



global environmental solutions

Forward Waste Management Limited
East Moors Waste Transfer Facility,
East Moors Road, Cardiff

Bespoke Environmental Permit Application
Operating Techniques
SLR Ref: 407.05789.00001/OT

December 2015



forward

Reducing waste in every way

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REFERENCED DRAWINGS

- Drawing 01 Site Location Plan
- Drawing 02 Site Layout
- Drawing 03 Sources, Pathways and Receptors
- Drawing 04 Cultural and Natural Heritage

1.0 INTRODUCTION

Forward Waste Management Limited has instructed SLR Consulting Limited (SLR) to prepare an application for a bespoke Environmental Permit application for the East Moors Waste Transfer Station located off East Moors Road Cardiff, under the Environmental Permitting (England and Wales) 2010 Regulations and subsequent amendments.

The site location is detailed on Drawing 01. Drawing 02 illustrates the proposed Environmental Permit boundary and floor plan. The site's environmental context is illustrated on Drawings 03 and 04.

It is proposed that a maximum of 10,000 tonnes per annum of hazardous waste consisting of European Waste Catalogue code 11 01 09* Sludges and filter cakes containing dangerous substances will be accepted on site. Wastes will be brought into site, deposited and stored within the designated receiving bay within the purpose built building, bulked up and loaded into larger haulage containers for forward movement to suitably permitted waste facilities. No processing or treatment of any kind is proposed at the site.

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

- Application Forms A, B2, B4, F1 and Supporting Information;
- Non Technical Summary (SLR Ref: 407.05789.00001/NTS dated December 2015); and
- H1 Environmental Risk Assessment (SLR Ref: 407.05789.00001/H1 dated December 2015);

1.1.1 Report Structure

This report describes the operating techniques that will be implemented at the facility to ensure compliance with the conditions of the EP. The report has been drafted to satisfy the requirements of Environmental Agency (EA) Guidance¹ 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 How to comply with your environmental permit. EPR1.00 (V6.0 June 2013)

2.0 MANAGEMENT

2.1 Management System

Forward Waste Management Limited will operate their own environmental management system which will ensure that;

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

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 Natural Resources Wales / Environment Agency Guidance.

2.1.1 Management Structure and Responsibilities

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

Whenever the site is open to receive or dispatch wastes, or will 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 regarding:

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

2.1.2 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 technically competent person(s) who will hold the relevant Certificate of Technical Competence (COTC) under the Waste Management Industry Training and Advisory Board (WAMITAB) scheme.

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.

2.1.3 Site Security

In order to prevent unauthorised access, a number of site security measures will be in place at the site including;

- the doors of the waste reception building will be locked when the facility is closed; and
- access to the site will be monitored at the site entrance.

The building will be regularly inspected; any defects or damage which compromise the integrity of the building 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.

2.1.4 Permit Surrender

To assist in permit surrender, records will be maintained to demonstrate how the land beneath the site has been protected at all times between the date of permit issue and the end of permit operations.

Records to be maintained will include:

- maintenance of impermeable surfacing;
- maintenance of drains and sumps; and
- actions taken to clean up incidents and spillages.

2.1.5 Display of Environmental Permit

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

2.1.6 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.

Records will be made and kept up to date on a daily basis to reflect deliveries and dispatches. All records relating to waste acceptance will be maintained and kept readily available at the site or Forward Waste Management Limited's head office and kept for a minimum of 2 years after the waste has been removed off site.

2.1.7 Reporting Non-Compliance and Taking Corrective Action

Procedures will ensure appropriate corrective action is taken in response to problems identified at the site. The procedure 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).

2.1.8 Auditing and Legal Compliance

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

2.1.9 Monitoring, Measuring and Reviewing Environmental Performance

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

2.1.10 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.

2.1.11 Design and Construction Quality Assurance

All relevant elements of the site (not already constructed) will be designed in accordance with recognised standards, methodologies and practices.

The design process will use a risk-based approach and will be appropriately documented using drawings, specifications and method statements to provide an adequate audit trail.

Construction Quality Assurance (CQA) plans will govern all construction activities necessary in the future. These CQA plans will be prepared by competent and suitably qualified persons.

A competent and suitably qualified person will supervise the construction activities.

2.2 Accident Management Plan

Forward Waste Management Limited recognise 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 regulation and company H&S Policy.

