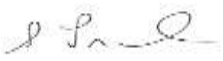
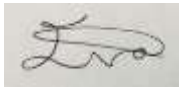
Prepared By:
Steven Tomlinson
Environmental Consultant

Signature 

Date 28th January 2026

Reviewed By:
Eva Mercer
Director

Signature 

Date 28th January 2026

Accepted By:
Douglas Mercer
Managing Director

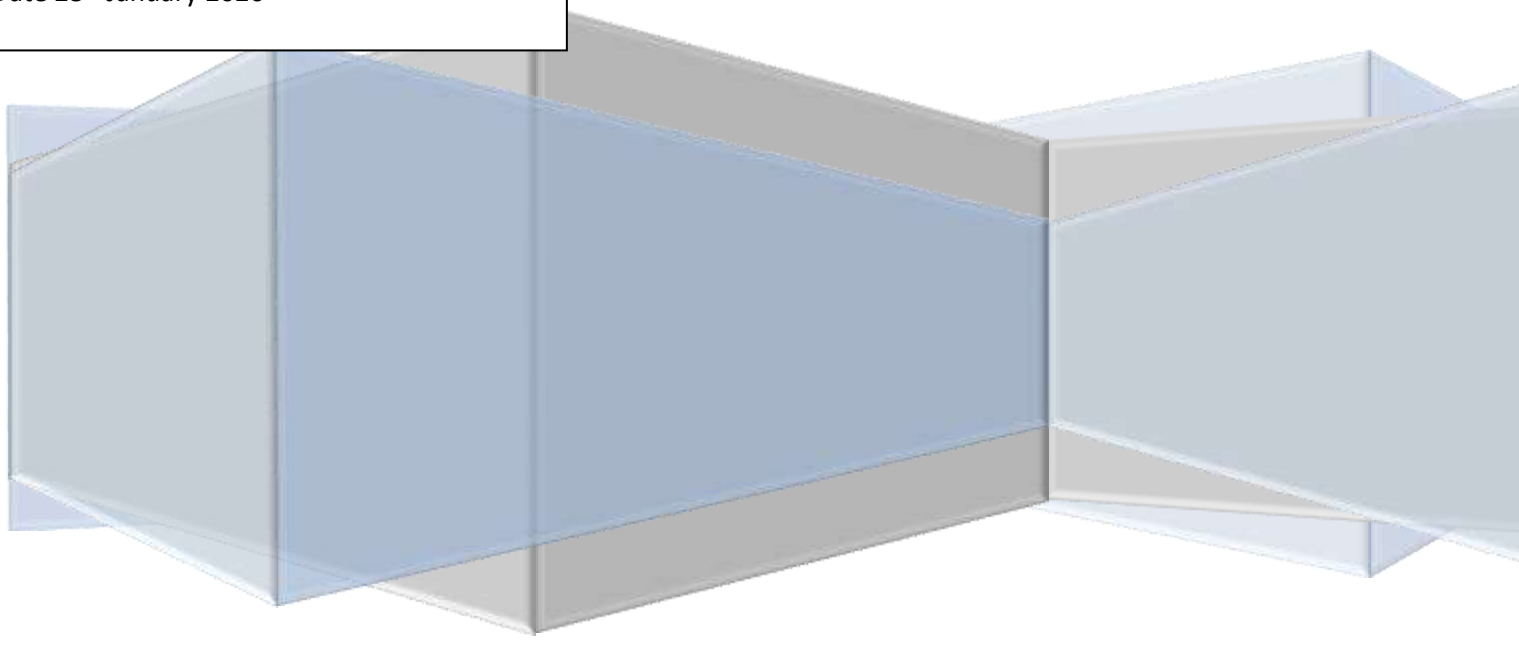
Signature 

Date 28th January 2026

Environmental Management System

Frank Mercer & Sons

Manchester Road
Westhoughton
BL5 3JF



THIS DOCUMENT IS DUE FOR REVIEW IN **January 2028** OR AS A RESULT OF ANY INCIDENTS WHICH MAY LEAD TO THE REQUIREMENT FOR IMMEDIATE REVIEW, WHICHEVER IS THE SOONER

Document History:

Version	Issue date	Author	Checked	Description
1.0	28/01/2026	ST	EM	New Document

CONTENTS

DOCUMENT HISTORY: I
CONTENTS II
LIST OF TABLES IV
LIST OF APPENDICES: V
SITE INFORMATION & KEY CONTACTS LIST VI
1 GENERAL CONSIDERATIONS 1
1.1 SITE OPERATOR/PERMIT INFORMATION 1
1.2 RELEVANT CONTACTS 1
1.3 SITE LOCATION 2
1.4 PERMIT AREA/WASTE MANAGEMENT OPERATIONS 2
1.5 HOURS OF OPERATION 3
1.6 WASTE TYPES AND QUANTITIES 3
1.7 EXEMPT ACTIVITIES 3
1.8 STAFFING AND MANAGEMENT 4
1.9 FIT AND PROPER PERSONS 5
1.10 CONVICTIONS 5
2 SITE ENGINEERING AND INFRASTRUCTURE 6
2.1 SITE DESCRIPTION 6
2.2 ACCESS AND PARKING 6
2.3 SITE OFFICE 6
2.4 WEIGHBRIDGE 6
2.5 NOTICE BOARD AND SIGNS 7
2.6 SITE SECURITY 7
2.7 FUEL STORAGE 8
2.8 REJECTED / QUARANTINED WASTE 8
2.9 DRAINAGE 8
2.10 VEHICLES, PLANT AND EQUIPMENT 9
2.11 MOBILE AND FIXED PLANT MAINTENANCE 9
3 SITE OPERATIONS 11
3.1 PRELIMINARY PROCEDURES 11
3.2 CHECKING IN & INSPECTION OF LOADS 11
3.3 WASTE ACCEPTANCE PROCEDURE 12
3.4 WASTE DEPOSIT & HANDLING 13
3.5 WEIGHING AND CATEGORISING LOADS 13
3.6 WASTE DEPOSIT 13
3.7 WASTE TREATMENT (PLASTIC PROCESSING) 14
3.8 WASTE/PRODUCT REMOVAL AND EXPORT 14
3.9 RECORD KEEPING 15
3.10 MANAGEMENT TECHNIQUES 17
3.11 SITE CLOSURE PLAN 17
4 ENVIRONMENTAL CONTROL, MONITORING AND REPORTING 19
4.1 BREAKDOWNS AND SPILLAGES 19
4.2 SITE INSPECTIONS AND MAINTENANCE 19
4.3 CONTROL OF MUD AND DEBRIS 20

4.4 CONTROL OF DUST 20
4.5 ODOUR CONTROL 21
4.6 LITTER CONTROL 21
4.7 CONTROL OF PESTS, BIRDS AND OTHER SCAVENGERS 22
4.8 CONTROL AND MONITORING OF NOISE & VIBRATION 22
4.9 COMPLAINTS PROCEDURE 23
5 EMERGENCY PROCEDURES AND CONTINGENCIES 24
5.1 GENERAL 24
5.2 FIRE 24
5.3 BREAKDOWNS 26
5.4 SPILLAGES 26
5.5 DRUMS 27
5.6 ADVERSE REACTIONS 27
5.7 STAFF SHORTAGES 27
5.8 ADVERSE WEATHER CONDITIONS 28
5.9 CLOSURE OF DESTINATION SITES 28
5.10 OPERATIONAL FAILURE 29
5.11 BOMB SCARE 29
6 ADAPTING TO CLIMATE CHANGE & WEATHER CONDITIONS 30
6.1 CLIMATE CHANGE 30
6.2 FLOOD RISK / INCREASED RAINFALL 30
6.3 HIGH TEMPERATURES AND HEATWAVES 31
6.4 AVAILABILITY OF WATER 31
6.5 WEATHER CONDITIONS 31
6.6 CONCLUSION 33
7 TRAINING FOR SITE STAFF 34
7.1 TRAINING NEEDS ASSESSMENT 34
7.2 SITE RULES AND INFRASTRUCTURE TRAINING 34
7.3 EMERGENCY PROCEDURES TRAINING 34
7.4 FIRE SAFETY / FIREFIGHTING TRAINING 35
7.5 RECOGNITION OF WASTE TYPES TRAINING 35
7.6 STORAGE AREAS / LIMITS TRAINING 36
7.7 VEHICLE / PLANT PREVENTATIVE MAINTENANCE TRAINING 36
7.8 DUTY OF CARE TRAINING 36
7.9 PLANT OPERATION TRAINING 37
7.10 PERMIT / MANAGEMENT SYSTEM 37
7.11 TRAINING FOR CONTRACTORS 37

List of Tables

Table 1.1 - Staffing numbers and responsibilities 4

Table 4.1 - Noise Management Table 22

List of Appendices:

Appendix I - Drawings

Permit Boundary Plan Drawing

Site Layout & fire Plan

Appendix II - Record Keeping Forms

Rejected Waste

Site Diary/Inspection Form

Visitors Log

Employee Training Record

Complaints Form

Appendix III - Plant and Machinery List

Appendix IV - Health and Safety – Conditions of site use for staff and visitors

Site Information & Key Contacts List

Site Address:	Manchester Road, Westhoughton, BL5 3JF		
Site Operator:	Frank Mercer & Sons Ltd	**National Grid Ref:**	SD 67324 06243

CONTACT	DESCRIPTION	OFFICE HOURS	OUT OF HOURS
Eva Mercer **Ryan Mather**	Directors / Out-of-hours / on call contacts	01942 841111	07496 824682 07436 145648
Eva Mercer **Ryan Mather**	Technically Competent Manager / Out-of-hours / on call contact	01942 841111	07496 824682 07436 145648
Royal Bolton Hospital Minerva Road Farnworth BL4 0JR	Local NHS Hospital (Main)	111 or 01204 390390	999
	Emergency	999	999
Deane Clinic One Stop Health Centre Deane Clinic, One Stop Health Centre, Horsfield Street, Bolton, Lancashire, BL3 4LU	Local Doctor Surgery (GP)	01204 661600	999 or 112
Westhoughton Police Station 6 Pavilion Gardens, Westhoughton, Bolton BL5 3AJ	Local Police Non-Emergency	0161 856 7971	999 or 112
	Police Emergency	999 or 112	999 or 112
Farnworth Fire Station Albert Rd, Farnworth, Bolton BL4 9HF	Fire and Rescue Service (in Emergency Dial 999)	01204 909503	999 or 112
Environment Agency Richard Fairclough House, Knutsford Rd, Latchford, Warrington WA4 1HT	Environmental Regulator	03708 506506	0800 80 70 60
Bolton Metropolitan Borough Council Bolton Council Town Hall Victoria Square Bolton BL1 1RU	Local Council General Enquiries	01204 333333	999
United Utilities	Mains Water Supplier	0345 672 3723	0345 672 3723
Time to Train Consultancy 20 Church Street Colne BB8 0LG	Specialist Advisor (Waste and Planning Issues)	0800 488 0518	07813841067

1 General considerations

1.1 Site operator/permit information

1.1.1 Frank Mercer & Sons are the operator of the proposed site. The site will be operated predominantly as a manufacturing process involving the receipt and use of raw materials for the production of building products. All activities are carried out within the site boundary on established industrial premises.

