



Health, Safety & Environment

Environmental Management Plan (Newhaven Rail)

Environmental Management Plan (Newhaven Rail)

Document Control

Version	Date	Author / Checked by	Change Description
1	14/11/2017		Document created
2	31/1/2022	MC	Updated and made into digital document.
3	25/05/2022	MC	Fire procedure amended to refer to Emergency Procedures.
See footer	20/07/2022	MC	Document control moved to Managed Documents.
4	16 05 2025	LL /CR	Update for variation to bespoke permit
5	18-07-2025	LL/CR	Updated for re-submission.

Environmental Management Plan (Newhaven Rail)

Table of Contents

1	Introduction	5
2	Site Details including Infrastructure, Engineering & Mobile Plant	5
2.1	Site Location	5
2.2	Operator Details	5
2.3	Emergency Contact Details	6
2.4	Site Layout and Maintenance	6
3	Operations	8
3.1	Permitted Waste Operations	8
3.2	Waste Acceptance Procedure	9
3.3	Waste Storage	9
3.4	General Process Description	9
3.5	Fuel and other Raw Material Delivery, Handling and Storage	10
4	Management of Operations	10
4.1	Daily Site Inspection	10
5	Environmental Control Measures	11
5.1	Dust	11
5.2	Pests & Vermin	12
5.3	Noise & Vibration	12
5.4	Odour	12
5.5	Litter	12
5.6	Mud and Debris	13
5.7	Discharge of Wastewater	13
5.8	Loss of Containment	13
5.9	Gas Build up in IBA Storage	14
5.10	Water Health	14
5.11	Flooding	14
5.12	Fire	14
5.13	Waste Management	14
6	Contingency Provisions	14
6.1	Mobile Plant & Machinery Failure	15
6.2	Investigation of Incidents	15
7	Emergency Procedures	15
7.1	Immediate Response	15
7.2	Secondary Actions	15
7.3	Reporting	15

Environmental Management Plan (Newhaven Rail)

7.4	Investigation of Incidents.....	15
7.5	Likelihood of Unmitigated Risks	16
7.6	Management.....	16
8	Environmental Incidents - Air	16
9	Environmental Incidents - Water and Land	16
10	Environmental Incidents - Fire	17
11	Communication, Record Keeping and Document Control	17
11.1	Site Diary/Log	17
11.2	Other Record Keeping	18
11.3	Document Control	18
11.4	Complaints.....	18
11.5	Management, Site Staff and Training	18
12	Reporting Non-Compliance and Taking Corrective Action	19

Drawings

[NE013-01 Site Drainage Plan \(Rev 0 Sheets 1 and 2\)](#)

[NE003-01 Dust Suppression Plan \(Rev 2\)](#)

Appendices

 [Environmental Aspects and Impacts Register Live.xlsx](#)

 [Compliance Obligations Register.docx](#)

[ESA IBA Sampling & Testing Protocol](#)

 [IMS Manual.docx](#)

 [IBA Acceptance Quarantine and Production Recording.docx](#)

 [Procedure and RA - IBA Collection \(Newhaven Rail\).docx](#)

Environmental Management Plan (Newhaven Rail)

1 Introduction

This document details the Management Plan for Day Group Ltd to accompany the Environmental Permit for the storage and transfer of Incinerator Bottom Ash (IBA) at Day Aggregates depot on North Quay Road, Newhaven.

Day Group Ltd acknowledge their responsibility in managing the environmental impacts of their activities, products and services and is committed to meeting all legislative requirements and standards which relate to environmental aspects. Day Group Ltd seek to continually improve their environmental performance and engage with its staff, customers, public and other stakeholders, such as regulatory bodies or local councils, to this end.

This Management Plan is a working document and is subject to regular management review and updates.

2 Site Details including Infrastructure, Engineering & Mobile Plant

2.1 Site Location

The depot is located within adjacent to the Newhaven Energy Recovery Facility at the northern end of North Quay Road in Newhaven, BN9 0DR. The National Grid Reference for the depot is 44616, 02151.

2.2 Operator Details

Day Group Limited
Day Group House
Transport Avenue
Brentford
Middlesex
TW8 9HF

Head Office Telephone No: 020 8380 9600

The management structure that is responsible for the activities at the depot is detailed below. The Depot Manager is responsible for day-to-day operations and compliance with the Environmental Permit (EP).

