

CITY BATTERIES LTD

ALBION YARD, MANOR ROAD, ERITH, DA8 2AD

Environmental Management system

Facility Type:

**Hazardous waste - Commercial and Industrial
Waste Transfer Station for End-of-Life Lead Acid
Batteries**

Environmental Protection Act 1990

**City Batteries Ltd
Albion Yard
Manor Road
Erith
Kent
DA8 2AD**

Latitude 51.478623

Grid Reference TQ520777

Longitude 0.18762052

CITY BATTERIES LTD

ALBION YARD, MANOR ROAD, ERITH, DA8 2AD

Environmental Management system

CONTENTS

General Conditions:

- 1 MANAGEMENT
- 2 OPERATIONS
- 3 EMISSIONS AND MONITORING
- 4 INFORMATION

SCHEDULE 1 - SITE PLAN

SCHEDULE 2 - OPERATIONS

SCHEDULE 3 - MANAGEMENT SYSTEM

Specified Waste Management Operation

Hours of Operation

Staffing and Supervision

Engineered Site Containment and Drainage System

Site Identification Board

Site Security

Waste Acceptance and Control Systems and Procedures

Waste Quantity Measurement Systems

Specified Waste Treatment Process, Plant Equipment and Procedures

Control, Monitoring and Reporting of Aerial Emissions of Dust,

Control of Odour Emissions

Control of Litter

Site Diary

Security and Availability of Records

Storage of Waste with Specified Hazardous

Appendix 1: Environmental Aspects and Impacts Assessments

Appendix 2: Incident and Emergency Procedures

Appendix 3: Battery Breaking & Sorting

SCHEDULE 4 - INTERPRETATION

CITY BATTERIES LTD

ALBION YARD, MANOR ROAD, ERITH, DA8 2AD

Environmental Management system

General Conditions

Management

1.1 General Management

1.1.1 The activities shall be managed and operated:

- (a) following the site management system, detailed in schedule 3, which identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, and non-conformances, and will act on those drawn to the attention of the permit holder because of complaints.
- (b) By sufficient persons who are competent in respect of the responsibilities to be undertaken by them in connection with the operation of the activities.

1.1.2 Records demonstrating compliance with condition 1.1.1 shall be maintained.

1.1.3 Any persons having duties that are or may be affected by the matters set out in this permit shall have convenient access to a copy of it kept at or near the place where those duties are carried out.

1.2 Accident Management Plan

1.2.1 The permit holder shall:

- (a) Maintain and implement an accident management plan.
- (b) Review and record at least every 4 years or as soon as practicable after an accident, (whichever is earlier) as to whether changes to the plan should be made.
- (c) Make any appropriate changes to the plan identified by a review.

1.3 Site Security

1.3.1 Site security measures shall prevent unauthorised access to the site, as far as reasonably practicable.

Operations

2.1 Permitted Activities

2.1.1 The permit holder is authorised to carry out activities specified in schedule 2, table S1.1 ("the activities").

2.2 Waste Acceptance

2.2.1 Waste shall only be accepted if:

- (a) it is of a type and quantity listed in Schedule 3, table S3.1; and
- (b) it conforms to the description in the documentation supplied by the producer and holder.

2.2.2 Records shall be maintained of all waste accepted onto the site.

Emissions and Monitoring

3.1 Emissions to air, water, or land

3.1.1 There shall be no point source emissions to air, water, or land.

3.2 Transfers off-site

3.2.1 Records of all wastes sent off-site from the activities, for either disposal or recovery shall be maintained.

3.3 Fugitive emissions of substances

Company Registration number 11355830

Registered Address Albion Yard, Manor Road, Erith, Kent, DA8 2AD

Revised 2024

CITY BATTERIES LTD

ALBION YARD, MANOR ROAD, ERITH, DA8 2AD

Environmental Management system

- 3.3.1 Fugitive emissions of substances (excluding odour and noise) shall not cause pollution. The permit holder shall not be taken to have breached this condition if appropriate measures have been taken to prevent or where that is not practicable, to minimise, those emissions.
- 3.3.2 Litter or mud arising from the activities shall not cause pollution. The permit holder shall not be taken to have breached this condition if appropriate measures have been taken to prevent or where that is not practicable, to minimise, the litter and mud.
- 3.3.3 Litter and mud arising from the activities shall be cleared from affected areas outside the site as soon as practicable.
- 3.3.4 All liquid wastes, whose emission to water or land could cause pollution, shall be provided with secondary containment, unless the permit holder has used other appropriate measures to prevent or where that is not practicable, to minimise, leakage and spillage from the primary container.
- 3.4 Odour
 - 3.4.1 Emissions from the activities shall be free from odours at levels likely to cause annoyance outside the site, as perceived by an authorised officer of the Agency unless the permit holder has used appropriate measures to prevent or where this is not practicable, to minimise the odour.
- 3.5 Noise
 - 3.5.1 Emissions from the activities shall be free from noise at levels likely to cause annoyance outside the site, as perceived by an authorised officer of the Agency unless the permit holder has used appropriate measures to prevent or where this is not practicable, to minimise, the noise.
- 3.6 Pests
 - 3.6.1 Scavenging animals, scavenging birds, and other pests shall not cause pollution unless the permit holder has used appropriate measures to prevent, or where that is not practicable, to minimise, such pollution.
- 3.7 Monitoring
 - 3.7.1 This permit does not require any monitoring of the activities, emissions, or the environment.

Information

- 4.1 Records
 - 4.1.1 All records required to be made by this permit shall:
 - (a) Be legible.
 - (b) Be made as soon as reasonably practicable.
 - (c) If amended, be amended in such a way that the original and any subsequent amendments remain legible or are capable of retrieval; and
 - (d) Be retained, unless otherwise agreed by the Agency, for at least 4 years from the date when the records were made, or in the case of the following records until license surrender:
 - (i) Off-site environmental and health effects; and
 - (ii) The condition of land and groundwater.
 - 4.1.2 Any records required to be made by this license shall be supplied to the Agency within 14 days, where the records have been requested in writing by the Agency.
- 4.2 Reporting
 - 4.2.1 All reports and notifications required by the permit shall be sent to the Agency using the contact details supplied in writing by the Agency.

Company Registration number 11355830

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Revised 2024

CITY BATTERIES LTD

ALBION YARD, MANOR ROAD, ERITH, DA8 2AD

Environmental Management system

4.2.2 A summary report of the waste types and quantities accepted and removed from the site shall be made for each quarter. It shall be submitted to the Agency within one month of the end of the quarter and in the format required by the Agency.

4.3 Notifications

4.3.1 The Agency shall be notified without delay following the detection of:

(a) Any malfunction, breakdown, or failure of equipment or techniques, accident, or fugitive emission which has caused, is causing, or may cause significant pollution.

