



Ellgia Scunthorpe
Permit Variation Application

ELL/005

Environmental Management System

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ENVIRONMENTAL POLICY

Ellgia Ltd offers a total waste management and recycling service to Government departments, local authorities and industrial and commercial customers. We aim to maximise recycling of waste materials and avoid any disposal to landfill, through our own services and operations and the advice and support we provide to our customers. The primary objective of this policy is to minimise the environmental impact of our activities and assist our customers in minimizing the impact of their waste streams.

We develop and maintain systems and procedures to control risks to employees, the public and the environment. Collaboration is important, we work closely with suppliers and customers to achieve environmentally sound solutions for waste management and we are committed to continual improvement of our Environmental Management System (EMS) to enhance our environmental performance.

The principals of our environmental policy are:

- To comply with all legal and regulatory compliance obligations relating to our business.
- To promote environmental awareness throughout the organisation.
- Identify the environmental implications of our activities and establish mechanisms to minimise impacts.
- Ensure that staff are trained to recognise environmental risks and how to address them.
- Maintain an effective Environmental Management System that sets out detailed procedures for regulatory compliance and minimisation of environmental impact through:
 - o Preventing Pollution and fugitive emissions
 - o Increase Source Materials for Recycling
 - o Reduce energy consumption
 - o Reduce internal generated waste
 - o Recovery, Recycling and re-use waste materials wherever practicable
- Audit and review environmental performance on a regular basis and adapt processes and procedure to address any issues that arise.

Jack Lavington
Managing Director
4th December 2021

1. Purpose

The facility will implement a thorough infrastructure monitoring programme that will be designed to ensure there is no loss of integrity to the systems in place to prevent fugitive emissions to air, land and controlled waters.

The programme will be incorporated into the facility's Environmental Management System with the Inspection Schedule that outlines the frequency of the inspections and monitoring to be undertaken.

1.1 Elements of the Infrastructure Monitoring Programme

The infrastructure monitoring programme incorporates the elements listed below. The inspection and maintenance of operational equipment and process machinery, whose failure could have an impact upon the environment, has been addressed within the Planned Preventative Maintenance Review and the associated schedule.

1.2 Tank, Bund and Pipe work Inspections

All bulk storage tanks, the associated pipework and secondary containment will be inspected for signs of deterioration, damage and leaks. Where deficiencies are encountered, these will be reported using the incident and corrective action structure and repairs instigated.

1.3 Waste Vessels

The site uses dedicated containers and skips for storing various waste materials prior to sending them off site for further processing or disposal. These vessels will be inspected for signs of deterioration, damage and leaks. Where deficiencies are encountered these will be reported using the incident and corrective action structure and repairs instigated.

1.4 Hazardous Substances Stores

The dedicated hazardous substance storage areas for materials stored in containers such as drums will be inspected to ensure that no leaks or spills have occurred. The check will also inspect the containers for signs of damage. All storage areas will be checked, focussing on vessels that hold ≥ 100 litres. Where deficiencies are encountered these will be reported using the incident and corrective action structure and repairs instigated.

1.5 Underground Vessels

The underground sumps associated with the drainage system will be inspected to ensure that no leaks are occurring. The checks will involve the emptying, cleaning and CCTV testing of the structures. Where deficiencies are encountered these will be reported using the incident and corrective action structure and repairs instigated.

1.6 Hard Standing Inspection

The key areas of hard standing will be inspected to ensure that its integrity is not being compromised as part of the yard inspection. The key areas have been selected dependent on

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potential contamination and where delivery and collection vehicles carrying potentially hazardous materials occur. Where deficiencies are encountered these will be reported using the incident and corrective action structure and repairs instigated.

1.7 Site and Drainage System Inspection

Site drains and interceptors will be visually checked as part of a yard inspection to ensure they are not becoming blocked or damaged. CCTV assessments of site drainage system will also be undertaken on a regular basis.

Where necessary drains will be jetted by an external contractor. This work will be reported on the corrective action form. Where deficiencies are encountered these will be reported using the incident and corrective action structure and repairs instigated.

2. Deliveries & Collections

Spill kits are provided on site in the event of a spill of hazardous materials at the main delivery / collection points. All staff designated the responsibility for supervising loading / unloading will be adequately trained in the procedures and use of spill kits.

Spill kits will be checked as part of the site inspection for need of replenishment. All staff designated the responsibility for supervising unloading will be adequately trained in the Delivery and Collection Procedure and the Spill Procedure.

1.8 Litter

Site inspections will be undertaken to ensure that there is no build-up of litter within site yards, against site fences and on-site roads. Where significant amounts of litter are encountered, this will be reported using the incident and corrective action structure and litter picked up and placed in the appropriate waste vessels.

