Environmental Management System

NB Clark Ltd

Butterwell DP Recycling Centre

Longhirst

Morpeth

Northumberland

NE61 3NF

EPR/LB3004MK/A001

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Issue and Revision Record

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1.0 Site Introduction

This Management System has been prepared to identify and minimise the risk of pollution, including those arising from operations, maintenance, accidents, incidents, nonconformances, closure and those drawn to the attention of the operator/site management as a result of complaints; and carried out under the environmental permit issued to the company.

1.1 Drawings

The site permitted boundary is shown within the permit.

Drawing 001 Location Plan

Drawing 003 Site Layout Plan

1.2 Site Activities

Permitted waste management activities are listed within the permit.

The following activities are authorised on site;

The annual permitted tonnage will be 150,000 tonnes.

1.4 Water, Gas, and Electricity

There is no gas supply within the permitted area.

There is water supply within the building, the water stop tap is located within the workshop.

The electricity isolation switch and fuses are located out of the permitted area in an adjoining business.

1.5 Permitted Wastes

The site will accept waste listed in Table 2.2 of the permit - TBC

1.6 Site Layout and Drainage

The Site Layout Plan.

The site office/weighbridge is located inside of the permitted area.

All site surfaces used for waste storge are made up of hardstanding as permitted under the environmental permit. There is no drainage on the permitted area.

1.7 Hours of Operation

Operating hours will be: Monday to Friday - 07:00 to 18:00 hours, Saturday - 07:00 to 14:00 hours, Sundays and Bank Holidays – no working.

1.8 Site Notice Board

A notice board will be erected at the site entrance, displaying the following information:

- The site name and address;
- The name of the permit holder and operator;
- The Environmental Permit number and accompanying statement stating that the site is permitted by the Environment Agency.;
- Environment Agency contact details, Emergency No. 0800 80 70 60 and General Enquires No. 03708 506 506;
- Operator's "out of hours" emergency contact;
- Operating hours.

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

1.9 Staff and Site Management

The table below details the minimum number of staff when the site is open for the reception and processing of waste.

Position	Employees	Responsibilities
Site Manager/TCM	X 1	Ensuring the site is being operated in accordance with Environmental Permit
Site operatives	X 3	Waste handling/processing, reception and plant operation
Drivers/Plant operators	X 5	Waste receipt, waste movements, tipping and deliveries

1.10 Staff Training

Staff and temporary staff employed will receive appropriate training to enable them to carry out their role safely and effectively, also to allow the site to be operated within the current legislation and guidelines and also to ensure company procedures are followed.

Records of training will be kept and updated accordingly.

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

1.11 Document Control

This document is considered to be a 'working' document that will be reviewed and updated annually (if required) or as required should any of the following occur:

- the results of any testing of this document indicate that changes are required;
- a change or review of legislation;
- a change in site operations; or
- if the site is instructed to do so by the EA.

1.12 Reporting

Within one month of the end of each quarter, the operator shall submit to the Environment Agency using the form made available for the purpose, the information specified on the form relating to the site and the waste accepted and removed from it during the previous quarter.

1.13 Notifications

The Environment Agency shall be notified without delay following the detection of:

(a) any malfunction, breakdown or failure of equipment or techniques, accident or emission of a substance not controlled by an emission limit which has caused, is causing or may cause significant pollution;
(b) the breach of a limit specified in these standard rules; or
(c) any significant adverse environmental effects.
Written confirmation of actual or potential pollution incidents and breaches of emission limits shall be submitted within 24 hours.

Where the Environment Agency has requested in writing that it shall be notified when the operator is to undertake monitoring and/or spot sampling, the operator shall inform the Environment Agency when the relevant monitoring and/or spot sampling is to take place. The operator shall provide this information to the Environment Agency at least 14 days before the date the monitoring is to be undertaken.

2.0 Site and Emergency Contacts

Name	Contact
Fire Service Emergency	999
Fire Service (Local)	01670 621111
Police Emergency	999
Police (Local)	01661 872555
Northumbrian Water	0800 328 7648
Environment Agency	0800 80 70 60
Northumberland County Council	0345 600 6400
Health and Safety Executive	0300 003 1747

3.0 Standard Operating Procedures

3.1 Emergency Procedures

An emergency is considered to be an event or incident that has, or has the potential to, cause immediate harm to the environment, employees, neighbours, on site property, neighbouring property, and/or result in a legal non-compliance that puts the company and its business at risk.

3.1.1 Fire

Any outbreak of fire at the site shall be treated as an emergency. In the event of fire, the following action will be taken:

- The fire brigade will be notified immediately, and the EA as soon as practicable;
- The burning area will be isolated and attempts will be made to extinguish the fire utilising the on-site fire extinguishers, if safe to do so;
- Contaminated site runoff will be isolated and prevented from entering any unsurfaced ground; and
- The site will be evacuated if the fire is not containable.

The area of fire must be evacuated without generating panic. Site personnel must ensure that no persons or vehicles re-enter the affected area. The emergency meeting point is opposite the site entrance.

3.1.2 Flooding

The site is not located in a designated flood zone.

3.1.3 Severe accident or fatality

In the event of a severe accident or fatality, the ambulance service should be contacted immediately.

The site's designated first aider will employ emergency first aid as appropriate.

Where an accident results in a casualty requiring an individual to be taken to hospital, the Health and Safety Executive (HSE) will be notified as soon as practicable.

3.1.4 Major spillage

In the event of a major spillage which has the potential to cause pollution or off-site contamination, the Operator/Site Management will immediately contact the EA via the incident hotline (**0800 80 70 60**) and the emergency services. Any staff or visitors will follow instructions and take appropriate actions taking into consideration the risks associated with the spilt substance.

If appropriate and safe to do so, action will be taken to prevent the transmission of the substance(s).

3.1.5 Communication

In the event of an emergency, the occupants of neighbouring properties will be contacted and advised of the incident, its severity and contingency arrangements that may include evacuation.

In all cases after an event, an **Accident and Incident Record** (5) is completed. An investigation may be carried out by the Operator/Site management or other designated person. The incident will be reported to the relevant authorities including:

- Environment Agency
- Health & Safety Executive
- Nothumbrian Water

3.1.6 Training

Suitable and sufficient training and information shall be provided to all relevant employees in order that they are aware of their duties in an emergency situation. Such training shall be recorded and updated as required in the Training Matrix or physical records held in the site office.

3.1.7 Testing and Reporting

Records shall be kept of maintenance and testing of safety equipment.

Evacuation drills and mock spill incidents and accidents shall be staged at six monthly intervals. The Operator/Site Management shall maintain a record of these.

3.2 Waste Acceptance

The following procedures outline the pre-acceptance and acceptance measures that will be followed at all times.

Waste shall only be accepted.

(a) it is of a type listed within the permit;

(b) it conforms to the description in the documentation supplied by the producer and holder;

(c) it is visually inspected on arrival and before it enters the treatment process to ensure that it complies with the permit.

Records demonstrating compliance for the acceptance of permitted wastes (including analysis and assessment of any excavated/inert wastes from potentially contaminated sites) shall be maintained.

3.2.1 Pre-acceptance procedures to assess waste

The company follow the below controls in relation to pre acceptance, applying the following criteria to decide upon the acceptance or rejection of a consignment of waste.

The process of making sure the correct materials enter the site starts from the sales process. A phone call is made to head office requesting a waste service to be provided. The customer will be advised by the trained sales/office team or senior management as to what can be tipped at our site and our strict acceptance procedures.

NB Clark will then request the following information from the customer:

- company/site name and address
- Process from which the waste arises
- the source of the waste (the producer's business and the specific process that has created the waste)
- information on the nature and variability of the waste production process
- information about the history of the producer site if it may be relevant to the classification of the waste (for example soils and other construction and demolition arisings from a site contaminated by previous industrial uses)
- the waste's physical form
- the waste's composition (based on representative samples if necessary)
- a description of the waste's odour and whether it is likely to be odorous
- an estimate of the quantity you expect to receive in each load and in a year
- EWC code and description
- anticipated volume
- WAC testing
- If available any site investigation/soil report relating to the material that they wish to bring to the site.

Bulk loads

Pre acceptance and additional waste classification of submitted testing may also be verified using WM3 and Haz Waste Online Classification and external consultancy support.

Ad Hoc Loads

The site may receive waste on an ad hoc basis. In those instances pre-acceptance checks will still be carried out before the waste is accepted. For example, through the exchange of information at the weighbridge before acceptance on site with any testing and in line with the above pre acceptance criteria demonstrated.

Sampling and assessment

Sample information is not required if the origin of the waste is reliably understood and it clearly shows that the waste is non-hazardous. However, a visual assessment alone will not be enough to assess whether mirror entry waste is hazardous or not.

If the waste is a mirror entry and has not been properly assessed, the company assume it is the hazardous entry as a precautionary measure. The pre-acceptance information will be verified by contacting or visiting the producer. Dealing with staff directly involved in waste production can help to fully characterise a waste.

Analysis of samples must be carried out by laboratories who are UKAS or MCERTs accredited for the prescribed testing.

Once the waste has been properly assessed and classified, the sales team or senior management, will assess the waste's suitability for storage and treatment at the site to make sure the waste is compliant with permit conditions.

The company will keep pre-acceptance records for at least 3 years, with records preferably held electronically, following receipt of the waste.

The company must reassess the information required at pre-acceptance if the:

- waste changes
- process giving rise to the waste changes
- waste received does not to conform to the pre-acceptance information
- In all cases NBC must reassess the information required at pre-acceptance on an annual basis.

In the event of third parties are delivering or removing waste from the site, the site manager/TCM will undertake a check of the relevant waste carrier's licence in place by verifying the waste carriers licence document.

Should there be the need to conduct further verification the licence can be checked to ensure that the vehicle is properly licensed by using one of the following methods:

- Contacting the Environment Agency on 08708 506 506 to request an instant Waste Carrier Validation Check; or
- Online on the Environment Agency's waste carrier register at: http://www.environment-agency.gov.uk/epr/search.asp?type=register.

If vehicles are arriving from the same company/under same contract the Waste Carrier Licence may cover all vehicles.

3.2.2 Waste Transfer Note

All deliveries to site are pre booked due to the nature of the business and in relation to capacity on site. A transfer note accompanies all incoming loads to site.

In the event of third parties delivering waste to site a transfer note is required to accompany incoming wastes.

Waste will be described in the waste transfer note with reference to the European Waste Catalogue (EWC) Codes with the appropriate code number. A copy of the list of wastes that can be accepted on site can be found in the site's environmental permit. The Site Manager and site operatives will be trained to identify a correctly completed waste transfer note.

Upon the receipt will check that the waste transfer note includes signed confirmations that the waste hierarchy has been applied correctly under the Environmental Permitting (England and Wales) Regulations 2010 (as amended). The waste hierarchy illustrates the most and least favoured options of disposal (1 being the most favoured):

1. Prevention;
2. Minimisation;
3. Reuse;
4. Recycling;
5. Recovery/energy recovery; and
6. Disposal.

All waste transfer notes will be kept for no less than 3 years.

3.2.3 Waste Acceptance Procedure

The following steps will be followed for all incoming wastes from customers. The Site Manager/TCM and any site operatives will be trained to understand and implement the following waste acceptance procedures:

1. Checks and validation that characteristics of the waste received matches the information provided to during waste pre-acceptance. This is to confirm the waste is as expected and that it can be accepted. If the waste does not conform to the pre-acceptance information, the Site Manager/TCM may still be able to accept the waste, but will must confirm first that the permit allows acceptance and that the waste can be treated appropriately. Otherwise, the waste will be rejected.

2. Checks will be made whether to accept waste, to ensure that the relevant storage areas and treatment processes on site can handle the waste. The decision will be made to reject the waste if capacity is not available, as this may be a breach of the permit by doing so.

3. A visual check will be made of the incoming waste to verify them against pre-acceptance information and transfer documentation before acceptance on site.

4. A check and validation all transfer documentation will be undertaken with action taken to resolve discrepancies before acceptance. Any issues will be addressed with the waste producer or waste carrier (or both) during waste acceptance. Records will be made of any non-conformance.

The site has a procedure to identify non-conforming wastes and wastes to be rejected.

Senior management will handle any ongoing communications with waste producer/hauliers and take will measures to prevent the recurrence of non-conforming and rejected wastes. Records of these communications will be maintained.

Where any hazardous wate has been rejected, the site must follow the procedure set out in the waste rejection procedure.

Loads are weighed upon receipt (weighbridge system) and a weighbridge ticket produced, to confirm the quantities against the accompanying paperwork, unless alternative reliable and representative systems are available (for example, based upon density and volume).

Once the waste is initially accepted, it will then be tipped in the relevant storage area, and further inspected and validated against the waste transfer note. One copy will be held on-site and if an external customer the other given to the driver of the vehicle.

3.2.4 Non-Conforming Waste Procedure – Non Hazardous Waste

If waste is found to be non-conforming with the acceptance criteria or is not suitable for receipt, the following procedure is to be followed;

1. Notify the relevant EA officer(s) of significant loads as soon as is practicable;
2. If the carrier's vehicle is still present, the waste should, wherever possible, be reloaded back onto the carrier's vehicle;
3. If the material is reloaded onto the carrier's vehicle: the office of the carrier should be notified by telephone; the details including time of call and contact name are to be recorded in the Site Diary (or other recording system); and a copy of the Waste Rejection Record is to be retained;
4. If the carrier or customer has departed the site, and if it is considered safe to do so, the waste is to be photographed where possible, placed in the quarantine area pending the outcome of further investigations;
5. If the waste is of unknown composition, it is to be isolated at the operational area pending further investigations. This is to be achieved by the placement of cones or other barriers around the waste;
6. Further investigations may include contact with the carrier/customer and the producer to seek to determine the likely composition of the waste. These investigations are to be undertaken by the Site Manager or other designated person;
7. If the waste is confirmed as not being permitted for recovery at the site, the waste is to be directed to an alternative, suitably licensed facility; and
8. Wherever possible, rejected waste is to be removed from the site within 24 hours of receipt at the site; however, identification of suitable disposal facilities may result in the waste being stored for a longer period prior to removal from the site. This will be reported to the EA with timescales recorded and confirmation of removal.

