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1 Introduction

1.1 Background

Recovercyl are applying for an Environmental Permit. A bespoke Environmental Management System (EMS) is being developed for implementation on site, as required under the Permit.

The EMS will be developed during the determination of the Environmental Permit Application and be fully implemented on site at point of Permit issue. A summary of the proposed EMS is detailed below.

1.2 Guidance

Table 1.1 below details the guidance documents that have been considered during the preparation of this EMS Summary Document.

Table 1.1 – Guidance Documents		
Reference	Title	Document Issue Date / Version
https://www.gov.uk/guidance/develop-a-management-system-environmental-permits	Develop a management system: environmental permits	Published 1 st February 2016 Last updated 3 rd April 2023

1.3 Content Map

The Environment Agency's 'Develop a management system: environmental permits' guidance details the requirements of a management system and how it should be developed and maintained. For ease of assessment, Table 1.2 below acts as a 'Content Map' listing the headings from the EA's EMS Summary Guidance and cross referencing them to the relevant section and detail included within this summary document.

Table 1.2 - Content Map v Guidance Requirements	
EA EMS Summary Content Heading	Report Cross Reference
What to put in your management system and how to organise it.	All sections of this document.
How to develop your management system.	Section 1.1 / Section 2.1 / 2.2
Prepare your site infrastructure plan.	Section 2.2.1 / 2.2.7
Site operations.	Section 2.2.2
Site and equipment maintenance plan.	Section 2.2.2 / 2.2.6
Contingency plans.	Section 2.2.1
Accident prevention and management plan.	Section 2.2.1
A changing climate.	Section 2.2.8
Complaint's procedure.	Section 2.2.2
Managing staff competence and training records.	Section 2.2.5 / 2.3

Table 1.2 - Content Map v Guidance Requirements	
EA EMS Summary Content Heading	Report Cross Reference
Keeping records.	Section 2.2.3 / 2.2.4 / 2.2.8
Review your management system.	Section 2.2.8
Site closure.	Section 2.2.8
Make sure people understand what you do.	Section 2.3

2 EMS Summary

2.1 EMS Structure

The bespoke Recovercyl EMS will be structured under the following headings:

- Index;
- System Documents and Management Plans;
- Environmental / Operating Procedures;
- Internal Monitoring and Recording Forms;
- External Report Forms;
- Environmental Training Documents;
- Schedules and Timetables;
- Plans and Drawings;
- Records.

Further detail has been included below for each of the above headings. Currently, there are no plans for the system to be certified against a standard. However, the basis of the system has been previously audited and accepted by the Environment Agency at various Installations and Permitted facilities, including Waste Transfer Stations.

2.2 EMS Outline

2.2.1 System Documents and Management Plans

This section of the EMS will contain key documents that form the core of the installation's EMS. In summary:

- Environmental Policy.
- Site Infrastructure Plan.
- Environmental Accident Management Plan.
- Fire Prevention Plan.
- The Environmental Policy will also be held within this section of the management system.

In line with the requirements of the EA's guidance note, the Site Infrastructure Plan and Environmental Accident Management will detail:

- Location of buildings, and other main constructions including the storage tanks.
- Storage facilities for any hazardous materials.
- Location of items for use in accidents and emergencies such as spill kits, site entrances.
- Site drainage details.
- Sensitive Receptors.
- Identification of the Environmental Risks and Hazards.
- Measures in place to reduce environmental risks from accidents.

The Environmental Accident Management will include the commitment that in the event of an environmental accident on site resulting in impact on sensitive receptors, Site Management will:

- Instigate remedial action immediately.
- Promptly record the events and actions taken.

- Ensure the Regulator is made aware without delay.

In addition to the Environmental Risk Assessments submitted in support of the application process, these documents set out how the Site will minimise any potential impact on the environment, during normal operations or variation in normal operations such as breakdown(s), enforced / unscheduled shutdowns.

2.2.2 Environmental / Operating Procedures

Environmental and Operating procedures developed as part of the assessment and control of environmental risk are located in this section of the EMS. These procedures will include, but not be limited to those detailed in Table 2.1 below.