3. Associated EMS Documents

The EMS documents listed below are those which assist in the implementation of the infrastructure monitoring programme:

- Waste Acceptance Procedure
- Waste Storage Procedure
- Spill Procedure
- Hazardous Substance Storage Procedure
- Incident and Corrective Action Report Forms
- Emergency Contact List
- Fire Control Procedure
- Delivery and Collection Procedure
- Complaints Procedure
- Daily Walk Round Inspection

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Document Reference: EM 01-002
Issue Number: 2
Issue Date: 28.07.22

- Underground Vessel Inspection Form
- Tank and Bund Schedule
- Weekly Walk Round Inspection
- Inspection Schedule
- Waste Vessel Schedule


1. Corrective Action Structure

Any faults or deficiencies encountered by the monitoring programme will be detailed within the Incident Report Form and the Corrective Action Report Form. These documents will instigate the appropriate level of management commitment to ensure any repairs are commissioned and undertaken. A review of the corrective action will be included to ensure satisfactory completion.

Audits and review of the monitoring programme may lead to revision of the monitoring plan in terms of frequency and the level of detail required to ensure the programme remains fit for purpose. Infrastructure monitoring records will be kept for the Environmental Permit lifetime.

2. Training

Personnel responsible for the inspection, testing and maintenance of pollution prevention infrastructure are to be trained to an appropriate level to ensure compliance with the infrastructure monitoring programme. This will be detailed in the Training Records.

	ACCIDENT MANAGEMENT PLAN	
Document Reference: EM 01-003	Issue Number: 2	Issue Date: 28.07.22

1. Purpose

The Accident Management Plan (AMP):

- Outlines all the identified potential pollution accident scenarios;
- Evaluates the risk associated with the scenario;
- Details the likely consequence should the accident occur;
- Lists safeguards that will be implemented to prevent the accident occurring or limit the consequence should it occur;
- Where necessary outlines further requirements to limit the consequence.

The Accident Management Plan documents will be reviewed on a four yearly basis or following an environmental emergency / incident or serious near miss and updated as necessary. In the event of any major infrastructure changes undertaken on site, the Accident Management Plan will be reviewed and updated as necessary.

2. Reference Documents / Associated Procedures

The following procedures form part of the EMS at the facility and are related to accident and emergency situations:

- Emergency Procedure;
- Incident and Near Miss Procedure;
- Delivery Procedure;
- Spill Procedure;
- Fire Control Procedure;
- Waste Acceptance Procedure;
- Planned Preventative Maintenance Procedures.

3. Definitions

i. Emergency

For this facility it has been determined that an emergency situation in relation to environmental considerations is constituted by the escape off site of materials potentially hazardous to health and / or the environment. This is combined with the potential of the material to be able to impact upon an identified sensitive receptor. Furthermore, where the escape of material on site is potentially hazardous to human health, this will constitute an emergency situation regardless of whether it has escaped off site or not.

ii. Incident

In contrast, where materials potentially hazardous to the environment are contained on site, this will be classed as an incident. Where the escape of material on site is potentially hazardous to human health, this will constitute an emergency situation regardless of whether it has escaped off site or not.

iii. Near Miss

Any occurrence or potential occurrence identified that could lead to an emergency or incident occurring.

iv. Operational Conditions

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The emergency situations have been assessed related to normal and abnormal conditions.

v. Normal

Routine activity on site.

vi. Abnormal

Planned deviation from normal operating procedures.

4. Methodology

The risk assessment has been undertaken for each potential emergency scenario activity identified in Table 1 below. The risk classification assigned has been evaluated by assessing the likelihood of an incident occurring and the severity of impact should it occur.

Probability of an event occurring		
Score	Description	Definition
1	Very Low	Extremely unlikely to occur (<1 per 10 years)
2	Low	Unlikely to occur (<1 per year)
3	Moderate	Could occur (1 per year)
4	High	Could occur frequently (>1 per year)
5	Very High	Could occur continuously

Severity of impact should the event occur		
Score	Description	Definition
1	Very Low	Negligible impact
2	Low	Minor impact (contained in localised area on site & recoverable)
3	Moderate	Medium impact (contained within site boundary & recoverable)
4	High	Major impact (spread off site &/or difficult to recover)
5	Very High	Major impact (spread off-site & long term/permanent damage)

5. Risk Assessment:

The Probability (P) and Severity (S) scores assigned to each item are then multiplied together to provide a total risk assessment score (R):

$$P \times S = R$$

Scores are considered to be high or low risk using the following risk classification:

