



Fenestration Recycling Company Ltd
ENVIRONMENTAL PERMIT VARIATION

Controlled Document No.	
Issue	v1.0
Date:	29/02/16

SD3c - Management Systems
Environmental Management System Plan

Environmental Permit
PERMIT NUMBER EPR/HP3938RN/T001

Fenestration Recycling Company Ltd
(t/a The National Window Recycling Company)
Neath Abbey Wharf
Neath Abbey
Neath Port Talbot
SA10 6BL

Document Revision

Version	Date	Author	Checked / App'd	Revision
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Fenestration Recycling Company Ltd
ENVIRONMENTAL MANAGEMENT SYSTEM

Environmental Management System Plan

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MPP3 Environmental Management System Plan

HCI Waste Transfer Station with Treatment

PERMIT NUMBER EPR/HP3938RN/T001

Fenestration Recycling Company Ltd
(t/a The National Window Recycling Company)
Neath Abbey Wharf
Neath Abbey
Neath Port Talbot
SA10 6BL

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**Fenestration Recycling Company Ltd
ENVIRONMENTAL MANAGEMENT SYSTEM**

Environmental Management System Plan

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1 INTRODUCTION

1.1 Purpose of this Document

This Management System Plan has been prepared by Fenestration Recycling Company 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 Fenestration Recycling Company Ltd (t/a The National Window Recycling Company), Neath Abbey Wharf, Neath Abbey, SA10 6BL.

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a 'live' document and as such has been presented in a way which can be easily amended by adding to, or removing superseded information.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 **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 for a normal variation (to permit EPR/HP3938RN/T001) to add physical treatment of waste to the activities undertaken, to increase the area of the permitted site, to add EWC codes to the list of accepted wastes for wastes similar to those already permitted onsite and to increase the limits for storing waste on-site. A request to consolidate the permit to a modern permit template and conditions has also been requested. This EMS in parts (notably in section 1.3) assumes that this consolidation will occur.

Although the site is permitted to accept a range of Commercial and Industrial and Construction and Demolition wastes, at present the site only accepts and treats uPVC window and door frames (and similar materials). Moving forward the company intends to expand the range of rigid plastics that it accepts and processes for recovery. This EMS Plan does not consider the storage and treatment of wastes other than waste plastics and should the operator wish to accept wastes other than those best described as plastics, this EMS Plan will be updated to reflect the storage and treatment required for these materials and any changes agreed with Natural Resources Wales prior to these wastes being accepted on-site.

The permitted operations may be observed as:

- Receipt, inspection and unloading of waste from transporter vehicles and transfer to storage using on-site plant;

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- Manual sorting and segregation;
- Cutting and crushing (hammer milling and granulation) of waste to reduce its size;
- Screening and automated sorting of waste to separate different fractions;
- Bagging, baling or bulking of waste to facilitate transport;
- Loading and transfer of bagged, baled or loose metals onto articulated or hooklift vehicles for dispatch to recycling facilities for recovery; and
- Loading and transfer of small volumes of residual waste onto hooklift vehicles for dispatch to recycling facilities for recovery or disposal.

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.

New Format Permit 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
1.2.1	Waste hierarchy	(a) and (b) Environmental Policy and EMS Plan 4.2.1 (c) EMS Plan 4.2.1
1.2.2	Review	EMS Plan 1.4
2.1.1	Permitted activities	EMS Plan 5.2 Compliance Audits (Internal/External)
2.2.1	Site Boundary	Drawing 10937-000-A in MPP7 Daily site inspections Compliance Audits (Internal/External)
2.3.1	Operating techniques	All relevant sections from Sector Guidance Note IPPC S5.06: Guidance for the Recovery and Disposal of Hazardous and Non Hazardous Waste ¹ EMS Plan sections 5.4
2.3.2	Waste acceptance	EMS Plan 1.1 EMS Plan 8.3 Procedure PR7
2.4.1	Technical Requirements	EMS Plan 5.6

¹ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/298118/LIT_8199_dd704c.pdf

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3.1.1/3.1.2	Emissions	EMS Plan 9.1.2
3.1.3	Containment	EMS Plan 7.1/9.1.2.3
3.2.1/3.2.2	Odour	EMS Plan 9.1.2.10
3.3.1/3.3.2	Noise and Vibration	EMS Plan 9.1.2.1
3.4.1/3.4.2	Pests	EMS Plan 9.1.2.9
4.1	Record keeping	EMS Plan 10
4.2.1/4.2.2	Reporting	EMS Plan 9.3
4.3.1/4.3.2	Notifications	EMS Plan 9.3.2
4.3.3	Monitoring or sampling	EMS Plan 9.1.1.2
4.3.4/4.3.5	Other matters	EMS Plan 9.3.2
4.4	Interpretation	EMS Plan 9.3.3

