

Environmental Management System

Prepared on Behalf of:
Scrapco Metal Recycling Ltd

Site Name:
2a Landau Way
Darent Industrial Park
Erith
Kent
DA8 2LF

1.1.1. Environmental Permit:
WML 101450

DOCUMENT CONTROL SHEET

Site:	Erith
Project:	Environmental Compliance Support
Title	Environmental Management System
Issue	1.4
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Distribution List: Environment
Agency

Key Site Information

SITE DETAILS			
Location: 2a Landau Way, Darent Industrial Park		Operator: Scrapco Metal Recycling Ltd	
Postcode: DA8 2 JZ			
SITE CONTACTS	Name	Office Hours (specify)	Out of hours
Manager	Mark Driscoll	01322 342302	01322 342302
EMERGENCY SERVICES		Office Hours	Out of hours
Police, Fire Ambulance:		999	999
REGULATORS		Office Hours	Out of hours
Environment Agency (emergency hotline)		0800 80 70 60	0800 80 70 60

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1 Introduction

N.B.1 This Environmental Management System has been produced in accordance with Environment Agency Guidance ‘Develop a management system: environmental permits’.

Table 1: Develop a Management System & Environmental Management System Cross Reference

Develop a Management System Guidance Contents	Environmental Management System Sections
Site Infrastructure	Section 1.7
Site Operations	Sections 3-13
Site Equipment Maintenance Plan	Section 15
Contingency Plan	Section 16
Accident Prevention & Management Plan	Sections 17-23
Complaints Procedure	Section 20
Climate Change	Appendix EMS7
Managing Staff Competence & Training Records	Sections 1.5 & 14
Keeping Records	Section 13
Review Your Management System	Section 24
Site Closure	Section 16

1.2 Interpretation

1.2.1 ‘Responsible Person’ means any person responsible for monitoring and reporting as detailed in this EMS (Director/Compliance Manager/Technically Competent Manager/Site Management/Supervisor).

1.3 General Management

1.3.1 Activities will be operated and managed in accordance with this site-specific Environmental Management System (EMS) and the governing Environmental Permit, using sufficient competent persons and resources

1.3.2 All employees having duties that are or may be affected by the matters set out in this EMS will have access to a copy of this document and the governing permit. Documentation will be clearly labelled and displayed within the Site Office.

1.4 Implementation and Operation

1.4.1 Sufficient resources essential to the effective implementation and update of this EMS will be put in place and maintained. At least one Responsible Person is present when the site is operational.

1.4.2 Training needs have been identified so that all personnel whose work may contribute towards the safe and compliant operation of the site have received appropriate training.

1.5 Sufficient Competent Management

- 1.5.1 Sufficient competent management will be maintained, and the minimum TCM attendance requirements will be met. Attendance will be recorded in the Site Diary.
- 1.5.2 If the designated TCM is absent for a period such that the minimum agreed attendance is unlikely to be achieved, a suitably qualified alternative will be secured & the Agency notified of any proposed change.

1.6 Checking & Corrective Action

- 1.6.1 A Responsible Person will be responsible for handling and investigating any incidents that may result in non-compliance with this EMS, taking action to mitigate any impacts caused and for initiating and completing corrective and preventive action. Any such action will be used to inform changes in the documented procedures.

1.7 Site Infrastructure

Table 2: Site Infrastructure Provisions

Provisions	Description
Interceptor	Sealed drainage gullies to interceptor.
Building	Buildings used for the depollution of ELVs, processing of non-ferrous metals & storage.
Security fencing & access gate	Perimeter containers/walls with lockable access gate.

1.8 Equipment Inventory

Table 3: Critical Equipment Inventory (Indicative)

Onsite Provisions
Depollution Rig(s)
Forklift(s)
Baler
360 Grab(s)

N.B. Neither a prescriptive nor an exhaustive list.

2 Environmental Legal Register

Table 4: Environmental Legal Register (Not an exhaustive list of requirements)

Legislation	Summary/Obligations	Compliance Documentation Location	Responsibilities
Environmental Permit: WML 101450	Overarching permit that stipulates the conditions by which the site must be operated to.	Copy of permit held within the Site Office. Compliance documentation includes an Environmental Management System.	Reasonable Person
Waste Carriers Licence CBDU 179304	Waste management companies moving wastes must be registered as an 'upper tier' waste carrier.	Copy of registration is held within the Site Office.	Reasonable Person
Scrap Metal Dealers Licence	Authorised Treatment Facilities (ATFs) must be registered as scrap metal dealers.	Copy of licence held within the Site Office.	Reasonable Person
Environmental Permitting Regulations 2016 (As Amended)	Overarching Legislation for waste management facilities (i.e., compliance with permit conditions & the requirements to have a permit as a waste activity).	Copy of permit held within the Site Office.	Reasonable Person
The Waste (England and Wales) Regulations 2011 Waste Hierarchy (As Amended)	Overarching Legislation for the management and handling of waste. Ensure waste is managed as far up the waste hierarchy as possible, evidence should be retained with the Site Office to support any minor deviations.	Compliance with the waste hierarchy is assured by the depollution procedures detailed within this Environmental Management System & all transfer notes included the required declaration.	Reasonable Person
The End-of-Life Vehicles Regulations 2003, 2005 & 2010 See Defra Guidance on depollution requirements for further	Overarching Legislation setting the minimum standard/requirements for ELV ATF operators. Operators of ELV sites must issue a Certificate of Destruction via the DVLA (i.e., through a	Environmental Management System details compliant acceptance, treatment & storage operations, a copy of which is held within the Site Office. Copies of V05 forms &	Reasonable Person

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information.	Registration as an ATF) when a vehicle becomes waste at an ELV ATF facility.	Certificates of Destructions issued are held within the Site Office.	
The End-of-Life Vehicles (Producer Responsibility) Regulations 2010 as amended	Overarching Regulations for producers of vehicles & ATFs. ELV recycling & reuse target of 95% (10% of which can be sent for recovery operations i.e., energy of waste).	Compliance certifications for recycling/reuse/recovery of ELVs are held within the Site Office.	Reasonable Person
The Environmental Protection Act 1990: Copies of all non-hazardous waste Duty of Care waste transfer notes must be kept onsite for 2 years.	Overarching Legislation for waste management activities. Duty of Care requirement for the movement of all waste, (not required for internal movements or movements within the same company). These must be kept for two years.	All Duty of Care waste transfer notes are held in the Site Office for two years.	Reasonable Person
Scrap Metal Dealers Act 2013	Overarching legislation for any person/company involved in the business of buying and selling scrap metals (i.e., ELVs).	Copy of licence held in the Site Office.	Reasonable Person
The Hazardous Waste Regulations 2005: <i>Hazardous Waste Consignment Notes</i> (Recommendation that the EA template for Consignment Notes is used)	Overarching legislation for wastes that are classified as hazardous. Hazardous waste must not be mixed with other hazardous waste or non-hazardous wastes. A Consignment Note must accompany all hazardous waste management; there must be kept onsite for 3 years.	All hazardous Consignment Notes are kept for three years within the Site Office.	Reasonable Person

3 Operations

3.1 Specified Waste Management Operations

3.1.1 Waste management operations are listed in Table 5 & 6.

Table 5: Specified Waste Management Operations

TBC

3.2 Permitted Wastes

- 3.2.1 Primary waste types that will be received onsite are presented in [Table 6](#) below with associated waste codes.

