

**Street Fuel Ltd,
Beth 6 Basin 3
Chatham Dockyard
Chatham ME4 4SR**

NOISE and VIBRATION MANAGEMENT PLAN

Permit No. EPR/XP3598XP

Global Waste Technical Services Ltd

Global solutions... any waste, anywhere...

Revision 1.0 May 2013

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1.0 Background

- 1.1 The original site permit was issued in 2006 to accept mainly paper and cardboard and a variation added in 2010 to accept additional waste codes. Permit number EPR/NP3490EE. The permit allows the handling of not more than 280,000 tonnes of a wide range of wastes per annum. The site is permitted to handle up to 20000 tonnes at any one time.
- 1.2 The facility handles five principle waste streams:
1. Mixed commercial and industrial wastes,
 2. Mixed construction and demolition wastes,
 3. Segregated paper wood and cardboard,
 4. Municipal mixed recyclables
- 1.3 The permit conditions require that degradable household, commercial and industrial wastes must be processed within 24 hours of receipt.
- 1.4 Condition 3.3 of the permit addresses the control of noise and vibrations. It states:
- 3.3.1 Emissions from the activities shall be free from noise and vibration at levels likely to cause pollution outside the site, as perceived by an authorised officer of the agency, unless the licence holder has used appropriate measures to prevent or where not practicable, to minimise, the noise and vibration*
- 1.5 The draft EMS (operational techniques) is attached as Appendix 1
- 1.6 The nearest residential properties are to the western side of the site, which is about 400 metres from the site and separated from it by open grassland
- 1.7 An analysis of the nature of the complaints based on the EA's compliance assessment /site inspection reports is contained in Appendix 2. In order to address these complaints the Environment Agency has requested that the Company submit for approval a Noise and Vibration management plan to be implemented forthwith.
- 1.8 Discussions have taken place with the Environment Agency regarding the physical and procedural improvements necessary to prevent, or where this is not practicable, to minimise the odour generation.
- 1.9 The aim of this noise and vibration management plan is to ensure that this pollution is controlled or eliminated so as not to materially affect the enjoyment of neighbouring properties or cause harm or offence or reduce their legitimate use of the environment. This noise and vibration management plan is intended to be a working document with the specific aim of ensuring that:
- This nuisance is primarily controlled at source by good operational practices,
 - all appropriate measures are taken to prevent or where that is not reasonably practical, to reduce pollutant emissions from the facility at nearby sensitive receptors,

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- appropriate monitoring of nuisance takes place,
- actions, contingencies and responsibilities are clearly specified to address problems should they arise,
- regular reviews of the effectiveness of the nuisance control measures take place.

2.0 Description of Site and waste handling processes

Site overview

2.1 The site comprises a waste recycling and transfer facility Chatham Dockyard. It is located on Basin 3 of the dockyard. The site extends to just under 2.7 of a hectare.

The surrounding area and dust sensitive receptors

2.2 The site is bounded to the north by open rough ground. To the south, are basin 3 and then industrial and warehousing areas. To the east, the site has warehouses and then to the river Medway and to the west residential property 400metre away across grass land.

Description of site activities

2.3 The facility comprises a waste recycling and transfer operation handling the waste streams set out in paragraph 1.2 above. The principle waste handling operations take place within the waste handling building. This building measures 50 metres x 50 metres x 12 metres to the eaves.

2.4 Vehicles delivering waste to the site report to the weighbridge office where the consignment is weighed and recorded, and the appropriate documentation exchanged.

2.5 All incoming wastes received at the site are subjected to a documented and recorded inspection procedure to confirm the acceptance or rejection of the waste. This constitutes a visual check to confirm that a waste is the same as that which is described in the accompanying documents.

2.6 Once the waste reception, inspection and acceptance procedures have been completed at the weighbridge, waste delivery vehicles are directed to the material recycling building. On depositing in the reception bays the loader driver spreads the load for a further inspection to ensure compliance with the site permit.

2.7 Any loads of waste found on inspection at the weighbridge to not conform with the permit are not be permitted to proceed beyond the waste reception area. Drivers will be directed to remove the waste to a suitable facility for disposal.