Directors:

- James Day - Managing Director
- Adam Day - Contracts Director
- Michael Woodward - Production Director
- Nick Sadler - Operations Director

Competent Person(s)

- Michael Woodward - WAMITAB Level 4 Treatment / Transfer of Non-Hazardous Waste;
- Mark Norris - WAMITAB Level 4 Treatment / Transfer of Non-Hazardous Waste.

Responsible Persons:

- Jason Corpas-Bravo - Depot Manager – EPOC
- Lee Peate - Assistant Depot Manager - EPOC

Environmental Management Plan (Newhaven Rail)

Depot Staff:

Position	Role	Relevant Qualifications
Depot Manager	Overall management of the depot including liaison with Energy Recovery Facilities	WAMITAB Level 4 COTC or EPOC
Deputy	Controlling day to day production and maintenance activities	WAMITAB EPOC
Weighbridge Operator	Controlling vehicles movements, inspections and site security.	
Shovel Operator	Stockpiling IBA and loading IBAA	QCF Level 2 and Operator Licence
Excavator Operator	Stockpiling IBA,	QCF Level 2 and Operator Licence
Maintenance Person	Routine maintenance and repairs to fixed and mobile plant	
General Operative	General duties, cleaning and assisting other operatives	

The depot is managed by sufficient staff who are competent to operate the depot without causing pollution. All staff have clearly defined roles and responsibilities. Records are maintained of the training and relevant qualifications undertaken by staff to meet the requirements of each post. In the event of additional cover being needed due to illness or holiday, other staff are deployed at this depot, or suitably qualified agency staff appointed.

Operations at the depot are under the control of a technically competent person who holds the relevant Certificate of Technical Competence (COTC) under the Waste Management Industry and Advisory Board (WAMITAB) scheme.

Further information regarding staff training is provided in section 11 of this document.

2.3 Emergency Contact Details

A full list of emergency contact details for the depot is provided on the site noticeboard.

2.4 Site Layout and Maintenance

Site Layout

A detailed [!\[\]\(d5d7044e5caf6907399af2dced8d6ff8_img.jpg\) NE003-01 Rev 2 Dust Suppression Plan-Model.pdf](#) and [!\[\]\(0718ece108875f096be32ef1aea65831_img.jpg\) NE013-01 \(Rev 0 sheets 1 and 2\) Site Drainage Plan.pdf](#) are included in this EMP representing the as built layout. These plans are subject to update and change as the depot develops.

The areas of the depot used for IBA reception, storage and transfer are within the Permitted boundary, there is also an aggregate yard which forms part of the same site but is not within the Permitted boundary.

Environmental Management Plan (Newhaven Rail)

The site surfacing comprises impermeable concrete hardstanding in the IBA storage building and surrounding roadways, and compacted permeable hardstanding in the aggregates storage areas. The IBA storage building is adjacent to the rail siding running along the eastern side of the depot, which is used to load trains with IBA and unload aggregates. To the north of the building are the vehicle wash facilities and equipment stores. The road between the IBA building and the rail track, used to access the IBA building is also the traffic route for lorries and plant leaving the southern yard area.

To the south of the storage building there are water storage tanks for the dust suppression system and tanks for diesel (fuel) and AdBlue. Beyond the tanks, the yard area is used for storage of primary and recycled aggregates and sand.


West of the IBA building is the main vehicle access route for lorries and plant entering the aggregates storage area, and a car park for visitors and staff.

The site access, weighbridge office and welfare facilities are located to the northwestern corner of the site.

Access and Site Security

The following security measures are implemented to prevent unauthorised access:

- Security fencing:
- Security gates - the gates to the depot are closed and locked whenever the depot is unattended:
- Authorised access system - all visitors to the depot are required to sign in and sign out, in the visitors' book which is held at the Weighbridge/Site control office:
- Remote CCTV monitoring of the depot:
- Security lighting.

The security measures are inspected at the commencement of each working day using  [Daily Site Inspection.docx](#). Any defects or damage which compromise the integrity of the site security is temporarily repaired by the end of the working day and permanent repair made as soon as practicable.

In the event of a breach of security at the depot, management is informed. The cause is investigated and appropriate mitigation measures implemented. Details of the breach, the investigation and actions taken is noted in the Site Diary/Log.

Site Identification Board

A site Identification Board is located and maintained at the entrance to the depot and includes the following information:





- Permit Holder's name;
- Emergency contact name and telephone number;
- A statement that the site is permitted by the Environment Agency;
- The Permit number; and
- Environment Agency telephone number 03708 506506 and the incident hotline number 0800 807060 (or another number, if the EA have requested it in writing).