Table 6: Permitted Waste Types

TBC

Table 7: Maximum Permitted Throughput

Waste Category	Annual Tonnage
To not exceed:	75,000 (Permitted)

4 Waste Acceptance Procedures

4.1 General

- 4.1.1 Materials are accepted into the site both from third party deliveries and by way of collections from customers.
- 4.1.2 Materials collected from customer sites-
 - 1. When a collection is scheduled, the prohibited material are clearly stated & reflected in terms of collection.
 - 2. When collecting the materials, the driver will inspect to check as far as practicable for any prohibited material present.
 - 3. If prohibited material is present, the customer will be notified and advised of the following courses of action available: -
 - a) Remove material and leave at the customer's premises.
 - b) Accept material and dispose of directly to a site permitted to accept the waste at the customer's expense.

4.2 Third party deliveries

- 4.2.1 On entering the site, waste-carrying vehicles will initially be weighed and visually inspected (if possible) by the weighbridge operator to ensure that the wastes are as described on the transfer note, are in accordance with the permitted waste types and be in a condition suitable for deposit and processing in the designated area of the site.
- 4.2.2 Operatives are aware of permitted waste types, what the content of the load ought to contain and whether it is suitable for deposit within the material specific Waste Acceptance Area. Any waste that Operatives are unsure of in nature will be left in situ and advice of a member of the site management team will be sought in the first instance. This may result in reverting to the Agency for advice. In the absence of any specific guidance from the Agency, the waste(s) will be isolated and removed from the site as soon as practicable to a suitably permitted site.

4.3 Ferrous Metal Acceptance Procedures

1. Ferrous metal deliveries are directed to deposit their loads within the Ferrous Metal Waste Acceptance Area.
2. Operatives inspect materials during the unloading process & once deposited within the Acceptance Area (ensure all vehicles are depolluted).
3. In the event of non-permitted wastes or unsuitable materials being detected during the inspection the following procedures will be followed:
 - a) If visual inspection of waste prior to tipping identifies unsuitable wastes or items the vehicle will not be allowed to unload.
 - b) If once tipped unsuitable waste or item is identified, the waste/item will be relocated and if necessary isolated within the non-permitted waste isolation facility (a skip/container).
 - c) Any pressurised canisters detected will be isolated, removed and stored within the Pressurised Canister (lockable) Cage.
 - d) If on the inspection of deposited vehicle shells, it becomes apparent that the vehicle has not been fully depolluted (i.e. a component or fluids are still present) the vehicle will be isolated & the Operatives in the Depollution Shed notified to complete the necessary removal of hazardous components.
 - e) Details of all such incidents will be recorded on the Weekly Compliance Inspection Check Sheet. In each case a record of the incident will be noted including time, description and carrier.
(Customers will be contacted & made aware of permitted waste types if any non-permitted waste types are identified or vehicles have not been correctly depolluted).
4. Once the Operative has accepted the materials the delivery vehicle will be directed back to the weighbridge, for weighing and documentation finalisation.
5. Operatives will continue to inspect all materials deposited whilst processing operations are undertaken as necessary (baling/shearing).
6. Processed ferrous metals will be allowed to cool prior to stockpiling within the appropriate bay/container dependent on the grade of material.
7. All materials will be inspected prior to stockpiling to ensure no non-permitted wastes are present. In the event of identification these material will be relocated, (if necessary), isolated and stored within the non-permitted isolation facility (a skip/container).

4.4 Non-Ferrous Metal Waste Acceptance Procedure

1. Non-Ferrous metal deliveries are directed to deposit their loads within the Non-Ferrous Metal Waste Acceptance Area.
2. Operatives will inspect all materials deposited located within the Non-Ferrous Metal Acceptance Area to ensure no non-permitted wastes or unsuitable materials are present.
3. Non-Ferrous Metals are individually weighed by type & grade allowing a detailed examination of all wastes present. (Includes batteries & cables for example).
4. In the event of non-permitted wastes or unsuitable items being detected the following procedures will be followed:
 - a) If visual inspection of waste prior to tipping identifies unsuitable wastes the vehicle will not be allowed to unload.
 - b) If once tipped unsuitable waste is identified, the waste/item will be relocated and if necessary isolated within the non-permitted waste isolation facility (a skip/container).
 - c) Details of all such incidents will be recorded on the Weekly Compliance Inspection Sheet. In each case a record of the incident will be noted including time, description and carrier.
5. Waste materials accepted will be stored in receptacles as specified on the Site Location Plan.
6. Operatives will inspect all materials accepted to ensure no non-permitted wastes or unsuitable materials have been inadvertently accepted or stored. In this eventuality, these materials will be removed and if necessary isolated within the non-permitted waste isolation facility (a skip/container).

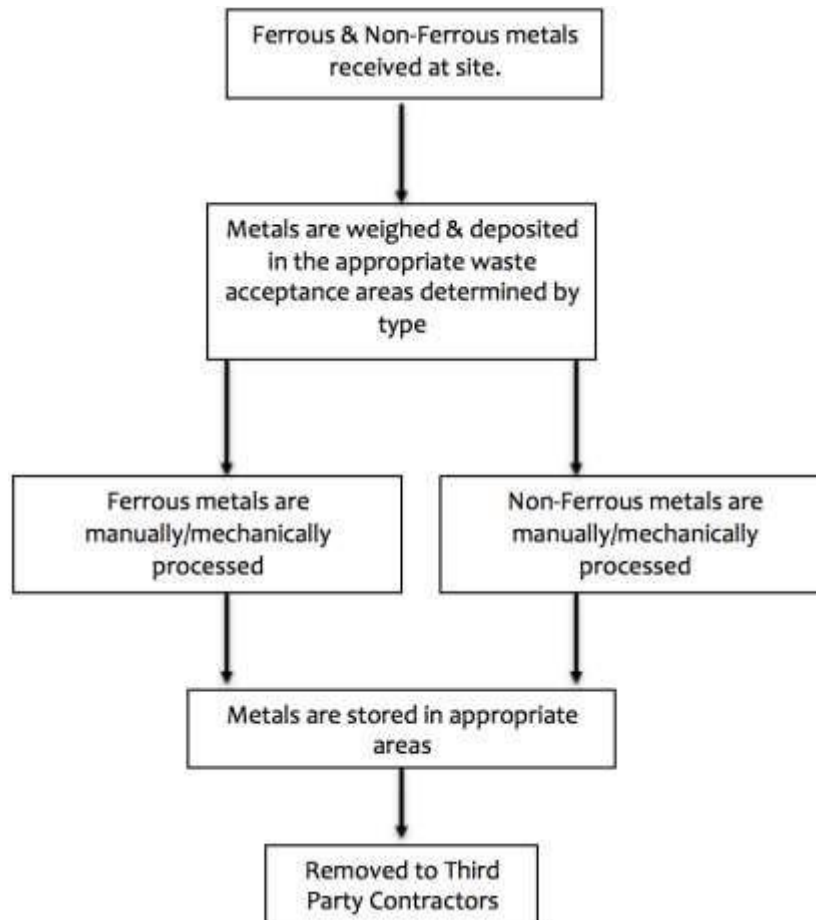
4.5 End of Life Vehicles (ELV's) Waste Acceptance Procedures

