Recresco Ltd

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Environmental Management Plan

Cwmbran Glass Recovery Facility
Unit 60
Springvale Industrial Estate
Cwmbran
NP44 5BE

Feb 2022 **Permit No. EPR/DB379TC**

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Introduction

The Cwmbran Depot was first opened in late 2010 for the crushing of manufactured glass cullet produced from recycled glass at other Recresco sites for use by a local furnace as a part infeed in the production of glass fibre insulation.

During 2011 the processes at Cwmbran were extended to include the processing and manufacture of glass cullet to end of waste specifications from both kerb side collected mixed glass and MRF supply, this being within the requirements of a T4 exemption.

The planning status was confirmed by the planning officers of the Planning & Public Protection Service at Torfaen County Borough Council as B2 during September 2013 and that the processes being undertaken were in accordance with this and their Waste Framework.

Over time as the processes and volumes increased it was agreed with National Resource Wales that a bespoke permit should be applied for, this was determined during March 2014.

Recresco gained ISO 14001 accreditation during May 2011 and the processes and operations to ensure compliance with permit were as documented within an integrated management system.

Due to a major restructuring after the review of the processing capabilities, the needs of the business and the supply of glass and end markets the unit went through downsizing and simplified processes were introduced using only higher quality infeed, due to the reduced environmental risks and impacts this resulted in the surrender in late 2017 of the ISO 14001 accreditation and the withdrawal of the integrated management system, the company remained ISO 9001 accredited.

During an audit by NRW during January 2019 it was identified that as a result of the above changes no formal management system was in place although procedures and controls from the previous system were still on the whole being assumed but not within a controlled or documented management system.
The NRW requested such a document by mid May 2019 that met the current needs of the business and was fit for purpose.

During late 2020 it was decided to reapply for the ISO 14001 and the new Health and Safety standard ISAO 45001, the integrated management system incorporating ISO 9001, 14001 and 45001 was awarded in September 21.

A number of significant changes to the processing equipment have been made during 2021 including upgrading the front-end processes including introduction of Bivitec screener and upgraded sorting and separation equipment, resulting in a greater volume of manufactured higher-grade products with improvements in recovery rates from raw waste feed.

Infrastructure improvements include planned repair and maintenance of external and internal concrete surfaces and the introduction of an additional weighbridge linked to the existing weighbridge using a new software system called Winweigh, this has reduced loading and unloading times and reduced the volume of waiting commercial vehicles on the site.

This Management Plan has been prepared to ensure compliance with permitted conditions, continuing reduction in environmental risk and the avoidance and control of any pollution.

1.0 Scope

1.1 Recresco operates in accordance with its Integrated Management System compliant with IS0:9001 2015, ISO:14001 and ISO:45001 as accredited by NQA and issued in September 2021.

1.2 The processes are predominantly associated with the supply of EWC code 15.01.07 and 19.12.05 (glass packaging). The site is also permitted to process 19.12.12 material but currently this grade of material is not being accepted due to the manufacture of Eco Sand in compliance with the WRAP Protocol – Aggregates from inert waste, where 19.12.12 is accepted it is stored and processed separately and not used for the manufacture of Eco Sand. Processing includes mechanical treatments including grading, separating, drying, crushing and optical sorting to facilitate the separation of waste into different components for the purpose of recovery and disposal. This being in accordance with schedule 1, table S1.1 of the permit and description activities D14,D15, R13, R3, R4 and R5.

1.2 All treatment activities will take place within a building on an impermeable surface with a sealed drainage system, a discharge consent from surface water to foul drain is in force with Welsh Water with a requirement for quarterly testing at the final surface water outfall location within the site boundary.

1.3 All incoming waste will be stored within a building or under the external canopy and be processed within a maximum period of four weeks.

1.4 Only wastes consisting of inert material from glass processing may be stored outside of the building, including part processed and final products which have ceased to be waste including recycled glass for remelt in accordance with Regulation (EC) No. 1179/2012 and glass in compliance with the WRAP Quality protocol – Aggregates from inert waste.

