OPERATING TECHNIQUES

NB Clark Ltd

Butterwell DP Recycling Centre

Longhirst

Morpeth

Northumberland

NE61 3NF

EPR/LB3004MK/A001

CONTENTS

1.0 Introduction 1

1.1 Report Structure 1

2.0 MANAGEMENT 2

2.0 Management System 2

2.0.1 Management Structure and Responsibilities 2

2.0.2 Technical Competence and Training 2

2.0.3 Site Security 3

2.0.4 Permit Surrender 3

2.0.5 Display of Environmental Permit 4

2.0.6 Managing Documentation and Records 4

2.0.7 Reporting Non-Compliance and Taking Corrective Action 4

2.0.8 Auditing and Legal Compliance 4

2.0.9 Monitoring, Measuring and Reviewing Environmental Performance 5

2.0.10 Operational Control, Preventative Maintenance and Calibration 5

2.0.11 Design and Construction Quality Assurance 5

2.1 Accident Management Plan 5

2.1.1 Hazard Identification 5

2.1.2 Unauthorised Waste 6

2.1.3 Fire Prevention Plan 6

2.1.4 Loss of Containment 6

2.1.5 Security and Vandalism 7

2.1.6 Flooding 7

3.0 OPERATIONS 9

3.0 Process Description 9

3.1 Permitted Activities 9

3.1.1 Permitted Types and Quantities of Waste 9

3.2 Waste Acceptance 9

3.2.1 Hours of Operation 9

3.2.2 Load Inspection and Waste Control 10

3.2.3 Means of Measurement 10
3.3 Waste Storage 10
3.4 Waste Treatment 10
3.5 Site Infrastructure and Equipment 11
3.5.1 Site Identification Board 11
3.5.2 Plant and Equipment 11
4.0 EMISSIONS AND MONITORING 11
4.0 Engineered Containment 11
4.0.1 Containment Bunding 12
4.1 Odour 12
4.2 Dust 13
4.3 Noise 13
4.4 Pests 14
4.5 Litter 14
4.6 Mud and Debris 15
5.0 INFORMATION 15
5.1 Changes in Technically Competent Persons 15
5.2 Waste Types and Quantities 16
5.3 Relevant Convictions 16
5.4 Notification of Change of Operator's or Holder's Details 16
5.5 Adverse Effects 16
5.6 Closure 16
6.0 CLOSURE 16

Basis of Report

This report has been prepared by Olive Compliance Ltd with all reasonable skill, care and diligence, and taking account of the manpower and resources devoted to it by agreement with the client.

Information reported herein is based on the interpretation of data collected and has been accepted in good faith as being accurate and valid.

This report is for the exclusive use of NB Clark Ltd , no warranties or guarantees are expressed or should be inferred by any third parties. This report may not be relied upon by other parties without written consent from Olive Compliance Ltd.

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

Information reported herein may be based on the interpretation of public domain data collected by Olive Compliance Ltd, information supplied by the Client and its other advisors and associates. The data has been accepted in good faith as being accurate and valid.

The copyright and intellectual property in all drawings, reports, specifications, bills of quantities, calculations and other information set out in this report remain vested in Olive Compliance Ltd unless the terms of appointment state otherwise.

1.0 Introduction

NB Clark Ltd (NBC) has instructed Olive Compliance Limited (OCL) to prepare an application for a Bespoke Environmental Permit Application for an inert waste transfer station, with treatment at Butterwell Disposal Point, Longhirst, Morpeth, Northumberland, NE61 3NF.

This document provides a summary of the regulated facility, an explanation of exactly what is being applied for, and a summary of the key technical standards and control measures that will be implemented at the site as a result of the application.

1.1 Report Structure

This report describes the operating techniques that are to be implemented at the facility to ensure compliance with the conditions of the Environmental Permit. The report has been drafted to satisfy the requirements of Environmental Agency (EA) Guidance[1] and is divided into the following Sections.