3.2.5 Hazardous Waste Rejection Procedure

If waste is found to be hazardous or potentially hazardous upon receipt (for example contaminated with asbestos/oils), the following procedure is to be followed;

1. The carrier must tell the Environment Agency and contact the producer or holder for further instructions.

2. The producer or holder has 3 options.

- Move the rejected waste to a new consignee (suitably permitted facility).
- Move the rejected waste back to the original premises.
- Ask NBC to accept the waste that.

All of these require the producer to create consignment note.

However NBC will not accept hazardous waste. Arrangements will be made for the waste to be removed immediately unless there is a valid reason that it cannot be moved immediately. This will be discussed with the local EA officer to agree appropriate actions and recording.

The producer/carrier must arrange to remove the waste:

- **immediately, if NBC are not willing to store the waste temporarily.**

3.3.6 Waste Rejection Note

The Waste Rejection Record (Form 4) for non-hazardous rejected waste is to be completed and cross referenced in the Site Diary. It should include the following details:

- Date and time;
- Producer/Customer details;
- Carrier/Customer details;
- Transfer note reference number;
- Description of waste;
- Volume of waste;
- Photographs of the waste;
- European Waste Catalogue (EWC) code;
- Non-conforming waste; and
- Actions agreed and taken.

3.3.7 Quarantine Area

The site has dedicated waste quarantine area, which is uses to temporarily store waste being rejected, or non-conforming waste whilst it is being assessed.

Where there is a risk of fugitive emissions from non-hazardous quarantined waste awaiting removal or further investigation, the waste must be kept secure and monitored for emissions.

Quarantine storage is separate from all other storage and clearly marked as a quarantine area.

Any quarantined contaminated soils or stone should be sheeted or stored in a covered skip/container to prevent rainfall or wind from mobilising pollutants.

3.4 Incoming Waste, Tracking and Waste Storage

Storage areas are to be regularly inspected and maintained, including site surfacing and stockpile management.

All incoming and outgoing waste is tracked electronically.

A pre-booking system is in place to make sure that that the site has have enough waste storage and process capacity for the incoming acceptable waste.

The system management system and procedures provide and retain accurate information relating to

- pre-acceptance or waste
- acceptance records and supporting documentation
- non-conformance or rejection records
- storage checks and inspections
- treatment records and testing
- removal off site and recording

This information is accessible in the site office at all times.

Records are kept of deliveries, on-site treatment and despatches. The tracking system will also operate as a waste inventory and stock control system, including both wastes and end-of-waste materials produced at the site. It includes this information as a minimum:

- the date the waste arrived on site
- the original producer's details (or unique identifier)
- a unique reference number
- waste pre-acceptance and acceptance information
- the package type and size
- the intended treatment or disposal route
- the nature and quantity of wastes held on site
- where the waste is physically located on site
- where the waste is in the designated recovery or disposal process
- identifying the staff who have taken any decisions about accepting or rejecting waste streams and who have decided on recovery or disposal options
- details that link waste to relevant transfer notes
- details of any non-conformances and rejections, including consignment notes for waste rejected because it is hazardous.

Records evidence the total quantity of end-of-waste materials on site at any one time, and where that material is located based on the site plan.

All electronic systems are managed and maintained. Paper based archived records are kept at head office off site.

The site must keep acceptance records for a minimum of 2 years, generally all records are kept for the lifetime of the permit.

Daily inspections will ensure that:

- Wastes are stored and segregated in designated stockpiles and storage in line with the site plan.
- Wastes and product stockpiles will be clearly signed and identifiable.
- The maximum height of each stockpile on site, will not exceed the specified heights detailed in the DEMP.
- Waste will not be stored outside of the designated storage timescales within the storage plan.
- Site capacity will be managed on a daily basis.
- Waste will be stored in line with the site layout plan, the site layout plan designates all storage areas.

Should storage areas on site reach capacity, no further waste shall be accepted and waste diverted to a suitably permitted facility.

3.5 Waste Treatment

Wastes are subject to minimal manual treatment upon receipt to remove minor visible contaminates, then may be subject to washing, then mechanically treated, with the segregation and separation of waste into designated storage areas to recover aggregates as an end of waste product.

This process is fully detailed in the company WRAP Quality protocol.

Soil wastes may be washed then screened and sold. This material may meet the end of waste test or be received as a waste under the appropriate waste legislation.

3.5 Waste Outputs

Once waste treatment operations have been undertaken in a controlled manner, any residual waste materials are stored and bulked pending removal for further recovery.

Following manual or mechanical waste treatment, a small fraction of general waste may be generated. This waste will be sent for further recovery also to a suitable permitted site. Records of all output from the site are recorded.

Residual wastes may be:

- Wood
- Plastic
- Metal
- Packaging (light plastic or carboard)

3.6 Site Security

The site benefits from

- 2.4m palisade security fencing;
- 24 hour site security;
- CCTV cameras;
- Visitor sign in system; and
- Remote out of hours monitoring.

Access to the site is via one entrance/exit. The site does share the entrance and exit with one other company in the compound area.

Visitors to NBC must sign in and out via the visitors register located in the site office.

The site security system CCTV cameras cover all external and internal operational areas on site. CCTV cameras cover all operational waste storage areas.

During operating hours there is a member of senior management or staff on site at all times.

Security staff can assess on site activity to either identify any false alarms or carry out further investigation, notifying Senior Management.

3.7 Daily Site Inspections and Audits

The Site Manager/TCM or designated member of staff is to carry out a daily inspection the site, completing the Daily Site Inspection Sheet.

A walkaround of the site completing the required list of checks is carried out, answering yes or no as to whether the site is compliant or not. Any defects and remedial actions are also recorded when complete.

If there are any issues identified not in the scope of the inspection checklist, these comments will also be recorded in the site diary and addressed.

Quarterly health and safety and environmental audits are also carried out (Form 2 refers) covering other site activities and controls. The company have an external Health and Safety consultant and Environmental Consultant for additional compliance support.

3.8 Monitoring and Control

There are no listed point source emissions from the site therefore there are no conditions of the environmental permit that set specific emissions limits.

Should any such parameter be imposed in the future then this procedure would be reviewed and amended accordingly.

3.9 Traffic Management

All vehicles must adhere to the site speed limit.

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.

Drivers waiting to tip at the facility shall follow the instructions of site management and shall only tip in the designated area, unless advised otherwise.

No tipping shall take place over sorted stockpiles. Vehicles on site tipping or loading will be supervised by the Site Manager/or site operative.

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 or covered 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.

3.10 Noise Management and Minimisation

All waste management operations on-site shall be conducted so as to prevent or reduce noise nuisance off-site. Noise shall be limited to such levels that are unlikely to cause pollution of the environment or harm to health or serious detriment to the amenity of the locality outside the site boundary.

All site operations shall be conducted in such a manner that noise from such operations does not give rise to unacceptably high levels of noise.

The main sources of noise are as follows:

- Noise from vehicular movements (site access road and internal site movements);
- Crushing and screening activities;
- Dropping material from height and;
- Noise from operation of site plant including loading and unloading of materials.

It is considered that the generation of vibration as a result of operations at the site will not be significant.

The Site Manager and any staff employed at the site are trained in the need to minimise site noise and are responsible for monitoring and reporting excessive noise when carrying out their everyday roles.

3.10.1 Plant and Equipment

Where practicable, the selection and use of low-noise equipment or alternative working methods is to be adopted to minimise the generation of noise at source. Inspection and repairs are to be undertaken in accordance with the manufacturers' recommendations.

Noise control is to be implemented through one or more of the following procedures:

- Care is to be taken during the unloading and loading of materials. For example, minimise drop heights to prevent unnecessary noise creation.
- Daily checks are conducted with an auditory assessment made.
- Unloading and loading of wastes will be placed on the site surface not dropped from height.
- Site operations including treatment are restricted to hours specified in the planning consent.
- Timing of noisy works away from evenings and weekends.
- Follow site speed limits and ensure they are complied with by any vehicles using the site.
- Switch off plant and vehicles when not in use.

Plant is to be selected and operated to minimise noise. All site plant and machinery shall be operated and maintained in accordance with manufacturer's specifications. Site plant will be subject to a planned preventative maintenance schedule.

Auditory inspections shall be carried out in response to complaints.

A record of the inspection findings and any complaints are to be made in the Daily Inspection Sheet or Diary and on the Complaint Recording (Form 7).

3.10.2 Monitoring

If a noise problem is noticed or a complaint is received, it will be immediately dealt with by the Site Manager. The source of the problem will then be investigated, and appropriate corrective action will be taken.

In the event that noise derived from the site is detected beyond the site boundary by the Site Manager which in their opinion could give rise to complaints, investigation action shall be taken without delay. The nature of the investigation shall take into consideration weather conditions at the time and any operational issues together with the nature of the receptors. The following remedial action may be appropriate:

- Relocate plant and equipment to less sensitive locations;
- Minimising waste treatment operations;
- Undertake maintenance on equipment that will reduce noise levels;
- Modify plant to incorporate noise suppression equipment; and

Replace noisy plant and equipment with quieter models.

3.10.3 Complaint Records

A record relating to the management and monitoring of any noise complaints is to be maintained and documented in Form 7 (Complaints Record Form). The information required to complete the complaint form is as follows:

- Telephone number and location of caller (if provided);
- Date, time and duration of offending noise;
- Callers description of the noise and any other comments;
- Weather conditions;
- Wind strength and direction;
- Detail any other complaints about the noise;
- Potential noise sources that could give rise to the complaint;
- Operating conditions at the time of the noise issue;
- Any follow up taken with the caller; and if required
- Updates to this document.

3.11 Odour Management

The nature of the waste materials handled at the site means that odour is not likely to be an issue.

Notwithstanding this, a number of measures are to be employed to ensure that odorous wastes are not accepted at the site and, if accepted, are handled appropriately.

Odour control is to be implemented through the following procedures:

- Adhere to strict waste acceptance procedures to ensure only permitted wastes are accepted on-site;
- Keep the site clean and tidy by way of a regularised housekeeping regime;
- The Site Manager/Operatives are to monitor for odours throughout the working day;
- In the event that odours are detected, investigations are to be undertaken to determine the cause and appropriate remedial action taken;
- In the event that non-conforming wastes are delivered to site eg; contaminated material, they should be isolated and removed from site at the earliest opportunity. If identified on the vehicle the waste is to remain in the vehicle and be sent off site to a suitably permitted facility; and
- If identified following a delivery, the waste will be removed to a designated quarantine area pending removal off site to a suitably licensed facility.

3.11.1 Odour Survey

An odour survey or 'sniff test' is to be carried out by the TCM/Site Manager or designated person when on site. The findings and any comments will be recorded on the Daily Site Inspection Sheet.

3.12 Pest Management

The nature of the waste materials handled at the site means that pest infestations are not likely to be an issue. Notwithstanding this, operations at the site are to be undertaken such that infestation or colonisation by pests are prevented.

On a daily basis, the site will be inspected for pests by the Site Manager or designated person and recorded in the Daily Site Inspection Sheet. Should any pest activity be noted this is to be recorded and relevant actions and monitoring recorded.

All waste areas can be accessed and kept clean to prevent historic wastes providing a source for rodents/pests/flies.

Site operatives employed on site are to be vigilant and report any potential infestations to the Site Manager, who will ensure appropriate measures are taken.

The following procedures will be followed to control and monitor any insect and rodent infestations:

- Surfaces used for the storage of waste are to be kept clean;
- Staff welfare/office areas will be kept clean and free of waste and exposed foodstuff;
- The site is to be monitored on a daily basis for any visible signs of rodent or insect activity, such as runways, and the findings logged in the site check sheet;
- If any signs of potentially problematic numbers of pests or vermin are discovered at the site, the Site Manager or designated person is to contact a pest contractor as soon as possible; and
- Should the use of pesticides or other means of pest control be recommended, they must only be implemented by persons qualified/trained to carry out the necessary measures.

3.12.1 Management of pesticides

In the event pest control products are required to be stored on site, the Site Manager or designated person will;

- Buy only enough pesticide for 3-6 months.
- Store pesticides away from waste stockpiles and operational areas.
- Keep pesticides in their original containers with the labels intact.
- Store in a separately and secure structure, away from children and pets.
- Do not store pesticides in cabinets near food, medical supplies or cleaning products.
- Do not store pesticides near water supplies.
- Flammable pesticides should be stored away from sources of heat, flame, or spark.
- Store pesticides in a dry area to prevent the deterioration of containers.
- Inspect pesticide containers frequently for damage.

Any waste/out of date pesticides are to be disposed of as per the manufacturer’s instructions.

3.13 Litter Management

All waste management operations on-site are to be undertaken to minimise windblown litter outside the site boundary. Due to the nature of wastes accepted on site litter should not arise during acceptance, treatment or storage.

Wastes are stored externally in designated stockpiles or bays which provides containment of any potential windblown litter.

Weather conditions are monitored on a daily basis. During high winds care will be taken when unloading/loading wastes where the risk of windblown litter/debris is increased.

