



HIGH HEDLEY BIOGAS PLANT

A PROJECT BY W. J. DRENNAN

ENVIRONMENTAL MANAGEMENT SYSTEM

This Management System (MS) document is the property of WJ Drennan. The Management System has been developed based upon known activities and information available at the time of preparation.

The Management System provides the procedures necessary to operate the facility in accordance with the conditions of the relevant Standard Rules Environmental Permit and to meet the wider requirements for this type of operation set out within the Environmental Permitting (England & Wales) Regulations 2010 (SI 2010 No. 675), the Waste (England and Wales) Regulations 2011 (SI 2011 No. 988) and Regulation EC 1069/2009 and Regulation EC 142/2011

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CONTROLLED COPY

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1. INTRODUCTION

1.1 BACKGROUND

1.1.1 A management system has been produced for the Anaerobic Digestion site and associated gas to grid entry unit ('the facility'), which is operated by WJ Drennan Ltd ('the Operator'). The relevant details are provided below.

Site Name:	High Hedley Biogas Plant
Site Address:	High Hedley Hope Farm, East Hedley Hope, Durham, DL13 4PR
Company Name ¹ :	WJ Drennan Ltd
Company Address ² :	As above
Authorisation Ref ³ :	EPR/LB3536AZ - Environment Agency Permit
Authorisation Type:	Section 5.4 (a)(i) and (b)(i) - non-hazardous waste installation – biological treatment
Authorisation Date ⁴ :	28/07/2014
Operator Name ⁵ :	WJ Drennan Ltd
Insert a copy of the relevant authorisation into the Miscellaneous Appendix.	

Notes ¹ Name of company undertaking the operations under the MS and ² head office
³ Reference number of relevant waste authorisation for the site and ⁴ date issued
⁵ Name of the company to whom waste authorisation is registered

1.1.2 This Management System (MS) has been produced to meet the specific requirements of the Permit and provides the procedures necessary to operate the facility in compliance with the Permit and to meet the wider requirements for this type of waste operation set out within the Environmental Permitting (England & Wales) Regulations 2010 (SI 2010 No. 675).

The MS has also been produced to meet the specific requirements of the AHVLA requirements as set out and enforced by Regulation EC 1069/2009, Regulation EC 142/2011 and the Animal By-Products Enforcement (England) Regulations 2011.

1.1.3 The MS has been developed with reference to the Environment Agency's *Guidance on "developing a management system" and "controlling and monitor your emissions for an environmental permit."* and *"How to Comply with your Environmental Permit Additional Guidance for: Horizontal Guidance Note H6 - Environmental Management Systems"* (April, 2010).

The MS has also been developed with reference to Defra Guidance on AD operations as set out in: *AHVLA Guidance on Composting and Biogas (Anaerobic Digestion) of Animal By-Products in Approved Plants for Industry.*

Other relevant guidance has also been referred to, as appropriate.

1.2 KEY COMPONENTS

1.2.1 The MS provides the relevant procedures for the key components of an environmental management system (EMS). These key components are dealt within the following sections of the MS manual:

2. **Management and Staff Responsibilities**
3. **Resource Management**
4. **Operations and Maintenance**
5. **Emergency Planning**
6. **Environmental Management System**
7. **Environmental Reporting**

1.3 DISTRIBUTION AND AUTHORISATION RECORDS

1.3.1 It is the overall responsibility of the Company Directors to authorise and be accountable for the suitability and implementation of this Management System.

1.3.2 It is the responsibility of the **Technically Competent Manager** to ensure that it is reviewed and maintained such that it remains fit for purpose. However, this will be under the ultimate direction and accountability of the Company Directors.

1.3.3 The controlled distribution of the MS manual is detailed in Table 1.

1.3.4 A Controlled Copy will be retained at the Site, with a further Controlled Copy held by the **Technically Competent Manager** at the Head Office (the Master Copy).

1.3.5 Issue of controlled copies can either be completed via email direct to the recipient, or in hard copy using the issue receipt in Table 2 overleaf.

1.3.6 Acknowledgement of receipt must be obtained from the recipient. If the MS manual is issued electronically this should be via return email, and if the MS manual is issued in hard copy, the recipient should complete the issue receipt in Table 2 and return the photocopied page. **This acknowledgement must be retained in the Miscellaneous Appendix of the Master Copy of the MS manual.**

Table 1: Management System controlled copyholders

Copy No.	Recipient	Location
1	Site Operatives	Site
2	Technically Competent Manager	Head Office

- 1.3.7 Any revisions made to the “Master Copy” shall be issued to all other controlled copyholders. It is then the responsibility of the controlled copyholder to amend their MS manual as revisions are received.
- 1.3.8 The document issue status is as indicated in Table 3 in Section 1.4. Dates and scope of revision will be as set out in the updated revision record in Table 3.