4.5.1 ELVs are sourced by purchase at auction, by private purchase or by third party deliveries. ELVs purchased at auction or privately have already undergone inspection.

1. Operatives inspect the interior, glove compartment & the boot to ensure that no non-permitted waste or unsuitable items are present within the ELV.
2. In the event of non-permitted wastes or unsuitable items being detected the following procedures will be followed:
 - a) Materials will be removed and if necessary isolated within the non-permitted waste isolation facility (a skip/container).
 - b) Any pressurised canisters detected will be isolated, removed and stored within the Pressurised Canister (lockable) Cage.
 - c) Any drums identified will be examined to determine contents & if safe isolated within the non-permitted waste isolation facility (a skip/container). A Responsible Person will be notified in the first instance. This may result in reverting to the Agency for advice, if deemed necessary.
3. If asbestos is detected the following procedures will be followed:
 - I. Isolate, if safe to do so while using appropriate PPE.
 - II. Dampen down utilising water provisions to prevent fibres/particulates being released.
 - III. Contact a specialist contractor to isolate/remove asbestos from site immediately.
 - IV. In the event of fibre release, the site will be evacuated until a specialist contractor has dealt with the risk. The Environment Agency and the Environmental Health Officer will be notified immediately.
 - V. Notify Regulatory Authorities when the asbestos has been removed offsite and the site has recommenced operations.
 - VI. Complete a Non-Conformance Record Form and an Accident & Incident Investigation Report.
 - VII. Provide written confirmation of the event and outcome to the Agency within 24 hours.
4. Details of all such incidents will be recorded on the Weekly Compliance Inspection Check Sheet and records of removals are kept within the site office. In each case a record of the incident will be noted including time, description and carrier.

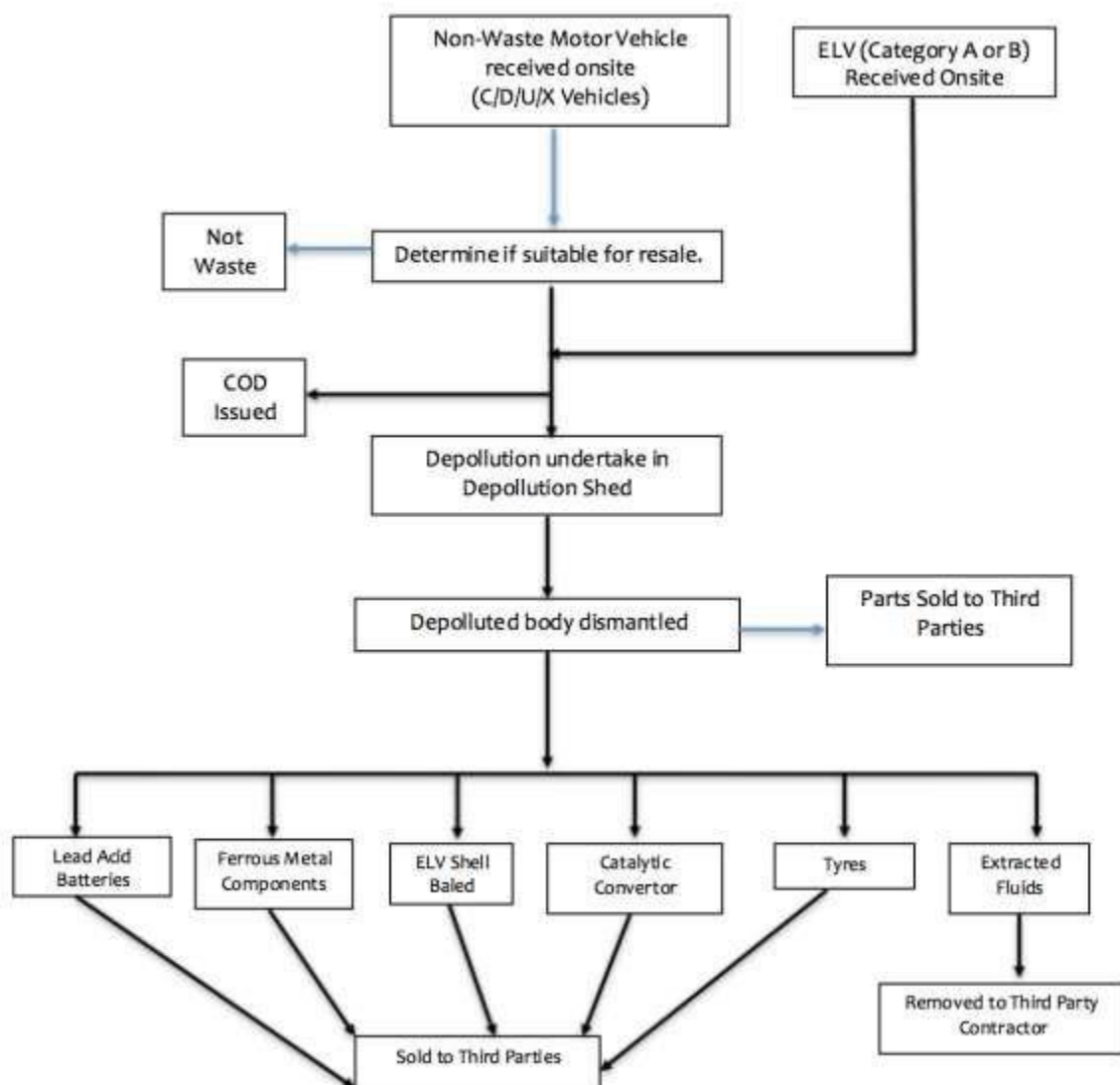
5 Operational Process Flow Diagram (Ferrous & Non-Ferrous Metals)

Figure 1: Operational Flow Diagram (MRS)



6 Operational Process Flow Diagram (End of Life Vehicles)

Figure 2: Operational Flow Diagram (ELV ATF)



7 End of Life Vehicle ATF procedures

7.1.1 Scrapco Metal Recycling Ltd site undertakes depollution activities on vehicles classified as waste following the Defra Guidance although the required task may not necessarily be completed in any given order.

