TD TYRE RECYCLING FACILITY, JOHNSTOWN, CARMARTHEN

ENVIRONMENTAL MANAGEMENT SYSTEM

Report Number 2161r4v1d1021

Permit reference:

Waste returns reference:

Operator:
TD Tyre Recycling Ltd

Site Address:
Plot 7, Cillefwr Road West, Alltycnap Road,
Johnstown,
Carmarthenshire SA31 3RB

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1 INTRODUCTION TO EMS

1.1 The Permit

TD Tyres operate a waste tyre and agricultural wrap recycling facility at Cillefwr Industrial Estate, Carmarthen. The operation holds an important position in the recycling of end of life tyres in South Wales as the recycling service is provided to a wide range of customers including commercial and public organisations, helping them fulfil their Duty of Care. To ensure a high level of service is maintained the operation is subject to an in-house Environmental management System (EMS). The site location is shown in Figure 1.

1.2 Purpose of this Environmental Management System (EMS)

This EMS ensures potential risks to the environment from the operation are controlled, managed and minimised. The risks have been separately evaluated in an Environmental Risk Assessment (ERA).

1.3 Using the EMS

The risks to the environment are controlled and minimised by the site layout and pollution control measures. During day-to-day operations all aspects are subject to inspection and procedures aimed at minimising environmental risks.

- The Procedures to be followed are provided in Appendix 2.
- The information to be gathered during implementation of the EMS will be recorded in the Site Diary.

2 COMMITMENT TO EMS

2.1 Policy Statement

TD Tyres is fully committed to:

- Recycling tyres in a way that does not pose a significant risk to the environment and in accordance with a documented Environmental Management System.
- Meeting and, where appropriate, exceeding the requirements of relevant legislation, regulations and other requirements.
- Implementing procedures to detect and, where possible, prevent pollution.
- Working with the regulators, clients, sub-contractors, customers and third parties to minimise environmental impact.
- Providing appropriate environmental training to its employees and communicating environmental issues to all employees.

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

This Policy will be annually reviewed.

Signed For and on behalf of the Board of Directors

Tony Davies
Director

Date 12 June 2021 Review Date 12 June 2022

2.2 Guidance and Legislation

To help ensure that the operation meets current legislation and good practice, the operation will take into account guidance and review applicable legislation. This will include those identified in the reference list.

2.3 Operator Competence

The operator recognises that an EMS should not be viewed in isolation as many aspects of the business can impact on the successful implementation of the EMS. The operator also recognises that the role of the management representative is not to undertake all of the work required to implement the EMS. For this reason, TD will document the roles and responsibilities for all personnel. Key authorities and responsibilities will be defined, documented and communicated to all employees.

All employees will be made aware of their responsibility in achieving conformance with the environmental policy and the requirements of the EMS. Table 2-1 summarises the basic requirements for different levels of employees.

Table 2-1 Minimum expectations for site Personnel

Title	Responsibility
Top Management	Define and approve issue of the environmental policy Nominate an environmental management representative Review the EMS at set intervals
Management	Provide sufficient resources essential to the implementation and control of the EMS
Management Representative	Ensure establishment of EMS and reporting on performance to the top management
Site personnel	Responsibilities are dependent upon their role Key part of day-to-day implementation of EMS

2.4 Technically Competent Manager (TCM)

To operate under a Permit, trained and competent staff are required. On this basis, Mr Tony Davies (site manager) will be the TCM.

The TCM is not the sole individual responsible for ensuring compliance with the Permit or implementing the EMS as this requires input from the whole company and all relevant personnel involved with the permitted activities.

The WAMITAB certification for Mr Davies is included in Appendix 4.

2.5 Relevant Training

All relevant staff working on the permitted activities will be trained on the requirement of the Permit and the EMS.

Management will ensure that all relevant staff are:

- trained in aspects that can lead to pollution and the measures to be taken to prevent that pollution.
- trained to deal with accidents.
- aware of responsibilities under the Permit and Management Plans.

- aware of the importance of equipment and plant maintenance.
- competent to operate machinery and provided with safe operating instructions for that equipment or activity.
- appropriately inducted, including contractors.

Records of training will be maintained.

The management is fully committed to protecting the environment and demonstrating continual environmental improvement. Through effective training, communication and delegation, management will encourage all employees to be committed to the full implementation of this EMS.

3 WASTE OPERATION OVERVIEW

3.1 Operating Hours

The site typically operates between the hours of 07:00 and 17:00 Monday to Friday during the spring and summer months, which reduces to 08:00 to 17:00 between October and February.

3.2 Inductions and Visitors

Visitors to the site will sign the visitor's book upon arrival and departure. Visitors will be notified of the requirements for users of the site.

3.3 Waste Activities

The permitted activities are summarised in Table 3-1 with the list of permitted wastes summarised in Table 3-2. The main focus of the operation is on tyre baling and transfer with agricultural plastic wrapping forming a tiny part (<1%) of the annual waste throughput.

Table 3-1 Permitted Activities

Description of activities	Limits of activities
Storage of Tyres **R13**: Storage of waste pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced) **D15**: Storage pending any of the waste operations numbered D1 to D14 (excluding temporary storage pending collection, on the site where it is produced) **D14:** Repackaging of waste	External storage of tyres No tyres stored within 2m of any boundary In stable stacks as agreed with FRS and set out in current Fire Plan Waste types as per Table 3-2
Treatment of tyres and plastic **R3**: Recycling/reclamation of organic substances which are not used as solvents **R4**: Recycling/reclamation of metals and metal compounds **D9:** for the treatment operation	Treatment consisting only of manual sorting, separation or baling of non-hazardous tyres and plastic for disposal or recovery. Waste types as per Table 3-2

Table 3-2 List of Acceptable Wastes

Waste Code	Description
15	**WASTE PACKAGING**
15 01	**Packaging**
15 01 02	Plastic packaging
16	**WASTES NOT OTHERWISE SPECIFIED IN THE LIST**
16 01	**end-of-life vehicles from different means of transport [including off-road machinery] and wastes from dismantling of end-of-life vehicles and vehicle maintenance (except 13,14, 16 06 and 16 08)**
16 01 03	end-of-life tyres

3.4 Site Layout

The site layout is shown in Figure 2. This shows that the operation will be essentially split between:

- a portacabin office
- an electrically powered baler
- external hardstanding used for temporary waste storage

3.5 Waste Acceptance

Waste acceptance is documented in Procedure PR1 (see Appendix 2).