Table 1. Requirements of Permit (* paragraph numbers subject to confirmation when permit issued)

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 considered when preparing 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
- 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
- Sector Guidance Note IPPC S5.06: Guidance for the Recovery and Disposal of Hazardous and Non Hazardous Waste
- Horizontal Guidance Note H1 Environmental Risk Assessments for Permits - Overview Document, v2.1 December 2011 and Annexes A to K



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- 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
- Getting The Basics Right – How to comply with your environmental permit, June 2013
- Environmental Management Toolkit - General Version for Waste Handling Industry, Environment Agency



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2 PERMIT DETAILS AND CONTACTS

2.1 Environmental Permit Number

EPR/HB3938RN/T001

2.2 Site Operator

The site Operator is:

Fenestration Recycling Company Ltd

Neath Abbey Wharf

Neath Abbey

SA10 6BL

Tel.: 01792 814286

Email: enquiries@tnwrc.co.uk

2.3 Site Contacts

Company Director: Mr. Stephen Hemmings

Mobile: 07966 638894

Email: stephenjhemmings@gmail.com

Technically Competent Person: Julian Dunn (WAMITAB Training in Progress)

Mobile: 07496 830489

Email: juliandunn.fenestration@gmail.com

Site Manager: Mr. Julian Dunn

Mobile: 07496 830489

Email: juliandunn.fenestration@gmail.com

Site Supervisor: Mr. Kyle Fulcher

Mobile: 07772 378252

Landowner: The Steel Supply Co. (Southern) Ltd

Address: 10 St. James Crescent, Uplands, Swansea, SA1 6DZ

Contact: Arfon Jones/Simon Jones

Mobile: xxxxxxxxxxxx

Email: arfon@scco.co.uk

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3 SITE DETAILS

3.1 Site Location

The facility is located in the approximate centre of industrial development at Neath Abbey Wharf, approximately 2.5km west of Neath town centre (OS Grid Reference SS 72767 96345). The location of the site is shown on Drawing 10937-000-A in [MPP7](#).

3.2 Site Access

Access to the site is via a private asphalt surfaced road (maintained by the landlord), which connects via an unnamed road with the A465 Heads of the Valleys Road at the Neath Abbey Business Park approximately 700m north east of junction 43 of the M4.

3.3 Site Ownership

The site has been secured by Fenestration Recycling Ltd on the basis of a Nine (9) year lease taken out in September 2011 with the freehold owners, The Steel Supply Co. (Southern) Ltd.

3.4 Site Layout

The permitted area is shown in Drawing 10937-000-B in [MPP7](#).

The site occupies an area of ~0.7 hectares (~1.7 acres) and comprises two open yard areas separated by a railway embankment. The rectangular northern part of the site has an approximate area of 0.41ha and the southern roughly triangular area, 0.29ha. The site is bounded on the western side by a railway embankment and to the east by the Tennant Canal. A block plan for the site is shown in Drawing 10937-000-C in [MPP7](#). The layout (describing the site in an approximate north east to south west direction) comprises the following primary areas:

- Northern Area
 - The site entrance with separate access for HGV and staff/visitor vehicles;
 - A weighbridge, weighbridge office, administrative offices and staff welfare facility (including kitchen and toilet facilities), staff and visitor parking;
 - A processing area with buildings/enclosures containing fixed plant (hammer mill, metal sorting);
 - Areas for reception, inspection and storage of accepted wastes awaiting processing;
 - Areas for manual sorting, segregation, screening and storage of sorted wastes;
 - Areas for storage of non-hazardous residual waste;
 - Designated storage areas for plant and vehicles; and
 - An area for the storage of quarantined wastes.
- Southern Area:
 - External storage areas for recyclates awaiting dispatch;
 - Areas for storage of non-hazardous residual waste;
 - A building for processing (granulation and automated sorting) of wastes;
 - A temporary/mobile office building; and
 - A bunded storage area for fuels and caged storage of gas.

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3.5 Sensitive Receptors

The site is located west of Neath town centre in an area that has been developed extensively for wharf-side commercial and industrial use. Industrial or commercial premises. Aggregate Processing and a Waste Transfer Station represent the site’s immediate neighbours (separated by the Tennant Canal).

The nearest residential housing is situated in Pen-yr-Heol approximately 145m north west of the site.