7.1.2 Operations are undertaken using appropriate depollution equipment as follows:

Heaters

1. Set heater controls to maximum so that the air conditioning unit can be drained completely.

Batteries

2. Disconnect & remove batteries (once all depolluting activities requiring the battery have been completed i.e., setting the heater to maximum to drain the air con gases). Store in an acid proof plastic container to prevent the risk of acid leaking if the self-contained battery units fail. If stillages are stored externally (i.e., with no weather proof covering) a lid must be provided to prevent the ingress of water.

Wheel Removal

3. Remove tyres & wheel rims. Tyres is sorted into those in a suitable condition for resale and those not suitable for resale.

Oil Filters

4. Remove & crush oil filters. These will be stored within a container within the Depollution Shed. (If all oil is removed from the filter the residual metal can be scraped).

Fluid extraction

5. Remove fuel sump caps to enable the fluids to be drained more easily.
 - a) Drain engine oil/gear box oil into a dedicated container
 - b) Drain brake & power steering fluid into a dedicated container
 - c) Drain screen wash & coolant into a dedicated container
 - d) Drain fuels (separately) into dedicated containers
6. All containers over 205 litres must benefit from secondary container (i.e., 110% capacity).

Advisory: Hazardous waste fluids should not be mixed & should be collected/stored separately.

Mercury Switches

7. Remove any switches that are marked as containing mercury. If they are not clearly marked, they do not have to be removed.

Advisory: Operatives must take all necessary safety precautions; including leaving the switches in situ, if a significant danger to health is posed.

Catalytic Convertors

8. Remove catalytic convertors & store them in containers on place on the racking pending removal.

Advisory: Catalysts are now classified as hazardous waste (16 06 21*); these wastes should be consigned out of the site via a hazardous waste Consignment Note.

9. Remove catalytic convertors, and store in the designated container in the workshop or externally.

Shock Absorbers

10. Remove shock absorbers suitable for resale & store in appropriate area.
11. Leave shock absorbers not intended for re-sale in situ on the vehicle and drain oil; drained to a dedicated container.

Air Conditioning Gases

12. Remove air conditioner gases via appropriate extraction and storage equipment (ensuring that R12, R134a & HFO-1234yf gases are not mixed).

Advisory: Only qualified operatives will be authorised to recover refrigerant from mobile air conditioning systems, (via a City & Guilds Mobile Air Conditioning Certificate).

Air Bag & Pretension Deployment

13. The deployment of airbags must only be undertaken 20 minutes after the battery has been disconnected. At a safe distance from operative/visitor and away from any material that could shatter or smash (e.g. glass, all car windows are to be down).

Advisory: Battery disconnection & removal should ensure that the airbag systems are deactivated, which should prevent unwanted inflation of units. However, caution is advised, as airbag systems will still be active even if the battery has been removed, depending on the age of the vehicle.

Parts Extraction

14. Parts suitable for resale & reuse are removed & stored within appropriate areas of the site including within the Depollution Shed & within the external yard area.

Advisory: Operatives using cutting equipment (i.e., hot works) should have appropriate training, which can be completed internally & be issued with permits to work.

Residual Shell

15. Residual shells are stored pending compaction & removal.

8 Oversized Ferrous Metal Processing (Hot Works) Procedure

- 8.1.1 Some ferrous metals are reduced in size to enable processing & onward transportation via hot cutting equipment (oxygen & propane), in a designated area of the site.
- 8.1.2 All hot work activities will be undertaken at least 6 metres from any accumulation of materials.
- 8.1.3 Only Competent Persons that have completed training will be authorised to perform 'hot work' activities, which are approved by Senior Management.
- 8.1.4 If necessary two operatives will complete 'hot work' activities, which will allow one person to complete necessary works & the other to supervise and tackle any sparks generated (this may include a member of the site office watching via CCTV).
- 8.1.5 Fire extinguishers will be kept at hand all times 'hot works' are undertaken.

9 Storage Management

- 9.1.1 All waste management operations are conducted on an impermeable surface with sealed drainage.
- 9.1.2 All fluids extracted from waste motor vehicles are stored in dedicated containers, which provide secondary containment (110% capacity were appropriate).
- 9.1.3 Fluid storage containers are stored, managed & removed using the correct procedures to ensure the health & safety of all site operatives & overarching legal compliance.
- 9.1.4 Absorbents will be deployed to control any spillages & leakages arising from the handling of waste motor vehicles. In the event of a spillage/leakage enact the procedure detailed within this document. Absorbents may include spillage kits, sawdust &/or sands, in the event of deployment a container will be provided to store these hazardous materials (this may include storing these granules alongside oil filters), which will be collected by an authorised waste management company.

- 9.1.5 If any vehicles arrive onsite leaking any residual fluids, then absorbents will be deployed immediately, or a collection tray will be deployed to contain all fluids & these vehicles should be depolluted first.
- 9.1.6 Waste batteries will be stored in acid resistance boxes and will be provided with a lid to prevent water ingress if stored outside, which are stored based on battery type.
- 9.1.7 Batteries that are damaged should be stored separately from batteries that are not damaged even though they will be transported in the same vehicle for onward management.
- 9.1.8 WEEE Cables will be stored with a weatherproof covering, whilst Electrical & Telecommunication cables are stored on an impermeable surface with sealed drainage.
- 9.1.9 Hazardous WEEE wastes are stored and provided with a weatherproof covering, whilst non-hazardous WEEE Wastes are stored in bays and processed through the press and shear.

10 Parts for Sale

- 10.1.1 Parts may be left in situ & removed as requested by members of the general public. Members of the general public will not be allowed within the operational area.
- 10.1.2 Engines will be assessed as suitable for re-use prior to depollution with the engine removal & stored accordingly. Necessary information will be recorded and retained, which may include the marque of a vehicle, engine size (cc), fuel, and engine number. As part of the depollution process engines will be drained & bunged prior to sale, which will ensure that only the minimum amount of oil is retained to prevent any corrosion.
- 10.1.3 Parts intended for reuse will be assessed to ensure that they are suitable for re-use without modification or repair.
- 10.1.4 Tyres will be assessed as to their suitability for re-use, considering the tread wear, any foreign objects, or any noticeable damage to the sidewalls as per part-worn tyre requirements. All tyres not road legal in the UK will be regarded as waste.