3.5.1 Pre-Waste Acceptance

Virtually all of the tyres processed are collected from customer facilities by the dedicated fleet of TD tyre collecting LGVs. As each tyre requires manual handling into the vehicles, this allows each tyre to be visually inspected prior to acceptance onto the vehicle and prior to arrival at the TD site. This significantly reduces the opportunity of non-conforming waste being accepted.

3.5.2 Waste Acceptance

All wastes received at the site will be visually inspected a second time as they are unloaded to confirm that no non-conforming wastes are being inadvertently accepted.

3.5.3 Waste Storage

During acceptance, the loose tyres are placed adjacent to the baler. On the rare occasions that this is not possible, the loose tyres may be placed into one of the dedicated stacking areas closest to the baler shown on Figure 2.

3.6 Baling

Acceptable tyres are baled using an electrically powered mechanical baler. Typically, a car tyre bale will contain ~ 120 tyres, depending on the size of the tyres. A bale produced from truck tyres will be dimensionally similar to the car tyre bale but may contain around 18 tyres.

An additional process removing the tyre's side-walls is required prior to compression and banding.

The bale is produced using a specialist tyre baling machine that utilises powerful hydraulic rams to compress the tyres once they have been loaded in a specific sequence. Once the bale has been formed and is under pressure, tie wires are secured around the bale before it is ejected from the baler. When the baling process is complete the bale typically has a footprint of 1.4m by 1.4m and a height of 0.75m. As each tyre may weigh ~10kg, a bale would weigh approximately 1.2 tonne.

3.7 Storage

The baled tyres will be stored in a stable configuration with each stack separated by a free air gap to allow vehicular access and manoeuvring and to minimise the potential spread of fire. The configuration is shown on Figure 2 and comprises stacks with a volume of 94m^3, a footprint of 5.6m x 5.6m and 4 bales high (~3m high). This allows 64 bales to be placed into a stack with 16 bales on each lift. Each stack is surrounded by a 3m air gaps. The total storage capacity is therefore approximately 25 stacks or 1920 tonne.

4 LIQUID MANAGEMENT

4.1 Fuel for Site Plant / Vehicles

Fuel for on-site plant is delivered to the site and stored within a bunded tank located adjacent to the baler.

Small quantities of oil are stored in a shipping container.

5 MAINTENANCE AND SECURITY

5.1 Preventative Maintenance

A Planned Preventative Maintenance programme is to be followed. This comprises checks of all site infrastructure, maintenance contracts with relevant suppliers and self-maintenance.

A digital record of the preventative maintenance programme will be maintained based on the information outlined on the form in Appendix 3.

5.2 Site Security

The site benefits from CCTV.

5.3 Provision of Site Identification Board

A large visible sign identifying the site shall be placed at the site entrance and will display the following information:

- the site name and address
- the operator's name if different (company name at least)
- an emergency contact name and the permit-holder and/or operator's telephone number
- a statement that the site is permitted by NRW
- the permit number
- NRW emergency contact numbers, currently 0300 065 3000
- the days and hours when the site is open to receive waste

6 EMERGENCY PLAN

Emergency contact details are summarised in Table 6-1.

Table 6-1 Emergency Contact Details

SITE DETAILS FOR TD TYRES LTD			
Site address: Plot 7, Cillefwr Road West, Alltycnap Road, Johnstown, Carmarthenshire			
Postcode: SA31 3RB			
Operator Tel number (24 hrs): Tony Davies 07967 212469			
Site Access Grid Reference: E239030 N218889 or SN 39030 18889			
What3words location reference for site entrance: weeds.varieties.campers			
NEAREST HOSPITAL	Glanwili Hospital, Dolgwili Rd, Carmarthen SA31 2AF		
SITE CONTACTS	Name	Office Hours (specify)	Out of hours
Landlord	John Williams (Crwbin quarries)	07480 807595	07480 807595
EMERGENCY SERVICES		Office Hours	Out of hours
Emergency		999	999
REGULATORS		Office Hours	Out of hours
Health and Safety Executive (HSE)		0345 300 9923	0151 922 9235
Local Authority:		01267 234567	01267 234567
NRW (24 hour emergency hotline)		0300 065 3000	0300 065 3000
UTILITY/KEY SERVICES	Name	Office Hours	Out of hours
Water undertaker:	Welsh Water	0800 052 0145	
Electricity supplier:	via Landlord		
Fuel supplier:	Oil4Wales	01267 275777	01267 275777
Waste contractor	Cres	01267 223500	01267 223500
NEIGHBOURS	Name	Office Hours	Out of hours
Gordon's garage		07813 969239	07813 969239
Ty Arfryn Care Home		01267 231589	
Residential properties	TBC	TBC	

6.1 Accidents and Incidents

The Emergency Procedures Plan (PR3) details the approaches that should be followed in the event of an accident or pollution incident. PR4 details the specific actions to be taken in the event of a spillage. Any incident should be recorded in the Site Diary.

6.2 Management of Environmental Risks

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

6.3 Leaks and Spills

EMS Procedure PR4 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 bunded tanks.
- Delivery of fuels and oils will be supervised by a responsible member of staff.
- The quantity of fuel in storage will be checked, either using a sight glass or by dipping, prior to the fuel delivery being made. The maximum residual capacity of the tank will be determined prior to the commencement of re-filling, to prevent overfill.
- 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 always 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 and groundwater.
- Records shall be recorded in the site diary 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 be investigated to establish the root cause of the problem and, lessons to be learnt

6.4 Fire Prevention and Control

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

6.5 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. 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.

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.
- 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.

6.6 Noise and Vibration

Site noise will occur because of the normal movement and manoeuvring of plant and vehicles and baling.

The measures set out in Procedure PR7 will be taken to minimise the risk of noise and vibration nuisance.

6.7 Dusts, Fibres and Particulates

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

6.8 Litter

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

The site will be routinely swept to prevent particle lift-off and is surrounded by fence to prevent light fraction waste escape, if present.

6.9 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.

6.10 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.

6.11 Other Fugitive Emissions

Due to the nature of operations, other fugitive emissions have been risk assessed which 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.
- Fuel / oil tanks and associated transfer pipework will be appropriately designed, sized and installed.
- Vehicles shall be compliant with relevant exhaust emissions standards.