(b) The breach of a limit specified in this permit; and

(c) Any significant adverse environmental and health effects.

4.3.2 Written confirmation of actual or potential pollution incidents and breaches of emission limits shall be submitted within 24 hours.

4.3.3 Prior written notification shall be given to the Agency of the following events and in the specified timescales:

(a) as soon as practicable prior to the permanent cessation of any of the activities.

(b) Cessation of operation of all or part of the activities for a period likely to exceed 3 months.

(c) Resumption of the operation of all or part of the activities after a cessation notified under (b) above.

4.3.4 The Agency shall be notified within 7 days of any changes in technically competent management and the name of any incoming person together with evidence that such person has the required technical competence.

4.3.5 The Agency shall be notified within 14 days of the permit holder and/or any relevant person being convicted of a relevant offence, (unless such information has already been notified to the Agency), with details of the nature of the offence, the place and date of conviction, and the sentence imposed.

4.3.6 The Agency shall be notified within 14 days of the permit holder and/or relevant person appealing against a conviction for any relevant offence and of the outcome when the appeal is decided.

4.3.7 The Agency shall be notified within 14 days of the occurrence of the following matters except where Stock Exchange rules prohibit such disclosure. Where the permit holder is a registered company:

any change in the permit holder's trading name, registered name, or registered office address

any change in particulars of the permit holder's ultimate holding company (including details of an ultimate holding company where a permit holder has become a subsidiary).

any steps are taken with a view to the permit holder going into administration, entering a company voluntary arrangement, or being wound up; and

if the permit holder is not the operator: any change in the operator's trading name; address; registered name or registered office address.

4.3.9 The Agency shall be notified at least 7 days in advance of the commencement of any of the activities.

4.4 Interpretation

4.4.1 In this permit the expressions listed in schedule 7 shall have the meaning given in that schedule.

CITY BATTERIES LTD

ALBION YARD, MANOR ROAD, ERITH, DA8 2AD

Environmental Management system

SCHEDULE 1 -

SITE PLAN

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ALBION YARD, MANOR ROAD, ERITH, DA8 2AD

Environmental Management system

A Site Location Map, reference MAP1 is attached. Various other supporting maps and a basic Site Plan are included as part of the attached Phase I and II Environmental Site Assessments.

CITY BATTERIES LTD

ALBION YARD, MANOR ROAD, ERITH, DA8 2AD

Environmental Management system

SCHEDULE 2 –OPERATIONS

Table 2,0 Permitted Activities	
Description of Activity	Limits of Activity
D15 Storage pending any of the operations numbered D1 To D14 (excluding temporary storage pending collection on the site where it is produced)	Waste types and quantities should not exceed those detailed in Table 2.1 or as specified in the site environmental permit
R04 Recycling/reclamation of metals and metal components	All bulking, treatment, and transfer of waste must be carried out within the buildings
R13 Storage pending any of the operations numbered R1 to R12 (excluding temporary storage pending collection on the site where it is produced)	All Hazardous, and non-hazardous wastes must be kept within the buildings or in a secure container all waste must be kept on an impermeable surface

CITY BATTERIES LTD

ALBION YARD, MANOR ROAD, ERITH, DA8 2AD

Environmental Management system

SCHEDULE 3 -MANAGEMENT SYSTEM

MS1.1 SPECIFIED WASTE MANAGEMENT OPERATIONS

CBL (City Batteries Ltd) provides a national collection service to its customers throughout mainland UK. This service is organised from its' head office in Erith collections are made either by their trucks or for larger collections alternative licensed carriers may be used from time to time, customers may arrange for the batteries to be delivered to the site although this is not common practice. All the batteries are brought back to our premises. The process is managed and organised by the transport/weighbridge office on site. All inquiries and requests for collections are taken and processed by the transport department. Pre-acceptance checks are carried out at that time to confirm the quantity and the Chemistry of the batteries. All customers complete a pre-acceptance form (CBL/OP001) before collections are made. In those instances where insufficient information is available this is queried with the Waste Producer and a sampling and analysis service is offered, using CBL technical staff to carry out this service. CBL then confirms a collection date for the customer giving the customer adequate time to prepare and pack the batteries for transport. The onward shipment of batteries from our site for final treatment is done using fully loaded 44-tonne vehicles the loads are all pre-booked out to our approved suppliers. Following our Fire Prevention Plan, we look to have the batteries on-site for the minimum amount of time.

Once the collection has been made, the Batteries are taken back to our permitted facility in Erith where an initial check is made in line with our waste acceptance procedures to confirm the waste matches the paperwork and complies with our permit conditions, As the waste is accepted and checked we record the category of battery collected (i.e. Industrial, automotive, portable), labels and documentation are checked and completed. The batteries are then processed and made ready for onward shipment.

Specified Recovery and Disposal Operations:

- 15** Storage pending any of the operations numbered D01 to D14 (excluding temporary storage pending collection on the site where it is produced).
- R13** Storage of wastes pending any of the operations numbered R01 to R12 (excluding temporary storage pending collection on the site where it is produced).

CITY BATTERIES LTD

ALBION YARD, MANOR ROAD, ERITH, DA8 2AD

Environmental Management system

MS1.3 HOURS OF OPERATION

The site will be opened for the receipt of waste as follows:

Weekdays 08:00 – 17:00

Saturdays 08:00 – 13:00

No waste will be processed on the site on Bank Holidays.

The transport operation based at the site will have vehicles entering and leaving the site at different hours to the above as the transport operation operates 24 hours a day. However, no waste is received outside the above times.

MS1.5 STAFFING AND SUPERVISION

The site at all times will be operating under the control of a manager/supervisor who is experienced and qualified to WAMITAB standards. The site will also carry an appropriate number of trained personnel to carry out all site operations.

CITY BATTERIES LTD

ALBION YARD, MANOR ROAD, ERITH, DA8 2AD

Environmental Management system

Management System Policy

City Batteries Ltd provides a service to our customers which ensures that they are provided with the best possible products and services, whilst endeavouring to avoid harm to the environment, our employees, visitors and all others who may be affected directly or indirectly by our activities.

We shall:

- ◆ seek to establish and maintain an Integrated Management System (MS)
- ◆ seek to continually improve the effectiveness of the Management System
- ◆ seek to ensure compliance with existing and future environmental and health and safety legislation and any other initiatives or requirements to which the company subscribes.
- ◆ liaise with all relevant external bodies and work with our staff to improve our quality, and environmental performance, prevent accidents and cases of work-related ill health, and maintain safe and healthy working conditions.
- ◆ identify and seek to reduce significant environmental effects, and health and safety risks, and prevent pollution that may arise from our processes, operations, and work activities.
- ◆ provide and maintain safe plant and equipment.
- ◆ minimise waste by the reuse and recycling of materials wherever practicable.
- ◆ provide appropriate quality, environmental, and health and safety information and training for our staff, and encourage them to apply good practice, both at work and at home
- ◆ discuss quality, environmental, and health and safety issues regularly at the highest levels of the company and consult with our employees on matters affecting their health and safety
- ◆ liaise with suppliers and customers to facilitate the best possible products, safety, and environmental practices and to promote recycling.
- ◆ to review and revise this policy as necessary at regular intervals.