< 10 – Low Risk

≥10 – High Risk

Table 1. Accident Risk Assessment

<i>Identification of Potential Risks ¹</i>				<i>Risk Management Controls</i>		Risk Assessment		
Source of Risk	Hazardous Event	Pollution Pathways	Receptors	Physical controls	Management system controls ²	P	S	R
Waste Delivery <u>Scope:</u> Delivery directly to the Top and Bottom Sites and the transfer of waste from the Top Site to the Bottom Site.	Spillage of waste from incoming vehicles	Materials enter land, process drains or surface waters.	<ul style="list-style-type: none"> Land; Surface water; Atmosphere. 	Sheeting / containment of vehicles where possible. Oil and solvent laden waste streams delivered to site in sealed containers. Hard standing on Top Site delivery and hard core on all Bottom Site Delivery routes. Daily inspections for litter accumulation by site staff and operatives. Due to the nature of the waste streams at the Bottom Site, any spillage of waste will have minimal potential to impact on land, controlled waters and atmosphere.	The following Management System Controls will be in place to control the environmental risk from spillages of wastes at the facility during deliveries: <ul style="list-style-type: none"> Waste Acceptance Procedures; Spill Procedures; Site Inspections; Fugitive Emissions Monitoring. 	2	3	6
	Odours from incoming waste vehicles to the	Release of odours into	<ul style="list-style-type: none"> Atmosphere 	Sheeting / containment of vehicles where possible.	The following Management System Controls will be in place to control the environmental risk of odour from	2	3	6

<i>Identification of Potential Risks¹</i>				<i>Risk Management Controls</i>		Risk Assessment		
Source of Risk	Hazardous Event	Pollution Pathways	Receptors	Physical controls	Management system controls²	P	S	R
	Top Site.	atmosphere.		Oil and solvent laden waste streams delivered to site in sealed containers. As far as practical vehicles will be directed inside the building whilst waiting to tip.	incoming materials: <ul style="list-style-type: none"> Waste Acceptance Procedures; Communication and Complaints Systems; Odour Monitoring. 			
	Odours from incoming waste vehicles to the Bottom Site.	Release of odours into atmosphere.	<ul style="list-style-type: none"> Atmosphere 	As far as practical vehicles will be directed inside the building at the Top Site whilst waiting to tip. Due to the nature of the waste streams accepted at the Bottom Site the waste will have minimal potential to generate odours.	The following Management System Controls will be in place to control the environmental risk of odour from incoming materials: <ul style="list-style-type: none"> Waste Acceptance Procedures; Communication and Complaints Systems; Odour Monitoring. 	2	2	4
	Dust from incoming waste vehicles.	Release of dust into atmosphere.	<ul style="list-style-type: none"> Atmosphere 	Sheeting / containment of vehicles where possible. Scheduled deliveries of asbestos containing materials, delivered to site in covered vehicles.	The following Management System Controls will be in place to control the environmental risk of dust from incoming vehicles: <ul style="list-style-type: none"> Fugitive Emissions Monitoring. 	2	3	6

Table 1. Accident Risk Assessment								
<i>Identification of Potential Risks ¹</i>				<i>Risk Management Controls</i>		<i>Risk Assessment</i>		
Source of Risk	Hazardous Event	Pollution Pathways	Receptors	Physical controls	Management system controls ²	P	S	R
				Top Site covered by hard standing on all delivery vehicle routes. Hard core on all Bottom Site Delivery routes. Regular site road sweeping where necessary. Road sweeper fitted with water spray system. Site speed limit.				6
Waste Collection <u>Scope:</u> Collection directly from the Top and Bottom Site of bulked / recycled waste	Spillage of waste from collection vehicles	Materials enter land, process drains or surface waters.	<ul style="list-style-type: none"> • Land; • Surface water; • Atmosphere. 	Sheeting / containment of vehicles where possible. Hazardous waste collected in enclosed sealed containers where possible. Daily inspections for litter accumulation by site staff and operatives. Hard standing across the Top Site for all operational areas.	The following Management System Controls will be in place to control the environmental risk from waste spillages at the facility during collection: <ul style="list-style-type: none"> • Waste Dispatch Procedures; • Spill Procedures; • Site Inspections; • Fugitive Emissions Monitoring. 	2	3	6

<i>Identification of Potential Risks¹</i>				<i>Risk Management Controls</i>		<i>Risk Assessment</i>		
Source of Risk	Hazardous Event	Pollution Pathways	Receptors	Physical controls	Management system controls²	P	S	R
streams.				Hard core on all Bottom Site Delivery routes. Due to the nature of the waste streams at the Bottom Site any spillage of waste will have minimal potential to impact on land, controlled waters and atmosphere.				6
	Odours from Top Site waste collection vehicles.	Release of odours into atmosphere.	<ul style="list-style-type: none"> Atmosphere 	Collection vehicles will be covered or enclosed where possible. Oil and solvent laden waste streams collected from site in sealed containers.	The following Management System Controls will be in place to control the environmental risk of odour from outgoing materials: <ul style="list-style-type: none"> Communication and Complaints Systems; Odour Monitoring. 	2	3	6
	Odours from Bottom Site waste collection vehicles.	Release of odours into atmosphere.	<ul style="list-style-type: none"> Atmosphere 	Due to the nature of the waste streams accepted at the Bottom Site the waste will have minimal potential to generate odours.	The following Management System Controls will be in place to control the environmental risk of odour from outgoing materials: <ul style="list-style-type: none"> Communication and Complaints 	2	2	4

