

Environmental Management System



ENVIRONMENTAL SERVICES

**KSD ENVIRONMENTAL
SERVICES LIMITED**

Site Name:

Old Timber Yard

Plot 4

North Quay Road

Newhaven

BN9 0AB

Environmental Permit:

GB3904MY

Version 4.0

Dated 11.01.23

Produced By:

E C S

ENVIRONMENTAL COMPLIANCE SPECIALISTS

DOCUMENT CONTROL SHEET

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|-----------------|---|
| Client: | KSD Environmental Services Limited |
| Project: | Environmental Compliance Support |
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Key Site Information

| SITE CONTACTS | Name | Office Hours (specify) | Out of hours |
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| Police, Fire Ambulance: | | 999 | 999 |
| REGULATORS | | Office Hours | Out of hours |
| Environment Agency (emergency hotline) | | 0800 80 70 60 | 0800 80 70 60 |

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1 Introduction

- 1.1.1 This Environmental Management System has been produced in accordance with Environment Agency Guidance ‘Develop a management system: environmental permits’ Last updated August 2022.

Table 1: Develop a Management System & Environmental Management System Cross Reference

| Develop a Management System Guidance Contents | Environmental Management System Sections |
|--|---|
| Site Infrastructure | Section 1.7 |
| Site Operations | Sections 3/4/5/6/7/8/9 |
| Site Equipment Maintenance Plan | Section 12 |
| Climate Change | Section 13 |
| Contingency Plan | Section 13 |
| Accident Prevention & Management Plan | Sections 14-20 |
| Complaints Procedure | Section 17 |
| Managing Staff Competence & Training Records | Sections 1.5 & 11 |
| Keeping Records | Section 10 |
| Review Your Management System | Section 21 |
| Site Closure | Section 13 |

1.2 Interpretation

- 1.2.1 ‘Management Team’ any nominated responsible person.

1.3 General Management

- 1.3.1 Activities will be operated and managed in accordance with this site-specific Environmental Management System (EMS) and the governing Environmental Permit, using sufficient competent persons and resources
- 1.3.2 All employees having duties that are or may be affected by the matters set out in this EMS will have access to a copy of this document and the governing permit. Documentation will be clearly labelled and displayed within the Site Office.

1.4 Implementation and Operation

- 1.4.1 Sufficient resources essential to the effective implementation and update of this EMS will be put in place and maintained. At least one Member of the Management Team is present when the site is operational.
- 1.4.2 Training needs have been identified so that all personnel whose work may contribute towards the safe and compliant operation of the site have received appropriate training.

1.5 Sufficient Competent Management

- 1.5.1 Sufficient competent management will be maintained, and the minimum TCM attendance requirements will be met. Attendance will be recorded in the Site Diary.
- 1.5.2 In the event that the designated TCM is absent for a period of time such that the minimum agreed attendance is unlikely to be achieved, a suitably qualified alternative will be secured.

1.6 Checking & Corrective Action

- 1.6.1 A Member of the Management Team will be responsible for handling and investigating any incidents that may result in non-compliance with this EMS, taking action to mitigate any impacts caused and for initiating and completing corrective and preventive action. Any such action will be used to inform changes in the documented procedures.

1.7 Site Infrastructure

Table 2: Site Infrastructure Provisions

| Provisions | Description |
|----------------|---|
| Drainage | Impermeable surface is laid to fall so that all surface water run-off is captured via the sealed system |
| Site Perimeter | Enclosed site perimeter, with access via main entrance door/gate. |

2 Environmental Legal Register

Table 3: Environmental Legal Register (Not an exhaustive list of requirements)

| Legislation | Summary/Obligations | Compliance Documentation Location | Responsible |
|--|--|---|-------------------------------|
| Environmental Permit | Overarching permit that stipulates the conditions by which the site must be operated to. | Copy of permit held within Office. Compliance documentation includes an Environmental Management System | Member of the Management Team |
| Waste Carriers Licence | Waste management companies moving wastes must be registered as an 'upper tier' waste carrier. | Copy of contractors' registrations held within the Office. | Member of the Management Team |
| Environmental Permitting Regulations 2016 (As Amended) | Overarching legislation for waste management facilities (i.e., requirement to have a permit & to comply with conditions). | Copy of permit held within the Office. | Member of the Management Team |
| The Waste (England and Wales) Regulations 2011 Waste Hierarchy (As Amended) | Overarching legislation for the management and handling of waste. Ensure waste is managed as far up the waste hierarchy as possible, evidence should be retained within the Company Office to support any minor deviations. | Compliance with the waste hierarchy is assured by the procedures detailed within this Environmental Management System & Duty of Care documentation. | Member of the Management Team |
| The Environmental Protection Act 1990: Copies of all non-hazardous waste Duty of Care waste transfer notes must be kept onsite for 2 years. | Overarching legislation for waste management activities. Duty of Care requirement for the movement of all waste, (not required for internal movements or movements within the same company). These must be kept for two years. | All Duty of Care waste transfer notes are held in Office for two years. | Member of the Management Team |

| | | | |
|--|--|---|-------------------------------|
| The Water Resources Act 1990 (as amended) | Overarching legislation for controlled waters. Ensure that the site does not pollute to any controlled water body; these are strict liability offences (i.e., the act alone makes a defendant guilty). | Concrete surfaced designed so that all surface water run off goes via the sealed system | Member of the Management Team |
| The Hazardous Waste Regulations 2005: <i>Hazardous Waste Consignment Notes</i> (Recommendation that the EA template for Consignment Notes is used) | Overarching legislation for wastes that are classified as hazardous. Hazardous waste must not be mixed with other hazardous waste or non-hazardous wastes. A Consignment Note must accompany all hazardous waste movements; these must be kept onsite for 3 years. | All Consignment Notes are kept for three years within the Office | Member of the Management Team |
| Landfill Tax Assessment (LOI Test) | Overarching legislation regarding the tax associated with disposing of wastes at landfill (cheaper tax for those materials that can be considered inert). | All ignition test results & audit trail documentation held in the Office (abnormal generation). | Member of the Management Team |