Sound management principles and practices shall be applied to meet these commitments and to achieve demanding and publicly available performance objectives. We shall set those objectives annually; wherever practicable, they shall be quantitative, and we shall monitor our progress towards meeting them.

Signed: *Julian Howes* (Director)

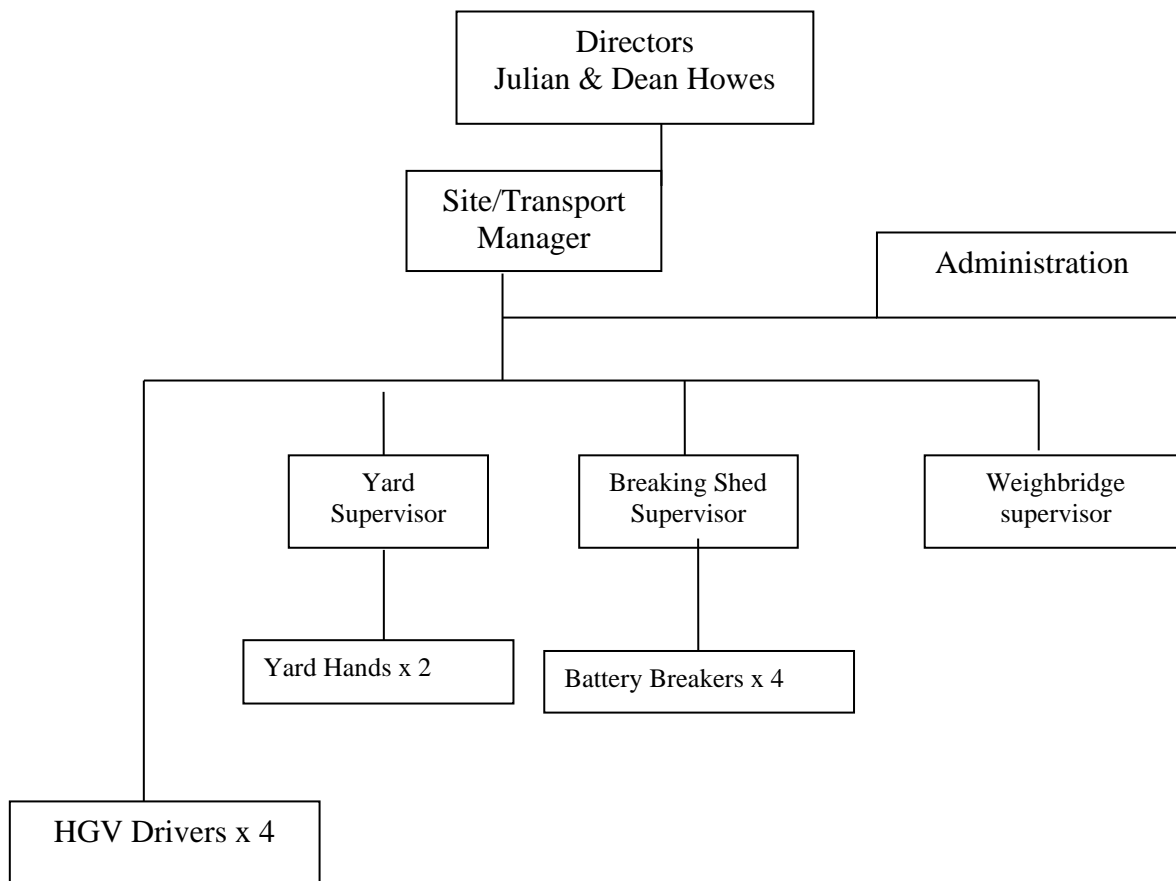
Date: 02/01/24.

CITY BATTERIES LTD

ALBION YARD, MANOR ROAD, ERITH, DA8 2AD

Environmental Management system

City Batteries Ltd – Organisation Structure



CITY BATTERIES LTD

ALBION YARD, MANOR ROAD, ERITH, DA8 2AD

Environmental Management system

Environmental Policy

City Batteries Ltd is fully aware of the impact any industrial process can have on the environment and views its involvement in the waste management industry as an opportunity to be proactive in Environmental matters wherever possible.

We believe, therefore, that we commit to

1. Maintain the highest environmental standards of treatment, ensuring full compliance with existing legislation and ensuring that all employees are trained to the highest standards and kept abreast of new developments and changes in legislation.
2. Work within the company's operating practices and maintain records as required.
3. Maintain a high standard of environmental awareness and compliance throughout the company and wherever possible, recycle materials used within our company function.
4. Evaluate all material following our procedures and develop recycling and recovery alternatives where practicable.
5. Develop new techniques and processes to reach even higher standards of treatment and efficiency.
6. Continually invest in methods and options to improve the efficiency of our activities to reduce the use of energy – non-renewable sources in particular.
7. Provide a service that will enable our customers to fulfil their Duty of Care and legal obligations under environmental legislation.
8. Provide information and guidance on environmental issues to our customers on an ongoing basis.
9. Listen to and act upon, the demands of customers to give the best practicable environmental option.

This policy will be continually reviewed and revised to ensure that our environmental objectives are achieved.

Managing Director

1st January 2024

Dean Howes

CITY BATTERIES LTD

ALBION YARD, MANOR ROAD, ERITH, DA8 2AD

Environmental Management system

MS2 (210)

ENGINEERED SITE CONTAINMENT AND DRAINAGE SYSTEM

A site plan is included within the Environmental Reports as stated in Schedule 1, which shows the site layout concerning offices and the layout of the building. The waste storage areas, the loading/unloading bay, and the main warehouse are of impermeable concrete construction.

All activities are to be undertaken within the building where there is suitable and sufficient containment and no surface water drainage. The outside loading and unloading area has a sealed drainage system, and collection points to hold and retain any spilled liquid and allow the subsequent removal by suitable pumps into replacement and sound containers or tanks. The company's Environmental Inspection Procedure is detailed below:

1. Site Environmental Inspection Procedure

This working procedure involves a simple inspection of the site's environmental aspects and a report based on the findings is given to the Quality Co-ordinator who will progress any actions with the appropriate members of staff.

2. Scope

Sections 4, 5 and 6

3. Responsibility

This procedure is to be carried out by the supervisors or site management and monitored by senior management and directors.