1.5 All wastes received are from only pre-approved sources and will not contain;

(i) Solely or mainly dusts, powders or loose fibres
(ii) Sludge or liquid
(iii) Japanese Knotweed
(iv) Contaminated materials or substances which may pollute surface and /or groundwater and land.

1.6 This Management Plan will be subject to continuous review and revision. In all circumstances, revisions will be subject to approval by National Resource Wales (NRW).

2.0 Waste management and control

2.1 Regulatory details

The Cwmbran Depot operates under the following Regulatory controls

2.1.1 Planning permission, reference number 93/P/18544 granted by Torfaen Borough Council on 2nd December 1993 for light industrial, classes B1 and B2.

2.1.2 Waste Regulation, Recresco Ltd was granted an environmental permit by National Resource Wales, reference no. EPR/DB3797TC for operations at Cwmbran on 20th March 2014.

2.1.3 Hazardous waste producer, Recresco Ltd is registered as follows;

(i) CAD 608 – registered 11th April 2018

2.2 Permitted Wastes

2.2.1 Only wastes as per schedule 2 of the permit are accepted;

(i) Waste packaging – including separately collected municipal packaging waste
a) 15.01.06
b) 15.01.04
c) 15.01.07

(ii) Wastes from waste management - including wastes from mechanical treatment
a) 19.12.05
b) 19.12.12

(iii) Municipal wastes (household and similar commercial) – separately collected fractions
a) 20.01.02

2.3 Waste acceptance procedures

2.3.1 Only pre-approved wastes of type and description as listed above are accepted onto site, the company Winweigh data base controls the approved supplier and material data.

2.3.2 The sanctioning and analysis department are responsible for ensuring that the data base is kept fully updated and that all duty of care checks are undertaken on new materials and sources, including;

(i) Supplier has environmental permit or exemption in force for the type of material being delivered
(ii) Haulier has a current waste carrier licence
(iii) Recresco is permitted to accept material (EWC code) on its environmental permit or exemption

2.3.3 An agreed specification will be in force between the parties identifying the main quality parameters including the target percentage of permitted glass, organics and metals

2.3.4 The company reserves the right to sample and test incoming feed materials (QP 8.5/4) and compare results against approved standards, a number of options may be considered;

(i) Accept with commercial concession or consideration
(ii) Rework
(iii) Reject as being unacceptable on the grounds of permit acceptability, environmental risk, operational difficulties or not commercially viable.
  a) When untipped, immediately return to sender on delivery lorry
  b) If tipped, place in quarantine bay and plan for collection by supplier

2.3.5 The company trains employees on the identification, actions and required reporting of hazardous wastes or non-acceptable wastes at delivery or tipping at its operational sites, this is updated via toolbox talks

2.3.6 No hazardous waste is permitted to be accepted on any Recresco site, this may include, but not restricted to;

(i) Animal or human waste
(ii) Medical or hospital waste – bottles (POM), dressings etc, etc
(iii) Drug paraphernalia, including syringes, bottles, etc, etc
(iv) Cathode ray tubes or fluorescent tubing
(v) Excessive domestic batteries (AA and AAA) and specifically Ni-Cd rechargeable or flat disk mercury batteries
(vi) Oil or fuel drums and containers and/or evidence of spilt carbon fuels
(vii) Any material or leachate with obnoxious smell and/or being highly fluorescent or coloured.
(viii) Chemical bottles or containers marked with hazardous warnings, e.g., Explosive, Oxidising, Flammable, Toxic, Carcinogenic, Corrosive, Infectious, harmful to the environment.
(ix) Ammunitions and weaponry
(x) Potential asbestos containing products – solids and fibre boarding

2.3.7 Non-hazardous waste, but not in accordance with permit and/or acceptable for processing, may include but not limited to;

(i) Flat glass
(ii) Clothing
(iii) Excessive plastic, paper and carboard and metals
(iv) Soil, concrete and construction aggregate
(v) High organic content and/or high moisture content
(vi) Excessive dust or odour content

To summarise;

2.3.8 New material sources or materials are in the main subject to trial load, lab testing and monitoring of the operational process for key indicators, e.g., quality and volume of finished streams and volume and type of waste produced.