The site is to be operated to comply with the following principles:

- Adhere to strict waste acceptance procedures to ensure only permitted wastes are accepted on site;
- In the event of any nuisance from litter occurring, pick up the litter immediately;
- The Site Manager or designated person is to undertake a daily inspection and litter pick of the site and perimeter; and
- All vehicles entering and exiting site will be covered/sheeted to prevent the escape of litter/dust.

On-site inspections for litter shall be made daily and remedial actions noted in diary and recorded on the Daily Site Inspection Sheet.

3.14 Dust Management

Wastes handled on site may generate dust.

In order to prevent the generation of dust, the Site Manager/TCM or site operatives must follow the mitigation measures proposed below to minimise and avoid any fugitive dust emissions to the surrounding area.

- All wastes are to be stored within the designated areas;
- Adhere to the site's speed limit;
- Be vigilant in noticing if dust is being visually generated;
- Use suppression methods to reduce dust and wind wipping of waste and products;
- Management of stockpile heights;
- Cease site waste movement operations during periods of high winds to reduce the risk of dust leaving site;
- Where required, operational areas are to be kept tidy to reduce dust emissions;
- If areas are dusty dampen down using the site water supply/hose;
- Utilise the site road brush if required to clear areas external pavement/roadways that are visually showing dust deposits from daily site operations.

The site has a Dust and Emissions Management Plan to manage the risk and controls to prevent emissions from site activities.

Visual inspections are to be carried out by the Site Manager or designated person on a daily basis, and more frequently if required during dry and windy conditions. Weather conditions are monitored on a daily basis. During processing a checklist is also provided to record weather conditions, dust suppression if used and visual monitoring.

The Site Manager or designated person shall assess the need for remedial action and implement such action where necessary. A record of the inspection findings and remedial action taken will be made on the daily inspection sheet.

3.14.1 Dust Monitoring

If dust is being generated the Site Manager or designated person will walk around the site and adjacent roads to determine if and dust from the site is causing an impact.

During treatment activities the Site Manager/TCM monitoring the process recording any issues and taking remediation action to prevent fugitive emissions.

If dust from the site is causing an impact, the activities causing it will be ceased.

A note will be made in the site diary of action taken and a record made on the Daily Site Inspection Sheet.

3.15 Training Procedure

The below procedure covers the training requirements for any staff employed on site and to maintain continued competence on site.

The site is to be managed by sufficient numbers of staff competent to operate the site without causing pollution. Staff are to have clearly defined roles and responsibilities.

Training is to be provided when:

- A new employee/site operative begins work on-site;
- New equipment is introduced on-site, thereby changing the site's operating procedures;
- An audit identifies a particular training need; and
- New procedures are introduced, or procedures set out within the EMS or FPP are amended.

3.15.1 Site Operative Training

The Site Manager or TCM is responsible for ensuring that all site operatives receive the correct level of training and that all new site operatives receive an induction. All new site operatives are to be provided with clear instructions regarding their individual tasks and requirements.

In particular, emphasis is to be made in ensuring all site operatives are aware of the following aspects and environmental considerations:

- The aims and objectives of the Environmental Policy of the company;
- The conditions set out in the environmental permit, such as: permitted waste codes (EWC) and activities;
- Regulatory implications of the environmental 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 conditions set out in the environmental permit;
- Prevention of accidental emissions and action to be taken should accidental emissions occur; and
- Training on plant and site specific equipment;
- Training on the site EMS and WRAP Protocol;
- The roles and responsibilities of all site operatives to ensure that all aspects of this EMS are complied with.

Training is to be provided as required to ensure that site operatives are familiar with their responsibilities and the conditions of the environmental permit. Training will also ensure that site operatives will be fully aware of how to maintain optimal plant performance.

A training record is to be kept in the head office site for all site operatives. Staff responsibilities and training records are to be kept:

- recordings each employee's name and position within the company;
- the training required by each individual site operative;
- the date due and carried out;
- a date for a refresher of the training; and
- any further comments.

The training requirements of existing and new site operatives are to be reviewed annually. Training is a continual process which ensures that site operatives are familiar with their responsibilities and the

condition of the environment permit. Training will also ensure that site operatives will be fully aware of how to maintain optimal plant performance.

Regular toolbox training is also carried out, recorded and signed by staff.

All site operatives are to be aware of basic Health and Safety basic requirements, and also any specific Health and Safety related elements with respect to their role on site.

Any contractors enrolled on site will receive a suitable induction for Health and Safety and environmental risks.

Form 9 (Training Matrix) is kept electronically for any staff employed on site will be kept up-to-date and stored on the computer system. Copies of any training certificates will be kept together with the Training Record.

3.15.2 Technically Competent Manager

All operations at the site are to be under the control of a technically competent person as directed by the permit.

Copies of certification and qualification dates will be displayed in the site office. Every two years a continuing competency assessment is required to refresh and requalify the qualified person.

3.16 Accident Procedure

The company recognises the importance of the prevention of accidents that may have environmental consequences and that it is crucial to limit those consequences. The company has developed a system to identify, assess and minimise the environmental risks and hazards of accidents and their consequences.

This accident management plan is to be implemented and maintained at the site to ensure the site and any site operatives are fully prepared for such incidents. The accident management plan is to 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.

This accident management plan describes the techniques to be implemented to minimise the risks posed to the environment. Activities affecting the health and safety (H&S) of any operatives, contractors and visitors are separately managed in compliance with H&S regulation.

3.16.1 Hazard Identification

The following hazards have been identified:

- fire and explosion;
- loss of containment – spillage and leakage;
- unauthorised waste receipt and processing;
- security and vandalism; and
- flooding.

Risk assessments in relation to the identified hazards are included below.

3.16.2 Risk Estimation

The Accident Management Plan has adopted a risk assessment approach to each potential hazard by combining the probability and magnitude of the potential risk to give an estimation of the risk prior to any mitigation measures. The risk management measures, which are designed to reduce the likelihood of occurrence, are then detailed followed by an estimation of the actual risk post-mitigation (Residual Risk Rating).

3.16.3 Control Techniques

The Site Manager or designated person ensures that:

- All incidents, near misses, abnormal events, changes to procedures and significant findings of maintenance inspections are logged and recorded in the Form 5 (Accident and Incident Record).
- Any site operatives employed have training requirements identified and the relevant training provided.

Table 2.2: Accident Management Plan					
Accident Scenario	Probability ofAccident Occurring	Magnitude of PotentialImpact	Risk Rating before mitigation	Risk Management	Residual RiskRating (following Mitigation)
1 - Spills and Leaks / Loss of containment	Medium	Moderate to Severe Spillage and leakage could occur during vehicle or plant breakdowns / accidents Loss of containment could result in potentially polluting materials (including oils and chemicals) being discharged into surface water drainage systems and to controlled waters	Moderate	• The site is entirely surfaced in impermeable concrete hard standing and therefore considered to have a low potential for impacts to groundwater. • Fuel storage onsite is limited to a single 5,000 litre self-bunded tank stored externally upon impermeable concrete hard standing outside of the permitted area. • Potential spillages are from vehicles / plant during operation, breakdown or refueling. • Minor spills to be cleaned up immediately, using spill kits. Resultant materials to be placed in container for off-site disposal to appropriate facility, if necessary. • Immediate action to be taken in event of major spill which is likely to cause polluting emissions to the environment to prevent liquid from entering surface water drains or any adjacent unsurfaced ground. Spillage to be cleared immediately and placed in containers for offsite disposal. EA to be informed.	Low
2 - Vandalism	Low	Moderate The site could be subject to intentional vandalism and damage by intruders/ trespassers who could cause	Low	• On-site security measures. • Security CCTV cameras are installed at key areas of the site. • The site is securely fenced and gated. • All visitors to the site are required to register in the visitor's book and sign out again on exit, thereby minimising the risk of unauthorised visitors on the site. • Operational procedures have been implemented including regular	Low

		damage or harm to the plant and equipment or cause fires.		inspections, ensuring continual monitoring of security provision atthe site.	
3 - Flooding	Negligible The site not in an area at low risk from flooding from rivers or sea	Negligible	Near Zero	• In the highly unlikely event of flooding,	Low
4 – Fire; Plant malfunction; Electrical equipment that could provide an ignition source; Waste present that may support combustion.	Medium	Severe	Medium	• All plant is subject to a planned preventative maintenance schedule - TBC • All plant has been specified to be intrinsically safe and earthed inaccordance to best practice. • All aspects of the plant are constructed of noncombustible materials. • The processing plant has been designed to shut down (fail safe) inthe event of an emergency. • All waste stockpiles are segregated and there is good access if • In the event of a fire, a plentiful supply of water is provided on sitefrom water storage lagoons in and emergency. • In the event of a fire, the following actions will be taken: – The fire brigade will be notified immediately and the EA as soonas practicable. – All containment valves and systems will be closed. – The site will be immediately evacuated.	Low

				• Machinery is regularly cleaned to remove any dust, etc. • Records of fire incidences will be kept on site together with a summary of remedial action taken. • EA will be advised of all incidents of fire as soon as is practicable. • Smoking will not be permitted in the operations areas of the site.	
5 – Failure of Mains Services: Failure in the mains serviceselectricity and water.	Medium	Low	Low	All plant has been designed to fail safe in the event of a failure in the mains electricity supplying the site. In the event that mains services are unavailable, the following actions will occur: • In the event of sudden disconnection the processing equipment willcease to operate. • If there is sufficient storage space waste deliveries would still be accepted, however if storage capacity is exceeded this will require the ceasing of waste deliveries to the site until such time as plant is up and running and able to clear the backlog of waste, so as to prevent large volumes of waste accumulating on site.	Negligible
5 – Non-conforming Waste: Some of the waste inputs at the site could contain impurities that impede / prevent the processing process	Low	Moderate / Severe	Low	The following methods will be implemented to ensure that non-conforming wastes do not compromise the safe operation of the plant or cause unwanted emissions: • All wastes accepted onto site have been subject to 'pre-acceptance' in accordance with the acceptance procedures. • All incoming wastes are inspected in accordance with established procedure. • Any non conforming waste will be removed once the initial recording and investigation is complete. • Records of incidents involving incompatible wastes will be kept on site together with a summary of the remedial action taken.	Low
6. Operator Error / Failure ofEquipment: The unexpected breakdownof any part of the plant could	Medium	Low	Low	• The site is equipped with spare plant and equipment which can be used in the event of a single plant breakdown (e.g. loaders etc). • All equipment is subject to a Planned and Preventative Maintenance Programme (PPM), to minimise unplanned failures– more to follow (critical plant)	Negligible

of wastes. The result of operator error could result in the acceptance of non-conforming (malodourous or dusty) waste streams.				plant will be slowed to ensure no backlog of waste builds up on site. Should there be total power outage, all waste deliveries to the plant will cease. Processing activities carried out within the site are relatively simple. The plant includes an automatic alarm system to alert the operator of potential operational problems and where relevant will be triggered with sufficient safety margin to permit operator intervention to prevent an actual problem occurring. All operational staff will be fully trained against the site operating procedures. Training will include awareness raising of key plant parameters and the potential implications of failure to control operations as designed and the associated potential impact on the environment. Should incompatible wastes be unintentionally accepted at site, these will be temporarily stored in the external quarantine area and removed from site as soon as possible. All incidents will be recorded and investigated appropriately according to the site incident procedure.	

3.17 Spillage Procedure

The site is assessed for risk and control measures implemented to prevent/minimise the risk of a spillage.

Any fuel 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/container for disposal to a suitably permitted facility.

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

3.17.1 On-site control procedures

To prevent spills or escape of oils/fluids on site the below control measures are put in place;

- Fuels and oils on site are stored in a designated area away from the permitted area;
- Spill containment kits on site;
- Plant and vehicles are refiled on the concrete parking area;
- Fuels and oils are stored away from moving vehicles and plant to prevent damage to containers/storage areas and to reduce the risk of contamination of waste and product onsite.

3.17.2 Major Spillage

In the event of a major spillage on site the Site Manager or designated person is to be contacted immediately and informed of the situation.

The spillage must be cordoned off. Site personnel must ensure that no persons or vehicles re-enter the affected area.

Should a major spillage occur, a check shall be conducted to ensure that all persons present on-site are safe and accounted for.

Any spillage of hazardous materials at the site shall be treated as an emergency and action taken as soon as practicable to absorb or contain it using the spill kit on site.

If the spillage cannot be controlled on-site then a specialist contractor is to be contacted by telephone immediately.

The Operator/Site Manager is to contact the Environment Agency by telephone, and in writing, as soon as reasonably practicable, after a major spillage of hazardous materials to advise them of the incident and of the action taken.

A record in the site diary and incident report must be filled in to record any spills and action taken.

3.17.3 Minor Spillage

Action taken as soon as practicable to absorb or contain it using the spill kit on site.

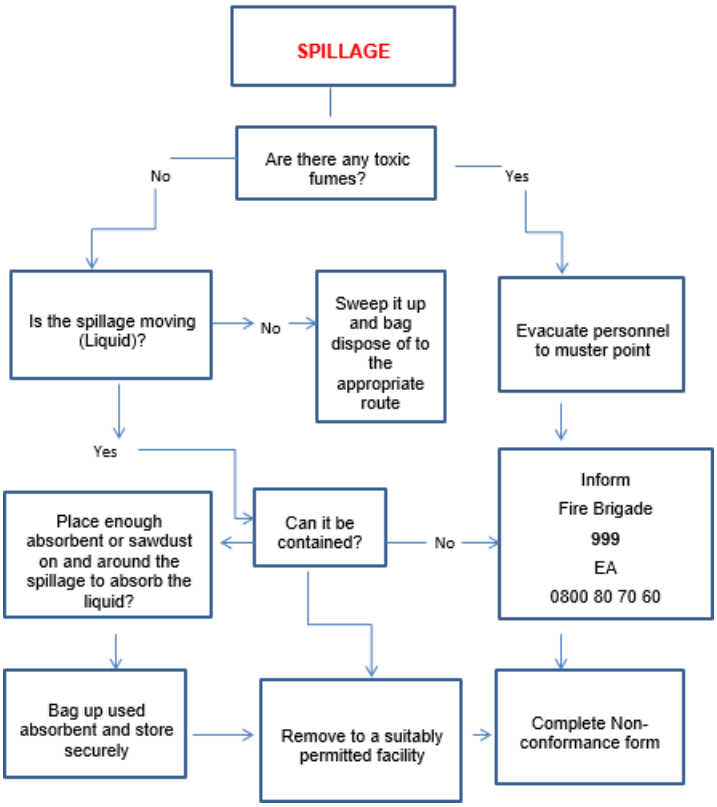
A record in the site diary must be filled in to record any spills including remedial action taken.

