

GUIDE TO THE PREPARATION OF A WORKING PLAN **SCRAPYARD / ELV FACILITY**

A working plan is an essential document and consists of a written statement accompanied by plans, drawings and specifications detailing how the site is to be designed, engineered, operated, monitored and restored. The working plan is referred to in waste management licence conditions and the licence holder may only vary it by notification to, and in some respects with the prior consent of, SEPA. SEPA's [Guide to Waste Management Licensing](#) gives further guidance on waste management licensing and working plans.

It is essential that applicants discuss the need for site engineering and development works with SEPA at an early stage of preparing a licence application. The site will require engineered design features such as gates, fences, drainage and concrete hardstanding. An indication of the engineering works that will be required is given in this Guidance Note.

The application of Quality Assurance and Quality Control procedures form an important part of any waste management practice and applicants should bear this in mind when preparing their working plan. This is particularly applicable to the installation of site infrastructure such as concrete surfacing and site drainage.

The Working Plan is likely to require amendment as the site develops, it will therefore be helpful to write the statement in sections with numbered paragraphs and pages, submitted in loose leaf form so that subsequent approved changes are easier to incorporate.

The information which must be included in the working plan is as follows, and should correlate with plans as listed in paragraphs 2.1 - 2.3 below:

SEPA suggests that the Working Plan follows the format outlined below.

1. WRITTEN STATEMENT

The written statement forms an important part of the working plan. It must describe clearly and unambiguously all aspects of the operation of the site. A correctly written statement should contain sufficient information to enable anyone unconnected with the site to understand how it will be operated.

1.1 General Considerations

General details of the site should include;

- a) A brief history of the site giving its previous uses, including any previous waste management activities.
- b) The proposed operating hours at the site including the proposals for Bank Holiday and other public holiday working, for accepting, treating and removing waste and the maintenance of plant, buildings and equipment.
- c) The types of waste that will be accepted and the maximum quantity of each type of waste that will be accepted, stored and treated (as appropriate) each day. A throughput rate for wastes should also be indicated.

- d) The number of staff to be employed on the site and the minimum number of people required to operate the site. Details should be provided of how the technically competent management will control the site including detail on those involved and a copy of the relevant certification / references.

1.2 Site Infrastructure

The standard and location of the following infrastructure should be detailed:

Fencing

The license holder should provide perimeter fencing or some other means of preventing unauthorised or accidental access.

Surfaces

To prevent the pollution of water, areas used for the storage of contaminated materials including undrained vehicles, dismantled engines and transmissions, the processing of contaminated materials, the draining of vehicles and vehicle dismantling must take place on an impermeable pavement, i.e. concrete. Specifications of thickness, quality and falls to the drainage system must be given.

To avoid liquids escaping from the perimeter of the concrete, raised kerbs may be required to bund the areas for complete containment. Internal concreted areas may require sealing at doorways by small barriers, if the fall directs liquids to the doorway.

Hardcore areas can be utilised to store fully depolluted vehicles.

Drainage

To prevent the pollution of water, concreted surfaces which are not under cover must be drained to a sump or to an oil/water interceptor with final discharge to a sewer, soakaway or watercourse under consent from SEPA or Scottish Water, as appropriate.

Other Infrastructure

Where appropriate, the standard and location of the following infrastructure should be detailed;

- a) Site roads
- b) Weighbridge
- c) wheel cleaning facilities
- d) fuel and waste storage tanks and associated bunds
- e) waste storage areas
- f) services (water, electricity, telephone etc.)
- g) lighting.

If it is considered more convenient, buildings and other infrastructure can be detailed as annotations on the site plan(s).

The working plan should make it clear whether the waste storage area is in the open air, covered, enclosed, or in a building, with details of any structure.

1.3 Waste Reception

Detailed explanations are required for the procedures for accepting materials, for the safe handling of materials and for dealing with incidents regarding unauthorised wastes, plant breakdown, accidents, spillages, and fire.

A visual check on incoming materials must be undertaken and recorded with details of quantity, nature and origin to ensure the types and quantities of waste as well as the storage capacity of the site are in accordance with licence conditions. For fine materials (residues and oily swarf) acceptance may require further analysis. Any unsuitable materials, accepted by mistake, must be segregated, securely stored and removed as soon as practicable. On removal the quantity, nature, process and destination must be recorded. A summary of all materials accepted and removed will be required to be sent to SEPA at a frequency and format specified in the licence.

The Working Plan must give a full description of how the above requirements will be met.

1.4 Site Operations

The working Plan should provide information on the day-to-day operations of the site, including:

- a) The types of treatment processes to be carried out and the location at which they will be undertaken.
- b) The maximum time that waste will be stored at the facility. The working plan must specify how wastes are to be removed from the site within an acceptable timescale.
- c) The type, location and size of any waste handling machinery and details of how it is to be used.
- d) The arrangements for the storage, handling and disposal of any residues or by-products produced at the site.

