



## EMS Summary

### The Old Crown Dyeworks

EFR Ltd.



Minerals  
Waste  
Environment

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## **1.0 Introduction**

1.1 The Old Crown Dyeworks site ('The Site') operates under a comprehensive Environmental Management System, which is currently being updated in-line with the Environment Agency (EA)'s current guidance to reflect any changes to the operations at The Site. The changes include an increase in annual tonnage to 150,000 tonnes, the addition of waste code 19 12 12, and a change in layout at The Site to include a new building.

1.2 The updates will cover all new updates, such as details from the Fire Prevention Plan (FPP), Odour Management Plan (OMP), Dust Management Plan (DMP) and new procedures based on the new site layout.

## **2.0 Section 1 – Site Infrastructure Plan**

2.1 This section will relate to The Site's infrastructure / layout plan and detail the site operations, layout and any emergency kits. Additionally, the plan details emergency access points and monitoring points, drainage details (this will be shown on a separate drainage plan), and water, gas and electricity supply points where applicable.

## **3.0 Section 2 – Site Operations**

3.1 This section provides details on the layout of The Site, including access and parking, site surfaces and drainage, infrastructure (weighbridge, office etc), security and fuel storage, to reduce potential risks to the environment. The details of infrastructure and equipment would be updated to include information about the new buildings and resultant layout changes, and therefore include new procedural details (such as the location of the different waste bays, quarantine areas, any monitoring locations, etc.).

3.2 This section also includes the list of wastes accepted at The Site, and the steps taken at each stage of the site processes to minimise the risk of pollution, including Waste Acceptance Procedures. Additionally, maximum storage amounts and time limits, as well as procedures for ensuring these are not

exceeded, are included in this section.

#### **4.0 Section 3 – Site and Equipment Maintenance Plan**

4.1 This section includes plans for the maintenance of site plant and equipment, as well as site infrastructure itself. Details of how and when maintenance is carried out is included in this section. Maintenance of the site notice board at the site entrance is included in this section, for example, updating contact details should they change.

#### **5.0 Section 4 – Contingency Plans**

5.1 This section includes details of how impacts on the environment caused by unforeseen issues such as breakdowns, enforced shutdowns or extreme weather will be minimised through contingency plans.

5.2 This section also contains information on the controls in place to prevent environmental incidents taking place such as the control of mud, dust, odour, litter etc. and details of the operator's complaints procedure should an issue arise. This section will be updated, where appropriate, to include information regarding the increased tonnage and addition of the new waste code. Importantly, any new monitoring and reporting introduced through, for example, the FPP and OMP, will be detailed here, including how this is carried out, how often, and how it is recorded.

5.3 Details of non-compliance will also be provided in this section. Such information would include what the non-compliance is, how it was identified, resolutions to the non-compliance and corrective actions.

#### **6.0 Section 5 – Accident Prevention and Management Plan**

6.1 Section 5 details how accidents that could result in pollution or non-compliances will be dealt with. This section includes details of how accidents will be managed, how they are recorded and any action taken as a result, including corrective actions going forward.

## **7.0 Section 6 – A Changing Climate**

7.1 This section will include details on how the potential effects of climate change could impact the ability of The Site to prevent pollution. This will include details relating to monitoring of weather, upgrading systems and plant and equipment where applicable. Dust and odour in particular will be considered here, as the most likely impacts that could be affected by climate change.

## **8.0 Section 7 – Complaints Procedure**

8.1 This section will detail the complaints procedure for The Site. This will include how records of complaints are kept, how complaints are dealt with, investigated and resolved. In addition, the procedure for updating any procedures or corrective actions as a result of a complaint will be detailed in this section.

## **9.0 Section 8 – Managing Staff Competence and Training Records**

9.1 This section details the training requirements of the operator for areas such as general site rules, duty of care, and fire safety. This section would be reviewed to include training of the any new site infrastructure and plant preventative maintenance / operations reflecting the new buildings. Additionally, this section would include updated training as a result of the new FPP, OMP, DMP and Environmental Risk Assessment (ERA), where this has lead to a requirement for new training.

9.2 If specific training, for example relating to odour monitoring, is required from an external source, details of how this is carried out and who requires training, will be included here.

## **10.0 Section 9 – Keeping Records**

10.1 This section details the records that are kept, how they are kept and for how long. This section will include details of records of waste received at The Site.

The Site Condition Report (SCR) will also be referenced in this section, as well as the procedure for maintaining and / or updating the SCR.

## **11.0 Section 10 – Review of Management System**

11.1 The procedures for reviewing the management system will be detailed in this section. This includes checking that the site is operating in compliance with the Permit, as well as the update procedures if any site processes are changed which affect the EMS, or any other potential for changes to the potential impact on the environment.

11.2 Details of how changes are recorded are also included in this section.