2.8 If non-permitted wastes are discovered amongst a load of deposited waste in the material recycling building, the material is isolated. The waste will either be:

- Re-loaded into the delivery vehicle,
- Loaded into an isolation container for subsequent removal from site and disposal at an appropriately permitted facility,
- Otherwise dealt with in accordance with procedures discussed, and agreed with the Agency.

Principle waste handling and treatment processes

- 2.9 Two principle activities take place within the building:
- The importation unloading and physical sorting of general mixed commercial and industrial wastes,
 - The importation of mixed commercial and industrial recycling residues suitable for the manufacture of refuse derived fuel by shedding and screening.
- 2.10 In addition to the waste handling activities that take place within the main building, two additional waste handling activities take place within the yard area:
- The storage and sorting of paper and card,
 - The storage/bulking of mixed recyclable for baling for export
- 2.11 Waste is delivered to the site principally in bulk vehicles. It is removed from the site principally in bulkers.

Principle noise sources – on site

- 2.12 There is the potential for noise emissions to arise from the operation of the facility as described above. The application of good management procedures would, however, be capable of eliminating and minimising emissions to an acceptable level. The main sources of noise within the facility are as follows:
- Loading and unloading of vehicles
 - Moving the waste to their suitable points
 - Shredding, tromelling and baling of the waste

3.0 Noise and Vibration Control during normal operations***General***

- 3.1 The application of good working practices and process control is of fundamental importance in eliminating and minimising the quantities of noise generated on site and their subsequent release to atmosphere. This approach is preferred as it is much more difficult to reduce noise impact through improving atmospheric dispersion.
- 3.2 The overall aim in the operation is to:
- prevent the formation or emission of noise in the first place;
 - where this is not practicable, minimise the release of noise pollutants to abate excessive emissions;
- 3.3 A number of control techniques have been included within the design of the facility, in order to ensure the most effective. The measures employed include:
- regular maintenance of the machinery and other plant on site to manufactures specification

4.0 Routine Monitoring, Recording and Reporting

General

- 4.1 This section of the N&VMP sets out the monitoring procedures that will be implemented, during normal operations, to assess the effectiveness of operational practices to prevent and contain noise and vibration, and to assess the nature and extent of an noise problem should it arise.

Overview of Monitoring Plan

- 4.2 The monitoring of noise emissions from the facility will be undertaken in order to ensure releases do not result in noise nuisance at sensitive receptors. This monitoring includes both emissions monitoring of noise and inspections of the processes, buildings and equipment to check that emissions are being contained and controlled to meet the accepted standards of good practice in relevant guidance.
- 4.3 In order to evaluate the performance of control techniques and abatement processes in use at the facility, the Company will monitor noise in the following ways:
- a daily programme of field measurements.
 - monitoring of complaints and other forms of community feedback;
- 4.4 The following parts of this section of the OMP give further detail on how this monitoring would be carried out.

Complaints Monitoring

- 4.5 Complaint data is recognised by the Environment Agency as the single most important tool for assessing the overall level of noise and vibration impacts experienced by members of the public at locations outside the site boundary. It is therefore vital to record and act upon complaints received, and communicate the outcome of investigations to complainants.
- 4.6 The Company will implement a system of complaints monitoring and analysis. Complaints will be collected, registered and validated as described in Section 5 of this N&VMP.

Odour Diaries and Community Surveys

- 4.7 The Company recognises that there is the potential for circumstances to arise where noise complaints from community members contradict the results of the daily monitoring programme, due to the 'adaptation' of site based staff to noise released from the facility. Where it is found that this occurs over an extended period of time, consideration would be given to engaging members of the public in key locations to undertake a period of community monitoring in order to evaluate and optimise the performance of the routine sniff testing programme. The community monitoring programme would take the form of participation in off-site walkover surveys and the keeping of odour diaries, using the standard form in Appendix 1

Recording of results, reporting and actions***Recording of results***

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4.8 The Company will maintain records of all monitoring carried out under this N&VMP. The records will be retained, as required by the Environmental Permit

Reporting

4.9 In addition to implementing the reporting requirements for monitoring, as set out within the Environmental Permit, individual reports of complaints will be notified to the EA immediately after receipt, as detailed in Section 5.