Table 1. Accident Risk Assessment								
<i>Identification of Potential Risks</i> ¹				<i>Risk Management Controls</i>		<i>Risk Assessment</i>		
Source of Risk	Hazardous Event	Pollution Pathways	Receptors	Physical controls	Management system controls ²	P	S	R
					Systems; • Odour Monitoring.			6
	Dust from outgoing waste vehicles.	Release of dust into atmosphere.	• Atmosphere	Collection vehicles will be covered or enclosed where possible. Asbestos containing materials dispatched from site in covered vehicles. Top Site covered by hard standing on all delivery vehicle routes. Hard core on all Bottom Site Delivery routes. Regular site road sweeping where necessary. Road sweeper fitted with water spray system. Site speed limit.	The following Management System Controls will be in place to control the environmental risk of dust from outgoing vehicles: • Fugitive Emission Monitoring.	2	3	6
Waste	Odours from stored waste	Release of odours into	• Atmosphere	Odorous wastes stored	The following Management System Controls will be in place to control the	2	3	6

<i>Identification of Potential Risks¹</i>				<i>Risk Management Controls</i>		<i>Risk Assessment</i>		
Source of Risk	Hazardous Event	Pollution Pathways	Receptors	Physical controls	Management system controls²	P	S	R
Storage <u>Scope:</u> Storage of waste at the Top and Bottom Site prior to and following sorting.	materials at the Top Site.	atmosphere.		internally; Storage of putrescible / food waste will be minimised.	environmental risk of odour from waste storage: <ul style="list-style-type: none"> Waste Storage Procedures; Communication and Complaints Systems; Odour Monitoring. 			
	Odours from stored waste materials at the Bottom Site.	Release of odours into atmosphere.	<ul style="list-style-type: none"> Atmosphere 	Nature of the waste streams stored at the Bottom site have minimal potential to generate odours.	The following Management System Controls will be in place to control the environmental risk of odour from waste storage: <ul style="list-style-type: none"> Waste Storage Procedures; Communication and Complaints Systems; Odour Monitoring. 	2	2	4
	Dust from stored waste materials at the Top Site.	Release of dust into atmosphere.	<ul style="list-style-type: none"> Atmosphere 	Asbestos stored in a sealed container. Waste stored in dedicated storage areas. Regular site road sweeping	The following Management System Controls will be in place to control the environmental risk of dust emissions from the storage of waste on-site: <ul style="list-style-type: none"> Fugitive Emissions Monitoring. 	1	2	2

<i>Identification of Potential Risks¹</i>				<i>Risk Management Controls</i>		<i>Risk Assessment</i>		
Source of Risk	Hazardous Event	Pollution Pathways	Receptors	Physical controls	Management system controls²	P	S	R
				where necessary. Road sweeper fitted with water spray system.				
	Dust from stored waste materials at the Bottom Site.	Release of dust into atmosphere.	<ul style="list-style-type: none"> Atmosphere 	Waste stored in dedicated storage areas. Regular site road sweeping where necessary. Road sweeper fitted with water spray system.	The following Management System Controls will be in place to control the environmental risk of dust emissions from the storage of waste on-site: <ul style="list-style-type: none"> Fugitive Emissions Monitoring. 	2	3	6
	Stored waste catching fire.	Releases to atmosphere.	<ul style="list-style-type: none"> Atmosphere 	Waste procedures in place to ensure stock piles are turned over frequently. Fire fighting equipment kept on site.	The following Environmental Management System documents and procedures are in place to control environmental risk from fires at site: <ul style="list-style-type: none"> Fugitive Emissions Monitoring; Fire Control Procedure Planned Preventative Maintenance. 	1	5	5
	Escape of Fire Waters from Site During Fire	Materials enter land, process drains	<ul style="list-style-type: none"> Land; Surface water; 	Hard standing across the Top Site for all operational areas. All external process drains at	The following Environmental Management System documents and procedures are in place to control	1	5	5

<i>Identification of Potential Risks¹</i>				<i>Risk Management Controls</i>		Risk Assessment		
Source of Risk	Hazardous Event	Pollution Pathways	Receptors	Physical controls	Management system controls²	P	S	R
	Fighting.	or surface waters.	<ul style="list-style-type: none"> Atmosphere. 	the Top Site pass through an interceptor before discharge. Internal process drains content collected by a storage tank, before collection and disposal at a suitably licensed facility. Green waste and metals to be stored on sealed concrete draining to sumps at the Bottom Site. Fires will be managed in such a way to minimise use of water to control fires where practicable.	environmental risk from fire waters: <ul style="list-style-type: none"> Fugitive Emissions Monitoring; Fire Control Procedure; Planned Preventative Maintenance. 			4
Fuels <u>Scope:</u> Fuels stored at the Top Site.	Spill during delivery of fuels to site.	Materials enter land, process drains or surface waters.	<ul style="list-style-type: none"> Land; Surface water; Atmosphere. 	Hard standing across the site for all operational areas. All potentially hazardous materials held within dedicated secondary containment systems.	The following Environmental Management System documents and procedures will be in place to control the environmental risk from the spill of fuels during delivery to site: <ul style="list-style-type: none"> Delivery Procedures; Spill Procedures; 	2	2	4