2.2.1 Hazard Identification

The following hazards were identified in the Environmental Risk Assessment that was prepared using the H1 methodology and has been submitted in support of this Environmental Permit application (reference 407.05789.00001/H1, dated December 2015):

- 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 H1 risk assessment.

2.2.2 Unauthorised Waste

Acceptance of unauthorised materials could result in unacceptable wastes being stored and treated at the site. All wastes will be subject to inspection and checking against the declaration on the waste consignment / transfer note. In the event that unauthorised waste is delivered to the site, the waste will be segregated and stored in a designated quarantine/isolation area prior to export from site.

2.2.3 Fire Management Plan

In the event of a fire, the following management and mitigation measures will be implemented at site to minimise the potential impact of fire;

- flammable wastes and incompatible materials will not be accepted at the site;
- the plant inspection schedule will include checks of electrical equipment within the site to ensure that any faults are identified and repaired;
- fire extinguishers will be provided at designated locations;
- smoking will not be permitted in the operational areas of the site;
- working practices will ensure the assessment of fire hazards and training of employees in fire prevention, e.g. the use of fire extinguishers and emergency procedures;
- no wastes will be burned on the site and any fire at the site will be treated as an emergency.
- all waste will be stored within the waste reception building, limiting the discharge of potentially contaminative firewater to the ground. In the event of a fire temporary bunds will be placed at the entrances to the building to prevent the ingress of firewater to the surrounding area; and
- any treated waste stored in skips will be contained with the construction of temporary bunds in the event of a fire;

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

- the Site Manager and Fire Brigade will be notified immediately and Natural Resources Wales as soon as practicable;
- if it is safe do so, a temporary bund (firewater booms) will be constructed to ensure that firewater is kept within the building which benefits from impermeable surfacing, or a designated area which would limit overland flow to prevent the percolation of firewater into the ground (any firewater held within the bund will be tested before removal offsite to a suitably licensed facility once the fire has been extinguished) and to protect local surface water receptors;
- if possible, drains will be blocked with drain mats, to prevent the ingress of the firewater;
- if possible, waste that is unburnt will be dampened down to prevent the fire from spreading further and any contaminated runoff will be withheld within the temporary bunded area;
- the burning area will be isolated and attempts will be made to extinguish the fire utilising the onsite fire extinguishers if safe to do so; and
- the site and buildings will be evacuated.

2.2.4 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 oils, fuels or chemicals 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 the capacity of the tank plus 10%. All filling points, vents and gauges will be located within the bund.
- *Storage vessels:* storage tanks will be constructed to the appropriate British Standard;
- *Inspection:* tanks will be inspected visually on a daily basis by the site staff to ensure the continued integrity of the tanks, and identify the requirement for any remedial action;
- *Spill kits:* materials suitable for absorbing and containing minor spillages will be maintained on site; and
- *Monitoring techniques:* the site staff will undertake daily 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.
- Any dry wastes spilled on site will be collected and transported to the appropriate area of the site.
- 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 or drains. The spillage will be cleared immediately and placed in containers for offsite disposal, and Natural Resources Wales will be informed.

2.2.5 Security and Vandalism

The following security measures in place;

- *Site perimeter:* the site benefits from existing perimeter palisade security measures in place, waste will be stored within the waste reception building which benefits from roller shutter doors that, will be locked every night and when the site is closed.
- *Security gates:* the doors to the building will be locked at all times when the facility is unattended;
- *Inspection:* gates and fencing extending around the perimeter of the site will be inspected regularly by the operations staff to identify deterioration and damage, and the need for any repairs;
- *Maintenance and repair:* fencing and gates will be maintained and repaired to ensure their continued integrity. In the event that damage is sustained 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 and 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 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 gates, breaches of security, investigations and actions taken.

2.2.6 Flooding

There are no surface water features within the site's Environmental Permit boundary.

Mapping provided on the Natural Resources Wales website² shows that the site does not lie within an area at risk of flooding.

² <https://maps.cyfoethnaturiolcymru.gov.uk> accessed October 2015

3.0 OPERATIONS

3.1 Process Description

It is proposed that a maximum of 10,000 tonnes per annum of waste type European Waste Catalogue code 11 01 09* Sludges and filter cakes containing dangerous substances, will be accepted on site. Wastes will be brought into site, deposited and stored within the designated receiving bay within the building, bulked up and loaded into larger haulage containers for forward movement to appropriately permitted facilities. No processing or treatment of any kind is proposed at the site.

