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| Issue                   | v1.0     |
| Date:                   | 01/08/16 |

# **MPP3 Environmental Management System Plan**

## **Plastic Recycling Facility**

**PERMIT NUMBER EPR/HP3938RN**

Fenestration Recycling Company Ltd  
(t/a The National Window Recycling Company)

Neath Abbey Wharf

Skewen

Neath

SA10 6BL



**Fenestration Recycling Company Ltd  
ENVIRONMENTAL MANAGEMENT SYSTEM**

**Environmental Management System Plan**

|                                |          |
|--------------------------------|----------|
| <b>Controlled Document No.</b> |          |
| Issue                          | v1.0     |
| Date:                          | 01/08/16 |

**Document Revisions**

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|                         |          |
|-------------------------|----------|
| Controlled Document No. |          |
| Issue                   | v1.0     |
| Date:                   | 01/08/16 |

## CONTENTS

|  | Page     |
|--|----------|
| <b>1 INTRODUCTION.....</b>   | <b>1</b> |
| 1.1 Purpose of this Document.....  | 1        |
| 1.2 Overview.....  | 1        |
| 1.3 Compliance with Permit Requirements .....                                  | 2        |
| 1.4 EMS Review .....   | 3        |
| 1.5 Regulations and Guidance.....  | 3        |
| <b>2 PERMIT DETAILS AND CONTACTS .....</b>                                     | <b>1</b> |
| 2.1 Environmental Permit Number .....  | 1        |
| 2.2 Site Operator .....  | 1        |
| 2.3 Site Contacts.....   | 1        |
| <b>3 SITE DETAILS .....</b>  | <b>1</b> |
| 3.1 Site Location .....  | 1        |
| 3.2 Site Access .....  | 1        |
| 3.3 Site Ownership .....   | 1        |
| 3.4 Site Layout.....   | 1        |
| 3.5 Sensitive Receptors .....  | 2        |
| 3.6 Flood Risk .....   | 2        |
| 3.7 Groundwater .....  | 3        |
| <b>4 MANAGEMENT .....</b>  | <b>1</b> |
| 4.1 General Management .....   | 1        |
| 4.1.1 Site Operations.....   | 1        |
| 4.1.2 Site Personnel .....   | 1        |
| 4.1.3 Access to Permit.....  | 1        |
| 4.1.4 Technically Competent Person .....                                       | 1        |
| 4.1.5 Staff Training .....   | 1        |
| 4.1.6 Site Health and Safety.....  | 2        |
| 4.2 Avoidance, Recovery and Disposal of Wastes Produced by the Activities..... | 2        |
| 4.2.1 Waste Hierarchy.....   | 2        |
| 4.2.2 Review .....   | 2        |
| <b>5 OPERATIONS.....</b>   | <b>3</b> |
| 5.1 Current Site Usage.....  | 3        |



**Fenestration Recycling Company Ltd  
ENVIRONMENTAL MANAGEMENT SYSTEM**

**Environmental Management System Plan**

|                                |          |
|--------------------------------|----------|
| <b>Controlled Document No.</b> |          |
| Issue                          | v1.0     |
| Date:                          | 01/08/16 |

