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# Cwrt Y Plyffin Waste Transfer Station Working Plan



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Pennorth  
Brecon  
Powys LD3 7EJ

Site Location:  
Cwrt Y Plyffin  
Llanwern  
Brecon

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## G Powell – Waste Transfer Station – Working Plan

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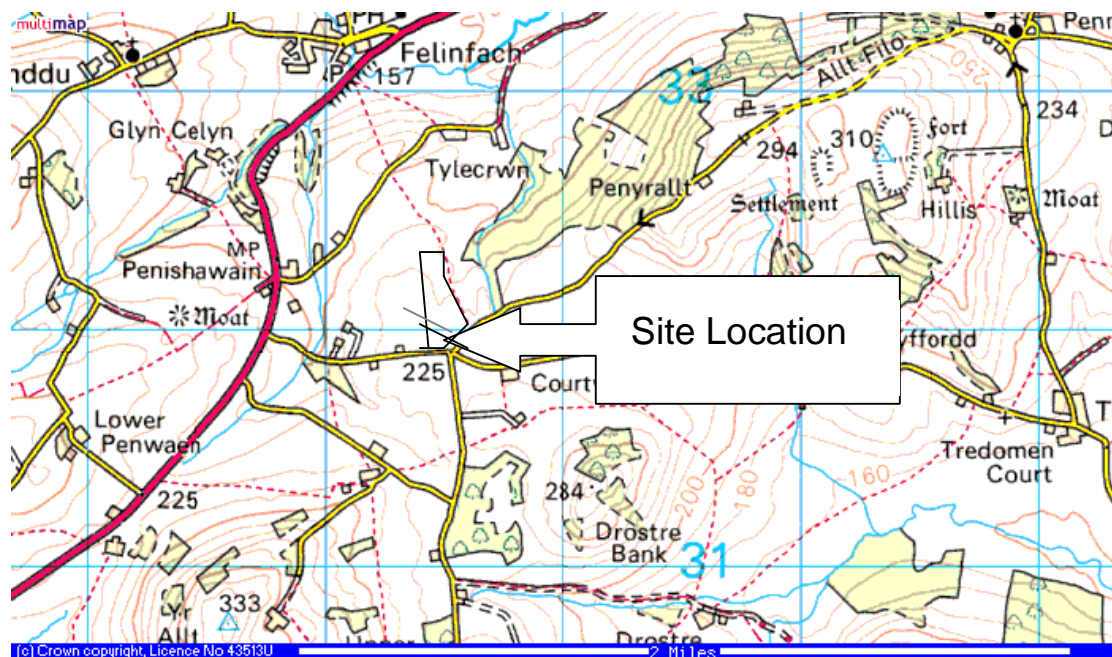
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## WP/1 Site description and characterisation of risk source

### WP/1.1 Specified site and waste management operations

#### Site Description and History

G Powell Waste Transfer Station (proposed) is located off a minor road at National Grid Reference 309400 231900 as shown in Plan WP/1.1. The site is situated at the south west corner of the Cwrt Y Plyffin Landfill (Site Licence No: BRE/50/2.94).



#### Plan WP/1.1 Site Location

The Cwrt Y Plyffin Landfill was originally developed under a Waste Disposal Licence in the mid 1980's (exact start date unknown) and was operated without a clear cell structure and as a result indiscriminate tipping occurred across much of the northern and eastern portions of the site. In 1994, upon the introduction of Waste Management Licensing, the Brecknock Waste Regulation Authority were reluctant to issue a Licence to the former operator who then withdrew from the site and responsibility was transferred to Mr G Powell, the current operator. A Waste Management Licence was subsequently issued in 1995 upon a Working Plan (1994 as amended) based on a clear cell structure. The site was allowed to accept for landfill disposal a maximum of 12,000 tonnes per annum at a maximum rate of 36 tonnes per day of inert materials (specified in the Licence) arising principally through the skip hire business operated by Powells Skip Hire. In addition the site was also permitted to accept no more than 5% of the total capacity up to a maximum of 35 tonnes per day of solid granular or broken materials which may

decompose slowly and are only slightly soluble in water (again specified in the Licence as including cardboard, paper, wood, plastics etc).

Since 1995, filling has been through means of piggyback disposal, on top of the waste deposited by the former operator, in a structured cell pattern. At the time of the issue of the 1995 Licence, only one area of the site was free of any landfilled waste, and this was in the south west corner, initially designated as Cell 8, although in a later Amendment to the Working Plan, the area was split into Cells 8 and 9 (Addendum April 1995 Report No: B002.Rep.04AD). Prior to any tipping in Cell 8, the operator was required to install a liner system to the satisfaction of the WRA. Since 1995, tipping has continued progressively across the eastern and northern portions of the site. The plan was then to progressively fill down the eastern portion to reach Cell 8/9 which would be filled last. However, with the introduction of PPC Permitting, the site would be commercially non-viable under such a permit and the decision was made to stop landfilling in order to progress to early restoration and completion. This means that Cell 8/9 has not been subject to any form of landfill disposal and remains as natural ground, apart from a small area of hardcore roadway and the installation of bunkers for bulking Powys County Council's glass for recycling (exempt activity), as shown on current site layout Plan WP/1.2 (attached) and Photograph WP/1.2.



**Photograph WP/1.2 Powys County Council's glass storage bays western side of Cell 8/9.**

The operator now plans to use Cell 8/9 as the location of a transfer station in order to allow recovery of materials, largely from his skip hire business, for recycling and for use as suitable inert engineering and soil cover materials from skip waste for the restoration of Cells 1-7. The restoration is subject to separate proposals made under the terms of the disposal Licence.

## **Waste Management Operations**

The waste management operations to be undertaken at the proposed transfer station are identified in Table WP/1.1

Specified Waste Management Operation	Limits on Specified Waste Management Operations
D15. Storage pending on this site any of the category 'D' operations authorised under this column, or elsewhere than on this site, any of the operations listed in Part III of Schedule 4 of the 1994 Regulations, (excluding temporary storage, pending collection, on the site where it is produced).	Maximum storage capacity 90 tonnes operational storage awaiting any of the authorised category D or R operations.
R13. Storage of waste consisting of materials intended for submission, on this site to any of the category 'R' operations authorised under this column, or elsewhere than on this site, to any of the operations listed in Part IV of Schedule 4 of the 1994 Regulations, (excluding temporary storage, pending collection, on the site where it is produced).	
D9. Physico-chemical treatment of waste not listed elsewhere in this Table which results in final compounds or mixtures which are disposed of on this site by means of any of the category 'D' operations authorised under this column, or elsewhere than on this site, by means of any of the operations listed in Part III of Schedule 4 of the 1994 Regulations. D13. Blending or mixture of waste prior to the waste being submitted to any of the operations numbered D1 to D12.	Treatment for disposal, recycling or reclamation consisting only of: <ul style="list-style-type: none"> <li>• Physical sorting or separation of waste into different components;</li> <li>• Grading and/or screening;</li> <li>• Compaction of waste.</li> </ul> Mixing of different wastes and waste types; blending, bulking, compaction. Maximum capacity 200 tonnes per day
D14. Repackaging of waste prior to waste being submitted on this site to any of the category 'D' operations authorised under this column, or elsewhere other than on this site, by means of any of the operations listed in Part III of the Schedule 4 of the 1994 Regulations.	Repackaging includes repackaging of the same waste types without sorting or mixing, including compaction and baling of the same waste types where the wastes are dry and the compaction does not give rise to any emissions or exudates from the waste.
R3 Recycling or reclamation of metals and metal compounds.	Maximum storage capacity 20 tonnes
R4. Recycling or reclamation of other inorganic materials.	

**Table WP/1.1 Permitted waste management operations**

**Specified Site**

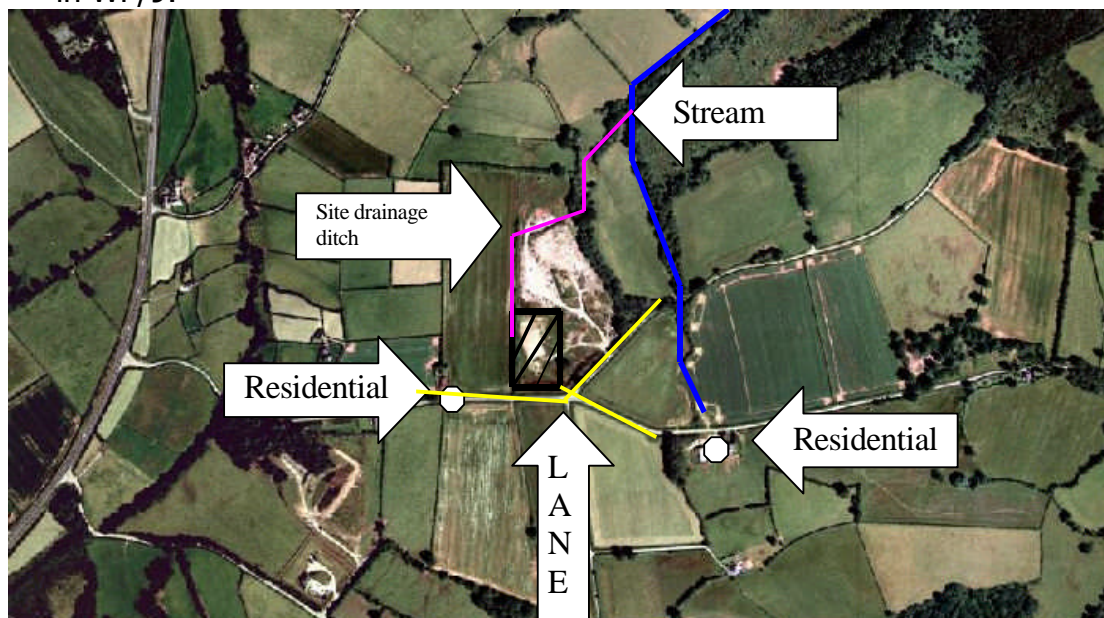
The specified site is that area of Cwrt Y Plyffin landfill site delineated on Plan WP/1.2.

The surrounding land uses and environmentally sensitive receptors are as follows:

- There are two residential properties situated in proximity to the site, the first being 150 metres to the west of the site boundary and the second being 250 metres to the south east. These receptors would be most sensitive to: litter, dust fallout and particulate burdens in air, strong odour, pests and scavengers and noise as a result of the operation of the transfer station.
- There is small stream that flows to the east of the site in a northerly direction and eventually joins the River Dulas 1000 metres north of the site. Surface water drainage from the site will flow along a shallow drainage ditch running along the western edge of the site, past the landfill to discharge via a culvetted pipe section into the stream. The River Dulas is generally of good quality and would be vulnerable to any polluting substances being discharged from the site via the surface water drainage system. The discharge of surface water will be subject to a consent to discharge under the Waste Resources Act 1991.
- The site is surrounded by open grazing fields on all sides and a small woodland some 500 metres to the north east. These receptors would be most sensitive to: litter, dust fallout and particulate burdens in air, pests and scavengers and noise.
- The local lanes could be sensitive to mud and debris accumulation.

The location of various receptors is shown in Photograph WP/1.1 at a scale of 1:10,000.

The site operator has undertaken risk assessments for the principal sources of hazard arising from the operations and these are summarised in WP/9.



**Photograph WP/1.1 showing locations of vulnerable receptors**

## **Location of Specified Waste Management Operations within the Site**

The area marked on Plan WP/1.2 shows the area of the site that will be used for the purposes of the Specified Waste Management Operations. In summary this consists of the access roadway leading from the site gate to the west across to the site's western boundary then northwards to the bund marking the edge of the former cell 8/9 then eastwards and south eastwards back to the site access gateway. This area will be delineated from the landfill by a suitable stock proof fence. Within the area at present, there is a stone access driveway and hardstanding that was constructed to allow access to glass storage bays erected on behalf of Powys County Council where they temporarily store recycled glass prior to shipping for recycling. The area has also been used for grading stone used in the construction of site roadways and soil used for capping of completed phases. There is also a small stockpile of chipped wood that is intended for use as mulch during restoration works.

It is intended that prior to commencement of waste transfer operations at the site, a suitably constructed concrete hardstanding is provided upon which the principal waste sorting operations will take place. Waste sorting will be through mechanical or hand sorting of skip waste either into separate dedicated skips for different recoverable fractions, into a general waste skip for transfer off-site for disposal elsewhere at a permitted facility, or for further recovery or recycling operations on-site. This will be serviced by a new surface water collection system, sediment trap, oil interceptor and discharge outfall to the site drainage ditch running along the western boundary. Once operations are established, it is also intended to construct a purpose built steel framed building that will be used for office accommodation together with hand sorting operations and storage of sorted waste that is prone to deterioration due to rainfall infiltration (e.g. cardboard and better quality wood waste). As a temporary measure, a site portable site cabin/container will be provided to allow for storage and completion of records and staff accommodation. A quarantine area will be provided consisting of a secure storage container with integral bunding. This will be used for temporary holding of any waste non-permitted wastes discovered in skip waste during sorting.

Alongside the concrete hardstanding will be provision for storage in stockpiles of sorted wastes awaiting either onward transfer from site, or further recovery operations on-site. The recovery operations will consist of:

- Crushing of oversize concrete, brick or tiles using a mobile crusher hired in as needed and separately permitted under the PPC Regulations 2000 Part B as an activity for the size reduction of bricks, tiles and concrete:.
- Screening mixed inert waste soil, demolition waste and other inert fractions to: recover suitable clean aggregate and fill materials for restoration of the landfill; fines for use in capping of the landfill and in manufacture of soil substitutes (under a separate exemption); or for any of these products for sale off-site.

- Chipping of timber to produce mulch and wood chip to be used in restoration of the landfill or for sale off-site (under a separate exemption)
- Other physical process, such as cutting, crushing, compaction or breaking designed to reduce in size or allow separation of fractions of recyclable or re-useable waste.