3 Operations

3.1 Specified Waste Management Operations

3.1.1 Waste management operations authorised within the permitted area are listed in Table 4 below.

Table 4: Specified Waste Management Operations (See Table S1.1 of Permit)

| Operational Codes | Activity |
|---|---|
| R13: Storage of waste pending any of the operations numbered R1 to R12 | Treatment operations shall be limited to: Physical treatment of waste including crushing, screening, sorting, compacting, baling, shredding, and wrapping for the purpose of disposal (no more than 50 tonnes per day) or recovery. |
| R3: Recycling/reclamation of organic substances which are not used as solvents | |
| R4: Recycling/reclamation of metals and metal compounds | |
| R5: Recycling/reclamation of other inorganic compounds | Treatment of biodegradable non-hazardous waste to be undertaken within a building with impermeable flooring and sealed drainage. |
| D15: Storage pending nay of the operations numbered D1 to D14 | Storage of biodegradable non-hazardous waste to be undertaken within a building with impermeable flooring and sealed drainage or within an area served with impermeable flooring and sealed drainage. |
| D9 Physical/Physico Treatment | |
| D14 Repackaging prior to submission to any of the operations numbered D1 to D13 | <p>The maximum quantity of asbestos waste received at the site shall not exceed 10 tonnes per day.</p> <p>The maximum quantity of asbestos waste stored at the site shall not exceed 10 tonnes.</p> <p>There shall be no treatment of asbestos waste.</p> <p>No more than a total of 50 tonnes of intact and shredded waste vehicle tyres (waste codes 16 01 03 and 19 12 04) shall be stored at the site.</p> <p>Waste types and quantities as detailed in Table S2.1.</p> |

3.2 Permitted Wastes

3.2.1 Waste types that can be received onsite are presented in Table 5 below, which is not an exhaustive list.

3.2.2 Refer to Permit for list of all waste types (EWC Codes) that can be accepted at the site).

Table 5: Permitted Waste Types (See Table S2.1 of Permit)

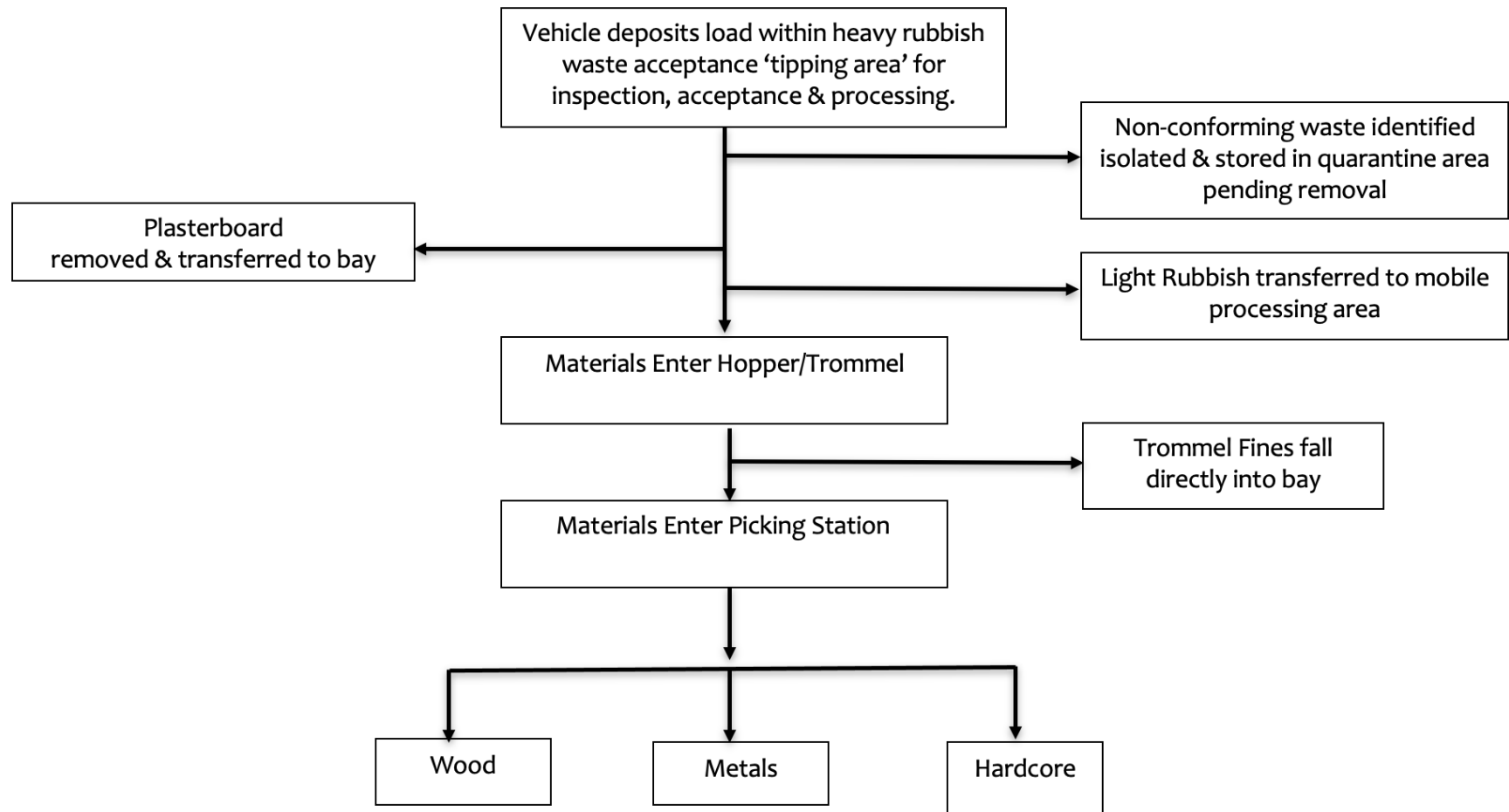
| Waste Description | Waste Category EWC Code | | | | | Handling Advisory |
|--|-------------------------|----------|----------|----------|----------|---|
| Asbestos | 17 06 05* | | | | | Potential health hazard if fibres are released |
| Cardboard/Paper | 03 03 07 | 03 03 08 | 15 01 01 | 19 12 01 | 20 01 01 | Store separately for onward management. Fire Risk Material. |
| Green Waste | 02 01 03 | | 02 01 07 | | 20 02 01 | Store separately for composting offsite. Fire/Dust/Odour Risk Material. |
| Glass | 10 11 03 | 10 11 11 | 10 11 12 | 15 01 07 | 16 01 20 | Specified Waste (some). |
| | 17 02 02 | 17 02 04 | 19 12 05 | 20 01 02 | | |
| Gypsum Plasterboard | 17 08 02 | | | | | Store separately for onward management. |
| Inert Wastes & Soils | 01 01 01 | 01 01 02 | 01 03 06 | 01 03 09 | 01 04 08 | Specified Wastes. May give rise to dust if stored outside and allowed to dry out. Dampening down during hot/dry weather with water provisions (where this is deemed necessary). |
| | 01 04 09 | 01 04 11 | 01 04 12 | 01 04 13 | 02 04 01 | |
| | 10 01 24 | 10 11 12 | 10 12 08 | 10 13 14 | 15 01 07 | |
| | 17 01 01 | 17.01.02 | 17.01.03 | 17.01.07 | 17 02 02 | |
| | 17 03 02 | 17 05 04 | 17 05 08 | 19 01 19 | 19 12 05 | |
| | 19 12 09 | 20 01 02 | 20 02 02 | | | |
| Mixed Construction & Demolition Wastes | 17 09 04 | | | | | Store separately for composting offsite. Fire/Dust/Odour Risk Material. |
| Mixed Municipal Wastes | 20 03 01 | | | | | Store separately for composting offsite. Fire/Dust/Odour Risk Material. |
| Metal Scrap (Ferrous) | 02 01 10 | 12 01 01 | 12 01 02 | 12 01 03 | 12 01 04 | Store separately for onward management. |
| | 15 01 04 | 16 01 17 | 16 01 18 | 17 04 05 | 17 04 07 | |
| | 19 01 02 | 19 10 01 | 19 10 02 | 19 12 02 | 19 12 03 | |
| | 20 01 40 | | | | | |
| Metal Scrap (Non-Ferrous) | 02 01 10 | 12 01 01 | 12 01 02 | 15 01 04 | 16 01 17 | Store separately for onward management. |
| | 17 04 05 | 17 04 07 | 19 01 02 | 19 10 01 | 19 12 02 | |
| | 20 01 40 | | | | | |
| Wood | 02 01 03 | 02 01 07 | 03 01 05 | 03 03 01 | 15 01 03 | Wood users offer higher premium for clean untreated wood such as pallets as from plywood and chipboard. Separate where possible. Fire/Dust/Odour Risk Material. |
| | 17 02 01 | 19 12 07 | 20 01 38 | 20 02 01 | | |