2.3.9 All deliveries are presented over the weighbridge with a delivery ticket and a waste transfer note – (some suppliers may have an approved annual ticket in place as approved by the

sanctioning and analysis department as an acceptable option to the provision of a waste transfer note for each consignment)

2.3.10 The details on the delivery ticket / waste transfer note are checked and validated against the information held on the Winweigh data base, only if the records fully match with regard to supplier, source, material description, EWC code and haulier can the consignment be accepted onto site.

Where the details do not fully match the depot manager will be notified, who may;

(i) Visually inspect the material as being in compliance with the permit and accept the waste on a trial basis and place in isolation bay until authorisation has been received from the sales team, sanctioning and analysis and arrangements made for a controlled trial.
(ii) Reject the material and return to sender

2.3.11 The loads are directed to the appropriate tipping area as shown on the site plan, all waste streams are stored within a building or under an external canopy on impervious surface with sealed drainage or drainage to foul where a discharge consent is in force.

2.3.12 The shift shovel driver inspects the load during tipping and any loads not meeting the expected quality or consistency or are non-compliant with permit conditions are quarantined and the production manager or site manager notified, this not limited to, but includes any concerns relating to the acceptability of grade as described within European Waste Codes, e.g., 19.12.05.

2.4 Despatch of waste and non-waste products

2.4.1 All products despatched from the operating depot are presented over the weighbridge with details entered onto the Winweigh system and weighbridge tickets and waste transfer notes produced as appropriate.

2.4.2 Finished products are either manufactured in accordance with the WRAP Quality Protocol or Regulation (EC) No. 1179/2012 for glass cullet, materials meeting these standards are deemed to have satisfied the end of waste criteria and are therefore no longer wastes in accordance with the Waste Directive and only weighbridge tickets with conformance statement are issued.

2.4.3 All other waste is designated a waste code in accordance with the standard waste hierarchy with waste transfer note completed with a waste hierarchy statement completed and weighbridge ticket issued, a duty of care is completed, including but not limited to;

(i) The receiving outlet is checked for an appropriate permit or exemption in place and that they can accept the waste stream
(ii) Haulier as appropriate waste carrier license in force

2.4.4 Types of hazardous waste may include;

(i) Waste water or sewerage collection (Cesspit)
(ii) Waste oils, filters or rags
(iii) Used spill kit contents
(iv) Soils further to oil or fuel spillage
(v) Return of rejected and unacceptable feed supply

3.0 Operational controls

3.1 Management Controls

The working controls are designed, implemented and authorised by the company directors to ensure continual identification of and improvements in pollution control and prevention.

3.1.1 The Company has identified and continues to review the environmental hazards associated with its operations including receptors, pathway and the risk management process to control the hazards to acceptable over-all risk level, these are contained within the Environmental Risk Assessment.

3.1.2 All new processes, plant or equipment are assessed for their potential environmental impact including identifying the hazards, risk, receptors and pathways and the implementation of manageable control measures to reduce the risk of pollution or complaint to acceptable level.

3.1.3 The environmental hazards, risks and management controls resultant from a major unplanned incident, e.g., fire or flood are fully documented within the Emergency Plan.

3.1.4 All complaints are recorded on the check proof electronic system and are formally and fully investigated by the site manager with the findings recorded and reported to the complainant and the director responsible, they will also be available to NRW upon request.

3.1.5 In accordance with the terms of the permit NRW will be notified of;

(i) any events, breakdown, or failure of equipment that is likely to have caused an emission of substances causing or possibly causing significant pollution.

(ii) Quarterly waste movements via electronic system

3.1.6 Should the site be unable to process due to breakdown or similar event for any prolonged period of time; inbound materials will be re-directed to another operating depot and arrangements made for the removal of all waste streams from site.

