



Health, Safety & Environment

Environmental Management Plan (Purley)

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Appendices

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

 [Compliance Obligations Register.docx](#)

 [IMS Manual.docx](#)

 [Depot Decommissioning Plan.docx](#)

 [Disaster Recovery Plan \(Purley\).docx](#)

Drawings

[PU031-01 Rev0 Overall Site Drawing.pdf](#)

[PU031-02 Rev0 Dust Suppression Layout.pdf](#)

Environmental Management Plan (Purley)

1 Introduction

This document details the Environmental Management Plan for Day Group Ltd to accompany the Environmental Permit for the recycling of Construction and Demolition (C&D) waste to produce aggregate at Approach Road, Purley.

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 Site is located along Approach Road, next to Purley train station in Purley, on the southern periphery of London. The National Grid Reference for the Site is 531544, 161434.

2.2 Operator Details

Day Group Limited
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) and holds a relevant WAMITAB qualification.

Directors:

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

Competent Person(s):

- Mark Norris - WAMITAB Level 4 Treatment / Transfer of Non-Hazardous Waste

Responsible Person(s):

- Wayne Bowbrick - EPOC

Site Staff:

Position	Role	Relevant Qualifications
Depot Manager	Overall management of the depot.	WAMITAB Level 4 COTC

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Deputy	Controlling day to day production and maintenance activities.	WAMITAB EPOC
Weighbridge Operator	Controlling vehicle movements, inspections and site security.	
Plant Operator	Operation and maintenance of processing plant.	QCF Level 2 and Operator Licence
Shovel Operator	Stockpiling materials, feeding plant and loading materials.	QCF Level 2 and Operator Licence
Excavator Operator	Stockpiling materials, breaking up oversized material.	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 required due to illness or holiday, other staff are deployed at this site, 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 site is provided on the Depot noticeboard.

2.4 Site Layout & Maintenance

Site Layout

A detailed site layout can be seen in [PU031-01_Rev0_Overall Site Drawing.pdf](#). This plan is subject to update and change as the site develops.

The site surfacing largely comprises impermeable concrete hardstanding, with the southern quarter laid mainly to compacted hardcore. Two office blocks and the car park are in the western corner with a lorry workshop fuelling area immediately to the south. The incoming and outgoing weighbridges are located either side of the northerly office block.

A building housing the C&D processing plant is located relatively centrally on the eastern site boundary whilst a conveyor and storage bays run in a southwest to northeast line, terminating in another building used for unloading of inbound trains.

A mobile processing plant is located in the yard next to the C&D processing plan building. This is used periodically.

Access & Site Security

The following security measures are implemented to prevent unauthorised access:

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- 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 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 a 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.
- Environment Agency telephone number 03708 506 506 and the incident hotline number 0800 807 060 (or another number, if the EA has requested it in writing).

Maintenance of Fixed Infrastructure

Site infrastructure i.e. fences, site roads, lighting etc., is inspected on a regular basis by site 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

Site staff are responsible for ensuring all plant is maintained in a good working condition with regular inspections, testing and maintenance 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
- 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

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3 Operations

The Depot is used to recycle non-hazardous construction and demolition waste to produce high grade aggregates.

No hazardous waste is accepted at the depot.

A maximum of 250,000tpa is accepted at the site for the production of aggregates. The depot produces a range of high quality recycled and graded aggregate products, predominantly at <20mm. Production runs are varied on a day-to-day basis to enable the Company to supply its customers with the required products.

A maximum of 10,000 tonnes of IBAA is stored on site at any time.

It is Day Group's aim that less than 1% of the material imported for recovery/recycling is disposed of as waste residue.

3.1 Permitted Waste Operations

The main treatment objective at the Depot is recovery of C&D Waste. The following permitted waste operations take place on site:

- R3: Recycling/reclamation of organic substances which are not used as solvents
- R5: Recycling/reclamation of other inorganic materials
- R13: Storage of waste pending the operations numbered R1, R4 and R5

3.2 Waste Acceptance Procedure

The depot accepts the following categories of waste. Notwithstanding the specification of permitted waste types, wastes which consist solely of, or mainly of dusts, powders, liquids, sludges or loose fibres are not to be accepted at the depot.