1.1.2 Materials are received, stored, processed, and incorporated into finished products in accordance with documented procedures. No waste recovery or disposal activities are carried out beyond those directly associated with the manufacturing process.

1.1.3 This Environmental Management System (EMS) represents the site operations and will be subject to a detailed annual review from the date of issue and every year thereafter. This review does not preclude periodic updates that may arise from experience of operating the site as it is a living document and may be updated at any time.

1.1.4 Developments in legislation and the regular increases in the Landfill Tax have increased the need for effectiveness and scope of operations at waste transfer and recycling centres, leading to greater recovery rates for recyclable waste.

1.2 Relevant contacts

1.2.1 Registered office details for the operator are as follows:

Frank Mercer & Sons
Chequerbent Works, Manchester Road
Westhoughton, Bolton BL5 3JF

Contact: Eva Mercer
Position: Director
E-mail: eva@toughsheet.co.uk

1.2.2 Time to Train Training & Consultancy Ltd has been engaged to act as consultants for Frank Mercer & Sons to assist in the preparation of this Environmental Management System (EMS). This EMS has been prepared to meet the requirements of The Environmental Permitting (England and Wales) Regulations 2016 and the EA's Guidance: "*how to comply with your environmental permit*".

1.2.3 Contact details for Time to Train Training & Consultancy Ltd are as follows:

Steven Tomlinson - Director
20 Church Street Colne BB8 0LG
steven@timetotrain.co.uk

1.3 Site location

1.3.1 The site is located at Chequerbent Works, Manchester Road , Westhoughton, Bolton BL5 3JF as shown on Drawing One

1.3.2 The site is predominantly located in an industrial area with commercial/industrial land uses surrounding the site from three sides and residential properties from one side.

1.4 Permit area/waste management operations

1.4.1 The permit boundary is outlined in red on Drawing One. All references to 'the site' in this EMS shall mean this area and the associated infrastructure, plant and equipment. This EMS should be read in conjunction with the site's Fire Prevention Plan (FPP).

1.4.2 The recycling site allows for the reception, storage and handling of non-hazardous wastes to permit recycling and recovery.

- Manual & Mechanical sorting/separation etc… by using appropriate mechanical plant and equipment
- Shredding by mechanical plant and equipment
- Heated granulation by mechanical plant and equipment
- Bagging by hand and equipment
- Wrapping by mechanical plant and equipment
- Loading/Unloading of waste/material

1.5 Hours of operation

1.5.1 The site operates 24/7 but will only be open between 8am and 5pm Monday to Friday for the delivery and receipt of waste on site. It is therefore anticipated that there will always be a member of staff on site during operational hours.

1.5.2 In the event that the site is closed or not in operation for any reason, the gates will be locked and secured to prevent unauthorised vehicular and/or pedestrian access and a 24-hour security presence will be maintained to monitor waste and product stocks.

1.6 Waste types and quantities

1.6.1 The locations of the operational and storage areas are shown on Drawing Three.

1.6.2 The waste types handled on site will consist of HDPE, LDPE film, PE scrap, baled film, bagging waste, trims and offcuts, purge including regrind, 15.01.02, 20.01.39, 19.12.04, 07.02.13 as defined in the Controlled Waste (England and Wales) Regulations 2012 and Section 75 of the Environmental Protection Act 1990. A detailed breakdown of the waste types allowed for acceptance at the site will be shown in the environmental permit. No hazardous, clinical or liquid wastes will be accepted at the site.

1.6.3 The storage area equates to 275 tonnes on site when at full capacity. The average output is 28 tonnes per shift x 2 shifts x 7 days = 392 tonnes per week.

The maximum storage limit of 275 tonnes has been derived from the total available storage volume of 507m³ across the designated bays at a maximum pile height of 2 metres. Material-specific bulk density assumptions have been applied (0.35–0.70 t/m³ depending on material type), resulting in a calculated physical capacity of approximately 270–275 tonnes. The 275-tonne limit therefore reflects the upper bound of the physically achievable storage volume while remaining proportionate to site footprint and fire load distribution. Storage is segregated across 12 individual bays, preventing excessive accumulation in any single fire cell and ensuring material turnover remains aligned with the maximum throughput of 56 tonnes per day.

1.6.4 The factory undergoes six weeks of shut down for the maintenance of machinery and clean up. Therefore, the total output of manufactured material equates to 18,032 tonnes per annum.

1.6.5 In the event piles have reached the limits following routine inspections, the site will divert material to an alternative site until volumes/tonnages have been reduced to suitable level.

1.7 Exempt activities

1.7.1 Activities which are outside the scope of the EP for the site (listed in Schedule 3 of The Environmental Permitting (England and Wales) Regulations 2016) may be carried out at the recycling site and the relevant details would be registered with the EA prior to commencement.

1.7.2 Current and future exemption notifications and register entries are held in the site office. Registered exemptions are valid for a period of 3 years. If the activity is to be carried on after 3 years, a renewal will be submitted to the EA.

1.7.3 Wastes brought onto site as part of any exempt waste activities will be kept clearly segregated and identified from those wastes imported for the specified waste management operations.

1.8 Staffing and management

1.8.1 The table below details the staff structure of the site when operating at full capacity. Positions in bold italic print below are the minimum staff requirements when the site is open for the reception of waste.

Table 1.1 - Staffing numbers and responsibilities

Position	Employees	Responsibilities
Site managers	4	Ensuring that the site is being operated in accordance with the Environmental Permit and in-line with attendant regulations
Administrative staff	5	Office/administrative duties
Yard operatives	5	Waste handling/processing, reception and plant operation
Production operatives	65	Waste handling/processing, reception and plant operation
Maintenance staff	4	Maintenance of plant and equipment
Drivers	5	Transporting or material

1.8.2 All operations on site will be carried out in accordance with the relevant requirements of the Health and Safety at Work Act 1974. Conditions of site use for employees, visitors and contractors are shown in Appendix IV. These conditions will be shown to all site users and must be signed prior to using the site. Anyone refusing to comply with the conditions of use will be asked to leave the site.

1.9 Fit and proper persons

1.9.1 The site will assign a Technically Competent Manager (TCM) who provide the required attendance time at the facility as required by guidance periodically issued by the EA. A copy of the appointed TCM's Certificate of Technical Competence (COTC) will always be made available in the site office.

1.9.2 The company, through the TCM, will ensure that a nominated deputy is sufficiently trained and familiar with the EP and this EMS document in addition to all relevant company procedures who, in the absence of the TCM, will act the competent person. If either the TCM or deputy is changed, the EA will be informed of the change and the relevant details of the replacement as soon as possible.

1.10 Convictions

1.10.1 At the time of application, neither Frank Mercer & Sons nor any of the relevant people within the company had been convicted of a relevant offence.

2 Site engineering and infrastructure

2.1 Site description

2.1.1 The site is located as shown on Drawing One. The site benefits from a number of parking spaces for staff, visitors, HGV's and trailers.

2.2 Access and parking

2.2.1 The site is accessed off Manchester Road. The site will have a dedicated staff and visitor car parking area.

2.3 Site office

2.3.1 The site office is shown on Drawing Three and the list below details the relevant site documentation which will be kept in the site office.

Documents to be retained in site office
The Environmental Permit (original & any subsequent variations)
This Environmental Management System (EA agreed document)
Current site diary (to record all inspections/visitors to the site)
Environment Agency Inspection (CAR) forms
In-house inspection sheets/recording forms
Duty of care transfer notes (these are now kept on our new waste logics software which is cloud based)
Hazardous waste consignment notes (kept for 5 years)
Waste delivery tickets (these are now kept on our new waste logics software which is cloud based)
Accident book (& First aid kit)

2.4 Weighbridge

2.4.1 There will be a weighbridge on site for accurately weighing all incoming/outgoing loads of waste; however, the weight of each load into and out of the site can also be estimated using the standard EA/WRAP agreed volume-to-weight conversion factors.

2.5 Notice board and signs

2.5.1 A notice board is erected at the site entrance displays the following information:

- The site name and address.
- The name of the permit holder and operator.
- Environment Agency contact details, Emergency No. 0800 80 70 60 and General Enquires No. 03708 506 506.
- Operator's "out of hours" emergency contact details.
- Operating hours.

2.5.2 Additional signs are displayed around the site for operational / health & safety purposes. All staff and visitors will be required to comply with the requirements of all signs whilst on site.

2.6 Site security

2.6.1 The site has suitable perimeter security i.e. fencing, buildings and access gates. The perimeter is considered suitable in preventing unauthorised access to the site. Details of the perimeter is shown on Drawing One.

2.6.2 The site security measures will be inspected on a daily basis and any defects which impair the effectiveness of the security will be repaired by the end of the working day. If this is not possible, temporary measures will be put in place to ensure no unauthorised access to the site can be gained until the proper repairs can be carried out as soon as practicably possible.