6.12 Complaints

The company's complaints procedure (Procedure PR2) applies to all complaints, feedback and requests made by third parties regarding operational activities.

Complaints are to be investigated immediately by the Site Manager. The nature and details of the complaint will be logged in the Site Diary. 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 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.
- 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.
- 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.

7 REPORTING AND DOCUMENTARY CONTROL

7.1 Documents

As a minimum, all records required by the Standard rules 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.
(d) be retained, unless otherwise agreed with NRW, for at least 6 years from the date when the records were made, or in the case of the following records, until licence surrender.

7.2 Security and Availability of Records

All site records, including the site diary, will be kept at the site office. The records will be sequentially filed and kept secure to prevent loss, damage or deterioration.

7.3 Notifications

NRW shall be notified without delay following the detection of:

(a) any malfunction, breakdown or failure of equipment or techniques, accident or fugitive emission which has caused, is causing or may cause significant pollution.
(b) the breach of a limit specified in the set of Standard Rules.
(c) any significant adverse environmental effects.

Written confirmation of actual or potential pollution incidents and breaches of emission limits shall be submitted to NRW within 24 hours.

NRW shall be notified within 14 days of the occurrence of the following matters:

- the death of any of the named operators (where the operator consists of more than one named individual).
- 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 of them being in a partnership, dissolving the partnership.

7.4 Waste Returns

Each year, within one month of the end of the year, NRW expects operators to submit waste returns documenting waste movements. The return needs to be submitted using the template provided by NRW. The latest version of the waste return template can be obtained from: waste.returns@cyfoethnaturiolcymru.gov.uk

The waste returns reference is :

8 FEES TO NRW

There is an annual subsistence fee payable to NRW. The annual charge is due on demand in the year that NRW issue the permit and then on 1 April each year. The charge starts from the date NRW authorises the permit.

9 EMS AUDIT

The environmental management representative will establish a rolling audit programme that ensures each aspect of the EMS is audited at least annually. More frequent audits will be undertaken on the more sensitive procedures and aspects. The principle aim of the audit will be to determine whether or not the EMS conforms to planned expectations and is being effectively implemented and maintained. The environmental management representative will provide feedback regarding the audit process to management. The audit findings will be recorded.

10 NON-CONFORMANCE, CORRECTIVE & PREVENTIVE ACTION

10.1 Continual Improvement

Through monitoring of performance, the operator will seek to identify non-conformance issues requiring action to ensure continued environmental performance and full implementation of the EMS. The operator will seek to identify non-conformance issues through a variety of means including outcomes of audits, incident reports, reviews of legislation requirements and complaints.

10.2 Investigation of Failings

Following identification of non-conformance issues, the environmental management representative will lead an investigation into the root causes and identify ways in which the issues can be avoided in the future. The review will also aim to identify any ways in which the EMS may be improved. This may require specialist input from internal and external parties. This process will lead to corrective and preventative action plans being developed and tracked.

11 PERMIT SURRENDER

Should the operator wish to surrender the Permit at some point, NRW will need to be convinced that necessary measures to avoid any pollution risk resulting from the waste activities have been taken.

The legal test for surrender is – "that the necessary measures have been taken:–

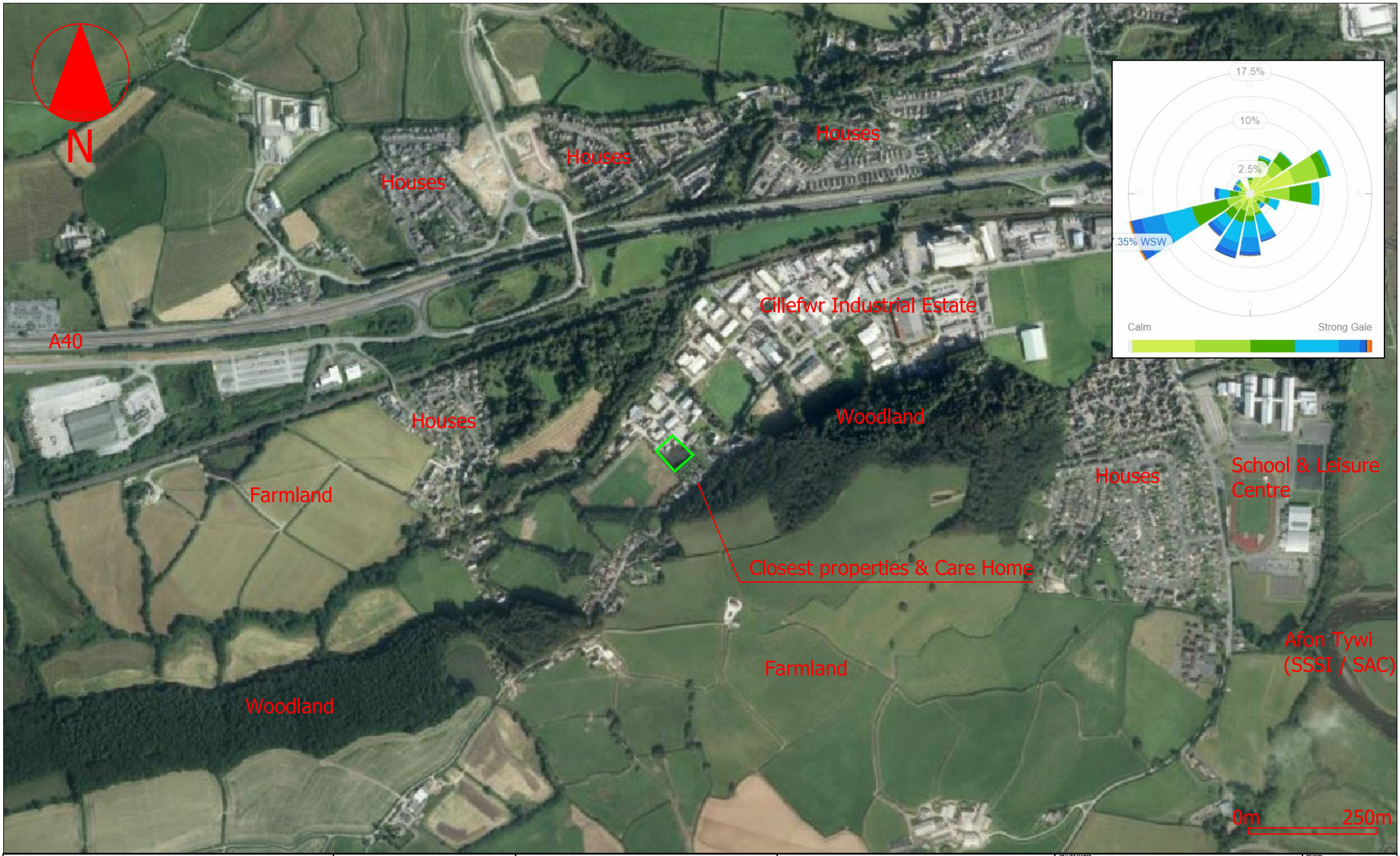
(a) to avoid a pollution risk resulting from the operation of the regulated facility; and
(b) to return the site of the regulated facility to a satisfactory state, having regard to the state of the site before the facility was put into operation."