Table 2: Controlled Copy Issue Receipt

Copy No.	Recipient	Date Issued	Date Received	Signature*
1	Site Operatives			See individual signature records
2	Company Director			See individual signature records

* Only if MS is issued in hard copy format

1.4 REVISION RECORD

- 1.4.1 Minor changes to the MS manual (e.g. changing a name on the organisation chart) do not require a re-brief of the MS manual to the site staff. These can be recorded below by entering the issue number and AMD, e.g. 1 (AMD).
- 1.4.2 Major changes, or six subsequent minor changes, do require a full briefing to the site staff and a new issue number.

The continuation sheet for this table must be retained in the Miscellaneous Appendix of the Master Copy of the MS manual

1.5 BRIEFING OF THE MANAGEMENT SYSTEM

- 1.5.1 This MS manual, and any subsequent revision, must be briefed to all site-based staff, and will typically be recorded on separate Toolbox Talk records. This includes any agency personnel or sub-contractors employed by the Company so as to execute their responsibilities with respect to compliance with the Permit.
- 1.5.2 Minor changes to the MS manual (e.g. changing a name on the organisation chart) do not require a re-brief of the MS to site staff.
- 1.5.3 Major changes, or six subsequent minor changes, do require a full briefing to the site staff (see Section 1.6 for the current revision status).

Responsibility: It is the responsibility of the **Technically Competent Manager** (or, in his absence, a nominated deputy) to ensure that the MS is communicated to site staff and that this is recorded.

2. MANAGEMENT AND STAFF RESPONSIBILITIES

2.1 MANAGEMENT

2.1.1 The **Company Directors** have overall responsibility for:

- appointing persons required to implement the environmental objectives;
- providing the necessary resources for implementing and improving the Management System (MS) and meeting associated environmental objectives
- monitoring and managing the activities of the **Technically Competent Manager**;
- agreeing measurable environmental objectives for the site; and
- providing sufficient resources to enable the implementation of the MS and Permit compliance.

2.1.2 The **Technically Competent Manager** has responsibility for:

- introducing, reviewing and maintaining this MS to facilitate the appropriate operation of the permitted facility;
- ensuring that the Management System requirements are established, implemented, maintained and reviewed;
- monitoring implementation of the Management System at the site;
- agreeing and communicating responsibilities on site; and
- communicating measurable environmental objectives to the Site Staff including their awareness of potential environmental impacts.

2.1.3 The **Plant Manager** has responsibility for:

- implementing operational aspects of the MS;
- liaising with the **TCM** and **Operational Staff** on all aspects affecting site operation and Permit compliance;
- maintaining operational systems to meet MS and Permit requirements;
- communicating operational requirements to **Operational Staff**;
- ensuring the effective and compliant operation of the AD and gas to grid process.

2.1.4 The site **Operational Staff** have responsibility for:

- complying with operational instructions;
- reporting issues and concerns;
- maintaining agreed information, recording and reporting systems;
- working in a safe and environmentally compliant manner;
- contributing, as required, to the development and implementation of systems and procedures; and
- complying with the requirements of the Management System and the Environmental Permit and any other instructions, as reasonably required from time to time.

2.2 OPERATIONAL STAFF

- 2.2.1 The **Technically Competent Manager**, in conjunction with the **Plant Manager** will ensure that all operational staff are aware of the importance of the implementation of the Management System and their responsibilities towards this.
- 2.2.2 Individual responsibilities are set out within this MS manual and operational staff have a duty to fulfil these specific responsibilities. Regardless of particular assigned responsibilities, operational staff have the overarching responsibility to ensure that the Management System is properly and consistently implemented, that any and all deviations are reported and that any defined environmental objectives are met.

2.3 ALLOCATION OF RESPONSIBILITIES

- 2.3.1 The allocation of responsibilities for the tasks that comprise the Management System is set out within this MS manual and the associated appendices.

2.4 ENVIRONMENTAL POLICY

- 2.4.1 The COMPANY is committed to ensuring that its activities are conducted in accordance with sound environmental practices, with a Policy (WD/23/0814) included as Appendix MS7.

3. RESOURCE MANAGEMENT

3.1 STAFFING

3.1.1 The Company will ensure that the necessary staff resources are available at all times to implement the MS for the operation of the facility.

3.1.2 When considering staff resources, the Company will ensure that all staff are competent to fulfil their relevant role on the basis of applicable experience, skills, education and training.

Responsibility: it is the responsibility of the **Company Directors** to identify the requirement for, and calibre of, staff to implement the MS.

