

ENVIRONMENTAL PERMIT APPLICATION

Operating Techniques

Prepared for: Tip Top Toilets Limited

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APPENDICES

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Appendix OT3	Weekly Monitoring Checks
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REFERENCED DRAWINGS

DRAWING 001	Site Location Plan
DRAWING 002	Environmental Permit Boundary, Site Layout and Drainage
DRAWING 003	Sources, Pathways and Receptors
DRAWING 004	Cultural and Natural Heritage

1.0 Introduction

SLR Consulting Limited (SLR) has been instructed by Tip Top Toilets Limited (Tip Top Toilets) to prepare an Operating Techniques (OT) report in support of an application for a new bespoke Environmental Permit (EP) for the Tip Top Toilets Fedw Hir Eco Centre Waste Transfer Station (WTS), hereafter referred to as 'the Site'.

This Operating Techniques document should be read in conjunction with the rest of this application which comprises:

- Application Forms Parts A, B2, B4 and F1 and Supporting Information;
- Non-Technical Summary (SLR Ref: 402.07841.00001/NTS);
- Site Condition Report (SLR Ref: 402.07841.00001/SCR); and
- Environmental Risk Assessment (SLR Ref: 402.07841.00001/ERA).

The site location is detailed on Drawing 001. Drawing 002 illustrates the proposed permit boundary and layout of the site. The site's environmental context is illustrated on Drawings 003 and 004.

1.1 Site Location

The Site is centred on National Grid Reference SN 99357 06198, and located at Fedw Hir, Llwydcoed, Aberdare, CF44 0DX. The Site is approximately 4.5km west of the conurbation of Merthyr Tydfil and the surrounding area is predominantly open and agriculture land.

The location of the site is illustrated on Drawing 001, whilst the site boundary and layout is visible on Drawing 002. The Environmental Site Setting is illustrated in Drawings 003 and 004.

1.2 Report Structure

This report describes the operating techniques that will be implemented at the facility to ensure compliance with the conditions of the Environmental Permit. The report has been drafted to satisfy the requirements of Environment Agency (EA) Guidance, including SGN 5.06 where appropriate, and is divided into the following Sections:

Section 1	Introduction
Section 2	Management
Section 3	Operations
Section 4	Emissions and Monitoring
Section 5	Information
Section 6	Closure

1.3 Document Revision History

Any changes to the Operating Techniques document will be labelled in the below table in chronological order.

<i>Version</i>	<i>Reason for Revision</i>	<i>Date of Revision</i>	<i>Signature of Site Manager</i>
1.0	First Version of Document Finalised and Released		

2.0 MANAGEMENT

2.1 Management System

The EP requires the operator to have a management system. This set of written procedures describes what will be done to minimise the risk of pollution from the activities covered by the EP and includes a level of detail which is proportionate to the risks and complexity of the site.

Tip Top Toilets operate their own management system which will ensure:

- that the risks that the activities pose to the environment are identified;
- that the measures that are required to minimise the risks are identified;
- that the activities are managed in accordance with the management system;
- performance against the management system is audited at regular intervals; and
- compliance with the EP.

The management system will be supplemented by this document which outlines the proposed operating techniques at the site and demonstrates conformance with the requirements of relevant and published NRW Guidance. The management system is subject to continual review in response to significant changes to the activities, accidents or non-compliance.

2.2 Management Structure and Responsibilities

The Site Manager will be responsible for day to day operations and compliance with the EP.

Whenever the site is open to receive wastes, dispatch wastes or carry out any of the waste management operations, it will be supervised by at least one member of staff who is suitably trained and fully conversant with the requirements of the permit relating to:

- waste acceptance and control procedures;
- operational controls;
- maintenance;
- record-keeping;
- emergency action plans; and
- notifications to NRW.

The management structure, responsibilities and resources is sufficient to ensure that the site operates efficiently in accordance with site rules and operating procedures and that the conditions of the EP are met.

2.3 Technical Competence and Training

The site will be managed by sufficient staff, competent to operate the site. The management system will deliver the following:

- all staff will have clearly defined roles and responsibilities;
- records will be maintained of the skills required for each post;

- records will be maintained of the training and relevant qualifications undertaken by staff to meet the requirement of each post; and
- operations will be governed by standard operating instructions.

