

National Grid Environmental Management System – Summary

National Grid maintain a certified ISO 14001 Environmental Management System (EMS). Our EMS provides us with the framework we need to:

- manage our environmental impacts
- meet the requirements of applicable regulations, and
- assist in the continual improvement our environmental performance

The 'E-Manual' (see file "[B2.3.1 EMS Manual](#)") provides information on the core elements of the EMS and provides directions to related documentation including:

- Environmental Aspects
- Risks and Opportunities Register
- Our Stakeholder, Community and Amenity Policy
- Environmental Sustainability Policy
- Environmental Sustainability
- Emergency Response & Preparedness

A copy of our ISO14001 certificate is attached with this application – see "[B2.3.2 ISO14001 Cert](#)".

Controlling Environmental Impact

Operational control is required over activities identified in the aspects evaluation that have a significant impact on the environment. Control measures are outlined in Operational Procedures, designed to ensure that the best environmental practices are adopted and to ensure the Company complies with legislation. The Operational Procedures ensure compliance with the National Grid Environmental Policy, as follows:

Procedure No.	Title
B2.3.3a UK/T1/8.8.1/S	Waste Management
B2.3.3b UK/T1/12.1.1/S	Waste Water Management
B2.3.3c NGUK/PM/SHE/202	Energy and Water Resource Management
B2.3.3d NGUK/PM/SHE/205	Land Management and Biodiversity
B2.3.3e NGUK/PM/SHE/206	Land Contamination
B2.3.3f NGUK/PM/SHE/209	Use of Hazardous Substances
B2.3.3g UK/T1/8.9.3/S	Air Emissions Standard
B2.3.3h UK/T1/8.8.4/S	Statutory Nuisance Standard

PREPARING AND RESPONDING TO ENVIRONMENTAL EMERGENCIES AND INCIDENTS

Environmental Emergencies

Environmental emergencies, such as spillages of oil and other substances or gas escapes can have serious environmental consequences. Emergency situations are prepared for and managed in accordance with **B2.3.4 UK/T1/9.0.1/S Emergency Preparedness & Response Management Standard**.

Environmental Events

Environmental emergencies, such as spillages of oil and other substances or gas escapes can have serious environmental consequences. Emergency situations are prepared for and managed in accordance with Procedure **B.2.3.5 UK/T1/9.0.1/SD/3 Environmental - Emergency Response**.

The identification, assessment, correction and review of non-conformances to the EMS helps to achieve continual improvement in environmental performance. All environmental events (including near misses), and the associated actions taken to resolve them, are reported via the Incident Management System (IMS) in accordance with Procedure **B2.3.6 UK/T1/12.1.1/SD/1 Incident Reporting**.

Our **B2.4 Site Emergence Response Plan** outlines the steps to be taken should an incident occur that could result in pollution.

MONITORING AND REVIEWING PERFORMANCE

Key Performance Indicators

Key characteristics of activities that have a potentially significant impact on the environment are monitored and measured on a regular basis in line with Procedure **B2.3.7 NGUK/PM/SHE/216 Measuring and Monitoring Env Performance**. Progress towards the key performance indicators are reviewed by individual business units in conjunction with their SHEs (Safety, Health & Environment) Advisor.

Environmental Auditing

National Grid's *Safety, Health and Sustainability* team manage a risk-based audit programme, to ensure the Company is complying with its commitment to the Environment Policy, legislation and procedures. The audits identify areas where improvements in the system and operational practices can be made in order to improve environmental performance. They also ensure that the requirements of the ISO 14001 standard are also being met.

To ensure we comply with all applicable legal and other requirements, an evaluation of compliance checks is undertaken by all businesses. These checks are completed in accordance with the **B2.3.8 NGUK/SHE/224 Evaluation of Compliance Procedure**.

Line Managers and Directors are provided with reports, and progress against agreed actions to correct identified shortfalls in performance, in order to provide them with assurance that the Environmental Management System is delivering the required level of performance and is being utilised throughout the business.

Management Review

National Grid's EMS is reviewed in accordance with the **B2.3.9 NGUK/SHE/223 Environmental Management Review Procedure**. All business unit must review their needs to ensure the continuity, suitability and effectiveness of our EMS. Reviews assess the opportunities for environmental performance improvement and evaluate whether changes are needed.

B2.3 NG EMS Summary

An annual Management Review Report is compiled by the Environmental Operations Manager, for discussion to identify any corrective actions necessary for continual improvement in environmental performance. Existing objectives and targets are reviewed and amended where necessary. Should any actual and/or potential areas of non-conformity to our EMS be identified, corrective action must be taken. Any corrective actions must be taken in accordance with the **B2.3.10 NGUK/SHE/227 - Nonconformity & Corrective Action Procedure**.

Site Infrastructure Plan

An overview for the Site Infrastructure can be seen in the “*B2.5a Site Layout Plan*” and “*B2.5b Outside Site Plan*” files.

Vulnerable locations

The local area map (file “*B2.6 Magic Map – Nexus Point*”) displays that there are no environmentally sensitive areas bordering site. The site is also not located next to any Special Area’s of Conservation, sites of Special Scientific Interest or Special Protection Areas. It has been identified that Lapwing bird’s habitat in the local area.