Waste Code	Description
10	Waste from thermal processes
10 13	Waste from manufacture of cement, lime and plaster and articles and products made from them
10 13 14	waste concrete
15	Waste packaging, absorbents, wiping cloths, filter materials and protective clothing not otherwise specified
15 01	Packaging
15 01 07	clean glass
17	Construction and demolition wastes (including excavated soil from contaminated sites)
17 01	concrete, bricks, tiles and ceramics
17 01 01	concrete
17 01 02	bricks
17 01 07	mixtures of concrete, bricks, tiles and ceramics other than those mentioned in 17 01 06
17 03	bituminous mixtures, coal tar and tarred products

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Waste Code	Description
17 03 02	road base and road plannings (not containing coal tar)
17 05	soil (including excavated soil from contaminated sites), stones and dredging spoil
17 05 04	soil and stones other than those mentioned in 17 05 03
17 05 08	track ballast other than those mentioned in 17 05 07
17 09	other construction and demolition waste
17 09 04	mixtures of soil, brick, stones and concrete
19	Waste from waste management facilities, off-site waste water treatment plants and the preparation of water intended for human consumption and water for industrial use
19 12	Wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified
19 12 05	glass free from contamination
19 12 09	Minerals (for example sand, stones)
19 12 12	Incinerator bottom ash aggregate (IBAA)

Acceptance

To ensure that only the permitted waste types are accepted, all waste arriving at the site is subject to

 [Incoming Waste Acceptance - C&D.docx](#).

3.3 Waste Storage

The C&D Waste stored shall take account of the following:

- The maximum holding capacity of the Depot's C&D materials bay is 10,000 tonnes
- Up to 50,000 tonnes in total of waste to be stored on site at any time with 19 12 12 maximum tonnage 10,000 at any one time.
- The C&D waste materials stockpile area is managed so as the material does not exceed the self-imposed height limit of six metres and maximum storage quantities
- The C&D waste materials storage area is hard surfaced, but it is permeable, rainwater permeates into the underlying strata
- No waste shall be stored on site for longer than 12 months
- 19 12 12 IBAA is stored on impermeable surface with sealed drainage

3.4 General Process Description

C&D material is stockpiled according to its classification into concrete, hardcore or asphalt and is processed as separate production runs to ensure there is no cross contamination of products. Some elements of the C&D material may need to be pre-processed using a hydraulic 'breaker' or 'muncher' to reduce it in size and/or to remove excess reinforcing steel in order to make it suitable to feed into the primary crusher, an assessment of this is made by the plant operatives and the Depot Manager.

The material is then loaded into the primary crusher for initial size reduction. Following primary crushing, unsuitable items are removed by machine or hand depending on their size. The material then passes through a magnetic separator to remove reinforcing steel which is placed in a container for recycling. The material next passes over a primary screen to separate the >20mm fraction.

Following primary screening, the >20mm material passes through a Picking Station to remove extraneous material including non-ferrous metals, wood and plastic. The remaining material then passes through an impact crusher for final sizing and shaping. In the final stage of the process any remaining steel is removed by a second magnetic separator.

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Oversized material is fed back to the impact crusher for further size reduction. The mobile screen may also be in use, it is directly fed from the fixed plant and is used to refine the material and to make different products. The <20mm material separated during primary screening is blended with the graded material depending on the products required. The finished products are conveyed to the ground storage bays for stockpiling pending sale.

3.5 Fuel and other Raw Material Delivery, Handling and Storage

Apart from waste materials for processing, the main deliveries by road to the depot comprise diesel fuel for the refuelling of road-bound vehicles and mobile plant on site. This is decanted into double skinned, bunded storage tanks of 20m³ (20,000 litres, gas oil) and 40m³ (40,000 litres, diesel). A member of staff is responsible for ensuring that fuel deliveries are made 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 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 equipped with impermeable concrete hardstanding and drip trays and bunds where appropriate. The storage capacity of bunds 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.