Actions in the Event of Abnormal Emissions

4.10 In the event that monitoring indicates that abnormal emissions from the facility are taking place, the site management would take the following actions:

- check relevant machinery in order to identify possible cause of the abnormal emission.
- cease the activity causing the abnormal situation, if necessary;
- if possible, take immediate steps to eliminate the cause of the abnormal situation.
- record response and remedial action taken; and
- Follow internal procedures to advise of possible complaints with details of the problem.

5.0 Document Updates and Reviews / Management

General

5.1 This section of the N&VMP provides information on:

- staffing responsibilities;
- staff training;
- complaint management, investigation and resolution procedures;
- provision of a complaints telephone line; and communications with external stakeholders.

Roles and Responsibilities

5.2 The Company is committed to managing effectively the off-site impacts of noise from the facility. This commitment extends from director level. This section describes the responsibility for the management and operation of the facility.

5.3 The company has appointed an operations manager with the executive authority and responsibility for implementing its management system. Work instructions, job descriptions and procedures exist for critical areas of the Company's activity and have been issued to or made available to personnel responsible for undertaking these tasks.

5.4 The Company has a well-defined and formally documented management structure for managing the impacts of noise from the facility. It is the responsibility of the operations

manager, with the support of the environmental professionals where necessary, to identify environmental risks that are relevant to the site and determine if a particular activity or service is environmentally significant. Once identified, it is the responsibility of the operations manager to highlight the significant aspects to all relevant employees and contractors. The operations manager is also responsible for monitoring and managing all activities under the Company's control to improve environmental performance.

5.5 Further information on the role of staff members and responsibility for noise management is given below:

- The facility is the responsibility of the Operations director of the Company who is located on site
- The facility has a dedicated Site Manager who has overall responsibility for the operation of the site.
- Routine preventative maintenance and reactive breakdown maintenance is the responsibility of the Operations Manager
- The facility site manager, who reports to the Operations director, is responsible for the site operatives.
- During night hours and weekends, a member of staff is available on-call.
- Operational staff members at the facility site are responsible for maintaining an awareness of general process performance during their day-to-day activities on the site. Staff are instructed to note and observe any unusual odour occurrences and to report these to the Operations Manager without delay.
- Operations director reports serious issues to the group environmental manager who liaises with the directors at their weekly meetings, that involves the operations director and the site manager to discuss complaints and issues arising. Relevant instructions are then relayed to the site operatives through the site manager.

Management Tree

Directors

Group Environmental Manager

Site Manager

Site operatives

Training and Competency of Operational Staff at the Facility

5.6 All staff at the facility are made fully aware of the need to be constantly vigilant with regard to site odour control and management procedures. Staff responsible for the operation,

maintenance or repair of noise-critical plant will be trained and competent. Records will be maintained (documented training records) demonstrating compliance with this. In order to minimise risk of emissions, particular emphasis will be given during training to:

- general awareness of responsibilities for avoiding noise nuisance;
- actions to minimise emissions during abnormal conditions

5.7 Management will maintain a statement of training requirements for each operational post and keep a record of the training received by each person whose actions may have an impact on the environment.

5.8 The staff will receive regular refresher training.

Complaints Handling and Communications

5.9 In the event that an noise complaint is received, it is important that it is properly and systematically dealt with, and acted upon.

5.10 The Company will maintain a register of all complaints and in all cases the operations manager shall ensure that all complaints have been adequately handled and that any measures necessary to prevent a recurrence have been put in place.

5.11 Administrative arrangements will be put in place for the facility to efficiently record complaints, act on them where necessary, and to produce summary reports on the levels of complaints and what this means.

Publicising contact details for odour complaints

5.12 Members of the public are able to contact the Company with any odour complaints about the facility by the following means:

- By telephone – the contact number 07810825557 will normally be manned from Monday to Friday between the hours of 07:00 and 17:00. Outside of these hours, and on infrequent occasions during the above hours when an immediate reply cannot be made, there will be an answer phone service.
- By email to environment@streetfuel.co.uk

5.13 These methods of contacting the Company will be displayed at the site and shown on the company website.

5.14 Once a complaint has been received and the details collected, the complaint must be processed. This involves the actions described below.

Complaint recording

5.15 The Company will maintain a record of all complaints received. In the event that the Company receives a complaint alleging potential odour nuisance from the facility:

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- the complaint will be fed into the registration system;
- complaint data will be recorded in a systematic way, enabling comparison with standard odour descriptors, with wind direction and with site work activities.