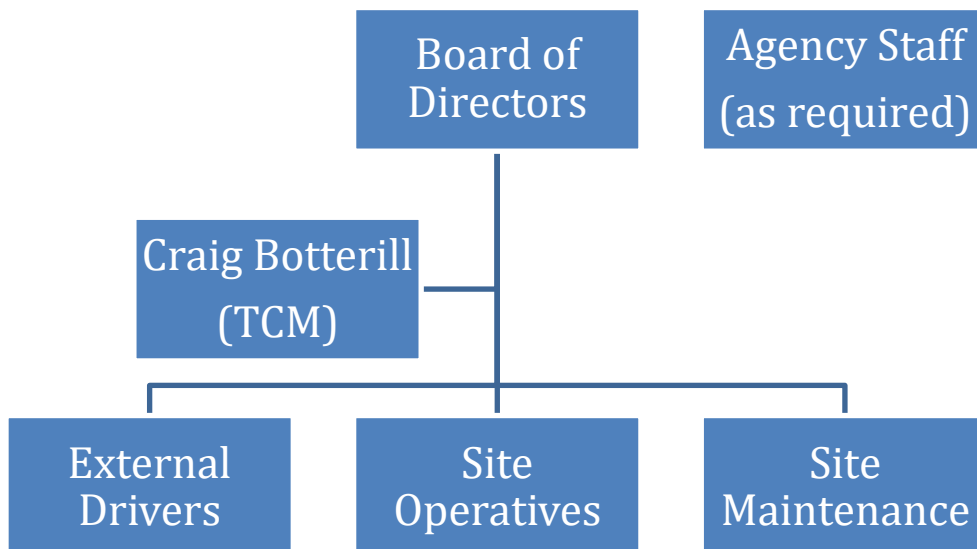
Responsibility: it is the responsibility of the **Technically Competent Manager** to liaise with the Plant Manager and company directors to report on staffing requirements for implementing the MS.

Responsibility: it is the responsibility of the **Plant Manager** to liaise with **Operational Staff** and the **TCM** to identify day to day staffing requirements for implementing the MS.

3.2 ORGANISATION

3.2.1 The organisational structure relevant to the operation of the site is fairly simple, with the operatives undertaking waste activities reporting to the **Technically Competent Manager** and **Plant Manager** (see below).

Administrative support is provided through a number of office staff who undertake the financial, HR and other support functions.



3.3 STAFF TRAINING

Implementing the Management System

- 3.3.1 The MS manual will be communicated to the staff identified in Section 3.2.1, as well as any agency personnel or sub-contractors, as required.
- 3.3.2 To ensure the MS can be implemented effectively and efficiently, all relevant site and office-based staff, including any agency personnel or sub-contractors, will need to be trained as respects the requirements of the MS, and the associated Accident Management Plan (AMP), as it affects those individuals' work activities and responsibilities.

Training Needs Assessment

- 3.3.3 **Training needs assessment:** all operatives and any contractors, including agency staff, working at the facility will need specific environmental awareness training (WD/29/0814). In essence, these are anyone working on the site, operating equipment and carrying out waste related activities, whether on an employed, permanent, part time, or agency basis. This is also to include incoming drivers delivering and removing materials from site as their actions can have an environmental impact on site operations.
- 3.3.4 Office-based staff do not need the same level of training in environmental awareness and their training needs will be assessed separately, where appropriate.
- 3.3.5 **Key posts:** these have been identified as the site staff (operations and maintenance) and technically competent manager.
- 3.3.6 **Environmental permit awareness:** both operational and any office-based staff will need to be trained as respects the requirements of the Permit conditions as they affect the individuals' work activities and responsibilities; this will be recorded and training records retained at Appendix MS5. Refresher training will be given at least annually.
- 3.3.7 **Review:** the training needs assessment and training programme will be reviewed at least annually and the outcome recorded. The current training programme and records will be provided at Appendix MS5.

Responsibility: the **Technically Competent Manager** is responsible for undertaking/recommending/organising and recording the training needs assessment and recording any training undertaken, whether internal or external.

General Training Requirements

- 3.3.8 In addition to any training specific to their role in implementing the MS and AMP and complying with the conditions of the Permit, the following general training requirements have been identified and will be implemented and recorded:
- a) Site machine drivers/operators engaged at the site will be appropriately trained

in the operation of the site machine(s) and this will include relevant health and safety aspects. The training will be provided by approved instructors (either internal or external).

- b) Staff required to record information relevant to the operation of the MS and compliance with the Permit will need to be trained on the record keeping requirements (electronic and paper-based).

3.3.9 **Reporting:** all staff will be instructed to report any deviations from the MS, including any and all conditions of the Permit, to the **Technically Competent Manager**; this will include 'near misses'. The **Technically Competent Manager**, or other **authorised person** will then notify the Environment Agency and/or Health and Safety Executive, if appropriate.