Section 1 Introduction

Section 2 Management

Section 3 Operations

Section 4 Emissions and Monitoring

Section 5 Information

Section 6 Closure

[1]www.gov.uk/guidance/risk-assessments-for-your-environmental-permit

2.0 Management

2.0 Management System

NBC operate their own in-house management system which ensures that;

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

The management system is supplemented by this document which outlines the operating techniques at the site and demonstrates conformance with the requirements of relevant Environment Agency guidance.

The company is committed to continuous improvement to ensure they have best practice processes in place. Surveillance audits and certifications further demonstrate the effectiveness of company management systems.

2.0.1 Management Structure and Responsibilities

The Operations Manager/Site Manager is responsible for day-to-day operations and compliance with the Environmental Permit.

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

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

2.0.2 Technical Competence and Training

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

- all staff will have clearly defined roles and responsibilities;
- records will be maintained of the skills required for each post;
- records will be maintained of the training and relevant qualifications undertaken by staff to meet the requirement of each post; and
- operations will be governed by standard operating instructions.

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

Certificates are included within the application for the Technically Competent Manager.

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

The assessment of training needs will be reviewed on an annual basis.

Details of staff training procedures and recording are included in the company's Quality Environmental Management System.

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

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

2.0.3 Site Security

Details of site security are included within the company EMS.

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

- A 2.4-metre-high palisade fence with lockable gates protects the facility;
- Daily visual inspections of the site infrastructure, carried out by the Site Management Team will identify any unsatisfactory fence conditions, e.g. evidence of trespass.
- If appropriate, a temporary repair will be made immediately and permanent repairs will be programmed in for completion within a 15 working day period;
- To ensure the security of the site and prevent access during non-operational times by vehicles and pedestrians the gates will be locked at times when the site is not active;
- The site will be inspected at the commencement of each working day. Any defects or damage which compromises the integrity of the enclosure will be made secure by temporary repair as soon as is practicable. Permanent repairs will be affected as soon as practicable;
- All inspections, any defects, damage, or repairs will be recorded in the site diary; and
- The site has a CCTV system which was installed and is monitored by a UKAS-Accredited Security Monitoring Organisation.

A copy of the Site Inspection Document is included in the EMS within the application.

2.0.4 Permit Surrender

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

Records to be maintained will include:

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

2.0.5 Display of Environmental Permit

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

2.0.6 Managing Documentation and Records

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

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

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

Records will be made and kept up to date on a daily basis to reflect deliveries, on site treatment and dispatches. All records relating to waste acceptance will be maintained and kept readily available on site and kept for a minimum of 2 years after the waste has been removed off site.

2.0.7 Reporting Non-Compliance and Taking Corrective Action

Procedures as detailed in Sections 3.3 and the company Accident Management Plan will ensure appropriate corrective action is taken in response to problems identified at the site. The procedure will ensure that non-conformances are reported, investigated and rectified, and that failures and weaknesses are prevented. The following aspects will be considered:

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

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

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

2.0.8 Auditing and Legal Compliance

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

2.0.9 Monitoring, Measuring and Reviewing Environmental Performance

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

2.0.10 Operational Control, Preventative Maintenance and Calibration

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

The Site maintains a planned preventative maintenance (PPM) scheme where items of non-compliance are recorded, and appropriate timescales and owners are identified according to priority.

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

The relevant procedures are contained in Section S3

2.0.11 Design and Construction Quality Assurance

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

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

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

2.1 Accident Management Plan

The company recognises the importance of the prevention of accidents that may have environmental consequences and that it is crucial to limit those consequences.

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

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

A copy of the most current accident management plan is included in this document as Appendix C (EMS 003).

2.1.1 Hazard Identification

The following accident hazards have been identified from the Environment Agency's Generic Risk Assessments;

- Unauthorised Waste Acceptance;
- Flooding;
- Arson and/or Vandalism;

- Accidental Fire; and
- Spillage of Liquids.

The company will employ a number of measures to prevent the realisation of these hazards to the environment and human health.

2.1.2 Unauthorised Waste

Acceptance of unauthorised materials has the potential to cause harm to the environment and human health for example the receipt of dusty wastes could impact the amenity of the site's neighbours. All wastes received at the site will be subject to inspection and checking against the declaration on the waste transfer note. In the event that unauthorised waste is delivered to the site, the waste will be segregated and stored in a designated quarantine area within the building prior to export from site to a suitably permitted facility for recovery or disposal.