Other specified wastes that are suitable for recycling or recovery will be transferred off-site in suitable skips or containers for further processing at the Brecon Recycling Centre or otherwise or for disposal off-site either via the nearby Council Cwrt Y Plyffin Transfer Station (1/2 mile away) or suitably licensed facilities elsewhere.

### Waste types that will be subject to each waste management operation

The wastes submitted to each specified waste management operation are identified in Table WP/1.2.

Waste type Category 1	Permitted waste – EWC codes	Specified waste management operation
Inert construction wastes and similar wastes consisting of rock, stone, brick, tiles, concrete, ceramics or other inert material suitable as fill materials, cover or capping materials or for construction but excluding any materials liable to emit harmful dusts	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 08 02 gypsum-based construction materials other than those mentioned in 17 08 01	D9, D15 and R13 – sorting, storage prior to disposal or recycling/reclamation elsewhere other than on this site or crushing to reduce size of bricks, tile or concrete for recovery for use elsewhere (under a Part B permit using mobile size reduction plant).
<b>Category 2</b>		
Soil, soil and stones or other similar materials suitable for use in the manufacture of soil substitutes for use in landfill restoration or for other similar purposes	17 05 04 soil and stones other than those mentioned in 17 05 03 20 02 02 soil and stones	D9, D15 and R13 – sorting. Storage prior to disposal or recycling/reclamation elsewhere other than on this site or submission to screening prior to manufacture of soil substitutes under an exemption.
<b>Category 3</b>		
Discarded metals and equipment principally constructed from metals suitable for recycling off-site	15 01 04 metallic packaging 16 01 17 ferrous metal 16 01 18 non-ferrous metal 17 04 01 copper, bronze, brass 17 04 02 aluminium 17 04 03 lead 17 04 04 zinc	D9, D15 and R13 – sorting, storage prior to disposal or recycling/reclamation elsewhere other than on this site.

Waste type Category 1	Permitted waste – EWC codes	Specified waste management operation
	17 04 05 iron and steel 17 04 06 tin 17 04 07 mixed metals 17 04 11 cables other than those mentioned in 17 04 10 20 01 40 metals	
<b>Category 4</b>		
Wood and wood containing materials suitable for recovery or reuse or following chipping for use as mulch or wood chip based products	15 01 03 wooden packaging 17 02 01 wood 19 12 07 wood not containing dangerous substances 20 01 38 wood other than that mentioned in 20 01 37 20 03 07 bulky waste (comprising wooden furniture and fittings)	D9, D15 and R13 – sorting, storage prior to disposal or recycling/reclamation elsewhere other than on this site or chipping to produce wood chip or mulch on this site under an exemption.
<b>Category 5</b>		
Any of the above permitted wastes not suitable for recovery and other permitted waste not specified above	02 01 04 waste plastics (except packaging) 15 01 01 paper and cardboard packaging 15 01 02 plastic packaging 10 11 03 waste glass based fibrous materials 15 01 05 composite packaging 15 01 06 mixed packaging 15 01 07 glass packaging 15 01 09 textile packaging 16 01 03 end-of-life tyres 16 01 19 plastic 16 01 20 glass 16 02 14 discarded equipment other than those mentioned in 16 02 09 to 16 02 13 17 02 02 glass 17 02 03 plastic 17 03 02 bituminous mixtures other than those mentioned in 17 03 01 17 06 04 insulation materials other than those mentioned in 17 06 01 and 17 06 03 19 12 01 paper and cardboard 19 12 04 plastic 19 12 08 textiles 20 01 02 glass 20 01 39 plastics 20 01 99 other fractions not otherwise specified 20 02 01 biodegradable waste 20 02 03 other non-biodegradable wastes 20 03 01 municipal waste 20 03 07 bulky waste	D15 – Storage prior to disposal off-site at Cwrt Y Plyffin Transfer Station or elsewhere D14 – Repackaging prior to off- site disposal D9 – physical sorting to recover recyclable components prior to submitting to exempt activities on-site or off-site, or bulking/ compaction prior to disposal off-site. R2 R4

**Table WP/1.2 Waste types submitted to each waste management operation**

### Maximum Capacity of the Operation

The maximum capacity of the non-exempt activities covered by the Transfer Station Licence will be as follows:

- Maximum rate of deposit of waste at the site will be 100 tonnes in any one day.
- Maximum capacity of the site will be 24,000 tonnes per year

- The maximum storage capacity for waste received under any category 1-5 above but awaiting sorting in the holding area prior to submission to any of the D or R operations will be 90 tonnes at any one time (operational storage capacity).
- The maximum storage capacity of suitable inert materials in Category 1 that have been sorted and are now intended for crushing, screening or other physical treatment will be 500 tonnes.
- The maximum storage capacity for suitable fine inert waste materials in Category 2 that have been sorted and are now intended for screening, mixing or blending and/or other physical treatments to produce soils or soil substitutes will be 100 tonnes (under an exemption).
- The maximum storage capacity for metals in Category 3 that have been sorted and separated and are now intended for recycling or disposal elsewhere will be 15 tonnes.
- The maximum storage capacity for wood waste materials in category 4 that have been sorted and are now intended for reuse, recycling or reclamation or submission for chipping under an exemption will be 50 tonnes.
- The maximum storage capacity for wastes in Category 5 that have been sorted and packaged/bulked and are now intended for transfer off-site for disposal, recycling or recovery elsewhere will be 50 tonnes.
- The maximum sorting, screening and blending capacity of the operations will be 200 tonnes per day.

### ***WP/1.2 Permitted wastes***

The waste types to be accepted and dealt with at the site are as listed in Table WP/1.2

### ***WP/1.3 Hours of operation***

The maximum hours of opening of the site will be: 08.00 am to 18.00 pm Mondays to Fridays and 08.00 am to 13.00 pm on Saturday. Essential maintenance works may occasionally be carried out on Sundays between the hours of 08.00 am to 13.00 pm.

## **WP/2 Site Engineering for pollution prevention and control**

### ***WP/2.1 Engineered site containment and drainage systems***

The waste types dealt with at the site will be in solid form and generally be either inert or incapable of creating polluting liquids. The main risk arising at the site will be the potential that suspended solids in storm water runoff or in rainfall accumulation within a skip may pass via the site storm drains to enter the drainage ditch and hence into the stream and then the River Dulas.

There is also a small risk that a skip may contain a liquid waste, e.g. old oil can, which liberates oil when tipped onto the concrete sorting pad. This may under rainfall conditions also then lead to contamination of the stream and River Dulas.

The deposit of liquid wastes of any form in hire skips is clearly prohibited in the company contracts and during booking procedures, however experience has shown that this may sometimes occur. Therefore, the main control over oils and liquid wastes will be via waste acceptance procedures (refer to WP/3.4) designed to minimise the risk of such materials being present. Once waste is accepted at the site, tipping onto the concrete sorting pad will be closely supervised to ensure that any potentially polluting liquid matter is identified and wherever possible isolated and dealt with to avoid release onto the concrete pad. Isolated liquid waste items will then be transferred to the quarantine area for detailed assessment and removal for disposal off-site.

If any escape of potentially polluting liquids or heavy silt burden occurs during emptying of a skip or subsequent waste sorting, control of water pollution arising from the site will be through the site's drainage system which is designed to collect all surface water runoff from the impermeable area by means of a corner gulley leading to a silt trap and then through a standard Class 1 full retention Klargest petrol/oil and sediment interceptor. This will be sized to handle 50mm/hr rainfall on the impermeable surface area of 225 m<sup>2</sup> giving a peak discharge rate of 11.25 m<sup>3</sup> per hour. The drainage system will be constructed to high standards as set out in PPG3 and tested prior to commissioning. A separate discharge consent will be applied for to cover the rainfall dependent discharge from the impermeable area. The drainage system will be regularly maintained and inspected to ensure that it is in serviceable condition (Ref Procedure 5.2.1). Plans of the design of the impermeable waste sorting area and associated drainage system are attached as Plans. The design and supervision (CQA) of the construction works for the impermeable area and the associated drainage will be undertaken by the designated Engineer:

Mr P A Jones, BSc CEng MICE who is a consultant engineer based at 25 St Davids Crescent, Llanfaes, Brecon, LD3 8DP.

Mr Jones will submit a Validation Report to the Agency upon completion of the construction works.

Following the risk assessment, the impermeable concrete area and the surface water collection and drainage system has been designed and installed to ensure that:

- a) no liquid will run off the impermeable area other than via the system through side barriers (mortar jointed concrete kerbing, and an suitable effective fall on the concrete 1:40); and
- b) all liquids entering the system will be collected and passed through a sediment trap and then through a two stage interceptor with a suitable minimum retention time for final discharge to the site drainage ditch. The drainage ditch will re-profiled and planted with suitable native reeds to ensure further filtration and retention should the interceptor capacity be exceeded in extreme rainfall event;
- c) the drainage system is protected from damage by vehicles through its design and through the location of the interceptor away from any possible vehicle movements.

The secondary risk arising from the specified waste management operations is the escape of windblown dust or litter. There controls in place to prevent such escapes at the site are waste acceptance procedures (WP/3.4) to exclude any waste, which consists of large quantities of fine powders or loose fibres, and then control over the emplacement in skips and storage facilities. If weather conditions are such that there is a chance of material blowing from external skips, action will be taken to cover the affected skips with suitable and sufficient sheets or nets to contain the waste. During high wind conditions (>20 mph), any skip assessed to contain large proportions of lightweight materials, such as plastic film or paper, will not be tipped but will be held over until the wind speed drops. The waste screening operations may also potentially give rise to dust emissions during prolonged dry periods. The principal control to minimise risk from dust release will be to ensure that screening is only carried out at times of moderate to low wind velocity and wherever practicable using waste that has at least 10 - 15% moisture content. Water sprays will be used to control dust emissions during screening if required.

The inert waste, sub-soil and timber stockpiles will be protected from runoff of suspended solids by earth bunding erected along the edge of the drainage ditch. Therefore any fine materials escaping from the stockpiles will be removed by natural filtration prior to reaching the drainage ditch. The stockpiles will be situated on areas of hardstanding constructed using appropriate compacted aggregates.

## **WP/2.2 Site security**

The site is designed to prevent access by unauthorised persons or members of the public, livestock or large animals through robust fencing along the roadway and adjoining field, stock proof fencing separating the site from the

remaining tip area and locked gates preventing access at times when the site is unmanned. Due to the site's isolation and the fact that its use is restricted to Powells Skips, with no general access, illegal waste disposal or vandalism at the site or its immediate environ's has not proved to be problematical in the past.

The security arrangements in place at the site will be:

- Physical barriers around the periphery of the site comprising suitable and sufficient wooden and chain/wire fences and gates. Site access gates are steel and lockable out of hours.
- The waste quarantine store will be steel fabricated and lockable.
- All external stores provided for either valuable materials/wastes, or potentially polluting or hazardous wastes are designed to provide protection from unauthorized access, including adequate locks.

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## **WP/3 Site operations**

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### ***WP/3.1 Control of Mud and debris***

The site access to and from the site will be via a roadway consisting of coarse aggregate. This will be maintained to prevent potholes occurring. Vehicles entering the site will pass from the tarmac lane onto the site access roadway and will return via the same route. The only vehicles that will enter the tip site will be site vehicles, principally tracked excavators and tractors/trailers and exclude any vehicle carrying large quantities of soil and sub-soil, so mud is not envisaged that these will be required to leave the site directly via public roads. In the original working plan for the landfill, provision was made for a shaker bar to minimize mud on the lane, however due to the maintenance of adequate internal roadways, this has never proved to be necessary. Should any problems occur due to mud carry over onto the roadway, the shaker bar installation will be provided near the site entrance.

Debris blowing from either skips or from vehicles entering or leaving the site will be prevented or minimized by:

- Sheeting of any otherwise open loads where there may be risk of debris loss prior to transport from the site (Ref Procedure 2.2.4);
- Regular inspection and cleaning of skip haulage vehicles.

Reactive measures to identify and deal with any mud or debris that does occur on the site or the access roads are as follows:

- an appropriate inspection regime for adjacent roads and training of site operatives to recognize and report and debris or mud accumulation on access roads
- suitable cleansing of site roads by manual removal and vehicles by washing.

### ***WP/3.2 Potentially polluting leaks and spills***

The site will be operated to a high standard of control over leaks and spills reflecting the operators concern to provide a high quality site comparable with that operated at the Brecon Recycling Centre (also under control of the Mr and Mrs G Powell). This will include:

- high standards of housekeeping on the site;
- proper maintenance and monitoring of site surfaces, stores, skips and other storage or waste handling areas through a formal site storage facility inspection system according to written procedure (ref Procedures 2.2.2 and 5.1.1);
- checking and maintenance of drains and interceptors;
- effective action plans to control and minimise spills and leakages (Ref Procedures 2.2.4 and 12.1.1);
- physical handling and control of wastes to ensure that the risk of spills and minimised (Procedure 4.1.4);

- regular inspection of skips to ensure that they are free from defect and leaks with rapid repair of any identified leaks (Procedure 2.2.2);
- tipping/unloading in accordance with documented handling procedures (Ref Procedure 2.2.4);
- All waste stores will be clearly and unambiguously labelled to identify the contents.

### **WP/3.3 Fires on site**

Burning of waste will not be permitted on the site.

Fire prevention and control provisions will comprise the following measures:

- No bulk storage of highly flammable liquids will be permitted on the site, except the contents of vehicle fuel tanks.
- General good housekeeping to minimise accumulation of loose combustible wastes, such as cardboard or organic materials spilled during site operations.
- Staff training in fire prevention, fire detection, fire responses and evacuation procedures.
- Rapid response to isolate the drainage system with a 150 mm drain plug installed at the outfall to the interceptor in the event of fire to contain fire fighting water runoff.
- Storage of higher risk materials (plastics) in a dedicated skip sited on the concrete impermeable pavement.
- Provision of a suitable ABC type fire extinguisher.
- Recording and reporting fire incidents through the site management procedures, including notification to the Environment Agency (Ref Procedure 11.1.1)
- Maintaining an adequate environmental emergency plan (Procedure 12.1.1.)