3.3 Waste Throughput

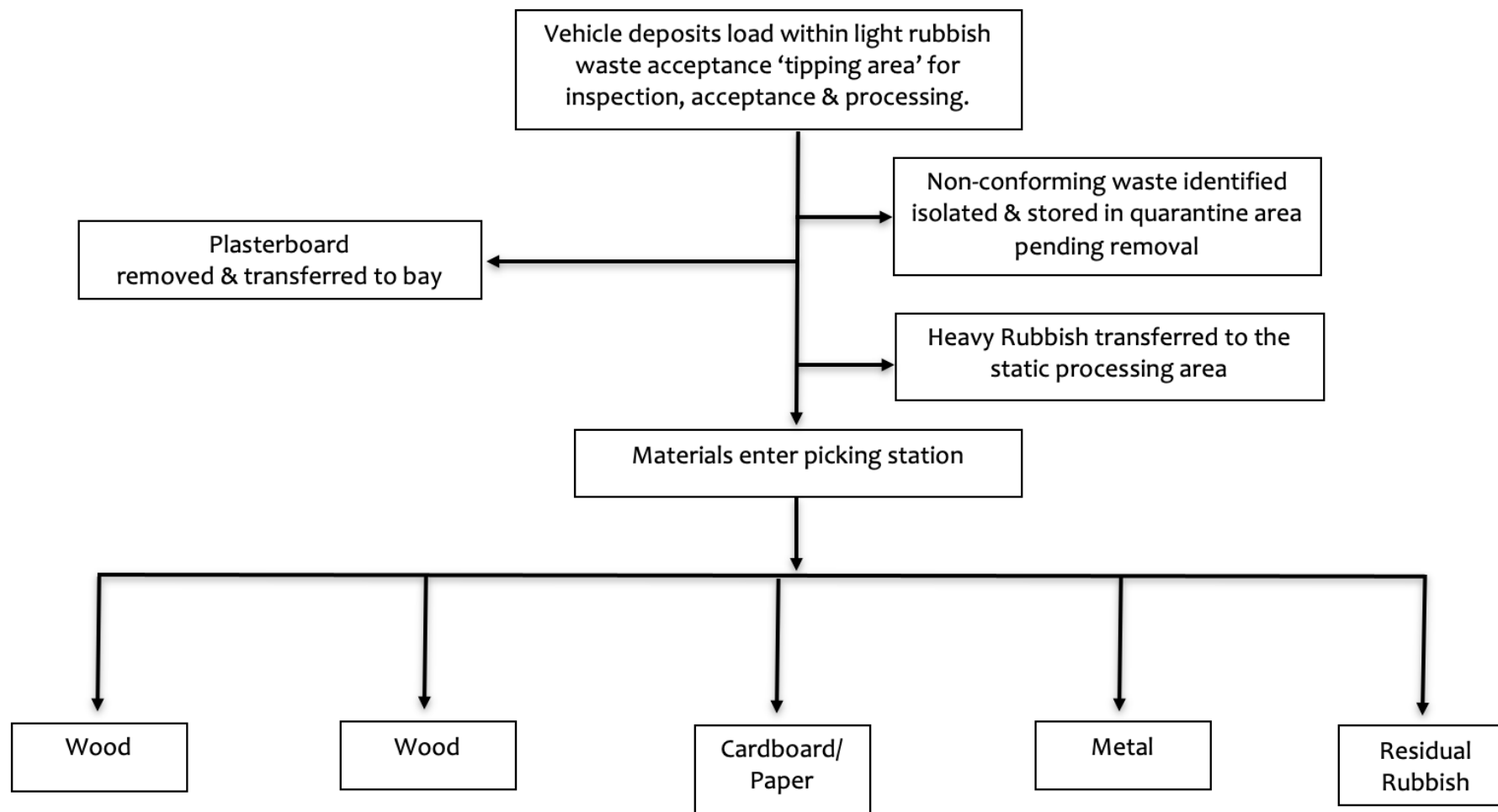
Table 6: Maximum Permitted Throughput

| Waste Category | Annual Tonnage |
|----------------|---------------------|
| To not exceed: | 150,000 (Permitted) |