2.6.3 The site benefits from 24hr security and has remotely accessible CCTV fitted with full site coverage and off-site supervision.

2.6.4 If unauthorised access becomes apparent as a problem at the site the security measures will be reviewed and improvements implemented.

2.7 Fuel storage

2.7.1 The location of fuel storage (if applicable) will be shown on Drawing Three and procedures for fuel storage on site are as follows:

- Tanks are surrounded by a bund capable of containing a minimum of 110% of the volume of fuel stored in the tank.
- All pipework and associated infrastructure will be enclosed within the bund.
- A lock will be fitted to the tank valve to prevent unauthorised operation.
- All valves and gauges on the bund will be constructed to prevent damage caused by frost.
- The tank is stored 6m away from any waste processing equipment.

2.7.2 The tanks will be clearly marked showing the product within and also its capacity.

2.8 Rejected / quarantined waste

2.8.1 Any waste which is rejected will be stored in a quarantine area. The location of this area is included on Drawing Three

2.9 Drainage

2.9.1 The drainage for the site is clearly shown on Drawing Three and if there is any deviation from the current drainage arrangement, an amended EMS will be submitted for approval by the EA.

2.10 Vehicles, plant and equipment

2.10.1 Waste will be handled using the plant listed in Appendix III. Only trained operators will be permitted to drive/operate the plant listed below. Any changes to the list will be notified to the EA prior to implementation.

2.11 Mobile and fixed plant maintenance

2.11.1 All mobile and fixed plant on site including vehicles in the fleet are subject to annual manufacturer maintenance to ensure proper working order in the form of service contracts.

2.11.2 Site management will undertake or delegate additional preventative maintenance checks on a more frequent basis i.e. daily, before, during and 1 hour at the end of each working day using a checklist similar to that in Appendix II to ensure the following:

- Machinery is mechanically sound for use and no presence of black fumes or trailing liquids visible prior to use or following shutoff of plant/equipment.
- All plant will be powered-down and completely shut off prior to cessation of operations on any given day.
- Plant which is not in use for any extended period is stored at least 6 metres from combustible waste.
- All plant and equipment vehicles are fitted with fire extinguishers in the cab. Rubber strips are not considered appropriate as they are usually removed via uneven and bumpy ground.
- Dust from processing/treatment operations on site can settle throughout the working day onto processing plant, plant exhausts and engine parts so a fire-watch will be implemented after cessation of works and equipment powered down for 1 hour each day to remove any dust/fluff using brushes, hoses etc... Any build of dust/fluff will be removed from the equipment and deposited into a container to await removal from site and site management informed.

3 Site operations

3.1 Preliminary procedures

3.1.1 Guidance will be given by the site management to all employees, sub-contractors, other waste carriers and customers regarding the waste types and operations which are acceptable at the site.. The site will be used for the acceptance, temporary storage and processing of waste using Frank Mercer & Sons's own vehicles/contracts and also for third-party users/hauliers whose details would be checked prior to the delivery/collection of waste.

3.1.2 The procedures below would be followed prior to the receipt of waste on site.

3.1.3 When a driver employed by the permit holder arrives at the waste producers premises, he/she will inspect the load for conformity with relevant regulations and safety procedures.

a) If the load is satisfactory the driver will sign the relevant paperwork (Duty of Care transfer note/delivery ticket) and remove the load from the premises.
b) If the waste does not meet the description stated on the controlled waste transfer note the customer is advised to check the note and give a more detailed description of the waste.
c) If the more detailed description of the waste reveals that the waste is not/permitted at the recycling site, then the customer is advised that the waste must be taken to another site which is appropriately permitted to accept the waste(s).

3.1.4 If further instructions are needed the driver may also report back to the site manager.

3.2 Checking in & inspection of loads

3.2.1 All incoming vehicles are required to report to the site office. The details of the load will be recorded, and the transfer note and company documentation will be further checked by the operator to ensure that the load is acceptable at the site. The weight of all loads will be recorded on a weighbridge or agreed WRAP conversion weights for loads where the weight is not known upon receipt at the site. Any deviation from these procedures or problems with any loads will be reported to the site manager.

3.2.2 All vehicle drivers must report to the site/weighbridge office upon arrival at the site. Each load will be weighed, recorded and its contents inspected. All waste accepted on site will be directed to the appropriate reception area.

3.2.3 Once a load has been accepted the driver will be asked to unsheet the vehicle (if it is sheeted) and a visual inspection of the contents will be carried out to ensure that the material complies with the EP. If non-compliant waste is discovered before deposit, the load will not be accepted and disposed of at an approved facility. In cases where the presence of unauthorised waste is likely to lead to a breach of permit conditions, the EA will be contacted immediately to agree a course of action.

3.2.4 Each load is assessed for visual signs of contamination within the material. If a load is deemed unacceptable it will either be returned to its source or placed into the quarantine skip pending removal off site to a suitable permitted facility.

3.2.5 Loads are also examined at the point of unloading. If they are found to be unacceptable at this point the load will be reloaded and returned to source. If small levels of contamination are noted, they are handpicked and reject material placed in the quarantine skip for safe disposal.

3.2.6 If hazardous waste or suspected hazardous waste is deposited on the site, the material will be left alone with precautions taken to absorb any spillages and the area cordoned off. The EA will be contacted as a matter of urgency and the material left in situ until removed under the EA's instruction.

3.3 Waste acceptance procedure

3.3.1 All incoming vehicles upon arrival are required to report to the person in charge of waste acceptance at the site. The details of the load will be recorded, and the duty of care note/company documentation will be further checked by the operator to ensure that the load is acceptable at the site, including a visual check prior to the vehicle proceeding to the tipping area. Any deviation from the procedures or problems with any loads will result in tipping facilities being suspended for the offending company. Loads which are not acceptable within the above terms will be rejected as per the previous sections.

3.4 Waste deposit & handling

3.4.1 Once a load has been accepted by the operator, the contents will be discharged into the appropriate reception, storage and treatment area as shown on Drawing Three.

3.5 Weighing and categorising loads

3.5.1 The weight of each load into and out of the site will be weighed using the site's weighbridge to obtain accurate data for the purposes of providing waste returns and tracking the annual throughput of waste.

3.5.2 Should the weighbridge be off-line for any reason (fault/maintenance/failure/etc.), the weights of loads will be estimated using the standard EA and WRAP agreed volume-to-weight conversion factors.

3.6 Waste deposit

3.6.1 The majority of loads are delivered in curtain sided vehicles, containers or HGV's and once the vehicle curtains have been opened, yard staff assess the material. If there is a problem with the material a supervisor or manager in charge will be called immediately and unloading will cease until further instructions are received.

3.6.2 Once a load has been deposited in the waste reception bay/area, it will be subject to the processing procedures in this EMS.

3.6.3 Non-conforming wastes rejected at any stage in the process will be deposited in the area provided for non-conforming wastes. Where necessary, particularly where the rejected waste discovered would be classed as a difficult, hazardous or clinical waste, the EA will then be contacted to agree a course of action. The contents of the rejected waste skips/containers will be recorded in the site diary.

3.7 Waste treatment

3.7.1 A summary of the process is presented below:

3.7.2 **Waste Reception**

Waste material received from external sources which are unloaded and placed into their respective bays for sorting.

3.7.3 **External Shredder**

Once the collected materials are sorted into their relevant bays, they are sent to the shredder. The operational process of this machine involves grinding waste plastics through a static blade where it is then transported through a conveyor belt and shredded further through a size reduction machine to produce a plastic flake, before entering the reclaim lines. On occasion and as per the 'reclaim line' this process can produce a waste by-product. However, and as per the reclaim line, any waste by product can be transported back through the shredder which allows the process to completely eliminate any waste making for an optimal sustainable process.

3.7.4 **Reclaim Lines**

The reclaim lines involves taking the shredded waste and manufacturing it into damp proof membranes, damp proof courses, radon gas barriers and rubble sacks. The first stage of these lines involves the transferring of used plastics onto a conveyer belt where it is deposited into a finer grain plastic shredder (Linder Micromat 2000). Once the materials have been shredded, they will be transported into a second shredder containing more

blades to ensure a finer material has been established. The finer product then enters into a heater band (Erema) which under pressure melts the material forming small polyethylene pellets.

The pellets are then dried and blown into silos via feeding pipes under pressurized air. Following this, the product enters an extruder and dye head where it is then blown into a film bubble. The film is guided through numerous rollers and then pulled through a 'roll-o-matic' machine to establish a finer end product. The film is wound and cut to the required length of material required by the customer. The rolls are then inspected for defects that could jeopardise the final product and weighed to ensure it meets BBA standards. Any by-product or defective product can be transported back through the reclaim line for a second cycle, or alternatively it can be fed into the plastic lumber extrusion line to produce an alternative product, which allows the process to completely eliminate waste making for a 100% sustainable process. Once approved the final product is then packaged using a film wrap which is manufactured in house from 100% recycled materials

3.8 Waste/product removal and export

3.8.1 When a collection vehicle arrives at the site the driver will be instructed to report to the site office on arrival. All relevant documentation will be completed, and the vehicle will be passed to pick up the load and take it to the designated recycler/disposal site. The product or waste material will be loaded using the loading shovel or excavator and then weighed on the weighbridge prior to egress from the site.