Operations at the site will be under the overall control of a technically competent person who holds the relevant Certificate of Technical Competence (CoTC) under the Waste Management Industry Training and Advisory Board (WAMITAB) scheme.

Michael Rees will carry out an EPOC training course, as detailed in Appendix OT6 prior to obtaining full WAMITAB certification.

An assessment of staff training needs will be carried out to identify the posts for which specific environmental awareness training is needed, and to determine the scope and level of such training. The assessment of training needs will be reviewed on an annual basis.

The training programme will ensure that relevant staff are aware of the following:

- regulatory implications of the permit for the site and their specific work activity;
- all potential environmental effects from operations under normal and abnormal circumstances;
- the need to report deviations from the permit; and
- prevention of accidental emissions and the action to be taken should accidental emissions occur.

2.4 Site Security

The site is within a rural and remote location. There are a limited number of neighbouring properties and the access road is not considered a through road, minimising traffic past the site. Fencing is in place at the site boundary.

The site will be inspected at the commencement of each working day. Any defects or damage which compromises the integrity of the enclosure will be made secure by temporary repair by the end of the working day. Permanent repairs will be affected as soon as practicable.

All inspections, any defects, damage or repairs will be recorded in the site diary.

2.5 Permit Surrender

2.6 Display of Environmental Permit

A copy of the EP will be kept available for reference by all staff and contractors whose work may have an impact on the environment.

2.7 Managing Documentation and Records

Controls will be in place to ensure that all documents are issued, revised and maintained in a consistent fashion.

The documents that will be included within the scope of the controls are as follows:

- policies;
- responsibilities;
- targets;

- maintenance records;
- procedures;
- monitoring records;
- results of audits;
- results of reviews;
- complaints and incident records; and
- training records.

Operational records will be made and kept up to date on a daily basis. All records relating to waste acceptance will be maintained and kept readily available on-site for a minimum of two years.

2.8 Reporting Non-Compliance and Taking Corrective Action

Procedures will ensure appropriate corrective action is taken in response to problems identified at the site. The procedures will ensure that non-conformances are reported, investigated and rectified, and that failures and weaknesses are prevented. The following aspects will be considered:

- actual or potential non-compliance;
- system failure discovered at internal audit;
- suppliers or subcontractors breaking the agreed operating rules;
- incidents, accidents, and emergencies;
- malfunction, breakdown or failure of plant;
- other operational system failure; and
- complaints.

The action taken in response to the non-conformance may include:

- obtaining additional information on the nature and extent of the non-conformance;
- discussing and testing alternative solutions;
- modifying procedures and responsibilities;
- seeking approval for additional resources and training; and
- contacting suppliers and contractors (as applicable).

2.9 Auditing and Legal Compliance

There will be a formalised internal auditing procedure (included as Appendix OT5) to ensure the facility is audited at defined intervals and that the progress of corrective and preventative action is monitored.

2.10 Monitoring, Measuring and Reviewing Environmental Performance

A formalised management structure will review environmental performance, and ensure any necessary actions are taken.

2.11 Operational Control, Preventative Maintenance and Calibration

The management system will complement operational procedures so as to ensure effective control of site operations, the use of approved suppliers and contract services, the maintenance of operational equipment and the calibration of monitoring equipment.

All plant and equipment will be subject to a programme of planned preventative maintenance which will follow the inspection and maintenance schedule recommended by the manufacturer.

2.12 Design and Construction Assurance

All elements of the site not yet constructed will be designed and built in accordance with recognised standards, methodologies and practices. Construction Quality Assurance (CQA) will be in place for all future construction activities.

2.13 Accident Management Plan

Tip Top Toilets recognises the importance of the prevention of accidents that may have environmental consequences and that it is crucial to limit those consequences.

An accident management plan will be implemented and maintained at the site to ensure the site and site staff are fully prepared for any such incidents. The accident management plan will be reviewed at least every four years or as soon as practicable after an incident, with changes made accordingly to minimise the risk of occurrence.