3.1.7 The company operates an electronic data recording and storage system (check proof) operated at site level via hand held tablet or similar with the findings from visual inspections at required frequency recoded for the management and control of required actions.

Items checked include;

- Security of boundary
- Working within permit boundary

- Condition of external haul roads – dust and debris
- Visual inspection of stockpiles, quality, acceptable material, volume and temperature where required
- Segregation and control of waste and non-waste streams
- Safety or environmental hazards or non-controlled risks
- Storage of waste oils, filters, diesel tank, engine and hydraulic oils
- Cleanliness of working areas and control of spillage and debris
- Identification of and the control of vermin and pests
- Drainage channels and drains
- Impervious internal and external floor surface condition
- Stack emissions – colour, strength, smell, volume
- Firefighting equipment and spill kits
- Fugitive emissions
  - (i) Dust
  - (ii) Odour
  - (iii) Noise and vibration
  - (iv) Water
- Condition of fixed and mobile processing plant and equipment
- VOR or plant isolation status
- Operation of weighbridge and control of tickets and waste transfer notes

3.1.8 The company undertakes a yearly review if its management system to assess the effectiveness of the controls in reducing and controlling pollution risks and that it meets the needs of the business

3.2 Designated working areas

3.2.1 All storage of waste, part processed streams and the manufacture of glass cullet for remelt or aggregate is undertaken within a building or under external canopy on impervious surface within a sealed drainage system or to foul drainage where a discharge consent is in force.

3.2.2 All working processes and working areas are designed and controlled to ensure that there are no single point source emissions to air, water or land and that any fugitive emissions do not cause pollution.

3.2.3 All liquids, whose emissions to water or land could cause pollution are provided with secondary containment, whether this be by external bunding to tanks, containment tanks or double skinned tanks.

3.2.4 Storage of all wastes and products are clearly demarcated within concrete bays, signed and shown on the site working plan.

3.2.5 The working areas are kept clean of debris with stocking levels and material segregation of both waste streams and product monitored

3.2.6 Stockpile visual condition and temperatures are monitored on susceptible combustible products liable to spontaneous ignition.

3.2.7 All processing plant is located within designated areas, where possible these are designated and protected vehicle free zones with plant in-feed and mobile plant movements outside of the pedestrian zone.

3.2.8 All plant and equipment is maintained and serviced in accordance with manufacturers recommendations

3.2.9 Designated and signed transport and pedestrian routes are provided to storage and processing areas

3.2.10 The working and storage areas are visually checked on a daily basis during each working shift for any environmental or safety compliance concerns and uncontrolled hazards or risks with the findings recorded on check proof.

3.3 Dust mitigation and controls

3.3.1 The fugitive emissions management plan has been withdrawn and replaced with the following identified risk management controls which are deemed fit for purpose for the size and scope of current operations, by;

(i) Ensuring work operations and control of waste and products are compliant with this management plan

(ii) Daily assessment of risk of dusts in the external atmosphere by competent person assessing;

a) Quantity of debris on external surfaces
b) Particulates / emissions from exhaust stacks
c) Weather conditions
d) Traffic movements
e) Is it likely to cause offence
f) Prevailing wind directions
g) Closeness of nearest neighbour or effected persons
h) Time of year and likely impact due to weather conditions, day of the week and time of day

Any dusts requiring corrective actions will be recorded on check proof.

3.3.2 Should dusts likely to cause risk of offence or complaint are identified the root cause will be established and control measures implemented immediately following industry recognised Plan, do, check, act philosophy.

3.3.3 Processing of products which may potentially generate excessive dust fines into the atmosphere, namely drying and crushing operations are controlled by local exhaust extraction systems with the larger fines collected in filter boxes and the smaller fines extracted via exhaust filter prior to atmosphere by chimney stack.

3.3.4 External haul roads are kept free of debris, where detritus has collected or during dry periods by mechanical sweepers will be provided at frequency as determined by the site manager

3.3.5 There are no emission limits or required monitoring associated directly with permit condition, stack emissions are checked annually as part of our safety and environmental duty of care not to cause risk or pollute.