Other sensitive receptors within 1 km of the site include the Tennant Canal and River Neath Estuary, as well as residential properties in the Pen-yr-Heol and Pentrefynnon areas to the south of Skewen. There are no designated sites (SSSI, SAC, RAMSAR, etc.) within 1km of the site.

A Receptor Plan highlighting human and ecological receptors within the vicinity of the site is presented as Drawing 10937-000-F.

3.6 Flood Risk

According to NRW’s Flood Risk map the site does not lie within an area at risk of flooding from rivers or sea (Table 2). Parts of the site, predominantly located in the northern area are identified as having a medium to low risk of flooding from surface water (Table 3). Areas used for storage and processing of waste are assessed as having a low risk, with the medium risk area being located to the south of the car parking area.

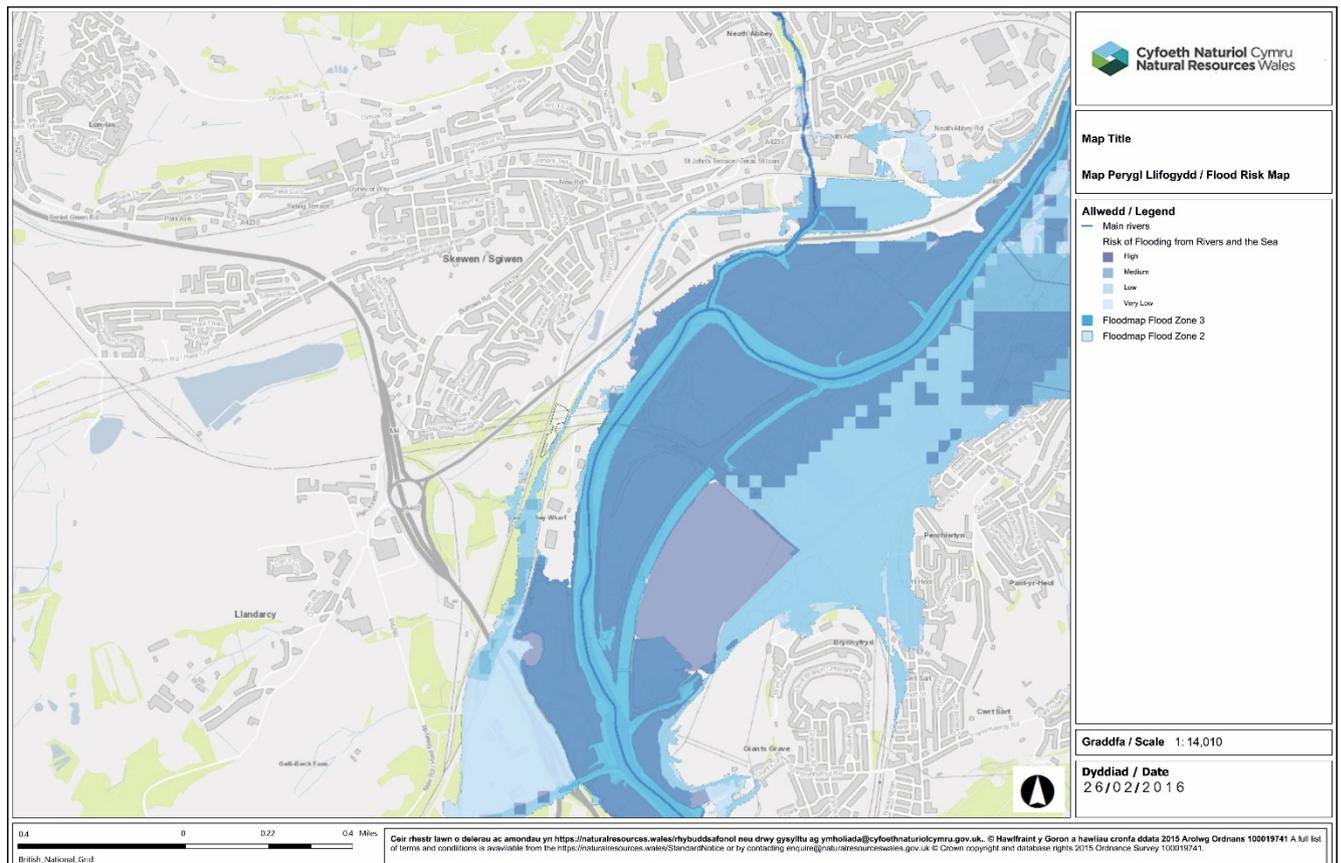
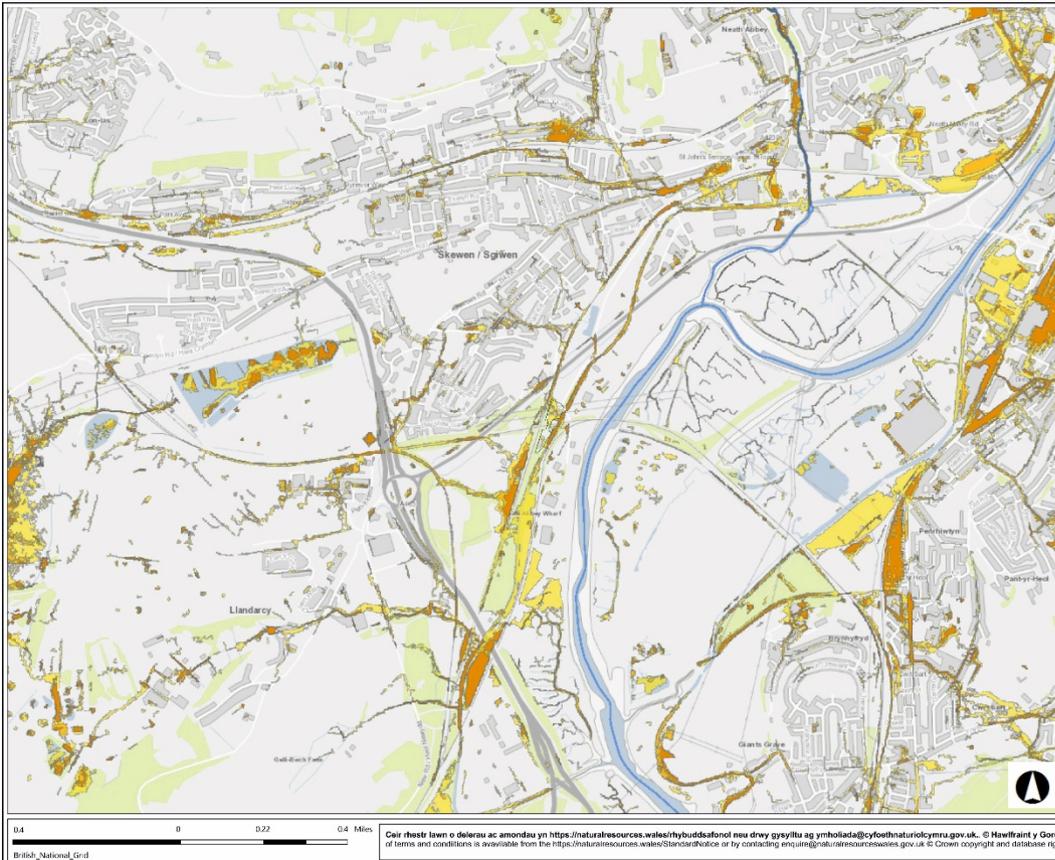