3.9 Record keeping

3.9.1 Frank Mercer & Sons use detailed waste transfer and product notes in paper and electronic form to ensure compliance with the Waste Duty of Care Code of Practice - March 2016 (Section 34(9) of the Environmental Protection Act 1990). The following points detail the correct information required in order to comply with the Waste Duty of Care Code of Practice which the operator will provide on all documentation:

- a written description of the waste which has been agreed and signed by the operator and the next holder. The description is part of the waste information the operator will provide.
- a statement confirming that the operator has fulfilled the duty to apply the waste hierarchy as required by regulation 12 of the Waste (England and Wales) Regulations 2011 (see Waste Hierarchy Guidance for England and Wales)
- the description of the waste is accurate and contains all the information required to ensure the lawful and safe handling, transport, treatment, recovery or disposal by subsequent holders, including classification of the waste by using the appropriate codes (referred to as the List of Wastes (LoW) or European Waste Catalogue (EWC)) - Appendix A of the Waste Classification Technical Guidance provides a list of the codes as well as advice on how to assess and classify waste.
- the quantity and nature and whether it is loose or in a container, if in a container, the type of container
- the time and place of transfer
- the SIC code of the transferor (current holder of the waste)
- the name and address of the transferor and transferee (person receiving the waste) and their signatures (the signature can be electronic as long as an enforcement officer can view it)
- the capacity in which the transferor and transferee are acting (e.g. as a producer, importer or registered waste carrier, broker or dealer) and their relevant authorisation to act in that capacity (e.g. their permit number or registration number)

3.9.2 For non-hazardous waste this will be done by using:

- a paper WTN and form to fill in or alternative documentation e.g. an invoice, as long as it contains all the required information.
- a season ticket which is a single waste transfer note that covers a series of non-hazardous waste transfers. The season ticket will last up to one year and be used for regular transfers of the same type of non-hazardous waste with the same carrier. If the operator has several sites serviced by the same carrier with the same types of waste collected, these can be listed in a schedule to the season ticket. The operator will keep a record of the collection times and the quantity of waste.

3.9.3 A waste information note will not be required for non-hazardous waste if the waste holder does not change on the transfer of waste e.g. the waste is moved to other premises belonging to the same business. However, it is best practice that the business understands who has responsibility for that waste and a record is kept of internal transfers for audit purposes.

3.9.4 **Hazardous waste:** The site will not be accepting any hazardous waste into the site and if any hazardous waste or non-conforming waste is to be removed, it will be done so using a fully completed hazardous waste consignment note and sent to a suitably permitted site. The records of which will be kept for 5 years.

3.9.5 A summary of waste types and quantities deposited at and removed from the site and origin and destination details are then forwarded to the EA using the standard Generic Operator Returns electronic spreadsheet(s), with submission due within one month of the end of each quarter as below:

a) Quarter 1: January to March (due on or before 30th April)
b) Quarter 2: April to June (due on or before 31st July)
c) Quarter 3: July - September (due on or before 31st October)
d) Quarter 4: October - December (due on or before 31st January of the following year)

3.9.6 Outcomes of inspections of waste types, hardstanding areas, transfer/treatment areas, storage areas, drainage channels, etc. are recorded using the site inspection form

FM/RF/4 or similar document and detailed comments are entered into the site's diary (including action taken or proposed).

3.9.7 Visitors to the site are made to sign the visitor's book upon arrival and exit stating the purpose of their visit and whom they represent.

3.10 Management techniques

3.10.1 All measures necessary to achieve a high level of protection of the environment and to ensure that the site is operated in accordance with the various management systems and permit conditions will be strictly adhered to.

3.10.2 The manner in which the facility is managed is a critical element in ensuring emissions from the site operations are minimised. Therefore, management of this facility ensures:

a) Staff are competent to manage and operate the facility i.e. fit and proper persons;
b) Waste acceptance procedures are in place;
c) Appropriate storage and handling procedures are in place;
d) Waste/product dispatch procedures are in place;
e) Procedures and control techniques in place to minimise potential emissions to air, land and water;
f) There is an EMS, i.e. this document, in place to ensure standards are maintained, including incidents and complaints management procedures;
g) A communication programme is in place; and,
h) A health and safety programme is in place and is coherently conveyed to all staff and rigorously enforced throughout the whole of the organisation.

3.11 Site closure plan

3.11.1 In the event that the site ceases to operate as a waste transfer/treatment facility as set out in the site's EP, the following steps will be followed to achieve site closure:

a) Contact the EA to advise the Environment Officer(s) that the site is planned to cease / has ceased the acceptance of wastes under the permit.

b) The amount of residual processed & unprocessed waste on site will be assessed by the TCM to set a timetable for the final processing and timely removal of waste from site.

c) Following removal of all waste, plant and machinery from site a Site Investigation will be undertaken to ascertain the ground conditions of the land to which the site relates.

d) A surrender application will then be submitted to the EA for determination.

4 Environmental control, monitoring and reporting

4.1 Breakdowns and spillages

4.1.1 In the event of breakdown of the loading plant, an alternative machine will be brought on site until it is repaired. If an alternative machine cannot be used, then waste will be stored securely until the plant is repaired. The repair will be carried out at the most convenient location with absorbents used to clear oil or fuel spillages.

4.1.2 All site surfaces will be inspected daily when the site is in operation. Debris will be swept as required and placed in a skip for disposal to a suitably permitted site.

4.1.3 Any spillages of fuel/oil will be cleared immediately by depositing sand or absorbents on the affected area. The sand or absorbents will be placed in a skip to be taken to a suitably permitted site for disposal. All spillages of waste and windblown litter will be cleared by the end of the working day in which they occur. Spillage clearance procedures are detailed in Section 5.4.

4.1.4 All wastes liable to give rise to contamination will be removed from the site if the site is not secure or if operations cease or are temporarily suspended.

4.2 Site inspections and maintenance

4.2.1 The type and inspection frequencies for maintenance/housekeeping are listed on record form FM/RF/4 as an advisory. The inspection form will be completed by a person who is familiar with the requirements of the EMS and EP for the site. All details of defects, problems and repairs carried out will be recorded on the form on the day that each event occurs. Detailed comments may also be recorded in a site diary. All repairs will be carried out as soon as practically possible.

4.2.2 All repairs to site security will take place as soon as practically possible and the site will be made secure until the repair has been carried out. Any major defects found during the daily site inspection will be repaired as soon as practically possible.

4.3 Control of mud and debris

4.3.1 Vehicles will be visually inspected before exit to check that loads are safe and that no mud is carried out onto the site's access road or onto surrounding highways on the wheels or bodies of HGVs. Visual inspections of the vehicle running surfaces at the site will be carried out daily (see FM/RF/4), however, staff will report any problems with mud or debris on the site roads immediately to the site manager.

4.3.2 The deposit of material on the access road or public highway will be treated as an emergency and will be cleared immediately by the operator using either a brush and shovel or vacuum tanker/road sweeper if necessary. Silt will not be washed into roadside drains or gullies.

4.4 Control of dust

4.4.1 The operator is aware that the containment of dust on site and the prevention of its escape is paramount to operational compatibility with local businesses and residents.

4.4.2 A series of dust mitigation measures are implemented on site and when site conditions dictate to ensure dust emissions are controlled as far as is practically possible. The measures include:

- sheeting of vehicles delivering waste to the site (if necessary);
- sheeting of vehicles transporting potentially dusty loads off site;
- cleaning of any spillages using wet cleaning methods;
- use of crusting agents on stockpiles of finer materials, if required;
- stockpiles will be kept to a minimum as operating conditions allow;
- drop heights **ALWAYS** minimised to prevent dust emissions.
- A constant water supply will be available on site for dust suppression in all dry, hot weather conditions.

4.4.3 Site operatives will continuously monitor dust emissions whilst the site is in operation and will report back to the site supervisor for advice if required. The site supervisor will make a formal visual inspection of dust emissions at least three times per day. Results of monitoring will be entered into the site diary/record forms.

4.4.4 The deposit of material on the access road or public highway will be treated as an emergency and will be cleaned immediately using a brush and shovel or a road sweeper/vacuum tanker (hired-in) if necessary.

4.5 Odour control

4.5.1 Strict turnaround times for any wastes which could give rise to odours will mean that the site will present a low risk of odour nuisance. If malodorous waste is deposited on site, it will be consigned to the skip for rejected waste or removed from the site immediately.

4.5.2 The complaints procedure in record form FM/RF/6 will be rigorously enforced should a third-party complaint be received from a public or private source.

4.6 Litter control

4.6.1 Given the nature of wastes accepted at the site, there is a risk of litter escaping the site boundary and therefore careful management is required to reduce the risk to low/negligible.

4.6.2 Daily inspections for litter will be carried out for the presence of windblown litter and operatives will be instructed to collect the litter and place it in a skip for disposal/recovery before the end of the working day. In any event, all light waste will be placed in skips before the end of the working day. Regular checks of the areas immediately beyond the site boundary will be carried out by site operatives.

4.6.3 In the event of high winds, the light waste will be transferred to a sealed skip to prevent it being blown off site.

4.7 Control of pests, birds and other scavengers

4.7.1 The site will be inspected daily for the presence of vermin and the results of the inspection noted in the site diary or site inspection form. If any occurrences are noted, a pest controller will be called to site to eradicate the problem.

4.8 Control and monitoring of noise & vibration

4.8.1 The location and surrounding land uses means noise associated with the operations will not greatly increase the existing noise level in the surrounding area. The waste operations will be carried out using the best practicable means at all times.

4.8.2 The likely sources of noise arising from the development; and, the actions to be taken / procedures to be followed or planned in order to prevent or minimise levels are shown on the table overleaf.

Table 4.1 - Noise Management Table

Potential Noise Source	***Action to be taken to prevent or minimise noise***
HGVs travelling to and from the site for delivery/collection of wastes/products.	• All vehicles are required to be driven onto and off site with due consideration for neighbouring premises. • HGV movements will be spread out evenly throughout the day.
Loading/unloading of waste delivery vehicles	• Vehicles must be well maintained and operated with silencers. Moving parts to be regularly lubricated. • All vehicles must be driven slowly around the site (5mph site speed limit). • Engines to be switched off when not in use. • Reversing alarms to be preferentially fitted with white noise alarms to minimise impacts on neighbouring sites. • No shaking of vehicle bodies whilst raised.
Operation of loading plant	• Drop heights to be kept to a minimum, particularly when loading empty tipper wagon/skip/container to minimise noise/vibration. • Engines to be switched off when not in use. • Plant to be well maintained and operated with silencers. Moving parts to be regularly lubricated. All vehicles must be driven slowly around site. • Loading plant/machinery will only be operated at ground level, i.e. never on stockpiles.