### **WP/3.4 Waste acceptance and control procedures**

#### **Waste Acceptance/Control:**

The site will operate under the principle that a high level of supervision will be provided to minimise the risk that wastes not permitted to be deposited under the Licence will be allowed to be deposited in the site.

This will operate through four stages:

- Initial screening of skip bookings to ensure that the waste types to be deposited by the client are within the permitted types of waste and identify any special requirements, such as sheeting. Clear guidance is given on what can or cannot be placed in hire skips.
- Drivers are required to visually inspect a skips prior to lifting to check for the presence of wastes types not permitted under the contract with

the client. Any waste types identified to be outside of the permitted categories must be removed by the client before the skip is removed.

- Drivers check (where required) the waste description on the Duty of Care Transfer Note to ensure it matches the waste within the skip.
- Upon delivery to the site, waste will be emptied onto the impermeable concrete slab in a controlled manner and inspected to check for the presence of any non-permitted waste types. If the waste inspection shows the waste to be satisfactory, the waste will then be accepted for sorting. If any non-permitted wastes are identified, the load may be rejected completely and reloaded for return to the producer (if the producer can reasonably be identified), or if only small quantities are present and are not special waste, these will be manually removed (if this can be achieved safely) and placed in the quarantine facility awaiting detailed assessment prior to off-site disposal. The detection of non-permitted wastes and actions taken will be recorded in the site log book. The Environment Agency will be informed in any situation where non-permitted special wastes are discovered during acceptance or at a later time.

Where there is any doubt, the site operator will contact the Environment Agency to seek their advice before accepting any suspect type of waste at the facility. The information obtained for the person depositing the waste will be supplemented, where available, by any information contained on labels or technical specifications for the waste. This information will be used by the site operator to identify whether the waste can be legally accepted, the most appropriate storage facility and any special handling requirements that may be appropriate (including health and safety measures). (Ref Procedure 4.1.1)

Where any wastes appear to contain dry dusty or fibrous wastes, the acceptance procedure will include a check of windspeed. If windspeeds are >20 mph, the load will be held over in the holding area and will not be tipped onto the impermeable waste sorting slab until windspeeds have dropped.

Once accepted, the wastes will be subjected to the most appropriate form of sorting/recovery or disposal operation according to the characteristics of the sorted waste components.

Large prominent signage will indicate the types of waste that can be placed in each different storage facility.

### ***Waste Despatch***

All outgoing wastes for off-site disposal and all sorted/recovered wastes despatched from the site will be subjected to a documented and recorded visual inspection to confirm the description and characterisation of the waste. A Duty of Care Transfer Note and, where appropriate (for quarantined wastes), a Special Waste Consignment Note will be completed and signed by

an authorised employee of the operator at the time of consignment according to Procedures 4.1.6 and 4.1.7 as appropriate.

Inert engineering materials intended for restoration of the adjoining landfill will be subject to strict quality control checks under the restoration plan to ensure that they are suitable for use and free from contamination. This procedure will be agreed in writing with the Agency as part of the approval for the restoration plan.

### ***Segregation of Incompatible Wastes***

Clear procedures and facilities will be provided for ensuring that all wastes which would be incompatible are separately stored and segregated during recovery and transport (Ref Procedure 4.1.4). Due to the general low hazard nature of the waste categories permitted, it is unlikely that any chemical incompatibilities will occur. The main risk is physical incompatibility that renders waste unsuitable for recovery operations, such as presence of concrete in a pile of wood waste intended to chipping. Therefore, the operator will ensure that as far as is reasonably practicable, once sorted, wastes of different characteristics are stored in a manner that minimises risk of cross contamination, principally through clear demarcation of storage stockpiles and adequate separation distances.

### ***WP/3.5 Waste quantity measurement systems***

The operator has a weighbridge facility that is located at the Brecon Recycling Centre. However this facility is to be used as a public civic amenity site and access for lorries will be restricted to out of public opening hours to ensure a safe environment for the public. Therefore, the operator will record the quantity of skip waste delivered to the site using standard net weights for each skip size. Records are kept of each movement and these will be multiplied by the mean net weight of waste to produce the daily throughput. For any deliveries not in standard skips, these will either be held over and weighed at the Recycling centre's weighbridge or provided with a weighbridge ticket from a public weighbridge.

Waste leaving the site for disposal elsewhere will be weighed at the destination, such as the nearby Evan's Logistics transfer facility. Similarly, waste submitted for recycling/recovery off-site will also be weighed at the destination facility. Weighbridge tickets will be matched against Duty of Care Transfer Notes for each load consigned for off-site disposal, recycling or recovery.

Waste that has been assessed as meeting the specifications for engineering materials, and is required for the restoration of the adjoining landfill, will be quantified by a standard conversion factor for each trailer load. Records of each load moved to the landfill will be kept in order to comply with the Duty of Care requirements.

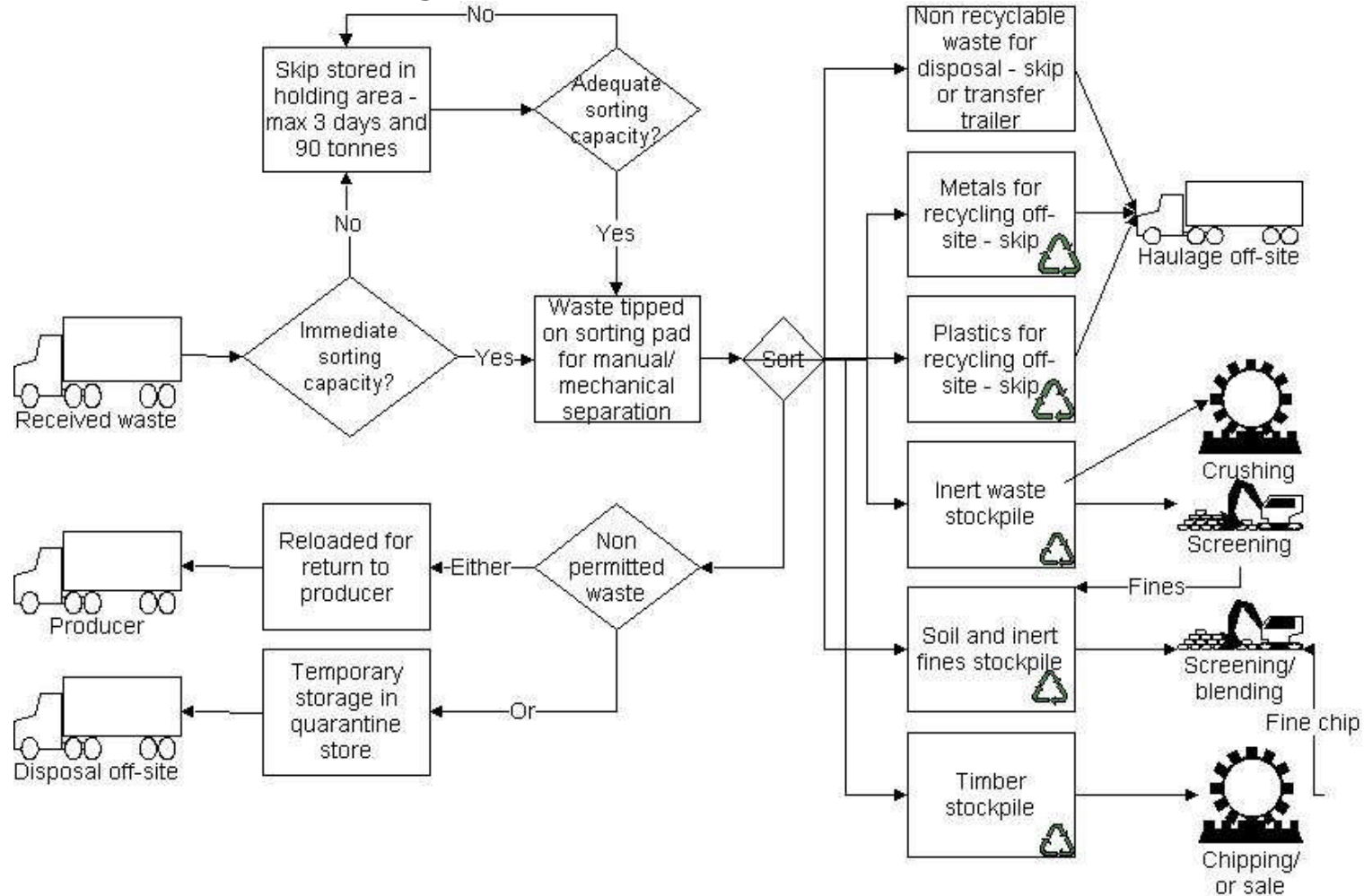
### **WP/3.6 Storage of specified wastes**

Waste storage arrangements for specified waste are summarised in Figure WP/3.1.

The storage facilities/methods to be used are:

- Incoming waste in skips placed on holding area if required with maximum capacity of 90 tonnes (approximately 20 skips) for a maximum of 3 days, normally following public holidays when the site will be operating at maximum sorting capacity.
- Non-permitted waste stored in metal, lockable container with integral bunding awaiting consignment for disposal.
- Sorted metals stored in robust skip(s) awaiting recycling off-site.
- Sorted plastics and other recyclable wastes stored in secure skips awaiting recycling/recovery off-site (under an exemption under para. 18(1)) situated on the concrete impermeable hardstanding at all times in case of fire to contain firewaters.
- Non-recyclable waste stored in skips or a transfer trailer (depending of volumes arising) awaiting consignment for disposal or recovery off-site.
- Timber suitable for chipping or sale for reuse will be stored in a stockpile awaiting chipping (under an exemption under para. 21(1) and 21(2)) or off-site sale for reuse, recycling or recovery.
- Sub-soil and inert fines suitable for manufacture of soil substitutes will be stored in a stockpile awaiting screening and/or blending. The soil substitute manufacture will involve blending the inert fines with either fine wood chippings or compost (produced elsewhere) and will be undertaken under an exemption under para. 13(2). The finished product will be used either for capping the adjoining landfill, or for sale off-site as appropriate.
- Inert concrete, bricks and tiles will be sorted or screened to separate out oversize materials and fines. The oversize materials will be stockpiled awaiting crushing using mobile plant under exemption conferred by para 24(1). The fines will be transferred to the sub-soil/fines stockpile above and the aggregate grade will be either used in restoration of the adjoining tip as engineering materials or sold off-site.

Figure WP/3.1 Waste flow and storage facilities



### **WP/3.7 Specified waste treatment processes – plant, equipment and processes**

The overall waste flow showing how waste will be dealt with at the site is shown in Figure WP/1.1 above.

Waste processing for specified wastes will be confined to:

- Physical sorting by-hand or mechanical plant (excavators equipped with claw grabs or similar) with sorted waste being placed into appropriate skips or stockpiles. No site personnel will be allowed to physically climb into a skip once waste has been deposited within it. All sorting to be undertaken on the impermeable concrete slab consisting of 150 mm concrete with integral kerbing and a 200 mm thick push wall 4.0m long reinforced with B785 fabric reinforcement sufficient to take a 5 tonne horizontal load applied 1m above the slab. The concrete slab will include A393 fabric thickened to 200mm as a base for the push wall. The push wall will be used for removal of fines using plant equipped with front acting bucket.
- It is not planned to use direct physical compaction for waste in skips, other than the weight of the waste and occasional physical levelling using a mechanical excavator bucket. No exudates are expected due to the fact that compaction will within a sealed skip.
- Screening of soil, fines, demolition and construction rubble and other suitable inert materials using a mobile screen Photograph WP/3.1. The waste to be screened will be fed into the screen using a mechanical excavator.
- Chipping of waste wood using a mobile shredder/chipper fitted with feed belt. This will be loaded either by hand or mechanical plant. (exempt activity)
- Crushing of oversize bricks, tiles and concrete as required using mobile plant (contracted in) (exempt activity but subject to a Part B permit).
- Blending/mixing of fines and chipped/shredded wood/compost using mechanical plant to produce a soil substitute (exempt activity).
- Miscellaneous cutting, sawing, breaking etc of large items to facilitate their subsequent handling using appropriate equipment as required.



**Photograph WP/3.1 Mobile Screen**

## **WP/4 Pollution control, monitoring and reporting**

### ***WP/4.1 Monitoring of meteorological conditions***

The site specific risk assessment has indicated that due to the exposed nature of the site, there is a slight risk of dust and litter being blown from the site during high wind conditions. Dusty operations, such as screening dry inert fines, and operations likely to release litter (principally tipping wastes containing high proportions of plastics film) will not be undertaken in high windspeed conditions (>20 mph). It is not proposed to provide permanent fixed on-site windspeed measurement during the first few months of operation. Instead, forecast windspeeds will be checked from the Met Office website whenever weather conditions appear such as to represent a risk of high wind conditions. Once the site is fully established, a battery powered anemometer and LCD display system will be fixed permanently at the site.

### ***WP/4.2 Monitoring and reporting gases and aerosols other than landfill gas***

It is not envisaged that the types and quantities of wastes accepted at the site will give rise to any significant risk of aerosols, gases and vapours that will be likely to cause nuisance or risks to health or the environment. Notwithstanding this assessment, the site operator will maintain a system of regular inspections of the site and its immediate environment to detect whether there are any observable releases or impacts to the wider environment so that appropriate action can be taken and the necessary reports and records required under the Site Licence initiated.

The procedure for site assessment is detailed in Procedure 9.1.2. and Form 9.1.2. Records of assessments will be held on file.

### ***WP/4.3 Surface water monitoring and reporting***

The risk assessment has indicated that because site drainage is to the drainage ditch and eventually the River via the stream, it is important that high levels of control are used to prevent polluting matter entering the stream. Regular visual inspections of the sediment trap, interceptor chambers and outfall will be required in order to give early warning of potential releases to the site drainage ditch. Procedure 5.2.1 will apply in addition to any requirements that may be imposed under the Consent to Discharge that will be required before operations commence. The site operator will ensure that regular visual checks on the quality of the discharge from the interceptor into the site drainage ditch are undertaken to detect any release of polluting matter. If any pollution event is identified, immediate action will be taken to construct a temporary dam across the ditch and the Environment Agency will be informed.