Provided the site is operated in accordance with the Permit and records are maintained that show waste acceptance and pollution control measures have been implemented, the land quality should not be altered. During operations, PMR will ensure that the relevant records are maintained. This will ensure that several lines of evidence demonstrating the legal test has been satisfied are gathered during operations.

The Site Condition Report will be maintained during the life of the operation and ultimately used during Surrender.

References

How to Comply. Natural Resources Wales.
https://cdn.cyfoethnaturiol.cymru/media/2110/how-to-comply-with-your-environmental-permit.pdf?mode=pad&rnd=131467604540000000



Drawing Number 2161/1	NOTE	CLIENT: TD Tyre Recyclling Ltd	PROJECT: TD Tyre Recycling Facility, Johnstown, Carmarthen	DRAWING NUMBER: 2161/1	REVISION: 0
Legend: TD Tyres site		Rev / Date / Status/Ammendments	TITLE: Aerial Image of Key Features	SCALE: As Shown; DATE: 11.21; DRAWN: BR; CHECKED	

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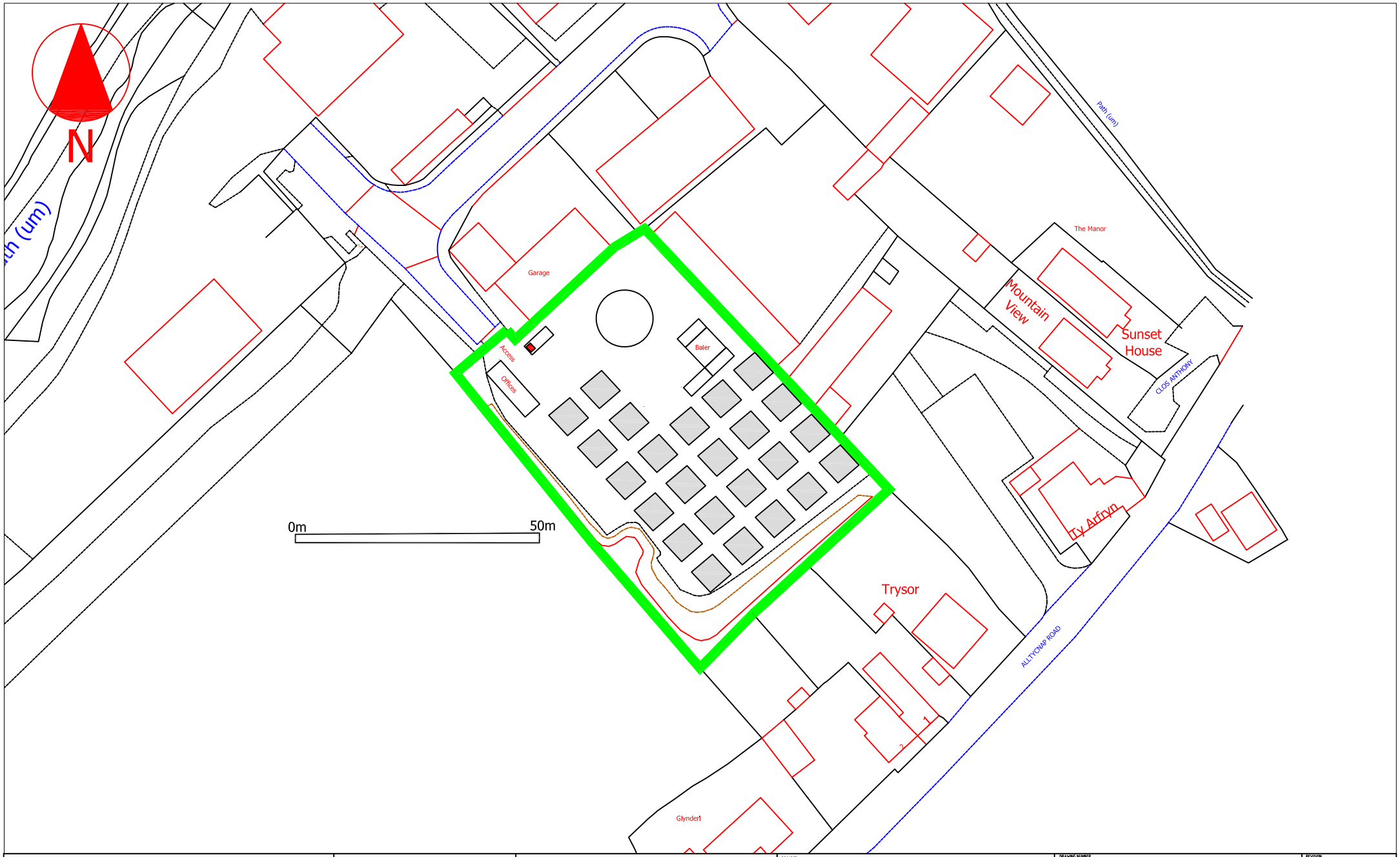

Drawing Number 2161/2	NOTE	CLIENT: **TD Tyre Recyclng Ltd**	PROJECT: **TD Tyre Recycling Facility, Johnstown, Carmarthen**	DRAWING NUMBER: **2161/2**	REVISION: **0**
Legend: TD Tyres site		Rev / Date / Status/Ammendments	TITLE: **Site Layout and Access**	SCALE: **As Shown** · DATE: **11.21** · DRAWN: **BR** · CHECKED	
				Geotechnology, Ty Coed, Cefn-yr-Allt, Aberdulais, Neath, SA10 8HE, 01639 775293, www.geotechnology.net	GEO TECHNOLOGY

TD TYRE RECYCLING LTD
BESPOKE PERMIT

ENVIRONMENTAL MANAGEMENT SYSTEM

Appendix 1
Environmental Permit
Report Number 2161r4v1d1021

TD TYRE RECYCLING LTD
BESPOKE PERMIT

ENVIRONMENTAL MANAGEMENT SYSTEM

Appendix 2
Procedures

Report Number 2161r4v1d1021

PR1. Waste Acceptance Procedure

Pre-acceptance checks

Pre-acceptance checks will be carried out to limit the opportunity of non-confirming waste being delivered. This will be done when TD personnel collect the tyres from customer facilities. Before collecting and taking control of the tyres each tyre will be visually checked as it is loaded onto the collection vehicles. The visual check will be aimed at identifying waste that is not acceptable under the Permit or waste that could pose a risk to the environment e.g. hidden lithium batteries, biodegradable / food waste.