4. Environmental Inspection Method

4.1 The site is inspected at least every month.

4.2 The environmental aspects of each area of the site are examined. All observations and findings are recorded on the Inspection Form, which is included at the end of this procedure. The area can be classed as being satisfactory or in need of further action. The results of the inspection are reported to the Site Management who will report all inspections to the Directors, where corrective and preventative actions can be discussed. A thorough Environmental Risk Assessment of the area may be necessary to determine what further action is required (see Environmental Aspects & Impacts Assessment) Meeting minutes and all Environmental Risk Assessments are sent to the Directors. Copies of all inspections and risk assessments must be kept on file on the site for a minimum of two years.

The Environmental Aspects that require inspection include: -

Leaks and Spills.

Labelling and segregation of batteries.

Signs and warnings.

Firefighting equipment.

Emergency showers, eye wash and first aid.

Spill Boxes and spill containment. (Including booms and grate covers).

Drains and sumps.

Tanks, Pipes, and Bunded areas.

Release points.

CITY BATTERIES LTD

ALBION YARD, MANOR ROAD, ERITH, DA8 2AD

Environmental Management system

5. The areas of the Facility to be assessed are: -

Administration.

Material Storage. Non-hazardous & Hazardous Waste and quarantine areas.

Bulk Storage.

Loading and Unloading areas.

Secure compound.

Perimeter.

FACILITY AREA	COMMENTS / OBSERVATION	ACCEPTABLE	
		YES	NO
Administration			
Material Storage (Hazardous & Non-Hazardous)			
Bulk Storage			
Loading and Unloading areas			
Secure compound			
Perimeter			
Other Observation's			

Environmental Aspects:

Leaks and Spills/labelling and identification of materials / Signs and warnings / Firefighting equipment / Emergency showers, eye wash and first aid / Spill boxes / Drains and sumps / impermeable surfaces / Release points.

CITY BATTERIES LTD

ALBION YARD, MANOR ROAD, ERITH, DA8 2AD

Environmental Management system

MS3.1 SITE IDENTIFICATION BOARD

This board will be displayed at or near the entrance to the site and display the name and full address of the operating company, the daytime telephone number, and out-of-hours telephone numbers along with the contact's name. Also on the board is the out-of-hours emergency contact number for the Environment Agency. The boards also contain the operating hours for the site.

MS3.2 SITE SECURITY

The site is walled around all operating areas, with steel gates to the entrances to the site; these gates are locked outside of the operating hours. Additional security is also supplied by CCTV coverage and also at times when the site is not operating. There are intruder beams situated at strategic points around the site and these would again activate alarms outside of normal working hours at the manned centre for the site.

The office building on the site is protected by steel doors and barred windows.

MS4 (210) WASTE ACCEPTANCE, CONTROL SYSTEMS AND PROCEDURES

Introduction

MS4 (230) WASTE QUANTITY MEASUREMENT SYSTEM

The site has a fully integrated weighbridge system for weighing full loads of waste on and off the site for smaller quantities with the use of platform scales or occasionally other weighing systems, which are capable of measuring up to 1.5 Tonne pallets or batteries and are detailed by the number and size of the storage containers and this information will be entered on the transfer notes by the collection drivers. On arrival at the site, the waste details are checked against the information on the Waste Transfer Note, in particular the size and number of containers. If this is satisfactory the operator would sign against the individual entry in section B to verify all volumes are correct and would also fill in section E to complete the transfer note, where the appropriate time and date is also recorded. From this point, all of the information is transcribed from the notes to the computer system. For conversion purposes; 1lt is treated as 1kg, with minor adjustments being made either by the operator or automatically by the computerised management system itself to compensate for a significant difference in the density of any waste compared to a baseline of S.G.1. At any time, any material being delivered to the site by either weight or volume can be checked by cross-referencing the transfer note number with the computer database to give a full breakdown of all the materials, type and weight collected on individual days. The database is subject to stringent security, backup and recovery procedures to ensure data can be stored and accessed at any time. The hard copy of the transfer notes are filed on-site in date order, the carrier's copy is held by the Transport manager, and all paperwork is retained in line with current Hazardous Waste regulations.

CITY BATTERIES LTD

ALBION YARD, MANOR ROAD, ERITH, DA8 2AD

Environmental Management system

MS4 (410)

SPECIFIED WASTE TREATMENT PROCESS PLANT EQUIPMENT AND PROCEDURES

Battery Treatment processes carried out on site will be simple physical processes where the lead plates in batteries are removed from the plastic casings. The casings are shredded and bulked up the lead plates are stacked and wrapped on pallets before being shipped out, most batteries are dry cell batteries but batteries with any acid get drained and the acid is collected and sent to an approved recycler to be neutralised.

MS6 (010)

CONTROLS, MONITORING AND REPORTING OF AERIAL EMISSIONS OF DUST, FIBRES AND PARTICLES

There should be no air emissions originating from the waste received on site as all operations are within the buildings and the site itself has all hard surfaces for all working and parking areas. No dust or particles should be generated by any of our activities. We therefore believe that there will be no emissions of any dust or particles from this site.

MS6 (020)

CONTROL OF ODOUR EMISSIONS

The site itself or any of the processes undertaken on the site will not emit any odours that are likely to travel to the site boundaries. Therefore, we believe that the site would have no odour emissions and would not cause any problems in the surrounding areas. Any instance of odours being detected or reported by a neighbour or member of the public would be investigated and the details entered in the site diary.

MS6 (050)

CONTROL OF LITTER

The Site only receives Lead-acid batteries so there is very little contamination of litter, however, the yard is regularly swept and any litter along with the detritus is collected and sent as general waste.

The site is contained with boundary walls eliminating the escape of any litter. We undertake a full clean-up of the site daily as part of normal good housekeeping. If there was an escape of litter from this site, such as in windy conditions, it would be entered into the site diary with a record of how it occurred, and action taken to control and then prevent a recurrence.

Any activity that creates a litter problem would be re-assessed to eliminate the issue as all processes are continually assessed in the Environmental Aspects and Impacts Assessment.

MS7.1

SECURITY AND AVAILABILITY OF RECORDS

Security of the site is maintained with walls around all working areas. The site has main entrance gates, which are locked and secured outside of working hours.

The main office and storage buildings on site are covered by an alarm system, which has an alert back to a manned station whenever the site is not in use. The site is also covered by a range of CCTV cameras and intruder beams. Outside working hours, these are relayed back to a mobile apparatus for 24-hour monitoring, so the site is covered 24 hours a day, 7 days a week.

All the documents relating to waste collection activities are kept inside the main offices for a minimum of 12 months. After this time, they are then stored in designated archive storage. All records of waste arriving at the site are also kept in the office and backed up regularly on a separate drive.