Operation of treatment plant	• Drop heights to be kept to a minimum, particularly when loading empty tipper wagon/skip/container to minimise noise/vibration. • Plant and engines to be switched off when not in use. • Plant to be well maintained and operated with silencers. Moving parts to be regularly lubricated. All vehicles must be driven slowly around site.
Small vehicles travelling to and from the site (e.g. staff and visitor's cars, courier van deliveries etc.)	• All those working on and visiting the site to be made aware of need for considerate driving and keeping vehicles well maintained. • Small vehicles will arrive marginally earlier than the main site operating hours.

4.9 Complaints procedure

4.9.1 Any third party complaints received will be recorded on form FM/RF/6 and will include a record of the complaint, particulars of the complainant and details of any action taken to alleviate the problem to ensure the likelihood of a future third party complaint is minimised.

5 Emergency procedures and contingencies

5.1 General

5.1.1 In addition to obligations imposed by RIDDOR '13 (Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013) the permit holder will notify the EA of any serious injuries to employees of Frank Mercer & Sons, other site users or members of the public arising as a result of operations on site. Minor injuries such as cuts and grazes etc. will be recorded in the accident book on site. Separate procedures will be used for different types of emergencies. An emergency at the site is defined by the site management as follows:

"Any incident which is likely to result in harm to human health or pollution of the environment or serious breach of permit conditions and serious detriment to the amenities of the locality."

5.1.2 For all emergency situations, the deposit of any further waste will be suspended where necessary to allow action to be taken safely. If necessary, staff and other users of the site will be evacuated to an area which is a safe distance away from the hazards. Staff handling the emergency will be provided with and trained to use the necessary PPE (personal protective equipment) unless the manager instructs them that the hazard is too severe and outside help is needed from the emergency services or specialist waste contractors. A visitor's book will be kept to check who is on site at all times.

5.2 Fire

5.2.1 No waste will be burnt, and no fires will be allowed on site. In the event of a fire occurring on site, the operator/site supervisor will exercise his judgement and extinguish the fire with the water hose or suitable fire extinguisher and/or call the fire service for assistance. Any fires will be reported to the EA on the working day that they occur. All staff will be evacuated from the site if necessary. Smoking is not permitted on site. Firefighting residues will be disposed of to a permitted waste management facility.

5.2.2 The site has a fire prevention plan (FPP) in place which has been prepared to in accordance with EA guidance to meet the following objectives:

- To minimise the likelihood of a fire happening;
- To aim for a fire to be extinguished within 4 hours;
- To minimise the spread of a fire within the site and to surrounding neighbouring sites; and,
- To minimise impact of fire on people, environment and businesses.

5.2.3 The FPP is referenced as Frank Mercer and Son Fire Prevention Plan 001

5.2.4 For quick reference, the following actions will be taken when fire is detected or suspected (Site operatives):

a) DON'T PANIC
b) RAISE THE ALARM (IF NOT DONE SO ALREADY)
c) NOTIFY THE SITE MANAGER (IF SAFE TO DO SO)
d) **DO NOT TRY TO TACKLE THE FIRE YOURSELF UNLESS YOU ARE TRAINED IN DOING SO AND YOU ARE SURE OF THE NATURE OF THE FIRE**
e) LEAVE THE USING THE MAIN ACCESS GATES AS QUICKLY AND AS ORDERLY AS POSSIBLE
f) ASSEMBLE AT THE SPECIFIED FIRE ASSEMBLY POINT WHICH IS LOCATED BY THE SITE ACCESS GATES.
g) THE SITE MANAGER OR DELEGATED OPERATIVE WILL BE IN CHARGE OF CALLING THE EMERGENCY SERVICES ON A999" AND ENSURING THAT ALL PERSONS WHO WERE WORKING ON THE SITE OR WHO SIGNED IN TO THE VISITOR'S BOOK ARE ASSEMBLED SAFELY
h) INFORM ALL NEIGHBOURING PREMISES WHO ARE LIKELY TO BE AFFECTED
i) INFORM THE ENVIRONMENT AGENCY
j) DO NOT RETURN TO THE SITE UNTIL YOU HAVE BEEN GIVEN THE ALL CLEAR BY THE EMERGENCY SERVICES AND THE SITE MANAGER

5.3 Breakdowns

5.3.1 In the event of plant breakdowns, alternative plant will be sourced until the existing plant is repaired to prevent potential over stockpiling of waste. If an alternative plant cannot be used then waste will be stored securely until the plant is repaired and if necessary, waste will be diverted to an alternative site. The repair will be carried out at the most convenient location with absorbents used to clear oil or fuel spillages; most likely on the concrete surface.

5.3.2 Essential spares for plant maintenance are kept on site to ensure a repair can be carried out efficiently.

5.4 Spillages

5.4.1 Fuel which may be stored on site will be contained within a bunded receptacle/container to contain any primary leaks. If any oil and vehicle maintenance chemicals are kept on site, they will be stored securely. In the event of a spillage a spill containment kit (absorbent pads, booms or granules) will be used to prevent further spillage and the contaminated absorbents placed in a skip for disposal to a suitably permitted facility.

5.4.2 Any wastes which would be classified as having the potential to cause polluting runoff are stored within the concrete area which is a sealed drainage system.

5.4.3 All site surfaces will be inspected daily for the presence of spillages when the site is in operation. Debris will be swept as required and placed in a skip for further processing on site and sent to a suitably permitted site.

5.4.4 All wastes liable to give rise to contamination will be removed from the site within an EA agreed timescale.

5.5 Drums

5.5.1 The deposit of drummed waste will not be allowed at the site. If a drum is concealed and is not observed until the waste is deposited in the waste transfer area then the following procedure will apply:

a) The staff member will visually check the condition of the drum from a safe distance, noting any labels referring to the possible contents or hazards.
b) The site manager will be contacted to verify the observations and to decide on further action.
c) The producer of the waste and the EA will be contacted for advice and further information if necessary and both will be informed that a breach of the Duty of Care and site permit conditions has occurred as the result of the unauthorised deposit.
d) No further waste will be deposited until the emergency has been dealt with.
e) All spillages will be cleared using a spill containment kit and all contaminated absorbents placed in a skip for disposal to a suitably permitted waste management site.
f) If the deposit results in serious reactions with other waste or harmful emissions or the drum contents cannot be identified, then the emergency services and/or specialist waste contractors will be brought in to assist. If necessary, staff will be evacuated from the site or to a safe area within the site and all occupants of neighbouring properties will be informed.

5.6 Adverse reactions

5.6.1 No wastes are accepted which will react to present such a hazard. If unauthorised waste is found in a load and does present such a hazard the same procedures as for the deposit of drums (above) shall apply.

5.7 Staff shortages

5.7.1 In the event of unforeseen staff shortages arising from illness, suspension or no shows, the operator will make a judgement whether to reduce the number of incoming loads and divert

material to an alternative site. The operator will then seek further employment within a timely manner to ensure the site can continue to operate at its required capacity.

5.8 Adverse weather conditions

5.8.1 **High winds (>30mph)** - There will be reduced sorting, processing or treatment of any wastes which are likely to be blown around during conditions of high winds. Vehicles leaving the site will be sheeted to comply with the requirements of the Duty of Care legislation.

5.8.2 **Poor visibility** - The site will reduce external operations in conditions of poor visibility such as dense fog to reduce the risk of vehicle collision.

5.8.3 **Droughts / warm weather** – There are procedures set out in the operator's FPP which detail stock rotation procedures and how waste will be monitored during these events.

5.8.4 **Long periods of rainfall or flood events** – Due to the site's surface and waste types accepted, the potential for mud tracking off site is considered to be low, however, all vehicles will undergo a stringent check and vehicle chassis may be sprayed using hoses to reduce the risk of mud tracking off site. If this isn't suitable, the operator would source a road sweeper until weather conditions improve.

5.8.5 The operator will set up a notification alert with the Met Office to receive prior notifications of the above unforeseen adverse weather conditions to ensure mitigation can be put in place prior to the event. The site may be forced to close during events which could cause a significant risk to staff, human health or the environment.

5.9 Closure of destination sites

5.9.1 In the event of destination site closures or seasonal demands for wastes leading to a longer storage duration, the operator can divert incoming waste and send stored waste to an alternative site or use the EA's public register for alternative sites who could take this material and then contact the destination site. The operator has more than one contract set up for outlets of material to plan for this event.

5.10 Operational failure

5.10.1 The manager will be contacted by staff in the event of any operational failure such as the breakdown of plant, systems or equipment and will decide whether operations are to continue or be suspended prior to corrective action being taken. Serious operational failures, which result in the closure of the site, will be recorded in the site diary.

5.11 Bomb scare

5.11.1 In the unlikely event of a bomb scare, the site will be evacuated, and the police contacted. The police will then assume control of the site until the threat has been verified or the device defused and removed. The EA will be kept informed of the events on site.

6 Adapting to climate change & weather conditions

6.1 Climate change

6.1.1 The Met Office UK Climate Projections (UKCIP) has developed scenarios of climate change, which are summarised as:

- Warmer, wetter winters
- Hotter, drier summers
- Increased frequency and intensity of extreme weather (storms, droughts, intense downpours)

6.1.2 Reflecting these, the UK Climate Change Risk Assessment (CCRA) identifies a number of priority risks and opportunities. The likely direct climate change-related threats that can be considered to be of most relevance to minerals planning and management are:

- increases in the probability and severity of flooding (fluvial, groundwater, surface);
- exposure to high temperatures and heatwaves; and
- shortages in availability of water.

6.2 Flood risk / increased rainfall

6.2.1 The site is within Flood Zone 1 which is classified as the lowest probability and risk of fluvial flooding. It is also identified on as being at very low risk of surface water flooding.

6.2.2 The site is located within an industrial area on developed land comprising a concrete pad & buildings and no new construction is proposed.

6.2.3 Therefore, it is considered that the site is not at risk from flooding and would not increase the risk of flooding elsewhere.

6.3 High temperatures and heatwaves

6.3.1 Dry weather periods may increase risk of dust arising from processing operations and waste storage. As outlined in this EMS, a range of dust mitigation measures would be employed at the site including the sheeting of vehicles, dampening down of site surfaces, regular sweeping, and limiting stockpile and drop heights.