Table 2. Flood Risk Zones (Coastal and Fluvial). The site boundary is outlined in green.

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Map Title
Map Perygl Llifogydd / Flood Risk Map

Allwedd / Legend
 — Main rivers
 ■ Risk of flooding from surface water - High
 ■ Risk of flooding from surface water - Medium
 ■ Risk of flooding from surface water - Low

Graddfa / Scale 1:14,010

Dyddiad / Date
26/02/2016

Table 3. Flood Risk Zones (Surface Water). The site boundary is outlined in green.

3.7 Groundwater

The site is not located in a Source Protection Zone.

The EA's Groundwater Vulnerability Zone map designation for the site is Minor Aquifer High.

The bedrock designation is Secondary A Aquifer, and the superficial layer designation is Secondary Undifferentiated across the east of the site and Unproductive Strata to the west.

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4 MANAGEMENT

4.1 General Management

4.1.1 Site Operations

The site shall be operated in accordance with the EMS (of which this Environmental Management System Plan (EMSP) is part).

4.1.2 Site Personnel

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

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.

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

4.1.3 Access to Permit

All site staff are made aware of the EP and EMS, and any person with duties that are controlled by the permit will have convenient access to a copy of it. This includes not only staff but any contractors that may be working on the site as well. 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.

The Weighbridge Office will keep a copy of the Environmental Permit and the most up-to-date approved copy of the Environmental Management System. The copy may be in paper form and/or electronically available.

4.1.4 Technically Competent Person

The company will employ and train at least one Technically Competent Person.

Due to the previous Technically Competent Manager leaving the business the site does not currently have a WAMITAB qualified person to comply with permit requirements. Mr. Julian Dunn, the recently appointed Site Manager is currently studying for a WAMITAB Level 4 qualification.