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## **WP/5      Amenity management & monitoring**

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### ***WP/5.1      Control, monitoring and reporting dusts, fibres and particulates***

The control of dusts, fibres and particulates will largely rest upon the measures detailed elsewhere (WP/2.1, WP/3.4). These measures will be adequate to control risk of such releases occurring. Based on the nature and quantities of wastes to be handled at the site, no specific atmospheric monitoring, other than general visual observations, are proposed.

### ***WP/5.2      Control of odour and noise nuisance***

Due to the nature of the waste to be accepted (largely inert or low activity waste), the relatively small quantities of wastes to be dealt with, and the isolation of the site from sensitive receptors, odour nuisance is not expected to be a risk at the site.

The control of any residual risk will be by regular olfactory assessment of conditions at the site and its immediate environs and the specified response actions as specified in the Site Licence.

The site specific risk assessment has confirmed that the likelihood of noise nuisance to the nearest vulnerable receptors (residential properties at 150 m west and 250 metre south east of the site) is low. Based on experience in operating the adjoining landfill since 1994, the attenuation distance is such that no noise nuisance has been reported during this period. The basic waste discharge, loading, sorting and movement around the site is likely to emit less noise than is emitted from the tracked bulldozer used on the landfill and is unlikely to give rise to complaint. Periodic use of crushing plant may however pose a possible source of noise complaint and therefore prior to such machinery being contracted into site, a specific noise assessment will be requested from the contractor taking into account the principles established by British Standard 5228 Code of practice on control of noise from construction and open sites.

### ***WP/5.3      Control of pest infestations***

Control of pest infestations will be by the measures specified in the Site Licence. If any pest infestations are detected, a professional pest control contractor will be commissioned to eradicate such pests. Because of the risk that persistent pesticides may escape to contaminate the site surface water drainage system a specific approvals procedure for pesticide use will be followed before the contractor is allowed to use any form of soluble or dust based pesticide (Ref Procedure 9.2.1).

### ***WP/5.4      Control of scavenging birds and other scavengers***

Due to the nature of wastes to be accepted at the site, the quantities involved and the method of storage and handling, scavenging birds and animals are

not expected to be a significant risk at the site. The requirements specified in the Site Licence are considered adequate to identify and control any particular problems that may arise.

### ***WP/5.5 Control of litter***

Due to the nature of wastes to be accepted at the site, the quantities involved and the method of storage in skips and other containers, litter is not expected to be a significant risk at the site. However, in high wind conditions there is slight risk that loose lightweight materials, such as plastic sheeting may be blown away during tipping of skips on the impermeable sorting pad.

Therefore, during high wind conditions, loads containing such items will be held over in the holding area until weather conditions improve. Under such conditions netting may also be required on skips containing any lightweight materials.

Under the Site Licence for the Landfill, the operator is required to inspect for and remove any windblown litter. The procedures in place for the landfill will be adequate to deal with any escapes arising from the transfer station. The site operator will undertake regular visual inspections of the site and its environs to identify any localised problems that may occur (Ref Procedure 9.1.2).

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## **WP6 Site records**

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### ***WP/6.1 Security and availability of records.***

The operator will provide a secure steel shipping container to act as temporary site office, until such time as a more permanent building can be erected at the site. The daily records relating to site diary, records of quarantined wastes, and inspections will be stored within the container. From past experience, records held on site are unlikely to be fully secure and may suffer from inadequate storage conditions giving rise to deterioration. Therefore, at frequent intervals, site records will be removed for safe storage and analysis to Brecon Recycling Centre, some 5 miles away, where there will be access to computer records of the information and documents may be inspected by the Agency.

Duty of Care Transfer Notes, Weighbridge Tickets for waste removed from or delivered to the site, records of loads transferred for restoration of the adjoining landfill, site inspections records, records of maintenance, emergency responses etc will all be kept in paper form in files at the Brecon Recycling Centre. Some of the records may also be entered into computer based record keeping systems, as justified, to aid statistical analysis.

### ***WP/6.2 Records of waste movements***

The procedures to be followed in respect of recording the quantities and number of movements of waste from the site are as detailed in WP/3.4. Regular reports on waste movements from the site will be submitted to the Agency according to licence requirements for reporting.

## **WP/7      Operational Procedures**

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Date: Draft

**Procedure Reference: 1.1.1**

**Title: Monitoring Third Party Compliance with Site Policy and Licence Conditions**

**Related Procedures:**

- 1.1.3 Communication of Environmental Policy
- 11.1.1 Recording and Reporting of Environmental Incidents

**Summary:**

Monitoring and recording the activities of Third Parties to ensure that they comply with relevant Site Procedures and Policy and Site Licence Conditions. Third parties who may be relevant may include:

- Contractors
- Haulage contractors/waste carriers

**Procedure**

1. All contractors, visitors or other relevant third parties should be appropriately briefed on the contents of the Site Policies and Procedures and Site Licence Conditions, particularly those that may affect them or their activities directly.
2. All third parties present at the site should be closely supervised at all times.
3. Contractors and other third parties who are unlikely to be engaged in activities which have the potential to create environmental risks should be made aware of any specific activities (such as smoking, handling polluting liquids or using or transferring hazardous substances) which they must not engage in prior to their access to controlled areas of the site.
4. All contractors or any other third party must be subject to the following requirements 5 - 8.

**Contractors**

5. Where contractors are required to submit tender documents, the environmental aspects must be explained in any specifications that are issued prior to award of contracts. Tender submissions must be assessed by the manager responsible for the contract to determine whether the contractors have taken due account of these aspects in their proposals. Where necessary, contract conditions should specify the exact requirements and any sanctions/penalties that will apply should the contractor fail to meet them.
6. Prior to commencing work on site, contractors must be briefed on any specific procedures that they will be required to follow. In particular, requirements applying to: handling and storage of environmentally hazardous substances; disposal of any wastes and liquid effluents; safe systems of work and permits to work; and emergency actions in the event of an environmental incident must be made clear.

7. The designated person responsible for supervising the work of contractors should undertake regular inspections to assess compliance with the Site Policy, related procedures and specific Site Licence conditions.
8. Failures to adhere to requirements or associated procedures must be treated as an Environmental Incident. The person responsible for supervising the contractor must inform the site operator of the incident using the Environmental Incident Report procedure which specifies how and when the reports should be made (refer to Procedure 11.1.1).

Date: Draft

**Procedure Reference: 2.1.1**

**Title: Assessment of Supplies and Raw Materials**

**Related Procedures:**

**Summary:**

All supplies and raw materials must be subject to an assessment to determine whether there are any significant environmental implications associated with their use.

**Procedure**

1. All incoming substances must be subject to an assessment of environmental effects associated with their use. This assessment must be conducted prior to use of new supplies or materials. Existing supplies and materials must be subject to reassessment at appropriate intervals. Should any specific regulations be introduced or other factors affecting the use of supplies or materials change, a reassessment should be made to determine the consequences for further use.
2. Substances will be subject to assessment through the procedures relating to the Control of Substances Hazardous to Health Regulations 2002. The actions taken in response to assessment of supplies and raw materials conducted under Procedure 2.1.1 must not conflict with any health and safety requirements.
3. The nominated person purchasing the material or item must conduct an assessment of the proposed purchase to identify whether any of the following issues may be relevant:
  - material or supplied item is prohibited from purchase or use under Site Policy
  - specific environmental hazards associated with the storage or handling of the material or item including potential for air, water, land, noise pollution, aesthetic effects or nuisance
  - specific environmental hazards associated with the disposal of the supplied item or material or packaging either as waste or effluent
  - environmental impacts associated with the supplied item or material in the event of foreseeable accidents such as fire, flooding or other unplanned event.
  - use of the material or supplied item would require specific regulatory permission or notification including authorisations, permits, licences etc
  - environmental impacts associated with the production of the item or material prior to supply to the Site, including use of non-renewable resources, use of substances known to damage the ozone layer, use of environmentally hazardous substances which have less damaging alternatives
  - energy use and efficiency for appliances, machinery etc
  - substances for which use is banned or subject to phase-out under legislation or international conventions.
4. For some substances, relevant information will be provided by the supplier in the form of Materials Safety Data Sheets prepared under the Chemicals (Hazard Information and Packaging for Supply) Regulations 1999 as amended and other similar regulations. This may include reference to composition, health hazards and specific risks, emergency

procedures, waste disposal requirements and other specific environmental hazards. For other substances and supplied items relevant information may be available from product descriptions, labels and brochures. Where such sources of information are not adequate, specific enquiries should be made with the manufacturer or supplier.

5. If the assessment is straightforward and easily repeated, and no significant environmental issues are identified, the assessment need not be recorded. Where significant environmental issues are identified or suspected, the assessment must be recorded on Form 2.1.1.
6. The outcome of the assessment must be communicated to all persons who may be affected. Where specific procedures or requirements are applicable, these should also be communicated and appropriate training given to all those affected.

**Form 2.1.1**

**Supplied Material or Item Assessment**

**Reference: Procedure 2.1.1**

**SECTION 1**

**Material/Substance/Item Name**

**Supplier/Manufacturer**

**Nature/State**

**Purpose for which the material or item is required**

**Quantities Required over next 12 months**

**Sources of information**

**Materials Safety Data Sheet  
Product Brochure**

**Packaging Label  
Supplier Enquiry**

**SECTION 2**

**QUESTION 1.....**

**Does the material or supplied item contain any components or substances which are or are likely to be prohibited or restricted by law or by the COMPANY Environmental Policy?  
YES/NO**

**If NO, go to QUESTION 4  
If YES, go to QUESTION 2**

**QUESTION 2.....**

**Is the use of the material or supplied item essential? YES/NO**

**If NO, recommend discontinuing use in RECOMMENDATIONS (Section 3).  
If YES, go to QUESTION 3**

**QUESTION 3.....**

**Can any actions be taken to ensure that the material or supplied item can be used without unacceptable environmental effects? YES/NO**

If NO, recommend discontinuing use or full study of alternatives in RECOMMENDATIONS (Section 3).

If YES, recommend the actions that should be taken in RECOMMENDATIONS (Section 3) then go to QUESTION 4

**QUESTION 4.....**

Does the material or supplied item contain any substances which may cause significant emissions to atmosphere, water or land, noise, aesthetic effects or nuisance under normal circumstances of use, storage or handling? YES/NO

If NO, go to QUESTION 7

If YES, list these effects below and then go to QUESTION 5

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**QUESTION 5.....**

Can any measures be taken to minimise these effects so that normal use would be acceptable? YES/NO

If YES, list these measures in RECOMMENDATIONS (Section 3) then go to QUESTION 7

If NO, go to QUESTION 6

**QUESTION 6.....**

Is the use of the supplied item or material essential? YES/NO

If NO, recommend discontinuing use in RECOMMENDATIONS (Section 3).

If YES, recommend full study of alternatives in RECOMMENDATIONS (Section 3) then go to QUESTION 7

**QUESTION 7.....**

Is use of the supplied item or material or disposal of its packaging likely to result in any wastes or effluents? YES/NO

If NO, go to QUESTION 10

IF YES, list these wastes or effluents below and then go to QUESTION 8

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**QUESTION 8.....**

Can the effluent or waste be discharged or disposed of legally and in an environmentally acceptable manner? YES/NO

If NO, recommend discontinuing use in RECOMMENDATIONS (Section 3)

If YES, go to QUESTION 9

**QUESTION 9.....**

Are there any environmentally hazardous properties to the waste or effluent which would require specific precautions to be taken during disposal or discharge? Examples would include Special Wastes, Difficult Wastes, effluents to sewer or 'controlled waters' which contain UK Red List substances? YES/NO

If NO, go to **QUESTION 10**

If YES, list the precautions in RECOMMENDATIONS (Section 3) then go to **QUESTION 10**

**QUESTION 10.....**

Is the use of the supplied item or material in the quantities given above likely to require any specific regulatory permissions, authorisations, permits, licences etc? YES/NO

If NO, go to **QUESTION 11**

If YES, list the requirements in RECOMMENDATIONS, then go to **QUESTION 11**

**QUESTION 11.....**

Is the supplied item or material likely to cause environmental pollution in the event of foreseeable accidents such as fire, spillage, leaks, flooding or other unplanned event? YES/NO

If NO, go to **QUESTION 13**

If YES, list these potential consequences below and then go to **QUESTION 12**

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**QUESTION 12.....**

Can any practicable measures be taken to minimise the risks of environmental pollution in the event of foreseeable accidents? YES/NO

If YES, list these measures in RECOMMENDATIONS (Section 3) then go to **QUESTION 13.**

If NO, RECOMMEND that a review of storage and handling procedures be undertaken to ensure risks of accidents are minimised then go to **QUESTION 13.**

**QUESTION 13.....**

Are there any other relevant issues which should be taken into account in existing or planned use of the supplied item or material? Examples may include energy use or efficiency, use of non-renewable resources in its manufacture etc? YES/NO

If NO, complete **SECTION 4.**

If YES, list these issues below and list any actions required in RECOMMENDATIONS (Section 3) then go to **SECTION 4.**

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**SECTION 3 RECOMMENDATIONS**

Use this section to list all recommended actions arising from the assessment undertaken in SECTION 2.