Spill kits will be clearly visible on-site for all personnel and contractors to see with adequate signage to instruct anyone on-site of the location of these.

Full training is to be provided to all relevant staff on the correct use of the Spill Kits.

Spill kits are checked on a weekly basis to ensure there is sufficient supplies and equipment available.

Figure 1 - Site staff actions in the event of a Spillage



3.18 Fire Prevention

The site has a fire risk assessment and controls such as fire extinguishers, notices and water supply in place for an electrical or plant fire.

3.19 Maintenance Procedure

All maintenance audits and monitoring for plant and equipment will be carried out in accordance with the manufacturer's specifications, which can be found in the site office.

This procedure includes a proactive approach to maintenance programs. The site manages plant and equipment servicing and MOT records using a site maintenance planner.

Defect sheets are completed for all plant/machinery and repairs carried out by staff or by a suitably qualified mechanic. Defect sheets are checked by the Site Manager or designated site staff.

Maintenance of all equipment is overseen by the Site Manager, with the following information compiled;

- the item that will require maintenance;
- how often maintenance will need to be carried out;
- a record of any particular maintenance instructions; and
- who on site will be responsible for each maintenance check.

This will ensure that if any site operatives employed are aware of their particular responsibilities for maintenance checking and ensure that any site operatives are aware of any amendments and additional maintenance required.

When a maintenance issue is dealt with, the site diary will be completed for equipment or infrastructure repaired.

This record will include the following information;

- the item/plant/vehicle maintained;
- the frequency any further required maintenance for instance; daily, weekly or monthly;
- completed date and who carried out by; and
- any particular comments.

The records including any certificates and invoices will be kept in the site office to ensure records are available for reference or inspection.

3.20 Complaints Procedure

Any complaints received from the local public will be recorded on (Form 6) Complaints Record Form.

The complaint will also be recorded in the Site Diary (or other recording system).

Site Management will follow the steps set out below if a complaint is received at the site:

1. Details of the complainant (including; name, address and a telephone number) if provided.
2. Make a record of the date and time the complaint was made.
3. What happened, what was the complaint actually about?
4. Was anyone else on site or other stakeholders aware of the issue and if so, who?
5. Once confirmation is made that the complaint issue relates to the site, investigate the source of the problem.
6. Record how the site has implemented methods to ensure the issue will not cause complaint in the future.
7. Make a record of any signs of pollution. If the complaint (such as emissions to groundwater or a local watercourse) is significant, the Environment Agency will need to be contacted on 0800 807060 as soon as possible. The severity of the incident will be determined by the Site Management.
8. For significant complaints email/verbal notification will be sent to the local Environment Agency office
9. All Complaint Record forms must be signed and dated.

Any actions taken in response to the complaint will be recorded on the Complaints Record form and the site diary.

The Environment Agency will be notified of any complaints received and the actions taken in response to the complaint. The complaints received will be reviewed during site audits to ensure the source of the complaint will be avoided in the future.

3.21 Contingency Planning

3.21.1 Breakdowns

Minor breakdowns can be managed with repairs will being carried out within 48 hours. All sites retain parts for some critical onsite equipment, in preparation for the maintenance and repair of onsite plant.

If repairs within this timescale are not possible, plant and equipment will be sourced from within the business or hired until such time as repairs have been completed.

If any vehicle, plant or equipment breakdown leads to an interruption to waste handling or processing, discussions will take place between senior management, to discuss and plan to divert waste elsewhere until such time as the site can resume normal operations.

In the event there is a significant breakdown which will impact site operations, the EA will be notified. Discussions between the site and the EA in respect to timescales in relation to the recommencing of site operations.

In the case of total plant failure resulting in a prolonged delay in site operations, the contingency plan would be to cease all waste acceptance and utilise company fleet to remove waste from the site to third-party waste management companies until the situation was resolved.

3.21.2 Enforced Shutdowns

In the event the site is shut down for example due to flooding or major staffing issues, all deliveries to site will be ceased. Site security, emergency and fire prevention measures will be maintained. Senior site management will contact EA regarding actions and timescales in relation to the recommencing of site operations.

3.21.3 Fire

In the event of fire or any other major incident on site the contingency plan will be implemented. This means that all operations i.e. waste acceptance and treatment will be ceased until the Environment Agency or Fire Service advises Senior Management that it is safe to carry out the activities.

3.21.4 Storage Capacity

If during the daily site inspections, Site Management identify that waste storage areas are nearing/or at storage capacity, discussions will be made with senior management. Consideration will be made whether to:

- temporary cease waste acceptance until stockpiles are manageable;
- arrange for processed material to be moved off site utilising additional transport;
- divert wastes to other suitably permitted waste management facilities.

In the event of any delay to the removal of processed material from the site, senior management will contact the relevant ‘waste receiver’ in order to determine the anticipated length of the delay.

If deliveries to the site are scheduled, before the delay to waste removal is resolved, that would result in an exceedance of the storage capacity, Site management will contact the EA immediately and incoming deliveries will be ceased.

In addition, in the event of a contract failure with, or closure of, a waste receiver (and its operations) that could result in the storage of material on-site for a long period, Senior Management will contact the EA immediately.

3.22 Record Keeping

The company will keep the below records along with all waste duty of care records within the site office or Head Office (Morpeth).

- Permits/exemptions issued to the site;
- other legal requirements;
- risk assessments;
- copies of the management system and associated plans;
- health and safety records;
- all operating procedures;
- staff competence and training records;
- emissions and any other monitoring undertaken if required;
- compliance checks, findings of investigation and actions taken;
- complaints made, findings of investigation and actions taken;
- audits of management system, findings (reports) and actions taken;
- management reviews and changes made to the management system;
- waste returns.

A copy of the site condition report is also maintained and kept to record the condition of the permitted area.

Keep this up to date through the life of the permit and will include the following information:

- records of any contamination and what was done in response to those incidents;
- records of any site audits, infrastructure or site improvements taken to protect land and since operation.

This is to show that the Operator has taken the necessary measures to avoid any pollution risk from site activities. Should the Operator wish to surrender the permit they can use the associated records to demonstrate they have returned the site to a satisfactory state and that the condition of land and groundwater has not deteriorated as a result of site activities.

3.23 Closure

This procedure outlines the preparation of the closure of the site at the end of its lifetime. The purpose of this procedure is to ensure that any site operative working on site is aware of the procedures in place to ensure when the site is closed the environment is protected.

The Operator and TCM is responsible for ensuring the delivery of all procedures described in the Environmental Management System.

Any changes required are the responsibility of the Operator/Site Manager or other designated person to update and re-issue the amended procedure.

In the event the decision has been made by Operator to surrender the permit, the need to show the necessary measures to avoid any pollution risks resulting from site activities must be provided along with the site has being returned to a satisfactory state.

Keeping the site condition up to date during the life of the permit will help demonstrate this. When applying to surrender a site condition report must be submitted.

Records relating to site inspection, repairs, spillages or non-compliances shall be kept in preparation for this purpose.

4.0 Recording and Reporting Forms

The below forms will be used to carry out daily checks, routine maintenance, training and reporting.

Form 1	Daily Site Inspection Sheet
Form 2	Quarterly E, H&S Checklist
Form 3	Non-conformance Report
Form 4	Waste Rejection Record
Form 5	Accident and Incident Record
Form 6	Complaints Record Form
Form 7	Permit to Work
Form 8	Plant Inspection Sheet (example)
Form 9	Training Matrix (example)
Form 10	Induction checklist

N.B.CLARK MORPETH	**Daily Site Monitoring**	**Form 1** Effective: Dec 2022

SITE: ..... WEEK COMMENCING:.....

ITEM		SUN	MON	TUE	WED	THUR	FRI	SAT
1.	Staffing levels (agency staff req?)							
2.	Security/CCTV/Fencing (damage/faults)							
3.	Signage/Safety Markings **(Weekly)**							
4.	Site surfacing (cracks/defects/ standing water, drains)							
5.	Storage Areas (capacity/containment issues)							
6.	Stockpile management (Containers and separation distance compliant)							
7.	Housekeeping / Tidiness of Site							
8.	Plant and Equipment (Breakdowns/Equipment Repairs)							
9.	Dust							
10.	Odour							
11.	Noise							
12.	Insects/Vermin/Flies							
13.	Litter							
14.	Site records updated (non conformance's, site diary etc)							
15.	Integrity of any containers/skips containing wastes							
16.	Condition of fuel & storage bunds/tanks							
17.	Spill Kit (stock/equipment required?) **(Weekly)**							
18.	PPE (stock levels in welfare area/first aid/replacements) **(Weekly)**							
19.	Records Updated (eg, Site Diary, Non-Conformances)							
20.	TCM Attendance							

N.B.CLARK MORPETH	Daily Site Monitoring	Form 1
		Effective: Dec 2022

COMMENTS BELOW (*Please insert number)*

No	DAY	COMMENT	ACTION TAKEN/REPAIR	DATE COMPLETED

INSPECTED BY: ..... **DATE:** .....

Notes:

1. **Tick box to indicate check conducted and all in order.**
2. **Insert N/A if not applicable or not inspected.**
3. **Cross in box to indicate check conducted and action needed. Note number and action taken or needed in Comments box with remedial/actions taken and date of completion.**

N.B.CLARK MORPETH	**Environmental, H&S Audit Checklist**	**Form 2** Effective: Dec 2022

Date of Audit:	**Auditor:**	**Supervisor or Manager:**

	Check Item	**Findings**	**Comments**
1	**Housekeeping** • General site tidiness and well organised? • Walkways free of obstacles and trip/slip hazards? • All exits free of obstacles inside and outside? • All equipment stored correctly under correct conditions?		
2	**PPE** • PPE is available and worn on site? • PPE is maintained (check storage area/ppe checklist)? • PPE stock levels (adequate)? • Eye wash in place/in date?		
3	**SOPs and Safe Systems of Work** • All employees observed following Safe Operating Practises and site procedures • All Visitors in designated areas and induction forms complete		
4	**Check Risk Assessments are being complied with (select one or two)** • Access to Site • Load Security • Fire • Security • Spillage		
5	**Plant and Equipment (offices and operational buildings)** • Are guards in place on moving mechanical devices? • Safety notices in place?		

	• Vehicle maintenance planner/testing up to date? • Is all portable equipment tested and labelled? • Trailing leads/overloaded sockets?		
6	**Fire** • Have any Fire Drills been carried out? • Fire doors clear and accessible? • Hoses checked? • Check fire extinguishers are in place,in date and the correct type • Alarms and smoke detectors checked and working?		
8	**Site Signage Information and H&S** • Routes, signs and doors clearly marked; signs easy to see; with outside entrances and parking? • Pedestrian walkways in good condition and clearly marked?		
9	**Security** • Emergency numbers for internal and external contacts are easily available? • Perimeter fencing check • CCTV working? • Visitor/contractor rules are in place? • Safety measures are in place for anyone working alone?		
10	**Site Surfacing and Spills** • Evidence of spills in the yard and equipment storage areas? • Ensure spill containment material is replenished if used. (Absorbents, Booms, shovels, bags, etc) • Spill procedure in place?		
11	**Site Drainage** • Are storage areas free of pooling water • Check no contamination to site surface		

11	**Staff Welfare** • Washrooms are clean • Washing facility available (soap, warm water) • First aid kits (supply inventory; treatment log; first aid training manual) • Are No Smoking Signs displayed		
12	**Hazardous Substances** • Hazardous substances are properly labelled, stored and disposed of (observe)? • A safety data sheets for each product is available and accessible? • Safe storage of hazardous substances/products?		
13	**Management System and FPP** • Have any site procedures changed? • Does the EMS/WRAP require review or updating? • Have any company changes taken place (registered office/TCM)?		
	Other Comments/Observations		
Signed:			
Role:			
Date:			

N.B.CLARK MORPETH	**Non – Conformance Report**	**Form 3** Version: 1 Effective: Dec 2022

NC No:

Reference Number (ie WTN/ Procedure):					
Part 1	Type of Non-Conformance – select one only				
Quality Non-Conformance			Environmental Non-Conformance		
Quality Near Miss			Environmental Near Miss		
Part 2	Assessment				
	Ref No.		Description	Proposed corrective action	
Date		Name			
Part 3	Corrective/Preventive Action				
Date		Name			
Part 4	Report closed				
Date		Name			

N.B.CLARK MORPETH	**Waste Rejection Record**	**Form 4** Effective: Dec 2022

Date:		Time:
Ticket No:		Waste Transfer Note No:
Waste Producer/Customer:		Origin of Waste:
Customer:		
Waste Carrier:		
Description of the Waste:		
Quantity of Waste:		
Reason for Rejection:		
Photographs taken?	YES NO	
Action Taken/Disposal Information:		

N.B.CLARK MORPETH	**Accident and Incident Record**	**Form 5** Effective: Dec 2022