3.3.10 **Risks from contracts work:** all contractors will be issued with appropriate Work Instructions prior to allowing them to start on site. These instructions will include environmental control requirements relevant to their work. Contractors will be instructed to report any incident that they see on the site, or as a result of their own work, that could damage the environment (water, air or land) to the **Technically Competent Manager** (or other **authorised person**).

Competence

3.3.11 The site activities fall within the requirements of an approved competence scheme; and suitably qualified personnel (or external contractors) will provide the necessary technically competent persons provisions for the operation of the facility. Attendance on site will be logged within the site diary records and **the relevant (copy) certificate(s) will be retained in Appendix MS5 of the Master Copy of the MS manual**. Continuing competence certification will also be retained in order to ensure that the necessary provisions are being met on an ongoing basis.

3.3.12 The standards set out in the CIWM/WAMITAB approved competence scheme as applicable to the operation of an anaerobic digestion facility will be used for this purpose (4MBTAD6, or VRQ6b).

Supporting the Management System

3.3.13 In addition to the specific requirements outlined above, the **Technically Competent Manager**, supported by the **Plant Manager** will promote the content and importance of the Management System to Site Staff by "toolbox talks" which will be undertaken as deemed appropriate; will evaluate the performance of staff and will discuss proposals for improvements.

3.3.14 Staff will be encouraged to contribute their suggestions for improvements to this Management System. The **Technically Competent Manager** will have the role of reviewing suggested improvements and incorporating into the MS manual, where appropriate.

3.3.15 It is recognised that contractors can be a significant contributor to the environmental impact of the activities undertaken on site, therefore they will be clearly inducted onto the site to ensure that they are aware of their roles and responsibilities in relation to the permit and this management system.

4. OPERATIONS AND MAINTENANCE

4.1 GENERAL OPERATIONAL COMMITMENTS

4.1.1 **Commitment:** The Company is committed to operating its facilities in a manner that will minimise potential impacts to the environment.

4.1.2 **Site inspection:** The Company is committed to undertaking checks and inspections of its site plant, equipment and work activities that might have an adverse impact on the local environment. This is to be undertaken and reported on a working daily basis. **Appendix MS1** provides examples of the reporting forms that we will use for both plant and the facility. Inspections will be on a nil reporting basis – that is, if nothing untoward is found, a record will still be made.

Responsibility: It is the responsibility of the **Site Staff** to undertake the site inspections on a daily basis and the responsibility of the **Technically Competent Manager** (or nominated deputy in their absence) to ensure the Report Forms are completed and any identified exceptions are dealt with or reported to senior management for further action, as appropriate.

4.1.3 **Operational procedures:** As the holder of a Bespoke Environmental Permit an Environmental Risk Assessment has been undertaken in line with H1 Guidance to identify the aspects that demand particular attention. The site controls are set out in the general operational procedures, including waste acceptance procedures, for the facility which are provided at **Appendix MS2**; additional specific procedures are also provided at **Appendix MS3** (fugitive emissions and spillage) as well as the other measures set out in the associated Accident Management Plan (AMP), a copy of which is also held on site.

The Company commitment (4.1.1) informs the day to day operation of the site and in particular the application of the Waste Hierarchy as required by the Waste (England & Wales) Regulations 2011. Wherever practical the following hierarchy will be applied:

Prevention/Reduction
Preparing for Re-Use
Recycling
Other Recovery
Disposal

Clearly, with the main operation of the site being AD, 'other recovery' is the primary hierarchy position, nevertheless, some activities do support the wider operation of the waste hierarchy, such as the eventual deployment of digestate for landspreading, together with the medium term objective of achieving the PAS110 standard.

4.1.4 **Monitoring procedures:** see Site Inspections at Section 4.1.2 and Operational Procedures at Section 4.1.3, as well as **Appendix MS2** and **Appendix MS3** as

well as other relevant procedures set out within the associated Accident Management Plan.

Responsibility: It is the responsibility of the **Technically Competent Manager** (or nominated deputy in their absence) to ensure that the site monitoring is undertaken by the Site Staff and any identified issues are dealt with or reported for further action, as required.

4.1.5 **Site security:** the site is in an agricultural setting, with footpaths and as a result security of the site is difficult to maintain through fencing. Vehicle access is limited to the main gates, which are locked when the site is unmanned

4.1.6 Site security will be part of the site inspection at Section 4.1.2.

4.2 **PLANNED PREVENTATIVE MAINTENANCE**

Provision of Plant and Equipment

4.2.1 **Provision of plant and equipment:** the Company will ensure that appropriate plant and equipment are provided for the operations undertaken at the Facility. Plant and equipment on hire will be obtained from reputable suppliers.