The QMS waste acceptance procedures are included in this document as Appendix A (EMS 002).

2.1.3 Fire Prevention Plan

The risk of accidental combustion of the waste types accepted at the site is low. Notwithstanding this, to prevent and minimise the potential impact of fire, the company have an EA approved Fire Prevention Plan (See FPP Section 7 of this application). A brief summary of the measures which will be employed is as follows:

- incompatible materials will not be accepted at the site;
- the plant inspection schedule will include checks of electrical equipment within the site to ensure that any faults are identified and repaired;
- fire extinguishers will be provided at designated locations;
- smoking will not be permitted in the operational areas of the site;
- working practices will ensure the assessment of fire hazards and training of employees in fire prevention, e.g. the use of fire extinguishers and emergency procedures; and
- no wastes will be burned on the site and any fire at the site will be treated as an emergency.

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

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

2.1.4 Loss of Containment

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

- *Containment system:* any facilities for the storage of oils, fuels or chemicals will be sited above ground on impervious bases and surrounded by impervious bund walls. The volume of the bunded compound will be at least the equivalent to the capacity of the tank plus 10%. All filling points, vents and gauges will be located within the bund.
- *Storage tanks:* storage tanks will be constructed to the appropriate British Standard;
- *Inspection:* tanks will be inspected visually on a daily basis by the site staff to ensure the continued integrity of the tanks, and identify the requirement for any remedial action;

- *Spill kits*: materials suitable for absorbing and containing minor spillages will be maintained on site; and
- *Monitoring techniques:* the site staff will undertake daily monitoring for evidence of spillage and leakage.

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

- Minor spillages will be cleaned up immediately, using sand or proprietary absorbent. The resultant materials will be placed into containers and will then be removed from site and disposed of at a suitably permitted facility. The incident will be logged in the site diary.
- Any dry wastes spilled on site will be collected and transported to the appropriate area of the site.
- In the event of a major spillage, which is causing or is likely to cause polluting emissions to the environment, immediate action will be taken to contain the spillage and prevent liquid from entering surface water or drains. The spillage will be cleared immediately and placed in containers for offsite disposal, and the Environment Agency will be informed.

The spillage procedure, included in Section 3.2.1 of the EMS, details further information in regard to spillages on site and the company Accident Management Plan EMS003 (Appendix C).

2.1.5 Security and Vandalism

As detailed in Section 2.5 Security Management the following security measures are in place;

- *Site perimeter*: the site benefits from fencing around the perimeter;
- *Security gates*: will be locked at all times when the facility is unattended, and the site gate will be locked when the site is not in use at the entrance of the site;
- *Inspection*: gates and fencing extending around the site will be inspected regularly by the operations staff to identify deterioration and damage, and the need for any repairs;
- *Maintenance and repair*: fencing and gates will be maintained and repaired to ensure their continued integrity. In the event that damage is sustained repairs will be made by the end of the working day. If this is not possible, suitable measures will be taken to prevent any unauthorised access to the site and permanent repairs will be affected as soon as practicable;
- *Authorised access system*: all visitors to the site will be required to register in the visitor's book and sign out again on exit to minimise the risk of unauthorised visitors being present on site; and
- *Monitoring techniques*: operational procedures, including regular inspections will ensure continual monitoring of security provision at the site;
- *CCTV*: is installed around all operational areas of the site.

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

2.1.6 Flooding

Checks conducted on the Environment Agency Flood Risk Map, identifies the site has having a low risk of surface water flooding.

Surface water flooding, sometimes known as flash flooding:

- happens when heavy rain cannot drain away
- is difficult to predict as it depends on rainfall volume and location
- can happen up hills and away from rivers and other bodies of water

- is more widespread in areas with harder surfaces like concrete

Checks conducted on the Environment Agency Flood Risk Map, identifies the site has having a very low risk of flooding from Rivers and the Sea.

The site Accident Management Plan Section 3.16.

