

## **GUIDE TO THE PREPARATION OF A WORKING PLAN WASTEWATER TREATMENT PLANTS**

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 hardstandings. 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.

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:

### **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 on 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

This section should detail all pre-development surveys and all engineering and construction work that will be required before any waste acceptance and treatment operations may commence.

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

- a) site roads
- b) boundary fencing and gates
- c) general pollution control provisions (including odour, litter, noise, etc)
- d) buildings (including laboratory facilities, where applicable)
- e) weighbridge
- f) wheel cleaning facility
- g) fuel and waste storage tanks and associated bunds
- h) drainage system
- i) site surfacing
- j) waste storage areas
- k) services (water, electricity, telephone etc)
- l) 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

A full detailed description should be given of the following points, where relevant: -

- a) Method of waste transfer and/or treatment processes, including (where appropriate) the way in which the waste is to be accepted, deposited, assessed, stored prior to treatment, treated, to what standard, what sampling/analysis is carried out and detail on any quality and assurance procedures to verify the same, storage post treatment and removal procedures.
- b) Measures taken to ensure the segregation of incompatible wastes. Applicants are advised to refer to guidance produced by the Health & Safety Executive and in particular to [HSE Guidance Note HS\(G\) 71](#).
- c) The provisions for waste to be checked to ensure it is acceptable under the terms of the licence and that it complies with any documentation accompanying the load, how the quantity is to be measured and recorded, and details of any tests carried out. A quarantine area for loads to wait whilst appropriate sampling, testing and analysis is carried out may also be necessary.

- d) The procedures to be carried out in the event of waste being delivered which is not permitted by the licence or not capable of being handled by the equipment currently available.

#### **1.4 Site Operations**

Information on the day-to-day operations should include:-

- a) The location and types of treatment processes to be carried out.
- b) The method of containment of the waste (i.e impermeable concrete tanks etc)
- c) The maximum time that waste will be stored at the facility prior to treatment. The Working Plan must specify how wastes are to be stored at the site pending treatment.
- d) If waste is to be treated and stored for sale or re-use, type and maximum quantity of reclaimed material and its storage location.
- e) The type, location and size of any waste handling plant machinery and detail of how it is to be used.
- f) Measures to warn of plant malfunctions or overflowing and the procedures to be implemented in the event of any plant or machinery breaking down or being unavailable.
- g) Any sampling and analysis to be undertaken to confirm the nature of wastes received at the site.
- h) Post treatment sampling and analysis to confirm that the treated sludge is suitable for land spreading or incineration as appropriate.
- i) The arrangements for the storage, handling and disposal of any residues or by-products produced at the site.
- j) The arrangements for traffic movements and vehicle parking during operational hours and overnight (including precautions to prevent any incident arising from parked loaded vehicles).
- k) A list of technically competent personnel.

The operator must make adequate provision 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

Details of any consents, from SEPA or Scottish Water, held to discharge to any watercourse or sewer should be appended to the Working Plan.

## 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 Survey Plan

An appropriately scaled plan to show details of the site including:-

- a) The gradient of the surface of the site.
- b) Existing drainage, sumps and outfalls.
- c) The location of any surface water features including springs and seepages.
- d) Location of previous contamination and sampling points.
- e) Public services, and any other features under, on, above or around the site.

### 2.3 Site Operational and Engineering Plan(s)

- a) Gates and boundary fencing.

- b) Details of intended drainage provisions, to include foul and surface water connections and any interceptors, sumps or settlement tanks.
- c) Access and vehicle circulation routes, form and construction of site roads.
- d) Position of notice board.
- e) Reception facilities, site control office and mess facilities, laboratory and other buildings or fixed equipment on site including wheel cleaner and weighbridge.
- f) Provision for daytime and overnight parking, including quarantine area for loads to wait whilst being checked.
- g) Location, construction, size and capacity of storage and treatment area for loads to wait whilst being checked.
- h) Waste discharge facilities (including location of machine and vehicle).
- i) Location of external lighting, water supplies, fire extinguishers etc.
- j) Areas for the storage of waste inadvertently received at the site pending removal.
- k) Location for the storage of material recovered from the waste and segregated for re-use or re-sale, if appropriate.
- l) Litter and noise abatement equipment, dust suppression or extraction equipment.
- m) Areas set aside for the storage of empty skips, if appropriate.

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

#### **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.