Scope and Requirement for Planned Preventative Maintenance

4.2.2 Many pollution incidents reported to the Environment Agency can be traced back to a maintenance failure. It is important, therefore, that the MS includes a plan for proactive and preventative maintenance of the plant and equipment used on the site.

4.2.3 **Inclusion in the Planned Preventative Maintenance (PPM) programme:** all plant and equipment that have recommendations, provided by the manufacturer, supplier or installer, for preventative maintenance will be deemed to have been identified as falling within this section.

4.2.4 Any plant and equipment that do not have specific recommendations will be reviewed and assessed as to the appropriate maintenance measures. Any and all equipment deployed permanently at the facility will take first priority as respects their maintenance. Those brought to the facility on an occasional basis will take second priority, until they are about to be deployed at the facility when their maintenance record will be examined for compliance.

Responsibility: It is the responsibility of **Site Maintenance Staff** for the site to identify the appropriate maintenance measures for plant and equipment and to ensure that these are implemented, as required.

4.2.5 **The Planned Preventative Maintenance (PPM) programme:** for the majority of items of plant and equipment the programme of maintenance will be that recommended by the manufacturer, supplier, installer or, in the absence of which, as devised by the **Site Maintenance Staff**, in consultation with others.

Responsibility: It is the responsibility of the **Site Maintenance Staff** to ensure that the PPM regime is implemented and any identified maintenance issues are

dealt with or reported to senior management for further action, as required.

- 4.2.6 In addition to any Planned Preventative Maintenance regime for plant and equipment identified under Section 4.2.5, there is also a commitment to check such items on an appropriate basis – see commitment under Section 4.1.2.

Responsibility: It is the responsibility of the **Site Maintenance Staff** to ensure that items of plant and equipment are checked in accordance with appropriate intervals. This interval will be determined by the item of plant/equipment and its normal use, as well as other operational factors that may be identified from time to time. Issues will be discussed and reported to senior management for further action, as required.

Testing and Inspection

- 4.2.7 In addition to any PPM programme for plant and equipment identified under Section 4.2.3, there is also a commitment to monitor such items on a working daily basis, as appropriate – see commitment under Section 4.1.2.

Responsibility: **Site Maintenance Staff** are responsible for checking items on a working daily basis and recording the findings on the check sheets provided.

- 4.2.8 Results of inspections by the Site Staff are to be compiled on a working daily basis by the **Site Maintenance Staff** for action, as appropriate.

4.3 AUDITING

- 4.3.1 **Availability of audit results:** audit results are compiled by the Site Staff on a working daily basis (Section 4.1.2) and reported to the **Technically Competent Manager** for action, as appropriate. Any audits/inspections undertaken by third parties will also be made available to the **Technically Competent Manager**. The **Technically Competent Manager** will report the findings of any audit to senior managers, as appropriate.

- 4.3.2 As part of the audit process, monthly Management Meetings will be held at which the **Technically Competent Manager** and **Plant Manager**, together other individuals as may be appropriate. These meetings will be based around the standard agenda (WD/44/0814).

- 4.3.2 **Environmental performance auditing:** the Company will conduct a formal review at least on annual basis to determine the site environmental permit performance (WD/40/0814). A record of any significant updates made to the Management System as a result of the audit will be retained in Table 3.

5. **EMERGENCY PLANNING**

5.1 **ACCIDENT MANAGEMENT PLAN**

- 5.1.1 **Accident Plan:** the potential environmental impacts of the operations at the site, their consequences, preventative management measures and emergency actions to take in the event of an occurrence are all identified in the Accident Management Plan for the facility, a copy of which is held on site (WD/05/0814).
- 5.1.2 **Training:** the procedures set out within the Accident Management Plan will be communicated clearly to all employees and contractors who work at the facility. This will form part of the training of all staff set out in Section 3.3.2.

5.2 **INCIDENT REPORTING**

- 5.2.1 **Referrals by Site Staff:** any referrals made in accordance with Section 3.3.8 will be addressed to and assessed by the **Technically Competent Manager** (or other authorised person). They will be investigated and any remedial action, if required, implemented and reported, if appropriate, to the Environment Agency.
- 5.2.2 **Complaints:** any complaints about the site operations and/or its impact on the environment made by third parties (including Contractors in accordance with Section 3.3.9) will be passed to the **Technically Competent Manager** (or other authorised person) in the first instance. A note of the complaint will be made initially by the site operative in the complaints register in the Site Diary (**Appendix MS4**) and they will either resolve it themselves, or take other actions as may be appropriate, such as referring it to the **Technically Competent Manager** (or other authorised person), or the Regulator. All investigations and remedial actions taken following such reports will be recorded in writing.
- 5.2.3 **Incident reporting:** all incidents reported in accordance with Sections 3.3.8, 3.3.9, 5.2.1 and 5.2.2 will be investigated by the **Technically Competent Manager** (or other authorised person). If necessary, suitable corrective action will be ordered and monitored as to its effectiveness and completion. This procedure will be iterated until satisfaction is assured. Any reporting to the Environment Agency will be undertaken by, or on the instruction of the **Technically Competent Manager** (or other authorised person). All reports under this Section will be recorded in writing using form WD/21/0814.

