussed in section 3, which will be used on site to minimise potential for fugitive dust release.

2.5 Potential sources of noise and vibration

2.5.1 This FEMP will mainly focus on mitigation measures in place on site to reduce the impact from noise and vibration on the surrounding areas.

2.5.2 The following items of plant have been identified as the main sources of noise on site. They have been listed in order of the amount of noise recorded at the given

distance (highest to lowest), which was taken from previous measurements of similar equipment.

- i) 360° excavator (13 tonnes) – 81 decibels at 5m
- ii) Terex Crusher – 85 decibels at 7m
- iii) 9 tonne dumper – 63 decibels at 10m

2.6 Pathways for noise and vibration

2.6.1 When a sound wave meets an obstacle, some of the sound is reflected back from the surface and some of the sound passes into the obstacle material, where it is absorbed or transmitted through the material. Therefore, noise emissions from sources which are not within sight of the receptor are greatly reduced.

2.7 Receptors of potential noise emissions

2.7.1 As with dust, the main receptors are staff on site, as they are in close proximity to the noise source. All other receptors should be protected by following the procedures outlined in this plan. Table 2 contains a list of identified receptors, potentially sensitive to noise, in relatively close vicinity of the site (approximately 350m).

Table 2 – Potential sensitive receptors to noise within 350m of the site.

Receptor Description	Distance from site (m)
Industrial Properties on Prince William Ave (SE)	Bordering
Industrial Properties on Prince William Ave (NW)	Bordering
Industrial Properties on Prince William Ave (NE)	Bordering
Residential Properties on Station Road	250
Industrial Properties on Station Road	250
Residential Properties on Station Terrace	340
River Dee	350

- 2.7.2 Due to the location of the activities being situated within an industrial area potential noise impacts associated with the proposed operations are considered to be negligible. Despite the fact that negligible impacts from noise are predicted, a series of noise and vibration control measures are discussed in section 3 and will be implemented on site to minimise potential for fugitive noise emissions.

2.8 Potential sources of litter

- 2.8.1 The fugitive emission of litter from the site is unlikely to present a problem, due to the nature of the waste accepted at the site (i.e. non-hazardous, inert and excavation materials). However, there will be mitigation measures in place on site to ensure any litter which is found on site is not transported beyond the site boundary, where it could cause a detrimental impact on the surrounding environment.

- 2.8.2 Sources of litter on site may include the following:

- i) Incoming loads - where non-compliant light waste is hidden within a predominantly compliant load and not discovered until acceptance or deposit on site.
- ii) Storage of rejected waste – if waste is rejected from incoming loads, it may be stored in a designated skip on site prior to removal.
- iii) Site office / welfare areas – a small amount of light material will be brought on site by staff/drivers/contractors working on site

2.9 Potential pathways for litter emission

- 2.9.1 The main pathway for litter is airborne transmission, which can pick up light material on the ground and transport it off site, in breach of planning and permitting conditions. Light waste can also be transported by surface runoff or by activities on site.

2.10 Potential receptors of litter

The potential impacts from litter associated with the proposed operations are negligible, as the amount expected on site is minimal. Nevertheless, a series of

control measures are discussed in section 3, which will mitigate against any possible litter emissions.

3 **Mitigation Measures**

3.1 **Dust mitigation**

3.1.1 Consideration has been given to the potential sources, pathways and receptors of dust emissions from the site and the following mitigation measures have been agreed as the best methods to impede dust emission from the site. These measures will be implemented on site.

3.1.2 Mitigation measures to combat dust emissions as a result of the transport of material or the movement of vehicles are described below.