The following accident management plan describes the techniques that will be implemented to minimise the risks posed to the environment. Activities affecting the health and safety (H&S) of operatives, contractors and visitors will be separately managed in compliance with H&S regulations and company H&S Policy.

2.14 Hazard Identification

The following hazards have been assessed within in the Environmental Risk Assessment (ERA) that has been prepared using the appropriate NRW and EA methodology and has been submitted in support of this permit application (reference 402.07841.00001/ERA, dated May 2017):

- odour;
- unauthorised waste;
- fire;
- loss of containment - spillage and leakage;
- security and vandalism; and
- flooding.

The following sections summarise the measures necessary to minimise the potential causes and consequences of accidents, as detailed in the ERA.

2.14.1 Unauthorised Waste

Acceptance of unauthorised materials could result in unacceptable wastes being stored at the site. Given the nature of the business and method by which waste will arrive on site, i.e. via Tip Top Toilet own vehicles, it is considered that the risk of unauthorised waste acceptance on site is negligible.

Full details of waste acceptance and pre-acceptance measures and procedures are included in Section 3.4 below.

2.14.2 Fire

The site will not accept or store any flammable wastes on site.

A number of chemicals are used as part of the business which will be added to the units before they are hired, and return mixed with the waste. Chemicals added to the units are as follows:

- Safechem Research 50AD for luxury trailer units
- Safechem one shot for all portable toilets

The full list of chemicals held on site, and data sheets for those above are included within Appendix OT1.

In order to minimise the risk of fire:

- fire extinguishers will be provided in all buildings located on the site as well as all waste and non-waste storage areas;
- spill Kits will be distributed across the site to contain and mop up potentially flammable materials such as diesel;
- smoking will be permitted within designated areas on site, sited away from combustible material and ignition sources; and
- no burning of material will take place on site.

In the event of a fire, the following action will be taken:

- the Site Manager and Fire Brigade will be notified immediately and NRW as soon as practicable;
- the burning area will be isolated and attempts will be made to extinguish the fire utilising the on-site fire extinguishers if safe to do so; and
- the site and buildings will be evacuated.

2.14.3 Loss of Containment

Loss of containment could lead to spillage and leakage of potentially contaminating liquids. To prevent loss of containment and minimise the risk and impact of releases the following measures will be implemented:

- *containment system*: any facilities for the storage of fuels will be sited above ground on impervious bases and surrounded by impervious bund walls. The volume of the bunded compound will be at least the equivalent to 110% of the capacity of the tank. All filling points, vents and gauges will be located within the bund or above spill mats;
- *chemical storage*: chemicals stored on site will be within a dedicated storage shed, correctly labelled and the MSDS held within a file on site;
- *storage vessels*: storage tanks will be constructed to be fit for purpose and labelled as to their contents;
- *spill kits*: materials suitable for absorbing and containing minor spillages will be maintained on-site;
- *inspection*: tanks will be inspected visually on a weekly basis by the site staff to ensure the continued integrity of the tanks, and identify the requirement for any remedial action; and
- *monitoring techniques*: the site staff will undertake weekly monitoring for evidence of spillage and leakage.

In the event of any potentially polluting leak or spillage occurring on-site, the following action will be taken:

- minor spillages will be cleaned up immediately, using sand or proprietary absorbent. The resultant materials will be placed into containers and will then be removed from site and disposed of at a suitably permitted facility. The incident will be logged in the site diary.
- in the event of a major spillage, which is causing or is likely to cause polluting emissions to the environment, immediate action will be taken to contain the spillage and prevent liquid from entering surface water and minimise soakaway. The spillage will be cleared immediately and placed in containers for off-site disposal. NRW will be informed.