6.3.2 The retention of vegetation surrounding the site may also provide a degree of shelter from wind and help to reduce the risk of dust being blown off-site, while also providing for carbon sequestration.

6.4 Availability of water

6.4.1 The water use on site would be utilised for the treatment activities, dampening of surfaces and during dry and windy conditions. Mains water will be used for this purpose.

6.5 Weather conditions

6.5.1 The site is set up to receive weather alerts from the Met Office for the following weather conditions which could cause a potential complaint off site or potential breach of permit:

i) Prolonged periods of heavy rainfall causing mud and surface water ponding; this could also lead to waste becoming wet and causing odour.
ii) Periods of cold weather leading to stockpiles freezing reducing processing operations causing over stockpiling of waste.
iii) High winds creating a risk of litter and dust escaping beyond the site boundary.
iv) Droughts or periods of hot weather which could lead to water shortages, hosepipe bans and excessive dust.
v) Dense fog leading to poor visibility causing accidents.

6.5.2 The site will install the following preventative measures to ensure the above do not hinder operations:

HEAVY RAINFALL

- Vehicles exiting the site will undergo a more thorough check to ensure mud is not tracked off site.
- Should long periods of rainfall be likely, the site has access to (as a result of daily inspections) a road sweeper to cover the wet period to ensure surfaces are swept thoroughly throughout the day.

HIGH WINDS

- During conditions of high winds (>30mph) the site will monitor the impacts of dust and implement the measures detailed within Section 4.4.
- Vehicles leaving the site will be sheeted to comply with the requirements of the Duty of Care legislation.
- Stockpiles will be reduced to a suitable height to prevent the material escaping beyond the site boundary.

DROUGHTS/WARM, DRY WEATHER

- In extreme cases such as a hosepipe ban or water shortage, the site will ensure there is additional water available to ensure treatment activities and mitigation techniques can still function.
- For periods of prolonged dry conditions, stockpiles and processing heights may be reduced to a suitable level to reduce the risk of dust.
- If the above measures are not suitable, the site may look to install additional measures.
- Where dust is becoming a major concern then the operator will stop processing the material and cover the piles using tarpaulin until conditions or dust suppression techniques are considered effective.

DENSE FOG (POOR VISIBILITY)

- The site will reduce operational intensity during conditions of poor visibility such as dense fog to reduce the risk of vehicle collisions or other potential accidents.

6.6 Conclusion

6.6.1 The options to mitigate and adapt to climate change are also limited. The options identified in this section are considered to be proportionate, practicable and deliverable and it is considered this site would not be affected by climate change or adverse weather conditions.

7 Training for site staff

7.1 Training needs assessment

7.1.1 All new and existing site staff are subject to a specific training regime based on their responsibilities at the site to ensure all operations are carried out without harm to the environment or amenity of the surrounding area. Training in all aspects of the site and waste operations at the site with regard to the individual responsibilities of the site staff will help to prevent incidents occurring which may have an adverse impact on the environment and/or the employees and their co-workers.

7.1.2 An employee training matrix will be available at the site and shall provide a comprehensive checklist for the training needs of all new site staff and also serves as a training review for existing site staff which will be carried out annually or a period set at the operator's preference.

7.2 Site rules and infrastructure training

7.2.1 This information is provided to all employees, visitors and contractors with a full understanding of the site's conditions of use, which is communicated and documented at induction for all staff with specific induction for visitors and contractors.

7.2.2 Competency should be demonstrated within this field to ensure the employee is fully aware of the site's surroundings and operations to ensure their safety and compliance with specific operating conditions at the site.

7.3 Emergency procedures training

7.3.1 All employees are required to be familiar with the Environmental Controls in Section 4.0 and the Emergency Procedures as detailed in the Section 5.0.

7.3.2 In addition to normal operating conditions as specified in the site rules, employees must also be trained in dealing with eventualities which may occur outside the scope of normal operating conditions, so they are aware of how to deal with these situations in advance of an occurrence.

7.4 Fire safety / firefighting training

7.4.1 Management must provide all employees with appropriate fire safety training with regard to their individual responsibilities.

7.4.2 Emergency procedures detailing what measures employees should adopt should a fire occur at the site are detailed in Section 5.2 and are covered by the 'emergency procedures' training (see Section 7.3).

7.4.3 Regular fire drills are undertaken by site management to ensure proper procedures are followed by employees in the unlikely event that a fire incident occurs**.** These will be unannounced drills and will not form part of the induction or review training as specified in Section 7.1.

7.5 Recognition of waste types training

7.5.1 All employees are given induction training and subsequent regular training to identify those waste types which are permitted for acceptance at the site under the site's EP and those wastes which are not. This will include specific training to identify those common wastes which may be found following deposit and are not permitted at the site and will also include more obscure wastes and how to handle these wastes safely. All employees are advised that they should refer any unrecognisable or unknown wastes to senior management, who should, in turn, follow procedures outlined in the EMS and/or contact the EA to agree a suitable method for removal.

7.5.2 Training is provided to all site users who handle waste on site and those in charge of administration and reporting. In-depth training will also be provided to drivers responsible

for collecting wastes from the site of production in accordance with Section 3.0. They will be trained to identify any wastes not covered by the EP for the site and inform the producer that an alternative facility must be sought for any non-compliant wastes.

7.6 Storage areas / limits training

7.6.1 Those employees who carry out their responsibilities at the site and those in senior posts must be trained to identify appropriate waste storage areas to ensure that waste storage operations comply with the requirements of the EP for the site.

7.6.2 Employees in these roles must also be trained to recognise storage limits to ensure that they are in accordance with those specified in the EP.

7.7 Vehicle / plant preventative maintenance training

7.7.1 This training is provided specifically for the vehicle and plant operators in order to ensure that all plant and machinery is checked regularly to prevent any occurrences which may lead to any adverse impacts on the environment or human health.

7.7.2 Training will be in accordance with this document and will be based on the preventative maintenance schedule supplied by the plant/equipment manufacturer.

7.7.3 The same training will be provided to senior management enabling a dual-level maintenance programme.

7.8 Duty of care training

7.8.1 All employees dealing with consignments of waste are trained in the completion of Duty of Care Waste Transfer Notes and the appropriate auditing of destination sites and/or contractors to ensure compliance.

7.9 Plant operation training

7.9.1 Any employees who are required to operate loading or treatment plant for the movement or processing of waste will be required to undertake the necessary qualifications for the operation of the specific item of plant in question. This will be required prior to operating the plant and will be obtained through necessary external certification programmes.

7.9.2 Regardless of general plant operation certification, all operatives will be fully inducted in the operation of the specific make and/or model of plant used on site.

7.10 Permit / management System

7.10.1 All employees will be inducted into the operating conditions as prescribed in the EMS for the site. Whilst much of the above training will provide specific guidance on many aspects of these documents, all employees will be made aware of the location of the EMS in the site office. All managerial positions will be made fully aware of the site's operating conditions.

7.11 Training for contractors

7.11.1 General site training will be provided to any contractors who are working on the site on a temporary basis as described in Sections 7.2, 7.3 and 7.4 above.

7.11.2 Additional training will be provided to contractors in their area of expertise. If they are dealing with specific items of plant/machinery, site operating conditions and a general understanding of the EP conditions will be provided to prevent any adverse impacts on the environment.

Appendix I

Drawings

Note
The Installation comprises two physically separate but operationally linked areas under the same company control, both included within the red-line boundary shown on Drawing One

- Main Waste Treatment Area
- Weighbridge Area.

Although separated by a public roadway, they operate as a single installation under unified management. All waste reception, storage and treatment activities are confined to the Main Waste Treatment Area, while the Weighbridge Area is used solely for weighing incoming and outgoing waste as part of the waste acceptance procedure, with no waste storage or treatment taking place there. (Other than temporary quarantined goods)
Adjacent land outside the red-line boundary is used only for finished DPM storage and HGV parking, and no waste activities are undertaken outside the defined Installation boundary.