Waste Acceptance

The list of wastes acceptable at the site are set out in the Permit and listed below.

Waste Code	Description
16	**WASTES NOT OTHERWISE SPECIFIED IN THE LIST**
16 01	**end-of-life vehicles from different means of transport [including off-road machinery] and wastes from dismantlingof end-of-life vehicles and vehicle maintenance (except 13,14, 16 06 and 16 08)**
16 01 03	end-of-life tyres

1. On delivery, each tyre will be visually inspected again as they are unloaded and placed into storage prior to baling. Particular attention will be given to potentiallyhidden wastes such as Lithium-ion batteries and food waste.
2. If non-permitted wastes are found or the tyre is NOT as described or is not accepted within the terms of the Permit, it shall be REJECTED. If, in the interests of the environment, it would be best to allow the load to be stored on site, then the waste shall be retained on site in the quarantine skip. Steps taken to safely dispose of the waste (after liaison with NRW) should be documented– typically this will involve returning it to the waste producer.
3. If the waste is acceptable the waste is transferred to the storage area
4. For each deliver the following information shall also be recorded:

    a) Weight of waste / number of tyres
    b) Category/EWC Code of the waste
    c) Site address of waste

- Waste deliveries will typically be recorded electronically.

PR2. Managing and Responding to Complaints

On receipt of a complaint, the recipient shall enter the relevant details onto Complaint Record Form or Site Diary.

The Site Manager should be informed immediately and should be responsible for working out the next steps depending upon the nature of the complaint. The proposed next steps should be communicated to the person who has made the complaint.

The Site Manager will identify if other personnel need to be involved with investigating the source of the complaint or fixing the identified problem.

An immediate visual site inspection and/or sniff test will be conducted where relevant. The aim will be to identify any issues of concern.

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

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

Actions required to prevent the problem re-occurring will be worked out. These will be recorded. The person who made the complaint should be provided with an update on the steps to be taken. All complaints should be logged, either using SF05 and SF06 or the Site Diary.

PR3. Emergency Procedures

An assessment of things that could go wrong and harm the environment has been made and is summarised in table below.

The table describes what it is to be done to reduce the chances of each possibility happening. It also describes what should be done if the worst actually happens. All relevant procedures should be followed.

Personnel should also be familiar with the Fire Prevention and Mitigation Plan.

Possible Accident / Incident	What would the harm be?	How do we reduce the chances of it happening?	What to do if it happens
Spillages			
Spillage during delivery/ recovery of oil or fuel.	Contamination of land, drains, groundwater and watercourses	Supervise fuel deliveries. Use drip trays and spill materials.	Follow the spill response procedure PR4.
Spillages during refuelling of plant and equipment.		Plant and equipment will be refuelled in designated areas with impervious surface and will use drip trays and spill materials.	
Overfilling			
Overfilling of oil / fuel tanks during delivery.	Contamination of land, drains, groundwater and watercourses	Supervise all deliveries	Follow the spill response procedure PR4.
Failure of Plant or Equipment			
Leakages; due to faulty pipe work, valves, over-pressure, blockages, corrosion, severe weather, ground movement etc.	Contamination of land, drains, groundwater and watercourses if outside impermeable areas	Daily visual inspection and completion of weekly inspection checklist record. Preventative maintenance regime. Any underground pipes and tanks will be tested for integrity. Insulation and protection of pipe work.	Follow the spill response procedure PR4.
Puncture; of vessels and tanks etc. due to impact – such as fork lift trucks.		Tanks and vessels generally located within / on secondary containment facilities. Storage locations of drums and non-permanent vessels protected by use of barriers or fencing. Movement of drums and containers using safe techniques.	

Fire (see also Fire Prevention and Mitigation Plan)			
Fire / Explosion	Smoke and pollution, Firewater may cause contamination of land, groundwater And watercourses.	Incorporation of fire breaksinto site layout. No smoking policy. Maintain tidy site and minimize stockpile sizes. Fire training and emergencydrills.	See Fire Prevention and Mitigation Plan
Flood			
Due to ingress of watercourse floodwater, blocked drains, burst watermain, use of fire water.	Site not at significant risk of flooding.		
Vandalism			
Unauthorised entry and tampering or malicious damage to property, plant and equipment.	Contamination ofland, drains, groundwater and watercourses.	Secure gate and perimeterfence. Site locked when un- manned, tanks and valves locked when not in use outof hours. Plant and equipment lockedin secure storage out of hours. Security system installed .	Follow the spill response procedure PR4.

PR4. Dealing with Spillages and Leaks

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 bunded tanks.
- Delivery of fuels and oils will be supervised by a responsible member of staff.
- The quantity of fuel in storage will be checked, either using a visual check, 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, to prevent overfill.
- 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 always for immediate use to soakup 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.

Spillage or Leakage

This can occur during refuelling of vehicles, fuel deliveries, vehicle servicing, vehicle breakdowns, accidents and/ or damage to tanks and bunds. Care should be taken when dealing with any spillage.

All vehicles, plant and equipment used on site will be operated and maintained with the objective of preventing potentially polluting leaks and spillages of wastes or other potentially polluting materials.

Each tank, skip, drum or other container used to hold wastes which consist of or contain fluids or hazardous residual wastes will be:

- Loaded and unloaded in accordance with the handling procedures specified in Table 1
- overleaf.
- Filled and emptied in accordance with the filling and emptying procedures specified in Table 1.
- Clearly labelled regarding its contents.
- Inspected and maintained according to the maintenance schedules and proceduresspecified in Table 1.