Maintenance of Fixed Infrastructure

Environmental Management Plan (Newhaven Rail)

Site infrastructure i.e., fences, site roads, lighting etc., is inspected on a regular basis by depot staff. Should any repairs be required or conditions likely to give rise to a pollution risk, they are noted in the Site Diary/Log and actioned within five working days.

Mobile Plant

Depot staff are responsible for ensuring all plant is maintained in good working condition with regular inspections recorded using  [Daily & Weekly Excavator Maintenance Checklist.docx](#),  [Daily & Weekly Telehandler Maintenance Checklist.docx](#),  [Daily & Weekly Wheeled Shovel Maintenance Checklist.docx](#) and  [Daily & Weekly Tractor and Trailer Service Record.docx](#).

Testing and maintenance is undertaken in accordance with the manufacturer's specifications and/or company policy. The mobile plant that is used on site includes (but is not limited to):

- Loading shovel;
- Excavator;
- Telehandler;
- Tractor and tipping trailer;
- Sub-contract road sweeper.

Records are maintained of all servicing and calibration of equipment/plant held in the Site Office.

Equipment & Stores

The Company's Engineering department manages critical spares that are available across multiple locations and has access to specialist suppliers as required. Where possible there is a large degree of commonality between spares across sites.

3 Operations

The depot receives Incinerator Bottom Ash (IBA) for storage, maturation and onward transfer to another Day Group depot for recycling. No hazardous waste is accepted at the depot.

A typical intake of 170 tonnes of material per day is received at the depot. The maximum quantity of IBA waste permitted through the depot is 75,000 tonnes per annum, currently operations are running in the region of 40-50,000 tpa.

3.1 Permitted Waste Operations

The depot receives Incinerator Bottom Ash (IBA) for storage, maturation and onward transfer to another Day Group depot for recycling. Waste handled at the Depot is transferred for recovery operations elsewhere.

Environmental Management Plan (Newhaven Rail)

3.2 Waste Acceptance Procedure

The depot is Permitted to accept the waste, as listed in the Permit.

Waste Code	Description
19	WASTES FROM WASTE MANAGEMENT FACILITIES, OFF-SITE WASTEWATER TREATMENT PLANTS AND PREPARATION OF WATER INTENDED FOR HUMAN CONSUMPTION/INDUSTRIAL USE
19 01	wastes from incineration or pyrolysis of waste
19 01 12	bottom ash and slag other than those mentioned in 19 01 11

Acceptance

To ensure that only the permitted waste types are accepted, all waste arriving at the depot is subject to the Company's [IBA Acceptance Quarantine and Production Recording.docx](#).

All incoming IBA is collected from the Newhaven Energy Recovery Facility (ERF) by a Day Group operative in a tractor and trailer. The tractor and trailer pass over the ERF incoming and outgoing weighbridges to determine the load weight and a waste transfer note provided by Veolia, the ERF operator. The material is then driven to the Newhaven Depot and tipped in the IBA storage building. A site operative will carry out a visual inspection of the load prior to tipping. This is carried out in accordance with [Procedure and RA - IBA Collection \(Newhaven Rail\).docx](#).

Due to the nature of the proposed activities, no other waste materials are expected to be delivered to site.

3.3 Waste Storage

The IBA is stored to take account of the following:

- The IBA is stored within a building during its maturation process. The storage is on impermeable concrete with sealed drainage.
- Storage time - the raw IBA material requires a suitable maturation period.
- Maximum capacity for waste stored on site - 5,000 tonnes of raw IBA.
- Maximum height of each storage pile on site is limited by the footprint of the IBA building and the need to maintain 1m freeboard space against the concrete bay walls.
- Ensuring only permitted waste types are received - by following [IBA Acceptance Quarantine and Production Recording.docx](#).

3.4 General Process Description

Following completion of the waste acceptance procedure, and tipping of the raw IBA in the storage building, it is stockpiled in a bay, left to mature in order to achieve the appropriate pH level, and turned regularly to prevent cementing.

IBA is subject to sampling and testing by the EFW operator in line with the most recent version of [ESA IBA Sampling & Testing Protocol](#), to confirm its non-hazardous status. [IBA Acceptance Quarantine and Production Recording.docx](#) sets out the Day Group procedure for recording the identification of sampled loads of IBA. IBA storage is recorded on [Procedure and RA - IBA Collection \(Newhaven Rail\).docx](#).