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.

4.1.5 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.

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- 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 Solutions 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.

4.1.6 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.

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.

4.2 Avoidance, Recovery and Disposal of Wastes Produced by the Activities

4.2.1 Waste Hierarchy

The Waste Hierarchy (as defined in Article 4 of the Waste Framework Directive) will be applied to the generation of waste by the activities and any waste generated will be treated in accordance with the Waste Hierarchy. Where disposal is necessary this will be undertaken in a manner that minimises any impact on the environment. To this end, energy recovery should be used before landfill wherever possible.

4.2.2 Review

Reviews of measures taken to comply with the Waste Hierarchy will be reviewed at least every 4 years. The Site Manager will be responsible to scheduling the review and ensuring relevant staff and advisors are in attendance. Any further appropriate measures identified should be carried out to agreed timescales.

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5 OPERATIONS

5.1 Current Site Usage

Although the site is permitted to accept a range of HCI wastes, at present the site has been developed as a plastic recycling facility, with site operations being designed for the purposes of recycling all plastic delivered into the facility by licensed waste carriers.

The site currently only accepts and treats uPVC window and door frames (and similar materials), however moving forward, the company intends to expand the range of rigid plastics that it accepts and processes for recovery. This EMS Plan does not consider the storage and treatment of wastes other than waste plastics and should the operator wish to accept wastes other than those best described as plastics, this EMS Plan will be updated to reflect the storage and treatment required for these materials and any changes agreed with Natural Resources Wales prior to these wastes being accepted on-site.

5.2 Permitted Activities

The site is only authorised to carry out the activities specified in Table 4.

Description of Activities	Limits of Activities
R3 Recycling/reclamation of organic substances which are not used as solvents (including composting and other biological transformation processes)	Treatment consisting only of manual and automated sorting, separation, screening, baling, shredding, crushing, compaction, physical mixing or bulking of waste into different components for disposal (no more than 50 tonnes per day) or recovery.
R4 Recycling/reclamation of metals and metal compounds	
R5: Recycling/reclamation of other inorganic compounds	Waste types as specified in Table 6.
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)	
D9: Physico-chemical treatment not specified elsewhere in Annex IIA which results in final compounds or mixtures which are discarded by means of any of the operations numbered D1 to D12	
D14: Repackaging prior to submission to any of the operations numbered D1 to D13	
D15: Storage pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where it is produced)	
Update to reflect Table S1.1 of the issued permit	

Table 4. Authorised activities.

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.

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5.3 The Site

The activities detailed in Table 4 are only to be undertaken within the boundary of the site as shown in Drawing 10937-000-A in [MPP7](#).

5.4 Operating techniques

The activities shall be operated in accordance with the documentation specified in Table 5 unless otherwise agreed in writing with Natural Resources Wales.

Description	Parts	Document Ref.
Sector Guidance Note IPPC S5.06: Guidance for the Recovery and Disposal of Hazardous and Non Hazardous Waste	All relevant sections	
Update to reflect Table S1.2 of the issued permit		

Table 5 Operating techniques.

If notified by Natural Resources Wales that any activities are giving rise to pollution, the company submit to Natural Resources Wales for approval within the period specified, a revision of any plan or other documentation specified in Table 5 or otherwise required under the permit which identifies and minimises the risks of pollution relevant to that plan , and will implement the approved revised plan in place of the original from the date of approval, unless otherwise agreed in writing by Natural Resources Wales.

Waste shall only be accepted at the facility if it is listed in Table 6. (NOTE: Any waste whose six digit code is marked with an asterisk (*) is a hazardous waste).

Waste will only be accepted if it conforms to the description in the documentation supplied by the producer and holder.

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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.

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 01	paper and cardboard packaging
15 01 02	plastic packaging
15 01 03	wooden packaging
15 01 04	metallic packaging
15 01 07	glass packaging
17	CONSTRUCTION AND DEMOLITION WASTES (INCLUDING EXCAVATED SOIL FROM CONTAMINATED SITES)
17 01	concrete, bricks, tiles and ceramics
17 01 01	concrete
17 01 02	bricks
17 01 03	tiles and ceramics
17 01 07	mixtures of concrete, bricks, tiles and ceramics other than those mentioned in 17 01 06
17 02	wood, glass and plastic
17 02 01	wood
17 02 02	glass
17 02 03	plastic
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 12	wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified
19 12 01	paper and cardboard
19 12 02	ferrous metal
19 12 03	non-ferrous metal
19 12 04	plastic and rubber

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19 12 05	glass
19 12 07	wood
19 12 09	minerals (e.g. sand, stones)
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 01	paper and cardboard
20 01 02	glass
20 01 38	wood
20 01 39	plastics
20 01 40	metals
Update to reflect Table S2.1 of the issued permit	

Table 6. Permitted waste types and quantities.