5.2 Permitted Activities ..... 3

5.3 The Site ..... 4

5.4 Operating techniques ..... 4

5.5 Discharges from Site..... 5

5.6 Technical Requirements ..... 5

5.7 Site Capacity ..... 5

**6 SITE INFRASTRUCTURE ..... 6**

6.1 Site Entrance ..... 6

6.2 Site Accommodation ..... 6

6.3 Plant and Equipment..... 6

6.4 Lighting ..... 7

6.5 Site Security..... 7

6.5.1 Boundary Treatments ..... 7

6.5.2 Manned Security ..... 7

6.6 Inspection and Maintenance Procedures for Site Infrastructure ..... 7

**7 SITE ENGINEERING FOR POLLUTION PREVENTION AND CONTROL ..... 9**

7.1 Overview of Site ..... 9

7.2 Yard Areas ..... 9

7.2.1 Surfacing Design and Construction ..... 9

7.2.2 Drainage Design ..... 9

7.3 Buildings ..... 10

7.3.1 Surfacing Design and Construction ..... 10

7.3.2 Drainage Design ..... 10

7.3.3 Foul Drainage ..... 10

7.4 Proposed Changes to Existing Drainage ..... 10

**8 SYSTEMS AND PROCEDURES ..... 12**

8.1 Operational Flowchart..... 12

8.2 Hours of Operation..... 12

8.3 Waste Acceptance, Control Systems and Procedures..... 12

8.4 Waste Quantity Measurement System ..... 12

8.5 Waste Sampling and Testing ..... 12

8.6 Waste Treatment Procedures ..... 12

8.7 Burning of Wastes ..... 12

8.8 Waste storage ..... 12



**Fenestration Recycling Company Ltd  
ENVIRONMENTAL MANAGEMENT SYSTEM**

**Environmental Management System Plan**

|                                |          |
|--------------------------------|----------|
| <b>Controlled Document No.</b> |          |
| Issue                          | v1.0     |
| Date:                          | 01/08/16 |

8.8.1 General..... 12

8.8.2 Outside Storage..... 13

8.8.3 Storage Durations ..... 13

8.9 Dispatch..... 13

8.10 Contingency..... 14

8.11 Records..... 14

**9 POLLUTION CONTROL AND AMENITY MANAGEMENT, MONITORING AND REPORTING SYSTEMS..... 15**

9.1 Pollution Control and Amenity Management ..... 15

9.1.1 General..... 15

9.1.2 Management of Environmental Risks ..... 15

9.2 Emissions and Monitoring..... 20

9.3 Reporting..... 20

9.3.1 Periodic Reporting of Environmental Performance..... 20

9.3.2 Notifications..... 20

9.3.3 Interpretation..... 21

9.4 Complaints..... 21

**10 SITE RECORDS ..... 23**

10.1 General ..... 23

10.2 Security and Availability of Records ..... 23

**DRAWINGS AND PLANS ..... 25**



| Controlled Document No. |          |
|-------------------------|----------|
| Issue                   | v1.0     |
| Date:                   | 01/08/16 |

## 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, Skewen, Neath, 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 was prepared to support the submission of an application to Natural Resources Wales for a normal variation (to permit EPR/HP3938RN/T001) to change the waste operations from those of a Waste Transfer Station (A11) to physical treatment of waste (A16), to increase the area of the permitted site, to change EWC codes permitted onsite and to increase the tonnage limits for storing waste on-site. The permit was also consolidated to a modern permit template and conditions.

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.

The permitted operations may be observed as:

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

|                         |          |
|-------------------------|----------|
| Controlled Document No. |          |
| Issue                   | v1.0     |
| Date:                   | 01/08/16 |

- 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.

The site has an annual throughput of 24,999 tonnes per annum.

### 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<br>(b) Procedure <b>PR8</b> and TCM Attendance  |
| 1.1.2                        | Records demonstrating compliance | Site Diary<br>Archived Forms FR1 - FR11<br>Compliance Audits (Internal/External)  |
| 1.1.3                        | Permit copy                      | Copy on Staff Notice Board and in Weighbridge Office  |
| 1.1.4                        | Competence scheme                | Procedure <b>PR8</b> and copies of TCM qualifications   |
| 1.2.1                        | Waste hierarchy                  | (a) and (b) Environmental Policy and EMS Plan 4.2.1<br>(c) EMS Plan 4.2.1   |
| 1.2.2                        | Review                           | EMS Plan 1.4  |
| 2.1.1                        | Permitted activities             | EMS Plan 5.2<br>Compliance Audits (Internal/External)   |
| 2.2.1                        | Site Boundary                    | Drawing 10937-000-A in <b>MPP7</b><br>Daily site inspections<br>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 <sup>1</sup><br><br>EMS Plan sections 5.4 |
| 2.3.2                        | Waste acceptance                 | EMS Plan <b>Error! Reference source not found.</b><br>EMS Plan 8.3<br>Procedure <b>PR7</b>  |
| N/A                          | Technical Requirements           | EMS Plan 5.6  |
| 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   |