3.3.6 Annual dust monitoring of the working areas and personal dust exposure (dosimetry) is undertaken by specialist external providers.

3.4 Odour

3.4.1 All waste streams must be stored and processed within a building or under the external canopy, light weight waste streams are removed from site at regular frequency to mitigate and reduce the risks of odour, pests and fire.

3.4.2 At the application of permit stage the EA requested an in-depth odour management plan due to complaints raised, the types of materials being stored and processed including some historical external stockpiles of waste and an external crushing programme that was agreed under a short-term emergency dispensation.

The processing operations have been simplified and are of lower environmental impact or risk due to;

(i) Incoming feed restricted to EWC coding 15.01.07, 19.12.05 and 20.01.02, MRF of grade 19.12.12 high in organics and lightweight paper and plastic has been stopped due to operational, quality and commercial considerations.

(ii) All processing is now within building or external canopy

(iii) Light weight waste streams are removed from site at regular frequency

(iv) Crushed glass grit stored outside (End of waste – WRAP protocol) is of higher quality, contains less organic, is removed from site at regular frequency and therefore presents less of an odour risk.

(v) Loads of in-feed supply are only being accepted when there is adequate storage space and processing resource and capability.

(vi) No odour complaints received for the last two years

3.4.3 The odour management plan has been withdrawn and replaced with the following identified risk management controls which are deemed fit for purpose for the size and scope of current operations, by;

(iii) Ensuring work operations and control of waste and products are compliant with this management plan

(iv) Daily assessment of odour risk by monitoring odours (sniff test) by competent person assessing;

(i) Odour strength and duration
(ii) Is it likely to cause offence
(iii) Prevailing wind directions

(iv) Closeness of nearest neighbour or effected persons
(v) Time of year and likely impact due to weather conditions, day of the week and time of day

Any odours requiring actions will be recorded on check proof.

3.4.5 Should odours likely to cause risk of offence or complaint are identified the root cause will be established and control measures implemented immediately following industry recognised Plan, do, check, act philosophy.

3.4.6 The depot has short term immediate call off (hire) resourced from local supplier of odour suppression units should odour mitigation be required whilst permanent solution is identified and implemented.

3.5 Surface Water

Two types of ground water run-off are considered;

(i) Minor leak / spillage of diesel and oils during storage, delivery and use
(ii) Run off from external surfaces and out of buildings including entrained particulates

3.5.1 – Spillage of diesel and oils

(i) Fuel transfer is only undertaken with a qualified person in attendance all of the time
(ii) All fuel storage tanks will be double skinned or be fully bunded.
(iii) Fuel storage tanks will be protected from mobile plant and vehicles by Armco barrier
(iv) Drip trays will be provided for minor spillage
(v) Smaller quantity of oils will be stored on bunded pallets with 120% capacity of largest container
(vi) Spill kits are provided in key areas of the site with adequate number of trained employees
(vii) Plant or equipment leaking fuel or oils will be immediately stopped and reported and placed under VOR or plant isolation status, reported on check proof and not operated until repair commissioned and completed
(viii) Used spill kits, absorbents, fuel filters and waste oils are stored in appropriate containers for collection and disposal by approved haulier to registered and approved facility.

3.5.2 – Run off from external surfaces

(i) All external areas of delivery or storage of materials are on impervious concrete surface with run off to sealed surface drainage to foul sewer outside the boundaries of the site.
(ii) All processing is undertaken within the main buildings or under the external canopy on impervious concrete surface with run off to sealed surface drainage to foul sewer outside the boundaries of the site.
(iii) Concrete surface finish and drainage channels are inspected as part of the site inspections with the findings reported on check proof.

3.5.3 Cwmbran depot has a discharge consent issued by Welsh water due to the water run-off from the use of dust suppression units during dry periods where there is a risk of excessive dust being created to atmosphere from the stored finished products.