<i>Identification of Potential Risks¹</i>				<i>Risk Management Controls</i>		Risk Assessment		
Source of Risk	Hazardous Event	Pollution Pathways	Receptors	Physical controls	Management system controls²	P	S	R
					<ul style="list-style-type: none"> Hazardous Substance Storage Procedures; Fugitive Emissions Monitoring. 			
	Failure of fuel storage containment.	Materials enter land, process drains or surface waters.	<ul style="list-style-type: none"> Land; Surface water; Atmosphere. 	Hard standing across the site for all operational areas. All potentially hazardous materials held within dedicated secondary containment systems.	The following Management System Controls will be in place to control the environmental risk from the failure of fuel storage vessels at the facility: <ul style="list-style-type: none"> Spill Procedures; Hazardous Substance Storage Procedures; Fugitive Emissions Monitoring. 	1	3	3
	Fuel delivery to Vehicle Spill	Materials enter land, process or surface water drains.	<ul style="list-style-type: none"> Land; Surface water; Atmosphere. 	Hard standing across the site for all operational areas. All potentially hazardous materials held within dedicated secondary containment systems.	The following Management System Controls will be in place to control the environmental risk from the spillage of fuel during supply to the vehicles at the facility: <ul style="list-style-type: none"> Spill Procedures; Fugitive Emissions Monitoring. 	1	3	3

<i>Identification of Potential Risks ¹</i>				<i>Risk Management Controls</i>		Risk Assessment		
Source of Risk	Hazardous Event	Pollution Pathways	Receptors	Physical controls	Management system controls ²	P	S	R
	Failure of bailer and Trommel fuel storage containment.	Materials enter land, process drains or surface waters.	<ul style="list-style-type: none"> Land; Surface water; Atmosphere. 	Hard standing across the site for all operational areas.	The following Management System Controls will be in place to control the environmental risk from the failure of fuel storage vessels at the facility: <ul style="list-style-type: none"> Spill Procedures; Hazardous Substance Storage Procedures; Fugitive Emissions Monitoring. 	1	4	4
	Fuel delivery to equipment spill.	Materials enter land, process drains or surface waters.	<ul style="list-style-type: none"> Land; Surface water; Atmosphere. 	Hard standing across the site for all operational areas. Fuel tanks fitted with drip trays.	The following Management System Controls will be in place to control the environmental risk from the spillage of fuel during supply to the process machinery at the facility: <ul style="list-style-type: none"> Spill Procedures; Hazardous Substance Storage Procedures; Fugitive Emissions Monitoring. 	1	3	3
Cleaning Chemicals	Spill During Delivery.	Materials enter land,	<ul style="list-style-type: none"> Land; 	Hard standing across the site for all operational areas.	The following Environmental Management System documents and	2	2	4

<i>Identification of Potential Risks ¹</i>				<i>Risk Management Controls</i>		Risk Assessment		
Source of Risk	Hazardous Event	Pollution Pathways	Receptors	Physical controls	Management system controls ²	P	S	R
<u>Scope:</u> Chemicals stored and used on the Top Site.		process drains or surface waters.	<ul style="list-style-type: none"> • Surface water; • Atmosphere. 	All potentially hazardous materials held within dedicated secondary containment systems.	procedures are in place to control the environmental risk from the spill of cleaning chemicals during delivery: <ul style="list-style-type: none"> • Delivery Procedures; • Spill Procedures; • Hazardous Substance Storage Procedures; • Fugitive Emissions Monitoring. 			
	Failure of Cleaning Chemical Containment	Materials enter land, process drains or surface waters.	<ul style="list-style-type: none"> • Land; • Surface water; • Atmosphere. 	Hard standing across the site for all operational areas. All potentially hazardous materials held within dedicated secondary containment systems.	The following Environmental Management System documents and procedures are in place to control the environmental risk from the failure of cleaning chemical containment: <ul style="list-style-type: none"> • Spill Procedure; • Hazardous Substance Storage Procedures; • Fugitive Emissions Monitoring. 	1	3	3
	Manual Handling Spill	Materials enter land,	<ul style="list-style-type: none"> • Land; 	Hard standing across the site for all operational areas.	The following Environmental Management System documents and	3	2	6