In the event of damage or deterioration to a container that is leaking or is likely to cause a leak, that container will be repaired or replaced immediately.

In the event of any leaks or spillages occurring on site documented control and remediation procedures shall be implemented immediately and recorded and shall meet the standards specified in Table 1.

Table 1: Procedure for Prevention and Control of Leaks and Spillages

Action	Specified Standards
Loading and unloading skips, drums and other containers	Loading and unloading of skips, drums and other containers shall be supervised at all times by a member of staff. Lids/caps/bungs or other closures shall be in place during loading/ unloading.
Filling and emptying tanks, drums and other containers	Filling and emptying of tanks, drums and other containers shall be supervised at all times by a member of staff. Lid/caps/bungs and other closures shall be in place at the end of filling. Containers, tanks and drums shall not be filled beyond their operational capacity.Filling and emptying shall be carried out in a bunded area. Measurement of low-level void space shall be by physical dipping or visually checking prior to loading.
Inspection, maintenance,and repair of skips, tanks, drums and other containers	Skips, tanks, drums and other containers shall be inspected daily for leaks. Any fixed tanks found to be leaking shall have their contents immediately transferred to an alternative appropriate tank or container. Any skips, drums and/or other containers found to be leaking shall be either immediately transferred to a larger appropriate over-container or shall have their contents immediately transferred to an alternative appropriate tank or container.
Control and remediation of leaks and spillages	Minor spillages: Cleaned up immediately using sand or proprietary absorbent to clean up liquids and placed in alternative containers. Major spillages: Immediate action shall be taken to contain the spillage and prevent liquid fromentering surface water drains, water courses and unsurfaced ground. The spillage shall be cleared immediately and placed in alternative appropriate containers. NRW shall be informed immediately.

Any liquid spills will be cleared immediately by depositing absorbents on the affected area. Suitable spillage collection facilities including a supply of absorbent material, decanters and cleanser degreasers will be kept on-site to deal with spillages. Spill kits and spillage collection facilities will be clearly signed. Absorbents used to clean spillages will be suitably contained prior to being taken to an appropriately permitted site for disposal.

PR5. Fire Prevention and Mitigation

All personnel need to be familiar with the site Fire Prevention and Mitigation plan.

In the event of a fire the Fire Prevention and Mitigation Plan will be followed. The followingactions should be taken:

1. The person discovering the fire will raise the alarm and evacuate and isolate the area.
2. Use the appropriate fire extinguisher or other firefighting equipment i.e. fire suppression on plant, if the fire can be controlled without endangering themselves or other personnel.
3. Contact the Site Manager/ Supervisor immediately; if the fire cannot be safely tackled the emergency services should be notified (dial 999).
4. All electrical supplies should be isolated and made safe in the area of the fire.
5. Supervisor/ Manager must inform site office to prevent further entry of vehicles onto site if necessary and to direct all persons to the assembly point, which is outside the site entrance adjacent to the Fire Hydrant. The entrance should be cleared of all vehicles.
6. Manager/ Supervisor must appoint a member or members of staff to assist any known disabled persons during the evacuation to the fire assembly point wherever this is necessary,providing the risk to those involved is low.
7. The Site Manager/ Supervisor or next senior person will make a check of all visitors, contractors and staff to make sure everybody is accounted for.
8. The Site Manager/ Supervisor will, if necessary, send a member of staff to the site entrance to direct the emergency services onto site.
9. The Site Manager/ Supervisor or next senior person will liaise with and direct the emergency services to any casualties.
10. All used fire extinguishers should be returned to a supplier for refilling/ replacement.

UNDER NO CIRCUMSTANCES SHOULD USED FIRE EXTINGUISHERS BE RETURNED TO THE FIRE POINT AFTER AN INCIDENT

Full records of all actions taken, and equipment used should be kept and if possible, photographs taken.

PR6. Preventing Noise and Vibration causing Nuisance

Sources of Noise

Noise will occur primarily as a result of the movement of plant and vehicles on site and during use of mechanical baler.

Control Measures

The site is close to residential property, a care home and adjacent commercial property. The following measures will be taken to minimize the risk of noise and vibration nuisance:

- All plant machinery will be subject to regular inspection and maintenance.
- 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
- Waste will not be dropped from height or scraped along the floor unnecessarily with most movements carefully made utilizing grab
- Staff to avoid unnecessary revving of engines

Inspections

To ensure that abnormal site conditions are identified that could potentially cause off-site nuisance, any change to on-site noise levels will be identified by site operatives and management. This will initially be done by subjective on-site assessment of noise levels based on experience and familiarity. As increased or altered noise (i.e. noise levels or types of noise not normally heard) could be indicative of failure of a control measure the cause will be immediately investigated.

Complaints

Complaints are never a substitute for site inspections and effective waste management practices, but they do offer a valuable indicator of potential offsite problems related tothe site activity. For this reason, all complaints will be logged and documented.

Any complaints received will be promptly investigated and appropriate remedial actiontaken, where feasible.

PR7. Dealing with litter

As the waste to be stored and baled is tyres there is little prospect of litter being directly released to the environment from the permitted activities.

To ensure litter generation remains a low risk the following measures will be taken:

- Light waste fractions will be stored correctly and away from drafts and site entry / exit points.
- If litter is found on the site yard or immediate access road this will be removed and appropriately disposed / recycled.

PR8. Preventing dust problems

There is little prospect of dust being released to the environment from the permitted activities.

To ensure dust generation remains a low risk the following measures will be taken:

- Minimising drop heights of potential dusty wastes when transferring and loading
- Sweeping of work areas and site yards.
- Visually checking loads leaving the site for dust generating materials
- Minimising vehicle speeds in the yard

Where airborne material is persistently observed to be a problem the following actions will be considered:

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

PR9. Dealing with pests

The nature of the waste and the inspection procedures in place will limit the possibility of animal by-products and food waste that attract pests being received at the site.

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

- Waste inspected 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.

PR10. Dealing with odour problems

The nature of the waste and the inspection procedures in place will limit the possibility of odorous wastes being received at the site.

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

- Waste inspected before accepting to identify potential contaminants.
- Quarantine odorous wastes and removal off-site within 72 hours.
- Sniff monitoring for odour performed daily
- Good housekeeping and regular inspection of mess facilities.