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Revised 2024

CITY BATTERIES LTD

ALBION YARD, MANOR ROAD, ERITH, DA8 2AD

Environmental Management system

SITE DIARY

A site diary will be kept recording any significant events concerning the following:

1. Major construction work
2. Emergencies
3. Problems with waste received and actions taken.
4. Environmental problems and remedial actions
5. Inspections of the drainage system
6. Despatch of records to the Environment Agency and Site Inspections.
7. Essential plant maintenance.

CITY BATTERIES LTD

ALBION YARD, MANOR ROAD, ERITH, DA8 2AD

Environmental Management system

MS8.0

STORAGE OF WASTE Batteries

All Batteries are stored on pallets or UN-approved containers. These are stored in our warehouse as per the storage plans. The non-conforming product would be stored in the quarantine zone before being sent on to the appropriate facility for recycling.

Appendix 1

ENVIRONMENTAL ASPECTS AND IMPACTS ASSESSMENTS

Environmental Impacts

Categories of Impacts:

Impacts are considered in two categories:

Direct Impacts, under the control of the company

Indirect Impacts, normally outside the control of the company's control or which the company cannot reasonably be expected to control.

Scope of Direct Environmental Impacts:

- (i) The company's activities produce a major positive benefit to the state of the environment by eliminating or returning to the beneficial use a range of materials, which would otherwise require disposal as waste. Failure to recover such materials would result in significant additional environmental harm.
- (ii) Direct environmental impacts that are considered to be harmful are here defined as impacts that are under the direct control of the company.

Description of Direct Environmental Impacts

Emissions to Atmosphere

The company has no significant particulate emissions from its operations. There is a minor contribution from battery breaking.

CITY BATTERIES LTD

ALBION YARD, MANOR ROAD, ERITH, DA8 2AD

Environmental Management system

Effluent Discharges and Site Drainage

The operating site is fully contained, and all spillages collected and transferred into holding tanks or drums before despatch to a Treatment and facility or to suitably permitted and approved sites

All general dry waste removed from the site is classified by the company's waste disposal contractors as general dry waste. It contains used packaging materials (paper, cardboard, scrap metal, timber and fabrics), polythene bags, shrink-wrapping floor sweepings,

Energy Consumption - (significant impacts: various air pollution, water pollution and land contamination).

Environmental impacts arise from the following types of fuel / energy consumed by the company's operating units:

- Electricity
- Diesel oil (transport)

Electricity

Electricity is used for lighting, heating, power for process plant machinery and equipment, and general office and kitchen equipment. Consumption of electricity is metered by the supplier's meter. Electricity is a clean fuel in terms of its use at the site, but the company recognises that the generation of electricity has a massive impact on the environment.

Diesel Oil

Diesel oil is used on-site for forklift trucks and HGV vehicles. By far the biggest consumption is on road going diesel for use in collection vehicles. The company is aware of the environmental impact of its transport operation and is looking at alternative fuel sources for the fleet including Biodiesel and electrically powered vehicles.

Water Consumption - (significant impacts: water pollution)

Water consumption on the site is minimal. Offices would use limited amounts for kitchen and washroom activities. There is no borehole water abstraction or abstraction from any other controlled water source.

CITY BATTERIES LTD

ALBION YARD, MANOR ROAD, ERITH, DA8 2AD

Environmental Management system

Materials handling and Storage - (significant impacts: various air pollution, water pollution, and land contamination)

The working plan for the site lists the materials and amounts, including wastes, which are allowed to be stored. Contingency plans for spillages, leakages, accidents or emergencies involving materials handling and storage are addressed in the working plan or specific working instructions.

Packaging Materials - (significant impacts: various air pollution, water pollution and land contamination)

Most packaging materials used by the company consist of paper, cardboard, plastic wrapping (including shrink wrapping) and timber (pallets). Their environmental impacts arise mainly upstream at the point of production (tree-felling, paper pulp production, oil refining, etc). Most of the plastic and metal drums used to contain wastes can be re-used several times and many are sold for recycling. Those that are no longer suitable for use are disposed of as general dry waste.

Transportation - (significant impacts: noise, air pollution, fuel usage, greenhouse gas emissions)

The company collects and delivers all its customer batteries by road, and recognises that this has a major impact on the environment through:

exhaust emissions to the atmosphere.

traffic congestion

noise and vibration

leakages of oils and engine coolants at loading areas and car parks, etc

evaporation of unburned hydrocarbons at filling stations

The company has a vehicle fleet, which is maintained to high standards and carefully monitored in terms of its operational performance. All new vehicles have the appropriate Euro engines to enable them to meet European emission control standards.

Most company employees travel to and from the site by private car. This makes a further contribution to atmospheric pollution. There are minor environmental effects arising from the exhaust emissions of the company's diesel-driven forklift trucks. A major environmental effect arises from the company's vehicle exhaust emissions.

CITY BATTERIES LTD

ALBION YARD, MANOR ROAD, ERITH, DA8 2AD

Environmental Management system

Site Management - (significant impacts: various air pollution, water pollution, land contamination, statutory nuisance)

The site was built on a historic industrial site with numerous previous uses and therefore had minimal impact on the local environment at the time of construction. There have been several internal modifications at the site, but they have not altered significantly in external appearance over the years. Technically competent personnel, qualified as competent to manage such operations by the Waste Management Industry Training & Advisory Board, manage the daily operations.

Statutory Nuisance - Noise, Odours, Visual, etc – (significant impacts: various health and environmental)

The levels of dust, fumes, gases, noise, smoke, steam and smell emanating from the operating unit are almost imperceptible and easily comply with the requirements of the EPA (1990) Part III - Statutory Nuisances & Clean Air, and the Clean Air Act 1993. The site is not considered to have any adverse effects on the quality of life of neighbours and nuisance complaints are rare.

Abnormal Conditions ('Worst Case' Scenarios) - (significant impacts: various air pollution, water pollution and land contamination; risks to health & safety)

Fires, especially in warehouses, represent by far the biggest single threat to the local environment. There is potential not only for direct air pollution and land contamination but also for pollution by the release of contaminated fire sprinkler water. The site is on an impermeable surface with a sealed drainage system to contain liquids from spillages etc. This would provide an initial holding capability of approximately 300,000 litres for fire water.

Equipment maintenance/start-ups and shutdowns of plant equipment

Floods – this would result in groundwater run-off but the bunding to the site would also prevent entry of water. In the event that any quantities were able to flow into the site, would then be contained by the bund itself.

Impact of Legislation

This Aspect is to be included when assessing the impact of the site's processes,

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Indirect Environmental Impacts

The Company recognises that its operations have an impact on the environment not only directly and locally during processing at its site, but also indirectly and remotely 'upstream' and 'downstream' of the site.