5.3 **AUDITING AND REVIEW**

- 5.3.1 **Audit trail:** the reports made under Section 5.2.3 will be made in writing and the **Technically Competent Manager** (or other authorised person) will ensure that every complaint, incident and investigation is followed up until signed off as having been dealt with satisfactorily.
- 5.3.2 **Review:** the effectiveness of the emergency response regime, and the associated Accident Management Plan, and the need for any improvements will be reviewed at Management meetings (WD/44/0814) and at least annually as part of the environmental performance audit (see Section 4.3).

6. ENVIRONMENTAL MANAGEMENT SYSTEM

6.1 INTRODUCTION

6.1.1 Owing to the nature of the operations undertaken at the facility, it is not considered necessary to have an environmental management system (EMS) that is externally accredited; instead a simple EMS has been adopted and is set out below.

6.2 ENVIRONMENTAL RESPONSIBILITY

6.2.1 The Company ("WJ Drennan") will be the Permit holder for the facility and as the site Operator, will also be responsible for the implementation and operation of the permit.

6.3 PLANNING

6.3.1 Environmental performance auditing (see Section 4.3) will be used to identify those environmental aspects of the activities that are within our control and over which we can be expected to have influence. The potential for these aspects to have an adverse impact upon the environment will be reviewed.

6.3.2 Our procedure for the identification of, and access to, legal and other requirements that are applicable to the environmental aspects of our activities is through regular reviews of formal information sources, to include the Environment Agency, CIWM and Defra, as required.

6.3.3 The annual environmental performance audit (see Section 4.3.2) will be used to establish and maintain any identified improvements. This will include designation of responsibility for achieving any improvements at each relevant function and level of our organisation and the means and time-frame by which they are to be achieved.

6.3.4 The operations on site require only simple Objectives and Targets (WD/24/0814), with these forming the basis of the annual audit.

6.4 IMPLEMENTATION AND OPERATION

6.4.1 The annual environmental performance audit (see Section 4.3.2) will be used to define, document and communicate roles, responsibilities and authorities in order to facilitate effective environmental management. We shall provide sufficient resources essential to the implementation and control of the Management System.

6.4.2 The **Technically Competent Manager**, together with the **Plant Manager** will have the defined role, responsibility and authority for ensuring that Management System requirements are established, implemented, maintained and reviewed.

6.4.3 We have identified training needs (see Section 3.3) and will ensure that all personnel whose work may create a significant impact on the environment have received appropriate training (see Section 3.3).

- 6.4.4 We have established and shall maintain procedures to make our employees for each relevant function and level aware of the importance of the general environmental responsibility and of complying with the requirements of the Management System; in particular the following:
- the potential environmental impacts of their work activities;
 - their roles and responsibilities in achieving compliance including emergency preparedness and response; and
 - the potential consequences of departure from specified operating procedures.
- 6.4.5 We have established and will maintain procedures for internal communication between the various levels and functions of the organisation and for receiving, documenting and responding to relevant communications from external interested parties (see Section 5.2).
- 6.4.6 The annual environmental performance audit (see Section 4.3.2) will be used to identify those operations and activities that are associated with any identified significant environmental aspects. These activities will be planned, including maintenance, in order to ensure that they are only carried out under appropriate conditions (see whole of Section 4).
- 6.4.7 Before any process change is implemented at the facility or new infrastructure installed, the **Technically Competent Manager** will assess the potential environmental benefits and/or adverse impacts. Capital approval and purchasing will be guided by the results of these assessments, having regard to our commitment for continual environmental improvement.
- 6.4.8 We have established and will maintain our procedure to identify potential for and respond to accidents and emergency situations and for preventing or mitigating the environmental impacts that may be associated with them (see whole of Section 5).

6.5 CHECKING AND CORRECTIVE ACTION

- 6.5.1 The environmental performance auditing (see Section 4.3) will be used to monitor and measure the key characteristics of the operations and activities that can have a significant impact on the environment. This will also be used to evaluate compliance with the relevant environmental legislation and regulations.
- 6.5.2 The environmental performance auditing (see Section 4.3) will be used as a periodic system audit in order to determine whether or not the Management System conforms to our planned arrangements for environmental management and has been properly implemented and maintained.
- 6.5.3 This will also serve to review the Management System to ensure its continuing suitability, adequacy and effectiveness. The review will address the possible need for changes to policy, objectives and other elements of the Management System in the light of audit results, changing circumstances and our commitment to continual improvement. A copy of any amendments proposed to the Management System as a result of the review will be submitted to the Environment Agency for approval.