Recommendation Priority 1 / 2 / 3

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Person Responsible	
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Date completed	
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Recommendation Priority 1 / 2 / 3

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Person Responsible	
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Date completed	
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**SECTION 4**

Date of assessment	
Date for reassessment (not greater than 12 months)	
Person completing this assessment	
Signature	

Date: Draft

## **Procedure Reference: 2.2.1**

**Title: Design of Waste Storage Facilities**

### **Related Procedures:**

- 2.2.2 Inspection and Testing of Waste Storage Facilities
- 2.2.3 Emergency Action in the Event of Spills or Leaks from Waste Storage Facilities
- 2.2.4 Loading and Unloading of Environmentally Hazardous Substances

### **Summary**

All storage facilities for waste substances or materials which are environmentally hazardous must be designed to be

- appropriate to the nature of the substances involved
- manufactured and constructed from suitable materials
- constructed to appropriate standards
- designed to isolate leaks and spills
- marked with appropriate warning symbols and text
- located in an appropriate position.

### **Procedure**

#### **Existing Storage Facilities**

1. The site operator is responsible for identifying and assessing the suitability of all materials storage facilities that are used for storing waste materials.
2. Storage facilities must be inspected to determine whether they are
  - manufactured from suitable materials which will not be degraded by the materials in store or other substances that may be present in the area
  - constructed to appropriate standards which may include regulations, Codes of Practice, site licence conditions etc
  - designed to isolate or contain leaks and spills
  - marked with appropriate warning symbols and text which meet legal requirements
  - in good condition and adequate for their purpose
  - located in suitable areas.

The inspection should be recorded according to Procedure 2.2.2. Re-inspections should be undertaken regularly.

3. Where defects or sub-standard storage is identified, the actions required should be

documented using Procedure 2.2.2.

### **New Storage Facilities**

4. All new facilities for materials storage will be designed to meet the criteria listed in 2. above.

Date: Draft

## **Procedure Reference: 2.2.2**

### **Title: Inspection and Testing of Storage Facilities**

#### **Related Procedures:**

- 2.2.1 Design of Waste Storage Facilities
- 2.2.3 Emergency Action in the Event of Spills or Leaks from Waste Storage Facilities
- 2.2.4 Loading and Unloading of Environmentally Hazardous Substances

#### **Summary:**

All storage facilities for substances or materials that are environmentally hazardous must be regularly inspected and tested.

#### **Procedure**

1. All facilities used for storage of environmentally hazardous waste and other materials must be regularly inspected and tested to ensure that they are fit for purpose and free from defect.
2. The site operator must ensure that an inventory or register of storage facilities is maintained which specifies the following, where appropriate:
  - reference number/ description
  - design criteria and construction details including, where appropriate civil details, manufacturer's drawings, design standards, materials specifications, capacity, maximum loading/capacity etc.
  - the authorised uses/contents
  - any modifications to original design concept
  - inspection schedules and test parameters, including examinations under the PUWER and LOLER regulations
  - history, including inspections and any maintenance work carried out
  - details of any incidents.
3. The site operator is responsible for determining the frequency and nature of visual examinations, in-service examinations, and detailed examinations for each storage facility.

#### **Examinations**

4. Storage facilities must be regularly inspected to determine whether there is any sign of damage, corrosion, deterioration, incident, leakage or spillage. For most storage facilities at the site, a weekly visual inspection would be normal. Checks on materials in storage should be made to check that they are materials authorised to be stored at the facility. The results of visual inspections must be recorded on Form 2.2.2.

### **Corrective Actions**

7. Where defects or other abnormalities are identified as a result of inspection or tests of storage facilities, records must be maintained of all corrective actions taken. The site operator must ensure that all corrective actions are recorded on the storage facility inventory/register.

**Form 2.2.2**

**Storage Facility Visual Inspection**

Reference: Procedure 2.2.2

Storage Facilities (identify each examined).....

.....

.....  
For all storage facilities included in the storage facility inventory/register, are the following satisfactory.

		Condition	Corrective Action Required
1	Emergency equipment		
2	Personal protective equipment		
3	Lifting points, lugs etc		
4	Vents, caps etc		
5	Civil works including impermeable base around facility		
6	Structures, shells, flanges, valves		
7	Rain water accumulation		
8	Labels, signs, warning notices		
9	Level, contents or parameter indicators		
10	Alarms, warning devices		
11	Free from leaks or spills		
12	Correct materials in store		
13	Free from incompatibility risks		
14	Documentary records		
15	Security provisions		
20	Other aspects		

Date of inspection

Person undertaking inspection

Signature


All corrective actions identified during the inspection must be recorded in the storage facility inventory/register.

Date: Draft

**Procedure Reference: 2.2.3**

**Title: Emergency Action in the Event of Spills or Leaks from Waste Storage Facilities**

**Related Procedures:**

- 2.2.1 Design of Waste Storage Facilities
- 2.2.2 Inspection and Testing of Waste Storage Facilities
- 2.2.4 Loading and Unloading of Environmentally Hazardous Substances
- 12.1.1 Environmental Emergency Plan

**Summary:**

Emergency action procedures must be prepared for all waste storage facilities containing environmentally hazardous substances.

**Procedure**

1. Emergency action procedures must be prepared for all facilities used for storage of environmentally hazardous materials.
2. The Environment Manager is responsible for ensuring that suitable emergency action procedures are prepared for storage facilities and that these are kept up-to-date. These procedures must cover as a minimum the actions that should be taken in the event of major and minor spills and leaks and should comply with guidance contained in PPG 21.
3. Copies of these procedures must be available on site in the cabin. In some circumstances, copies of emergency procedures must be made available to the emergency services and appropriate enforcing authorities as required by regulations (refer to Procedure 12.1.1).
4. All personnel employed in dealing with the waste storage facility and any other employees who may be involved in emergency actions must be trained in the procedures, with refresher training being given at appropriate intervals. Records of all training given must be maintained on personnel records.
5. Where appropriate, exercises should be undertaken to test the emergency procedures. Exercises should be designed to test the sufficiency of the procedures in a range of different situations. Where necessary, procedures must be revised to take account of the findings from exercises.

Date: Draft

**Procedure Reference: 2.2.4**

**Title: Loading and Unloading of Environmentally Hazardous Substances**

**Related Procedures:**

- 2.2.1 Design of Waste Storage Facilities
- 2.2.2 Inspection and Testing of Waste Storage Facilities
- 2.2.3 Emergency Action in the Event of Spills or Leaks from Waste Storage Facilities
- 4.1.8 Waste - Transportation in Company Controlled Vehicles
- 8.1.1 Systems of Work
- 12.1.1 Environmental Emergency Plan

**Summary:**

Safe systems of work must be implemented for all loading and unloading operations involving substances or materials which are hazardous to the environment.

**Procedure**

1. Safe systems of work must be designed and implemented for all loading and unloading operations involving environmentally hazardous substances or materials (refer to Procedure 8.1.1). The nature of waste accepted at the site means that the environmental risk arising from most materials will be small, with the exception of dry dusty materials which have potential to emit dust releases in high wind conditions and wastes containing significant quantities of loose light materials which may cause litter to blow from the site. Despatch of liquid waste (emptying of site interceptor) also has the potential to cause water pollution.
2. The site operator is responsible for ensuring that suitable instructions and systems are prepared and implemented for all loading and unloading operations involving environmentally hazardous substances or materials and that these are kept up-to-date. They must cover as a minimum the following requirements (where appropriate):
  - nature of the waste substance
  - quantities involved
  - the risk to safety and the environment
  - warning notices placed and access to the loading/unloading area restricted
  - spill containment measures and other precautions including sheeting for loads liable to give rise to debris

- check of windspeed for tipping or handling dusty waste
  - use of personal protective equipment by the operators
  - provision of emergency equipment
  - supervision requirements
  - responsibilities of operators and drivers
  - pre-loading/pre-unloading authorisation requirements
  - prevention of movement of vehicles in the vicinity
  - testing of connections where flexible connections are made
  - checks that the ullage in storage vessels or road transportation is sufficient to accommodate safely the full load
  - personnel are authorised to operate and supervise loading and unloading operations
  - detection of completion and immediate disconnection of all hoses
  - checks to ensure that, where required, warning labels, placards and other warning symbols are on contents and vehicles and that TREM cards are carried in the vehicle and are correct for the load concerned
  - sign-off procedures when the operation is complete
  - reference to the action to be taken in the event of spillage, leaks or other emergencies should also be included in the loading/unloading procedures (Refer to Procedures 2.2.3 and 12.1.1).
3. Copies of these procedures must be available at or near to the loading/unloading area concerned.
  4. All personnel employed in the operations and any other employees who may be involved in emergency actions must be trained in the procedures, with refresher training being given at appropriate intervals.
  5. Records of all training given must be maintained on personnel records.
  6. Where appropriate, exercises should be undertaken to test the loading/unloading procedures prior to implementation. Exercises should be designed to test the sufficiency of the procedures in a range of different situations. Where necessary, procedures must be revised to take account of the findings from exercises.

<b>Date: Draft</b>
<b>Procedure Reference: 4.1.1</b>
<b>Title: Waste Acceptance and Inventory</b>
<b>Related Procedures:</b> 4.1.2 Waste Analysis 4.1.3 Waste Classification 4.1.4 Waste Handling and Storage 4.1.5 Waste - Training of Operators 4.1.6 Waste - Controlled/Directive Waste Consignment 4.1.7 Waste - Special Waste Consignment 4.1.11 Waste - Record Keeping
<b>Summary:</b> An inventory of all wastes accepted at the site must be maintained.
<b>Procedure</b> <ol style="list-style-type: none"><li>1. The site operator is responsible for ensuring that an inventory is maintained of all wastes accepted and stored at the site.</li><li>2. The inventory should, as appropriate, include the following information about each waste type:<ul style="list-style-type: none"><li>• Description of the waste and what it is called</li><li>• processes which produced the waste</li><li>• known chemical and physical properties of the waste (refer to Procedure 4.1.2)</li><li>• properties of the waste</li><li>• estimated quantities</li><li>• potential environmental and health and safety hazards associated with the waste</li><li>• normal handling, labelling and storage requirements</li><li>• date placed in store and location of the place where it is stored.</li></ul></li><li>3. Information required to complete the inventory must be sought from all persons wishing to deposit waste in skips or directly at the site using the Company Duty of Care Forms.</li></ol>

## Waste Acceptance

4. Upon arrival at the site, wastes will be visually examined to check that they match the description on the Duty of Care Transfer Notes and are permitted at the site under the Licence. If they appear to be acceptable waste, the load will be discharged onto the concrete hardstanding. Once discharged, the load will again be visually examined to check for the presence of any non-permitted wastes, particularly any liquid or otherwise hazardous wastes. If the waste is acceptable, at that point they will be deemed to have been accepted and sorting will commence.
5. If a load is found to contain non-permitted waste in a substantial quantity, the load will be rejected and if safe to do so moved to the quarantine area or repackaged pending return to its producer or off-site disposal. In this circumstance, the site operator and the Environment Agency must be informed immediately. The site operator must complete Form 11.1.1 giving details of the incident, identity (if known) of the producer etc and also make an entry in the site diary giving reference to the Form 11.1.1.
6. If a load is found to contain a small quantity of a non-permitted waste, and it is impracticable to return it to the producer, the waste should be removed, if this can be done safely, to the quarantine area for storage pending disposal off-site. In this circumstance, the site operator must be informed immediately. The site operator must complete Form 11.1.1 giving details of the incident, identity (if known) of the producer etc. and make an entry in the site diary referring to the Form 11.1.1. The site operator should determine whether the incident is sufficiently serious to warrant informing the Environment Agency
7. Any load containing dry dusty materials or loose light materials will be held over in the holding area if the windspeed is greater than 20 mph to avoid release of dust or litter from the tipping/sorting operation.

Date: Draft

**Procedure Reference: 4.1.2**

**Title: Waste Analysis**

**Related Procedures:**

- 4.1.1 Waste Acceptance and Inventory
- 4.1.3 Waste Classification
- 4.1.6 Waste - Controlled/Directive Waste Consignment
- 4.1.7 Waste - Special Waste Consignment
- 4.1.11 Waste - Record Keeping

**Summary:**

All wastes for which chemical and physical properties are not known must be subject to analysis.

**Procedure**

1. The site operator is responsible for ensuring that where the chemical and physical properties of any waste deposited at the site, i.e. a waste is suspect or thought to be a non-permitted waste under Procedure 4.1.1, where appropriate representative samples are taken and analysed so that: the waste can be correctly classified, and correctly packaged and labelled; an adequate Waste Transfer Note and Special Waste Consignment Note can be completed and sufficient information can be given to the carrier or contractor.
2. Sampling and analysis may be performed in-house or by the selected waste contractor.
3. The sample of waste should be labelled to indicate its source (including reference to container numbers where these are available). Records should be kept of the following information:
  - date and time of sample collection
  - sample reference number
  - location
  - description of sample
  - other additional information.Samples should be despatched for analysis as soon as possible to avoid deterioration. Samples containing hazardous substances should not be posted but should be despatched by couriers who have been advised of the nature of the hazard. Containers should be labelled in accordance with regulations.
4. Results of analysis must be evaluated by the site operator or other nominated person to determine the appropriate classification of the waste (refer to Procedure 4.1.3) any hazards to health, safety or the environment, and the packaging, handling, storage and labelling requirements for the waste. This information must be entered in the waste inventory (refer to Procedure 4.1.1).
5. The results of the chemical and physical analysis together with any recommendations regarding handling, labelling, storage, packaging, or safety requirements must then be provided to the person responsible for the consignment of the waste.

6. Prior to consignment to a waste carrier, contractor or disposal/treatment facility, copies of the analytical results should be provided so that an assessment can be made of the suitability of the intended destination (refer to Procedures 4.1.6, 4.1.7). This information must also be included on any Waste Transfer Notes or Special Waste Consignment Notes that are prepared for the waste (refer to Procedures 4.1.6, 4.1.7).

Date: Draft

**Procedure Reference: 4.1.3**

**Title: Waste Classification**

**Related Procedures:**

- 4.1.1 Waste Acceptance and Inventory
- 4.1.2 Waste Analysis
- 4.1.11 Waste - Record Keeping

**Summary:**

All wastes must assessed to determine the appropriate classification prior to transport, disposal, treatment or recycling.