Indirect impacts are categorised as follows:

Upstream (Supply Side)

raw materials sources and supplies, particularly the packaging.
Energy production, particularly the generation and distribution of electricity and oil
water sources and supplies

Downstream (Distribution, Use and Disposal Side)

transport of containers to and collection of batteries from customer sites
product usage, both normal prescribed use and abnormal use,
misuse or abuse
final product disposal
packaging waste disposal

The Company takes all reasonable steps to impress on its suppliers and sub-contractors the need for environmental awareness and the avoidance of environmentally damaging sources, materials and processes.

ENVIRONMENTAL RISK ASSESSMENT

OBJECTIVES

To provide a robust and reproducible method for establishing the significance of each of the company's environmental impacts.

To provide a basis for managing all significant environmental aspects of the company's business by lowering risks and mitigating environmental impacts.
To provide a means for quantifying improvements in environmental performance.

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RESPONSIBILITIES

Line management has overall responsibility for carrying out risk assessments on site.

The site manager is responsible for ensuring that all environmental risk assessment data are incorporated into the company's Register of Environmental Aspects.

PROCEDURE

The following risk assessment techniques are used, or are under development by the company:

health and safety risk assessment (quantitative points ranking method);
environmental risk assessment (subjective method);

Health & Safety Risk Assessment

In its health & safety system, the company uses a risk assessment method based on ranking hazards by risk. Hazards are rated according to their perceived severity and likelihood of occurrence, each of which factors is ranked on a scale of 1-10. The overall risk is obtained from a simple formula:

$\text{Risk} = \text{severity} \times \text{likelihood of occurrence}$

According to this method, therefore, the magnitude of the risk varies from 1 (trivial) to 100 (potentially catastrophic), and the actual figure obtained indicates which hazards require priority treatment by managers on a 'worst first' basis.

The method, which is long established in health & safety management, is described in GRA (1)

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Environmental Risk Assessment

The company has adopted the following criteria for deciding whether an environmental impact is significant or not:

- it is controlled by legislation or established codes of practice.
- it has financial implications possibly leading to financial or legal liability.
- it has a potential for environmental harm which is recognised in the company's emergency procedures and contingency plans.
- it is known to be of concern to customers.
- it is known to be of concern to bankers, shareholders and insurers.
- it is known to be of concern to the local community or is a cause for complaint.

An Environmental Risk Priority Number (ERP) is then defined as:

$$\text{ERP} = \text{Severity} \times \text{Likelihood of Occurrence} \times \text{Detection}$$

Thus the ERP ranges from 1 (no impact) to 1000 (impact with the greatest possible environmental risks and liabilities for the company). Each member of the ISO 14001 Steering Group independently carries out FMEA calculations on all identified environmental impacts according to the method described.

The entire Register of Environmental Aspects, including all ERP values, is regularly reviewed and amended as necessary by the Environmental Steering Committee.

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ENVIRONMENTAL ASPECTS AND IMPACTS ASSESSMENT

Risk Assessment No.:

Assessor's Name(s):

Facility: Erith Date:

Section	Aspect	Direct or Indirect	Severity Rating	Probability of Occurrence	Failure to Detect	E.R.P.N.	Comments and Actions
1	Emissions to Atmosphere	Direct	5	1	4	20	No WEEE containing CFC's, HCFC's, HFC's & HC's are to be treated on site. Only fugitive emissions from solvent handling.
2	Effluent Discharge	Direct	0	0	0	0	There is no site effluent discharge
2	Site Drainage (SW)	Direct	6	1	1	6	There are no SW drains inside the building where all activities take place. See Schedule 1 for the drainage layout.
3	Solid Dry Waste	Direct	5	5	2	50	Recycling & re-use performance is part of an ongoing improvement program. but some wastes will need to be landfilled
4	Energy Consumption	Direct	3	1	2	6	
5	Water Consumption	Direct	1	1	2	2	
6	Materials Handling and Storage	Direct	6	2	2	4	Fully contained storage and loading/unloading area for vehicles. Fit for purpose.
7	Packaging Materials	Direct	1	1	1	1	
8	Transportation	Direct	6	3	2	36	Loading & offloading wastes only to be undertaken within designated areas.
9	Site Management	Direct	3	3	4	36	Technically competent management in line with Environmental Permit conditions. Full employee induction and training program in place.
10	Statutory Nuisance (noise, odour, etc)	Direct	3	2	2	12	All activities, other than transport, are carried out within the building
11	Abnormal Conds. (worst case scenario, FIRE)	Direct	10	3	2	50	Firewater run off to bunds within the building, external containment in the wash bay, and sites the stage interceptor sealed drainage system
11	Abnormal Conditions. (worst case scenario, FLOOD)	Direct	10	1	1	10	All activities are undertaken within the building. No pathway – no flooding or extreme flooding from rivers or sea without defenses both on-site and within 250m of the site.
12	Impact of Legislation	Direct	10	2	2	40	Adherence is checked during internal audits.
13	Waste Disposal	Indirect	5	2	2	20	Only appropriately licensed recovery and disposal sites are used.

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Appendix 2

Incident and Emergency Procedure

This is a generic procedure for all drivers visiting and would be trained for any incident or emergency happening whilst on site.

INCIDENT AND EMERGENCY PROCEDURES

DATE: 2018

ISSUE DATE: 2018

TO BE REVIEWED DATE: 2 020

THIS IS TO FORM PART OF THE MANAGEMENT SYSTEMS OF THE SITE.

IMPORTANT

This section is divided into 7 parts. Part 3 explains what actions to take in the event of an accident. All employees should read Parts 1 and 2 and familiarise themselves with emergency procedures in the areas within which they work. This is a generic procedure so that all drivers visiting would be trained in the event of any incident or emergency happening whilst on site.

Part 1	Definitions
Part 2	Resources
Part 3	Action during Incident
Part 4	Assembly Points and Site Plan
Part 5	Telephone Numbers
Part 6	Incident and Emergency Procedures for Contractors
Part 7	Incident and Emergency Procedures for Drivers

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PART 1: DEFINITIONS

1.1 The INCIDENTS most likely to arise at the Basingstoke Site

Release of substances

Fire

Collisions from vehicles

Incidents outside the site affect the site, such as floods.

1.2 An INCIDENT is a situation that involves one or more of the following:

Fire or threat of fire of any size or damage to a part of the plant or site or injury to people.

Release of material that could make a section of the site unworkable or which may affect people's health immediately or later.

The mobilisation of incident teams, first aiders, fire or the emergency service.

1.3 An EMERGENCY is a situation which involves one or more of the following:

The possibility of multiple casualties which may require hospital treatment.

Damage or loss on more than one part of the site.

Release of material likely to render untenable a significant proportion of the site.

Release of material likely to cause significant effects on the areas surrounding the site.

1.4 A DISASTER is a situation where the emergency resources of the Company are deemed to be inadequate and outside assistance is required.