5.5 Discharges from Site

Point source emissions into surface waters or groundwater are not permitted except:

- clean, rainfall dependant drainage from areas of the site not used in connection with the storage and/or treatment of waste, and
- integral discharge(s) from the permitted activity (outside areas of the site used in connection with the storage and/or treatment of waste) in accordance with any limits set out in Table 4.

5.6 Technical Requirements

None.

5.7 Site Capacity

The total quantity of waste that can be accepted at the site must be less than 24,999 tonnes per annum.

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6 SITE INFRASTRUCTURE

6.1 Site Entrance

An identification sign is erected and maintained in a prominent position at the site entrance. The sign is approximately 2m high by 1m wide and displays the following information.

- Site name and address
- Name of site operator
- EP number
- Emergency contact telephone numbers
- Natural Resources Wales contact details
- Operational site hours
- Site rules

6.2 Site Accommodation

The site is equipped with the following facilities:

- Weighbridge Office
- Administrative Offices
- Welfare/Mess facilities

The Weighbridge Office is positioned adjacent to the main entrance and is equipped with a telephone line, suitable for emergency calls. The Weighbridge Office provides suitable space to permit secure short-term record keeping. All records specifically relating to recycling operations are retained on-site.

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.

6.3 Plant and Equipment

The following plant and equipment is used within the site:

- Hammer Mill and associated conveyors.
- 2 x granulators
- Electrostatic sorter
- Colour sorter
- Mobile shredder
- Trommel and picking line (hired in when required)
- 2 x gas Forklift(s)
- 1 x JCB telehandler
- 360 Excavators
- Hand tools including oxyacetylene cutting equipment.
- Fuel 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](#).

6.4 Lighting

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

Site lighting in the northern area is via 7 masts, situated at the site offices (x2), shredder/mill building (x3) and incoming waste delivery bay (x2). The mast heights are approximately 6m and each comprises of a series of halogen quartz floodlights which cover the main working areas of the site

6.5 Site Security

6.5.1 Boundary Treatments

The whole permitted site is within an enclosed site bounded by a combination of 2.4m high steel palisade and strained chain-link security fencing topped with barbed wire. Any breaks in the fencing are repaired on the same day to ensure security.

Access into the site is via two steel palisade gates approximately 2.4m high. Gates are secured with a cross bolt lever and a security padlock.

Planted bunds (in combination with elevated railway embankments and retaining walls) provide both visual screening, surface water containment and restrict access into the site.

All site equipment and machinery are 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 processing building.

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.

6.5.2 Manned Security

Outside of operating hours the site is monitored by remote manned security personnel with CCTV cameras recording activity at a number of locations around the site.

An intruder alarm system has been installed and is monitored by Nitelite Security.

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

6.6 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



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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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7 SITE ENGINEERING FOR POLLUTION PREVENTION AND CONTROL

In general waste management activities at the site relate to the receipt, storage, size reduction, separation, bagging/bulking and dispatch of plastic wastes for recycling at licensed waste management facilities.

7.1 Overview of Site

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

Drawing 10937-000-D in **MPP7** shows a surfacing plan of the site.

Waste treatment and storage activities are undertaken as follows:

Description of Activities	Surface
Receipt, inspection and storage of source-segregated or pre-sorted plastic wastes.	Outdoors on impermeable surface. Drainage by infiltration. (Northern part of site)
Treatment of wastes	Manual sorting, segregation, screening, shredding – Outdoors on impermeable surface. Drainage by infiltration. (Northern part of site) Other treatment (automated sorting, crushing, bagging, etc.) – In-buildings/enclosed processing areas on impermeable surface with internal containment. (Southern part of site)
Storage of processed plastic, metal, rubber, etc. wastes.	Outdoors on impermeable surface with sealed drainage to combined (foul and surface water) sewer. (Southern part of site)
Storage of quarantined wastes.	Outdoors on impermeable surface. Drainage by infiltration. (Northern part of site)
Storage of liquids	Outdoors in bunded containers. (Southern part of site)

7.2 Yard Areas

7.2.1 Surfacing Design and Construction

The yard area to the north is surfaced as follows:

- 200mm thick asphalt on crushed stone (75mm to dust) laid to a minimum depth of 200mm.