<sup>1</sup> [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/298118/LIT\\_8199\\_dd704c.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/298118/LIT_8199_dd704c.pdf)

|                                |          |
|--------------------------------|----------|
| <b>Controlled Document No.</b> |          |
| Issue                          | v1.0     |
| Date:                          | 01/08/16 |

|             |                        |   |
|-------------|------------------------|---|
| 3.3.1       | Noise and Vibration    | EMS Plan 9.1.2.1<br><b>MPP6</b> Noise management Plan               |
| 3.4.1       | Fire                   | EMS Plan 9.1.2.5<br><b>MPP5</b> Fire Prevention and Mitigation Plan |
| 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**

#### **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
- Horizontal Guidance Note H3 Part 2 - Noise Assessment and Control, v3 June 2004



**Fenestration Recycling Company Ltd  
ENVIRONMENTAL MANAGEMENT SYSTEM**

**Environmental Management System Plan**

| Controlled Document No. |          |
|-------------------------|----------|
| Issue                   | v1.0     |
| Date:                   | 01/08/16 |

- Horizontal Guidance Note H4 Odour Management, March 2011
- Horizontal Guidance - H6 Environmental Management Systems

Elements of this environmental management system plan also consider guidance from the following documents:

- Working Plan Guidance and Specification, Volume 1, 19 February 2000
- Technical Guidance Document: 'How to comply with your environmental permit'
- Sector Guidance Note IPPC S5.06: Guidance for the Recovery and Disposal of Hazardous and Non Hazardous Waste
- Fire prevention and mitigation plan guidance – Waste Version 1, May 2016
- Environmental Management Toolkit - General Version for Waste Handling Industry, Environment Agency



| Controlled Document No. |          |
|-------------------------|----------|
| Issue                   | v1.0     |
| Date:                   | 01/08/16 |

## 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

Skewen

Neath

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: 07968 186557 (Arfon Jones)

Email: arfon@ssco.co.uk

| Controlled Document No. |          |
|-------------------------|----------|
| Issue                   | v1.0     |
| Date:                   | 01/08/16 |

### 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.

The Grid reference of the site access is SS 72817 96421.

#### 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.

|                         |          |
|-------------------------|----------|
| Controlled Document No. |          |
| Issue                   | v1.0     |
| Date:                   | 01/08/16 |