Date and time of the incident	
What happened, what was it about?	
Was anyone else aware of this – other witnesses? If so who?	
What caused it?	
What action did you take to fix the problem? Were external agencies involved?	
What have you done to make sure that it does not happen again?	
Was there any significant pollution – for example: oil entering a surface water drain. If so what?	
If there was then you must notify the Environment Agency on 0800 807060 ASAP. Have you done so?	Time: Date: E.A Incident number:
Please print your name and sign	

N.B.CLARK MORPETH	**Complaints Record**	**Form 6** Effective: Dec 2022

Complainant Details Name:	
Address: (State if anonymous)	
Phone No:	
Date and time of complaint:	
What happened, what was it about?	
Was anyone else aware of this – other neighbours or staff? If so who?	
If the complaint relates to your site, what was the problem, what went wrong? If you can't find the source of the problem you should record what the problem was.	
What have you done to make sure that it does not happen again?	
Was there any significant pollution – for example: fire / excessive dust / major spillage? **If so the Environment Agency must be informed.**	
If there was then you must notify the Environment Agency on 0800 807060 as soon as possible.	Yes/No/not applicable At what time did you phone?
You must also write or send an email to confirm this to the local EA office. Have you done so?	Yes/No/not applicable Time: Date: EA incident number:

N.B.CLARK MORPETH	**Permit to Work**	**Form 7** Effective: Dec 2022

PART A: WORK REQUEST	**PERMIT NO:**
Location of work (building/yard):	
Date and Time of work:	
Contact name and phone number:	
Summary of work to be done:	
PART B: SAFETY PROCEDURES: **To be implemented prior to commencement of work.**	
The following activities and processes are to be suspended during the course of the work:	
The following equipment is to be withdrawn from service during the course of the work:	
Have all users have been made aware of the above:	YES:
	NO:
Safety warning notices have been posted where required?	YES:
	NO:
The following steps have been taken to eliminate, control or contain hazards in the area and the following safety measures are recommended:	
PPE required:	
APPROVAL: I confirm that I have inspected the work area detailed above and declare that to the best of my knowledge and belief the work can be carried out safely and without serious risk of injury to health.	Name:
	Date:
	Time:

N.B.CLARK MORPETH	**Permit to Work**	**Form 7** Effective: Dec 2022

PART C: CONTROL OF RISKS ARISING FROM THE WORK	
Isolation of services: (please tick as appropriate)	Water:
	Gas:
	Electric:
	Other:
Lock-off required?	
Safety signs posted?	
Air monitoring required?	
Are there other hazards associated with the work?	
DECLARATION: I understand the precautions to be taken under this permit.	Company:
	Name:
	Signed:
	Date:
	Time:
Permit validity period:	To: From:
PART D: COMPLETION OF WORK	
I confirm that the work has been completed in accordance with this permit. Services have been restored and the work area is ready for re-occupation.	Name:
	Date:
	Time:
PART E: REINSTATEMENT OF WORK AREA	
I confirm that all equipment has been returned to service, any remediation carried out and waste returned, safety signs have been removed and the users informed that work may resume in this area.	Name:
	Date:
	Time:

N.B.CLARK MORPETH	**Plant Inspection Form**	**Form 8** Effective: Dec 2022

EXAMPLE: WEEKLY PLANT / EQUIPMENT INSPECTION RECORD – MOBILE PLANT - EXAMPLE

WEEKENDING ……..
START HRS ……..
FINISH HRS ……..

SITE	
MACHINE	
SERIAL NO	

√ SATISFACTORY
X REQUIRES ATTENTION

ITEM NO:	**DAILY CHECKS**	**SUN**	**MON**	**TUE**	**WED**	**THUR**	**FRI**	**SAT**
1	ENGINE OIL							
2	HYDRAULIC OIL							
3	TRANSMISSION OIL / GEAR OIL							
4	COOLANT							
5	GREASED							
6	FLASHING LIGHTS							
7	REVERSING CAMERA & BLEEPER							
8	HEATER & AC							
9	WINDOWS & MIRRORS							
10	BRAKES & HANDBRAKE							
11	SEAT & SEATBELT							
12	STEPS & HANDRAILS							
13	FIRE EXTINGUISHER							
14	G.E.T (CUTTING EDGE)							
15	LIGHTS							
16	TRACKS / TYRES / TIGHTEN ETC							
17	INSPECTION FOR LEAKS							
18	FILTERS CLEANED							
19	WASHED							
20	LITRES OF FUEL							
	OPERATORS INITALS							

IF AN "X" IS PLACED IN ANY OF THE BOXES YOU MUST INFORM THE MANAGER ASAP.
ANY DAMAGE TO ANY PLANT MUST BE REPORTED IMMEDIATELY TO THE MANAGER.

ITEM NO:	**DEFECT DETAIL**	**ACTION TAKEN**	**HRS**

SERVICE DATE:	**CONTRACTOR:**	**HRS:**

THIS PLANT INSPECTION RECORD MUST BE GIVEN TO YOUR MANAGER AT THE END OF THE WORKING WEEK TO BE SIGNED OFF.
COMMENTS:

MANAGERS SIGNATURE……

N.B.CLARK MORPETH	**Training Matrix – Example**	**Form 9** Effective: Dec 2022

Work supervised only = I Work unsupervised = L Train others = U Certificate = C
Date:

	Site Knowledge						**Health & Safety**					**Machinery Equipment**								
Employee Name:	Induction	Site Licence	Wamitab (COTC)	Environmental Impact/EMS			First Aid	Fire Prevention	Manual Handling	Risk Assessments		Loading Shovel	JCB 530							

N.B.CLARK MORPETH	**Employee Site Induction**	**Form 10** Effective: Dec 2022

Health and Safety Checklist

To be completed during initial induction.

- ❑ Explain the company's health and safety policy, pointing out any particular aspects that apply to employee.
- ❑ Emphasise employee's personal responsibility.
- ❑ Issue and explain any relevant safety information.
- ❑ Introduce responsible safety people / first aiders.
- ❑ Safe working systems – describe particular hazards associated with the working area and the work to be done. Explain the importance of following safe working practices at all times.
- ❑ Prohibited areas. Describe areas, which employees may not visit and give the reasons why.
- ❑ Machinery – clearly identify plant or machinery that employees must not operate, stressing the need for training and supervision before use, explain fault reporting and repair procedures.
- ❑ Explain the necessity for good housekeeping and tidy work areas.
- ❑ Dangerous substances – explain the need to read labels on containers and comply with instructions.
- ❑ Risk assessments – explain the importance of the control measures and who is responsible for maintaining them.
- ❑ Protective clothing – what is provided, when and why it must be worn.
- ❑ Safety equipment – when and why it must be used and who is responsible for maintenance.
- ❑ Hygiene – where washing and toilet facilities are to be found.
- ❑ The organisations smoking policy.
- ❑ First aid facilities.
- ❑ Accident procedures. Stress that all accidents, injuries and near misses must be reported and show where the accident book is kept.
- ❑ Emergency procedures – what to do in the event of a fire or evacuation.

I have received and understood the above training and information.

Signed: …… (Employee) **Date: …….**

Signed: …… (Line Manager)

N.B.CLARK MORPETH	**Employee Site Induction**	**Form 10** Effective: Dec 2022

Environmental Management Training Checklist

To be completed during initial induction.

- ❑ Emphasise the employee's personal responsibility.
- ❑ Explain any relevant environmental literature including Environmental Management System (EMS) , Permit Conditions and Planning Conditions relevant to the employee's work. Explain where these documents are held.
- ❑ Explain the site WRAP Protocol and associated plans.
- ❑ Explain any quality documents relevant to the employee's work such as British Standards, company checklists and other forms.
- ❑ Explain the role of the Environment Agency and compliance inspections.
- ❑ Explain the necessity for good housekeeping and tidy work areas.
- ❑ Dangerous substances - explain the need to read labels on containers and comply with instructions. Consider the environmental impacts of using the substance.
- ❑ Environmental Risk assessments - explain the importance of the control measures and who is responsible for maintaining them.
- ❑ Emergency procedures including spillages. Explain the relevant procedures for the site, the location of pollution control equipment (absorbent granules, booms, shovels, etc). Stress that all incidents must be reported.
- ❑ Explain the importance and benefit of recording all complaints regarding environmental and quality issues. Explain the procedure for dealing with enquiries and complaints.
- ❑ Explain the site training requirements and for the use of plant and machinery.

I have received and understood the above training and information.

Signed: …… (Employee) **Date: ……**

Signed: …… (Line Manager)

Table 2.2: Accident Management Plan					
Accident Scenario	Probability ofAccident Occurring	Magnitude of PotentialImpact	Risk Rating before mitigation	Risk Management	Residual RiskRating (following Mitigation)
1 - Spills and Leaks / Loss of containment	Medium	Moderate to Severe Spillage and leakage could occur during vehicle or plant breakdowns / accidents Loss of containment could result in potentially polluting materials (including oils and chemicals) being discharged into surface water drainage systems and to controlled waters	Moderate	• The site is entirely surfaced in impermeable concrete hard standing and therefore considered to have a low potential for impacts to groundwater. • Fuel storage onsite is limited to a single 5,000 litre self-bunded tank stored externally upon impermeable concrete hard standing outside of the permitted area. • Potential spillages are from vehicles / plant during operation, breakdown or refueling. • Minor spills to be cleaned up immediately, using spill kits. Resultant materials to be placed in container for off-site disposal to appropriate facility, if necessary. • Immediate action to be taken in event of major spill which is likely to cause polluting emissions to the environment to prevent liquid from entering surface water drains or any adjacent unsurfaced ground. Spillage to be cleared immediately and placed in containers for offsite disposal. EA to be informed.	Low
2 - Vandalism	Low	Moderate The site could be subject to intentional vandalism and damage by intruders/ trespassers who could cause	Low	• On-site security measures. • Security CCTV cameras are installed at key areas of the site. • The site is securely fenced and gated. • All visitors to the site are required to register in the visitor's book and sign out again on exit, thereby minimising the risk of unauthorised visitors on the site. • Operational procedures have been implemented including regular	Low

		damage or harm to the plant and equipment or cause fires.		inspections, ensuring continual monitoring of security provision atthe site.	
3 - Flooding	Negligible The site not in an area at low risk from flooding from rivers or sea	Negligible	Near Zero	• In the highly unlikely event of flooding,	Low
4 – Fire; Plant malfunction; Electrical equipment that could provide an ignition source; Waste present that may support combustion.	Medium	Severe	Medium	• All plant is subject to a planned preventative maintenance schedule - TBC • All plant has been specified to be intrinsically safe and earthed inaccordance to best practice. • All aspects of the plant are constructed of noncombustible materials. • The processing plant has been designed to shut down (fail safe) inthe event of an emergency. • All waste stockpiles are segregated and there is good access if • In the event of a fire, a plentiful supply of water is provided on sitefrom water storage lagoons in and emergency. • In the event of a fire, the following actions will be taken: – The fire brigade will be notified immediately and the EA as soonas practicable. – All containment valves and systems will be closed. – The site will be immediately evacuated.	Low

				• Machinery is regularly cleaned to remove any dust, etc. • Records of fire incidences will be kept on site together with a summary of remedial action taken. • EA will be advised of all incidents of fire as soon as is practicable. • Smoking will not be permitted in the operations areas of the site.	
5 – Failure of Mains Services: Failure in the mains serviceselectricity and water.	Medium	Low	Low	All plant has been designed to fail safe in the event of a failure in the mains electricity supplying the site. In the event that mains services are unavailable, the following actions will occur: • In the event of sudden disconnection the processing equipment willcease to operate. • If there is sufficient storage space waste deliveries would still be accepted, however if storage capacity is exceeded this will require the ceasing of waste deliveries to the site until such time as plant is up and running and able to clear the backlog of waste, so as to prevent large volumes of waste accumulating on site.	Negligible
5 – Non-conforming Waste: Some of the waste inputs at the site could contain impurities that impede / prevent the processing process	Low	Moderate / Severe	Low	The following methods will be implemented to ensure that non-conforming wastes do not compromise the safe operation of the plant or cause unwanted emissions: • All wastes accepted onto site have been subject to 'pre-acceptance' in accordance with the acceptance procedures. • All incoming wastes are inspected in accordance with established procedure. • Any non conforming waste will be removed once the initial recording and investigation is complete. • Records of incidents involving incompatible wastes will be kept on site together with a summary of the remedial action taken.	Low
6. Operator Error / Failure ofEquipment: The unexpected breakdownof any part of the plant could	Medium	Low	Low	• The site is equipped with spare plant and equipment which can be used in the event of a single plant breakdown (e.g. loaders etc). • All equipment is subject to a Planned and Preventative Maintenance Programme (PPM), to minimise unplanned failures– more to follow (critical plant)	Negligible

result in short term build up				• Should a single processing line breakdown, waste deliveries to the	

of wastes. The result of operator error could result in the acceptance of non-conforming (malodourous or dusty) waste streams.				plant will be slowed to ensure no backlog of waste builds up on site. Should there be total power outage, all waste deliveries to the plant will cease. Processing activities carried out within the site are relatively simple. The plant includes an automatic alarm system to alert the operator of potential operational problems and where relevant will be triggered with sufficient safety margin to permit operator intervention to prevent an actual problem occurring. All operational staff will be fully trained against the site operating procedures. Training will include awareness raising of key plant parameters and the potential implications of failure to control operations as designed and the associated potential impact on the environment. Should incompatible wastes be unintentionally accepted at site, these will be temporarily stored in the external quarantine area and removed from site as soon as possible. All incidents will be recorded and investigated appropriately according to the site incident procedure.	