There is a self-imposed height restriction on stockpiled material in the building, to allow 1m of freeboard space at the top of the concrete walls. The material is graded using a hydraulic excavator.

Environmental Management Plan (Newhaven Rail)

After the producer of the IBA has confirmed in writing that the IBA test results confirm a non-hazardous status, the relevant batch of IBA is loaded onto a train by a 360 excavator with grab attachment and transported to Day Group's Brentford depot. Typically each train carries approximately 1,000 tonnes of IBA.

Wastes leaving the depot are transported in accordance with waste Duty of Care legislation. Day Group is a Registered Waste Carrier.

An automatic water-based dust suppression system operates within the storage building to prevent emissions of dust and to maintain the correct level of moisture within the unprocessed material. The suppression system is operated while trains are being loaded, in accordance with [Procedure and RA - IBA Collection \(Newhaven Rail\).docx](#). These measures include

- Mist curtain in operation on the front of the building whenever the ash is being moved or a train is being loaded.
- Water cannon also in operation when the train is being loaded.
- Rain guns inside the building are used on all ash in storage to prevent it from drying out.

The IBA storage building has an open front and vented ridge thus preventing a build-up of explosive/flammable gas.

3.5 Fuel and other Raw Material Delivery, Handling and Storage

Apart from the raw IBA, the main deliveries to the depot will comprise diesel fuel for the refuelling of mobile plant on site. This is delivered by road and decanted into a 7.5m³ (7,500 litres) double skinned, bunded storage tank. A member of staff is responsible for ensuring that the delivery is carried out in accordance with [Procedure and RA – Accepting Fuel & Oil Deliveries.docx](#).

All filling points, vents, gauges and sight glasses are located within the bund. Any pipework is located within the bund also, providing protection against incidental damage. In line with the Oil Storage Regulations for Businesses (May 2015), all filling points and tank overflow pipe outlets are arranged so any fuel coming out of them will go vertically down into the bund.

Oils and greases required for maintenance activities are delivered by road in small drums and containers. These are offloaded into the designated storage area, which is within a metal shipping container with drip trays under all barrels. The storage capacity of drip trays is greater than 110% of the largest container, or 25% of the total quantity stored, whichever is largest. All deliveries are supervised by a trained operative.


4 Management of Operations

The depot is run by technically competent management with a Certificate of Technical Competence (COTC) to Level 4 - Treatment/Transfer of Non-Hazardous Waste. A copy of this Management Plan, the Environmental Permit and COTC certification is kept available on site, in digital format, for reference.

4.1 Daily Site Inspection


Upon arriving at the depot at the start of each day, the staff will inspect the site to ensure that there have been no incidents overnight. The inspection checks the entire site infrastructure is intact and free from any obstructions covering the access, fencing, gates and drainage provisions and is recorded in


Environmental Management Plan (Newhaven Rail)

 [Daily Site Inspection.docx](#). Any waste storage areas are checked to ensure that the material has not been disturbed. The mobile plant and monitoring equipment is also checked to ensure it is fully operational.

Any defects identified by the initial site inspection is appropriately rectified by the depot staff immediately. Where it is not possible to rectify any defects immediately, the depot will not open unless operations can take place without any increased risk of pollution. The Depot Manager will make this decision and record details of the incident, detailing its cause(s) and any remedial measures employed in the Site Diary/Log. Senior management will also be informed of the incident.

Upon completion of the daily initial site inspection confirming normal operating conditions, with the completion of any necessary remedial actions, the site will accept waste.

A more detailed site inspection is carried out monthly using  [Monthly Site Safety and Environment Inspection.docx](#). Should any repairs be required, they are noted in the Site Diary/ Log and actioned within five working days.

A daily  [Depot Briefing Agenda.docx](#), is used by the Depot Manager and Logistics Coordinator to record incoming and outgoing stock levels, this information is used to ensure permitted storage capacities are not exceeded and to communicate workload and issues with depot staff. This information is also recorded on the site whiteboard and may be communicated via photos of the whiteboard being shared daily.

At the end of each working day, depot staff will ensure that all mobile plant and infrastructure is secured, the site is left in a tidy condition and the depot gates are locked and left secure.

The depot operates during the following hours, although there may be occasional operations carried out outside these hours, such as raw material being brought to site or train loading:

- 0700 to 1700 hours Monday to Friday
- 0700 to 1200 hours on Saturdays.