4 Operational Flow Diagram (Static Plant-Heavy Wastes)



5 Operational Flow Diagram (Mobile Plant-Light Wastes)



6 Wood Waste Flow Diagram

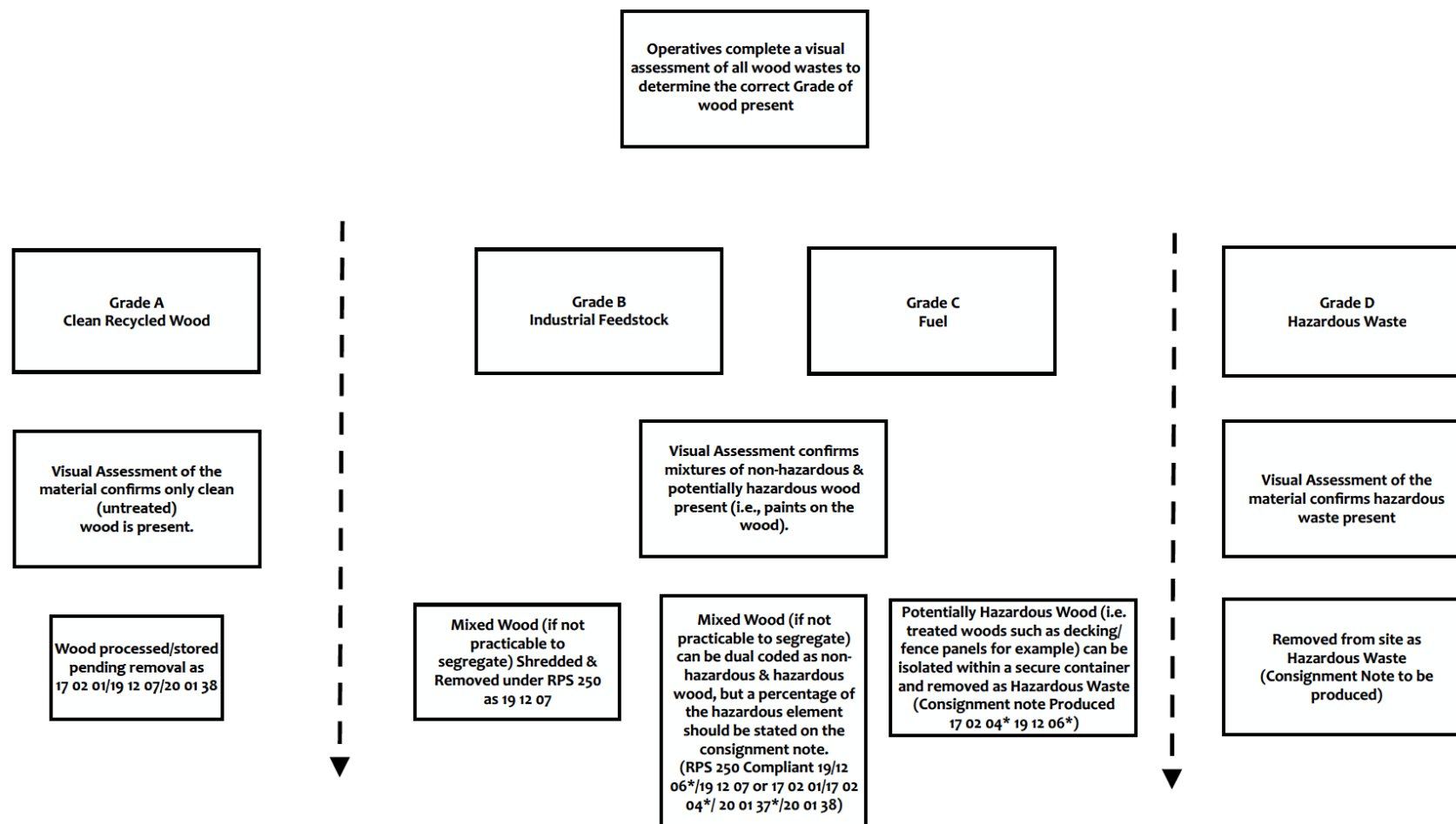


Figure 1: Waste Wood Flow Diagram

7 Waste Acceptance Procedures

7.1.1 Compliance with the permitted waste types is assured by the following measures:

1. When a skip/container is hired prohibited material is clearly stated and reflected in terms & conditions of hire;
2. When collecting the full skip/container the driver will inspect and check to see if any prohibited material is present. If it is, the customer will be notified and advised of the following course of action available:
 - a) Removed and left at the customers premises
 - b) Accepted and disposed of directly to a site permitted to accept the waste
3. On delivery to site the driver will hand all paper copies of any Duty of Care Documentation to the Weighbridge Office, whilst all electronic paperwork will be transferred to the Weighbridge Office during transportation; and
4. Once all Duty of Care Documentation has been approved the wastes will be deposited in the Waste Acceptance Area for visual inspection, acceptance & processing (machine operatives will spread out the loads to aid the visual inspection process).

7.1.2 If any prohibited materials are present the following course of action will be taken:

- a) Require the individual to load the non-permitted materials back onto the delivery vehicle; or
- b) Accept, isolate & arrange for removal to an authorised waste management facility.
- c) Under no circumstances will non-permitted wastes be retained onsite and dealt with as if it is permitted.
- d) The Agency will be notified if a delivery is rejected.

7.1.3 If the prohibited material becomes apparent only after the above waste acceptance checks have been completed the following action will be taken:

- a) The load will be isolated within the isolation facility (appropriate PPE will be worn if necessary) and removed from site to a suitably permitted facility at the earliest opportunity.
- b) In each case, the incident will be recorded in the Site Diary (taking note of the vehicle registration, date & time of the incident). If identifiable the individual will be notified of the event and reminded of the terms on which waste is accepted onto site. (It will be at the discretion of the Management Team if they wish to ban an individual/company following an incident).

- c) Under no circumstances will prohibited waste be retained onsite and dealt with as if it is permitted.
- d) The Agency will be notified if a delivery is rejected.

7.2 Rejection Procedure

- 7.2.1 Any wastes identified as being unsuitable for disposal at the site will be rejected & recorded in the Site Diary.
- 7.2.2 A record will be kept of the following pieces of information:
 - a) Date & time
 - b) Person rejecting the waste(s)
 - c) Haulier/customer name and address including carrier's number
 - d) Vehicle registration number
 - e) Procedure name and address
 - f) EWC number
 - g) Transfer Note Number
 - h) Waste Description

7.3 Fibrous Asbestos Procedure

- 7.3.1 If asbestos is detected the following procedures will be followed:
 - I. Isolate, if safe to do so while using appropriate PPE.
 - II. Dampen down utilising water provisions to prevent fibres/particulates being released.
 - III. Contact a specialist contractor to isolate/remove asbestos from site immediately.
 - IV. In the event of fibre release, the site will be evacuated until a specialist contractor has dealt with the risk. The Environment Agency and the Environmental Health Officer will be notified immediately.
 - V. Notify Regulatory Authorities when the asbestos has been removed offsite and the site has recommenced operations.
 - VI. Complete a Non-Conformance Record Form and an Accident & Incident Investigation Report.
 - VII. Provide written confirmation of the event and outcome to the Agency within 24 hours, completing from in Appendix EMS4.
 - VIII. Details of all such incidents will be recorded in the Site Diary and records of removals are kept within the site office. In each case a record of the incident will be noted including time, description, and carrier.

8 Storage Procedures

- 8.1.1 Wastes are stored within designated bays/containers/areas until sufficient quantities have accumulated to represent a load requiring removal; removals are undertaken on an ongoing basis.