Washplant Management Plan

NB Clark Ltd

Butterwell DP Recycling Centre

Longhirst

Morpeth

Northumberland

NE61 3NF

EPR/LB3004MK/A001

Olive Compliance Ltd
Planet House, Northumbrian Way, Killingworth
NE12 6EH
Company Number:12861220

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1.0 Introduction

This document is the proposals of the management of water arising from the washing of aggregates and soil waste received at Butterwell Disposal Point, Longhirst, Morpeth, Northumberland, NE61 3NF.

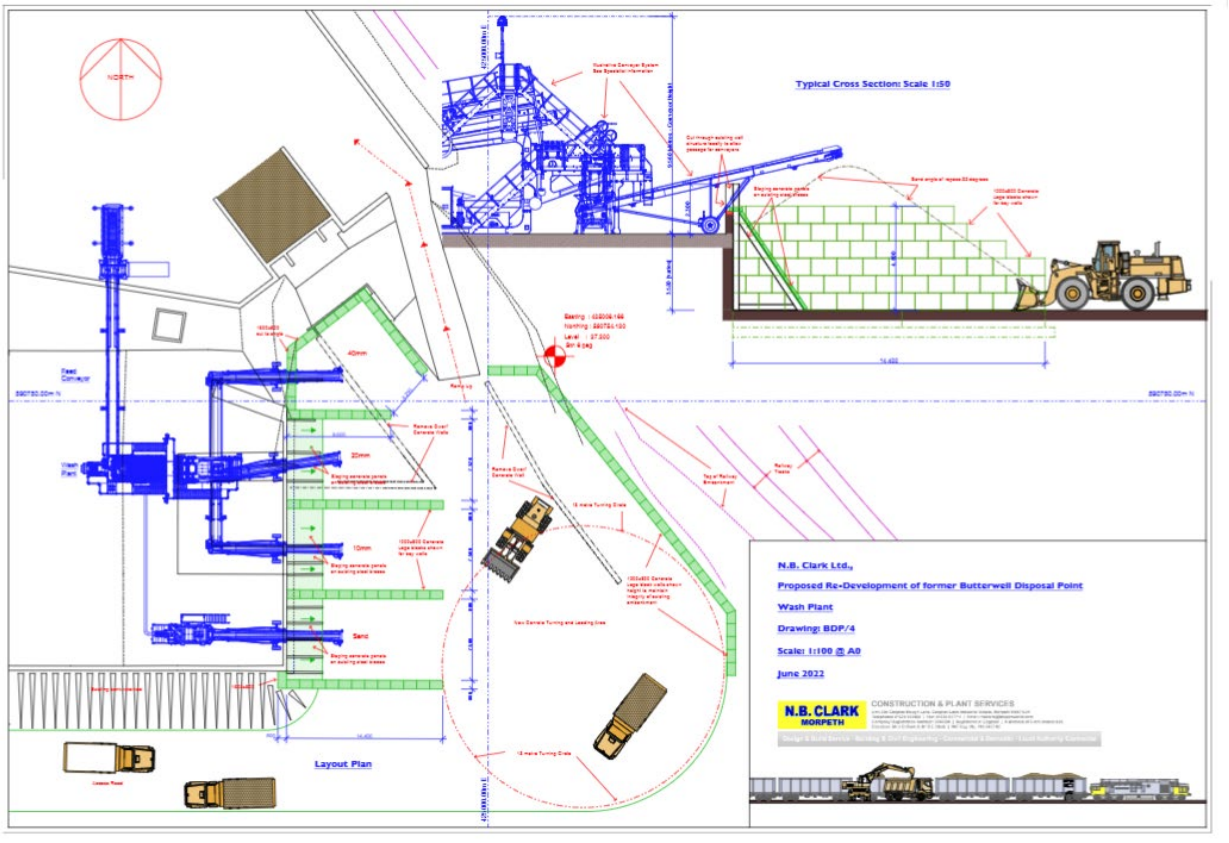
1.1 Washplant Information

Detailed specifications and layouts for the proposed wash plant are shown below.

Specified waste suitable for washing to recover clean aggregates/sand/glass will be fed into the system via a conveyor, from which the washing and grading process will begin.

Wash water is contained within a closed loop system, with no discharge from the process.

Image 1 – Wash plant System – example



The wash plant will be monitored and operated by a trained plant operator and will process incoming feedstock wastes (C&D aggregates/soils/stones) in accordance with the sites current allowed annual throughput.

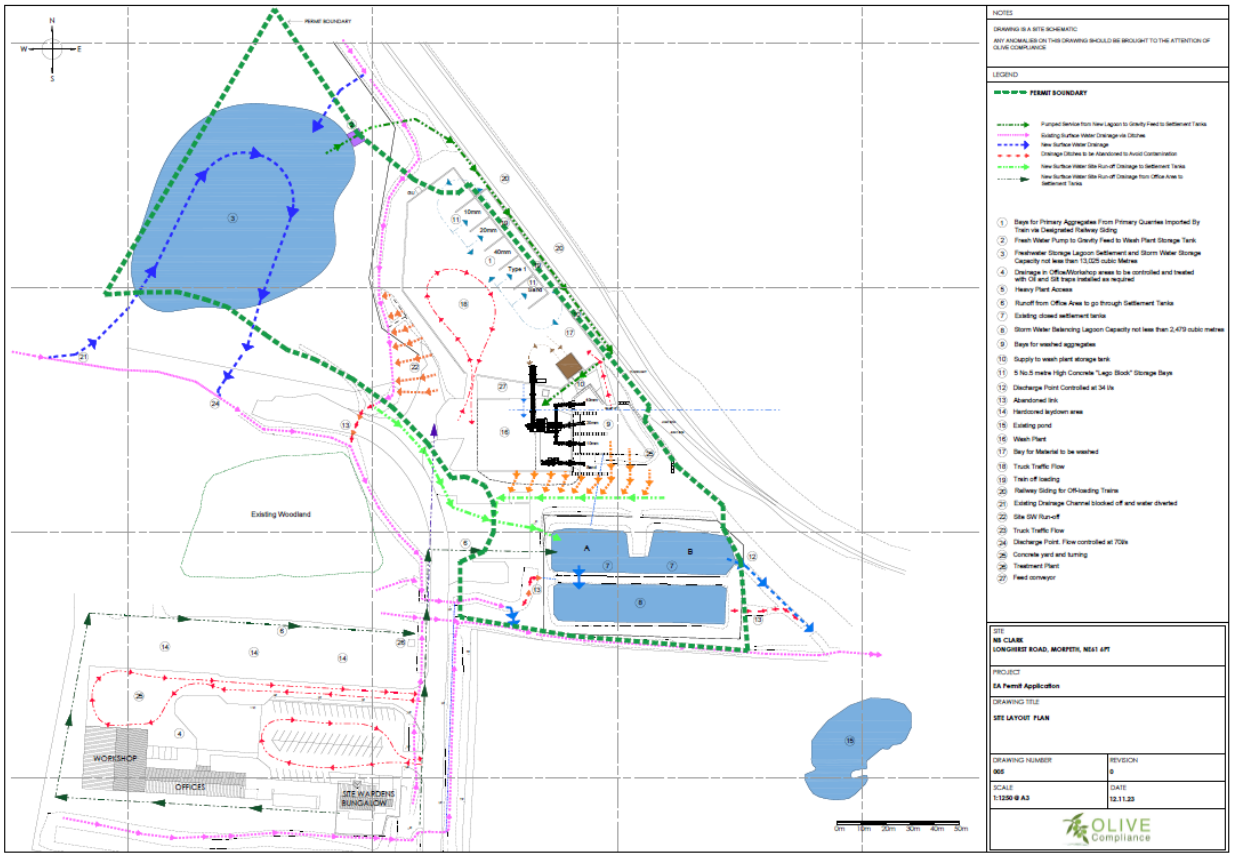
- The wash plant has been sized to process up to 80tph of C&D material. This feed

- rate may vary depending on the feed material grading and type of feed material.
- At installation phase it has been considered the possible high silt content up to 20% in the feed material and included a system to remove the silt fraction and detritus materials
- The required washed products are Fine Sand, Coarse Sand, 10mm, 20mm, 40mm aggregates
- The wash plant will be operated for 8 hours per day.
- The Operator has assumed a 60-minute cycle time.

The water supply plan below shows where washplant water supplies network. Once full it is anticipated that the wash plant will lose <10% water daily through use and evaporation. NBC proposes to keep this topped up from surface water network supply instead of mains water.

Rainwater will be harvested from onsite natural ditches located on the full area (both permitted and non-permitted) NBC site. Where a main supply is required, this will be carried out through the night.

Image 2 – Water Supply Locations (Drawing 005)



The wash water will be re-circulated within a closed loop system, with filter cake dewatered prior to leaving the plant to retain as much water as possible.

Physical barriers will be put in place to minimise water loss through the wash process. As such, it is estimated that the daily 'top-up volume' will be less than 51m^3 per day.

A flocculant (Flocculant – Product description Brenntamer CK6290) will be used to aid with the removal of suspended particles and aid with wash water retention and fines extraction. The flocculant is Non-Hazardous and has low mobility in soil and all components used in its manufacture are included in the European Inventory of Existing Chemical Substances (EINECS) or are not required to be listed on EINECS.

See data sheets in Annex 1.

Final aggregate gradings will depend on plant operations, however, at this stage, it is considered the following product and filter cake gradings can be achieved.

- 6-10 mm single size,
- 10-20 mm single size,
- 20 - 40mm single size,
- Fine sand 0- 2mm,
- Grit sand 0-4mm,
- Filter Cake (Clay for reuse)

Following washing and grading, aggregates will be stored in material storage bays which is underlain by an impermeable surface limiting the migration of residual wash water.

Filter cake will be collected and stored on an impermeable surface with sealed drainage as shown on the site drainage plan.

All plant and equipment must comply to PUWER regulations and operators must carry out prestart inspections on all plant and equipment.

A maintenance schedule is in place which includes servicing, calibration and preventive maintenance. All equipment on 3 phase power supply is subject to a 6 monthly EIRC by a competent contractor.

Return valves are installed where required, gate valves are also secured to prevent accidental release, and all operators must be trained and competent.

Emergency procedures will be put in place which will include for the following:

- Maintain a stock of repair patches
- Spill kits to be kept on site and around wash plant area
- Emergency spillage drills to be carried out
- Sludge tank and pipework emptied
- A maintenance schedule is in place which includes servicing, calibration and preventive maintenance
- 24hr Remote CCTV surveillance in operation.

The wash plant will be in operation when required in accordance with the site operating hours. No work will be undertaken in connection with the plant machinery outside of these approved hours or on any public or bank holiday.

The benefits of the system that by rinsing, screening, scrubbing aggregates removes residues and maximises the recycling of natural resource for reuse as a product.

1.2 Washplant Waste Streams

The below incoming wastes are deemed suitable for washing to recover and recycle soils, stone/aggregates, sand and minerals.

01 04 08	waste gravel and crushed rocks other than those mentioned in 01 04 07
01 04 09	waste sand and clays
10 11 12	waste glass other than those mentioned in 10 11 11
10 12 08	waste ceramics, bricks, tiles and construction products (after thermal processing)
10 13 14	waste concrete (only) no sludge
15 01 07	clean glass
17 01 01	concrete
17 01 02	bricks
17 01 03	tiles and ceramics
17 01 07	mixtures of concrete, bricks, tiles and ceramics other than those mentioned in 17 01 06
17 02 02	clean glass only
17 03 02	bituminous mixtures other than those mentioned in 17 03 01
17 05 04	soil and stones other than those mentioned in 17 05 03
17 05 06	dredging spoil other than those mentioned in 17 05 05
17 05 08	track ballast other than those mentioned in 17 05 07
19 12 05	clean glass only
19 12 09	minerals (for example sand, stones)
19 13 02	solid wastes from soil remediation other than those mentioned in 19 13 01
20 01 02	clean glass only
20 02 02	soil and stones

Based on waste throughputs received as C&D initially processed through the initial site treatment plant process or directly received soils/aggregates wastes.

1.3 Monitoring Requirements

The following monitoring is proposed to fulfil requirements of the Environmental permit.