11 Despatch Procedure

- 1. Wastes stored within bays/containers/areas will be placed within the despatch vehicle using mechanical equipment.
- 2. Containers will be loaded directly onto the collection vehicle.
- 3. Once loaded, vehicles move to the weighbridge, the weight is recorded and the vehicle sheeted for despatch.
- 4. All drivers will inspect their loads prior to leaving the site to prevent spillages of waste or debris on the entrance and exit roads of the site.

12 End of Day Site Close Down Procedures

12.1.1 A Responsible Person will ensure that:

1. All equipment is switched off.
2. All mobile plant is at a minimum distance from any risk areas including any accumulations of combustible materials
3. That all plant and equipment is switched off.
4. No visible signs of flames, smoke or embers onsite.
5. All non-essential equipment & lighting is switched off within the site
6. No one remains onsite during non-operational hours.

13 Duty of Care

13.1.1 All waste received by and leaving the site will be accompanied by waste transfer notes recording the quantity and type of waste removed and the authorised status of the destination.

13.1.2 Scrapco Metal Recycling Ltd take its responsibilities seriously under Duty of Care & understands them to require it to:

1. Check the authorised status of all waste carriers utilised;
2. Wastes are going to a suitably authorised facility;
3. Complete compliance status checks from time to time;
4. Produce & maintain appropriate records relating to wastes received and removed.

13.2 Notification

13.2.1 Notify the Environment Agency without delay in the event of detecting any of the following:

1. Any malfunction, breakdown or failure of equipment or techniques, accident or emission of a substance not controlled by an emissions limit which has caused, is causing or may cause significant pollution;
2. The breach of a limit specified in the permit;
3. Any significant adverse environmental effects.

13.2.2 The Environment Agency will be notified without delay with written confirmation (i.e. an email & telephone conversation with the local Enforcement Officer) of such incidents, which must be submitted within 24 hours.

13.2.3 The Environment Agency will be notified within 14 days of the occurrence of the following matters except where such disclosure is prohibited by Stock Exchange Rules.

Where the operator is a registered company:

- Any change in the operator's trading name, registered name or registered office address; and
- Any steps taken with a view to the operator going into administration, entering a company voluntary arrangement or being wound up.

13.3 Avoidance, recovery and disposal of wastes produced by the activities

13.3.1 The requirements laid down by The Waste Regulations 2011 will be complied with as far as possible and in particular: -

- a) Waste managed by the activities; and
- b) All waste generated by operations conducted onsite will be dealt with in accordance with the waste hierarchy; and
- c) If disposal is necessary, a manner will be selected which reduces the potential impact on the environment

13.3.2 All wastes generated will be quantified & characterised using appropriate competence.

13.3.3 Any hierarchy deviations will be justified and recorded.

13.3.4 Every three years a Company Director will review all arrangements & practices around the management of wastes. Steps identified by such a review will be implemented as necessary & deemed appropriate to operational compliance.

13.4 Site Security

13.4.1 Site security arrangements include concrete walls & storage containers with a lockable access gate.

13.4.2 CCTV cameras are in operation 24-hours a day.

13.4.3 Outside operational hours the site access gates are shut and securely locked.

13.4.4 Security arrangements (concrete walls/containers & access gate) are inspected on a weekly basis. Any necessary repairs are recorded & will be completed as soon as possible to maintain the sites perimeter, which may result in interim repairs until an external contractor can attend site.

14 Training

- 14.1.1 New employees' will receive an induction upon commencement of employment, which will involve a Responsible Person completing a training needs assessment to ensure all new employees have the required training to complete their day-to-day tasks correctly & safely.
- 14.1.2 Training is tailored depending on an employee's specific needs/ role within the Company; these needs are presented within the [Table 10](#) below.
- 14.1.3 Training records are held within the Office.
- 14.1.4 Employees receive refreshers trainings on all internally provided training as required.
- 14.1.5 External companies provide specialist training to onsite employees as and when it is required with appropriate refreshers as determined by the external trainers.

Table 10: Training Matrix (Recommendations)

Training Requirements		Responsible Persons	Operatives	External Contractors
Internal Training ('Tool Box Talks')	Permit Requirements			
	Exemption Requirements			
	Environmental Management System Procedures			
	Fire Safety Briefing			
Externally Completed Training	Mechanical Equipment			
	Depollution Equipment			
	F Gas Certificate			
	Air Bag Deployment			
	First Aider			
	Fire Marshall			
	Fire Awareness			

Key	
Required	
Not Required	

15 Maintenance

15.1 Daily Checks

- 15.1.1 Operatives will inspect all mechanical equipment daily prior to the commencement of operations.
- 15.1.2 Defects are raised with a Response Person & recorded as appropriate.
- 15.1.3 If repairs cannot be completed onsite an appropriate external contractor (dependent on the type of malfunction) will be contacted to affect a repair.

15.2 Weekly Checks

- 15.2.1 A Responsible Person will undertake a thorough inspection of all critical site infrastructure & equipment on a weekly basis.
- 15.2.2 Repairs will be recorded on the Weekly Compliance Inspection Check Sheet where appropriate. If a repair cannot be completed onsite then the faulty item will be isolated and arrangements made for repairs to be affected as soon as practicable.

15.3 Annual Checks

- 15.3.1 Mechanical equipment will have inspections completed on a yearly basis & all equipment will undergo the manufacturers or suppliers' recommended frequency for servicing.
- 15.3.2 Routine mechanical maintenance is scheduled against the records kept in the Office. These records determine the frequency by which inspections take place.
- 15.3.3 All records will be kept in the Office.

15.4 Maintenance Checklist

Table 11: Maintenance Checklist

Maintenance	Frequency					Location of Instructions
	Day	Week	Month	Year	5 years	
Internal						
Clean up spills on surfaced areas.	O					Office
Inspect integrity of site security perimeter		R				Office
Inspect integrity & state of site surfaces/access road		R				Office
Clean site surfaces to prevent 'track-out'.	O					Office
Inspect storage areas	O	R				Office
Inspect electrical equipment		R				Office
Inspect firefighting equipment		R				Office
Inspect integrity of drainage channels		R				Office
Inspect integrity of interceptor			R			Office
External						
Operational Fleet (Servicing/MOT)				E		Office
Excavator (LOLER)				E		Office
Fire extinguishers				E		Office
PAT testing				E		Office
Electrical Wiring					E	Office