5 Environmental Control Measures

5.1 Dust

Appropriate measures taken:

- A dust suppression system covers all stockpiles and road areas on the site. It is used to add moisture to stockpiles and roads to prevent wind whipping and resuspension of dust during loading, tipping and vehicle movements. The system runs on a timer programmed by the Depot Manager with adjustments made according to the weather conditions. The system has a manual override and is therefore available for use in damping down dust arising in any particular area or in emergency situations.
- IBA is stored and matured in a three-sided building with mist curtain on the building opening.
- Mist cannon available for dowsing problem areas.
- All loaded vehicles are sheeted with instruction provided to employee and sub-contract drivers.
- Additional controls listed under the Mud and Debris section below prevent resuspension of dusts from vehicle movements.

Environmental Management Plan (Newhaven Rail)

- Good housekeeping to prevent resuspension of dusts by vehicle movements and wind whipping.

5.2 Pests & Vermin

The IBA building being sheltered and slightly warm from the recently delivered IBA may be an attractive nesting site for birds. Netting has been fitted to the inside of the IBA building to prevent birds from nesting in the building.

Due to the materials handled onsite the site is unlikely to be susceptible to pests or vermin. Should vermin be seen, traps can be set around the site which would be managed and controlled via a contract with an approved pest control company. Existing procedures in place to reduce the potential for odour, (such as the nature and control of incoming materials and tidying of any litter), will in themselves reduce the propensity for pests.

5.3 Noise & Vibration

Appropriate Measures taken:

- Depot operating hours limited to daytimes.
- Mobile plant subject to regular inspection and maintenance and uses white noise reversing alarms.
- Company and sub-contract drivers trained to switch off engines when stationary and avoid over revving.

The noise levels are continuously monitored by the depot staff and it is the Depot Manager's responsibility to identify and control any excessive noise which occurs. Any excessive noise noted or complaints received will be logged within the Site Diary/Log. The Depot Manager will investigate the complaint and will take action to identify the source of the noise and implement remedial measures where appropriate.

5.4 Odour

The nature of the materials handled at the Site means they should generally not be malodorous. It is the Depot Manager's responsibility to monitor waste operations to ensure any malodorous material is dealt with in accordance with the action plan set out below. The potential for material to produce odour increases with the length of time that material is kept on site at the site. To address this potential, the following is in place:

- The volume of incoming material will not exceed the storage capacity of the IBA building;
- The incoming wastes will be carefully managed with strict stock rotation so as to minimise the length of time any single load will be kept on site prior to processing.
- Odour Monitoring, the site staff monitor odour continuously during the daily operation of the site and action will be taken as appropriate to control and remediate any excessive generation. If an odour is detected then it should be recorded within the Daily Environmental Log along with remedial actions taken to control the odorous emission.

5.5 Litter

The overall risk presented by the escape of litter from the Site is negligible due to the type of waste being handled. Site staff maintain a visual assessment throughout the working day for windblown litter, both inside and outside the site. Any windblown material is cleared, including any windblown litter off site. In this instance, a record of the event and the actions taken is recorded in the Site Diary/Log.

Environmental Management Plan (Newhaven Rail)

Any spillage of materials on the highway is dealt with by sweeping the surface with a mechanical sweeper unit and/or litter picking, if required. Details of any spills outside the site or on the highway, and actions taken, are recorded in the Site Diary/Log.

5.6 Mud and Debris

In order to prevent the deposition or tracking of mud or debris from the site onto public areas and highways, the following measures are put in place:

- Hardstanding is maintained free of significant quantities of mud and debris;
- All operational areas are subject to monitoring by staff throughout the working day to identify accumulations of mud requiring remedial action;
- A sub-contract road sweeper is deployed daily to remove any mud and debris tracked from the Depot haul roads and prevent it being tracked onto the highway;
- All vehicles leaving operational areas are, before leaving the site, cleaned as necessary and checked to ensure that they are clear of loose waste and that any products being exported from the site are secure; and
- All lorries are sheeted when loads are being carried to and from the site. Any non-Company vehicle which repeats a non-sheeting offence is refused access to the site.

In the event that mud, debris or waste arising from the depot is deposited onto public areas outside the depot, the following remedial measures are implemented:

- The affected public areas outside the depot are cleaned; and
- Traffic is isolated from sources of mud and debris within the depot to prevent further tracking of mud and debris, and measures taken to clear any such sources as soon as practicable.

It is the Depot Manager's responsibility to manage depot cleanliness. Relevant actions taken are recorded in the Site Diary/Log.