Drawing One

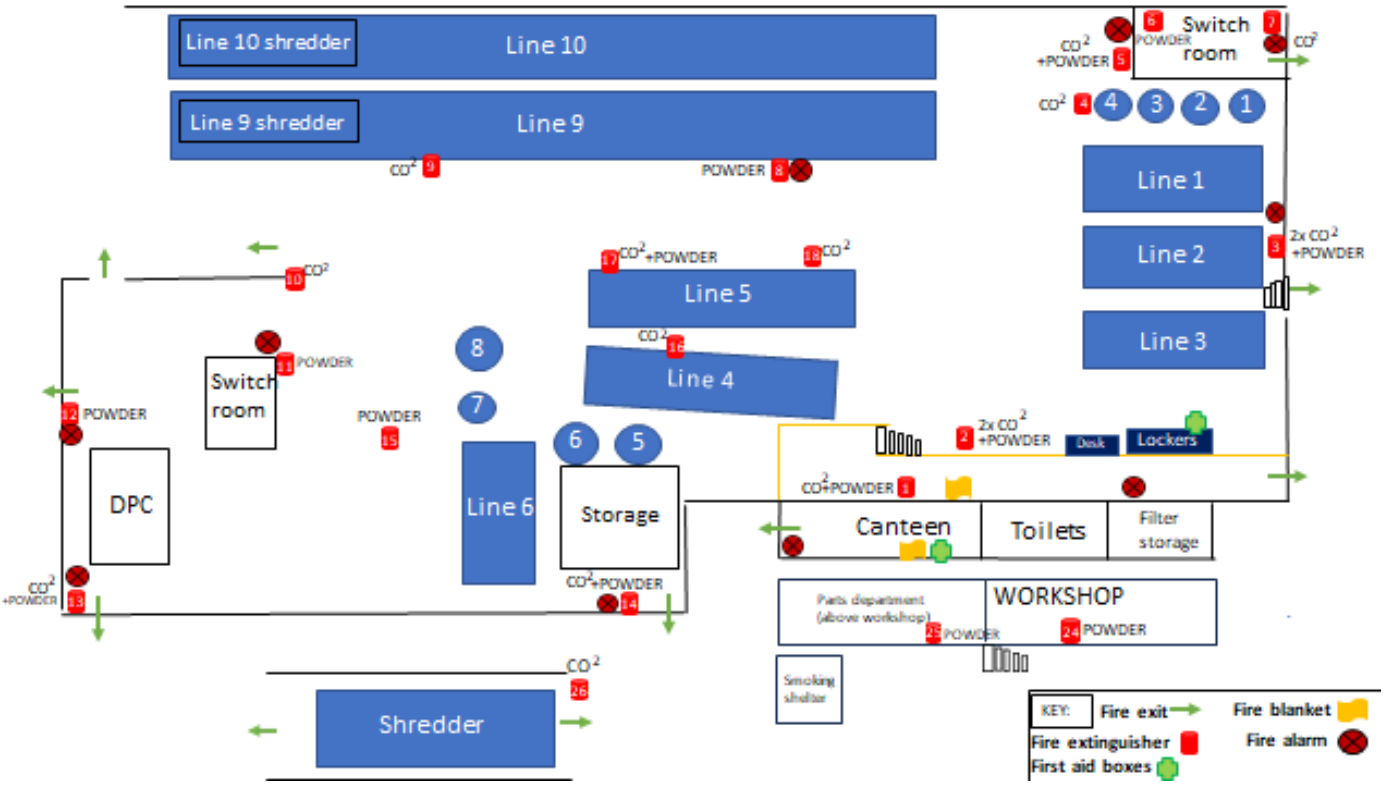
Site Plan for

Frank Mercer Sons Ltd, Chequerbent Works, Manchester Road, Over Hulton, Bolton, BL5 3JF



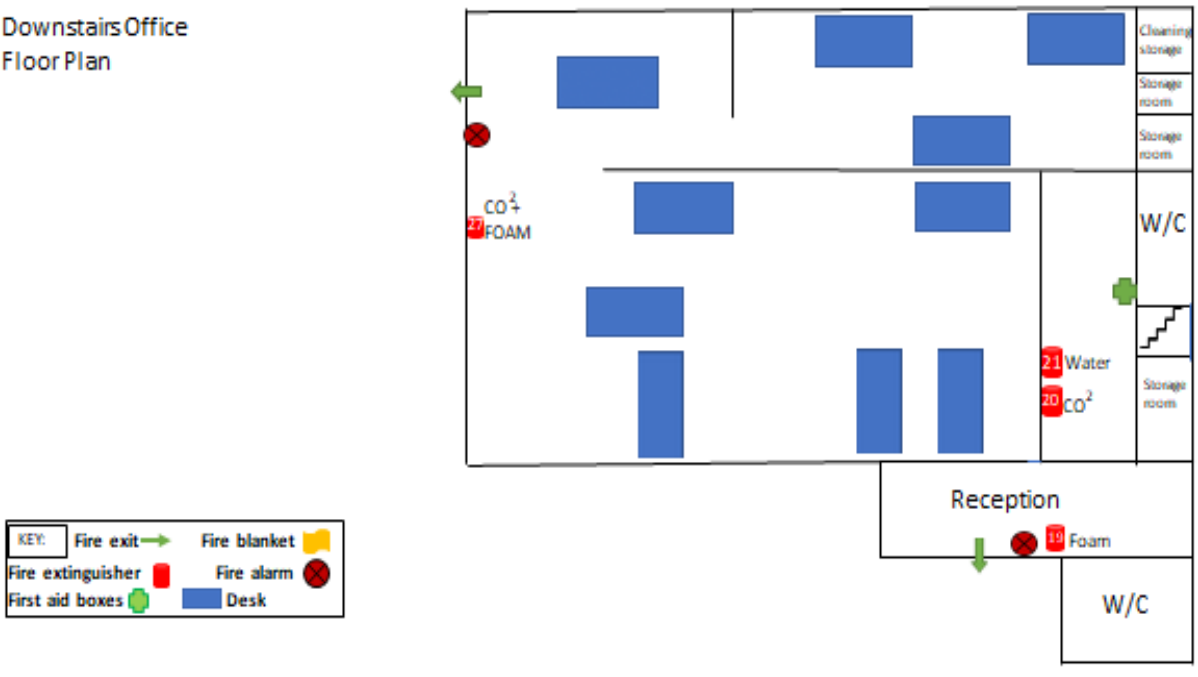
Drawing Two

Fire Plan Layout of the site



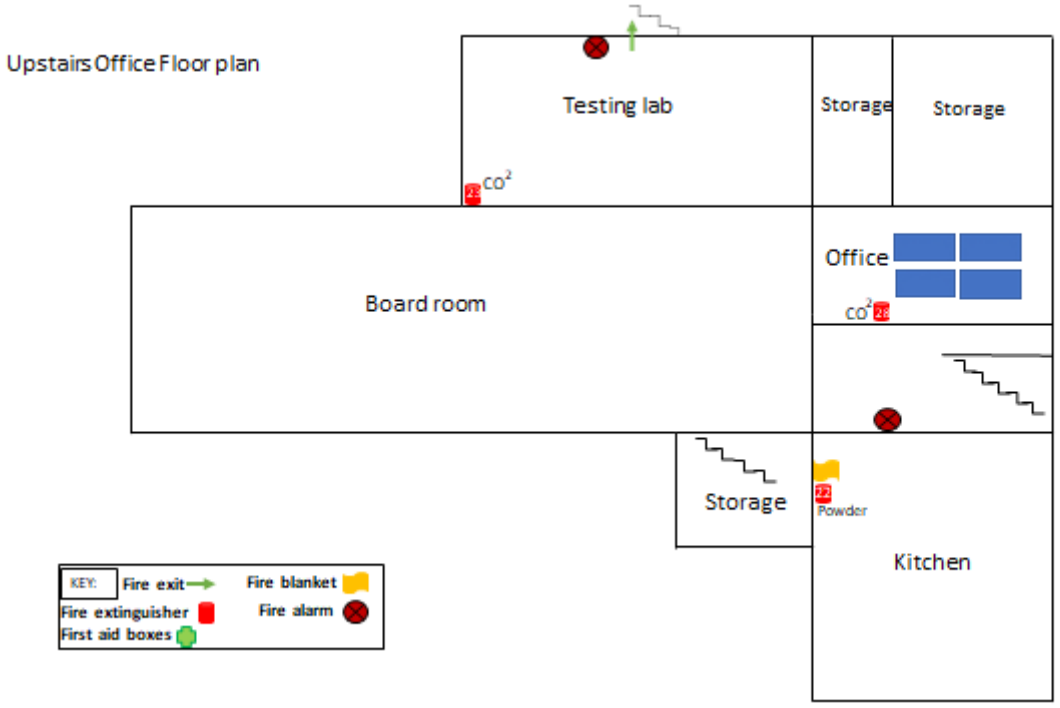
Fire Plan Layout of the Downstairs Office

Downstairs Office
Floor Plan



Drawing Two (Continued)

Fire Plan Layout of Upstairs Office





OVERALL SITE PLAN

Drawing Three

Appendix II

Record Keeping Forms

Use of Record Keeping Systems

The record keeping forms included in this appendix are illustrative examples of the format used to demonstrate compliance with the Environmental Permit and applicable legislation. The operator may utilise alternative formats, including electronic or cloud-based systems, provided that such systems record all required information and meet the requirements of the Environmental Permitting Regulations, Duty of Care obligations, and this Environmental Management System. All records will be retained for the required statutory period and made available to the Environment Agency upon request.

FRANK MERCER & SONS

WASTE INPUT RECORD FORM - FM/RF/1 **DATE: ……**

TIME	PRODUCER/ SOURCE	WASTE TYPE	QUANTITY (TONNES/ m^3)	NAME OF CARRIER	DRIVERS NAME	DRIVERS SIGNATURE	VEHICLE REG. NO.	WASTE ACCEPTED/ INSPECTED BY
TOTAL FOR THIS SHEET								
TOTAL FROM PREVIOUS SHEET				SHEET No. OF . CHECKED……				
TOTAL WASTE DEPOSITED								

Appendix II

FRANK MERCER & SONS
REJECTED WASTE - RECORD FORM FM/RF/2

DATE	
TIME	
WASTE DESCRIPTION	
QUANTITY OF WASTE	
PRODUCER/HOLDER'S NAME, ADDRESS & TELEPHONE No.	
NAME OF CARRIER	
VEHICLE REGISTRATION	
CARRIER REG. No.	
REASON FOR REJECTION OF WASTE	
ACTION TAKEN	

FRANK MERCER & SONS

WASTE AND PRODUCT OUTPUT RECORD FORM - FM/RF/3 **MONTH.....**

DATE	TIME	WASTE TYPE	QUANTITY (TONNES)	DESTINATION SITE	NAME OF CARRIER OR EMPLOYEE REMOVING WASTE	VEHICLE REG. NO.
TOTAL FOR THIS SHEET						
TOTAL FROM PREVIOUS SHEET				SHEET No. OF . CHECKED.....		
TOTAL WASTE EXPORTED						

Appendix II

FRANK MERCER & SONS
SITE INSPECTION FORM (DAILY INSPECTIONS) – FM/RF/4

WEEK STARTING								
TYPE OF INSPECTION		**DAY**						
		M	**T**	**W**	**T**	**F**	**S**	**S**
SITE ENTRANCE/NOTICE BOARD								
SECURITY - GATES								
SECURITY - FENCING								
SITE ROADS (CLEAR FROM HAZARDS)								
WASTE TRANSFER BUILDING - SIDES/ROOF								
IMPERMEABLE CONCRETE AREAS (INTEGRITY)								
DRAINAGE – GULLY'S, MANHOLES								
WASTE CONTAINERS & BAY WALLS								
WASTE STORAGE LIMITS	PLASTIC							
WASTE STORAGE LIMITS	REJECTED WASTE							
REJECTED WASTE TYPES / STORAGE								
NOISE LEVELS								
FIRES (ANY INCIDENTS REPORTED)								
QUARANTINE SKIP								
NO SMOKING SIGNS IN PLACE								
FIRE FIGHTING EQUIPMENT								
PLANT/EQUIPMENT MAINTENANCE CHECKS								
SPILL KITS								
OFFICE/WELFARE FIRE RISKS CHECKED								
FUEL TANK/BUND								
LITTER								
DUST								
ODOUR								
VERMIN								
RECORDS								
WEATHER I.E. HEAVY RAINFALL, HIGH WINDS								
COMPLAINTS RECEIVED								
OTHER (SEE NOTES BELOW)								
INSPECTION CARRIED OUT BY								