(i) Water sampling is undertaken every three months or when an environmental pollution incident may be suspected, samples are taken from the discharge point at the last SW manhole on the run adjacent to the weighbridge side of the building before the shared access road.

Health and safety risks must be assessed with appropriate control measures, barriers and traffic control around the open manhole whilst sampling is being undertaken.

(ii) Samples are to be taken from the moving flow of water and collected in sterile plastic bottles, these must be stored in the fridge and collected or delivered to a UKAS accredited test house within 24 hours.

Testing scope to include;

a) BOD and COD
b) Testing of leachate / water for
- Anions and metals
- pH and conductivity
- Speciated petroleum hydrocarbons
- Volatile organic compounds

(iii) Results should be analysed for trends and compliance, filed on site with copy sent to Welsh Water.

3.6 Noise and vibration

3.6.1 From the environmental risk assessment the impact of vibration to land is not considered to be significant due to the type of processing being undertaken but the following risk management controls have been implemented to reduce the risk of noise to local residents and the local nature reserve at 40m and 75m respectively from the site boundary.

(i) All processing works are undertaken within the main buildings and where possible between 1800 hrs and 0700 hrs the external doors are closed and the movement of mobile plant around the site or stocking of materials in external bays is minimised.

(ii) Working under the external canopy, e.g., crushing operations, is only permitted between the hours of 0700 and 1800 hrs.

(iii) Delivery and collection vehicles and their loading and unloading is restricted to between the hours of 0700 hrs to 1700 hrs with the last vehicle permitted entry onto site at 1630 hrs.

3.6.2 All plant and machinery are serviced and maintained in accordance with manufactures recommendations and all mobile plant is fitted with white noise reversing bleepers.

3.6.3 Yearly personal noise dosimetry is undertaken by external experts and includes fixed point background levels, a number of locations being adjacent to the site boundary.

3.6.4 The noise and vibration of any new processes and plant or equipment are assessed for their environmental impact

3.7 Control of pests

3.7.1 The company employs the service of an accredited external pest controller and has a contract in place for the monitoring and control of pests by designated poisons

3.7.2 The monitoring of pests is also undertaken during the site inspections and if infestation of flies or an increasing number of rodents is suspected the root cause is investigated, remedial actions taken, and the pest controllers contacted for additional visit and control.

3.7.3 As a matter of routine the stocks of waste streams are managed to avoid the build-up of stocks in volume or time duration on site either prior to processing or removal from site.

4.0 Management control

4.1 Management structure and responsibilities

4.1.1 The company operates within a management structure;

(i) Directors and shareholders

a) Ensuring that there is suitable and adequate resource available in order to satisfy the requirements of this management plan and comply with the terms of the permit and environmental legislation

b) Ensuring that only the working activities as described in Table S1.1 are permitted to be undertaken and the maximum tonnage of waste accepted per annum does not exceed 220,000 tonnes.

These to include

- Grading and separating
- Air drying and crushing
- Density separation and optical sorting
- Mechanical separation of waste by constituents to aid recovery and disposal

(ii) Senior Managers, shall ensure that;

a) The requirements of this management policy are fully complied with by both employees and contractors working on the site

b) That directors, shareholders and the senior company COTC holder are kept fully updated of any incidents that may give rise to an environmental risk or potential polluting incident.

c) Improvements or reduction in environmental risks or potentially polluting incidents are communicated with directors, employees and contractors

(iii) Employees shall be;

a) Aware of and understand their duties and responsibilities

b) Competent to undertake their assigned tasks

c) Aware of the environmental and potential pollution risks and controls within their working areas

4.2 Training

4.2.1 The company identifies the training requirements of its employees and provides suitable resources to ensure that the required skills, knowledge and expertise are maintained to;

a) Comply with the requirements of this management plan

b) Ensure that the tasks and responsibilities of their posts are carried out competently

c) Have a general knowledge and awareness of environmental hazards, risks and controls in their working areas

4.2.2 Senior managers identify the training requirements of each post and keep a training log of all employees whose actions may have an impact on the environment

4.2.3 The weighbridge operator, production manager and shovel drivers will be specifically trained in the procedures associated with the identification, acceptance and rejection of waste.