- 6.5.4 The **Technically Competent Manager** will be responsible for handling and investigating accidents or non-compliance, taking action to mitigate any impacts caused and for initiating and completing corrective and preventive action. They will be supported by the site staff and others, as appropriate. Under these circumstances the Management System and Accident Management Plan would be reviewed, as soon as practicable, with the result of the review used to inform changes in the documented procedures. A copy of any amendments proposed to the Management System and/or Accident Management Plan as a result of the review will be submitted to the Environment Agency for approval. A record of any significant updates made to the Management System will be recorded in Table 3.
- 6.5.5 The Management System and Accident Management Plan will also be reviewed if there is a significant change to the activities undertaken at the facility; such as a change in the nature of activities or major re-structure affecting the roles and responsibilities identified within the Management System. This review will be informed by an appropriate assessment of risk. A copy of any amendments proposed to the Management System as a result of the review will be submitted to the Environment Agency for approval. A record of any significant updates made to the Management System will be recorded in Table 3.

7. ENVIRONMENTAL REPORTING

7.1 INTRODUCTION

7.1.1 This section details what needs to be communicated and reported to the Environment Agency regarding the maintenance of the Environmental Permit and the timeframes for reporting in order to satisfy the needs of the Environmental Permit conditions. The section provides clarification on the roles and responsibilities for ensuring the reporting conditions of the Environmental Permit are fulfilled.

7.2 ENVIRONMENTAL PERMIT REPORTING REQUIREMENTS

7.2.1 In accordance with Permit Condition Schedule S4.2.2, WJ Drennan shall report the following requirements listed in Table 1 below on an ongoing basis. Except where otherwise specified all submissions to the Agency shall be in writing. These correspondences shall include the reference number and the name of the Permit holder.

Table 1 - Ongoing Environmental Permit Requirements

Reports	Contents (See above section for full contents of reports)	Conditions in Permit Satisfied by Reports	Deadline	Frequency
Emissions Monitoring	Concentrations of NO _x , CO, SO ₂ and VOCs in mg/Nm ³ at 273k, 101.3kPa and 5% O ₂	3.1	After monitoring completed	Annually
Quarterly Waste Returns	Information on the site and details of waste accepted and removed from site during previous quarter.	4.2.2	Within 1 month of the end of each quarter.	Quarterly.

7.2.2 An emissions monitoring schedule for point source emissions has been developed in accordance with the Permit Condition Schedule S4.2.2. Table 2 below provides details the monitoring approach for each emission source.

Table 2. Point Source Emissions Monitoring Plan

Source	Parameter	Emission Limit	Monitoring Standard or Method	Frequency
CHP	Oxides of Nitrogen (Expressed as NO ₂)	500mg/m ³	BS EN 14792	Annually
	Carbon Monoxide	1,400mg/m ³	BS EN 15058	Annually
	Sulphur Dioxide	350mg/m ³	BS EN 14791	Annually
	Total VOCs	1,000mg/m ³	BS EN 12619	Annually

7.2.3 Point source emissions from the CHP are monitored near the exit point of the exhaust stack on a straight length of duct. At this point, complete combustion has occurred. The pollutants that are monitored are gaseous species only which means that the sampling location does not have to take into account the requirements to measure flow and particulates. Due to the small diameter of the stack, a homogeneity test is not required. The sampling point is easily accessible and meets the requirements of Environment Agency Technical Guidance Note M1.

7.3 NOTIFICATIONS

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

- a) 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;
- b) the breach of a limit specified in the permit; or
- c) any significant adverse environmental effects.

7.3.2 Written confirmation of actual or potential pollution incidents and breaches of emissions shall be submitted within 24 hours.

7.3.3 Where the Environment Agency has requested in writing that it shall be notified when the operator is to undertake monitoring and/or spot sampling, the operator shall inform the Environment Agency when the relevant monitoring and/or spot sampling is to take place. The operator shall provide this information to the Environment Agency at least 14 days before the date the monitoring is to be undertaken.

7.3.4 The Environment Agency shall be notified within 14 days of the occurrence of the following matters except where such disclosure is prohibited by Stock Exchange rules:

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

7.3.5 Where the operator is a corporate body other than a registered company:

- a) any change in the operator's name or address; and
- b) any steps taken with a view to the dissolution of the operator.
- c) In any other case: the death of any of the named operators (where the operator consists of more than one
 - named individual);
 - any change in the operator's name(s) or address(es);
 - and any steps taken with a view to the operator, or any one of them, going into bankruptcy, entering into a composition or arrangement with

creditors, or, in the case of them being in a partnership, dissolving the partnership.