### 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 Pentreffynnon areas to the south of Skewen.

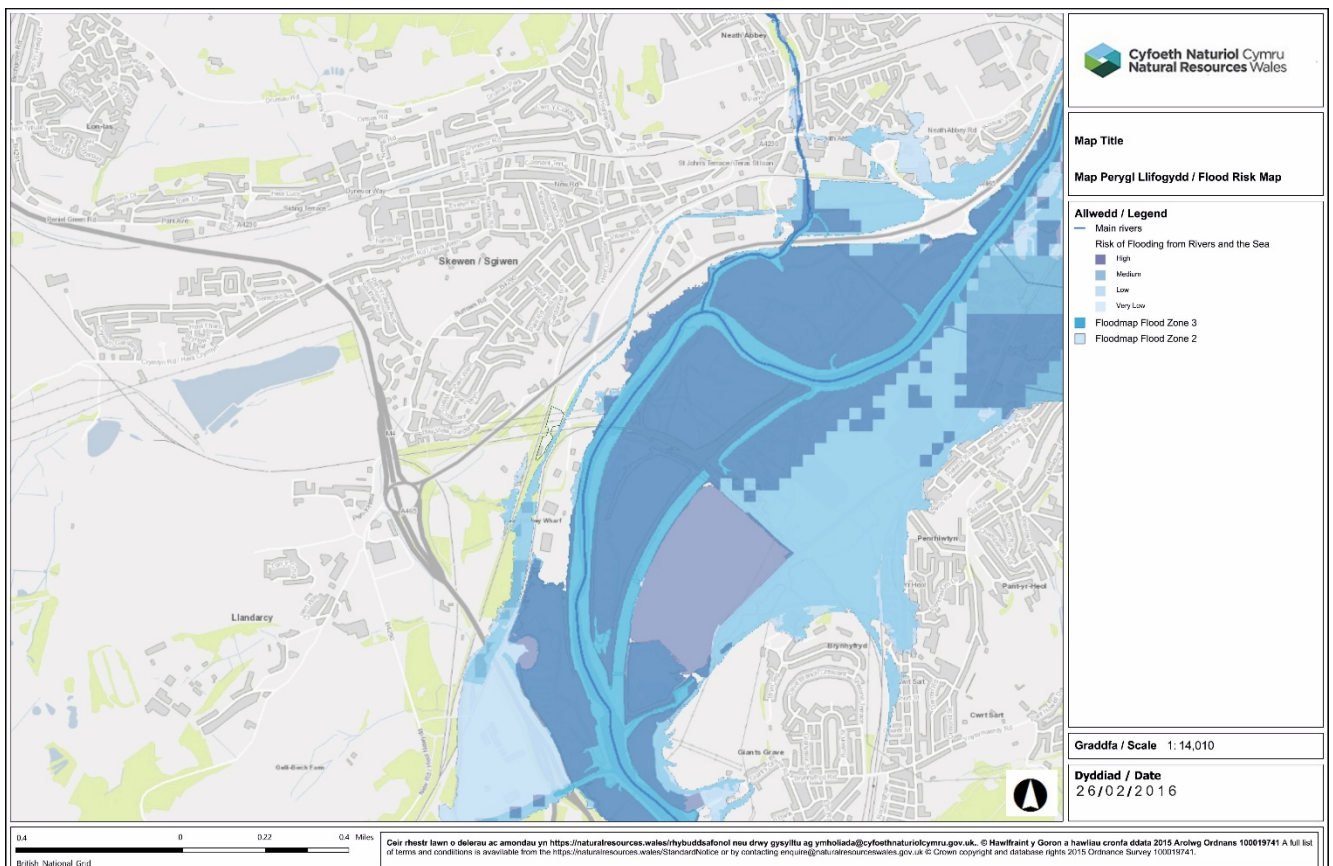
The following designated sites (SSSI, SAC, RAMSAR, etc.) are located within 2km of the site.

- Earlswood Road Cutting and Ferryboat Inn Quarries SSSI (<2km)
- Pant-Y-Sais (<2km)
- Crymlyn Bog/Cors Crymlyn SAC (>1km)
- Crymlyn Bog RAMSAR (>1km)
- Crymlyn Bog and Pant-Y-Sais NNR (>1km)