**Procedure**

1. The site operator is responsible for ensuring that all wastes are appropriately classified prior to their transport, disposal, treatment or recycling.
2. The available information on the nature of the waste and its chemical and physical properties should be assessed in order to determine the appropriate classification. Information on the classification of existing waste types may already be available in the inventory or register of waste (refer to Procedure 4.1.1). Where the appropriate classification for existing waste types or for new waste types is not known, sampling and analysis may be required (refer to procedure 4.1.2)
3. Classification of waste may require consultation with the Environment Agency where classification is uncertain. Some waste disposal contractors may also assist in deciding upon appropriate classifications for waste. The Site Operator or nominated waste manager must ensure that adequate information is provided to the contractor so that they can assess wastes against the acceptance criteria for the intended destination.
4. Waste should be classified into one (or sometimes more than one) according to the appropriate category for the waste which may include but not be limited to the following:
  - Special Waste (six digit code listed under the Special Waste Regulations 1996)
  - Special Waste (equivalent degree of hazard to above substances)
  - Difficult Waste (eg tyres)
  - Non-hazardous Waste (eg cardboard, wood)
  - Inert Waste (eg brick, uncontaminated sub-soil)
5. Once a waste has been classified, the inventory or register of waste must be updated. The departmental manager responsible for the waste must also be advised of the classification.

Date: Draft

## **Procedure Reference: 4.1.4**

**Title: Waste Handling and Storage**

### **Related Procedures:**

4.1.1 Waste Acceptance and Inventory

### **Summary:**

All wastes must be appropriately labelled, packaged, stored and handled.

### **Procedure**

1. The site operator is responsible for ensuring that there are adequate procedures in place to ensure that all wastes are appropriately labelled, packaged, stored and handled at the site.

### **Labelling**

2. The available information on the nature of any wastes posing hazards to the environment or health and safety and their chemical and physical properties should be assessed by an authorised person in order to determine the appropriate labelling or road transport warning placard requirements. For specialist transport of hazardous wastes, this responsibility will be assumed by the contractor upon receipt of copies of the inventory control forms (For 4.1.1) relevant to the consignment and prior to transportation.

### **Packaging**

3. The available information on the nature of the waste and its chemical and physical properties should be assessed by an authorised person to determine whether any specific packaging requirements apply. Packaging should be adequate to prevent the escape of waste when subject to the stresses and strains in normal handling.

### **Storage**

4. The available information on the nature of each waste type and its chemical and physical properties should be assessed by an authorised person in order to determine the appropriate storage requirements whilst the waste is on-site. Waste stores will be clearly marked to show their contents and specific warning notices placed to indicate any hazardous properties (eg flammable) as according to regulations. Waste stores and storage areas will be designed and maintained to take into account the following.
  - Specific waste (principally those with hazardous properties) must be securely stored with appropriate access controls.
  - Waste storage areas must be hard surfaced with impermeable concrete, clay, steel or other forms of base. Storage in stockpiles, (inert waste, soil and wood) should be adequately located in order to ensure containment of any surface water runoff.
  - Incompatible wastes must not be stored together, eg concrete must not be allowed to mix with wood intended for shredding..

- Where appropriate, waste stores should be protected from rain and strong winds (through sheeting or netting).
- Skips will be labelled to show what types of waste can be placed in them.
- In general, the quantities of waste in storage at the site will be kept to a minimum feasible level as determined by the quantity that is practical and economic to consign for disposal, recovery operations or off-site recycling.
- Waste storage areas will be maintained to allow easy and safe access for personnel and for waste handling and removal.

Date: Draft

**Procedure Reference: 4.1.5**

**Title: Waste - Training of Operators**

**Related Procedures:**

4.1.4 Waste Handling and Storage

**Summary:**

All personnel who are required to undertake any operations involving waste must be appropriately informed about and trained in normal and emergency procedures.

**Procedure**

1. The site operator is responsible for ensuring that all personnel who are required to undertake any operations involving waste are appropriately informed and trained. Training and information should cover normal operations and actions to be taken in the event of emergencies
2. Activities involving waste may include transporting waste around the site, acceptance procedures, consignment of waste, record keeping, labelling waste and other such activities, procedures in high winds, waste recovery operations, plant and equipment operations etc. In order to ensure their health and safety and that of others and to minimise risks to the environment it is important that all employees who may handle waste are trained in the following.
  - Identifying and categorising waste and deciding what procedures need to be followed for its safe handling, storage, recovery or disposal.
  - Identifying new types of waste for which there are no existing procedures or specified systems. For example, what to do if a radioactive source, an item containing explosives, clinical waste or animal by products is identified in a waste load.
  - Labelling requirements for on-site storage and off-site movement of waste.
  - Packaging or containment requirements for waste.
  - Location of waste stores for each type of waste, and access control arrangements.
  - Reporting unusual occurrences or suspected waste offences committed by others such as illegal deposit of waste or deposit of non-permitted wastes.
  - Health and safety precautions.
  - Emergency procedures.
  - Safe operation and authorised personnel restrictions for working with any specialised waste handling equipment such as balers, chippers etc.
  - Record keeping procedures.
  - Documentation procedures for consignment of waste including who is authorised to complete and sign waste transfer notes or consignment notes.

- |  |
|--|
| <ol style="list-style-type: none"><li>3. Training given must be recorded in personnel files for each employee.</li><li>4. Induction training for new employees must include waste handling procedures.</li></ol> |
|--|

Date: Draft

**Procedure Reference: 4.1.6**

**Title: Waste - Controlled/Directive Waste Consignment**

**Related Procedures:**

- 4.1.7 Waste - Special Waste Consignment
- 4.1.9 Waste - Checks on Waste Carriers and Contractors
- 4.1.10 Waste - Checks on Waste Disposal, Treatment or Recycling Contractors
- 4.1.11 Waste - Record Keeping

**Summary:**

Controlled/Directive Waste must be consigned for transport, treatment, recycling or disposal in accordance with statutory requirements.

**Procedure**

1. The site operator is responsible for ensuring that a clear system of responsibilities is in place to ensure that all Controlled/Directive Waste consigned to third parties from the site is appropriately and securely packaged, labelled and handled and that adequate Controlled/Directive Waste Transfer Notes are provided. This Procedure applies to all Controlled or Directive Wastes leaving the site. Procedure 4.1.7 documents the additional steps that must be taken in consigning Special Waste.
2. The site operator will ensure that there are clearly defined responsibilities for the following:
  - deciding when waste requires to be transported off –site
  - arranging for waste to be transported using an authorised person or a person authorised for transport purposes under the relevant legislation
  - completing a Controlled/Directive Waste Transfer Note in accordance with the requirements of the Environmental Protection (Duty of Care) Regulations 1991
  - completing an adequate written description of the waste to show its general nature, where appropriate the specific processes from which it was produced, information on any hazardous properties or special problem associated with the waste and any other relevant information required under the Regulations
  - inspecting waste prior to transport to ensure that it is: safe; where required, labelled; and free from obvious dangers, including the risk of spillage or blowing onto the highway
  - keeping adequate records of all waste sent for transport, treatment, recycling or disposal including the nature, waste type, quantity and date removed.
3. All waste that is transferred to another person must be accompanied by the written description of the waste and a Controlled/Directive Waste Transfer Note. In some cases, an annual Transfer Note may be used for multiple consignments where waste characteristics and disposal route do not change. Written descriptions and Transfer Notes

must be prepared prior to transfer of the waste.

4. Regular checks must be made on all waste carriers or contractors to ensure that they are suitably licensed or registered and are competent to deal with the waste safely and without risk to the environment (refer to Procedures 4.1.9, 4.1.10)
5. Before waste is consigned for transport, treatment, recycling or disposal, an authorised member of staff must inspect the waste to ensure that it is:
  - securely packaged or contained
  - adequately labelled where necessary
  - free from obvious dangers or risk of spillage or loss
  - as described on the Controlled/Directive Waste Transfer Note, and where applicable, the Special Waste Consignment Note.
6. At the time of transfer to another person, the authorised person must ensure that the written description and a Transfer Note/ Special Waste Consignment Note are given to the recipient of the waste and that they sign to acknowledge receipt (except in the case of waste covered by an annual transfer note for multiple consignments). The recipient must be made aware of any specific hazards and precautions that must be taken.
7. Copies of all documentation will be retained and held on record at the site for at least two years for Controlled/Directive Waste and at least three years for Special Waste (Refer to Procedure 4.1.11).

Date: Draft

**Procedure Reference: 4.1.7**

**Title: Waste - Special Waste Consignment**

**Related Procedures:**

- 4.1.1 Waste Acceptance and Inventory
- 4.1.2 Waste Analysis
- 4.1.3 Waste Classification
- 4.1.6 Waste - Controlled/Directive Waste Consignment
- 4.1.9 Waste - Checks on Waste Carriers and Contractors
- 4.1.10 Waste - Checks on Waste Disposal, Treatment or Recycling Contractors
- 4.1.11 Waste - Record Keeping

**Summary:**

Special Waste must be consigned for treatment, recycling or disposal in accordance with statutory requirements.

**Procedure**

1. The site operator is responsible for ensuring that a clear system of responsibilities is in place to ensure that all Special Waste consignments of quarantined waste are handled in accordance with the prenotification requirements under Special Waste Regulations 1996 (as amended). This Procedure applies to all Special Waste consignments, and Procedure 4.1.6 documents the additional steps that must be taken to ensure compliance with the Environmental Protection (Duty of Care) Regulations 1991.
2. The site operator must ensure that there are clearly defined responsibilities for the following:
  - deciding when Special Waste needs to be transported, treated, recycled or disposed
  - arranging for waste to be transported, treated, recycled or disposed
  - obtaining a prenotification form and despatching to the Environment Agency at least three days prior to waste consignment
  - consigning waste and signing documents at the time of transfer
  - keeping adequate records of all waste sent for transport, treatment, recycling or disposal.
3. A Special Waste Consignment Note number must be completed and the appropriate copies sent to the Environment Agency in time to give them at least three working days notice of a waste transfer.
4. At the time of transfer, an authorised person must complete the final sections of the form and Despatch copy must then be sent to the Environment Agency.
5. At the time of transfer the waste should also be accompanied by the written description of the waste and a controlled/directive waste transfer note required under Procedure 4.1.6.
6. The Producer's copy of the Special Waste Consignment Note must be retained and held on record for at least three years for Special Waste (refer to Procedure 4.1.11).

Date: Draft

**Procedure Reference: 4.1.8**

**Title: Waste -Transportation in Company Controlled Vehicles**

**Related Procedures:**

2.2.4 Loading and Unloading of Environmentally Hazardous Substances

**Summary:**

Where waste is transported in Company controlled vehicles, procedures must be in place to ensure that waste is transported safely and in compliance with regulations.

**Procedure**

1. The site operator is responsible for ensuring that a clear system of responsibilities is in place to ensure that all waste that is transported in Company controlled vehicles is transported safely and in accordance with regulations.
2. The site operator must ensure that there are clearly defined responsibilities for the following:
  - assessing whether any wastes are suitable for transported in Company controlled vehicles/skips (i.e. secure, not overloaded, free of excessive moisture or contamination, sheeted to contain debris)
  - determining who was the producer of the waste and whether a DOC transfer note is available
  - determining what specific regulations apply to the transportation of the waste
  - ensuring that the waste is transported safely and in accordance with regulations.
3. Where wastes are transported, they must be securely packaged, labelled in accordance with regulations and safely handled.
4. Loading and unloading of wastes must be in accordance with Procedure 2.2.4.

Date: Draft

## **Procedure Reference: 4.1.9**

**Title: Waste - Checks on Carriers and Contractors**

### **Related Procedures:**

- 4.1.11 Waste - Record Keeping
- 11.1.1 Recording and Reporting of Environmental Incidents
- 11.1.2 Analysis of Environmental Incidents

### **Summary:**

Where waste is consigned to contractors for transport, procedures must be in place to ensure that waste is transported safely and in compliance with regulations.

### **Procedure**

1. The site operator is responsible for ensuring that a clear system of responsibilities is in place to ensure that all waste that is consigned to contractors for transport is transported safely and in accordance with regulations.
2. The site operator must ensure that there are clearly defined responsibilities for the following:
  - assessing any wastes to be transported by contractors
  - verifying that all contractors are registered as waste carriers, Waste Collection Authorities, licensed waste management contractors or are exempt for registration or licensing requirements
  - determining what regulations apply to the transportation of the waste
  - ensuring that the waste is transported safely and in accordance with regulations.
3. The site operator must ensure that adequate checks are made on all contractors who may carry waste from the site to confirm that they are a registered waste carrier, a Waste Collection Authority, a licensed waste management contractor or are exempt from the waste carriers registration or licensing requirements. No waste is to be consigned for transport unless authenticated documentary evidence has been provided by the contractor or carrier. Where there is any doubt, confirmatory checks must be made with the Environment Agency. Copies of documents produced should be placed on file (refer to Procedure 4.1.11) together with any other relevant information.
4. Where wastes are transported, they must be securely packaged, labelled in accordance with regulations and safely handled and where wastes may liberate mud or debris, that they are properly contained before leaving the site.
5. Where there is any suspicion that a waste carrier has breached, or is likely to breach, the Duty of Care for waste, the site operator or other authorised person must initiate an investigation which includes the following action:
  - establish the facts and check their validity
  - suspend any further dealings with the carrier/contractor, providing that contract conditions allow this option
  - take all reasonable steps that can be taken at that time

- inform the Environment Agency as required by regulation
- record details of the incident and the subsequent investigation (refer to Procedures 11.1.1 and 11.1.2).

Date: Draft

## **Procedure Reference: 4.1.10**

### **Title: Waste - Checks on Waste Treatment, Disposal or Recycling Contractors**

#### **Related Procedures:**

- 4.1.11 Waste - Record Keeping
- 11.1.1 Recording and Reporting of Environmental Incidents
- 11.1.2 Analysis of Environmental Incidents

#### **Summary:**

Where waste is sent for treatment, recycling or disposal, checks should be made to ensure that such facilities are licensed, suitable for the waste and that waste will be handled safely without causing pollution or contravention of regulations or licence conditions.