2.14.4 Security and Vandalism

The following security measures will be in place:

- *site perimeter*: the site benefits from its remote location, limited number of neighbouring properties and no major thoroughfare past the site. Security fencing and areas of dense vegetation is in place around sections of the site which will discourage unauthorised access.
- *security gates*: the site gate will be locked when the site is unmanned and not in use;
- *inspection*: security measures on site will be inspected regularly by the operations staff to identify deterioration, damage or the need for any repairs;
- *maintenance and repair*: any security measures will be maintained and repaired to ensure their continued integrity. In the event that damage is sustained, effective repairs will be made by the end of the working day. If this is not possible, suitable measures will be taken to prevent any unauthorised access to the site. Permanent repairs will be affected as soon as practicable;
- *authorised access system*: all visitors to the site will be required to register in the visitor's book and sign out again on exit to minimise the risk of unauthorised visitors being present on-site; and
- *monitoring techniques*: operational procedures, including regular inspections of security infrastructure, will ensure continual monitoring of security provision at the site.

In the event of a breach of security at the site, the cause will be investigated and appropriate mitigation measures implemented. Records to be maintained include inspections and maintenance of security fencing and the gate, breaches of security, investigations and actions taken.

2.14.5 Flooding

The Nant y Faeldref conjoins with the Nant y Gwyddel approximately 30m to the north east of the proposed boundary. The Nant y Gwyddel then continues to flow to the east of the site. A further tributary, the Cwm Cae'rodyn flows approximately 170m to the west before also joining the Nant y Gwyddel.

The NRW long term flood risk map reveals that the sites south-eastern corner is at low risk of flooding from surface water.

Should flooding become an issue, a flood plan will be implemented.

3.0 OPERATIONS

3.1 Process Description

The site will hire out welfare facilities (toilets, showers and welfare units) for private and commercial events and to the construction industry within the local area.

Upon cessation of the hire, Tip Top Toilets will collect the units and transport them via their own vehicles back to the proposed site. Upon arrival at the site the units contents will be emptied into either a tank or into an IBC, under the European Waste Catalogue (EWC) code 20 03 04. The tank and any IBC's will be contained within Waste Storage Area 1¹ as shown on Drawing 002. Once fully emptied, the units will be washed down, disinfected and then stored on site, in a designated area, prior to re-hire.

The site will wash down each unit between hire, this wash down utilises a steam cleaner, jet wash, water and additional chemicals as detailed in Appendix OT1.

The wash down occurs at the location shown on Drawing 002. The dimensions of the wash bay are 15m x 9m. It will be accompanied by a 2000 litre (L 91x W 70x H 16) above ground septic tank which will be adjacent to the wash bay within a bunded tank capable of holding 110% of the capacity of the tank. The septic tank will be emptied as required.

All infrastructure is subject to a weekly inspection to ensure it remains fit for purpose.

The bund will be kept clear of rainwater as required. Should a spill occur, the liquid will be pumped out and transferred to either an IBC or the tank within the bunded area.

The bulked up waste will be kept on site prior to tankering off site to a suitably licenced facility for disposal / recovery.

The site is a non-hazardous WTS for the storage of one waste type. No treatment of this waste will occur on site.

3.2 Permitted Activities

The activities that will be carried out at the site as defined under Annex II of the Waste Framework Directive can be summarised as follows:

- R13: Storage of wastes consisting of materials intended for submission to any operation numbered R1 to R12, but excluding temporary storage, pending collection, on the site where it is produced;

3.3 Permitted Types, Quantities of Waste and Storage Duration

The site will accept up to a total of 1,500,000 litres of waste per annum arising from the acceptance and cleaning of mobile welfare facilities and waste water generated from the wash-down of units.

Currently, Waste Storage Area 1 can contain a maximum of 28.8 m³ within the bunded area. As fully detailed within the Non-Technical Summary, it is envisaged Waste Storage Area 2 will be developed in the near future which will double the storage capacity at any one time on site to 57.6 m³.

Storage will be within either the purpose built tank (s) or IBC's sited within the engineered bunded area, as shown on Drawing 002.

¹ Waste Storage Area 1 is currently in use, however, a second area as marked on Drawing 002 will be developed in the future.

No hazardous wastes are proposed to be stored or treated on site.

The tank and IBC's will be housed within an engineered bunded area capable of containing 110% of the container (s) capacity.

3.4 Waste Acceptance

3.4.1 Hours of Operation

Due to the nature of operations on site, the hours of operation can be seasonal and ad hoc.

Average office and operational hours are primarily within 07:30 to 17:00, however later deliveries to site are possible.