5.16 The facility complaints register will be inspected on a monthly basis by the Operations Manager to obtain the data necessary for complaints monitoring and analysis. The results of this complaints monitoring and analysis will be reported as described in Section 4.

Collecting the relevant complaint details

5.17 Wherever possible, the following minimum information will be collected for each complaint:

- the time and date when the offensive noise was observed;
- the location where the offensive noise was observed, e.g. postal address, grid reference) and its sensitivity;
- the Complainant's description of noise. This should include a subjective description of all the factors necessary to make an assessment of the impact of the noise, including intensity, character, relative unpleasantness (either pleasant, unpleasant or neutral), frequency and duration;
- the identity of the complainant, if possible, to assess the repeated nature of complaints;
- the residential address of the complainant; and
- any other information the complainant can offer on activities at the alleged noise source.

5.18 It is also necessary to collect (by observation or further investigation) the following additional information to allow subsequent analysis and collation of complaints:

- wind direction and speed, and at the time of complaint; and any process incidents at the time of complaint.
- other off-site activities ongoing at the time, such as associated with the adjoining sites.

5.19 A standardised form (based on that used by the Environment Agency in its Consultation Draft H4 technical guidance note) is used for recording this information and entering it on the registration system. (see Appendix 3)

Investigation of noise Complaints

5.20 This response procedure sets out what investigative actions will be taken in response to a complaint. The aim of the investigative actions will be to establish:

- the source of the noise complaint; and
- the impact of the noise.

Complaint screening

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- 5.21 The investigation will start with an initial screening of the complaint. If the screening process fails to confirm the odour incident, then the investigation will stop at that point. If the screening process confirms the nuisance incident, then a more detailed investigation is carried out.
- 5.22 The object of the initial screening is to quickly screen out those odour complaints that are unlikely to be due to the facility, perhaps because they result from some other activities in the area.
- 5.23 The initial screening exercise will consider the following:
- knowledge of potential sources at the facility (including work activities in progress, any technical problems, etc);
 - knowledge of potential sources in the locality other than the facility, such as those listed in Section 2.4;
 - wind direction at the time of the alleged odour episode;
 - distance of the complainant from site; and
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- 5.24 The Company will liaise with local stakeholders (including the complainant) and inform them on the outcome of the screening assessment of the complaint and whether or not any action is to be

Further investigation of the complaint

- 5.25 If the initial screening concludes that the facility could be the source of the noise complaint, then further investigation will be carried out, which will either 'confirm' and 'further characterise' the odour incident as due to the facility, or it will 'fail to confirm' the incident.
- 5.26 Further investigation will be by means of a graded response, designed to answer the questions:
- can the source of the episode be linked to the facility?; and
 - What is the scale of the impact?

Communicating with the Environment Agency

- 5.27 In the event that any complaint is made by a member of the public about any matter associated with the facility, the Company will provide information on the nature and outcome of the complaint to the EA.

Communicating with complainants

- 5.28 In the case of answer phone messages and complaints submitted by email or by letter, an acknowledgement and initial response will be given by telephone or by email within two working days, provided that telephone or email contact details have been given by the complainant. Where complaints cannot be resolved on initial contact and further investigations are required, a written response will be made within 10 working days of submission of the complaint.

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- 5.29 The primary reasons for further investigation of complaints are to assess potential nuisance and identify the likely cause and source of the noise so that nuisance can be reduced or stopped. In the case of further investigations, the Company will communicate to the complainant the course of actions likely to be taken so as to ensure that there is transparency and also to establish at the outset clear targets and goals for determining the success of any control measures.
- 5.30 The level of annoyance associated with noise can often be reduced if affected individuals are provided with credible information about what they are smelling, the process that generates the odours, any factors affecting dispersion, what health impacts might be associated with the odour, what efforts are being undertaken to control odours and what is being done in response to their complaint. These actions can help affected individuals to moderate their own emotions of powerlessness and fear which may be exacerbated by odour. Liaison with the local community, offering credible reassurance and taking complaints seriously are often effective means of mitigating odour nuisance.