9 Despatch Procedures

1. Wastes stored within bays/containers/areas will be placed within the despatch vehicle using mechanical equipment.
2. Containers will be loaded directly onto the collection vehicle.
3. Once loaded the vehicle sheeted for despatch.
4. All drivers will inspect their loads prior to leaving the site to prevent spillages of waste or debris on the entrance and exit roads of the site.

10 Duty of Care

- 10.1.1 KSD Environmental Services Limited takes its responsibilities seriously under Duty of Care & understands them to require it to:

1. Check the authorised status of all waste carriers utilised;
2. Wastes are going to a suitably authorised facility;
3. Complete compliance status checks from time to time;
4. Produce & maintain appropriate records relating to wastes received and removed.

10.2 Reporting

- 10.2.1 Within one month of the end of each quarter, all information relating to wastes accepted & removed from the site must be submitted to the Environment Agency for the previous quarter.

10.3 Notification

- 10.3.1 Notify the Environment Agency without delay in the event of detecting any of the following:
1. Any malfunction, breakdown or failure of equipment or techniques, accident or emission of a substance not controlled by an emissions limit which has caused, is causing or may cause significant pollution;
 2. The breach of a limit specified in the permit;
 3. Any significant adverse environmental effects.
- 10.3.2 The Environment Agency will be notified without delay with written confirmation (i.e., an email & telephone conversation with the local Enforcement Officer) of such incidents, which must be submitted within 24 hours.
- 10.3.3 The Environment Agency will be notified at least one month prior to any changes in the actual conduct of the operation from those proposed in the Environmental Management System.

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10.3.4 The Environment Agency will be notified within 14 days of the occurrence of the following matters except where such disclosure is prohibited by Stock Exchange Rules.

Where the operator is a registered company:

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

10.4 Avoidance, recovery and disposal of wastes produced by the activities

10.4.1 The requirements laid down by The Waste Regulations 2011 will be complied with as far as possible and in particular: -

- a) Waste managed by the activities; and
- b) All waste generated by operations conducted onsite will be dealt with in accordance with the waste hierarchy; and
- c) If disposal is necessary, a manner will be selected which reduces the potential impact on the environment

10.4.2 All wastes generated will be quantified & characterised using appropriate competence.

10.4.3 Any hierarchy deviations will be justified and recorded.

10.4.4 Every three years all arrangements & practices around the management of wastes will be reviewed. Steps identified by such a review will be implemented as necessary & deemed appropriate to operational compliance.

10.5 Site Security

10.5.1 Security arrangements include an enclosed site perimeter with a main access gate/building door. CCTV cameras are in operation 24-hours a day. Outside operational hours the site access gates are shut and securely locked.

10.5.2 Security arrangements are visually inspected on a weekly basis. Any necessary repairs are recorded in the Site Diary (where appropriate) & will be completed as soon as possible to maintain the sites perimeter, which may result in interim repairs until an external contractor can attend site.

10.5.3 The Management Team constantly evaluates all onsite security arrangements.

11 Training

- 11.1.1 New employees' will receive an induction upon commencement of employment, which will involve a Member of the Management Team completing a training needs assessment to ensure all new employees have the required training to complete their day-to-day tasks correctly & safely.
- 11.1.2 Training is tailored depending on an employee's specific needs/ role within the Company; these needs are presented within the Table 7 below.
- 11.1.3 Training records are held within the Office.
- 11.1.4 Employees receive refreshers trainings on all internally provided training as required.
- 11.1.5 External companies provide specialist training to onsite employees as and when it is required with appropriate refreshers as determined by the external trainers.

Table 7: Training Matrix (Training Needs Assessment Example not an exhaustive list)

| Training Requirements | | Management Team | Admin Staff | Operatives | External Contractors |
|-------------------------------------|--|-----------------|-------------|------------|----------------------|
| Internal Training ('Toolbox Talks') | Environmental Management System Procedures | | | | |
| | Emissions Management Procedures | | | | |
| | Fire Awareness (Briefing) | | | | |
| Externally Completed Training | Mechanical Equipment | | | | |
| | First Aider | | | | |
| | Fire Marshall | | | | |
| | Fire Awareness | | | | |

| Key | |
|--------------|--|
| Required | |
| Not Required | |

12 Maintenance

12.1 Daily Checks

- 12.1.1 Operatives will visually inspect all mechanical equipment on a daily basis prior to the commencement of operations.
- 12.1.2 Defects are raised with a Member of the Management Team & recorded as appropriate.
- 12.1.3 If repairs cannot be completed onsite an appropriate external contractor (dependent on the type of malfunction) will be contacted to affect a repair.

12.2 Weekly Checks

- 12.2.1 A Member of the Management Team will undertake a thorough visual inspection of all critical site infrastructure & equipment on a weekly basis.
- 12.2.2 Repairs will be recorded in the Site Diary where appropriate. If a repair cannot be completed onsite, then the faulty item will be isolated, and arrangements made for repairs to be affected as soon as practicable.

12.3 Annual Checks

- 12.3.1 Mechanical equipment as defined under the LOLER Regulations will have CTE inspections completed on a yearly basis & all equipment will undergo the manufacturers or suppliers' recommended frequency for servicing.
- 12.3.2 Routine mechanical maintenance is scheduled against the records kept in the Office. These records determine the frequency by which inspections take place.
- 12.3.3 All records will be kept in the Office.

12.4 Maintenance Checklist

Table 8: Maintenance Checklist (Recommendations)

| Maintenance | Frequency | | | | | Location of Instructions |
|--|-----------|------|-------|------|---------|--------------------------|
| | Day | Week | Month | Year | 5 years | |
| Internal | | | | | | |
| Clean up Spills on Surfaced Areas. | O | | | | | Office |
| Inspect Integrity Of Site Security Perimeter | O | | | | | Office |
| Inspect Integrity & State Of Site Surfaces/Access Road | O | | | | | Office |
| Clean Site Surfaces To Prevent 'Track-Out'. | O | | | | | Office |
| Inspect Storage Areas/Bays/Containers | O | | M | | | Office |
| Inspect Drainage Gullies/Slit Traps | O | | M | | | Office |
| Inspect of Interceptor | | | | M | | Office |
| Inspect Electrical Equipment | | M | | | | Office |
| Inspect Fire Fighting Equipment | | | M | | | Office |
| Inspect Mechanical Equipment | O | M | | | | Office |
| External | | | | | | |
| Operational Fleet (Servicing/Mot) | | | | E | | Office |
| Mechanical Equipment (Loaders/Grabs/Vehicles) (Loler) | | | | E | | Office |
| Fire Extinguishers | | | | E | | Office |
| PAT Testing | | | | E | | Office |
| Electrical Wiring | | | | | E | Office |
| Weighbridge Calibration | | | | E | | Office |

| Key | |
|---------------------|---|
| Management Team | M |
| Operative | O |
| External Contractor | E |