In the event of an odour problem the following measures will be implemented:

- Suitable treatment will be implemented either by employees or by suitable contractors.
- Any waste identified as generating the odour shall be isolated and removed from site.

PR11. Dealing with mud on roads

The site is located on an industrial estate served by a tarmacadam road. This results in limited opportunity for mud generation.

If mud on site roads is a significant problem mechanical sweeping will be undertaken.

PR12. Accident and Injury

Vehicle Accident

In the event of an accident involving any item of plant or vehicle, the person first becoming aware of the incident must immediately check for casualties.

Any spillage will be dealt with as in PR4. Immediate action will include -

Vehicle Damage

1. Check for casualties.
2. If there are any casualties the First Aider must be summoned, and the emergency services called.
3. Check for immediate danger and give first aid (if trained and safe to do so)
4. The plant item or vehicle must not be moved, unless to remove casualties, until the Site Manager has assessed the situation and obtained any evidence as to the cause.

The accident details should be noted in the Site Diary. The Site Manger will carry out an investigation filling in the appropriate forms and initiate any corrective action.

All accidents and near misses must be reported no matter how trivial as per the Accident/ Incident and Emergency Procedure

Notifiable Personnel Injury

If any person at the site suffers a serious personal injury the First Aider or Senior person on site will telephone the emergency services if necessary and arrange for the casualties to be dealt with as appropriate. The Accident book will be filled in and kept up to date with any subsequent information about the casualty.

Accident/ Injury

1. Remove casualties from immediate danger
2. If injuries are serious Dial 999 and ask for an ambulance - follow the instructions given
3. Summon the first aider
4. Do not move any plant or equipment involved other than to rescue casualties
5. Inform your supervisor/ line Manager immediately
6. Contact the Manager
7. Record details in accident book

Electrical Incidents

1. Isolate supply and/ or casualty,
2. **Do not touch anything until supply is isolated.**
3. Summon Help / Call emergency services (dial 999)
4. Give first aid if it is safe to do so.
5. Inform your supervisor/ line Manager immediately

PR13. Preventative Maintenance Plan

Following an assessment of all items of plant and site infrastructure, a Preventative maintenance Plan will be implemented that sets out measures to be in place for those items whose failure could lead to environmental impact. The programme is implemented through documented checks and inspections.

Preventative maintenance is regularly performed to reduce the likelihood of the item failing or requiring unplanned replacement or maintenance. Preventative maintenance is performed while the equipment is still working, so that it does not break down unexpectedly.

The maintenances schedule below outlines the frequency that key parts of the site and items of plant and equipment are to be checked and maintained. Each item will be provided with a bespoke detailed checklist in accordance with the manufacturer's instructions, where relevant. At all times however consideration should be given to**: level of wear and tear, the need for lubrication, signs of overheating and performance of silencers.**

IF ANY DEFECTS ARE NOTED THAT POSE A RISK TO HUMAN HEALTH OR THE ENVIRONMENT SENIOR MANAGEMENT SHOULD BE INFORMED IMMEDIATELY

PR14. Training needs assessment

PERSONNEL NAME	TRAINING REQUIRED (tick boxes to show who needs which training)													COMMENTS
	Environmental awareness							Maintenance/ operations			Accidents and emergency			
	Certificate of Technical Competence	Regulatory requirements	Reporting procedures to inform supervisors of deviation from Permit	Waste receipt inc Duty of Care	Waste separation and storage	Awareness of local environment	Awareness of potential environmental impacts from operations	Tyre baling	Refuelling	Hardstanding and drainage infrastructure	Spill response procedure	Flood procedure	Failure of services	

PR15. Use of subcontractors

Actions to be taken

This procedure is to ensure that an appointed approved subcontractor selected to undertake a task is controlled during works and that they are made aware of the health, safety and environmental requirements when working for TD.

All subcontractors shall be required to comply with this procedure as a condition of their contract. All Subcontracted Staff will ensure:

a. Their employees are familiar with the work site and are aware of all hazards.
b. Comply with the Health and Safety at Work etc. Act 1974 and all other relevant health and safety legislation applicable to the work being undertaken.
c. Comply with TD Health and Safety Rules and Safety Policy and shall have made full provision in the tender for such compliance.
d. Conduct their activities in accordance with established safe practices e.g. guidance notes, codes of practice, and take reasonably practicable precautions to protect the work site, all employees and others who may be affected by our works.
e. Provide a Risk Assessment and Method Statement for contracted works in advance.

Subcontractors will:

a. Only use skilled, experienced and competent people in the execution of their duties on behalf of TD
b. Provide their employees with suitable protective clothing at their (the contractors) expense.
C. Keep their employees within the designated work areas at all times unless stated.
d. Ensure their employees submit to any security checks where required.

The following procedure shall be followed:

Pre Start Contract Meeting
The Contracts/Project Manager shall hold a pre-start contract meeting where the outline details of the contract shall be discussed and agreed.

Health & Safety Induction
All subcontractor personnel shall attend an TD Health & Safety Induction prior to start of work.

Accident / Incidents
All accidents / incidents shall be reported to the TD management team on site immediately. The subcontractor shall also be responsible to provide a written report and if necessary attend any meetings that may be called in regards to the event.

PR16 Non-compliance

Non-**compliances** may be identified at any time and during audit. These should be recorded and corrective action plans developed, such as that below, to ensure the non-conformances are controlled and not repeated.

Non-Conformance No:	Raised by:	Position:	Date:
Details :			
Agreed **corrective/preventive action** Completed by		Date	
Management comments Signed		Date	

All Non-conformances Should Be Discussed At The Next Management Review Meeting

Review Meeting Date	Non Conformance discussed	Action Agreed	Signed (Meeting Rep.)
Comments			

PR17 EMS Audit

To ensure that all aspects of the EMS are being implemented, TD will introduce a rolling audit of all procedures and aspects. This will be set out in a format such as that shown below.

Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Procedure to be Audited

TD TYRE RECYCLING LTD
BESPOKE PERMIT

ENVIRONMENTAL MANAGEMENT SYSTEM

Appendix 3
Forms

Report Number 2161r4v1d1021

FORM TITLE	**Preventative Maintenance Programme**
Date	**September 2021**

Preventative maintenance is regularly performed to reduce the likelihood of the item failing or requiring unplanned replacement or maintenance. Preventative maintenance is performed while the equipment is still working, so that it does not break down unexpectedly.

