

MultiPanel (UK) Limited

ENVIRONMENTAL POLICY STATEMENT

Our core business is plastics recycling and pelletisation of LDPE waste. This involves collection, treating and the recovery of copper materials for recycling purposes. It is our aim to improve the local and global environment in which we operate, and to prevent pollution of the environment.

We are committed to compliance with all relevant legislation, regulations and other industry codes. As an integral part of this commitment, we will ensure that all emissions to water, land and air are within regulatory constraints and to strive to minimise the effect we have upon the environment through our commitment to continual improvement.

It is our policy to promote environmental awareness throughout the Company and to ensure that operatives receive appropriate training relating to environmental issues.

Clients of Multipanel Limited will be made aware of the Company's Environmental Policy.

It is an integral element of our policy to ensure open and clear communication of our objectives and achievements to all interested parties.

We have a commitment to monitoring our performance with regard to environmental issues, and the subsequent performance improvements. Regular objectives will be set and reviewed by Company's management

Signed.....Kay Roberts.

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INTRODUCTION

This manual and associated Procedures represents the formal Environmental Management System (EMS) for MultiPanel (UK) Limited.

This system has been documented to achieve and demonstrate sound environmental performance by controlling the impacts of the company's activities on the environment consistent with our policy. The EMS supports compliance with the Environmental Permit to be operated at the site.

Company Profile

MultiPanel Limited operates from Unit 1-4 Mill Yard Way, Eythorne CT14 4NL predominantly as a plastics recycling site.

Site operating hours are as follows:

- o Monday to Sunday: 0800 to 0800

Scope of System

The scope of our environmental management system covers "The recycling of waste LDPE plastics".

The purpose of this manual is to define the EMS, which will ensure that the company activities are conducted in a manner which will minimise adverse environmental impacts and enhance our role in environmental stewardship.

The procedures that implement the EMS apply, where appropriate, to the company activities at MultiPanel Limited and are operated under the same common management system.

Environmental Risks and Effects

The company has identified and documented its Environmental aspects and Impacts below to identify the environmental aspects of the activities and determine those which have, or may have, a significant impact on the environment. Where necessary operational controls have been implemented to minimise any potential impact on the environment.

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Legal and Other Requirements

The key legislation and other requirements which establish the main environmental control over the company's activities are defined within the Register of Environmental Legislation. Where appropriate, operational controls have been implemented to ensure compliance with relevant legislation.

Environmental Improvement Programme

Objectives and Targets, with defined responsibilities for their monitoring, achievement and timescales have been documented:

Environmental Objectives will be established on an annual basis taking into account:

- The Environmental Policy;
- The significant environmental aspects based on the Risk Assessment;
- Results of the Audits;
- Legislative and other requirements; and
- Views of relevant stakeholders.

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Operation & Maintenance

Operations and activities associated with environmental aspects are controlled by operational procedures referenced in this manual.

Accidents and Incidents

The Company has established and maintains a procedure for incident and accidents in section 1.7 of this manual.

Non-conformance, Incidents and Complaints

The Company has established and maintains a procedure for recording Non-conformance, incidents and Complaints in section 1.8 of this manual.

Environmental Risk Assessment

The risk assessment below constitutes the typical risks present at MultiPanel Limited in Dover and identifies generic risks which are deemed to be applicable to the business.

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Hazard	Receptor	Pathway	Risk management	Probability of exposure	Consequence	What is the overall risk?
Noise from delivery and unloading of materials	Adjacent businesses on or close to Mill Yard Way.	Air - Activities on site are potentially audible at other properties.	Ensure activity undertaken in accordance with operating procedures. Activity location benefits from being close to other businesses and away from residential dwellings. Record and act on complaints. Limit hours of noisy works to 09:00-17:00	Medium	Annoyance or nuisance to the other business users especially during warm summer months.	Medium
Noise from the FLT/mini digger from moving materials inside the warehouse	Adjacent businesses on Mill Yard Way	Air - Activities on site are potentially audible at other properties particularly gardens (no nearby residents) if any in the vicinity	Ensure activity undertaken in accordance with operating procedure Activity location benefits from being in an industrial area with no close-by residential properties nearby.	Medium	Annoyance or nuisance to Adjacent businesses on industrial site especially during warm summer months.	Low
contaminated rainwater runoff from metals storage	Groundwater	Indirect run-off through the soil layer, through current unmade ground.	Impermeable base in car park and building areas Ensure regular inspections of impermeable surface and repair of damaged areas. Ensure regular integrity testing of storage vessels (diesel) and drains.	Low	Contamination of groundwater	Medium
Firewater control	Groundwater	Indirect run-off through the soil layer, through cracks in impermeable surface or leaks from minor spills and metals run-off	Firewater run off can possibly enter the groundwater via the same routes as rainwater. Rubber mats and bungs to prevent pollution of the surface water system via S/W gullies	Low/medium	Potential contamination of groundwater	Medium