Key	
Responsible Person	R
Operative	O
External Contractor	E

16 Contingency Planning

Table 12: Contingency Measures

Eventuality	Procedures/Measures
Accident	<u>Measures may include:-</u> 1. The affected area will be isolated and an appointed 'first aider' will be contacted to attend to any injured party. 2. If necessary, the emergency services will be contacted. 3. A Responsible Person will decide on a case-by-case basis if cessation of operations around the affected area is necessary until the appropriate emergency services have arrived. 4. A Responsible Person will complete an Accident Investigation Report.
Supply Chain Failure (Including Transportation Shortages)	<u>Measures could include:-</u> 1. Confirm current storage times for materials accumulated onsite. 2. Increase monitoring of material stockpiles onsite. 3. Contact outlets for the specified stream and arrange transportation. 4. If the outlet is not receiving the specified waste stream contact other outlets. 5. Conduct investigations into potential alternative outlets, if potential outlets are not accepting specified streams.
Breakdowns (Mechanical Equipment)	<u>Measures could include:-</u> 1. Immediate isolation of the affected machinery 2. Deploy absorbents/sand bags if required. 3. External contractors notified to complete repairs 4. Hire in relief equipment in interim if needed. 5. Reschedule material despatch to align with scheduled repairs and or relief machinery availability.
Site Closure	<u>Measures could include:-</u> 1. Appropriate signage will be erected notifying any visitors that operations have been suspended. 2. Advise customers of the situation. 3. No more wastes will be accepted on to site. 4. Contact all potential outlets to ensure that all waste material is managed in accordance with the waste hierarchy where possible. 5. Notify EA that customers & receiving outlets have been contacted and provide scheduled dates for material removal. 6. Notify EA once stockpiles have been reduced to acceptable level

17 Emissions Management

- 17.1.1 Condition 3.1 relates to the control of emissions of substances not controlled by emission limits as follows: -

3.1.1 Emissions of substance not controlled by emissions limits (excluding odour) shall not cause pollution. The operator shall not be taken to have breached this rule if appropriate measures, including, but not limited to, those specified in any approved emissions management plan, have been taken to prevent or where that is not practicable, to minimise, those emissions.

3.1.3 All liquids in containers, whose emissions to water or land could cause pollution, shall be provided with secondary containment, unless the operator has used other appropriate measures to prevent or where that is not practicable, to minimise, leakage and spillage from the primary container

- 17.1.2 This section of the site EMS addresses any potential emissions that may arise from site operations. It demonstrates the measures taken to prevent or minimise the release of emissions such that they do not cause pollution as required by Condition 3.1:

“Pollution” means emissions as a result of human activity, which may: -

- (a) Be harmful to human health or the quality of the environment,*
- (b) Cause offence to a human sense,*
- (c) Result in damage to material property, or*
- (d) Impair or interfere with amenities and other legitimate use of the environment.*

17.2 Monitoring

- 17.2.1 Employees will remain mindful of the potential impact the operation could have on the local environment and take all reasonable steps to avoid giving rise to pollution or a nuisance as a consequence of the site operations.
- 17.2.2 In the event of ongoing issues or concerns being identified these will be investigated and appropriate actions implemented. This may include the formulation of management plans.
- 17.2.3 In the event of an emissions release that has caused, is causing or may cause significant pollution, the Environment Agency will be notified within 24 hours, advice taken and action recorded.

17.3 Dust Emissions

- 17.3.1 It is not expected that dust generation/release will present any significant problems due to the nature of the wastes dealt with onsite.

17.4 Dust Monitoring

- 17.4.1 Operatives & Responsible Persons will monitor conditions on an ongoing basis throughout the working day. Observations will be recorded in the Site Diary.

17.5 Odour Emissions

- 17.5.1 It is not expected that odour generation/release will present any significant problems due to the non-putrescible nature of wastes dealt with onsite.

17.6 Odour Monitoring

- 17.6.1 Responsible Persons will monitor odour levels on an ongoing basis throughout the working day. Observations will be recorded in the Site Diary.

17.7 Noise & Vibration Emissions

- 17.7.1 The overall noise emissions amenity impact is low, due to the isolated nature of the operation & onsite controls/procedures.
- 17.7.2 Noise generated on the site would be principally associated with the operation of mechanically equipment.
- 17.7.3 Appropriate silencing equipment is fitted to all plant/machinery where appropriate and all equipment is operated in accordance with the manufacturer's recommendations.
- 17.7.4 Maintenance inspections are carried out on all equipment and machinery. Any malfunctions or defects are therefore identified at the earliest opportunity.

17.8 Noise & Vibration Monitoring

- 17.8.1 Responsible Persons will monitor noise levels on an ongoing basis throughout the working day. Observations will be recorded in the Site Diary.

17.9 Scavenging Birds

- 17.9.1 It is not expected that scavenging birds will present any significant problems as the site will not be accepting any putrescible or food wastes.
- 17.9.2 Responsible Persons will monitor conditions on an ongoing basis throughout the working day. Observations will be recorded in the Site Diary.

17.10 Pests

- 17.10.1 The risk of infestation of pests and vermin is minimised by maintaining general good housekeeping and ensuring that the site is clean and tidy.
- 17.10.2 Responsible Persons will monitor site conditions of any signs of pest infestation.
- 17.10.3 If flies, or other such problematic insects are introduced to the site with incoming waste, insecticides offering rapid and long-term treatment will be utilised and the offending waste promptly removed from site.

17.11 Litter

- 17.11.1 Any escape of litter will be controlled throughout the working day & cleared immediately on identification.
- 17.11.2 Operatives complete a final inspection around the site perimeter at the end of the working day and removal of any fugitive material/debris, access road and operational areas at the end of the working day.

18 Incident Response Procedures & Instructions

19 Emergency Procedures

19.1.1 The following procedure applies to **All Emergencies**:

1. A Responsible Person will take immediate control of any incident pending handover to the appropriate authority (if currently onsite).
2. Gather as much information as possible, including names & addresses of any bystanders & take photos as evidence if possible.
3. Appropriate personal protective equipment is to be used at all times (PPE is located within the Company Office).
4. Complete an Environmental Incident Record form as shown in Appendix EMS1.

19.2 Environmental Incident Record Form Procedure

1. Complete Environmental Incident Record Form as detailed within Appendix EMS1 in the event of any accident/incident with potential environmental implications.
2. Pass completed form to a member of the Compliance Team for investigation.
3. Once investigations are complete any corrective action recommended.
4. A copy of any completed forms is held within the Office once actioned for at least three years.

20 Complaints

- 20.1.1 In order that any complaints can be substantiated it is imperative that the site is immediately informed either by the complainant themselves or by the Environment Agency or Local Authority.
- 20.1.2 The site telephone number is clearly displayed at the site entrance and residents are encouraged to immediately contact the site in the event of any off-site issues that might be attributable to site operations being detected.