Particular consideration should be given to the following issues:

Storage Height

To prevent detriment to the amenities of the locality and safe working conditions the height of stacked materials should follow planning permission restrictions or Health and Safety Executive guidelines and should be no higher than the boundary fence. Purpose built stacking frames may allow higher stacking with safe access.

Storage of Contaminated Materials

To prevent pollution of the environment batteries and oily materials (swarf containing soluble oils) must be stored in covered leakproof containers sited on concrete or in a concrete bunded area with a sump completely isolated from any interceptor draining to sewer or soakaway. Batteries must not be drained on site unless specifically permitted to do so.

Storage of Liquids

To prevent the pollution of the environment from spillages, liquids should be stored in labelled containers sited on impervious bases and surrounded by impervious bund walls with a capacity of 110% of the volume of the largest tank. Off loading valves and ventpipes must be sited within the bunded area. The capacity of the bund must be maintained with any liquids being removed from a sump at the lowest point.

The operator must make adequate provisions for the maintenance and upkeep of the site and all plant and equipment. The working plan must provide full and precise details of such maintenance provisions to satisfy SEPA of their suitability. Details of inspections of infrastructure and storage areas should also be stated.

1.5 Pollution Control

This section should detail the measures to be taken to monitor and/or control the following;

- a) Vermin
- b) Insects
- c) Noise
- d) Dust
- e) Spillages
- f) Odours
- g) Mud
- h) Litter
- i) Fires

1.6 Site Completion

The proposals for restoring the site after operations have been concluded should be included, where applicable.

1.7 Monitoring

This section should include details of any monitoring it is proposed to carry out, including the location and frequency of monitoring and the methodology of sampling and analysis.

1.8 Records

This section should include details of the manner in which records relating to the site activities will be kept. In particular the system for recording the types and quantities of waste received, processed and removed from the site should be detailed.

2. PLANS

Where indicated the scales suggested for the following sections are strongly recommended, although in some circumstances alternative scales may be more appropriate. Applicants should discuss alternative plans or scales with SEPA prior to the submission of the application. **All plans should bear a unique identification number.**

The plans required for the Working Plan are as follows:

2.1 Site Location Plan

A plan to identify the site in comparison to the surrounding area. This should be A4 in size and usually at a scale of 1:1250. It must show the area around the site to a distance of at least 250 m and include all roads, buildings and other developments.

A red line should be placed around the whole area to be licensed, and a blue line placed around any other areas of land owned or occupied by the applicant. The area to be licensed must be identical to, or fall within the boundaries of the area that has been granted, or applied for, in the planning permission, application or equivalent authorisation.

2.2 Site Operational Plan(s)

Suitable scales for this plan would be between 1:100 and 1:500 depending on the size of the facility and will show the site prior to preparation. Details that should be included are existing features and additional works to be undertaken and include such things as:

- a) existing drainage and outfalls.
- b) the location of any watercourses including any springs, seepages or wells.
- c) public services, and any other features of the site.
- d) location of discharge consents.
- e) hardstandings - locations and specification.
- f) Impermeable pavements - locations and specification.
- g) gates and boundary fencing.
- h) access and position of notice board.
- i) reception facilities, location of storage areas and bays, location of processing areas, site control office and other buildings, other fixed equipment on site such as wheel cleaner, weighbridge and secure area for gas bottles.
- j) location of all tanks and associated bunds.
- k) existing drainage layout including any interceptors and any proposals for improvement.
- l) landscaping and screening works.
- m) type of surfacing of the storage, access and operational areas.

In the interests of clarity it may be appropriate to detail the information on a series of plans.

A red line should be placed around the whole area to be licensed, and a blue line placed around any other areas of land owned or occupied by the applicant. Please check that the area outlined in red is that covered by the relevant planning permission.

2.3 Engineering Plans & Details

These give scaled details of construction and engineering features on the site. Examples of works which may require these details are:

- a) the form and construction of bunds including those for fuel, oil storage and other fluids.
- b) details of surface water drainage.
- c) form and construction of site roads.
- d) wheel wash and weighbridge facilities.

NOTE TO APPLICANTS

SEPA will usually discuss with the applicant any details in the submitted working plan which it considers to be unacceptable. If SEPA cannot be satisfied with any of the

contents of the working plan it will incorporate conditions within the waste management licence which will override the working plan in respect to those points.

License Holder's Responsibilities

Notwithstanding any requirements of SEPA for site engineering, the applicant should be aware of his responsibility for ensuring the integrity of such works. Compliance with SEPA's minimum standards **does not** remove the liability of the licence holder for any water pollution or other environmental damage which may result from the activities on site.