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

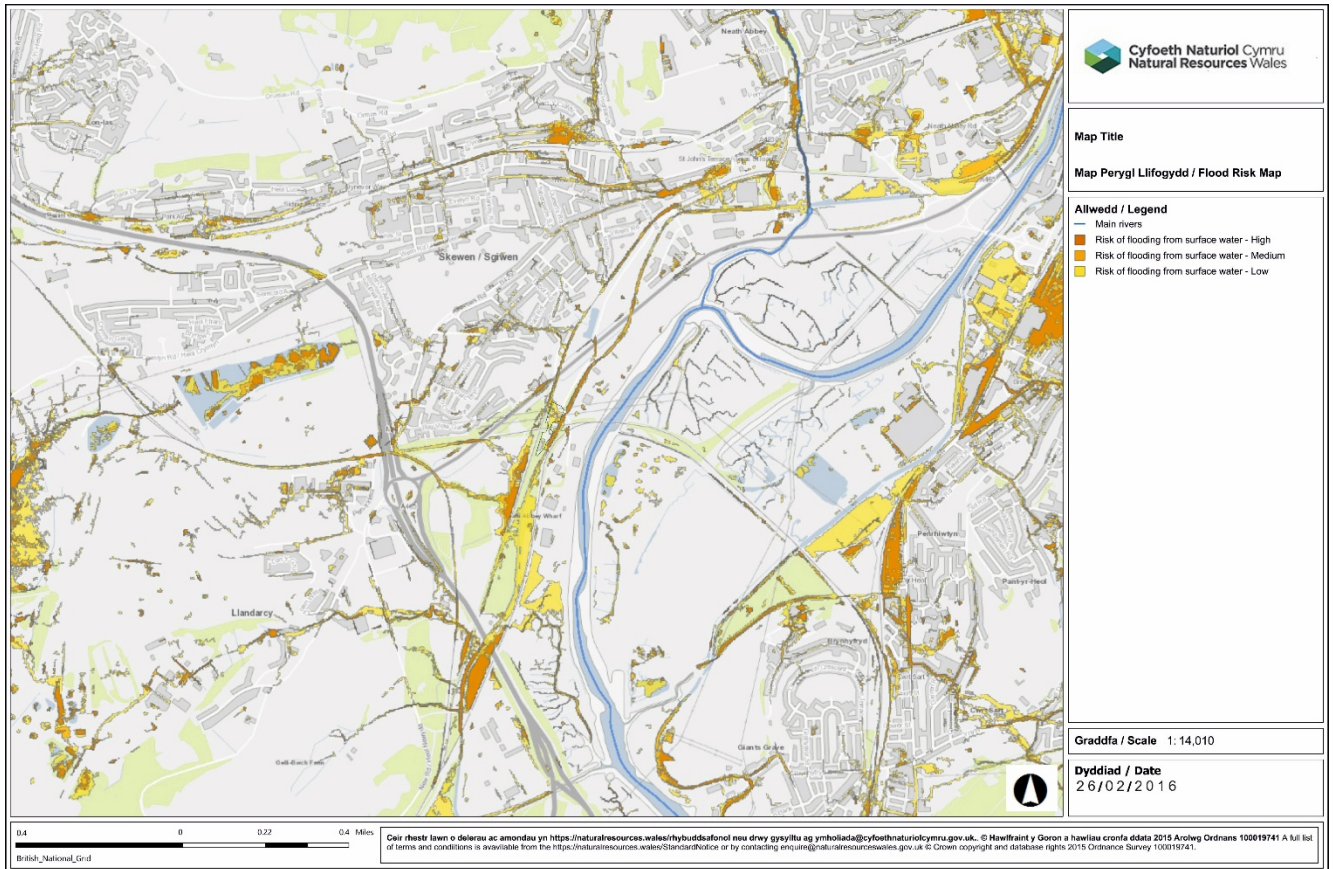
### 3.6 Flood Risk

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.



|                         |          |
|-------------------------|----------|
| Controlled Document No. |          |
| Issue                   | v1.0     |
| Date:                   | 01/08/16 |

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



**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.



| Controlled Document No. |          |
|-------------------------|----------|
| Issue                   | v1.0     |
| Date:                   | 01/08/16 |

## 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.

| Controlled Document No. |          |
|-------------------------|----------|
| Issue                   | v1.0     |
| Date:                   | 01/08/16 |

- 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.

|                                |          |
|--------------------------------|----------|
| <b>Controlled Document No.</b> |          |
| Issue                          | v1.0     |
| Date:                          | 01/08/16 |

## 5 OPERATIONS

### 5.1 Current Site Usage

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.