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<p>Leak from diesel storage drums/tanks containment failure of bunds and impermeable surface</p>	<p>Groundwater</p>	<p>Through cracks in impermeable surface then indirect run-off through the soil layer.</p>	<p>Ensure maintenance checks of the bunds and over ground storage tanks are undertaken in accordance with the maintenance programme and checks are recorded.</p> <p>Ensure the inspections of the impermeable surface are undertaken in accordance with a maintenance programme.</p> <p>Ensure appropriate staff are fully trained in the operational and spills procedures</p>	<p>Low</p>	<p>Contamination of groundwater</p>	<p>Low</p>
<p>Arson or vandalism causing the release of pollution material to air, water or land</p>	<p>Adjacent businesses on industrial site</p>	<p>Air transport of smoke or spillages and contaminated firewater by direct runoff form site.</p>	<p>Gates are closed and locked outside of office hours to block access further.</p> <p>Regular checks of the Perimeter fencing and gates</p> <p>The building is secured when not in use.</p> <p>Only one entrance/ exit points to the site to/ from the public highway is in place, which is secured.</p>	<p>Low</p>	<p>Harm to health respiratory irritation</p> <p>Pollution of water via off site surface water drainage or adjacent land.</p> <p>Vandalism to diesel storage areas</p>	<p>Low</p>

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Flooding of site	Adjacent businesses on Mill Yard Way	Flood waters	The site is not in a flood-zone All storage vessels have secondary containment Ensure onsite drains are kept clear	Medium	If waste is washed off the site it may contaminate neighbouring businesses or streams.	Medium
Discharges to surface water from car park	Surface water and nearby drains	Overflow from main site into S/W gulleys in car park	In times of heavy rainfall, the S/W from the yard areas may flow into the S/W drains.	Medium	Overflow or back up from the car park may enter S/W gulleys on site	Medium
Drains blocked and site water backing up	If car park gullies blocked could back up to surface water gullies	Overflow from main site to S/W gullies	In times of heavy rainfall, the S/W from the yard areas may flow into the S/W drains in the car park or overflow. Yard areas and gulleys will be checked on a monthly maintenance regime	Medium	Overflow or back up from the car park may enter S/W gullies on site or off site	Medium

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1.4 Legal Register

Legislation	Relevance	Applicable to which processes	Where held?	Person responsible for compliance
Environmental Permitting (Amendment) Regulations 2012	The site requires an environmental permit to operate. Environmental permitting is a risk-based regime for regulating business activities that could have an impact on the environment or human health.	Storage, handling and treatment of waste on the site	Copy held in site office	Owner
Environmental Protection Act 1990 (Part II & Part III)	Defines the legal framework for duty of care for waste, and statutory nuisance.	The transfer of waste from site and the impact of operations on neighbouring residents.	Copy held in site office	Owner
Provision and Use of Work Equipment Regulations 1998 (PUWER)	Establishes requirements for those owning and controlling equipment used at a work's premises	FLT/mini digger	Copy held on site	Owner
Health & Safety at Work Act 1974	Establishes requirements for risk assessment for those working in potentially	Working close to machinery Operating machinery	Copy held on site	Owner

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Legislation	Relevance	Applicable to which processes	Where held?	Person responsible for compliance
	hazardous conditions			
Waste Framework Directive 2008/98/EC	Lays down controls for the safe disposal and recovery of waste. Article 13 lays down the objective that waste is recovered or disposed of without endangering human health and without using processes or methods that could harm the environment.	All site storage handling and treatment of waste on site.	Copy held in site office	Owner
Control of Pollution (Oil Storage) (England) Regulations 2001	Applies where oils including (petrol, diesel, mineral oils) are stored on site in containers larger than 200 litres	Diesel tank	Copy held in site office	Owner
The List of Wastes Regulations 2005	Contains a harmonised list of hazardous and non-hazardous wastes	The operator needs to understand the properties of the wastes produced on site to ensure safe and secure storage and handling.	Copy held in site office	Owner
Waste (England & Wales) Regulations 2011	Duty of care requirements and information required on a waste transfer	Handling, storage and transfer of Waste	Copy held in site office	Owner

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Legislation	Relevance	Applicable to which processes	Where held?	Person responsible for compliance
	note			

1.5 Site Objectives

MultiPanel UK Limited aims to operate in a way that minimises pollution to the local environment and does not pose a threat to any of our immediate neighbours by way of pollution, noise or disturbance. Further quantified objectives will be documented after the first year of operation of this EMS.