5.7 Discharge of Wastewater

Much of the yard at Newhaven is permeable and allows surface water to run off to the ground. The IBA building and loading area drains into contained drainage at the back of the building, is settled then recirculated into dust suppression. The office wastewater is collected in a tank and removed by licensed tanker operators.

5.8 Loss of Containment

Loss of containment can lead to spillage and leakage of potentially contaminating liquids. To prevent loss of containment and minimise the risk and impact of releases, the following measures are implemented:

- Containment system - tanks containing potentially polluting liquids is constructed so that any leaks/spills is contained. All tanks are bunded so that the bund is capable of containing at least 110% of the volume of the tank.
- Fuel tanks are fitted with level gauges to prevent overfilling and locks to prevent vandalism.
- Storage vessels - storage tanks are constructed to the appropriate British Standard.
- Inspection - tanks are inspected visually on a daily basis by depot staff to ensure the continued integrity of the tanks, and to identify the requirement for any remedial action.
- Spill kits - materials suitable for absorbing and containing minor spills are maintained on site.

Environmental Management Plan (Newhaven Rail)

5.9 Gas Build up in IBA Storage

Testing carried out to date shows that no unacceptable level of gas has been detected in or around the IBA storage building. Testing is carried out two yearly. Should this routine testing detect unacceptable levels of gas, testing frequency shall be increased

5.10 Water Health

Water on site is reused and re-circulated where feasible for dust suppression. The water is collected, settled and re-circulated. It is not used in any process and is not heated. The conditions of the system are not conducive to legionella or similar water borne diseases being developed. Odour has not been experienced, here nor at similar re-circulation systems where the water is not contained for extended periods.

5.11 Flooding

The Newhaven Rail depot is in a Flood Risk Zone 3 and is at risk of flooding from the sea. A Flood Risk Assessment carried out for planning identifies the Newhaven flood defences as providing adequate protection without further mitigation. It is the Depot Manager's responsibility to respond to the risk of flooding and to record events and actions taken in the Site Diary/Log. Actions may include temporarily ceasing accepting wastes, ceasing movements of wastes and materials around the depot and evacuating depot staff.

5.12 Fire

To prevent and minimise the potential impact of fire, the following action is taken:

- A bi-annual fire risk assessment is undertaken.
- Incompatible materials are stored apart.
- The plant inspection schedules include checks of electrical equipment within the depot to ensure that any faults are identified and repaired.
- Fire extinguishers are provided at designated locations around the site.
- Smoking or vaping will not be permitted on-site.
- Staff are trained in the assessment of fire hazards and fire prevention.
- No wastes are burned at the depot and any fire at the depot is treated as an emergency.

5.13 Waste Management

All wastes arising, and the name and details of the contractor used to collect and recycle or dispose of them are recorded on the Site Waste Register, along with their Waste Carriers Registration and Environmental Permit number. Hazardous wastes such as used spill kits and waste oils are removed by an approved contractor under a hazardous waste consignment note

6 Contingency Provisions

The depot will be shut down if conditions prevent normal working methods, such as risk of pollution or emergency situations, until normal working conditions can be resumed. Such conditions include critical failure of infrastructure e.g., failure of the drainage system; extreme weather conditions; or emergency situations such as outbreak of fire. The management plans appended to this EMP set out the specific actions for events relating to odour, noise, dust and flooding.

Management is informed immediately of any such incidents and, where appropriate, no further waste is accepted until normal operating conditions have resumed. If the depot is to be closed for more than two weeks, the Environment Agency is informed.

Environmental Management Plan (Newhaven Rail)

6.1 Mobile Plant & Machinery Failure

In the event of a breakdown or malfunction, machinery and plant are repaired and subject to a full inspection prior to commencing operation again. Spares for all consumable parts can be sourced with minimum delay. Should plant or machinery failure cause a pollution risk or emergency situation then that part of the site and any affected area is isolated and operations ceased until the situation has been assessed by the Depot Manager and deemed safe. Details of any such occurrence and necessary remedial actions is recorded in the Site Diary/Log.

6.2 Investigation of Incidents

Any incident or shutdown is investigated by the Depot Manager to establish the reasons and, where possible, instigate measures to prevent repeat occurrences. Where there is a repeated incident/failure of a piece of plant or machinery the Depot Manager shall investigate the causes, and take appropriate steps to address this including amendments to the Management Plan, if required.