Table 1. Accident Risk Assessment								
Identification of Potential Risks ¹				Risk Management Controls		Risk Assessment		
Source of Risk	Hazardous Event	Pollution Pathways	Receptors	Physical controls	Management system controls ²	P	S	R
		process drains or surface waters.	<ul style="list-style-type: none"> • Surface water; • Atmosphere. 	All potentially hazardous materials held within dedicated secondary containment systems.	procedures are in place to control the environmental risk from the spill of cleaning chemicals during manual handling: <ul style="list-style-type: none"> • Spill Procedure; • Hazardous Substance Storage Procedures; • Fugitive Emissions Monitoring. 			
Site Process Drainage System <u>Scope:</u> Site drainage systems provided for the Top Site and for the storage of green waste and metals at the Bottom	Failure of the Drainage System	Materials enter land, process drains or surface waters.	<ul style="list-style-type: none"> • Land; • Surface water; • Atmosphere. 	The drainage system is cleaned and inspected on a regular basis.	The following Environmental Management System documents and procedures are in place to control environmental risk from failure of the site process drainage infrastructure: <ul style="list-style-type: none"> • Fugitive Emissions Monitoring; • Planned Preventative Maintenance; • Spill Procedures. 	1	4	4
	Blockage of the Drainage System	Materials enter land, process drains or surface	<ul style="list-style-type: none"> • Land; • Surface water; 	The drainage system is cleaned and inspected on a regular basis.	The following Environmental Management System documents and procedures are in place to control environmental risk from blockages of the	2	3	6

Table 1. Accident Risk Assessment								
<i>Identification of Potential Risks</i> ¹				<i>Risk Management Controls</i>			<i>Risk Assessment</i>	
Source of Risk	Hazardous Event	Pollution Pathways	Receptors	Physical controls	Management system controls ²	P	S	R
Site.		waters.	<ul style="list-style-type: none"> Atmosphere. 		site process drainage infrastructure: <ul style="list-style-type: none"> Fugitive Emissions Monitoring; Planned Preventative Maintenance; Spill Procedures. 			
	Failure of Drainage Collection Sump.	Materials enter land, process drains or surface waters.	<ul style="list-style-type: none"> Land; Surface water; Atmosphere. 	The drainage system is cleaned and inspected on a regular basis.	The following Environmental Management System documents and procedures are in place to control environmental risk from failure of the site process drainage infrastructure: <ul style="list-style-type: none"> Fugitive Emissions Monitoring; Planned Preventative Maintenance; Spill Procedures. 	1	4	4
Notes: P: Probability S: Severity (Impact / Consequence) R: Risk Level 1: All contingency planning requirements are dealt with in the 'Emergency' and the 'Incident and Near Miss' Procedures; 2: No account of Health and Safety risk assessments (human receptors) have been considered – these have been dealt with under separate cover.								

1. Introduction

Site has a Planned Preventative Maintenance System in place which is implemented as part of the EMS. This is an electronic system for logging all planned and un-planned (breakdown and emergency) maintenance. This provides the following control mechanisms:

- All key plant are subject to routine preventative maintenance (reducing plant downtime, increasing productivity and preventing potential environmental impacts);
- All work performed by the site engineers and contracted specialists (planned and un-planned) is recorded and data can be used to identify key areas of concern within the plant;
- The system can be cross-referenced to the corrective action forms to ensure all corrective actions have been implemented.

Static items, such as tanks, secondary containment and drainage systems are listed and dealt with in as part of the Fugitive Emissions Monitoring Programme.

A risk assessment has been undertaken for all other plant in Table 1 below. The risk classification assigned has been evaluated by assessing the likelihood of plant failure occurring and the severity of impact should it occur. The planned preventative maintenance employed is then detailed in the final column in Table 1. As a minimum standard, those items of plant deemed to be critical will be subject to a planned preventative maintenance regime as outlined in the Planned Preventative Maintenance Schedule

2. Methodology:

The equipment included within this review has been determined by the potential for environmental impact to occur should the item(s) fail. The following impacts have been considered:

- Odour;
- Noise;
- Releases to air;
- Releases to land;
- Releases to water.

Probability of plant failure occurring:

Score	Description	Definition
1	Very Low	Extremely unlikely to occur (<1 per 10 years)
2	Low	Unlikely to occur (<1 per year)
3	Moderate	Could occur (1 per year)
4	High	Could occur frequently (>1 per year)
5	Very High	Could occur continuously

Severity of impact should the event occur:

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Ellgia Ltd		Stephen Kent

Score	Description	Definition
1	Very low	Negligible impact
2	Low	Minor impact (contained in localised area on site & recoverable)
3	Moderate	Medium impact (contained within site boundary & recoverable)
4	High	Major impact (spread off site &/or difficult to recover)
5	Very high	Major impact (spread off-site & long term/permanent damage)

3. Risk Assessment:

The Probability (P) and Severity (S) scores assigned to each item are then multiplied together to provide a total risk assessment score (R):

$$P \times S = R$$

Scores are considered to be high or low risk using the following risk classification:

< 10 – Low Risk

≥ 10 – High Risk

All staff working on or supervising work on plant that are identified with a high risk of having an impact on the environment as a result of the assessment, will receive additional training in order to prevent incidents or mitigate them should they occur.

4. Documentation

Manuals for all key items of operating plant are held in the Site Office. These manuals have been supplied by the manufacturers and their maintenance regimes are adapted to be implemented on site based on operating experience.

5. Review

A review of this document is to be undertaken on a regular basis in line with other EMS documents. The frequency of scheduled maintenance will be regularly reviewed by assessing maintenance and repair records to evaluate areas for improvement. If necessary as a result of the review the relevant plans and procedures are to be updated accordingly.