3.0 Operations

3.0 Process Description

The inert waste will be fed into the wash plant where it will undergo a fully automated treatment process. The washing process will allow the separation and recovery of sand, and various grades of single size clean aggregate.

Outputs from the wash process

- A small amount of plastic/wood/metal fractions
- A final silt-like fraction (filter-cake) will be produced.

Should any inert materials arrive at site, and not be deemed suitable or does not require to be subject to the washing process, they may be processed using the original crushing and screening methods to produce various grades of recycled aggregate.

NBC will apply the WRAP Quality Protocol (Current Version June 2023) to these materials to create a non-waste. This will enable the company to recover a greater number of aggregates from the materials brought into the site for treatment.

Soils will be screened and tested post treatment and re purposed off site in landscaping and development projects under the appropriate permissions and legislation.

The site layout is shown on Drawing 003.

Wastes and products are then stored in allocated bays awaiting removal form site.

3.1 Permitted Activities

The waste management carried out are described and limited to those within the site permit.

3.1.1 Permitted Types and Quantities of Waste

150,000 Tonnes Per Year will be the permitted tonnage.

The list of requested permitted wastes is detailed within the NTS.

3.2 Waste Acceptance

3.2.1 Hours of Operation

The facility will be open to receive wastes and operate in line with the current planning permission.

The hours of operation at the site would be as follows:

- 07:00 to 18:00 Monday to Friday
- 07:00 to 14:00 Saturday

No operations shall take place on Sundays or on Bank or Public Holidays.

3.2.2 Load Inspection and Waste Control

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

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

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

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

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

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

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

A record will be kept in the site diary of all rejected wastes. The waste producer and the Environment Agency will be notified of significant non- conformance.

Waste acceptance procedures are included in the company Environmental Management System.

3.2.3 Means of Measurement

The quantity of waste accepted and despatched from the facility will be measured via the onsite use of the weighbridge.

All wastes entering the site will be recorded upon arrival and the waste and recyclable components removed from site for disposal for further recovery or reuse will also be recorded on exit.

3.3 Waste Storage

Maximum waste storage on site at any one time will be managed in accordance with the sites approved DEMP.

All wastes are stored on a concrete impermeable system, with a comprehensive internal drainage system installed throughout the permitted area.

The maximum storage capacity at any one time is 40,000 tonnes.

3.4 Waste Treatment

Wastes accepted at the site for processing will undergo one or a number of the following treatments prior to transfer offsite for further recovery.

The activities are specified in Annex I and Annex II of the Waste Framework Directive 2008 as follows:

- R13: Storage of wastes pending the operations numbered R3 and R5.
- R3: recycling or reclamation of organic substances which are not used as solvents.
- R5: Recycling or reclamation of other inorganic materials.

Treatment will be in the form of sorting, separation, screening, washing, crushing and blending of waste for recovery as a soil, soil substitute or aggregate.

3.5 Site Infrastructure and Equipment

3.5.1 Site Identification Board

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

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

The board will display the following information:

- Site name and address;
- Environmental Permit holders name;
- Operators name;
- Environmental Permit (Waste Management Licence) number;
- Emergency contact name and telephone number;
- Statement that the site is authorised by the Environment Agency;
- Environment Agency emergency national telephone and general number;
- Days and hours the site is open to receive waste.

3.5.2 Plant and Equipment

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

4.0 EMISSIONS AND MONITORING

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

4.0 Engineered Containment

Details of the proposed drainage layout at the Site are shown on Drawing 005. Use will be made of the existing drainage channels which will be modified to allow the creation of storm water storage lagoons.

These will be used to supply the mineral washing plant and reduce the demand on mains supply.

Suitable oil and silt traps will be installed around the proposed car park, office and workshop area. Consideration will be given to rainfall harvesting around the offices, workshop and warden's

bungalow. This *'grey water'* can then be used for washing down vehicles and as a supply for staff welfare facilities. Foul water will be managed using underground septic tanks that will be emptied as and when required.