The proposed site layout and Environmental Permit boundary are illustrated in Drawing 02.

The waste will arrive on site within sealed 35 yd Roll On Roll Off skip lorries. Vehicles will enter the facility off East Moors Road and report to the site office prior to being directed to the designated waste transfer holding bay within the waste reception building.

An operator will visually inspect the vehicle loads for any contaminants before allowing the vehicle to discharge their load prior to exiting the site.

The waste reception building has roller shutter doors and entry / exit points to minimise the potential for fugitive airborne emissions.

The stored waste will then be bulked up and loaded via telehandler to larger capacity haulage containers for forward movement to suitably permitted waste facilities.

The waste source is from a known single source and is weighed via a board of trade weighbridge on exiting the client premises. However, Forward Waste Management are giving due consideration to and hence may install a weighbridge on site within the environmental permit boundary. The material will be contained within sealed skips and monitored during the tipping off process within the designated area. Bulking up operations will be via a telehandler fitted with a bucket weighing system prior to the removal off site.

3.2 Permitted Activities

The waste management operations to be carried out at the site as specified in Annex I and Annex II of the Waste Framework Directive 2008 are detailed below:

- **D15:** Storage pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where it is produced); and
- **R13:** Storage of waste pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where the waste is produced).

3.2.1 Permitted Types and Quantities of Waste

It is proposed the site will accept 10,000 tonnes per annum of a single hazardous waste type.

- 11 01 09* Sludges and filter cakes containing dangerous substances

3.3 Waste Acceptance

3.3.1 Load Inspection and Waste Control

All vehicles bringing waste to the site will report to the site office where the load will be visually inspected, where possible, in order to confirm its description and composition against the relevant waste consignment note, and any other accompanying documentation. All wastes will undergo a further visual inspection during deposition within the designated area.

Wastes will only be accepted at the site if the description in the accompanying documentation is in accordance with the Environmental Permit and that onsite inspection confirms waste is consistent with the description provided.

Should the waste be found not to conform during the initial visual inspection, then the details will be recorded and the vehicle turned away. Should wastes already be discharged within the stockpile area and deemed not to conform or otherwise not be permitted then the waste will be:

- reloaded on to the delivery vehicle; or
- removed to a designated quarantine area as appropriate.

Records of non compliant waste received at the site will include details on:

- the quantity;
- characteristics;
- origin;
- delivery date and time; and
- the identity of the producer and carrier.

Wastes will not be accepted unless the site is adequately resourced to receive the waste.

A record will be kept in the site diary of all rejected wastes. The waste producer and Natural Resources Wales will be notified of the non conformance.

3.3.2 Means of Measurement

Due to the single source nature of the waste entering the site, the quantity of waste accepted and despatched from the facility will be measured via weighbridge at the point of exit at the waste producer's site. If required, weight will be calculated by recording the volume of waste entering the site and the application of standard Natural Resources Wales conversion factors as appropriate. However, as mentioned earlier Forward Waste Management may install their own weighbridge within the confines of the environmental permit boundary.

All wastes entering the site will be recorded upon arrival and exit. Bulking up operations will be via a telehandler fitted with a bucket weighing system prior to the removal off site.

3.4 Waste Storage

All waste will be stored within the confines of the waste reception building.

3.5 Site Infrastructure and Equipment

3.5.1 Site Identification Board

A site identification board which is easily readable from outside the entrance during hours of daylight will be provided at or near the main site entrance.

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

The board will display the following information:

- Site name and address;
- Permit holder;
- Environmental Permit number (s);
- Emergency contact name and telephone number;
- Natural Resources Wales national telephone numbers; and
- Days and hours site is open to receive waste.

3.5.2 Plant and Equipment

The following items of plant and equipment will be held on site from time to time dependant on the waste stream being stored on site. This is not a fixed list of plant;

- Telehandler with bucket weighing system

Additional plant and equipment including, but not limited to, water bowser, spray equipment and road sweeper will be made available if required.

All items of plant and equipment used on site will be maintained in accordance with manufacturer's recommendations.

4.0 EMISSIONS AND MONITORING

The site will be operated so that there will be no point source emissions to air, surface water, groundwater or land.

4.1 Surface Water and Groundwater

The site will be operated to prevent or minimise fugitive emissions to surface water and groundwater.

4.1.1 Engineered Containment

The site building benefits from an engineered containment system comprising of impermeable concrete surfacing throughout

All waste will be stored on impermeable surfacing within the building.