- a) **Sheeting of delivery vehicles** – all vehicles delivering material to or removing material from the site will be sheeted to prevent the fugitive release of dust during transport.
- b) **Hardstanding site roads** – All site access roads will be made of hardstanding and will be regularly damped down using a water bowser.
- c) **Sweeping of site roads** – surfaced haul roads on site will be swept, as required, with a tractor and brush or road sweeper. This will remove dust and mud deposits which could potentially be emitted from the site.
- d) **Speed limit** – Vehicle speeds will be restricted to 5mph on all site roads. Signs will be erected at the relevant areas of the site to advise drivers of the speed limit. This will reduce the likelihood of dust as a result of vehicles churning up the road surface.
- e) **Regular maintenance of surfaces** – All internal haul roads and access roads will be regularly checked and appropriately maintained to ensure they are in good condition and free of potholes. This will ensure surfaces are consolidated and, therefore, less likely to emit dust.
- f) **Inspection of public highway** - Any mud/dust deposited onto the public highway will be treated as an emergency and cleaned by operatives or by way of a road sweeper which would be hired-in as necessary.

3.1.3 Mitigation measures to impede dust emission from stored material on site are outlined below:

- a) **Height restriction on stockpiles** – Stockpiles will be kept below 6m. This will prevent the wind whipping up material and transporting it off site.
- b) **A permanent water supply** will be made available on site in all climatic conditions to ensure that the dust suppression systems can function effectively.
- c) **Dampening stockpiles** – Stockpiles will be damped down if necessary using the mobile water bowser on site, especially in particularly dry or windy conditions. This will impede the release of fugitive emissions from stored waste.
- d) **Appropriate stockpile locations** - Stockpiles will be located to ensure that vehicles leaving the site do not track through the material, to prevent deposit of debris on the highway.
- e) **Measures for adverse conditions** - During particularly adverse windy conditions, stockpiles will be reduced in height and conditioned with crusting agents, if necessary, to further impede airborne transport of material.

3.1.4 Mitigation measures to impede dust emissions whilst depositing or transporting waste for recovery or storage or when processing waste are outlined below:

- a) **Tipping of loads** - Vehicles will be directed by the plant operators to deposit loads adjacent to lee side of existing stockpiles to reduce the effects of wind. Drivers will not be permitted to travel with raised vehicle bodies
- b) **Restricted drop heights** – Drop heights will be kept to a minimum when loading, unloading or spreading material. Rubber wheeled shovels will be used.
- c) **Appropriate loading locations** - The operator of the loading plant will direct vehicles to a position and location which reduces wind whipping of material (i.e. the lee side of the loading plant). The locations of the stockpiles and the location of the mobile plant will however be influenced by the construction development on site. The secondary aggregate material processed on site using the mobile plant will be used to raise the floor level of the proposed six industrial units which the site has been granted planning permission.

- d) **Dampen down treatment areas** - Water based sprays will be fitted as standard for dust suppression over the feed area of the crusher and the crusher's discharge conveyor. A water hose will be available in addition to the fixed water suppression on the crusher and screen (if fitted) to allow the operator to spray areas on or around the machinery which are likely to give rise to dust emissions ie.
 - i. Feed area/hopper/crushing chamber
 - ii. Discharge point onto conveyors (the discharge points will be enclosed as far as is practicable)
 - iii. The discharge conveyor
- e) **Open conveyors and discharge conveyors without dust suppression** - The discharge conveyor on the crusher will be fitted with spray bars connected to the mains or a mobile water supply. The spray bars will be turned on when the crusher is in use as determined by the plant operator in accordance with the conditions of the Environmental Permit for the crusher.
- f) Wind boards will be made available if required to enclose wind sensitive areas of conveyors to reduce the risk of dust emissions. Where material <3 mm in size is present in the material to be screened or crushed the last metre of the final size discharge conveyor and the first metre of the free fall of the materials will be fitted with a hood to reduce dust emissions.
- g) **Restricted Drop heights from all discharge points** - will be kept to a minimum when loaded and unloading to prevent dust emissions where adjustment of conveyors permits
- h) **Appropriate stockpile locations** - Stockpiles will be located to ensure that vehicles leaving the site do not track through the material, to prevent deposit of debris on the highway.
- i) **Measures for adverse conditions** - During particularly adverse windy conditions, stockpiles will be reduced in height and conditioned with crusting agents, if necessary, to further impede airborne transport of material.