### 5.2 Permitted Activities

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

| Description of Activities  | Limits of Activities  |
|--|---|
| <p><b>R3</b> Recycling/reclamation of organic substances which are not used as solvents (including composting and other biological transformation processes)</p> <p><b>R4</b> Recycling/reclamation of metals and metal compounds</p> <p><b>R5:</b> Recycling/reclamation of other inorganic compounds</p> <p><b>R13:</b> Storage of wastes pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced)</p> | <p>Treatment operations shall be limited to manual and/or mechanical:</p> <ul style="list-style-type: none"> <li>- sorting</li> <li>- separation</li> <li>- screening</li> <li>- shredding</li> <li>- crushing</li> <li>- cutting</li> <li>- granulation</li> <li>- mixing</li> <li>- compaction</li> <li>- baling</li> <li>- bulking</li> </ul> <p>for the purpose of recovery only.</p> <p>All waste shall be stored and treated on an impermeable surface with sealed drainage.</p> <p>Waste types as specified in Table 6.</p>  |
| Discharge of site drainage   | <p>Drainage consisting solely of clean, rainfall dependant drainage from areas of the site not used in connection with the storage and/or treatment of waste. No visible oil or grease, or suspended solids shall be present in the discharge.</p> <p>There shall be no discharge from the buildings and containers on site used to store and/or treat waste.</p> <p>Drainage from areas of the site used in connection with the storage and/or treatment of waste may be discharged to sewer (subject to a consent issued by the local water company) or may be taken off-site in a tanker for disposal or recovery at a suitably authorised facility.</p> |

**Table 4. Authorised activities.**

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|--------------------------------|----------|
| <b>Controlled Document No.</b> |          |
| Issue                          | v1.0     |
| Date:                          | 01/08/16 |

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.

### 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.  |
|--|---|--|
| Technical Guidance Document: 'How to comply with your environmental permit'                                  | All relevant sections   |  |
| Sector Guidance Note IPPC S5.06: Guidance for the Recovery and Disposal of Hazardous and Non Hazardous Waste | All relevant sections   |  |
| Fire prevention and mitigation plan guidance – Waste Version 1, May 2016                                     | All relevant sections   |  |
| This Management System Plan  | 'SD3c - Fenestration Recycling Company - Environmental Management System Plan':<br>- Section 6.5.1<br>- Section 8.10<br>- Section 9.1.2.1<br>- Section 9.1.2.2<br>- Section 9.1.2.3<br>- Section 9.1.2.4<br>- Section 9.1.2.6 | MPP3 Environmental Management System Plan (Wording as at 23/03/16 unless any changes are subsequently agreed with NRW) |
| Additional information received via email in response to Schedule 5 Notice dated 03/06/16                    | '8923e_Report_Rev2_201607 05' (Noise Management Plan):<br>- Section 2.7<br>- Section 3.2<br>- Section 3.3<br>- Section 3.4  | MPP6 Noise Management Plan (Wording as at 12/07/16 unless any changes are subsequently agreed with NRW)                |
|  | 'Schedule 5 responses 120716':<br>- PR7 - Waste Acceptance Procedure  | Wording as at 12/07/16 unless any changes are subsequently agreed with NRW.  |

**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

|                                |          |
|--------------------------------|----------|
| <b>Controlled Document No.</b> |          |
| Issue                          | v1.0     |
| Date:                          | 01/08/16 |

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.

**Exclusions:**

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

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

|           |  |
|-----------|--|
| <b>17</b> | <b>CONSTRUCTION AND DEMOLITION WASTES (INCLUDING EXCAVATED SOIL FROM CONTAMINATED SITES)</b>   |
| 17 02     | wood, glass and plastic  |
| 17 02 03  | plastic  |
| 17 09     | other construction and demolition wastes   |
| 17 09 04  | mixed construction and demolition wastes other than those mentioned in 17 09 01, 17 09 02 and 17 09 03 (consisting of plastic wastes (including windows, window frames, doors and door frames which may also contain metal and/or glass) only) |
| <b>19</b> | <b>WASTES FROM WASTE MANAGEMENT FACILITIES, OFF-SITE WASTE WATER TREATMENT PLANTS AND PREPARATION OF WATER INTENDED FOR HUMAN CONSUMPTION/INDUSTRIAL USE</b>   |
| 19 12     | wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified   |
| 19 12 04  | plastic and rubber   |

**Table 6. Permitted waste types and quantities.**

**5.5 Discharges from Site**

Point source emissions into surface waters or groundwater are not permitted.