N&VMP Update and Review

- 5.31 The periodic review and update of the N&VMP will be in line with the recommendations of the EA noise and vibration Guidance, and this will take place on an annual basis, as a minimum.
- 5.32 However, the N&VMP is intended to be a live document which serves as a reference during day to- day operations, and as such would be updated on a more frequent basis should the following occur:
- significant changes are made to the plant or operational practices;
 - there is a change to the management structure, designation of responsibility or training provision;
 - the Environment Agency requests that the N&VMP is updated, in their role as regulator; or
 - complaints are received, which on subsequent investigation result in the identification of further control measures or remedial action, in addition to those set out within this N&VMP.
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The following forms will be used in conjunction with the Odour management plan and the dust management plan

Odour/Dust noise report form					Date
Time of test					
Location of test e.g. street name etc					
Weather conditions (dry, rain, fog, snow etc):					
Temperature (very warm, warm, mild, cold, or degrees if known)					
Wind strength (none, light, steady, strong, gusting)					
Wind direction (e.g. from NE)					
Intensity (see below)					
Duration (of test)					
Constant or intermittent in this period					
What does it smell like?					
Location sensitivity (see below)					
Is the source evident?					
Any other comments or observations					

Sketch a plan of where the tests were taken, the potential source(s).

North



Need to add site layout plan

<p>Intensity (Detectability)</p> <ul style="list-style-type: none"> 1 No detectable odour 2 Faint odour (barely detectable, need to stand still and inhale facing into the wind) 3 Moderate odour (odour easily detected while walking & breathing normally) 4 Strong odour 5 Very strong odour (possibly causing nausea depending on the type of odour) 	<p>Location sensitivity where odour detected</p> <ul style="list-style-type: none"> 0 not detectable 1 Remote (no housing, commercial/industrial premises or public area within 500m) 2 Low sensitivity (no housing, etc. within 100m of area affected by odour) 3 Moderate sensitivity (housing, etc. within 100m of area affected by odour) 4 High sensitivity (housing, etc. within area affected by odour) 5 Extra sensitive (complaints arising from residents within area affected by odour)
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Form HINC 2

Odour/ Dust noise Complaint Report Form		
Time and date of complaint:	Name and address of complainant:	
Telephone number of complainant:		
Date of odour:		
Time of odour:		
Location of odour, if not at above address:		
Weather conditions (i.e., dry, rain, fog, snow):		
Temperature (very warm, warm, mild, cold or degrees if known):		
Wind strength (none, light, steady, strong, gusting):		
Wind direction (eg from NE):		
Complainant's description of odour:		
○ What does it smell like?		
○ Intensity (see below):		
○ Duration (time):		
○ Constant or intermittent in this period:		
○ Does the complainant have any other comments about the odour?		
Are there any other complaints relating to the installation, or to that location? (either previously or relating to the same exposure):		
Any other relevant information:		
Do you accept that odour likely to be from your activities?		
What was happening on site at the time the odour occurred?		
Operating conditions at time the odour occurred (eg flow rate, pressure at inlet and pressure at outlet):		
Actions taken:		
Form completed by:	Date	Signed

Intensity (Detectability)

- 1 No detectable odour
- 2 Faint odour (barely detectable, need to stand still and inhale facing into the wind)
- 3 Moderate odour (odour easily detected while walking & breathing normally)
- 4 Strong odour
- 5 Very strong odour (possibly causing nausea depending on the type of odour)

Form HINC 3		Odour / Dust noise		Sheet No
Diary				
Name:	Address:			
Telephone Number:				

Date of odour:						
Time of odour:						
Location of odour, if not at above address:						
Weather conditions (dry, rain, fog, snow etc):						
Temperature (very warm, warm, mild, cold or degrees if known):						
Wind strength (none, light, steady, strong, gusting):						
Wind direction (eg from NE):						
What does it smell like? How unpleasant is it? Do you consider this smell offensive?						
Intensity – How strong was it? (see below 1-5):						
How long did go on for? (time):						
Was it constant or intermittent in this period:						
What do believe the source/cause to be?						
Any actions taken or other comments:						

Intensity (Detectability)

- 1 No detectable odour
- 2 Faint odour (barely detectable, need to stand still and inhale facing into the wind)
- 3 Moderate odour (odour easily detected while walking & breathing normally)

4 Strong odour

5 Very strong odour (possibly causing nausea depending on the type of odour)

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