Table 1. Assessment of Plant Failure, Potential Impact on the Environment and Planned Preventative Maintenance.

<i>Identification of Potential Risks</i>				<i>Initial Assessment of the Risks</i>			<i>Further Risk Management</i>				
Source of Risk	Hazardous Event	Pollution Pathways	Receptors ¹	Current Risk Management Controls	Initial Risk Assessment			Planned Preventative Maintenance To Reduce Unacceptable Risks ¹	Residual Risk		
					P	S	R		P	S	R
<u>Site Vehicles:</u> Site vehicles operating at the Top and Bottom Sites.	Vehicles operating out of specification.	Loss of noise control.	• Atmosphere.	Vehicles serviced by Site Engineers. Noise Assessment Procedure.	3	4	12	The following planned preventative maintenance measures are in place to control the environmental risk from site vehicles operating out of specification: <ul style="list-style-type: none"> Planned preventative maintenance scheduling to ensure all working parts are fitted correctly to minimise noise and vibration levels. Maintenance will also cover noise abatement equipment fitted to vehicles such as exhaust silencers. Incident and corrective action reporting structure detailing any required maintenance, instigating commencement and recording completion. 	2	3	6
<u>Cleaning Systems:</u> Cleaning	Failure of Vehicle Wash System	Loss of Odour Control	• Atmosphere.	Odour Assessment Procedure	3	4	12	The following planned preventative maintenance measures are in place to control the environmental risk from vehicle wash system failure within the	2	4	8

Table 1. Assessment of Plant Failure, Potential Impact on the Environment and Planned Preventative Maintenance.

<i>Identification of Potential Risks</i>				<i>Initial Assessment of the Risks</i>			<i>Further Risk Management</i>				
Source of Risk	Hazardous Event	Pollution Pathways	Receptors ¹	Current Risk Management Controls	Initial Risk Assessment			Planned Preventative Maintenance To Reduce Unacceptable Risks ¹	Residual Risk		
					P	S	R		P	S	R
systems in place for vehicle wash down.							8	cleaning system infrastructure: <ul style="list-style-type: none"> Planned preventative maintenance scheduling to ensure wash down equipment such as pressure washers remain fit for purpose; Incident and corrective action reporting structure detailing any required maintenance, instigating commencement and recording completion. 			4
<u>Waste Treatment Systems</u>	Failure of the Trommel screen.	Wastes sent off site outside of customer requirements.	<ul style="list-style-type: none"> Land. 	Waste Acceptance and Dispatch Procedures.	2	4	8	The following planned preventative maintenance measures are in place to control the environmental risk from failure of the Trommel Screen: <ul style="list-style-type: none"> Planned preventative maintenance scheduling to ensure screens remain in place and operate as per design; Incident and corrective action reporting structure detailing any required maintenance, instigating commencement and recording 	1	4	4

Table 1. Assessment of Plant Failure, Potential Impact on the Environment and Planned Preventative Maintenance.

Identification of Potential Risks				Initial Assessment of the Risks			Further Risk Management				
Source of Risk	Hazardous Event	Pollution Pathways	Receptors ¹	Current Risk Management Controls	Initial Risk Assessment			Planned Preventative Maintenance To Reduce Unacceptable Risks ¹	Residual Risk		
					P	S	R		P	S	R
								completion.			
	Trommel screen operating out of specification.	Loss of noise control.	<ul style="list-style-type: none"> Atmosphere. 	Trommel serviced by Site Engineers. Trommel operates within a building. Noise Assessment Procedure.	3	4	12	The following planned preventative maintenance measures are in place to control the environmental risk from the Trommel Screen operating out of specification: <ul style="list-style-type: none"> Planned preventative maintenance scheduling to ensure all working parts are fitted correctly to minimise noise and vibration levels; Incident and corrective action reporting structure detailing any required maintenance, instigating commencement and recording completion. 	2	3	6
	Shredder Failure	Wastes sent off site outside of customer requirements.	Land.	Waste Acceptance and Dispatch Procedures.	2	4	8	The following planned preventative maintenance measures are in place to control the environmental risk from failure of a shredder: <ul style="list-style-type: none"> Planned preventative maintenance scheduling to ensure shredders 	1	4	4

Table 1. Assessment of Plant Failure, Potential Impact on the Environment and Planned Preventative Maintenance.

<i>Identification of Potential Risks</i>				<i>Initial Assessment of the Risks</i>			<i>Further Risk Management</i>					
Source Risk	of	Hazardous Event	Pollution Pathways	Receptors ¹	Current Risk Management Controls	Initial Risk Assessment			Planned Preventative Maintenance To Reduce Unacceptable Risks ¹	Residual Risk		
						P	S	R		P	S	R
									operate as per design; Incident and corrective action reporting structure detailing any required maintenance, instigating commencement and recording completion.			
		Shredder operating out of specification	Wastes sent off site outside of customer requirements.	Land.	Waste Acceptance and Dispatch Procedures.	2	4	8	The following planned preventative maintenance measures are in place to control the environmental risk from failure of a shredder operating out of specification: <ul style="list-style-type: none"> Planned preventative maintenance scheduling to ensure screens remain in place and operate as per design. Incident and corrective action reporting structure detailing any required maintenance, instigating commencement and recording completion.	1	4	4
		Biomass Plant operating out of specification	Wastes sent off site outside of customer	Land.	Waste Acceptance and Dispatch	2	4	8	The following planned preventative maintenance measures are in place to control the environmental risk from failure of the biomass plant operating out	1	4	4

Table 1. Assessment of Plant Failure, Potential Impact on the Environment and Planned Preventative Maintenance.