Surface runoff from the mineral and waste processing area will be directed through one of two existing treatment lagoons. The second lagoon will be adapted and, if required, enlarged to provide storm water storage. This will be allowed to partly fill during storm events and pumped out through the settlement lagoon when weather conditions permit. Discharge flows will be controlled at the prescribed rate using a proprietary flow control mechanism.

The lagoons have been in place since 1979 and have continued to perform adequately throughout the operation of British Coal's storage,processing and rail loading facility and the development of UK Coal's surface mine when much greater demands were placed on their capacity.

Controls were previously set on the pH, suspended solids and iron content of the discharge water as part of the Environment Agency's consent. There will be no potential sources of acidity or iron oxides during the proposed development and the
principal contaminant is expected to be inert suspended solids (i.e. silt, sand and clay sized particles derived from the processing of primary and secondary aggregates).

Discharge flows from the area where additional restoration works will be carried out could be contaminated with suspended solids until such time that vegetative cover is established.

Sediment loads are unlikely to be excessive given to low surface gradients and the ability to retain material within the spreading areas by creating small banks of material and excavating temporary drainage channels and sumps.

The proposed freshwater lagoon will be used to remove any remaining material by settlement and provide attenuation capacity. A flow control mechanism will be provided on the discharge and it will be classified as a trade effluent until such time that the restoration works are completed.

Once vegetative cover is re-established it can be considered as natural drainage in common with other parts of the former Butterwell surface mine.

4.0.1 Containment Bunding

All potentially polluting materials for example oils and fuels will be stored in containers provided with secondary containment. Containers and secondary containment will be impermeable, resistant to the stored materials and constructed to the appropriate British Standard.

Containers will be surrounded by a leakage containment bund capable of containing at least 110% of the volume of the largest container within the bund or 25% of the total container volume within the bund, whichever is the greater.

Containers/Tanks will be inspected visually on a daily basis by the site staff to ensure the continued integrity of the containment and identify the requirement for any remedial action.

4.1 Odour

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

The procedure for managing complaints is detailed within the company Quality Environmental Management System.

The management of odour is detailed in Section Environmental Management System.

4.2 Dust

No waste consisting solely or mainly of dusts, powders or loose fibres will be accepted at the site.

The site has a Dust and Emissions Management plan to cover the acceptance, treatment and management of all wastes on site.

In the event the generation of dust occurs during storage or treatment of wastes, this will be monitored and mitigation methods will be employed to reduce the risk of fugitive dust emissions.

Daily site inspections will be carried out by site management and site staff during the course of their normal working activities.

The management of dust is detailed in Section 3.14 Environmental Management System and EA Approved DEMP.

4.3 Noise

Waste treatment operations will only be carried out during operational hours. All equipment will be maintained and operated in accordance with manufacturer's guidance and will be maintained in good working order.

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

- locating plant away from noise-sensitive receptors where possible;
- the avoidance of dropping materials from height;
- switching plant off when not in use;
- the imposition of a speed limit for vehicles delivering waste to the site. The site has 5mph Speed Limit This will reduce noise associated with high engine speeds;
- the training of all personnel in the need to minimise site noise, and will be responsible for monitoring and reporting excessive noise when carrying out their everyday roles;
- regularly maintaining site plant and machinery to minimise noise resulting from inefficient operation of pumps, generators and engines;
- in the event that reversing alarms are found to give rise to complaints, alternative alarms or technology will be investigated;
- the regular maintenance of site surfaces to prevent the development of potholes will significantly reduce the noise generated particularly by empty vehicles exiting the site;
- consideration will be given to the fitting of noise suppression kits on items of plant and equipment; and
- all plant will be maintained in accordance with manufacturer's recommendations to minimise noise emissions.

Any complaint received will be logged in the site diary. The Site Manager will investigate the complaint and will take action to identify the source of the noise and implement remedial measures where appropriate.

The measures employed at the site to minimise the emission of noise will be regularly reviewed by the Site Manager and additional measures will be employed where required.

The management of noise emissions is detailed further in Section 3.10 Environmental Management System.