4.1.2 Containment Bunding

All tanks containing potentially polluting liquids will be bunded. Bunds 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);
- have tanker connection points within the bund; and
- be subject to regular visual inspection.

4.2 Sewer

There will be no discharges to sewer from the waste transfer station operation.

4.3 Odour

No significantly odorous wastes will be accepted at the site. Due to the strict control of the waste that will be accepted at the site, odour is not expected to pose a significant risk.

All waste will be stored within the enclosed building.

Operations at the site will be undertaken in accordance with procedures which will ensure that any problems associated with odours will be identified, and appropriate remedial and corrective action will be implemented as soon as practicable, including the removal of any odorous waste where necessary.

Regular olfactory inspection will be carried out by site staff during the course of their normal working activities.

4.4 Dust

In order to minimise the emissions of dust from the waste facility, the following measures will be implemented:

- all waste handling operations will occur within the waste reception building which has a roller shutter door;
- site access & haul roads and operational areas will be maintained and repaired to minimise emissions of dust due to uneven and poor surfacing;
- all roads and operational areas will be swept where necessary to reduce dust emissions;
- all vehicles delivering waste to the site shall be sheeted / enclosed to minimise emissions of dust;
- dust suppression systems will be implemented at the site if necessary. This will include use of water bowzers, and fixed spray bars on waste processing plant;
- regular visual inspection within the building and perimeter site boundary will be carried out by site personnel;
- in the event that significant visual dust is observed at the site permit boundary action will be taken to suppress the dust;
- a record of the inspection findings & remedial action taken will be made in the site diary; and
- the Site Manager will be responsible for implementing the dust management, monitoring and action plan.

4.5 Noise

No waste treatment operations will occur on site. All equipment will be maintained and operated in accordance with manufacturer's guidance and will be maintained in good working order.

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

- all unloading and loading operations will take place within the building;
- avoidance of dropping materials from height;
- all plant will be switched off when not in use;
- 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, generators and engines;
- 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 to prevent the development of potholes will significantly reduce the noise generated particularly by empty vehicles exiting the site;
- 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. The Site Manager will investigate the complaint and will take action to identify the source of the noise and implement remedial measures where appropriate.

4.6 Pests

Due to the nature of the waste proposed to be accepted at the site, it is not anticipated that pests will pose a risk at the facility.

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

A specialist pest control contractor will be deployed if required.

4.7 Litter

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

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

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

4.8 Mud and Debris

The access road for the facility is accessed via East Moors Road. Within the site the following measures will be taken in order to prevent the deposition or tracking of mud or debris from the site onto public areas or highways:

- the yard area will be maintained free of significant quantities of mud and debris;
- where necessary road cleaning equipment will be deployed; and
- all vehicles leaving operational areas will, before leaving the site be cleaned as necessary and will be checked to ensure that they are clear of loose waste and that any products being exported from the site are secure.

In the event that mud, debris or waste arising from the site is deposited onto public areas outside the site, the following remedial measures will be implemented:

- the affected public areas outside the site will be cleaned;
- and
- provision will be made for road sweepers on the site access roads to stop any mud being carried onto public roads, and if required bowsters will be made available to damp down areas during dry periods to ensure that dust is not a problem.

5.0 INFORMATION

All relevant notifications and submissions to Natural Resources Wales 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 6 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 2 years.

5.1 Reporting and Notifications

5.1.1 *Changes in Technically Competent Persons*

Natural Resources Wales 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 types and quantities accepted and removed from the site for each quarter, will be submitted to Natural Resources Wales within 1 month of the end of the quarter unless otherwise required by the permit conditions.

5.1.3 *Relevant Convictions*

Natural Resources Wales will be notified of the following events:

- Forward Waste Management 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*

Natural Resources Wales 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*

Natural Resources Wales 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 or may cause significant pollution; and
- any significant adverse environmental and health effect.

6.0 CLOSURE

This report has been prepared by SLR Consulting Limited with all reasonable skill, care and diligence, and taking account of the manpower and resources devoted to it by agreement with the client. Information reported herein is based on the interpretation of data collected and has been accepted in good faith as being accurate and valid.

This report is for the exclusive use of Forward Waste Management Limited; no warranties or guarantees are expressed or should be inferred by any third parties. This report may not be relied upon by other parties without written consent from SLR.

SLR disclaims any responsibility to the client and others in respect of any matters outside the agreed scope of the work.