3.4.2 Waste Control

Waste will be brought onto site within Tip Top Toilet's own vehicles and subject to waste acceptance procedures: including visual inspection and basic characterisation:

- only Tip Top Toilet vehicles will transport waste into site;
- as waste is transferred, a basic characterisation will be carried out to ensure no non-conforming waste is present;
- any accidental acceptances of unauthorised waste will be rectified immediately, with the waste isolated within an IBC, appropriately stored and labelled, recorded within the site diary and removed from site as soon as practicable; and
- records will be kept of waste acceptances and any non-conformances.

3.4.3 Waste Quarantine Procedures

Given the nature of the waste proposed to be stored on site, and the means by which it will arrive on site (via Tip Top Toilet's own vehicles), it is considered a negligible risk exists for any non-conforming waste arriving on site.

Should non-confirming waste be found after units have arrived back on site, the waste will be emptied into an IBC and kept separate and labelled as such. Non-conforming wastes will be removed from site as soon as reasonably practicable and NRW informed as required should additional assistance be needed.

3.5 Site Infrastructure and Equipment

3.5.1 Site Identification Board

A site board will be displayed at the main site entrance and will be easily readable during daylight hours.

The board will display the following information:

- site name and address;
- permit holder;
- permit number;
- emergency contact name and telephone number;

- NRW national telephone numbers; and
- days and hours site is open to receive waste.

The board will be inspected at least once per week. In the event of damage or defect that affects the legibility of the board it will be repaired or replaced within a timescale agreed with the EA.

3.5.2 Plant and Equipment

The following items of plant and equipment will be used at the site:

- Counterbalanced fork truck
- Telescopic handler

All items of plant and equipment will be regularly inspected and maintained in accordance with the manufacturer's specifications as necessary.

4.0 EMISSIONS AND MONITORING

The Site Manager will carry out weekly monitoring checks of the site, as detailed in Appendix OT3.

4.1 Point Source Emissions

Due to the nature of the operations on site, there will be no point source emissions to air, surface water, groundwater or land.

4.2 Fugitive Emissions

4.2.1 Surface Water and Groundwater

The site will be operated such that no point source emissions to surface water or groundwater shall occur.

4.2.2 Sewer

There is no mains sewer connection on site. Welfare facilities on site are treated via an existing packaged treatment plant (Klargester) prior to being discharged to soakaway.

4.3 Engineered Containment

The site infrastructure is illustrated on Drawing 002.

Areas of hardstanding and impermeable surfacing shall be maintained such that the working surface will:

- remain even;
- not be subject to settlement or differential settlement;
- not be subject to rutting by vehicles even when wet;
- have sufficient durability to allow cleaning, for example, by scraping; and
- Remain free of standing water.

All operational areas will be inspected to ensure the integrity and fitness for purpose of their construction is maintained at all times.

4.3.1 Containment Bunding

The waste tank and IBCs will be located within a bunded area. The bund has been built to technical standards laid out in Appendix OT2.

In accordance with Best Available Techniques the contained area will:

- be impermeable and resistant to the stored materials;
- have no outlet, and drain to a blind collection point;
- have pipework routed within bunded areas with no penetration of contained surfacing;
- be designed to catch leaks from tanks or fittings;
- have a capacity greater than 110% of the largest tank or 25% of the total tankage (whichever is greater);
- be subject to regular visual inspection.

4.4 Odour

Waste will remain generally enclosed throughout transfer and containment at the site, with limited exposure to air. All storage will be within sealed containers / tank within a weatherproof building. Waste is sucked out of the units directly into the containment container / tank. Removal of waste from site is via a sealed pump from the container / tank to the tanker.

The addition of chemicals to the sewage waste reduces biological formation of odour further limited the risk on site.

Odour is not expected to pose a significant risk, however ongoing olfactory monitoring by site staff will ensure that odour does not become a risk on site, or significant levels of odour are leaving the boundary of the site. Monitoring will be recorded within the checklist, as detailed in Appendix OT3.

4.5 Dust

The EWC code accepted on site, 20 03 04, is not inherently dusty. As such it is considered that dust will not pose a significant risk on site and no specific management measures are considered necessary.