4.4 Pests

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

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

Should the level of risk to pest, vermin or birds increase, the TCM will be responsible for implementing additional controls which may include;

• Clearing of waste bays (internal or external);

• Use of pesticides;

• Use of bait boxes / bait traps;

• Employment of specialist pest controllers.

In addition, the regular turnaround of waste materials and ongoing housekeeping / cleaning regime is currently in place.

A specialist pest control contractor will be deployed if required.

The management of pests is further detailed in Section 3.12 company Quality Environmental Management System.

4.5 Litter

Due to the nature of the waste to be accepted on site, it is not anticipated that litter will pose a serious risk.

The site is subject to ongoing inspections during operational times. Litter and debris will be cleared as required.

The predominant waste stream accepted by the site is mixed construction and demolition waste, which is tipped and processed within the main processing building. Any subsequent mixed waste from the process which could generate airborne litter is retained and loaded-out from within the processing building.

All other wastes are stored within designated bays, inclusive of bay walls, to minimise wind disturbance and possible generation of airborne litter.

Any litter which does escape the operation and is arrested by the site boundary fence will be removed at the end of the working day in which it is discovered.

In the event of any spillages of waste from the site boundary and into the local environment, it will be the responsibility of the TCM to arrange for litter picking of the affected areas within the same working day.

Any operation identified for the generation and escape of litter will be stopped, if required, until further measures can be taken.

In addition to the above, any outgoing wagons / trailer units and skips leaving the site when loaded with a waste material will be appropriately sealed / sheeted to prevent the escape of litter.

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

The management of litter is further detailed in Section 3.13 Environmental Management System.

4.6 Mud and Debris

It is therefore not expected that mud will feature as a problem for the site within the site, the following measures will be taken in order to prevent the deposition or tracking of mud or debris from the site onto public areas or highways:

- Good housekeeping practices are maintained at all times to ensure that the site is kept in a clean and tidy condition and to avoid the transport of mud and other detritus external to the site and surrounding areas.
- Vehicle access to the Site is directly from the road outside (West Line Industrial Estate) which is of tarmac construction.
- All vehicles are inspected for excess mud prior to leaving the site and, where necessary, cleaned off.
- The Site also makes use of an internal road cleaning service to ensure that the roads both on and off site remain clean.
- In the event that debris is generated from within the site it will be controlled by standard site management procedures, i.e. visual identification through the daily site inspection carried out by a competent person.

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

- the affected public areas outside the site will be cleaned; and
- traffic will be isolated from sources of mud and debris within the site to prevent further tracking of mud and debris, and measures will be taken to clear any such sources as soon as practicable.

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

The management of mud and debris is further detailed in Section 3.14 Management System.

5.0 INFORMATION

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

Records will be maintained for at least 3 years, however in the case of off-site environmental effects, and matters which affect the condition of land and groundwater the records shall be kept until permit surrender. Duty of Care records will be kept for a minimum of 2 years with hazardous consignment notes retained for 3 years or the lifetime of the permit.

5.1 Changes in Technically Competent Persons

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

5.2 Waste Types and Quantities

A summary report of waste types and quantities accepted and removed from the site for each quarter, will be submitted to the Environment Agency within 1 month of the end of the quarter unless otherwise required by the permit conditions.

5.3 Relevant Convictions

The Environment Agency will be notified of the following events:

- The company or directors being convicted of any relevant offence; and
- any appeal against a conviction for a relevant offence and the results of such an appeal.

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

The Environment Agency will be notified of the following:

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

5.5 Adverse Effects

The Agency will be notified without delay following the detection of the following:

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

5.6 Closure

Where the operator proposes to make a change in the nature or functioning, or an extension of the activities, which may have consequences for the environment and the change is not otherwise the subject of an application for approval under the Regulations or this permit:

- the Environment Agency shall be notified at least 14 days before making the change; and
- the notification shall contain a description of the proposed change in operation.
- The Environment Agency shall be given at least 14 days' notice before implementation of any part of the site closure plan.

6.0 Closure

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

This report is for the exclusive use of NB Clark Ltd; no warranties or guarantees are expressed or should be inferred by any third parties. This report may not be relied upon by other parties without written consent from Olive Compliance Ltd.

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