Table 1
Details of Water Monitoring Parameters

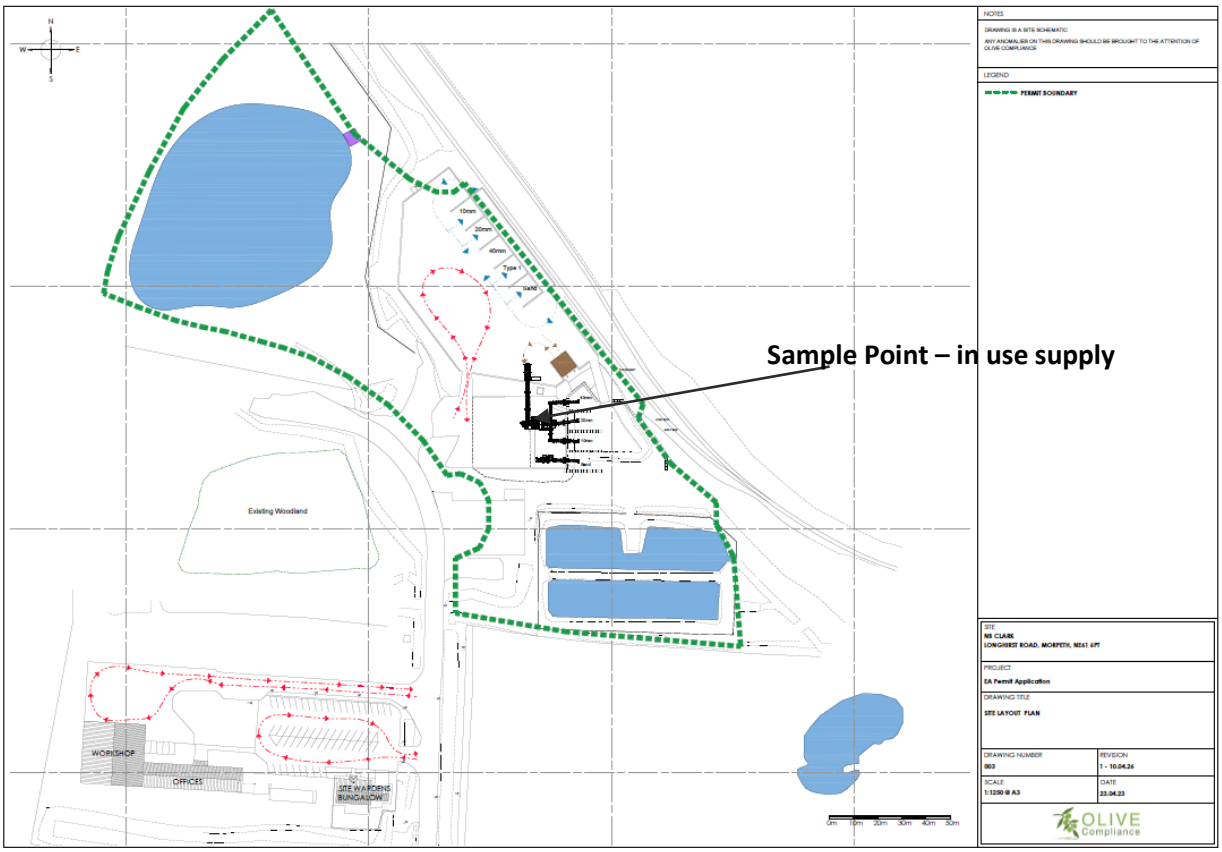
Substance	
Chromium	Zinc
Tin	Nickel
Arsenic	Manganese
Cadmium	Aluminium
Mercury	Total TPH's (No visible oil films)
Copper	PAH's (benzo(a)pyrene)
Iron	Lead

1.4 Sampling Locations

Details of the sampling points are presented in Table 2.

Table 2
Details of Water Monitoring Points

Monitoring Point	Type	Location	Purpose
Wash plant water	In use water	Wash Plant	Wash plant water for material treatment



1.5 Monitoring Frequency

NBC will conduct daily monitoring of water quality and inline circulated water supply to the wash plant with an olfactory and visual check of the water at the Sample point and recorded on the daily inspection form. Trained staff will be looking for the below:

- visible signs of oil contamination or cloudy discoloured water
- identify contaminates such as heavy solids or sludges within the water
- identify any petroleum, diesel or sulphurous odours within the water

In addition, all material processed through the plant is inspected pre and post treatment thought the plant, where any visual or continuation would be identified.

REM will conduct formal chemical monthly monitoring of water quality and inline circulated water supply to the wash plant.

Table 3 - Washplant Water Monitoring Schedule

Monitoring Event	Date
1	January
2	February

Monitoring Event	Date
3	March
4	April
5	May
6	June
7	July
8	August
9	September
10	October
11	November
12	December

2.0 Sampling

2.1 Site Supervision and Sampling

All sampling activities will be completed by a suitably trained engineer/consultant, in general accordance with BS EN ISO 15667-11:2009.

All samples will be taken within appropriate sampling containers and transported to the laboratory within 24hours of sampling.

2.1.1 Wash water testing

Samples for chemical analysis will be collected during each monitoring visit from each monitoring location using dedicated disposable bailers.

2.1.2 Testing

Samples taken will be analysed as per the above determinands detailed by the Operator.

2.1.3 Reporting

The testing company will issue a report that include the following:

- Factual information on the work undertaken, including, Laboratory testing certificates.

Monitoring equipment, techniques, personnel and organisations employed for the monitoring programme shall have either MCERTS certification or MCERTS accreditation (as appropriate), where available.

3.0 Review of Testing Results

3.1 Sampling Limits

3.1.1 Compliance

Maximum assessment levels and trigger levels have been set for the below selected parameters.

Table 4 - Assessment and trigger levels for water sampling

Substance	Maximum Concentration mg/l dissolved	Trigger Concentration mg/l dissolved
Chromium	0.01mg/l	0.005mg/l
Tin	0.5mg/l	0.2mg/l
Arsenic	0.01mg/l	0.005mg/l
Cadmium	0.02mg/l	0.001mg/l
Mercury	0.01mg/l	0.005mg/l
Copper	0.01ml/g	0.005ml/g
Iron	10mg/l	5mg/l
Lead	0.01mg/l	0.005mg/l
Zinc	0.1mg/l	0.05mg/l
Nickel	0.01mg/l	0.005mg/l
Manganese	0.1mg/l	0.05mg/l
Aluminum	0.5mg/l	0.2.5mg/l
Total TPH's	No visible oil films	No visible oil films
PAH's (benzo(a)pyrene)	0.01mg/l	0.005mg/l

The above limits have been proposed with regard to The Trade Effluents (Prescribed Processes and Substances) Regulations 1989, M18 TGN and information provided from consultant Hydrogeologist & Hydrologist.

The water will not be discharged however sampling methodology has been based on the risk of residual water within finished product or may leak from the system.

3.2 Review of Data

The Operator will review the testing results (usually received within 5-10days) against the limits in Table 4. Any exceedances of the maximum limits will automatically action the cessation of the wash plant.

3.3 Trigger Level Actions

In the event there are exceedances of the set trigger levels of the determinants within the monthly wastewater testing results specified within the testing suite, an audit of all incoming wastes received and processed from the previous month will be undertaken to identify any potential sources of contaminated inert material received on site and comparison with testing results.

Checks will include the review of pre acceptance testing, external site visits, aggregate testing, daily inspections, and potential site issues such as (failure of plant/equipment/leaks) over the testing period.

Testing of the wash plant waster will be conducted immediately to verify the water quality prior to any cessation of the plant to either validate the current water condition while investigations continue.

A review of the further water quality testing and site investigations will be conducted to either sign off the event as a one off or will trigger remedial action detailed in Section 3.5.

In the event waste materials or products on site are identified as the potential source of the trigger exceedance, testing will be conducted to classify any hazardous properties within the remaining materials on site and to identity recovery or disposal routes where appropriate.

3.4 Maximum Levels Breach Actions

In the event there is an exceedance of levels of the determinants maximums levels within the monthly wastewater testing results specified within the testing suite, the plant will be shut down, with an audit of all incoming wastes received and processed from the previous month will be undertaken to identify any potential sources of contaminated inert material received on site and comparison with testing results.

Checks will include the review of pre acceptance testing, external site visits, aggregate testing, daily inspections, and potential site issues such as (failure of plant/equipment/leaks) over the testing period.

In the event waste materials or products on site are identified as the source of the exceedance, testing will be conducted to classify any hazardous properties within the remaining materials on site and to identity recovery or disposal routes where appropriate.

3.5 Remediation

The water system will then be shut down, with washing activities ceased. The wash plant will be drained directly into the closed sump and the system flushed using mains water, then and cleaned with Airopure (see Annex 2), then flushed again.

The wastewater will then be sent to a permitted waste facility, with additional testing conducted if required to identify the properties of the wastewater to identify the appropriate legal waste recovery/disposal route before removal off site.

Within 2 weeks of the wash plant recommencing activities, further in use wash water testing will be undertaken within the wash plant to demonstrate water quality and elimination of contamination.

3.6 Investigation Process

In the event there are exceedances of levels of the determinants (both trigger and maximums) within the monthly wastewater testing results specified within the testing suite, an audit of all incoming wastes received and processed from the previous month will be undertaken to identify any potential sources of contaminated inert material received on site and comparison with testing results.

Checks will include the review of pre acceptance testing, external site visits, aggregate testing, daily inspections, and potential site issues such as (failure of plant/equipment/leaks) over the testing quarterly period.

In the event waste materials or products on site are identified as the source of the exceedance, testing will be conducted to classify any hazardous properties within the remaining materials on site and to identity recovery or disposal routes where appropriate.

Contact with clients and customers will also be undertaken.

An EA notification via a Schedule 5 will also be undertaken within 24hrs as per the permit condition below.

Notification requirements for any malfunction, breakdown or failure of equipment or techniques, accident, or emission of a substance not controlled by an emission limit which has caused, is causing or may cause significant pollution.

4.0 Leaks and Spills

NBC have procedures for investigating and recording any incidents and non-conformances at the site, and for taking any corrective action as part of their Management System.

The Accident and Incident Plan will include the wash plant activity to cover:

- Malfunction, breakdown or failure of the washplant
- Leaks and Spills from the washplant

All staff are trained to detect and report any such occurrences. Procedures will be taken to allow operations to resume, and preventative measures may be put in place to ensure that the incident/failures do not reoccur. Records will be kept of any incident and non-compliances as well as the investigations and remediation undertaken.

REM have emergency spillage procedures are in place to ensure any oil, hydraulic fluids are dealt with before they enter the site drainage system. Spill kits are located around the site and staff are fully trained on spill management and reporting.

The site has a drainage system that can be sealed off to prevent discharge of wash water in the event of an incident. Using a penstock valve the interceptor can be closed to retain all water on site.

All washing activities are undertaken on an impermeable surface with sealed drainage to prevent the escape and any potential pollution of potentially contaminated liquids into groundwater.

In the event of a spill or leak from the wash plant, this activity will be ceased whilst the emergency procedure is followed, the direct cause of the spill/leak identified and routine maintenance is

undertaken. In the event of a spill and/or leak on-site, the Operator will follow their operating procedures whereby the emergency action plan will be implemented.

Leakages/spills of wash water will be contained using absorbent spill granules and booms to reduce the spread of any excess water. Should it be necessary, this process will be supported by external spill response teams or waste water contractor.

All fuels and oils will be stored in secondary containment with an integral bund which has capacity greater than 110% of the tank. Storage will occur on impermeable surface.

A record of the spill incident and remedial action taken will be recorded in the site diary recording systems. And all water and waste airings from the spill will be taken to a suitably permitted facility with the correct duty of care information.

5.0 Conclusion

This document is considered to be a 'working' document that will be reviewed and updated annually or as required should any of the following occur:

- An exceedance of testing parameters on site;
- the results of any testing of this document indicate that changes are required;
- a change or review of legislation; or
- if the site is instructed to do so by the EA.

Appendices

ConnectingChemistry

BRENNTAG

SAFETY DATA SHEET according to Regulation (EC) No. 1907/2006

Brenntamer CK6290

Version 1.0 Print Date 2022/03/21

Revision date / valid from 2022/03/21

SECTION 1: Identification of the substance/mixture and of the company/undertaking

1.1. Product identifier

Trade name : Brenntamer CK6290

1.2. Relevant identified uses of the substance or mixture and uses advised against

Use of the Substance/Mixture : Process aid for industrial applications

Uses advised against : At this moment we have not identified any uses advised against

1.3. Details of the supplier of the safety data sheet

Company : Brenntag Chemicals Distribution (Ireland) Limited
Unit 405, Grants Drive, Greenogue Business Park
IE DUBLIN 24 Rathcoole

Telephone : 00 353 (0)1 4013500

Telefax : 00 353 (0)1 4013501

E-mail address : msds@brenntag.ie

1.4. Emergency telephone number

Emergency telephone number : EMERGENCY ONLY TELEPHONE NUMBER:
00 32 (0) 3 575 55 55 (SGS Emergency Response Services - 24 hours)

SECTION 2: Hazards identification

2.1. Classification of the substance or mixture

Classification according to Regulation S.I. 2019/720 (GB CLP)

Regulation S.I. 2019/720 (GB CLP)			
Hazard class	**Hazard category**	**Target Organs**	**Hazard statements**
Long-term (chronic) aquatic hazard	Category 3	---	H412

For the full text of the H-Statements mentioned in this Section, see Section 16.

Most important adverse effects

Human Health	:	See section 11 for toxicological information.
Physical and chemical hazards	:	See section 9/10 for physicochemical information.
Potential environmental effects	:	See section 12 for environmental information.

2.2. Label elements

Labelling according to Regulation S.I. 2019/720 (GB CLP)

Hazard statements	:	H412	Harmful to aquatic life with long lasting effects.
Precautionary statements			
Prevention	:	P273	Avoid release to the environment.
Disposal	:	P501	Dispose of contents/ container to an approved waste disposal plant.

Other labelling information:

Further information	:	Handle in accordance with good industrial hygiene and safety practice.

2.3. Other hazards

For Results of PBT and vPvB assessment see section 12.5.

SECTION 3: Composition/information on ingredients

3.2. Mixtures

Hazardous components	Amount [%]	Classification (Regulation S.I. 2019/720 (GB CLP))	
		Hazard class / Hazard category	Hazard statements
1,2-Ethanediamine, polymer with 2-(chloromethyl)oxirane and N-methylmethanamine			
CAS-No. : 42751-79-1	25 - 75	Aquatic Chronic3	H412

For the full text of the H-Statements mentioned in this Section, see Section 16.

SECTION 4: First aid measures

4.1. Description of first aid measures

General advice	: No special precautions required.
If inhaled	: Remove to fresh air. If symptoms persist, call a physician.
In case of skin contact	: Wash off with soap and water. If skin irritation persists, call a physician. Remove contaminated clothing and shoes.
In case of eye contact	: Rinse immediately with plenty of water, also under the eyelids, for at least 15 minutes. Alternatively, rinse immediately with Diphoterine. Immediate medical attention is required.
If swallowed	: Clean mouth with water and drink afterwards plenty of water. Never give anything by mouth to an unconscious person. If symptoms persist, call a physician. Do NOT induce vomiting.