13 Contingency Planning

Table 9: Contingency Measures

| Eventuality | Procedures/Measures |
|---|--|
| Accident | <p><u>Measures may include:</u> -</p> <ol style="list-style-type: none"> 1. The affected area will be isolated and an appointed 'first aider' will be contacted to attend to any injured party. 2. If necessary, the emergency services will be contacted. 3. A Member of the Management Team will decide on a case-by-case basis if cessation of operations around the affected area and reception of waste is necessary until the appropriate emergency services have arrived. 4. A Member of the Management Team will complete an Accident Investigation Report (RIDDOR). |
| Seasonality (Including Transportation Shortages) | <p><u>Measures could include:</u> -</p> <ol style="list-style-type: none"> 1. Confirm current storage times for materials accumulated onsite. 2. Contact outlets for the specified stream and arrange transportation. 3. Transport all waste accumulated within a designated container, even if it may be economically undesirable to do so, i.e., the container for transportation is not full. |
| Supply Chain Failure (Including Transportation Shortages) | <p><u>Measures could include:</u> -</p> <ol style="list-style-type: none"> 1. Confirm current storage times for materials accumulated onsite. 2. Increase monitoring of material stockpiles onsite. 3. Contact outlets for the specified stream and arrange transportation. 4. If the outlet is not receiving the specified waste stream, contact other outlets. 5. Conduct investigations into potential alternative outlets if potential outlets are not accepting specified streams. 6. Seek advice from EA. |
| Breakdowns (Mechanical Equipment) | <p><u>Measures could include:</u> -</p> <ol style="list-style-type: none"> 1. Immediate isolation of the affected machinery. 2. External repair/servicing contractors are instructed to effect repair. 3. Mechanical equipment on the adjacent site will be deployed in interim if available & deemed necessary. 4. Hire in relief equipment in interim if needed. 5. Suspend the acceptance of wastes that require handling by mechanical equipment & notify the EA. 6. Reschedule material despatched to align with scheduled repairs and or relief machinery availability. |
| Enforced Shut Down & Site Closure | <p><u>Measures could include:</u> -</p> <ol style="list-style-type: none"> 1. Appropriate signage will be erected notifying any visitors that operations have been suspended. 2. Advise customers of the situation. 3. No more wastes will be accepted on to site. 4. Contact all potential outlets to ensure that all waste material is managed in accordance with the waste hierarchy where possible. 5. Notify EA that customers & receiving outlets have been contacted and provide scheduled dates for material removal. 6. Notify EA once stockpiles have been reduced to acceptable level |
| Extreme Weather | <p><u>Measures could include:</u> -</p> <ol style="list-style-type: none"> 1. Confirm current storage times for materials accumulated onsite. 2. Increase monitoring of material stockpiles onsite. 3. Contact outlets for the specified stream and arrange transportation. 4. Notify EA if the extreme weather is affecting the operation and potential compliance with the Permit. |

14 Emissions Management

- 14.1.1 Condition 3.1 relates to the control of emissions of substances not controlled by emission limits as follows: -

3.1.1 Emissions of substance not controlled by emissions limits (excluding odour) shall not cause pollution. The operator shall not be taken to have breached this rule if appropriate measures, including, but not limited to, those specified in any approved emissions management plan, have been taken to prevent or where that is not practicable, to minimise, those emissions.

3.1.3 All liquids in containers, whose emissions to water or land could cause pollution, shall be provided with secondary containment, unless the operator has used other appropriate measures to prevent or where that is not practicable, to minimise, leakage and spillage from the primary container

- 14.1.2 This section of the site EMS addresses any potential emissions that may arise from site operations. It demonstrates the measures taken to prevent or minimise the release of emissions such that they do not cause pollution as required by Condition 3.1 & defined in Condition 4.4 Interpretation:

“Pollution” means emissions as a result of human activity, which may: -

- (a) Be harmful to human health or the quality of the environment,*
- (b) Cause offence to a human sense,*
- (c) Result in damage to material property, or*
- (d) Impair or interfere with amenities and other legitimate use of the environment.*

14.2 Monitoring

- 14.2.1 Employees will remain mindful of the potential impact the operation could have on the local environment and take all reasonable steps to avoid giving rise to pollution or a nuisance as a consequence of the site operations.
- 14.2.2 In the event of on-going issues or concerns being identified these will be investigated and appropriate actions implemented. This may include the formulation of management plans.
- 14.2.3 In the event of an emissions release that has caused, is causing or may cause significant pollution, the Environment Agency will be notified within 24 hours (complete form in [Appendix EMS4](#)), advice taken and action recorded.

14.3 Dust Emissions

- 14.3.1 Revert to Dust Emissions Management Plan for Dust Emissions Management Procedures.

14.4 Odour Emissions

- 14.4.1 Revert to Odour Emissions Management Plan for Odour Emissions Management Procedures.

14.5 Noise

- 14.5.1 The overall noise emissions amenity impact is considered to be low, due to the nature of adjacent operations & onsite controls/procedures.

14.6 Noise Control

- 14.6.1 Noise generated on the site would be principally associated with the loading and unloading of vehicles and the operation of mechanically machinery.
- 14.6.2 Appropriate silencing equipment is fitted to all plant/machinery where appropriate and all equipment is operated in accordance with the manufacturer's recommendations.
- 14.6.3 Visual maintenance inspections are carried out on all equipment and machinery both daily & weekly. Any malfunctions or defects are therefore identified at the earliest opportunity, which will be recorded in the Site Diary if any actions/follow ups are taken.

14.7 Noise Monitoring

- 14.7.1 Operatives & Member of the Management Teams will monitor noise levels on an ongoing basis throughout the working day. Observations will be recorded in the Site Diary and within Appendix EMS6 will be completed.

14.8 Scavenging Birds

- 14.8.1 It is not expected that scavenging birds will present any significant problems as the site will not be accepting any putrescible or food wastes.
- 14.8.2 Operatives & Members of the Management Teams will monitor conditions on an ongoing basis throughout the working day.

14.9 Pests

- 14.9.1 The risk of infestation of pests and vermin is minimised by maintaining general good housekeeping and ensuring that the site is clean and tidy.
- 14.9.2 Operatives & Member of the Management Teams will monitor site conditions of any signs of pest infestation.
- 14.9.3 In the event that flies, or other such problematic insects are introduced to the site with incoming waste, insecticides offering rapid and long-term

treatment will be utilised and the offending waste promptly removed from site.