Table 2.1 –Summary of EMS Procedure	
Procedures / Policies	Purpose
Emergency, Incident and Non-conformance Procedure	The procedure identifies potential for and respond to environmental emergency and incident situations in order to prevent and mitigate the environmental impacts associated with emergency and incident situations. The procedure also includes dealing with non-conformances with EMS compliance.
Material Pre-Acceptance and Acceptance Procedure	Designed to control of the acceptance of materials to site to ensure only materials that are acceptable under the Permit are delivered to site.
Delivery and Collection Procedure	For control of collections and deliveries of potentially hazardous materials at site and ensures that deliveries are supervised. e.g., if an environmental incident such as a spill occurs it is cleaned up appropriately and not left to become a potential odour source and / or escape off site.
Fugitive Emissions Monitoring / Environmental Inspections	The site infrastructure monitoring programme provides a robust mechanism that ensures fugitive emissions of materials, including those that are potentially hazardous and which could impact upon sensitive receptors, are kept to a minimum.
Spill Control Procedure	Control, mitigate, clean-up of spills and / or leaks of potentially hazardous materials on site to ensure they are cleaned up appropriately minimising potential impacts on the environment and identified sensitive receptors.
Communication and Complaints Procedure	Communication with regulatory authorities and environmental complaints from third parties is covered by this procedure so that the relevant corrective action can be undertaken in the event of a complaint. The system is designed to deal with environmental issues including odour and noise.
Maintenance Procedures	These will detail any environmentally critical key equipment along with their operation and maintenance instructions.

2.2.3 Internal Monitoring and Recording Forms

All internal inspection report forms developed to reduce the risk of equipment or process failures having potential to impact on the environment are located in this section of the EMS. The section includes, but not limited to, the following:

- Incident & Corrective Action Forms.

- Site Infrastructure Inspection and Monitoring Forms.
- Materials Pre-Acceptance Audit Forms.

2.2.4 External Report Forms

All Regulatory reporting required under the Environmental Permit is detailed and recorded in this Section of the EMS, for example EA Notification Forms.

2.2.5 Environmental Training Documents

All training records, assessments and training materials related to the EMS will be recorded in this section of the EMS. All employees undertake training appropriate to their role on site. This includes induction training to cover basic environmental issues and site's responsibilities to comply with the Environmental Permit including:

- Awareness of regulatory implications of the Permit for the operation and how this relates to them;
- Awareness for the need for reporting deviations from the permit and who to report to;
- Actions to be taken to prevent and mitigate accidental emissions;
- Spill control.

2.2.6 Schedules and Timetables

Schedules and timetables will be maintained as part of the EMS and/or in related systems (e.g. Maintenance systems). The schedules will include, but not be limited to schedule of accepted materials, sensitive receptor information and an emergency contact list.

2.2.7 Plans and Drawings

Site plans and drawings related to Permitted Operations will be stored in this section of the EMS, for example the Installation Boundary Plan and Site Layout Plan.

2.2.8 Records, Reviews and Risk Assessments

The EMS will ensure records are available to demonstrate compliance with both the Environmental Permit and the EMS. This section of the EMS will Index the records to be held and cross reference to where they are stored. Records that are required to be held by the Environmental Permit will include those set out within the Site Closure Plan, Permit Reports and records of risk assessments including the Climate Change Adaptation Risk Assessment.

The review requirements of each EMS document will be specified within relevant EMS documents and records of any changes documented to provide a clear and transparent audit trail.

2.3 Management Structure and Responsibilities

Site will have sufficient staff and adequate resources available to ensure the site is run effectively to comply fully with the Environmental Permit, including a designated Technically Competent Manager. In addition, staff having clearly defined roles and responsibilities are trained in the procedures commensurate with their job role, to maintain control of the process and potential environmental impacts. The management representative with delegated responsibility will ensure site operations are carried out in accordance with the Environmental Permit, liaise with the Environment Agency and general public as required. The potential environmental risks posed by the work undertaken by contractors will be assessed during the planning phase and instructions / training provided to staff and contractors.