The yard area to the south is surfaced as follows:

- 200mm thick concrete bedded on crushed stone (75mm to dust) laid to a minimum depth of 200mm; and

The staff/visitor car park and road linking the two yards is surfaced as follows:

- 200mm thick asphalt on crushed stone (75mm to dust) laid to a minimum depth of 200mm.

7.2.2 Drainage Design

Drawing 10937-000-D in **MPP7** shows a drainage plan of the site.

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The yard area to the north is graded such that surface run-off falls by gravity towards the south eastern corner where it infiltrates into the adjacent bund and unsurfaced areas.

The yard area to the south is graded such that surface run-off falls towards linear cut-off drains running in front and to the side of the existing building. A grip located approximately half way up the yard on the eastern side assist with moderating and directing the flow of water towards the linear drains. Surface run-off entering the linear drains passes into a silt trap from where it is transferred by underground pipe to combined sewer.

On a weekly basis site operatives will inspect the yard drainage systems. This will be recorded and monitored within the site diary.

7.3 Buildings

7.3.1 Surfacing Design and Construction

The processing buildings are surfaced as follows:

- 200mm thick reinforced concrete bedded on crushed stone (75mm to dust) laid to a minimum depth of 200mm.

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.

The Weighbridge Office, Administrative Office, Staff Welfare and Mobile Office are of a self-contained mobile temporary building type.

7.3.2 Drainage Design

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

Roof water from the Processing Building in the southern yard is directed through gutters and downpipes towards the linear surface drains from where it passes to combined sewer.

Roof water from the Processing Building and Mobile Office/Welfare Buildings in the northern yard is either directed through gutters and downpipes, or falls from roofs onto the surfaced yard from where it falls by gravity towards the south eastern corner and infiltrates into the adjacent bund and unsurfaced areas.

7.3.3 Foul Drainage

Foul water from the Welfare Unit is discharged to combined sewer.

7.4 Proposed Changes to Existing Drainage

Block and drainage plans of the site annotated with proposed changes to surfaces and drainage are shown in Drawings 10937-000-C (Rev. A) and 10937-000-D (Rev. A) in **MPP7**. The proposed changes are:

Northern Yard – A linear drain will be installed along the edge of the existing asphalt surfacing to collect water flowing under gravity towards the south eastern boundary of the yard (where it currently pools and infiltrates). Surface water will pass through a silt trap and penstock valve prior to being discharged to combined sewer. An interceptor will also be installed if required by Welsh Water. This scheme is subject to acceptance by Welsh Water and detailed design by a qualified Drainage Engineer. It is also subject to approval by the landowner. On a weekly basis site operatives will inspect the yard drainage systems. This will be recorded and monitored within the site diary.

Quarantine Area – A roofed quarantine area will be constructed in the south western corner of the Northern Yard Area. The floor of the quarantine area will be constructed in concrete with a fall to direct liquids to a sealed sump. On a weekly basis site operatives will inspect the sealed sump and check the level of retained liquid.



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Liquids will be removed and taken to a licensed waste management facility for treatment. This will be recorded and monitored within the site diary.

On completion of detailed design and approval from Welsh Water and the site owner the Operator will agree a schedule for implementation of the above changes with NRW.

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8 SYSTEMS AND PROCEDURES

8.1 Operational Flowchart

The flowchart presented as Drawing 10937-000-G in [MPP7](#) provides a summary of processes and materials flows within the facility.

8.2 Hours of Operation

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

Monday – Friday	Saturday	Sunday	Bank/Public Holidays
07:00hrs – 18:00hrs	07:00hrs – 12:00hrs	Closed	Closed

Table 7. Hours of operation

8.3 Waste Acceptance, Control Systems and Procedures

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

8.4 Waste Quantity Measurement System

A weighbridge is available 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.

8.5 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.

8.6 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.

8.7 Burning of Wastes

Burning of any wastes, either in the open, inside buildings or in any form of incinerator is not permitted.

8.8 Waste storage

8.8.1 General

Waste will be stored in designated areas of the facility.

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Storage areas will include:

- Unprocessed waste
- Pre-sorted waste (awaiting further processing)
- Processed plastics, metals and rubbers (awaiting loading and dispatch)
- Process Fines
- Quarantined waste
- Residual waste

A storage plan for the facility is presented in Drawing 10937-000-E in [MPP7](#).