1.5 The INCIDENT ZONE is that part of the site likely to be affected by events and will be defined by the Incident and Emergency Controller after consideration of:

Nature of the work/process involved

The nature of the incident

The proximity and character of other planned buildings

Physical factors, especially wind force and direction

1.6 The INCIDENT PROCEDURE can be summarised as follows:

Attendance to the incident by personnel in the working areas

Attendance by the Incident Controller, the site manager, or his supervisor

Action limited to minor firefighting or to control of emissions or spillages at the source

First aid treatment

Preparation of an incident report and review of procedures and working practices in the light of the incident.

1.7 The EMERGENCY PROCEDURE can be summarised as follows:

Attendance to the incident by personnel in the working area

Escalation of the incident to an emergency because of fire or be decision of the Incident Controller

Establishment of the emergency control centre and callout of the emergency services

Works or office evacuation or both and call out public services.

Preparation of reports. Inquiries into causes and methods of future prevention. Revision of procedures.

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PART 2: RESOURCES

The EMERGENCY CONTROL CENTRE is established in the main office and holds the telephone points for the call out of emergency services if required and will have an emergency pack. In the case of fire, the Emergency Control Centre will be established at the external "Fire Assembly Point", mobile phones will be used to call out emergency services, and the emergency kit removed on exiting the building, The emergency pack will comprise of:-

a. Copies of EMERGENCY PROCEDURE for the site (Held inside the pedestrian door within the building)

Site Plan, showing storage area of absorbent for spillage retention and fire extinguisher points.

Current list of all employees for this site.

2.1 The INCIDENT TEAM shall be as follows (see below for names)

The Site Manager	–	Lewis Howes
First Aider(s)	-	Kerry Butterworth Lewis Howes
Area Supervisor	–	Lewis Howes

ASSEMBLY POINT

This has been designated as the area marked on the site plan held within the incident and emergency pack. Supervisors must be responsible for checking all the employees assembled at this point.

EMERGENCY EQUIPMENT

EXTINGUISHERS – Suitable types are distributed throughout the site and employees should familiarise themselves with their position and use. See the site plan held in the incident and emergency pack.

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PART 3: ACTION DURING AN INCIDENT

ON RELEASE OF A SUBSTANCE

Assess the situation carefully.

Do we know what has been spilled?

Is it Non-Hazardous, Hazardous, or unknown/unidentified material? The collection notes or site instructions should provide good information on the material and the hazards associated with it.

Can we deal with it – do we have the correct PPE, spillage absorbent, drain covers etc?

Who needs to be informed? In the first instance, this should be your line manager the site manager or both

If we cannot cope with the incident because of the size or hazards involved do we need to consider evacuating other people from the area?

3.1.1 Do we know what has been spilled?

Is it Non-Hazardous?

For a Large Spillage

Can we stop the flow or leak by closing valves, taps, etc?

Decide which absorbent is needed. Use sawdust for oily wastes, photographic and dry cleaning residues, and "Spillsorb" type granules for other spillages

Seal off access to water courses such as drains and gullies by use of drain covers or absorbents.

For a Small spillage

Cover the area with absorbent and prevent anyone from entering the area of the spill. Use sawdust and "Spillsorb" type granules for the spillage.

In both cases notify the site manager, your line manager, or the responsible person on the site. Following the guidance given, begin to clean up the spill.

Is it Hazardous?

In all incidents involving Hazardous materials

Check the information on the documents you have been given for the hazards associated with the material.

Check the information on the documents you have been given for the PPE needed to deal with the material and put this on. Do not approach or allow anyone else to approach the area of the spill without the required PPE.

- If the material is, or is thought to be, flammable and if it is safe to do so switch off all electrical appliances and power supplies
- Seal off access to water courses such as drains and gullies by use of drain cover absorbents.
- If possible and the hazards associated with the material do not present a risk of harm or injury, stop the flow or leak by closing any open valves, taps, etc.
- Notify the site manager, your line manager, or the responsible person on the site

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- Follow carefully any guidance from the site or your line manager or their technical advisors.
- Following the guidance given, begin to clean up the spill if you can use the spill kit on the vehicle.

3.1.2 **If you are unable to identify the material**

- Assess the nature of the spillage. Look for any indications of hazards such as chemical reactions, gas or vapour production, odours.
- Notify the site manager, your line manager, or the responsible person on the site
- Follow carefully any guidance from the line manager or their technical advisors.
- Prevent anyone else from entering the area of the spillage.

3.2 ON DISCOVERY OF A FIRE

3.2.1 DURING NORMAL WORKING HOURS

CALL for immediate assistance and if you are trained and confident that the blaze can be tackled, attack the fire with the correct extinguishers without taking any personal risk
If the fire is not controllable with extinguishers inform the Site Manager or Site Supervisor who will assess if external emergency services are required.
If possible SWITCH OFF ELECTRICAL POWER to any equipment in that area
If external emergency services have been called follow the EVACUATION PROCEDURE (Section 3.2.3)

3.2.2 OUTSIDE NORMAL WORKING HOURS

In the event of a fire contact Emergency Services
In the event of a release of a substance phone Key Personnel i.e. Site Manager, Supervisor or key Emergency contact as listed in Part 5

EMERGENCY EVACUATION

On the instruction of the Site Manager / Site Supervisor, evacuation will proceed as follows:
Except for people engaged in the Incident or Emergency, all personnel will evacuate their work area and proceed in an orderly manner to the designated Assembly Point.
No attempt must be made to collect personnel belongings or remove cars from the site unless directed to do so by the Site Manager, Fire Officer, or Police
Drivers of City vehicles on the site roads must leave their keys in the ignition in case the vehicle requires moving after evacuation.
The site Supervisor will hold a roll call and any discrepancies reported to the Site Manager or Emergency Services
Employees will not leave their Assembly Points unless told to do so by the Site Manager or Emergency Services
The work areas will be re-occupied on the instructions of the Site Manager or Emergency Services

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RESPONSIBILITIES OF THE SITE MANAGER

When notified of the Incident/Emergency and its location, proceed immediately to the scene.

Assess the scale of the Incident, define the Incident Zone, and decide if an emergency exists or is likely. On his/her decision he/she will activate the Emergency Procedures

Direct all operations within the Incident Zone with the following priorities:

Secure the safety of the personnel.

Minimise the damage to plant, property, and the environment.

Minimise the loss of material.

Direct all operations within the Incident Zone

Direct Rescue and Incident Control Operations until the arrival of the Emergency Service

Ensure the Incident Zone is searched for casualties.

Ensure nonessential workers are evacuated from the Incident Area

Establish communications by messenger with the Emergency Control Centre

Pending the arrival of the Emergency Services, direct the shutting down and evacuation of the plant and areas threatened by the Emergency.

In the absence of the site manager, the site supervisor will act as the site manager.