4.3 Technical Competence

4.3.1 The Company has appointed two technically competent persons who are holders of the Certificate of Technical Competence (COTC) as awarded by WAMITAB, the six-unit module has been deemed suitable for the environmental risks associated with the operating plants and processing materials.

4.3.2 Where the above appointees have any concerns with regard to Environmental Compliance or Environmental risk they can revert to the Company Senior COTC holder for advice and guidance.

5.0 Site inspection and audit

5.1 Site inspections

5.1.1 Inspections will be undertaken by competent persons at the following frequencies

(i) Local site COTC holder – weekly

(ii) Internal processing area walkaround by production manager – daily

(iii) External storage of materials, fuels, fugitive emissions, spillage, litter and site boundaries by depot manager - daily

5.1.2 The full scope of the inspections are as identified on the check proof electronic system

5.1.2 Any incidents or issues requiring action will be agreed with the local COTC holder and the depot manager and recorded on check proof for action and clearance by the depot manager.

5.1.3 Where the actions required cannot be agreed at local level the Senior COTC holder will be contacted for advice and guidance and referral to directors.

5.1.4 The depot manager will immediately notify the Senior company COTC holder and directors of any issue or event which constitutes a breach of permit, environmental legislation or gives rise to a significant risk of pollution and will instruct cessation of works until remedial works have been agreed and the causation of the breach resolved.

5.2 Audits

5.2.1 Depot company COTC holder – monthly

The audit schedule and findings are recorded on "The depot site inspection report" form with copy to the depot manager and directors.

5.2.2 The Depot COTC holder will;

(i) Agree corrective actions and time line with the depot manager and monitor the progress of clearance of items raised and will notify the directors when agreed targeted completion dates have lapsed.

(ii) Immediately notify the directors and senior COTC holder of any issue or event which constitutes a breach of permit, environmental legislation or gives rise to a significant risk of pollution and will instruct cessation of works until remedial works have been agreed and the causation of the breach resolved.

(iii) Undertake full investigation and issue report with recommendations into any breach identified in 5.1.4 and 5.2.2 above after establishing the root cause and ensuring that corrective actions have been implemented to correct the causation of breach and avoid reoccurrence.

5.2.3 An annual audit for compliance with permit conditions and environmental legislation will be undertaken by external auditor with preparation of report to directors as part of the evidence presented for the company annual management review meeting.

6.0 Environmental accidents and incidents

6.1 Investigation and reporting

6.1.1 The production manager shall ensure that;

(i) All employees and sub-contractors are made aware that all accidents and incidents resulting from an environmental event or a potential environmental pollution near miss should be reported whether an injury or damage to property has occurred, this being a requirement of the environmental permit.

(ii) All internal accident and incident forms are fully completed and that the depot manager, COTC holders and directors are notified.

6.1.2 The Depot Manager will be responsible for any formal notification to the Environment Agency as required by the permit.

6.2 Corrective actions

6.2.1 The Company Directors will nominate suitably qualified, experienced and technically competent persons to be responsible for fully investigating any significant environmental accident or incident, reporting findings and agreeing corrective actions and time frames as required to the directors

(i) Suitable and sufficient corrective actions to include but not restricted to;

(a) Budget and scope of work
(b) New training requirements
(c) Revised plant and equipment
(d) Change in provision of PPE type
(e) Revised process, manufacture, controls and work instructions
(f) Amendment of policies, procedures and tool box talks
(g) Persons responsible
(h) Time frames
(i) Staff retraining, change in role, disciplinary investigation, etc., etc.

6.2.1 The production manager shall ensure that the findings and recommendations of any investigation are

(i) discussed with the employees involved and that any changes in working practice are fully communicated with additional training given as required, and

(ii) That changes are monitored with the effectiveness of any changes reviewed, and

(iii) Directors and COTC holders are kept notified of progress and findings

Appendix A – Cwmbran Glass Recovery Facility Site plan