20.2 Complaints Investigation Procedure

1. Complete a Complaints Record Form (only trained operatives authorised).
 2. Once completed, the form must be passed onto a member of the Compliance Team.
 3. An investigation is undertaken to determine presence/absence, characteristic and intensity of issue. The time of the complaint will be linked with site activities. Review the Site Diary to determine if any abnormal site operations/conditions were at the time of the complaint.
 4. A member of the Compliance Team will determine the appropriate action necessary to remedy/mitigate the causes of the identified complaint.
 5. Specialist advice will be sort if deemed necessary.
 6. Any actions taken will be recorded in the Site Diary.
 7. Written confirmation or any actual or potential pollution incidents must be submitted to the Environment Agency Permitting Officer within 24 hours of detection. (Information at front of document)
 8. All complaint forms will be available for inspection by representatives of regulatory bodies.
- 20.2.1 All complaint forms will be available for inspection by representatives of regulatory bodies.

21 Leakages or Spillages Procedure

21.1.1 On identification of a **Leak or Spillage** the following procedure is to be followed to:

1. Prevent unauthorised access to the affected area
2. Prevent uncontrolled escape of potentially contaminating liquids using supply of absorbent materials to control the flow of liquids.
3. If safe to do so, isolate source of leak/spillage to prevent further losses, which may involve switching off a particular piece of machinery & deploying a containment vessel (i.e. drip trays) underneath the affected area.
4. If necessary, sand bags will be deployed to prevent any spillage/leakage entering the drainage system and from escaping the permitted boundary.
5. If necessary, initiate controlled evacuation of the site.
6. All contaminated absorbents, must be placed in a leak proof container, which is labelled & stored pending removal.
7. Seek specialist advice on decontamination of the site surfaces if necessary
8. Complete an Environmental Incident Record Form (See [Appendix EMS1](#))
9. Any actions taken will be recorded in the Site Diary.
10. Written confirmation of any actual or potential pollution incidents must be submitted to the Environment Agency via the sites Permitting Officer within 24 hours. ([Information at front of document](#))
11. Confirm site cleanup with the Environment Agency. ([Information at front of document](#))
12. Replenish supplies of absorbent materials.

22 Equipment & Machinery Malfunction & Failure Procedure

22.1.1 On identification of any **Equipment or Machinery Malfunctions or Failures** the following procedure is to be followed to:

1. Cease operations immediately & determine if continuation of use poses a significant risk to health or the environment.
2. If continuation poses a significant risk, switch the piece of equipment off & isolate the affected equipment.
3. Notify a Responsible Person who will instruct the appropriate maintenance personnel or external contractor to undertake necessary repairs.
4. Notify Environment Agency Permitting Officer if the malfunction or failure could cause pollutants to escape the permitted boundary. (Information at front of document)
5. Complete an Environmental Incident Record Form. (See Appendix EMS1)
6. Any actions taken will be recorded on the Site Diary.
7. Written confirmation of any actual or potential pollution incidents must be submitted to the Environment Agency via the sites Permitting Office within 24 hours. (Information at front of document)

23 Non-Conformance Procedure

1. Non-conformance identified.
2. A Non-Conformance Record form is completed (see Appendix EMS3) and passed to a member of the Compliance Team.
3. A member of the Compliance Team initiates an investigation of the non-conformance & then ascertains potential impacts on the environment and how serious any potential effects could be.
4. Once the non-conformance has been assessed, action will be taken to remedy the cause.
5. All actions will be recorded on the Site Diary.
6. In the event of an emissions release that has caused, is causing or may cause significant pollution, the Environment Agency will be notified within 24 hours, advice taken and action recorded on the Site Diary.

24 Periodic Review

26.1.1 The adequacy of this EMS will be review considering any non-conformance and at least every two years. If any amendments to the EMS are required, the Environment Agency will be provided with an updated version.

Appendix EMS1: Environmental Incident Record Form

Date & time of the incident	
What happened, what was it about?	
Was anyone else aware of this – other witnesses? If so, who?	
What caused it?	
What have you done to make sure that it does not happen again?	
Was there any significant pollution or environmental damage to land, water, or protected areas – for example: dust, odour or noise pollution outside the site or spillage of polluting liquids onto the ground, or at a site of special scientific interest, or into a drain or a watercourse? (If so, then complete an incident form)	
Is there a continuing threat? Yes/No	
If there was (or still is), then you must take steps to prevent further damage and notify the Environment Agency on 0800 807 060 and any other relevant regulators ASAP. Have you done so? Yes / No	Who did you phone? At what time did you phone?
You must also write or send an email to confirm this to the local office (see your accident management plan for the address) Have you done so?	Yes/No What date did you contact?
Please print your name, date, and sign:	

Appendix EMS2: Complaint Record Form

Who made the complaint?	Name:	
	Address	
	Phone No	
Date and time they made the complaint		
What happened, what was it about?		
Was anyone else aware of this – other neighbours or your staff? If so, who?		
Did the complaint relate to your site? If so, what happened? What went wrong?		
What have you done to make sure that it does not happen again?		
Was there any significant pollution or environmental damage to land, water, or protected areas – for example: dust, odour or noise pollution outside the site or spillage of polluting liquids onto the ground, or at a site of special scientific interest, or into a drain or a watercourse? (If so, then complete an incident form)		
If there was, then you must take steps to prevent further damage and notify the Environment Agency on 0800 807 060 and any other relevant regulators ASAP. Have you done so? Yes / No		Who did you phone? At what time did you phone?
You must also write or send an email to confirm this to the local office (see your accident management plan for the address) Have you done so?		Yes/No What date did you contact?
Please print your name, date, and sign:		

Appendix EMS3: Non-Conformance Record Form

Date and time non-conformance identified	
What happened, what was it about and what permit condition does it relate to?	
What caused it? i.e., what happened that should not have happened OR what didn't happen that should have?	
What has been done to make sure that it does not happen again?	
Has the site EMS been reviewed in light of the incident and have any changes to operations and procedures been rolled out in response? Include dates.	
Was there any significant pollution – for example: oil entering a surface water drain. If so, what?	
If there was then you must notify the Environment Agency on 0800 807060 ASAP. Have you done so?	Yes/No/not applicable Time: Date: EA. Incident number:
Print name, date, and sign	

Appendix EMS4: Environment Agency Notification Form

Part A

(a) Notification requirements for any malfunction, breakdown or failure of equipment or techniques, accident, or emission of a substance not controlled by an emission limit which has caused, is causing or may cause significant pollution	
To be notified within 24 hours of detection	
Date and time of the event	
Reference or description of the location of the event	
Description of where any release into the environment took place	
Substance(s) potentially released	
Best estimate of the quantity or rate of release of substances	
Measures taken, or intended to be taken, to stop any emission	
Description of the failure or accident	