#### **Procedure**

1. The site operator must ensure that for all waste consigned for disposal or recovery off-site, the following checks are made
  - the site is appropriately licensed
  - the site is licensed to accept the type of waste sent to it and it meets the site's acceptance criteria
  - the site can accept the quantity of waste sent to it
  - the site is complying with the site licence conditions
  - the contractor is competent to deal with the waste safely without causing pollution.
2. No waste is to be consigned for disposal, treatment or recycling unless authenticated documentary evidence has been provided by the contractor to prove that the site is licensed and that the license permits treatment, recycling or disposal of the waste(s) concerned. Where there is any doubt, confirmatory checks must be made with the Environment Agency. Copies of documents produced should be placed on file (refer to Procedure 4.1.11) together with any other relevant information.
3. Where there is any suspicion that a waste contractor has breached, or is likely to breach, the Duty of Care for waste, the site operator must be informed immediately (refer to Procedure 11.1.1). The site operator or other authorised person must initiate an investigation which includes the following action:
  - establish the facts and check their validity
  - suspend any further dealings with the contractor, providing that contract conditions allow this option
  - take all reasonable steps that can be taken at that time
  - inform the Environment Agency as required by regulation
  - record details of the incident and the subsequent investigation (refer to Procedure 11.1.1 and 11.1.2)..

**Procedure Reference: 4.1.11**

**Title: Waste - Record Keeping**

**Related Procedures:**

**Summary:**

Records must be maintained of all information with regard to management of waste at the site.

**Procedure**

1. The site operator is responsible for ensuring that adequate record keeping arrangements are in place for all information concerning waste management at the site, including all records required under Site Licence conditions. Daily records will be held within the site cabin and will be transferred to the Brecon Recycling Centre office at frequent intervals for secure storage.
2. A central file and a waste inventory will be maintained which includes, where appropriate, the following records:
  - copies of waste carriers registration documents for all waste carriers
  - copies of waste management licenses for all waste contractors
  - information on any checks that are made on carriers or contractors
  - copies of all Controlled/Directive Waste Transfer Notes
  - copies of all Special Waste Consignment Notes
  - copies of weighbridge records and waste quantification data
3. The above information must be kept for a minimum of two years in the case of Controlled/Directive Waste and three years in the case of Special Waste or any other such periods as specified in the Site Licence.
4. In addition a site diary will be maintained at the site which is updated daily and which records all specified records and observations that are required under the Site Licence. Diary entries will be dated and signed by the person making the entry. The following information will be recorded in the site diary:
  - Record of all wastes rejected as being non-permitted wastes under the site licence
  - Any occurrence of emissions of dust, fibres, particulates, odours, pests, scavengers, litter and the action taken in response
  - Construction work, maintenance, breakdowns, specific problems with waste, severe weather conditions, complaints, environmental problems and remedial actions taken
  - Attendance at site of the technically competent person(s)
  - Site inspections

- Despatch of records to the Environment Agency.
-

Date: Draft

**Procedure Reference: 5.1.1**

**Title: Emissions – Inspections**

**Related Procedures:**

**Summary:**

Daily inspections must be undertaken of all emissions/discharges and general conditions on-site and the immediate environs.

**Procedure**

1. The site operator is responsible for ensuring that adequate daily inspections/observations are undertaken for all emissions/discharges and general conditions on-site and in the immediate environs of the site and that results are recorded in the site diary (Procedure 4.1.11). The site operator must specify what observations/inspections must be undertaken.
2. The following information must be recorded daily, where appropriate:
  - date and time of inspection/observation
  - location of observation
  - description of findings
  - whether findings are acceptable or unacceptable
  - whether site conditions are acceptable and that wastes are correctly stored
  - any corrective actions taken
  - adverse weather conditions including wind, surface water runoff conditions, extreme heat or cold
  - any other relevant information.
3. Inspections/observations will include:
  - visual observations of emissions/discharges including condition of site surface water drains
  - olfactory observations of emissions
  - auditory observations of noise emissions
  - correct functioning of equipment and its condition.
4. Any findings that indicate deterioration of conditions or exceedance of limits or Site Licence Conditions must be reported to the site operator or nominated person immediately. This information must be recorded in the site diary. In some circumstances, there may be a requirement to advise the Environment Agency, as specified in the Site Licence, within the specified time period.
5. Persons undertaking daily observations/inspections must be appropriately trained in the

methods to be used and in the interpretation of results.

Date: Draft

**Procedure Reference: 5.2.1**

**Title: Discharge Monitoring**

**Related Procedures:**

**Summary:**

All discharges to 'controlled waters' must be subject to monitoring.

**Procedure**

1. The site operator is responsible for ensuring that appropriate checks are undertaken of discharges from the site via the surface water drainage system which connects to a controlled water and that action is taken when required to ensure compliance with discharge consent conditions. Checks will be limited to regular visual inspection of the site surface water drainage channels, the sediment trap, the chambers at the interceptor and the outfall.
2. Where required (for example if there is risk that pollution may have been or is escaping via the drains), any samples of discharge quality must be collected at the point of discharge sampling specified in the Consent (the interceptor outfall chamber). Where samples are collected by Company, the following procedure should be followed.
3. The sample must be collected in a suitable container which will preserve the sample without reacting with it. In some situations, sample preservatives must be added and advice should be sought from the laboratory undertaking the analysis. The collected sample should be labelled to indicate its source. Records should be kept of the following information:
  - date and time of sample collection
  - sample reference number
  - location
  - description of sample
  - other additional information.

Samples should be despatched for analysis as soon as possible to avoid deterioration. Samples containing hazardous substances should not be posted but should be despatched by couriers who have been advised of the nature of the hazard. Containers should be labelled in accordance with regulations.

4. Results of analysis whether undertaken by the Environment Agency or by the Company must be evaluated by the site operator or other nominated manager to determine: the appropriate classification of the discharge (ie presence of prescribed substances); any hazards to health, safety or the environment; any actions that need to be taken and comparison against consent conditions.

**Procedure Reference: 6.1.1**

**Title: Site Diary**

**Related Procedures:**

**Summary:**

A site diary will be maintained in compliance with licence conditions

**Procedure**

1. The site operator will ensure that a suitable and sufficient site diary is maintained at the site which includes, as appropriate, records of the following conditions or events:
  - Construction work
  - Maintenance, including emptying of interceptors
  - Breakdowns
  - Emergencies
  - Problems with waste received and action taken
  - Site inspections and consequent actions carried out
  - Technically competent management attendance at site, the date, time on and time off site.
  - Despatch of records to the Environment Agency
  - Severe weather conditions
  - Complaints about site operations and actions taken
  - Environmental problems and remedial actionsAll records will be completed within 24 hours of the relevant event.
2. Copies of completed diaries will be stored for 2 years at Brecon Recycling Centre.
3. All personnel who may be required to complete diary entries will be appropriately trained in the above requirements..

Date: Draft

**Procedure Reference: 8.1.1**

**Title: Systems of Work**

**Related Procedures:**

**Summary:**

Safe systems of work should be specified for all tasks involving potential risks to the environment. Examples of tasks which may involve risks to the environment would include:

- handling and reloading environmentally hazardous non-permitted waste
- application of pesticides
- handling dusty wastes in windy conditions
- emptying or draining down gulleys, sediment trap, interceptor or other silty water

**Procedure**

4. The site operator is responsible for identifying all tasks that may involve potential risks to the environment. All new tasks that are to be undertaken should be assessed in advance to determine whether a safe system of work is required.
5. For all tasks identified as posing significant risks to the environment or safety written safe systems of work must be prepared covering the following, where appropriate:
  - description of task
  - pre-authorisation requirement or permit-to-work requirement
  - supervision requirements
  - operator training requirements
  - system of work for normal operation
  - reference to emergency procedures
  - record keeping requirements.
6. Copies of written safe systems of work should be made available to all employees or contractor involved in the undertaking of the identified task.
7. All personnel who may be required to undertake tasks identified under this Procedure must be trained in the appropriate safe system of work. Records of all training given must be recorded in the individual's personnel file.

Date: Draft

**Procedure Reference: 9.1.1**

**Title: Land and Premises Assessment**

**Related Procedures:**

**Summary:**

The site and premises must be subject to regular planned assessment to identify any adverse environmental impacts and other conditions relevant to promoting a good image of the site and its activities.

**Procedure**

1. The site operator or other authorised person is responsible for ensuring that, in addition to any daily inspections required under the Site Licence, that a formal weekly assessment is undertaken of the site and its immediate surroundings. The aims of the assessment are to:
  - Identify any potential adverse environmental impacts
  - Identify any conditions that would detract from the site's good image and to identify any opportunities to maximise positive environmental impacts.
2. The assessment must include consideration of the issues, as appropriate, listed on the assessment checklist (Form 9.1.1).
3. Copies of any significant findings, recommendations and actions taken should be noted on the Site Diary

**Form: 9.1.1**

**Land and Premises Assessment Checklist**

Reference: Procedure 9.1.1

**SECTION 1**

Current Negative Environmental Impacts (tick box(es)) and list in recommendations if appropriate

	Unightly, untidy, neglected, or litter present
	Broken or deteriorating fences, structures etc
	Blocked or silted drains or gulleys
	Surface contamination due to leaks or spills, particularly any that may be slippery when wet or may pose a risk of water pollution or mud or debris on site access roads or the lane
	Invasive weeds
	Dust, odour or other nuisances
	Vermin, pests, scavengers
	Hazards to health and safety
	Inadequate site signs, warning signs, information signs
	Other

Current Positive Environmental Impacts (tick box(es))

	Tidy, neat, well maintained fences
	Landscaping maintained
	Adequate drainage
	Uncontaminated and clean surface areas
	Presence of native animal or bird species or their habitats (non-pest)
	Secure boundary, warning signs, information signs
	Traffic management systems in place and working
	Other

**SECTION 2 RECOMMENDATIONS**

Use this section to list all recommended actions arising from the assessment undertaken in SECTION 1.

Recommendation

Priority 1 / 2 / 3

Person Responsible	
Date completed	

**SECTION 3**

Date of assessment

Person completing this assessment

Signature


Date: Draft

**Procedure Reference: 9.2.1**

**Title: Pesticide Use**

**Related Procedures:**

**Summary:**

A review of planned pesticide use for pest control must be undertaken to ensure that:

- only approved pesticides are used
- pesticides used have minimum environmental persistence
- minimum quantities are used
- chemicals are controlled and used in accordance with legal requirements.

**Procedure**

1. The site operator or authorised person is responsible for ensuring that the planned application of any pest control pesticides is reviewed to ensure minimum risk to the environment.
2. Pesticides include:
  - insecticides
  - herbicides
  - fungicides
  - rodenticides
  - fumigants
3. The assessment must include consideration of the issues listed on the assessment checklist (Form 9.2.1).

**Form: 9.2.1**

**Pesticide Review Checklist**

**Reference: Procedure 9.2.1**

**SECTION 1**

Description of pesticide proposed

Method of application of proposed pesticide

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**SECTION 2**

Do Any of the Following Apply? (tick box(es))

	Pesticide is a scheduled substance for release to controlled waters
	Pesticide is banned or use is restricted by law
	Pesticide is restricted from use near water

Are the Following Adequate? (tick box(es))

Yes                  No

		Training of operators
		Correct pesticide rate of application
		Method of disposal of pesticide containers
		Handling and application procedures
		Decontamination procedures
		Emergency procedures and equipment
		Precautions against contamination of water
		Measures to minimise quantities used
		Record keeping

**SECTION 3 RECOMMENDATIONS**

Use this section to list recommended actions arising from the assessment undertaken in SECTION 2 and bring to the notice of the Pest Control Contractor.

Recommendation

<b>Signed</b>	
<b>Date</b>	

Date: Draft

**Procedure Reference: 10.1.1**

**Title: Change Control**

**Related Procedures:**

**Summary:**

Adequate controls must be implemented to control change to ensure that:

- environmental objectives are defined
- environmental objectives are achieved
- Environment Agency is advised of any significant changes
- corrective mechanisms are in place should the need arise.

Relevant changes may include:

- developments and changes to site infrastructure
- changes in plant, equipment or systems
- changes in location of activities

**Procedure**

1. The site operator or other nominated manager is responsible for ensuring that where changes are planned or occur, the environmental and Licensing implications of such changes are assessed, and appropriate measures introduced to control the change.
2. Changes must:
  - comply with the requirements of the Site Licence, including notification of modifications to the Working Plan
  - meet relevant legal requirements
  - ensure satisfactory interaction with other components of the management system such as health and safety.
3. Where changes are planned, the Change Approval Form 10.1.1 must be completed by a nominated manager prior to the change being implemented. While the change is being implemented, adequate procedures must be in place to monitor the effects of the change
4. The nominated manager must ensure that, where changes are planned, appropriate arrangements are in place for:
  - reviewing relevant environmental literature
  - obtaining specialist advice
  - consulting with relevant personnel who may be affected by the proposed change
  - consulting with relevant enforcing authorities and the Environment Agency
  - consulting with customers, relevant contractors etc
  - identifying training/re-training requirements.

5. The nominated manager must ensure that adequate records are maintained and, where appropriate, related documents are up-dated to take account of the change and that any notifications to the Environment Agency required under the Licence are submitted and recorded in the site diary
-

**Form: 10.1.1**

**Change Approval**

**Reference: Procedure 10.1.1**

**Description of proposed change**

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**Which of the following environmental issues apply to the proposed change?  
(tick box(es))**

	change subject to specific statutory environmental requirements including Site Licence Conditions
	change will alter the Working Plan
	waste acceptance criteria/ storage/treatment/recycling/disposal
	storage or handling of environmentally hazardous wastes
	discharges to 'controlled waters' via surface water drains
	emissions to atmosphere
	noise
	visual impact including litter, mud
	species, habitats
	access routes or traffic control on-site
	site security
	warning notices, signs, information
	safe systems of work
	pests, scavengers
	emergency plans
	Others (specify)

**Summary of the foreseeable, significant consequences of the proposed change**

--

**Summary of the environmental objectives applying to the proposed change**

--

**Description of the arrangements for ensuring that the above objectives are met**

<b>Responsibilities</b> - implementation - monitoring - approvals	
--	--

Resources	
Training	
Documentation	
Liaison (internal)	
Liaison (external)	

Attach related documents to this form.