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

3.6 Outgoing Waste & Products

The end products of the permitted waste operations are:

- Recycled aggregates
- Ferrous metals
- Non-ferrous metals
- Mixed residual waste (mostly wood and plastics)

All products have designated storage areas which have impermeable concrete surfacing and contained drainage.

Recycled Aggregate

Recycled aggregate products have designated storage areas to the north of the C&D process building where it can be loaded into lorries as required for sale into local markets.

Wastes and products leaving the depot are sold or moved within the UK market in accordance with waste Duty of Care legislation. Day Group and all sub-contractors used to transport waste are Registered Waste Carriers.

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4 Management of Operations

The Site 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 site at the start of each day, the staff 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 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 site staff immediately. Where it is not possible to rectify any defects immediately, the site 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 stated 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, site staff ensure that all mobile plant and infrastructure is secured, the site is left in a tidy condition and the site gates are locked and left secure.

The depot operates during the following hours with crushing operations beginning at 8am, although there may be occasional operations carried out outside these hours, such as raw material being brought to site:

- 0630 to 1730 hours Monday to Friday
- 0700 to 1300 hours on Saturdays

5 Environmental Control Measures

5.1 Dust

The site has the potential to generate dust from its operations. A dust suppression water spray system has been installed for the control of dust within the yard areas and the stocking bays. The processing plant is also fitted with dust suppression systems that are automated with a manual override.

The control of dust and particulate emissions from the site is the overall responsibility of the Depot Manager. Any activities causing excessive emissions from the site will be immediately suspended. Measures to deal with excessive emissions will include the manual operation of the water spray system

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and/or damping the operational area or suspension of a particular waste process leading to such emissions.

Further routine daily operating procedures to minimise dust emissions include the use of:

- Fixed dust suppression system covers the yard
- Enclosures or hoods are on feed hoppers and conveyor outlet points as well as point source misting on hoppers and outlet points
- A water curtain that is operated when the train is being unloaded
- Drop heights for materials are minimised
- A water bowser for mobile dust suppression to regularly suppress dust on haul roads and other trafficked areas which can be deployed elsewhere if required
- A mechanical road sweeper to ensure that both internal and external haul roads are kept clean at all times
- Vehicles entering and leaving the site are sheeted
- A vehicle wheel washing facility is provided
- Daily checks are undertaken and records kept
- The mobile plant has point source misting and covered discharge points, drop heights are minimised

Dust and Particulates Monitoring

Monitoring of dust is carried out to ensure that the site is not generating unacceptable concentrations of dust due to its operation (i.e. visible dust beyond its boundary). The monitoring consists of visual inspections of potentially problematic loads upon discharge and ongoing inspection of the site by staff during normal operations.

If it is considered necessary in order to be able to investigate persistent dust issues or should verified problems be reported by the EA or by the public, additional monitoring will only be carried out. The results of monitoring will be recorded within the Site Diary/Log along with remedial actions taken to control the emission.

In the event of significant dust escape that is likely to cause pollution or be harmful or offensive to humans, the situation will be reported to the Environment Agency.

Dust Action Plan

Should significant volumes of dust escape into the surrounding environment as a result of the acceptance of a particular waste, the waste will cease to be accepted and further loads regarded as inappropriate for handling at the site. The control measures detailed above would then be applied until the dust levels return to normal.

5.2 Pests & Vermin

Due to the materials handled on site the site is unlikely to be susceptible to pests or vermin and birds. Vermin 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

The noise levels generated from the site are those associated with the loading and unloading of materials for their subsequent acceptance, processing and recycling. Measures are taken to reduce noise generation as far as practicable which include:

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- Housing of processing plant within an acoustically clad building
- Avoiding unnecessary clanging or banging of plant or machinery or the scraping of shovels on hard surfaces
- Avoid shouting across the site and use radios where appropriate
- Avoid leaving engines idling when plant, machinery or vehicles are not in use

A bi-annual noise complaint return is submitted to the local environmental health department. The noise levels are continuously monitored on a qualitative basis by the site staff and it is the Depot Manager's responsibility to identify and control any excessive noise which occurs. Any complaint received will be logged within the Site Diary/Log along with remedial actions taken to control the emission. 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 site supervisor's responsibility to monitor waste unloading 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. To address this potential, the following is in place:

- The volume of incoming material will not exceed the annual production capability of the processing plant, thereby avoiding an unacceptable increase in raw material stock levels.
- The incoming materials 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.