7.4 RELEVANT CONVICTIONS

7.4.1 In the unlikely event of the Permit Holder or a relevant person being convicted of any relevant offence, the full details will be provided to the Environment Agency within 14 days of the conviction, as will the details of any appeals.

7.5 COMMENCEMENT OR CESSATION OF OPERATIONS

7.5.1 Commencement of operations on the site will be notified to the relevant authority in writing in advance of operations commencing.

7.5.2 In the event of any future cessation and subsequent re-commencement of the use of the site for operations, the relevant authorities would be notified in writing specifying the date of any such cessation or re-commencement.

7.6 NOTIFICATION OF MONITORING AND/OR SPOT SAMPLING

7.6.1 Site personnel will notify the Environment Agency within 14 days of:

- Where the Environment Agency has requested in writing that it shall be notified when the operator is to undertake spot sampling.

7.7 SITUATIONS WHERE REPORTING IS TO BE “WITHOUT DELAY”

7.7.1 Site personnel will notify the Environment Agency within 24 hours following the detection of:

- Any malfunction, breakdown or failure of equipment or techniques, accident, or fugitive emission which has caused, is causing or may cause significant pollution.
- The breach of a limit specified in the Permit.
- Any significant adverse environmental health effects.

7.7.2 During normal working hours' site personnel will contact the Site Officer or the local Environment Agency Office by telephone. The Environment Agency National Incident Hotline number is: 0800 807 060.

7.8 NATIONAL RULES

7.8.1 There is also a requirement to notify the Competent Authority of events of non-compliance as set out under National Rules:

- If there is a malfunction of secondary abatement that cannot be fixed within 24 hours
- On other occasions where compliance cannot be restored within one month
- If there is any undue delay to planned changes to the combustion plant which would affect the applicable ELVs

APPENDICES TO THE MANAGEMENT SYSTEM

- MS1 Site Inspection Record
- MS2 Operation Procedures
- MS3 Procedure to Minimise Fugitive Emissions; Drainage and Spillage Procedure
- MS4 Complaints Register
- MS5 Training and Competence Records
- MS6 Environmental Incident Report and Record
- MS7 Environmental Policy

MISCELLANEOUS

APPENDIX MS1: SITE INSPECTION PROCEDURES AND RECORDS

This section contains a copy of the procedures used for the inspection of the facility and the associated Site Inspection Check List and Daily Plant Inspection Check List; a copy of each must be inserted behind this cover sheet. Completed copies will be retained as part of the facility diary.

APPENDIX MS2: OPERATIONAL PROCEDURES

This section contains copies of the key procedures (Waste Acceptance, Inspection, Rejection and Processing Procedures) that are relevant to the operation of the facility. A copy of these procedures must be inserted behind this cover sheet.

APPENDIX MS3: OPERATIONAL PROCEDURES TO MINIMISE ENVIRONMENTAL IMPACT OF OPERATIONS

This section contains a copy of the Operational Procedures to Minimise Fugitive Emissions AND the Drainage and Spillage Procedure. A copy must be inserted behind this cover sheet.

APPENDIX MS4: COMPLAINTS REGISTER

This section contains a copy of the blank Complaints Register. A copy will be maintained as part of the facility diary records.

APPENDIX MS5: TRAINING AND COMPETENCE RECORDS

This section contains copies of the Training and Competence Records, which are relevant to the operation of the facility. Copies must be inserted behind this cover sheet.

APPENDIX MS6: ENVIRONMENTAL INCIDENT RECORDS

This section contains blank copies of the Environmental Incident Records, to include the form completed (WD/21/0814) and also the diary record sheet (WD/19/0814). Working versions will be retained in the Site Diary.

APPENDIX MS7: ENVIRONMENTAL POLICY

This section contains the Environmental Policy for the Company. This will be communicated through the corporate website, or directly to external parties as deemed appropriate.

Miscellaneous Appendix

Miscellaneous documents which are relevant to the MS, but do not have a specified location, should have their details entered in the table below and then be inserted in to the MS manual behind this page.

Table 9: Miscellaneous documents added to the MS Manual

Document	Reference	Comments
Acknowledgement of MS receipt by controlled copy holder		
Copy of Environmental Permit		
Copy of Accident Management Plan		
Addition of Section 7: Environmental Reporting, and Gas to Grid activities	Section 7 – Environmental Reporting, Section 1, and Section 2	Document updates by WRM in March 2020. Environmental Leadership Limited was the author of the document.