A full record of the incident/shutdown is recorded in the Site Diary/Log including details of investigations and any resulting remedial actions. Details of any relevant incidents shall be forwarded to local Environment Agency officer, as appropriate.

7 Emergency Procedures

7.1 Immediate Response

Where appropriate to an incident, the immediate actions shall include:

- Raising the alarm if human health or safety is at risk.
- Contacting Emergency Services.
- Contacting the Environment Agency in the case of an environmental incident.

7.2 Secondary Actions

The appropriate procedures will depend on the nature of the incident and the potential events/failures that could lead to an environmental incident and their possible consequences together with the secondary actions to be taken to deal with the incident are outlined in sections 9 and 10.

7.3 Reporting

All incidents on site, bar minor incidental issues, are immediately reported to depot management. Full details of any incident which causes, or could cause, damage to human health and/or the environment are recorded in the Site Diary/Log. This includes:

- Date and time of incident.
- Nature of incident.
- Involvement of any third parties.
- Any remediation measures taken and results of investigation.

7.4 Investigation of Incidents

The incident/shutdown is investigated by management to establish the reason(s) for the incident and review the appropriateness of the actions taken. The investigation will, where possible, instigate measures to prevent repeat incidents.

Environmental Management Plan (Newhaven Rail)

7.5 Likelihood of Unmitigated Risks

Given the nature of the operations and the mitigation and response measures that are in place at the depot, the likelihood of an incident occurring that would impact the environment is low. Throughout this Management Plan, measures are outlined to deal with any potential environmental impact that may occur as a result of the site activities.

7.6 Management

This Management Plan, including all procedures herein, is reviewed by Senior Management on an annual basis and updated as necessary.

8 Environmental Incidents - Air

Although the likelihood of occurrence is deemed low, potential incidents that could lead to air pollution, along with the consequences of those incidents are detailed in the [Dust Management Plan](#) (DMP) for the depot.

The DMP details mitigation measures taken to prevent pollution, however in the event that an incident does occur, the following actions are instigated by the depot staff as appropriate to the incident, as outlined in section 7 above:

- Cease activities leading to excessive dust.
- Stop trucks and mobile plant from driving through the affected area.
- Turn on dust suppression system and if appropriate water sprays on mobile plant at the source of the release.
- If appropriate, reject any more loads of incoming waste likely to add to the dust emissions.
- Inform Senior Management.
- Inform the Environment Agency.

9 Environmental Incidents - Water and Land

Although the likelihood of occurrence is deemed low, potential incidents that could lead to pollution to water or land include:

- Receipt of potentially polluting non-permitted waste.
- Failure/vandalism of plant leading to the release of oil/fuel.
- Leaking fuel.

The potential consequences of these incidents could cause pollution of:

- Nearby water courses.
- Surrounding land.
- Groundwater.

Appropriate mitigation measures are implemented to prevent incidents occurring, for example, fitting fuel tanks with level gauges to prevent overfilling and locks to prevent vandalism.

However, in the event that an incident does occur, the following actions are instigated by the site staff as appropriate to the incident, as outlined in section 7 above:

- Isolate areas from further operations, or if that is not possible, prevent further material being brought to site, until normal operation conditions resume.

Environmental Management Plan (Newhaven Rail)

- Stem or contain flow of any potentially polluting liquid using sandbags, loose sand or proprietary absorbent.
- Use spill kit.
- Remove contaminated surfacing and dispose of appropriately.
- Remove the potentially polluting material to a sealed container (skip, for example) for off-site disposal.
- Inform management.

The incident shall be fully recorded as outlined in section 7 above and, if appropriate, the incident is reported to the Environment Agency immediately.

10 Environmental Incidents - Fire

A [Fire Risk Assessment](#) is in place for the depot and is subject to regular review and update.

No fires are permitted on site however it is possible that a fire could break out having been started inadvertently or deliberately (through an act of vandalism).

The potential consequences of such an incident could see pollution from:

- Fire-fighting water run-off.
- Fire spreading to adjacent land.

In response to a fire follow the  [Emergency Procedures \(Newhaven Rail\).docx](#) for the site.

The incident will be fully recorded as outlined in section 7 and the incident reported to the Environment Agency immediately.

11 Communication, Record Keeping and Document Control

Senior Management ensure that the Management Plan, and any updates or reviews, are communicated to all staff and contractors involved in the operation of the depot. The Depot Manager ensures a full and up to date copy of the Management Plan, Environmental Permit and Planning Permission is kept in the site office at all times, available for reference.