Discharge(s) of site drainage are permitted 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.

| Controlled Document No. |          |
|-------------------------|----------|
| Issue                   | v1.0     |
| Date:                   | 01/08/16 |

## 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.

|                                |          |
|--------------------------------|----------|
| <b>Controlled Document No.</b> |          |
| Issue                          | v1.0     |
| Date:                          | 01/08/16 |

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



**Fenestration Recycling Company Ltd  
ENVIRONMENTAL MANAGEMENT SYSTEM**

**Environmental Management System Plan**

| Controlled Document No. |          |
|-------------------------|----------|
| Issue                   | v1.0     |
| Date:                   | 01/08/16 |

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.

|                                |          |
|--------------------------------|----------|
| <b>Controlled Document No.</b> |          |
| Issue                          | v1.0     |
| Date:                          | 01/08/16 |

## 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 with sealed drainage. (Northern part of site)  |
| Treatment of wastes  | Manual sorting, segregation, screening, shredding – Outdoors on impermeable surface with sealed drainage. (Northern part of site)<br><br>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 with sealed drainage. (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.

|                                |          |
|--------------------------------|----------|
| <b>Controlled Document No.</b> |          |
| Issue                          | v1.0     |
| Date:                          | 01/08/16 |

The yard area to the north is graded such that surface water flows by gravity towards the south east of the yard (the staff/visitor parking area) where it pools against an impermeable bund wall, behind which is a 0.5m high soil bund that separates the site from the Tenant Canal. Surface water is removed and tankered away from site for treatment at a suitably licensed waste management facility.

The yard is graded such that surface run-off falls towards linear cut-off drains running in front and to the side of the existing processing building. A grip located approximately half way up the yard on the eastern side assists 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 the northern yard where it discharges to combined sewer.

The yard is enclosed by a brickwork retaining wall and bund on both the western boundary with the railway embankment and the eastern boundary with the Tenant Canal. The retaining wall along the boundary with Tenant Canal terminates at the end of the impermeable surface (that finishes approximately half way along the processing building). A sand bag wall between the building and retaining wall completes the site bunding. The rear of the site is separated from the canal by a 4m high bund.

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 is captured within the bund wall described in 7.2.2.

#### **7.3.3 Foul Drainage**

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

### **7.4 Proposed Changes to Existing Drainage**

The Operator has made enquiries to Welsh Water to enable the discharge of surface run-off from the northern yard area to combined sewer. Subject to approval from Welsh Water, it is anticipated that a new drainage scheme will be in place within the next 6-12 months.



**Fenestration Recycling Company Ltd  
ENVIRONMENTAL MANAGEMENT SYSTEM**

**Environmental Management System Plan**

|                                |          |
|--------------------------------|----------|
| <b>Controlled Document No.</b> |          |
| Issue                          | v1.0     |
| Date:                          | 01/08/16 |

On completion of detailed design and approval from Welsh Water and the site owner, the Operator will agree any changes with NRW prior to implementation.

|                                |          |
|--------------------------------|----------|
| <b>Controlled Document No.</b> |          |
| Issue                          | v1.0     |
| Date:                          | 01/08/16 |

## 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.

|                                |          |
|--------------------------------|----------|
| <b>Controlled Document No.</b> |          |
| Issue                          | v1.0     |
| Date:                          | 01/08/16 |

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<br>(source segregated uPVC and sources segregated/mixed rigid plastics)  | 100 Tonnes    | 48 hours     |
| Quarantined Wastes   | 10 Tonnes     | 1 month      |
| Processed Recyclates<br>(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.



| Controlled Document No. |          |
|-------------------------|----------|
| Issue                   | v1.0     |
| Date:                   | 01/08/16 |

### 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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|-------------------------|----------|
| Controlled Document No. |          |
| Issue                   | v1.0     |
| Date:                   | 01/08/16 |

## 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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|--------------------------------|----------|
| <b>Controlled Document No.</b> |          |
| Issue                          | v1.0     |
| Date:                          | 01/08/16 |

### 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

EMS **Procedure PR4** details the procedure and should be followed in the event of a flood.