The closest water source to site is the River Thames which is over 400m away, with multiple industrial premises located in between site and the river itself. The site is located within an industrial park so there are no residential premises bordering it either.

Drainage & Mains

The “*B2.7 Nexus – Drainage Plan*” file provides an overview of the site drainage system. A catch pit chamber is being installed (Feb/March 2021) to the site drainage, as an additional control measure should a hazardous spill occur. An overview of the catch pit chamber is provided in the “*B2.7a Catch Pit Install*” and the “*B2.7b Catch Pit Details*” files.

An overview of the site mains electricity supply can be seen in the “*B2.7.1 Western Power Supply - Nexus*” file.

Site Operations

An overview of the Site Operations is provided in the *NGPR01-Segregation Process* document.

Site Operations – Waste Storage Plan

Our Waste Storage Plan will replicate the processes used for our previous permit (EPR/EB3405LH) as the operational activities remain the same.

We are not a waste receiving site as all materials returned to us are treated as assets. Each asset returned to us is assessed and a significant proportion can be re-used or refurbished. Only those that fail to meet this criteria are then classed as waste.

As part of the industry guidelines we operate within (MAMCOP), it is our duty as the asset owner to retrieve our assets from other sites. Working within these standards ensures that we only ever collect assets that belong to us. Should an asset/material be returned to us in error, we have full traceability of where it was collected from and the site will be notified to retrieve it from us.

A summary of Waste Storage is provided in the *NGPR02-Waste Storage Plan* document.

Site and Equipment Maintenance Plan

All site equipment is serviced, maintained and tested to comply with regulations. All equipment has a dedicated maintenance supplier who performs the annual servicing and testing.

Equipment	Quantity	Serviced	Inspected / Tested
FLTs	3	Every 6 Months	Annually
Pallet Trucks	6	Every 6 Months	Annually
Hoist	1	Every 6 Months	Annually
Lifting Accessories	30	Every 6 Months	N/A
Mercury Machines	2	Annually	N/A

Contingency Plans

Our *B2.8 MARC BCM Plan* would be utilised should an event occur that prevents normal operations from happening. Should the site encounter an enforced shutdown or breakdown, the potential impact to the environment would be very low. This is due to all operational activities taking place inside the building, with all waste materials stored in secure receptacles such as magnums.

The biggest potential risk to the environment is an oil spill occurring and leaking into the drainage system. To control this risk, all operational staff complete an Oil Spill training course to ensure they know the required actions should this event occur. There are multiple spill kits on site which are inspected monthly. Additionally, the mercury machines are located inside which limits the chances of any potential spill reaching the drains.

Online Security

The Global IT function at National Grid manage the threat of Online Security in accordance with the **B2.9 IT BMS Standard**. This team operate 24/7 and constantly monitor potential cyber threats. All cyber or data incidents are reported to the cyber response team.

Contact Information

A notice board will be displayed on the site perimeter wall which will provide the public with emergency contact information for the site. It will replicate the sign used for our previous permit (EPR/EB3405LH), image below;



Complaints Procedure

Should a complaint be received in relation to our permitted activities, the complaints procedure would be followed in accordance with the **B2.10 UK/T1/8.8.4/SD/1 Statutory Nuisance (Supporting Document)**.

Staff Competence:

There are two technically competent managers (TCMs) on site who have both completed the **“WAMITAB LEVEL 4 High Risk Operator Competence for Managing Transfer of Hazardous Waste”** qualification. The TCMs are responsible for managing all operational procedures, ensuring safety for all employees and compliance with the environmental permit.

All operational staff are National Grid employees who were provided with a thorough induction when they joined the business. All work activities are risk assessed and have standard operating procedures (SOPs) which all staff must sign-off before undertaking any work activity. All SOPs & Risk Assessments are reviewed annually by management.

All training records are recorded on a central system (MyHub) which flags when training refreshers are due. Additionally, a local training matrix is maintained which displays what training courses each employee has undertaken. No member of staff is permitted to use equipment or perform a work activity without receiving the required training.

Keeping Records & Understanding what we do:

As per our previous permit (EPR/EB3405LH) requirements, all records are kept for a minimum of 6 years. A Waste Transfer Note accompanies all non-hazardous waste loads collected from site. A Hazardous Waste Consignment Note is completed for every hazardous waste collection.

All waste paperwork is stored chronologically on site and each load is logged onto the *Waste Tracker* which is a file managed by the site TCMs. This file is used to assist with the quarterly returns report sent to the Environment Agency.

An Environmental Folder containing all key documents is maintained by the TCMs and is readily available on-site. This folder provides easy access to documents such as; Site Permit, Emergency Response Plan, Drainage Plan, Supplier Documentation, Environmental Policy, Compliance Assessment Reports.

All SOPs and Risk Assessments are saved onto a Share Point site which all staff have controlled access to. The Share Point is where other key management documents are located including; Training Matrix, Management Reviews, Management System Plans and electronic copies of the files located in the Environmental Folder.

Site Condition Report

The site condition report is attached with this application – see the *“B2.11 Site Condition Report - Unit 8 Nexus Point”* file.