14.10 Litter

14.10.1 The overall impact is considered low due to onsite control measures including netting & palisade fencing deployed along the perimeter of the site.

14.10.2 Operatives conduct visual litter inspections on a daily basis.

14.10.3 Any escape of litter will be controlled throughout the working day & cleared immediately on identification

14.10.4 Operatives complete a final visual inspection around the site perimeter at the end of the working day and removal of any fugitive material/debris, access road and operational areas at the end of the working day.

14.11 Mud & Debris Management Procedures

1. Operatives conduct regular visual inspections throughout the working day.
2. Debris/mud created by waste material stockpiles is to be returned to the pile.
3. On identification the area will be cleared: -
 - a. Reaction time: Public highway immediately i.e., within 1 hour of detection and within the permitted boundary as soon as practicably possible by the end of the working day.
4. All vehicles leaving the site to be sheeted to prevent any material/debris falling out during transportation.

15 Incident Response Procedures & Instructions

16 Emergency Procedures

16.1.1 The following procedure applies to **All Emergencies**:

1. A Member of the Management Team will take immediate control of any incident pending handover to the appropriate authority (if currently onsite).
2. Gather as much information as possible, including names & addresses of any bystanders & take photos as evidence if possible.
3. Appropriate personal protective equipment is to be used at all times (PPE is located within the Company Office).
4. Complete an Environmental Incident Record form as shown in Appendix EMS1.

16.2 Environmental Incident Record Form Procedure

1. Complete Environmental Incident Record Form as detailed within Appendix EMS1 in the event of any accident/incident with potential environmental implications.
2. Pass completed form to a Member of the Management Team for investigation.
3. Once investigations are complete any corrective action recommended.
4. A copy of any completed forms is held within the Office once actioned for at least three years.

17 Complaints

- 17.1.1 In order that any complaints can be substantiated it is imperative that the site is immediately informed either by the complainant themselves or by the Environment Agency or Local Authority.
- 17.1.2 The site telephone number is clearly displayed at the site entrance and local residents are encouraged to immediately contact the site in the event of any off-site issues that might be attributable to site operations being detected.

17.2 Complaints Investigation Procedure

1. Complete a Complaints Record Form (only trained operatives authorised).
 2. Once completed, the form must be passed onto the Company Director.
 3. An investigation is undertaken by the Company Director to determine presence/absence, characteristic and intensity of issue. The time of the complaint will be linked with site activities. Review the Site Diary to determine if any abnormal site operations/conditions were at the time of the complaint.
 4. The Company Director will determine the appropriate action necessary to remedy/mitigate the causes of the identified complaint.
 5. Specialist advice will be sought if deemed necessary.
 6. Complete an Environment Incident Record Form (Appendix EMS1) if deemed necessary.
 7. Any actions taken will be recorded
 8. Send copy of the completed form (Appendix EMS4) to the Environment Agency Permitting Officer within 24 hours of detection.
 9. All complaint forms will be available for inspection by representatives of regulatory bodies.
- 17.2.1 All complaint forms will be available for inspection by representatives of regulatory bodies.

18 Leakages or Spillages Procedure

18.1.1 On identification of a **Leak or Spillage** the following procedure is to be followed to:

1. Prevent unauthorised access to the affected area
2. Prevent uncontrolled escape of potentially contaminating liquids using supply of absorbent materials to control the flow of liquids.
3. If safe to do so, isolate source of leak/spillage to prevent further losses, which may involve switching off a particular piece of machinery & deploying a containment vessel (i.e., drip trays) underneath the affected area.
4. If necessary, initiate controlled evacuation of the site.
5. If the leak/spillage is battery acid, apply a neutralising agent hydrated lime or similar (please note that water in a large quantity will only dilute the acidity & will not neutralise it) on the affected areas (Operatives must use appropriate PPE; gloves, face masks & goggles, whilst handling hydrated limes).
6. All contaminated absorbents must be placed in a leak proof container, which is labelled & stored pending removal.
7. Seek specialist advice on decontamination of the site surfaces if necessary
8. Complete an Environmental Incident Record Form (See [Appendix EMS1](#))
9. Any actions taken will be recorded in the Site Diary
10. Send copy of the completed form ([Appendix EMS4](#)) to the Environment Agency Permitting Officer within 24 hours of detection.
11. Confirm site clean up with the Environment Agency.
12. Replenish supplies of absorbent materials.

19 Equipment & Machinery Malfunction & Failure Procedure

19.1.1 On identification of any **Equipment or Machinery Malfunctions or Failures** the following procedure is to be followed to:

1. Cease operations immediately & determine if continuation of use poses a significant risk to health or the environment.
2. If continuation poses a significant risk, switch the piece of equipment off & isolate the affected equipment.
3. Notify a Member of the Management Team who will instruct the appropriate maintenance personnel or external contractor to undertake necessary repairs.
4. Notify Environment Agency Permitting Officer if the malfunction or failure could cause pollutants to escape the permitted boundary.
5. Complete an Environmental Incident Record Form. (See Appendix EMS1)
6. Any actions taken will be recorded in the Site Diary.
7. Send copy of the completed form (Appendix EMS4) to the Environment Agency Permitting Officer within 24 hours of detection.

20 Non-Conformance Procedure

1. Non-conformance identified.
2. A Non-Conformance Record form is completed (see Appendix EMS3) and passed to a Member of the Management Team
3. The Member of the Management Team initiates an investigation of the non-conformance & then ascertains potential impacts on the environment and how serious any potential effects could be.
4. Once the non-conformance has been assessed, action will be taken to remedy the cause.
5. All actions will be recorded.
6. In the event of an emissions release that has caused, is causing or may cause significant pollution, the Environment Agency will be notified within 24 hours, advice taken and actions taken will be recorded in the Site Diary.
7. Send copy of the completed form (Appendix EMS4) to the Environment Agency Permitting Officer within 24 hours of detection.

21 Periodic Review

21.1.1 The adequacy of this EMS will be review as necessary as a result of any operational change or in light of any non-conformance.