1.6 Operational Control

MultiPanel UK Limited has developed a number of operational control procedures by which it undertakes its operations. These are listed here

- Firewater management – EP1. This procedure deals with how firewater can be contained and safely disposed of after a fire incident. This procedure replicates the firewater management section of the FPP but is detailed as a separate procedure as the impermeable surface and warehouse is integral to this mitigation method and one of the foremost pollution prevention measures on site.
- Noise management – EP2. This procedure deals with how noise impacts are monitored and minimised. It details how boundary noise is monitored and checked for daily by audible inspection and how unloading is managed at low wind weather conditions.
- Spills and incidents – EP3. This procedure deals with how spills are responded to on site and how they are cleaned up and disposed of. It details where spill kits are located and how to clean up spills and remove of the waste safely. It takes regard of protecting nearby receptors and protecting the surface water system from contamination.
- Dealing with Floodwater –EP4. This procedure deals with how flood water is managed in the event of flooding and how contaminants on site are immobilised and controlled. The procedure details how to move potential contaminants off the floor in the event of a flood and how to secure storage vessels. The procedure also details post flood clean up.

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- Site Vehicle and Machinery Maintenance – EP5. This procedure deals with how site vehicles and machinery are managed to ensure leaks and spillages do not occur. This is a maintenance regime for vehicles and machinery and how they are serviced regularly to prevent hydraulic hoses splitting etc.
- Site Inspection & neighbourly relations – EP6. This procedure deals with how MultiPanel UK Limited manages neighbours and minimises impacts on surrounding receptors. It details who to contact in the event of an incident, who the nearest neighbours are and prevailing wind direction. It acts as a checklist for daily site inspections and boundary walks.
- Drain checks – EP7. The site management regime for checking drains to ensure their integrity. It provides a visual checklist to identify any potential failure in infrastructure that may lead to an incident due to failed containment.
- Waste Processing – EP8. How waste is booked in and checked for non- conforming loads. This procedure ensures that checks on incoming waste ensures that only permitted waste is allowed to enter the site and how non-conforming loads are dealt with.
- Accidents – EP9. How accidents are responded to and their effects mitigated. This procedure details who to contact in emergency services in the event of a larger incident, which local neighbours to contact and how to prevent the incident leading to a pollution event.
- Waste Storage EP10. How waste is stored and kept whilst on site. This details where waste is kept on site, piles sizes and how the stock rotation and pile sizes are managed to ensure compliance with the permit requirements.
- Waste Acceptance EP11. How waste is accepted and paperwork completed. This procedure provides detail for ensuring that all duty of care paperwork is completed and checked for incoming loads to ensure compliance with the DoC protocol.

1.7 Incidents and Accidents

The following table references other procedures and responsibilities in the event of an emergency situation

Reference to the appropriate procedure will give further guidance.

No	Activity	Responsibility	Documentation
1	The following plan and associated supporting documents should be adhered to in the event of any of the following	Owner and all members of staff	<ul style="list-style-type: none">• Spillage Response

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	<p>environmental accidents or incidents:</p> <ul style="list-style-type: none"> • Failure of storage tanks; • Leak from oil storage tanks containment failure of bunds and impermeable surface; • Spillages of waste oil, petrol and diesel during loading and unloading; • Overfilling of vessels; • Accidental fire causing release of smoke and fumes; • Arson or vandalism causing the release of pollution material to air, water or land; and • Flooding of site. 		<p>procedure;</p> <ul style="list-style-type: none"> • Fire Response Procedure; • Accident and Incident Management Plan; • Site Plan; • Flood response • Key Site and Emergency Contacts; • List of PPE; and • Accident and Incident Record.
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1.8 Incidents and Complaints

No	Activity	Responsibility	Documentation
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1	In the event of a complaint made to the site, the complaint record must be completed, and record kept	Owner	Complaint Record
2	Site Diary	Owner	Site Diary. A daily record of unusual or abnormal events will be kept in the form of a diary which will cover the whole site.

1.9 Training & Awareness

Currently one member of staff is considered technically competent. They are Mr Mantas Blekaitis who holds WAMITAB registration. They must ensure their presence on the site exceeds 35% of the working week.

The identity of site technically competent management has been made known to all site staff.

Management will make a record of training received by site staff, to be kept for as long as the person is employed at the site

More than one operative will be trained/ available to the site, so that holiday, sickness or other absence can be covered, allowing metal recycling to continue in a manner that will not cause the site to become in breach of any licence or regulations condition relating to permitted activities. Training and Awareness of all requirements in the environmental permit and this EMS will be give to all staff within 6 months of grant of permit.

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2.0 Management Review

MultiPanel UK Limited will review and audit the contents of this EMS at no longer than yearly intervals. The review will take into account changes to the business, legislation and best practice. The system will be updated as necessary to drive continuous environmental improvement.