8.8.2 Outside Storage

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

8.8.3 Storage Durations

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

Material	Number/Tonnes	Storage Time
Incoming Unprocessed Wastes (source segregated uPVC and sources segregated/mixed rigid plastics)	100 Tonnes	48 hours
Quarantined Wastes	10 Tonnes	1 month
Processed Recyclates (uPVC granulate, Ferrous and Non-Ferrous Scrap, EPDM Rubber, Rigid Plastics)	500 Tonnes	3 months
Pre-Sort Waste Fraction Awaiting Further Processing to Recover Recyclates	500 Tonnes	6 months
Process Fines	100 Tonnes	3 months
Residual Waste	200 Tonnes	6 months

8.9 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 (from the Quarantine Area) 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, 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.



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8.10 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 Sections 5.7 and 8.8 respectively.
- 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.

8.11 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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9 POLLUTION CONTROL AND AMENITY MANAGEMENT, MONITORING AND REPORTING SYSTEMS

9.1 Pollution Control and Amenity Management

9.1.1 General

9.1.1.1 Site Inspections

The Site Manager is responsible for carrying out site inspections on a twice daily basis. These inspection 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.

9.1.1.2 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 will provide this information to Natural Resources Wales at least 14 days before the date the monitoring is to be undertaken.

9.1.1.3 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.

9.1.1.4 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](#).

9.1.1.5 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:

- Noise and vibration.
- Flooding from surface water.
- Contamination of groundwater and surface waters due to leaks and spills.

Due to the nature of wastes received, the scale of the facility 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](#).

9.1.2 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.

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9.1.2.1 Noise and Vibration

Site noise is likely to occur during the use of recycling equipment and/or the movement of plant and vehicles on site.

A Noise Management Plan is in place for the site ([MPP6](#)).

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:

- Installed noise reducing equipment (acoustic panels, silencers, etc.) shall be used and maintained;
- Equipment shall be switched off when not in use;
- Treatment operations shall be arranged in such a way as to minimise noise production as far as possible;
- 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 as recommended by the manufacturer; and
- All vehicles and plant used at the facility will be of a roadworthy type and compliant with The Road Vehicles (Construction and Use) Regulations 1986 in respect of engine noise and emissions and exhaust silencers.

9.1.2.2 Flooding

Localised flooding of the site from surface water is an identified risk for the site.

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 Tenant Canal.

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 boundaries of the site would be bunded/have bunding reinforced using appropriate materials in order to retain waste materials within the site and/or impede the flow of floodwater into the site; and
- Where any risk of contaminated water discharging from site as flood waters recede is identified, actions required to retain and manage flood water within the site will be identified and actioned in agreement with Natural Resources Wales and the Emergency Services.

9.1.2.3 Leaks and Spills

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

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.

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- 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.
- 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.

9.1.2.4 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 in the site diary. 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 9.1.2.1 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.

9.1.2.5 Fire Prevention and Control

A Fire Prevention and Mitigation Plan is in place for the site (**MPP5**).

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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 canal. Closure of the penstock valve controlling the discharge of site surface water should be undertaken immediately and site drains to the front of the processing building in the southern yard 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.

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.

9.1.2.6 Dusts, Fibres and Particulates

Due to the nature of the treatment processes employed on-site there is potential for dust to be generated, albeit due to these treatment processes being undertaken in enclosures of buildings under normal operating conditions dust is unlikely to cause nuisance to nearby receptors.

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

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

- Dust generating treatment process to take place within buildings or enclosures wherever feasible to do so;
- 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 at the site boundary, 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;
- Sweeping of the site to remove dust or mud; and
- Cessation of processing until the cause of excessive dust generation has been identified and addressed.

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

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

9.1.2.7 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.

9.1.2.8 Mud and Debris

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

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.

9.1.2.9 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:

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- 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
- 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.

9.1.2.10 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.

9.1.2.11 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;

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- Good fuel tank and transfer pipework design.
- Vehicles shall be compliant with relevant exhaust emissions standards;

9.2 Monitoring

No formal monitoring is required under the existing Permit conditions.

9.3 Reporting

9.3.1 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.

9.3.2 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
- 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.

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9.3.3 Interpretation

As per the meanings described within the permit.

9.4 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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10 SITE RECORDS

10.1 General

All records required to be made by this permit shall:

- a) be legible;
- b) be made as soon as reasonably practicable;
- c) if amended, be amended in such a way that the original and any subsequent amendments remain legible, or are capable of retrieval; and
- d) be retained, unless otherwise agreed in writing by Natural Resources Wales, for at least 6 years from the date when the records were made, or in the case of the following records until permit surrender:
 - (i) off-site environmental effects; and
 - (ii) matters which affect the condition of the land and groundwater.

10.2 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;



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- 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 [MPP7](#) for current Site Drawings and Plans



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