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 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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|--------------------------------|----------|
| <b>Controlled Document No.</b> |          |
| Issue                          | v1.0     |
| Date:                          | 01/08/16 |

- 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**). EMS **Procedure PR2** details the procedure and should be followed in the event of a fire or explosion.

| Controlled Document No. |          |
|-------------------------|----------|
| Issue                   | v1.0     |
| Date:                   | 01/08/16 |

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

#### 9.1.2.6 *Dusts, Fibres and Particulates*

EMS **Procedure PR5** details the procedure and should be followed in the event of air emissions from site.

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.

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.

|                                |          |
|--------------------------------|----------|
| <b>Controlled Document No.</b> |          |
| Issue                          | v1.0     |
| Date:                          | 01/08/16 |

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:

- 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;

|                                |          |
|--------------------------------|----------|
| <b>Controlled Document No.</b> |          |
| Issue                          | v1.0     |
| Date:                          | 01/08/16 |

- 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**

EMS [Procedure PR5](#) details the procedure and should be followed in the event of air emissions from site.

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

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

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

## **9.2 Emissions and Monitoring**

No emission limits or associated monitoring requirements are specified under Schedule 34 of the current permit.

## **9.3 Reporting**

No reporting is specified under Schedule 4 of the current permit.

### **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 where applicable):

- Schedule 5 Part A of current permit
  - Malfunction, breakdown or failure of equipment or techniques, accident, or emission of a substance not controlled by an emission limit which has caused, is causing or may cause significant pollution ( within 24 hours of detection);
  - Breaches of a limit (within 24 hours of detection); and
  - The detection of any significant adverse environmental effect (within 24 hours of detection).
- Schedule 5 Part B of current permit
  - Any more accurate information on the matters for notification under Part A (to be submitted as soon as practicable);

|                                |          |
|--------------------------------|----------|
| <b>Controlled Document No.</b> |          |
| Issue                          | v1.0     |
| Date:                          | 01/08/16 |

- Measures taken, or intended to be taken, to prevent a recurrence of the incident (to be submitted as soon as practicable);
- Measures taken, or intended to be taken, to rectify, limit or prevent any pollution of the environment which has been or may be caused by the emission (to be submitted as soon as practicable); and
- The dates of any unauthorised emissions from the facility in the preceding 24 months (to be submitted as soon as practicable).
- Other notifications (not specified in permit)
  - 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.

### 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.



**Fenestration Recycling Company Ltd  
ENVIRONMENTAL MANAGEMENT SYSTEM**

**Environmental Management System Plan**

|                                |          |
|--------------------------------|----------|
| <b>Controlled Document No.</b> |          |
| Issue                          | v1.0     |
| Date:                          | 01/08/16 |

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.

| Controlled Document No. |          |
|-------------------------|----------|
| Issue                   | v1.0     |
| Date:                   | 01/08/16 |

## 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;



**Fenestration Recycling Company Ltd  
ENVIRONMENTAL MANAGEMENT SYSTEM**

**Environmental Management System Plan**

|                                |          |
|--------------------------------|----------|
| <b>Controlled Document No.</b> |          |
| Issue                          | v1.0     |
| Date:                          | 01/08/16 |

- 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.



|                                |          |
|--------------------------------|----------|
| <b>Controlled Document No.</b> |          |
| Issue                          | v1.0     |
| Date:                          | 01/08/16 |

## DRAWINGS AND PLANS

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



**Fenestration Recycling Company Ltd  
ENVIRONMENTAL MANAGEMENT SYSTEM**

**Environmental Management System Plan**

|                                |          |
|--------------------------------|----------|
| <b>Controlled Document No.</b> |          |
| Issue                          | v1.0     |
| Date:                          | 01/08/16 |

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