The maintenances schedule below outlines the frequency that key parts of the site and items of plant and equipment are to be checked and maintained. Each item will be provided with a bespoke detailed checklist in accordance with the manufacturer's instructions, where relevant. At all times however consideration should be given to**: level of wear and tear, the need for lubrication, signs of overheating and performance of silencers.**

IF ANY DEFECTS ARE NOTED THAT POSE A RISK TO HUMAN HEALTH OR THE ENVIRONMENT SENIOR MANAGEMENT SHOULD BE INFORMED IMMEDIATELY

Item of Plant/ Part of site	Detailed Checklist Reference	Daily	Weekly	Monthly	Quarterly	Six monthly	Annually
Baler							
Access gates							
Site surfacing							
Fuel storage tank							
Oil storage area							
Perimeter bund							

FORM TITLE	**Training Record**
Date	**September 2021**

Name	**Date employment commenced**
	Job Title

Course Title	Authorisation by	Date of Authorisation	Date training Completed	Initialled by trainer
EXTERNAL TRAINING				
INTERNAL TRAINING				
Permit requirements				
Regulatory requirements				
Key items of plant				
Reporting procedures				
Accident response				

Qualifications gained in this employment and Expiry Date

Training needs

FORM TITLE	**Site Inspection Form**
Date	**September 2021**

Use this form or Site Diary at any time to record the performance of the site. Completion of this form on a regular basis will assist with early identification of aspects requiring improvement and potentially prevent incidents occurring. Taking photographs on a regular basis will also help assess site conditions.

IF ANY ASPECT IS OF THE SITE OPERATION IS FOUND TO BE POSING A RISK TO HUMAN HEALTH OR THE ENVIRONMENT THEN A MANAGEMENT REPRESENTATIVE SHOULD BE INFORMED IMMEDIATELY

Date:	**Inspected By:**	**Outdoor Weather:**
What activities are occurring during the inspection?		
Observations and actions required should be recorded below. If there are no issues of concern 'OK' can be used. **Before completing this form please review the previous inspection record to check if any actions should have**		
Area of Site Inspected	**ISSUES OF CONCERN:** Important factors to consider during the visual inspection of any part of the site should include: **security, vandalism or damage, odours, leaks, presence of nuisance dust and noise, presence of pests such as vermin/birds/insects, litter, fire hazards, integrity of surfacing, safety of traffic movements and maintenance requirements.**	
Site exterior		
Access and Exit Points		
Waste Receipt Area		
Surfacing		
Fire Fighting Equipment		
Actions Required or Additional Notes:		

FORM TITLE	**Accident and Incident Record**
Date	**September 2021**

Date and time of the incident	
What happened, what was it about?	
Was anyone else aware of this – other witnesses? If so who?	
What caused it?	
What action did you take to fix the problem? Were external agencies involved?	
What have you done to make sure that it does not happen again?	
Was there any significant pollution – for example: oil entering a surface water drain. If so what?	
If there was then notify NRW on 0300 065 3000.	Time: Date: NRW Incident number:
Please print name and sign	

FORM TITLE	Recording Complaints
Date	September 2021

This form or the Site Diary should be used to record the following information:

Name and Address of complainant:		Tel: Fax: E-Mail: Mobile:	
Date Complaint Received	**Written or Verbal**	**Date Complaint Rectified**	**Written or Verbal**
Nature of Complaint			
Remedial Action			
All complaints should be discussed at the next management review meeting			
Review Meeting Date	**Complaint Discussed**	**Action Agreed**	**Signed (Meeting Rep.)**
Comments			

FORM TITLE	Customer Complaint Log
Date	September 2021

Complaint No.	Name and Nature of Complaint	Date of Complaint	Date Rectified	Signed Off By

TD TYRE RECYCLING LTD
BESPOKE PERMIT

ENVIRONMENTAL MANAGEMENT SYSTEM

Appendix 4
WAMITAB Certificates

Report Number 2161r4v1d1021

wamitab

Qualification Title:

WAMITAB Level 4 Diploma in Systems and Operations Management: Small Scale Operations

Qualification Accreditation Number:

600/8103/X

This Certificate is awarded to

Thomas Davies

Verification date: 25/09/2019
Authorised:

Chris James
WAMITAB Chief Executive Officer

Learner ID: 101762
Certificate No.: 5150682
Date of Issue: 25/09/2019

30783173-33A7-456F
87A8-E83C324C505C
AuthentiQual.com

Regulated by Ofqual
For more information see http://register.ofqual.gov.uk

Corff dyfarnu cydnabyddedig
Cymwysterau Cymru Qualifications Wales
Recognised awarding body

cea Regulation

The qualifications regulators logos on this certificate indicate that the qualification is accredited only for England, Wales and Northern Ireland. Qualifications Wales regulates this qualification where it is awarded to learners assessed wholly or mainly in Wales.

00135229

Credit certificate
This certificate determines credit awarded to:

Thomas Davies

Units gained:

		Credit Value	Credit Level
L/602/2077	Ensure responsibility for actions to reduce risks to health and safety	4	L3
H/601/6687	Conduct a health and safety risk assessment of the workplace	6	L3
M/600/9662	Work productively with colleagues and stakeholders	6	L5
M/600/9676	Support learning and development within own area of responsibility	5	L4
K/600/9711	Manage physical resources	3	L4
T/500/4601	Recruit people for your business	3	L3
L/602/0538	Maintain protection of the environment in facilities used for the processing or storage of recyclables and other materials	5	L4
D/505/9110	Getting the best out of staff in a business	3	L3
K/602/1423	Procedural compliance	6	L4
T/504/7304	Monitor and maintain the quality of treatment processes in an energy and utilities environment	12	L4
Y/602/1062	Provide leadership in area of responsibility	20	L5
A/600/9695	Manage a budget for own area or activity of work	7	L5
L/602/0555	Manage systems for responding to emergencies during recycling activities	4	L3
F/602/0553	Identify and implement improvements to recycling activities	10	L4
R/504/7309	Manage the transfer of outputs and disposal of residues from treatment and recovery operations in the waste industry	12	L4

Verification date: 25/09/2019

Authorised:

Learner ID: 101762

Certificate No.: 5150682

Date of Issue: 25/09/2019

Chris James
WAMITAB Chief Executive Officer

Regulated by Ofqual
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00135230

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