4.2. Most important symptoms and effects, both acute and delayed

Symptoms	: See Section 11 for more detailed information on health effects and symptoms.
Effects	: Health injuries are not known or expected under normal use. See Section 11 for more detailed information on health effects and symptoms.

4.3. Indication of any immediate medical attention and special treatment needed

Treatment	: Treat symptomatically.

SECTION 5: Firefighting measures

5.1. Extinguishing media

Suitable extinguishing media	:	Use extinguishing measures that are appropriate to local circumstances and the surrounding environment. Water, Water spray, foam, dry powder or CO2.
Unsuitable extinguishing media	:	High volume water jet

5.2. Special hazards arising from the substance or mixture

Specific hazards during firefighting	:	Contaminated surfaces will be extremely slippery.
Hazardous combustion products	:	Carbon monoxide, Carbon dioxide (CO2), Hydrogen chloride gas, Nitrogen oxides (NOx), Hydrogen cyanide (hydrocyanic acid)

5.3. Advice for firefighters

Special protective equipment for firefighters	:	In the event of fire, wear self-contained breathing apparatus.Choose protective equipment according to size of fire.
Further advice	:	Collect contaminated fire extinguishing water separately. This must not be discharged into drains.Fire residues and contaminated fire extinguishing water must be disposed of in accordance with local regulations.

SECTION 6: Accidental release measures

6.1. Personal precautions, protective equipment and emergency procedures

Personal precautions	:	Use personal protective equipment. Ensure adequate ventilation. Avoid contact with skin and eyes. Contaminated surfaces will be extremely slippery.

6.2. Environmental precautions

Environmental precautions	:	Do not flush into surface water or sanitary sewer system. Avoid subsoil penetration. If the product contaminates rivers and lakes or drains inform respective authorities. If material reaches soil inform authorities responsible for such cases.

6.3. Methods and materials for containment and cleaning up

Methods and materials for containment and cleaning up	:	Use mechanical handling equipment. Keep in suitable, closed containers for disposal.
	:	Absorb with liquid-binding material (sand, diatomite, acid binders, universal binders).
Further information	:	Treat recovered material as described in the section "Disposal considerations".

6.4. Reference to other sections

See Section 1 for emergency contact information.
See Section 8 for information on personal protective equipment.
See Section 13 for waste treatment information.

SECTION 7: Handling and storage

7.1. Precautions for safe handling

Advice on safe handling	:	Keep container tightly closed. Ensure adequate ventilation. Handle in accordance with good industrial hygiene and safety practice. Avoid contact with eyes. Contaminated surfaces will be extremely slippery.
Hygiene measures	:	Keep away from food, drink and animal feedingstuffs. Smoking, eating and drinking should be prohibited in the application area. Wash hands before breaks and at the end of workday. Take off all contaminated clothing immediately.

7.2. Conditions for safe storage, including any incompatibilities

Requirements for storage areas and containers	:	Store in original container.
Advice on protection against fire and explosion	:	Normal measures for preventive fire protection.
Further information on storage conditions	:	Keep tightly closed in a dry and cool place. Keep away from heat. Keep away from sources of ignition - No smoking. Keep away from direct sunlight. freezing
Advice on common storage	:	Keep away from food, drink and animal feedingstuffs.

7.3. Specific end use(s)

Specific use(s)	:	No information available.

SECTION 8: Exposure controls/personal protection

8.1. Control parameters

Other Occupational Exposure Limit Values

(Additional) Information	:	Contains no substances with occupational exposure limit values.

8.2. Exposure controls

Appropriate engineering controls

Refer to protective measures listed in sections 7 and 8.

Personal protective equipment

Respiratory protection

Advice	:	No personal respiratory protective equipment normally required.

Hand protection

Advice	:	Protective gloves complying with EN 374. Please observe the instructions regarding permeability and breakthrough time which are provided by the supplier of the gloves. Also take into consideration the specific local conditions under which the product is used, such as the danger of cuts, abrasion, and the contact time. Protective gloves should be replaced at first signs of wear.
Material	:	PVC

Eye protection

Advice	:	Safety glasses with side-shields Equipment should conform to EN 166

Skin and body protection

Advice	:	Protective work clothing

Environmental exposure controls

General advice	:	Do not flush into surface water or sanitary sewer system. Avoid subsoil penetration. If the product contaminates rivers and lakes or drains inform respective authorities. If material reaches soil inform authorities responsible for such cases.

SECTION 9: Physical and chemical properties

9.1. Information on basic physical and chemical properties

Form	:	liquid
Colour	:	colourless to amber
Odour	:	slight characteristic
Odour Threshold	:	No data available
pH	:	4 - 7
Melting point/freezing point	:	< 5 °C
Initial boiling point and boiling range	:	> 100 °C
Flash point	:	does not flash
Evaporation rate	:	No data available
Flammability (solid, gas)	:	No data available
Upper explosion limit	:	Not expected to create explosive atmospheres.
Lower explosion limit	:	Not expected to create explosive atmospheres.
Vapour pressure	:	2.3 kPa (20 °C)
Relative vapour density	:	No data available

Relative density	:	1.0 - 1.2
Water solubility	:	completely miscible
Partition coefficient: n-octanol/water	:	log Kow < 0
Auto-ignition temperature	:	Does not ignite
Thermal decomposition	:	> 150 °C
Viscosity, dynamic	:	No data available
Explosivity	:	No data available
Oxidizing properties	:	no oxidising properties predicted from the structure

9.2. Other information

No further information available.

SECTION 10: Stability and reactivity

10.1. Reactivity

Advice : Stable under recommended storage conditions.

10.2. Chemical stability

Advice : Stable under recommended storage conditions.

10.3. Possibility of hazardous reactions

Hazardous reactions : None known.

10.4. Conditions to avoid

Conditions to avoid : Protect from frost, heat and sunlight.
Thermal decomposition : > 150 °C

10.5. Incompatible materials

Materials to avoid : None known.

10.6. Hazardous decomposition products

Hazardous decomposition products : Hydrogen chloride gas, Nitrogen oxides (NOx), Carbon dioxide (CO2), Carbon monoxide, Hydrogen cyanide (hydrocyanic acid)

SECTION 11: Toxicological information

11.1. Information on toxicological effects

Data for the product

Acute toxicity

Oral

LD50 : > 5000 mg/kg)

Inhalation

Tests has not been carried out because inhalation exposure in humans is unlikely.

Dermal

LD50 : > 5000 mg/kg)

Irritation

Skin

Result : Not classified

Eyes

Result : slight irritation

Sensitisation

Result : not sensitizing

CMR effects

CMR Properties

Carcinogenicity : Based on available data, the classification criteria are not met.
Mutagenicity : Based on available data, the classification criteria are not met.
Reproductive toxicity : Based on available data, the classification criteria are not met.

Specific Target Organ Toxicity

Single exposure

Repeated exposure

Other toxic properties

Repeated dose toxicity

No data available

Aspiration hazard

No data available

Component:	1,2-Ethanediamine, polymer with 2-(chloromethyl)oxirane and N-methylmethanamine	CAS-No. 42751-79-1
Acute toxicity		
Oral		
LD50	: > 2000 mg/kg (Rat)	
Inhalation		
LC50	: > 20 mg/l (Rat; 4 h)	
Dermal		
LD50	: > 2000 mg/kg (Rabbit)	

SECTION 12: Ecological information

12.1. Toxicity

Component:	1,2-Ethanediamine, polymer with 2-(chloromethyl)oxirane and N-methylmethanamine	CAS-No. 42751-79-1
Acute toxicity		
Fish		
LC50	: 10 - 100 mg/l (Danio rerio (zebra fish); 96 h) (OECD Test Guideline 203)	
Toxicity to daphnia and other aquatic invertebrates		
EC50	: 10 - 100 mg/l (Daphnia magna (Water flea); 48 h) (OECD Test Guideline 202)	
algae		
IC50	: 10 - 100 mg/l (Pseudokirchneriella subcapitata (microalgae); 72 h) (OECD Test Guideline 201)	

12.2. Persistence and degradability

Component:	1,2-Ethanediamine, polymer with 2-(chloromethyl)oxirane and N-methylmethanamine	CAS-No. 42751-79-1

Persistence and degradability

Biodegradability

Result : < 70 % (Exposure Time: 28 d)(OECD Test Guideline 301)Not readily biodegradable.

12.3. Bioaccumulative potential

12.4. Mobility in soil

12.5. Results of PBT and vPvB assessment

Data for the product

Results of PBT and vPvB assessment

Result : This substance/mixture contains no components considered to be either persistent, bioaccumulative and toxic (PBT), or very persistent and very bioaccumulative (vPvB) at levels of 0.1% or higher.

12.6. Other adverse effects

Data for the product

Additional ecological information

Result : Do not flush into surface water or sanitary sewer system. Avoid subsoil penetration.

SECTION 13: Disposal considerations

13.1. Waste treatment methods

Product : Disposal together with normal waste is not allowed. Special disposal required according to local regulations. Do not let product enter drains. Contact waste disposal services.

Contaminated packaging : Empty contaminated packagings thoroughly. They can be recycled after thorough and proper cleaning. If recycling is not practicable, dispose of in compliance with local regulations.

European Waste Catalogue Number : No waste code according to the European Waste Catalogue can be assigned for this product, as the intended use dictates the assignment. The waste code is established in consultation with the regional waste disposer.

SECTION 14: Transport information

Not dangerous goods for ADR, RID, IMDG and IATA.

14.1. UN number

Not applicable.

14.2. UN proper shipping name

Not applicable.

14.3. Transport hazard class(es)

Not applicable.

14.4. Packaging group

Not applicable.

14.5. Environmental hazards

Not applicable.

14.6. Special precautions for user

Not applicable.

14.7. Transport in bulk according to Annex II of MARPOL 73/78 and the IBC Code

IMDG : Not applicable.

SECTION 15: Regulatory information

15.1. Safety, health and environmental regulations/legislation specific for the substance or mixture

Component:	**1,2-Ethanediamine, polymer with 2-(chloromethyl)oxirane and N-methylmethanamine**	**CAS-No. 42751-79-1**

EU. Directive 2012/18/EU (SEVESO III) on major accident hazards involving dangerous substances, Annex I : ; The substance/mixture does not fall under this legislation.

Germany. Ordinance on Facilities Handling Substances that are Hazardous to Water, ((AwSV of 21 April 2017), UBA, BAnz AT), as amended	:	WGK 2: obviously hazardous to water: 4,442

15.2. Chemical safety assessment

No data available

SECTION 16: Other information

Full text of H-Statements referred to under sections 2 and 3.

H412	Harmful to aquatic life with long lasting effects.

Abbreviations and Acronyms

AU AIICL	Australia. Industrial Chemicals Act (AIIC) List
BCF	bioconcentration factor
BOD	biochemical oxygen demand
CAS	Chemical Abstracts Service
CLP	Classification, Labelling and Packaging
CMR	carcinogenic, mutagenic or toxic to reproduction
COD	chemical oxygen demand
DNEL	derived no-effect level
DSL	Canada. Environmental Protection Act, Domestic Substances List
EINECS	European Inventory of Existing Commercial Chemical Substances
ELINCS	European List of Notified Chemical Substances
ENCS (JP)	Japan. Kashin-Hou Law List
GHS	Globally Harmonized System of Classification and Labelling of Chemicals
IECSC	China. Inventory of Existing Chemical Substances
INSQ	Mexico. National Inventory of Chemical Substances
ISHL (JP)	Japan. Inventory of Industrial Safety & Health
KECI (KR)	Korea. Existing Chemicals Inventory
LC50	median lethal concentration
LOAEC	lowest observed adverse effect concentration
LOAEL	lowest observed adverse effect level
LOEL	lowest observed effect level
NDSL	Canada. Environmental Protection Act. Non-Domestic Substances List
NLP	no-longer polymer

NOAEC	no observed adverse effect concentration
NOAEL	no observed adverse effect level
NOEC	no observed effect concentration
NOEL	no observed effect level
NZIOC	New Zealand. Inventory of Chemicals
OECD	Organisation for Economic Cooperation and Development
OEL	occupational exposure limit
ONT INV	Canada. Ontario Inventory List
PBT	persistent, bioaccumulative and toxic
PHARM (JP)	Japan. Pharmacopoeia Listing
PICCS (PH)	Philippines. Inventory of Chemicals and Chemical Substances
PNEC	predicted no-effect concentration
REACH Auth. No.:	REACH Authorisation Number
REACH AuthAppC. No.	REACH Authorisation Application Consultation Number
STOT	specific target organ toxicity
SVHC	substance of very high concern
TCSI	Taiwan. Existing Chemicals Inventory
TH INV	Thailand. Existing Chemicals Inventory from FDA
TSCA	US. Toxic Substances Control Act
UVCB	substance of unknown or variable composition, complex reaction products or biological materials
VN INVL	Vietnam. National Chemical Inventory
vPvB	very persistent and very bioaccumulative

Further information

Key literature references and sources for data	:	Supplier information and data from the "Database of registered substances" of the European Chemicals Agency (ECHA) were used to create this safety data sheet.
Methods used for product classification	:	The classification for human health, physical and chemical hazards and environmental hazards were derived from a combination of calculation methods and if available test data.
Hints for trainings	:	The workers have to be trained regularly on the safe handling of the products based on the information provided in the Safety Data Sheet and the local conditions of the workplace. National regulations for the training of workers in the handling of hazardous materials must be adhered to.
Other information	:	The information provided in this Safety Data Sheet is correct to our knowledge at the date of its revision. The information given only describes the products with regard to safety arrangements and is not to be considered as a warranty or quality specification and does not constitute a legal relationship. The information contained in this Safety Data Sheet relates only to the specific material designated and may not be valid for such material used in combination with

any other material or in any process, unless specified in the text.

|| Indicates updated section.