RESPONSIBILITIES OF FIRST AIDERS

The First Aider(s) will proceed to treat and/or assess any injuries and arrange through the Site Manager if hospital treatment is necessary. He/she will also be responsible for recording the names and nature of the injuries of any casualties.

RESPONSIBILITIES OF THE CHEMICAL ADVISOR

The Chemical Advisor will work with the Emergency Services to:

Identify chemicals in the incident zone.

Identify potential hazards.

Advise on safe practice in the incident zone.

Make recommendations on neutralising any hazardous substance.

PUBLIC SERVICES

FIRE SERVICE – The Senior Fire Officer present has total authority. His main aim will be to contain the emergency as rapidly as possible to protect life. In practice, the Fire Service will certainly make full use of any advice and assistance available on site and will certainly make full use of any advice and assistance available on-site and will share our interest in reducing the overall consequences of the emergency. The Fire Service will be called to any incident involving FIRE or an EMISSION where the source cannot be isolated to prevent escalation of the incident.

POLICE – The Police have over-riding authority where the public is threatened where life is lost or where investigation may be necessary. Personnel will be requested to give whatever assistance they can. In other matters (e.g. site security,) the site administrations will liaise with the Police.

ENVIRONMENTAL CONTROL – The Depot Manager/Duty Technician will involve the Health & Safety Authority, Waste Regulation Authority, and Local Environmental Health Officers as appropriate. The Local Environmental Health office must be informed whenever an emission occurs affecting the general public.

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LOCAL RESIDENTS AND MEMBERS OF THE PUBLIC

DO NOT allow them to access the site under any circumstances. Treat them with respect at all times and inform them that statements will be issued in due course. If it is a member of the public that has raised the alarm, take the name, address, and contact telephone number and assure them that the Company will contact them as soon as possible.

INCIDENT REPORTS

Apart from any reports required by outside bodies (e.g. HSE) a brief report of all incidents will be submitted to the Health and Safety Manager as soon as reasonably possible after the event.

PART 5 TELEPHONE NUMBERS

<i>Function</i>	<i>Name</i>	<i>Home/Night Tel. No</i>
Director	Julian Howes	
	Dean Howes	07739514482
Transport Manager	Mr Andrew Milner	07880037000
Site Supervisors		
	Gary Penny	07503 982747
First Aid	Kerry Butterworth	07807 034743
	Lewis Howes	07540 492367
Health and Safety Manager		07880037000
Environment Agency		03708 506506
South East Water		0333 0000365
Fire Service		02380 644000
Police		101

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PART 6 INCIDENT AND EMERGENCY PROCEDURES FOR CONTRACTORS

6.1

On arrival at the site, contractors must report to the Site Manager. Contractors working in offices must ensure that the switchboard operator or other responsible person is aware of their presence

Contractors must receive a copy of these procedures on arrival on-site.

Whilst it is the contractor's responsibility to ensure their work methods are safe, the Company has the power and legal obligation to ensure that ANYONE working on the Company's premises does so in compliance with the law and safe practices. You must therefore observe any reasonable instructions given by a company employee about safety.

No hot work or confined space work may commence without a signed Work Permit which is obtained from the Site Manager.

Contractors and their employees must familiarise themselves with the location of the nearest fire fighting equipment to their work.

The following section lays down the procedure in case of an emergency.

ON DISCOVERY OF A FIRE DURING WORKING HOURS

Shout for immediate assistance and if possible attack the fire with the fire extinguisher without taking any personal risks.

If the fire is controllable, inform a Site Manager.

If possible, switch off electrical power to anything affected or threatened by the fire.

If the alarm has been sounded, follow the evacuation procedure.

ON RELEASE OF A SUBSTANCE DURING WORKING HOURS

Report the details to the nearest company employee

Take all possible action to prevent further spillage or emission and contain the release without taking any personal risk.

The Site Manager person will decide whether or not to activate the alarm and evacuation will proceed

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PART 7 INCIDENT AND EMERGENCY PROCEDURES FOR DRIVERS

7.1

The site is open for deliveries between 0600hrs and 0000hrs. Deliveries after normal hours must be notified beforehand to ensure offloading personnel are available.

Drivers must receive a copy of this procedure

Whilst it is the drivers' responsibility to ensure their work methods are safe, the company has the power and legal obligation to ensure that ANYONE working on the Company's premises does so in compliance with the law and safe practices. You must therefore observe any reasonable instructions given by the Company employee about safety.

On arrival on site, all vehicles must report to the Supervisor to receive instructions. They will need to be directed to the loading/unloading points where they must report to the Site Manager

Drivers must familiarise themselves with the location of the nearest firefighting equipment to their work.

The following sections lay down the procedure in case of an Emergency:

ON DISCOVERY OF A FIRE DURING WORKING HOURS

Shout for immediate assistance and if possible attack the fire with the fire extinguisher without taking any personal risks.

If the fire is controllable, inform a Site Manager

If possible, switch off electrical power to anything affected or threatened by the fire

If the alarm has been sounded, follow the evacuation procedure

ON RELEASE OF A SUBSTANCE DURING WORKING HOURS

Report the details to the nearest company employee

Take all responsible action to prevent further spillage or emission and contain the release without taking any personal risk

The Site Manager person will decide whether or not to activate the Emergency Procedure.

If the incident justifies Emergency Evacuation, the Site Manager will activate the alarm and evacuation will proceed.

If evacuation is necessary then keys must be left in the ignition of all vehicles.

SCHEDULE 4 -

Interpretation

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“accident” means an accident that may result in Pollution

“authorised officer” means any person authorised by the Agency under section 108(1) of The Environment Act 1995 to exercise, under the terms of the authorisation, any power specified in section 108(4) of that act.

“emissions to land” includes emissions to groundwater

“fugitive emissions” means an emission to air, water, or land from activities that are not controlled by an emission limit

“groundwater” means all water, that is below the surface of the ground in the saturation zone and direct contact with the soil or subsoil.

“notify/notified without delay” means that a telephone call can be used, whereas all other reports and notifications must be supplied in writing, either electronically or on paper

“pollution” includes pollution of the environment, harm to human health and serious detriment to the amenities of the locality resulting from the licensed activity

“quarter” means a calendar year quarter commencing on 1st day of January, April, July or October

“Relevant person” and *“relevant offence”* shall have the same meaning given to them in the Environment Act 1990

“sewer” means sewer within the meaning of section 219(1) of the Water Industry Act 1991

“technically competent management” and *“technical competence”* shall be as prescribed under section 74 of the Environmental Protection Act 1990

“waste code” means the code specified in The List of Wastes (England) Regulations 2005 (SI 2005 No 895) as amended, or the List of Wastes (Wales) Regulations 2005 (SI 2005 No 1820) (W.148) as amended. Codes marked with an * are hazardous waste, as defined in those regulations. Licence conditions apply to those wastes listed with a six-digit code.

“year” means calendar year commencing on 1st January