3.2 Noise and vibration mitigation

3.2.1 Consideration has been given to the potential sources, pathways and receptors of noise and vibration emissions from the site and the following mitigation measures have been agreed as the best methods to impede noise or vibration pollution from the site. These measures will be implemented on site at the start of operation.

3.2.2 Mitigation measures to combat fugitive noise and vibration emissions as a result of the transport of material or the movement of vehicles are described below.

- a) **Sensible driving on site** - All vehicles are required to be driven onto and off site with due consideration for neighbouring premises. Engines will be switched off when not in use.
- b) **Maintained and silenced vehicles** - Vehicles must be well maintained and operated with silencers. Moving parts will be regularly inspected and lubricated.
- c) **Speed limit** - Vehicle speeds will be restricted to 5mph on all site roads.
- d) **White noise alarms** - Reversing alarms to be preferentially fitted with white noise alarms to minimise impacts on neighbouring sites.

3.2.3 Mitigation measures to combat fugitive noise and vibration emissions as a result the running of plant and machinery on site are described below:

- a) **Acoustic guards** - Any acoustic guards or covers must be fitted on plant at all times.
- b) **Avoid constant running** - All plant and machinery should be switched off when not in use.
- c) **Appropriate deposition of material** - The following measure will be followed when depositing material:
 - i) Only one vehicle will be allowed to tip in the working area at any one time.
 - ii) Loading shovels and vehicle bodies will not be shaken when depositing material, to avoid unnecessary noise.
 - iii) The material in the shovel will be carefully emptied (slowly) rather than all being dropped in one go.

- iv) Drop heights will be kept to a minimum, particularly when unloading larger, heavier material, to minimise noise/vibration.
 - v) Drivers will lower the tipper body for inert waste deposits before driving away from the reception area.
- d) **Appropriate removal of material** - The following measures will be followed when removing material:
- i) Drop heights will be kept to a minimum, particularly when loading empty tipper wagon/skip/container, to minimise noise/vibration.
 - ii) The operation of the buckets and similar plant should be such that they are not banged onto the ground when they are being filled. Obviously, the buckets are usually scraped along the ground to collect the waste but it is unlikely that this operation will result in excessive vibration being caused.
- e) **Maintained and silenced plant** - Plant to be well maintained and operated with silencers where possible. Moving parts to be regularly lubricated.

3.3 Litter mitigation

3.3.1 Although unlikely to present a substantial risk on site, consideration has been given to the potential sources, pathways and receptors of litter emissions from the site and the following mitigation measures have been agreed as the best methods to impede litter being blown beyond the site boundary. These measures will be implemented on site at the start of operation. Mitigation measures to combat fugitive litter emissions are described below:

- a) **Sheeting of vehicles** - all vehicles delivering material to or removing material from the site will be sheeted to prevent the fugitive release of material. If unknown litter is present in incoming loads, this will prevent it from escaping the vehicle body.

- b) **Secure storage of rejected material** – All litter found within incoming loads or on site surfaces will be deposited and stored within a designated rejected waste skip on site. This skip will be covered and regularly emptied. This will reduce the likelihood of airborne transport of litter and keep levels of litter on site to a minimum.
- c) **Daily clean-up** – The site will be inspected daily, as described in section 4, and any litter found will be immediately stored in the rejected waste skip. In addition, site staff will be trained to immediately pick up litter they encounter throughout the day.

4 Monitoring and Recording

4.1 Visual Assessment

- 4.1.1 The site supervisor will make a visual inspection any fugitive emissions at the site perimeter at least twice daily when the site is in operation to ensure that no dust or light material blows off the site. The results of monitoring exercises and any remedial action taken will be entered into the log book which is available for regulatory officers to inspect during operating hours. The name of the site supervisor will be stated in the site's diary / inspection form for each day of operation.