Appendix EMS1: Environmental Incident Record Form

| | |
|---|---|
| Date & time of the incident | |
| What happened, what was it about? | |
| Was anyone else aware of this – other witnesses? If so, who? | |
| What caused it? | |
| What have you done to make sure that it does not happen again? | |
| Was there any significant pollution or environmental damage to land, water or protected areas – for example: dust, odour or noise pollution outside the site or spillage of polluting liquids onto the ground, or at a site of special scientific interest, or into a drain or a watercourse? (If so, then complete an incident form) | |
| Is there a continuing threat? Yes/No | |
| If there was (or still is), then you must take steps to prevent further damage and notify the Environment Agency on 0800 807 060 and any other relevant regulators ASAP. Have you done so? Yes / No | Who did you phone? At what time did you phone? |
| You must also write or send an email to confirm this to the local office (see your accident management plan for the address) Have you done so? | Yes/No What date did you contact? |
| Please print your name, date and sign: | |

Appendix EMS2: Complaint Record Form

| | |
|---|---|
| Who made the complaint? Name: | |
| Address | |
| Phone No | |
| Date and time they made the complaint | |
| What happened, what was it about? | |
| Was anyone else aware of this – other neighbours or your staff? If so, who? | |
| Did the complaint relate to your site? If so, what happened? What went wrong? | |
| What have you done to make sure that it does not happen again? | |
| Was there any significant pollution or environmental damage to land, water or protected areas – for example: dust, odour or noise pollution outside the site or spillage of polluting liquids onto the ground, or at a site of special scientific interest, or into a drain or a watercourse? (If so, then complete an incident form) | |
| If there was, then you must take steps to prevent further damage and notify the Environment Agency on 0800 807 060 and any other relevant regulators ASAP. Have you done so? Yes / No | Who did you phone? At what time did you phone? |
| You must also write or send an email to confirm this to the local office (see your accident management plan for the address) Have you done so? | Yes/No What date did you contact? |
| Please print your name, date and sign: | |

Appendix EMS3: Non-Conformance Record Form

| | |
|---|---|
| Date and time non-conformance identified | |
| What happened, what was it about and what permit condition does it relate to? | |
| What caused it? i.e., what happened that should not have happened OR what didn't happen that should have? | |
| What has been done to make sure that it does not happen again? | |
| Has the site EMS been reviewed in light of the incident and have any changes to operations and procedures been rolled out in response? Include dates. | |
| Was there any significant pollution – for example: oil entering a surface water drain. If so what? | |
| If there was then you must notify the Environment Agency on 0800 807060 ASAP. Have you done so? | Yes/No/not applicable Time: Date: EA. Incident number: |
| Print name, date and sign | |

Appendix EMS4: Environment Agency Notification Form

Part A

| | |
|---|--|
| (a) Notification requirements for any malfunction, breakdown or failure of equipment or techniques, accident, or emission of a substance not controlled by an emission limit which has caused, is causing or may cause significant pollution | |
| To be notified within 24 hours of detection | |
| Date and time of the event | |
| Reference or description of the location of the event | |
| Description of where any release into the environment took place | |
| Substance(s) potentially released | |
| Best estimate of the quantity or rate of release of substances | |
| Measures taken, or intended to be taken, to stop any emission | |
| Description of the failure or accident | |

| | |
|--|--|
| (b) Notification requirements for the detection of any significant adverse environmental effect | |
| To be notified within 24 hours of detection | |
| Description of where the effect on the environment was detected | |
| Substance(s) detected | |
| Concentrations of substances detected | |
| Date of monitoring/sampling | |

Part B-to be submitted as soon as practicable

| | |
|--|--|
| Any further accurate information on the matters for notification under Part A | |
| Measures taken, or intended to be taken, to prevent a recurrence of the incident | |
| Measures taken, or intended to be taken, to rectify, limit or prevent any pollution of the environment which has been or may be caused by the emission | |
| The dates of any unauthorised emissions from the facility in the preceding 24 months | |
| Name* | |
| Post | |
| Signature | |
| Date | |

*Authorised to sign on behalf of operator

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Appendix EMS5: Accident Investigation Report Form

Site Details:

| | |
|-------------------|---|
| Date of Accident: | Time: |
| Site of Accident: | Site Manager/Supervisor at Time of Event: |

The injured person (If required)

| | |
|---|--|
| Name of Injured Person: | Date of Birth or Age: |
| Nature of Injuries: | Part of Body Injured (Tick as Appropriate) |
| | Hands, Wrists, Finger Feet, Ankles, Toes Legs, Knees, Hip, Thigh Eyes Head, Face, Neck Torso Back, Spine |
| First Aid Treatment: | |
| Hospital Treatment & Contact Address/Telephone: | |
| Follow Up Treatment (If Any) | |

Details of Accident (Please Detail Location Onsite):

| |
|--|
| |
|--|

For Office Use Only:

| | |
|---|---------------------------|
| Time Off Work (Seven Days RIDDOR): | |
| Recorded in Accident Log Book: Y/N | Accident Log Book Number: |
| RIDDOR Reportable: Y/N | RIDDOR Report Number: |
| Further Investigation Required: Y/N Note: Use the accident log number for investigation. | |
| Distribution: Office/Site File/Client/Other (Please Specify) | |

| |
|---|
| Continuation box for any additional information or information not able to be entered in other boxes: |
|---|

| | |
|-------------|------------|
| Print Name: | Date: |
| Position: | Signature: |

Instructions for reporting accidents:

All work in the immediate area with cease and the working area is to be made safe.

In the event of an accident the extent of the injuries will be immediately assessed by the first aider:

1. If the injuries sustained are of minor nature than the first aid provider will apply first aid to the injuries and make appropriate recommendations to the injured person

If the injuries sustained are of a significant or serious nature than the first aid provider will administer as much first aid that they are capable & comfortable to deliver & make the injured person as comfortable person as possible while the emergency services are contacted

Appendix EMS6: Emissions Management Assessment Form

| Noise & Vibration Assessment Form | | | | | | | | | | |
|------------------------------------|--------------------------------|---------|----------------|--------------|-------------|--|---------|--|--------|--|
| Start Time Of Check | | AM | | PM | Finish Time | | AM | | PM | |
| Duration (Of Check) | | | | | | | | | | |
| Location Of Check If Not On Site | | | | | | | | | | |
| Weather Conditions | Dry | | Rain | | Fog | | Snow | | Other | |
| Temperature | Hot | | Very Warm | | Warm | | Mild | | Cold | |
| Wind Strength | None | | Light | | Steady | | Gusting | | Strong | |
| Wind Direction From | North | | NE | | E | | SE | | | |
| | S | | SW | | W | | NW | | | |
| Intensity | 0 No Noise & Vibration Present | 1 Faint | 2 Intermittent | 3 Continuous | | | | | | |
| Noise & Vibration Detection | Point 1 | Point 2 | Point 3 | Point 4 | Point 5 | | | | | |
| Intensity (Using Above Scale) | | | | | | | | | | |
| How Far Was It Travelling | | | | | | | | | | |
| Is The Source Evident? | | | | | | | | | | |
| If Yes-Name It | | | | | | | | | | |
| Any Other Comments Or Observations | | | | | | | | | | |

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Appendix EMS7: Site Infrastructure Plan