(b) Notification requirements for the detection of any significant adverse environmental effect	
To be notified within 24 hours of detection	
Description of where the effect on the environment was detected	
Substance(s) detected	
Concentrations of substances detected	
Date of monitoring/sampling	

Part B-to be submitted as soon as practicable

Any further accurate information on the matters for notification under Part A	
Measures taken, or intended to be taken, to prevent a recurrence of the incident	
Measures taken, or intended to be taken, to rectify, limit or prevent any pollution of the environment which has been or may be caused by the emission	
The dates of any unauthorised emissions from the facility in the preceding 24 months	
Name*	
Post	
Signature	
Date	

*Authorised to sign on behalf of operator

Appendix EMS5: Accident Investigation Forms

Site Details:

Date of Accident:	Time:
Site of Accident:	Site Manager/Supervisor at Time of Event:

The injured person (If required)

Name of Injured Person:	Date of Birth or Age:
Nature of Injuries:	Part of Body Injured (Tick as Appropriate)
	Hands, Wrists, Finger
	Feet, Ankles, Toes
	Legs, Knees, Hip, Thigh
	Eyes
	Head, Face, Neck
	Torso
Back, Spine	
First Aid Treatment:	
Hospital Treatment & Contact Address/Telephone:	
Follow Up Treatment (If Any)	

Details of Accident (Please Detail Location Onsite):

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For Office Use Only:

Time Off Work (Seven Days RIDDOR):	
Recorded in Accident Logbook: Y/N	Accident Logbook Number:
RIDDOR Reportable: Y/N	RIDDOR Report Number:
Further Investigation Required: Y/N	
Note: Use the accident log number for investigation.	
Distribution: Office/Site File/Client/Other (Please Specify)	

Continuation box for any additional information or information not able to be entered in other boxes:

Print Name:	Date:
Position:	Signature:

Instructions for reporting accidents: -

All work in the immediate area will cease and the working area is to be made safe.
In the event of an accident the extent of the injuries will be immediately assessed by the first aider: -

1. If the injuries sustained are of minor nature than the first aid provider will apply first aid to the injuries and make appropriate recommendations to the injured person.
2. If the injuries sustained are of a significant or serious nature, then the first aid provider will administer as much first aid as they are capable of/comfortable to deliver & make the injured person as comfortable as possible while the emergency services are contacted.

Appendix EMS6: Site Infrastructure Plans

TBC

Appendix EMS7: Climate Change Risk Assessment

Potential changing climate variable	A Impact	B Likelihood	C Severity	D Risk (B x C)	E Mitigation (What will you do to mitigate this risk)	F Likelihood (After mitigation)	G Severity (After mitigation)	H Residual risk (F x G)
1. Summer daily maximum temperature may be around 7°C higher compared to average summer temperatures now.	There is the potential for increased temperatures for dust/odour increase from the drying of wastes. However, it is not expected that the activities onsite will give rise to significant dust/odour emissions due to the nature of the wastes handled.	3	2	6	Emissions mitigation measures already addressed within EMS. Materials are removed on an ongoing basis, based on the maximum storage times specified within the Permit are not exceeded. Regular site cleaning and use of water provisions to keep temperatures down. Ensure water supplies are sufficient and potential for consideration around harvesting rainwater in winter months for use in summer. Consideration for the shading of electrical equipment is exposed to direct sun light. Ensure housekeeping arrangements are maintained to a good standard to prevent any vegetation growing around the site and wastes are contained within storage areas. Managing suitable segregation and separation of wastes. Regular inspection and preventative maintenance of the site, plant, or equipment.	3	1	3

2. Winter daily maximum temperature could be 4°C more than the current average, with the potential for more extreme temperatures, both warmer and colder than present.	No negative impact foreseen.	3	2	6	Emissions mitigation measures already addressed within EMS. Materials are removed on an ongoing basis, based on the maximum storage times specified within the Permit are not exceeded	3	1	3
3. The biggest rainfall events are up to 20% more intense than current extremes (peak rainfall intensity)*.	There is potential for an increase in surface water run off that would not cause disruption to operations. The increase in surface water could increase the number of times the interceptor is emptied during wetter periods. Potential for areas benefitting from hardstanding surface to pond if the surface cannot manage the amount of rainfall percolating through.	3	2	6	Increased monitoring of interceptor & drainage system during periods of wetter weather. Weather forecast to be monitored. Ensure drainage arrangements/systems are adequate and sufficient in the event of an increase in rainfall. Drainage systems are inspected and maintained as required.	3	1	3
4. Average winter rainfall may increase by 36% on today's averages.	There is potential for an increase in surface water run off that would not cause disruption to operations. The increase in surface water could increase the number of times the interceptor is emptied during wetter periods. Potential for areas benefitting from hardstanding surface to pond if the surface cannot manage the amount of rainfall percolating through.	3	2	6	Increased monitoring of interceptor & drainage system during periods of wetter weather. Weather forecast to be monitored. Ensure drainage arrangements/systems are adequate and sufficient in the event of an increase in rainfall. Drainage systems are inspected and maintained as required.	3	1	3
5. Sea level could be as much as 0.6m higher compared to today's level*.	No negative impact foreseen as the site is located inland.	3	2	6	Increased monitoring of interceptor & drainage system during periods of wetter weather. Weather forecast to be monitored. Ensure drainage arrangements/systems are adequate and sufficient in the event of an increase in rainfall. Drainage systems are inspected and maintained as required.	1	1	1

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					maintained as required.			
6. Drier summers, potentially up to 42% less rain than now.	There is the potential for increased temperatures for dust/odour increase from the drying of wastes. However, it is not expected that the activities onsite will give rise to significant dust/odour emissions due to the nature of the wastes handled.	3	2	6	Emissions mitigation measures already addressed within EMS. Materials are removed on an ongoing basis, based on the maximum storage times specified within the Permit are not exceeded. Review Environmental Risk Assessment Documentation. Regular inspection and preventative maintenance of the site, plant, or equipment.	3	1	3
7. At its peak, the flow in watercourses could be 35% more than now, and it could be 75% less than now.	Low flow could potentially impact the mains water used onsite if there was a wider impact on the water supply network.	3	2	6	Increased monitoring of stockpiles & materials are removed on an ongoing basis, based on the maximum storage times specified within the Permit are not exceeded. Main's water supplies only used when necessary.	3	1	3
8. Storms	Storms could see a change in frequency and intensity. The unique combination of increased wind speeds, increased rainfall, and lightning during these events provides the potential for more extreme storm impacts.	3	2	6	Increased monitoring of interceptor & drainage systems during periods of wetter weather and ongoing monitoring of infrastructure to ensure it is secure and suitable. Weather forecast to be monitored. Review structures and any vulnerabilities if weaknesses are highlighted. Regular inspection and preventative maintenance of the site, plant, or equipment.	3	1	3