4.2 Monitoring

- 4.2.1 Site staff will continuously monitor dust, noise and litter emissions whilst the site is in operation and will control emissions using the procedures listed above, asking the site supervisor for advice as required.

4.3 Complaints

- 4.3.1 If any dust complaints are received, the relevant operator will complete a 'complaints and events log' and detailed individually on the complaints form (in Appendix II of the site's EMS), both of which will be kept for inspection on request by the local authority and/or NRW. Details of information to be completed are dates, nature of complaint, weather conditions at the time of the complaint, investigation details, action taken and a signature (as a minimum).
- 4.3.2 The operator would also be required to make a note of any unavoidable events such as bad weather in the site diary, rather than just actual complaints received. This will ensure that if complaints are received retrospectively from either the local authority/NRW or directly, any circumstances which led to that complaint as a result of elements outside of the operator's control would be able to be attributed to the cause of the complaint.
- 4.3.3 All noise and vibration complaints will be investigated promptly and appropriate remedial action will be taken if the complaint is validated (e.g. investigate the issue and address as soon as reasonably possible). Complaints will be recorded

on the form the designated complaints form found in Appendix II of the site's EMS. Complaints to the Local Authority / NRW will also be recorded on the same system.

- 4.3.4 An open-door policy will be encouraged by the operator to enable any complaints from neighbouring premises (if received) to be dealt with immediately. The complainant will then be supplied with remedial/corrective actions taken and any procedures or measures put in place by the operator to reduce or ideally eradicate the likelihood of a subsequent complaint.

5 Training for Site Staff

5.1 Training Needs Assessment

- 5.1.1 All new and existing site staff are subject to a specific training regime based on their responsibilities at the site to ensure all operations are carried out without harm to the environment or amenity of the surrounding area. Training in all aspects of the site and waste operations at the site with regard to the individual responsibilities of the site staff will help to prevent incidents occurring which may have an adverse impact on the environment and/or the employees and their co-workers.
- 5.1.2 The training needs assessment shown in Appendix II of the site's EMS provides a comprehensive checklist for the training needs of all new site staff and also serves as a training review for existing site staff which will be carried out every 6 months.
- 5.1.3 The training methods outlined below will detail how site staff will be fully prepared to undertake all mitigation methods and monitoring procedures outlined in this document.

5.2 Recognition of Waste Types

- 5.2.1 All employees will be given induction training and subsequent regular training to identify those waste types which are permitted for acceptance at the site under the site's EP and those wastes which are not. All employees will be advised that they should refer any unrecognisable or unknown wastes to senior management, who should, in turn, follow procedures outlined in the Management System and/or contact NRW to agree a suitable method for removal.
- 5.2.2 This training will be provided to all site users who handle waste on site and those in charge of administration and reporting. In-depth training will also be provided to drivers responsible for collecting wastes from the site of production. They will be trained to identify any wastes not covered by the EP for the site and inform the producer that an alternative facility must be sought for any non-compliant wastes. This will work towards reducing the amount of litter brought to the site.

5.3 Storage Areas / Limits training

- 5.3.1 Those employees who carry out their responsibilities at the site and those in senior posts must be trained to identify appropriate waste storage areas to ensure that waste storage operations comply with the requirements of the EP and Management System for the site. Employees in these roles must also be trained to recognize storage limits.

5.4 Vehicle / Plant Preventative Maintenance Training

- 5.4.1 This training is provided specifically for the vehicle and plant operators in order to ensure that all plant and machinery is checked regularly to prevent any occurrences which may lead to any adverse impacts on the environment or human health.

5.5 Plant Operation Training

- 5.5.1 Any employees who are required to operate loading or treatment plant for the movement or processing of waste will be required to undertake the necessary qualifications for the operation of the specific item of plant in question. This will be required prior to operating the plant and will be obtained through necessary external certification programmes.