Date of assessment

Person completing this assessment

Signature


Change approved by:

Person(s)	Signature

**Procedure Reference: 11.1.1**

**Title: Recording and Reporting of Environmental Incidents**

**Related Procedures:**

**Summary:**

All environmental incidents must be recorded and, where appropriate, reported to the enforcing authorities.

In this procedure, incidents are also taken to include near misses.

Environmental incidents may include:

- leaks, spillage or unplanned releases
- failure of plant equipment or systems
- breach of limits or Site Licence Conditions
- breach of policy or formal procedure
- significant complaints
- environmental pollution including any release of polluting matter to the site drains
- offences by waste carriers or contractors
- deposit of non-permitted wastes

**Procedure**

1. All employees are responsible for reporting environmental incidents to the site operator or nominated manager. All incidents must be recorded on Form 11.1.1. Completed copies of Form 11.1.1 must be given to the nominated manager or site operator as soon as possible after the incident. Where procedures or Licence Conditions require additional, specific records to be maintained, these should be in the form required.
2. Where an incident is serious, the Environment Agency must be informed immediately by telephone or other agreed mechanism. A serious incident would include:
  - actual or imminent risk of significant environmental pollution
  - breach of statutory limits or Site Licence Conditions
  - any incident that must be reported to the enforcing authorities
  - deposit of significant amounts of a non-permitted waste in skips or directly at the site
  - any incident that could foreseeably lead to serious public complaint or media enquiries
  - major damage to plant, equipment, premises including fires on-site
  - serious injury of the public

- serious near-misses which could have foreseeably lead to any of the above.

A copy of Form 11.1.1 must be provided to the site manager as soon as possible after the verbal report has been made.

3. A central file containing all Incident Report Forms 11.1.1 will be maintained and will be reviewed at regular intervals to identify whether any trends or patterns can be discerned.
4. Where an incident is required to be reported to the enforcing authorities, the site operator must ensure that this report has been made within the required time period and in the specified format.

**Form: 11.1.1**

**Incident Reporting**

**Reference: Procedure 11.1.1**

**Location of Incident/Near Miss**

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**Description of Incident/Near Miss**

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**Type of Incident/Near Miss (tick box(es))**

<input type="checkbox"/>	Breach of limit/Licence Condition
<input type="checkbox"/>	Plant/Equipment failure
<input type="checkbox"/>	Leak/spill
<input type="checkbox"/>	Accidental discharge/Release
<input type="checkbox"/>	Serious Complaint
<input type="checkbox"/>	Waste offence
<input type="checkbox"/>	Environmental pollution
<input type="checkbox"/>	Hazard to safety/ health/ environment
<input type="checkbox"/>	Serious injury to staff or public
<input type="checkbox"/>	Fire/explosion/reaction
<input type="checkbox"/>	Damage to property

<input type="checkbox"/>	Other	
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<input type="checkbox"/>	Reportable Incident?	
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**Personnel Involved**

Name	Role in Incident

**Corrective Actions Taken (include any reports to enforcing bodies)**

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**Actual or Foreseeable Potential Consequences Known at this Time  
 (tick box(es))**

<input type="checkbox"/>	Prosecution
<input type="checkbox"/>	Enforcement/Prohibition/Improvement Notice
<input type="checkbox"/>	Civil Claim
<input type="checkbox"/>	Clean - up/restoration
<input type="checkbox"/>	Breach of Licence requirements
<input type="checkbox"/>	Adverse publicity, public reaction
<input type="checkbox"/>	Adverse customer reaction
<input type="checkbox"/>	Contamination of water leading to harm to protected habitats or species
<input type="checkbox"/>	Health effects

**Other Relevant Information**

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**Persons to Whom the Incident has been Reported**

Person Informed	Date/time

**Report Completed by**  
**Date**  
**Time**  
**Signature**


Date: Draft

**Procedure Reference: 11.1.3**

**Title: Compliance Audits**

**Related Procedures:**

**Summary:**

Compliance audits must be carried out at appropriate intervals.

**Procedure**

**Environmental Audits**

1. The site operator must establish a programme of planned compliance audits to ensure that Site Licence and other consent/permit requirements are being met. Audits must be undertaken by properly trained persons.
2. The compliance audits will be undertaken on at least a bi-annual cycle using the CHASE system.
3. Audit reports must be made held on file and available for inspection by customers and the Environment Agency as required.

Date: Draft

**Procedure Reference: 12.1.1**

**Title: Environmental Emergency Plan**

**Related Procedures:**

2.2.3 Emergency Action in the Event of Spills or Leaks from Storage Facilities

**Summary:**

An environmental emergency plan must be prepared which cover responses all foreseeable major environmental emergencies.

**Procedure**

1. The site operator is responsible for ensuring that an adequate environmental emergency plan is prepared and kept up-to-date. The plan must:
  - identify the type, location and likelihood of all foreseeable environmental emergencies
  - highlight critical emergencies and predict their environmental consequences
  - specify the responsibilities and responses to emergencies
  - comply with statutory and Site Licence requirements including PPG 21
  - specify external and internal communication channels
  - specify emergency contacts (including 24 hour cover).
2. All personnel who may be involved in emergencies must be trained in the responses and provided with adequate personal protective and emergency equipment.
3. The emergency plan must be held both on site and at the Brecon Recycling Centre with additional copies held by all technically competent persons named in the Site Licence application and Licence.
4. The site operator will ensure that any emergency response materials that are required under the plan are available at site in close proximity to the area where they would be required. At a minimum such materials will include:
  - At least 25kg of absorbent clay or fibre granules suitable for oil and other liquid spillages
  - At least 25 kg of dry sand suitable for absorbing spills of other liquids
  - Suitable 150mm diameter drain seal bung for final outfall from interceptor
  - Dry powder ABC category fire extinguisher suitable for flammable liquid and solids fires and any other response fire fighting equipment that may be required.
  - Empty drum or other similar container suitable for temporary storage of contaminated absorbents and other spilled materials
  - Appropriate personal protective equipment.

The location of all emergency equipment will be clearly marked by appropriate emergency action signage.

## WP/8 Document History

Date	Status	Circulation and revisions
07/06/04	Draft V1.0	Preliminary draft for submission to EA.

## WP/9 Risk Assessments

<b>Table WP A1: Solid wastes which are likely to give rise to significant amounts of dusts, fibres, powders or particulates</b>		
<b>Risk phrases</b>	<b>Hazardous event &amp; Pathway</b>	<b>Receptors or targets</b>
Risk of airborne dust, fibres, powders or particulates	Release to air either directly from wastes exhibiting these properties or as a result of waste handling activities on the site	People Properties Ecosystems
<b>Simple risk assessment</b>		
<p>Waste exhibiting these properties present risks of:</p> <ul style="list-style-type: none"> <li>• Environmental damage due to dust fallout smothering effects</li> <li>• Harm to health through inhalation</li> <li>• Damage to property and loss of amenity caused by dust deposition</li> </ul> <p>These risks will be adequately controlled through primary and residual risk management provisions as specified below.</p>		
<b>Primary environmental risk management provision</b>	<b>Working Plan and licence conditions</b>	
<ol style="list-style-type: none"> <li>1. Waste acceptance procedures</li> <li>2. Waste control procedures – dusty wastes will be handled in containers providing adequate containment or aerial emissions. Dusty wastes will not be handled in moisture content is less than 10% and windspeeds are greater than 20 mph.</li> </ol>	WP/3.4 WP/2.1 WP/4.1 Procedure 2.2.4 Procedure 4.1.1	
<b>Residual environmental risk management provision to prevent &amp; minimise pollution due to failure of primary systems</b>	<b>Working Plan and licence conditions</b>	
Monitoring of visible aerial emissions and where appropriate either cessation of dusty activities during time of wind speed in excess of 20 mph or water spray/misting will be used to dampen down any potentially dusty wastes.	WP/4.1	

<b>Table WP A2: Light waste which are likely to give rise to significant quantities of litter</b>		
<b>Risk phrases</b>	<b>Hazardous event &amp; Pathway</b>	<b>Receptors or targets</b>
Risk of windborne litter	Release of litter via the atmosphere beyond site boundary	People Properties Ecosystems
<b>Simple risk assessment</b>		
<p>Waste exhibiting these properties present risks of:</p> <ul style="list-style-type: none"> <li>• Loss of amenity caused by litter</li> <li>• Damage to property (e.g. death of animals grazing on fields, traffic accidents)</li> <li>• Damage to the environment</li> </ul> <p>These risks will be adequately controlled through primary and residual risk management provisions as specified below.</p>		
<b>Primary environmental risk management provision</b>		<b>Working Plan and licence conditions</b>
<ol style="list-style-type: none"> <li>1. Waste acceptance procedures</li> <li>2. Waste control procedures – dusty wastes will be handled in containers providing adequate containment or aerial emissions. Dusty wastes will not be handled in moisture content is less than 10% and windspeeds are greater than 20 mph.</li> </ol>		WP/3.4 WP/2.1 WP/4.1 Procedure 2.2.4 Procedure 4.1.1
<b>Residual environmental risk management provision to prevent &amp; minimise pollution due to failure of primary systems</b>		<b>Working Plan and licence conditions</b>
Monitoring of visible aerial emissions and where appropriate either cessation of dusty activities during time of wind speed in excess of 20 mph or water spray/misting will be used to dampen down any potentially dusty wastes.		WP/4.1

<b>Table WP A3: Solid waste which are likely to produce contaminated or polluting runoff</b>		
<b>Risk phrases</b>	<b>Hazardous event &amp; Pathway</b>	<b>Receptors or targets</b>
Risk of generation of polluted surface water runoff	Release of contaminated site drainage to a controlled water	Surface water Ecosystems
<b>Simple risk assessment</b>		
<p>Most of the wastes accepted will not be likely to pose a hazard of polluted runoff with the exception of suspended solids is a skip contains an accumulation of rainfall or if the load contains illegally deposited liquid waste, such as oil.</p> <p>These risks will be adequately controlled through primary and residual risk management provisions as specified below.</p>		
<b>Primary environmental risk management provision</b>		<b>Working Plan and licence conditions</b>
<ol style="list-style-type: none"> <li>1. Engineered site containment and drainage system</li> <li>2. Waste control procedures – maintenance of the inceptor and silt trap system and provision of adequate emergency response plan and materials to absorb polluting liquid spillages and contain site drainage system</li> </ol>		WP/2.1  Procedure 12.1.1
<b>Residual environmental risk management provision to prevent &amp; minimise pollution due to failure of primary systems</b>		<b>Working Plan and licence conditions</b>
Monitoring of site drainage systems.		WP/4.3

<b>Table WP A4: Combustable wastes (wood, cardboard, paper, plastic) which are capable of self-sustaining combustion once ignited</b>		
<b>Risk phrases</b>	<b>Hazardous event &amp; Pathway</b>	<b>Receptors or targets</b>
Risk of deliberate or accidental combustion	Fire leading to direct damage to health and safety and release of polluting materials to the environment.	People Atmosphere Surface water Ecosystems
<b>Simple risk assessment</b>		
<p>These waste present recognisable risks of fire leading to:</p> <ul style="list-style-type: none"> <li>• Loss of amenity due to smoke and fumes</li> <li>• Damage to aquatic systems due to contaminated fire fighting runoff</li> <li>• Generation of greenhouse gases and air pollutants</li> </ul> <p>These risks will be adequately controlled through primary and residual risk management provisions as specified below.</p>		
<b>Primary environmental risk management provision</b>	<b>Working Plan and licence conditions</b>	
1. Segregated containment for plastics wastes in a dedicated skip placed upon the impermeable concrete pad.	WP/3.6	
2. Emergency response plan and provision of suitable ABC powder fire fighting equipment on-site.	WP/3.3 Procedure 12.1.1	
<b>Residual environmental risk management provision to prevent &amp; minimise pollution due to failure of primary systems</b>	<b>Working Plan and licence conditions</b>	
Fire prohibition and measures to prevent firewater entering the drainage ditch.	WP/3.3 Procedure 12.1.1	

<b>Table WP A5: Wastes or operations which are likely to give rise to mud or debris</b>		
<b>Risk phrases</b>	<b>Hazardous event &amp; Pathway</b>	<b>Receptors or targets</b>
Risk of mud or debris accumulation outside of the site boundary.	Mud or debris being deposited on the lane.	People Property
<b>Simple risk assessment</b>		
<p>The handling of inert demolition and construction waste may give rise to a risk of mud or debris being deposited outside of the boundary leading to:</p> <ul style="list-style-type: none"> <li>• Injury or damage to people or vehicles using the highway</li> <li>• Reducing amenity value</li> </ul> <p>These risks will be adequately controlled through primary and residual risk management provisions as specified below.</p>		
<b>Primary environmental risk management provision</b>	<b>Working Plan and licence conditions</b>	
<ol style="list-style-type: none"> <li>1. Carrying out activities involving vehicles on areas of hardstanding.</li> <li>2. Securing of load and cleaning of vehicles</li> <li>3. Site housekeeping and inspection.</li> </ol>	WP/3.1 WP/3.2 Procedure 2.2.4 Procedure 4.1.9 Procedure 9.1.1	
<b>Residual environmental risk management provision to prevent &amp; minimise pollution due to failure of primary systems</b>	<b>Working Plan and licence conditions</b>	
Cleansing of roads and vehicles in event of problems being identified.	WP/3.2	

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## **WP/10            Plans**

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