11.1 Site Diary/Log

The Site Diary/Log is a series of documents maintained by depot staff and Management, recording:

- Depot opening times.
- Daily weather conditions.
- Incidents/abnormal site conditions.
- Refused loads/unacceptable wastes and action taken.
- Details of regular daily and weekly site inspections, including any consequent actions.
- Details of regulatory inspections, with the outcome of any actions required.
- Plant breakdown/failure.
- Any incidents (human or environmental) that occur and actions taken.
- Site closures.
- Complaints and actions taken.

The Site Diary/Log is available for inspection to authorised Environment Agency officers.

Environmental Management Plan (Newhaven Rail)

11.2 Other Record Keeping

In addition to the Site Diary/Log, depot staff also keep records of:

- All waste transfer notes of the waste accepted and associated details of the delivery.
- Details of mobile plant maintenance.
- Records of staff training and review of training requirements.
- Environment Agency Compliance Assessment Reports.

All incidents and near misses are also logged within the Company "Power App", a digital recording system whereby any staff member can make an entry. Power App Tickets are assigned to a Senior Manager for review and if necessary corrective actions to be taken.

All records associated with the depot shall be kept in accordance with Permit requirements and the Company's Document Retention Procedures.

11.3 Document Control

In line with Company procedure, all documents are issued, revised and maintained in a consistent fashion. The documents that are included within the scope of document control are as follows:

- Policies and procedures.
- Responsibilities.
- Targets.
- Maintenance records.
- Monitoring records.
- Results of audits.
- Results of reviews.
- Complaints and incident records.
- Training records.

11.4 Complaints

Any complaint received at the site is immediately investigated by the Depot Manager and, where appropriate, remedial action taken. The complaint is logged on the environmental Power App which reports to the Directors within 24 hours of its receipt. The complainant is informed of the outcome of the investigation and any actions taken within five working days. Details of the complaint, including the actions taken and root cause is recorded on the Power App

11.5 Management, Site Staff and Training

Management

The Managing Director will have ultimate responsibility for all legislative requirements.

Day Group Ltd will audit site performance against the current Management Plan on an annual basis. The Management Plan itself is reviewed on an annual basis, review will not necessarily result in changes or updates.

Management will periodically review the Company's  [Environmental Policy.docx](#) and objectives.

Site Management

Direct responsibility for implementing the Management Plan is held by the Technically Competent Management who will also be responsible for interim audits of the Management Plan in response to

Environmental Management Plan (Newhaven Rail)

changes to the site's operation, company changes, incidents/incidents, complaints, and use of new plant or techniques.

Training

Management ensure that the Technical Competency is maintained in accordance with industry requirements. Suitably qualified consultancy staff will be brought in to manage the depot if this is not the case.

All depot staff receive a site induction when they commence on site. The depot staff are suitably trained in their roles and responsibilities with on-site training by the Technically Competent Management, to ensure that they conduct their duties in compliance with the Management Plan. Additional training requirements are reviewed annually, or if there are any procedural changes or changes in plant. An assessment of the training needs is carried out to identify the posts for which specific environmental awareness training is needed, and the scope and level of such training. The assessment of training needs is reviewed on an annual basis.

The training programme will ensure that all relevant staff are aware of the following:

- Regulatory implications of the permit for the depot and their specific work activity.
- All potential environmental effects of operations under normal and abnormal circumstances.
- The need to report deviations from the permit.
- Prevention of incidental emissions and action to be taken should incidental emissions occur.

Management will periodically review the Company's environmental policy and objectives.

12 Reporting Non-Compliance and Taking Corrective Action

The Company procedures in place ensure corrective action is taken in response to problems identified at the depot. The procedures ensure that non-conformances are reported, investigated and rectified, and that incidents and near-misses are prevented. The following aspects are considered:

- Actual or potential non-compliance.
- System failure discovered at internal audit.
- Suppliers or subcontractors breaking the agreed operating rules.
- Incidents, incidents and emergencies.
- Malfunction, breakdown or failure of plant.
- Complaints.

The action taken in response to the non-conformance may include:

- Obtaining additional information on the nature and extent of the non-conformance.
- Discussing and testing alternative solutions.
- Modifying procedures and responsibilities.
- Seeking approval for additional resources and training.
- Contacting suppliers and contractors.

A formal internal auditing procedure will ensure the depot is audited annually and that the progress of corrective and preventive action is monitored by the Directors.

Senior management will review environmental performance and ensure any necessary actions are taken.