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
- Where necessary, road cleaning equipment is deployed to remove any mud and debris 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

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- 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
- 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.

5.7 Discharge of Wastewater

The depot is mostly surfaced with concrete, with only the C&D waste storage area being laid with permeable hardstanding. Water to the north of the depot runs into three stage settlement pits by the Bottom Discharge Unit where the settled water is recirculated into dust suppression and the wheel wash. Water from the southern part of the yard runs into three stage settlement pits near the C&D building where settled water is discharged to foul sewer. The refuelling area drains via oil-water interceptors to the foul sewer.

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. Barrels and other containers of oils are stored on drip trays able to hold 110% of the volume of the largest container, or 25% of the total volume of all the containers.
- 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 site 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.

5.9 Water Health

Water on site is reused and recirculated where feasible for dust suppression. The water is collected, settled and recirculated. 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 recirculation systems where the water is not contained for extended periods.

5.10 Flooding

The Purley depot is not within a flood risk zone and as such is at a very low risk of flooding. 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, shutting down treatment plant and evacuating depot staff.

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6 Contingency Provisions

The Site will be shut down if site 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 an outbreak of fire. The procedures and information above set out the specific actions for events relating to odour, noise and dust. The site has a disaster plan which can be implemented if required.

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

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 the local Environment Agency officer, as appropriate.

6.3 Decommissioning Plan

Should there be a need to close the site the site decommissioning plan is followed to ensure that all waste is removed from site, all buildings and equipment are safely removed and that the site is secure.

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 8-10.

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7.3 Reporting

All incidents on site, bar minor incidental issues, are immediately reported to site 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.

7.5 Likelihood of Unmitigated Risks

Given the nature of the operations and the mitigation and response measures that are in place at the site, 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 any update deemed necessary noted.

A list of emergency contacts and their details are provided on the site noticeboard.

8 Environmental Incidents - Air

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

- Receipt of potentially polluting non-permitted waste
- Receipt of excessively dusty wastes
- Failure of the dust suppression system

Routine control measures to prevent emissions of dust are listed in section 5 above. In the event that an incident does occur, the following actions are instigated by site 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

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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 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 operational conditions resume
- 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

No fires are permitted on site. With the exception of incidental quantities of wood, paper and card imported amongst C&D waste, flammable materials are not accepted. However, it is possible that a fire could break out on site 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 from site
- Fire spreading to adjacent land

In response to a fire follow the Emergency Procedures for the site.

The incident will be fully recorded as outlined in section 7 above and the incident reported to the Environment Agency immediately. Site staff are suitably trained in fire-fighting procedures.

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

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- 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 is not permitted on site other than in designated areas
- 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

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 site. The Depot Manager ensures a full and up to date copy of the Management Plan and Environmental Permit 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 site staff and management, recording:

- Site 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.

11.2 Other Record Keeping

In addition to the Site Diary/Log, site 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 action is to be taken.

All records associated with the site 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

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- 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 has ultimate responsibility for all legislative requirements.

Day Group Ltd 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 is also responsible for interim audits of the Management Plan in response to changes to the site's operation, company changes, incidents, complaints, and use of new plant or techniques.

Operational Staff

All site staff receive a site induction when they commence on site. All site staff involved in the operations receive training appropriate to their role, with refresher training carried out annually. Additional training requirements are reviewed annually, or if there are any procedural changes or changes in plant.

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 site if this is not the case.

All site staff receive a site induction when they commence on site. The site 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 ensures that all relevant staff are aware of the following:

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- 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.

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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 sub-contractors breaking the agreed operating rules
- 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 Production Director.

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