4.6 Noise

The site is located within a remote area with limited sensitive receptors.

All equipment will be maintained and operated in accordance with manufacturer's guidance and will be maintained in good working order.

Due to the nature of the site and the minimal vehicular traffic and equipment use employed, it is expected that noise levels on site will be minimal.

The site will be operated so as to minimise noise emissions from the site. Measures that will be taken at the site include:

- all plant and vehicles will be switched off when not in use;
- the imposition of a speed limit for vehicles delivering waste to the site. This will reduce noise associated with high engine speeds;
- all site personnel will be trained in the need to minimise site noise, and will be responsible for monitoring and reporting excessive noise when carrying out their everyday roles;
- all plant and equipment in use at the site will be regularly maintained to minimise noise resulting from inefficient operation of pumps and generators;
- in the event that reversing alarms are found to give rise to complaints, alternative alarms or technology will be investigated;
- the regular maintenance of roads and site surfacing to prevent the development of potholes will significantly reduce noise generated;
- if appropriate, consideration will be given to the fitting of noise suppression kits on items of plant and equipment; and
- all plant will be maintained in accordance with manufacturer's recommendations to minimise noise emissions.

Any complaint received will be logged in the site diary and recorded on a complaints form, included at Appendix OT4. The Site Manager will investigate the complaint and will take action to identify the source of the noise and implement remedial measures where appropriate.

4.7 Pests

Due to the biodegradable nature of the waste to be accepted at the site, it is a possibility that pests will pose a risk at the facility.

The waste will be stored in secure, enclosed containers within a weatherproof poly tunnel which should prevent the attraction of pests.

The facility will be inspected by both site management and operatives for infestations of pests, vermin and insects on a routine basis.

In the event that pests are found on site, an investigation will take place as to the cause and remedial actions will take place.

A specialist pest control contractor will be deployed if required.

4.8 Litter and Debris

Due to the nature of the wastes to be accepted on-site, it is not anticipated that litter will pose a significant risk. However, the boundary of the site and its surroundings will be regularly checked and any windblown litter collected and disposed of appropriately.

A housekeeping regime will be implemented on site to ensure the risk of litter on site is minimised, including the provision of bins.

It will be the responsibility of the site staff to constantly monitor the site for any signs of escaping materials either from within the site or from vehicles delivering materials to and from the site.

Inspections will be carried out on a weekly basis and a record maintained within the site diary.

5.0 INFORMATION

All relevant notifications and submissions to NRW regarding the site will be made in writing and will quote the permit reference number and the name of the permit holder.

Records will be maintained for at least six years. However, in the case of off-site environmental effects and matters which affect the condition of land and groundwater the records shall be kept until permit surrender. Duty of Care records will be kept for a minimum of two years.

5.1 Reporting and Notifications

5.1.1 Changes in Technically Competent Persons

NRW will be informed in writing of any changes in the technically competent management of the site and the name of any incoming person, together with evidence that such person has the required technical competence.

5.1.2 Waste Types and Quantities

A summary report of waste quantities accepted and removed from the site for each quarter, will be submitted to NRW within one month of the end of the quarter unless otherwise required by the permit conditions.

5.1.3 Relevant Convictions

NRW will be notified of the following events:

- Tip Top Toilets Limited being convicted of any relevant offence; and
- any appeal against a conviction for a relevant offence and the results of such an appeal.

5.1.4 Notification of Change of Operator's or Holder's Details

NRW will be notified of the following:

- any change in the operator's trading name, registered name or registered office address; and
- any steps taken with a view to the company going into administration, entering into a company voluntary arrangement or being wound up.

5.1.5 Adverse Effects

NRW will be notified without delay following the detection of the following:

- any malfunction, breakdown or failure of equipment or techniques;
- any accident;
- fugitive emissions which have caused, is causing or may cause significant pollution; and
- any significant adverse environmental and health effect.

5.1.6 Record Keeping and Reporting

Records required by the Environmental Permit and under Duty of Care will be kept on site for a minimum of 2 years, and longer if necessary. NRW will be notified of any accident, breakdown or failure which may cause significant environmental effect.

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