NOTES/ACTION (CONTINUE ON A SEPARATE SHEET IF NECESSARY):

CHECKED BY		**SIGNATURE**	
POSITION		**DATE**	
Sheet		***of***	

FRANK MERCER & SONS - EMPLOYEE TRAINING NEEDS ASSESSMENT / REVIEW

EMPLOYEE NAME				DATE COMPLETED			
POSITION				REVIEW DUE			
TRAINER				OUTCOME	PASSED		
POSITION					FURTHER TRAINING REQUIRED		
CARRIED OUT /SIGN OFF >	Y/N	SIGNED BY EMPLOYEE	SIGNED BY TRAINER		Y/N	SIGNED BY EMPLOYEE	SIGNED BY TRAINER
ENVIRONMENTAL PERMIT				FIRE PREVENTION & MITIGATION PLAN			
MANAGEMENT SYSTEM				FIRE SAFETY			
SITE RULES				EMERGENCY PROCEDURES			
RECORD KEEPING / TRANSFER NOTES				STORAGE /PILE SIZE LIMITS			
RECOGNITION OF WASTE TYPES				STORAGE DURATION			
SECURITY				FIRE DETECTION			
VEHICLE CHECKS				FIRE ALARMS			
PLANT OPERATION				FIRE FIGHTING EQUIPMENT			
PLANT CHECKS				FIRE WATER CONTAINMENT MEASURES			
AMENITY - LITTER, ODOUR, PESTS etc.				SPILL CLEARANCE			
NOTES AND ACTIONS:							

FRANK MERCER & SONS
COMPLAINTS REPORT FORM (FM/RF/6)

Date Recorded:	**Reference Number:**
Name and address of caller	
Telephone number of caller	
Time and Date of call	
Nature of complaint (noise, odour, dust, other) (date, time, duration)	
Weather at the time of complaint (rain, snow, fog, etc.)	
Wind (strength, direction)	
Any other complaints relating to this report	
Any other relevant information	
Potential reasons for complaint	
The operations being carried out on site at the time of the complaint	
Follow Up	
Actions taken	
Date of call back to complainant	
Summary of call back conversation	
Recommendations	
Change in procedures	
Changes to Environmental Management System (EMS)	
Date changes implemented	
Form completed by	
Signed	
Date completed	

COMPLAINT RECORDING PROCEDURE:

Any complaints received will be recorded on form FM/RF/6. This form will normally be completed, signed and dated by the Site Manager; if they are not available the Office Manager will complete the form.

1) The name, address and telephone number of the caller will be requested.

2) Each complaint will be given a reference number.

3) The caller will be asked to give details of:

    a) the nature of the complaint;
    b) the time;
    c) how long it lasted;
    d) how often it occurs;
    e) Is this the first time the problem has been noticed; and
    f) what prompted them to complain.

4) The person completing the form will then, if possible, make a note of:

    a) the weather conditions at the time of the problem (rain, snow, fog etc.);
    b) strength and direction of the wind; and
    c) the activity or activities taken place on the site at the time the noise was detected, particularly anything unusual.

5) The reason for the complaint will be investigated and a note of the findings added to the report.

6) The caller will then be contacted with an explanation of the source of the complaint if identified and the action taken to prevent a recurrence of the problem in future.

7) If the caller is unhappy about the outcome or unwilling to identify themselves the caller will be invited to contact the EA and or the Local Authority.

Note: Following any complaint the relevant management plan(s) will be reviewed to ensure appropriate actions are in place to counter any problems.

Appendix III

List of Plant and Machinery

2025 Plant List

Film lines:

OZGULMAK 150 Extruder - 750mm die.
OZGULMAK 150 Extruder - 750mm die.
OZGULMAK 150 Extruder - 750mm die.
Witmack Zocchi 120 extruder 1993 – Serial no. 0574 - 800mm die
Dolci 140 extruder 1997, Serial no. 979164 - Gioldi 750mm die
CMG 60mm & Winder.
5x 1600mm roll-o-matic winders
1x 2000mm roll-o-matic winder
3x PARS Control Hopper loader systems
1x Jenco Hopper loaders (Line 4)
2x Jenco Hopper loaders (Line 5)
Cardinal scales x5
Gravimetric dosing system (Line 4)
Contact packaging pallet wrapper 2018 – Serial no. P1812A177 – Model: TMD-P26B

DPC:

Zocchi 120 Extruder 1995 - RAJOO embosser & winder 2022
ALS logger 425 stec-D s/n 0465
ALS logger 300 stec s/n 277
Contact packaging pallet wrapper 2022 – Serial no. P22A385 – Model: TMD-P26B

RECLAIM:

Erema 180 - Interema 2018 TVE PLUS
Erema 180 - Interema 2018 TVE PLUS
8x 10 tonne silos
2x Linder Micromat 2000 shredder
Bronneberg Hydraulic Guillotine 2022 – Type G35 - Order no. 70220622- Model: 2000

SWITCH-ROOM:

3 x Power Factor Corrector
Autool Grinders blade sharpener – Serial no. OPB 850/0439/20
1x Worthington Creyssensac RLR 50v CE - 2022 – Serial no. ITJ632661
1x Worthington Creyssensac RLR 1500A – Serial no. CA1586322
1x BOGE S40-2 – Serial no. 228197490/001

TRANSPORT:

4 x trailers
1 x Double-decker trailer
Curtain sider for skip wagon
1x Serpack pallet wrapper

YARD:

Vertical Baler
Weighbridge
WEIMA WL18 shredder
Beringer Organic Coatings Burn Off Furnace
5 x 20 40cu yd roll off skips

FORKLIFT TRUCKS (FLT)

1x 2020 TCM YG1D2A30H – Serial no. YG1D2E705982
1x 2019 TCM Y1D2A20H – Serial no. Y1D2E706639
1x 2020 TCM Y1D2A25H – Serial no. Y1D2E707549
1x 2020 TCM Y1D2A25H – Serial no. Y1D2E707548
1x TCM FD25E2 – Serial no. SH18E-50371
1x TCM FD25E2 – Serial no. SH18E-50372
1x TCM FD25E2 – Serial no. SH18E-50598
1x 2014 JCB TLT30D TCR – Product ID no. JCBTLT30T02318256

Sampling Area:

Dini Argeo 3590 EGT Scales
TSC Printer
LP7510 Scales

OTHER:

Universal tester ray ran
3x Transformers
Voltage Converter
Arvor Bag Machine 2004 – Type 1199 CLASSIC
Plastic lumber lining machine
Posch Schalprofi 500
Ray-Ran MFR100 Melt flow Indexer
AML Dart Drop Tester
TCM Electric Powerlift

Appendix IV

Health & Safety – Conditions of Site Use

HEALTH AND SAFETY - CONDITIONS OF SITE USE

The following guidelines apply to all site personnel, contractors and visitors using the site (where applicable).

1) The site is covered by the Health and Safety at Work Act 1974 and its associated regulations and all users must abide by any relevant provisions. Any person found to be in contravention of the requirements of this Health and Safety Statement will be asked to leave the site.

2) All visitors and contractors must sign the visitor's book upon entry to and exit from the site. All vehicle drivers must report to the office and await instruction from the site manager/deputy before proceeding to deposit waste at the site.

3) All accidents, diseases, injuries or dangerous occurrences shall be reported to the site manager. All instructions issued by the site manager in respect of health and safety at the site must be followed by all site users.

4) A first aid box (including eye-wash bottles) is kept in the site office. If you are injured on site please alert a member of staff/trained first-aider for assistance.

5) All persons must wear the appropriate PPE on site including high visibility jackets and hard hat.

6) Safety boots must be worn by all persons in the waste sorting/storage areas.

7) Protective gloves must be worn for any operations which present a hazard of puncture to or laceration of the skin or for any manual handling work carried out on site.

8) Ear defenders, safety helmets (hard hats) and eye protection will be issued when deemed necessary and must be worn by all employees and contractors where required by the site manager or other site representatives.

9) Fire extinguishers are kept on site to deal with any fires - fires shall only be dealt with by employees of Frank Mercer & Sons unless alternative instructions are given by the site manager. Access to fire exits and firefighting equipment must be kept clear at all times. When the fire alarm sounds please follow instructions and leave the site in an orderly fashion.

10) Persons who are suspected to be under the influence of drugs or alcohol will be removed from the site.

11) Smoking is not permitted on the site.

12) Observe and follow all traffic directions and traffic/safety signs.

13) Drivers must comply with all safety instructions given by the site manager or appointed deputy.

14) All drivers are responsible for ensuring that their vehicle is safely loaded. Unsafe loads will not be accepted at the site and will not be allowed to leave the site until they have been made safe.

15) Drivers waiting to tip at the recycling centre shall follow the instructions of the operator and shall only tip in the designated area, unless advised otherwise. No tipping shall take place over sorted stockpiles.

16) Drivers must remain in the cab or stand well clear of the vehicle during loading or tipping. Once the vehicle has been loaded it must be securely sheeted (if necessary) before leaving the site. When sheeting and unsheeting the vehicle ensure that the engine is switched off, the ignition key removed and the parking brake is on. Do not gain access using the mudguards and wheels. Ensure that your ropes, hooks and sheets are in good condition.

17) Never travel with the vehicle body raised. Ensure you know the maximum height of the raised body of your vehicle.

Declaration: To be completed by site users

I have read and understand the conditions of use for this site and agree to comply with them at all times. I accept that neither Frank Mercer & Sons nor their employees shall be liable for any loss or injury arising from my non-compliance with the above conditions.

Signed..... Print name.....

Company/Organisation..... Date.....

Note: these conditions are included in the EMS for information only and may be revised regularly as part of the site health and safety policy.