<i>Identification of Potential Risks</i>				<i>Initial Assessment of the Risks</i>			<i>Further Risk Management</i>				
Source of Risk	Hazardous Event	Pollution Pathways	Receptors ¹	Current Risk Management Controls	Initial Risk Assessment			Planned Preventative Maintenance To Reduce Unacceptable Risks ¹	Residual Risk		
					P	S	R		P	S	R
		requirements.		Procedures.				of specification: <ul style="list-style-type: none"> Planned preventative maintenance scheduling to ensure screens remain in place and operate as per design. Incident and corrective action reporting structure detailing any required maintenance, instigating commencement, and recording completion.			

Notes:

P: Probability

S: Severity (Impact / Consequence)

R: Risk Level

1: No account of Health and Safety risk assessments (human receptors) have been considered.

Introduction

The de-commissioning plan incorporates a Closure Plan and the Site Condition Report.

The Closure Plan outlines the process by which the operations (whole or part of) will be ceased on site and plant decommissioning achieved.

The ongoing Site Condition Report details:

- How information will be collated;
- The data that will be collected, over the operational period.

This will ensure that sufficient data and knowledge of the process and subsequent operational variations is readily available. This will allow the installation to complete a site surrender report to the satisfaction of the regulator, once the decision to decommission the whole, or part, of the permitted operations has been made.

1. Closure Plan

The closure plan on complete cessation of activities will involve:

i. Removal and Disposal of Raw Materials and Products

There will be a general rundown in the site’s throughput as it prepares for closure. In essence this will ensure that there is not a stock of raw material – waste – remaining on site at the time of closure. At the same time there will be a removal of products from storage for onward sale.

At the time of closure residual stocks of raw materials and products will be assessed. Where possible these materials will be sent to other recovery / disposal plants in line with the necessary regulations.

ii. Disposal of Ancillary Materials

Once the decision has been made for closure the quantities of ancillary materials, e.g. cleaning chemicals and fuels, held on site will be gradually reduced. In essence material will be used from stock and the bare minimum of fresh material will be ordered and delivered. The intention will be to have the on-site stocks as close to nil as possible at closure

At the time of closure residual stocks of ancillary materials will be assessed. Where possible these materials will be sold to other processing plants or will be returned to the suppliers for re-use. Any material still remaining will be disposed of to suitable treatment or disposal facilities, e.g. landfill sites.

iii. Dismantling of Process Equipment

Unless the site is to be sold “as is” there will be a need to remove processing equipment. Equipment will first be thoroughly cleaned to minimise contamination and possible health hazards. If possible equipment will be sold for re-use, either directly to other operators or to second hand equipment dealers. Any equipment remaining will either be sold for scrap or will be disposed of to suitable licensed facilities, e.g. landfill sites. In any such disposal the site will take full cognisance of applicable disposal legislation

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Abatement systems will be kept operational to deal with the stock reduction, cleaning and dismantling process to ensure, as far as possible, that no adverse environmental impacts occur during the de-commissioning period. Once the process facilities are de-commissioned, the abatement systems will be dismantled.

iv. Confirmatory Analysis of Ground Condition

Following completion of the above steps the ground condition will be assessed to demonstrate that there has been no increase in ground pollution throughout the life of the permit.

v. Surrender of the Environmental Permit

Following completion of the above steps the Environmental Permit will be formally surrendered in accordance with prevailing legislation at the time.

vi. Re-use or Demolition of Buildings and Site

Once the Environmental Permit has been surrendered the building can be re-used, with demolition of buildings if necessary.

2. Site Condition Report

The steps described above will be supported by Site Condition Report Records that will be maintained at the site. The purpose of the collection of these records is to facilitate the on going collation of all SCR data, following the H5 guidance and template. The Site Condition Report Records will contain the following elements:


i. Reference Documents

The following documents will be held with the Site Condition Report Records as a minimum.

Title
Core Reference Documents
Environmental Permit (Top Site and Bottom Site)
Waste Management Licence Modification (Top Site)
Environmental Permit Variation (Top Site)
Site Condition Reports Guidance and Templates
Bottom Site Application Site Report (Site Condition Report)
Fugitive Emissions Monitoring Programme
Reference Documents Updated and Added on an Annual Basis or Following Review*
Infrastructure Monitoring Programme Records.
Waste Schedule
Infrastructure Monitoring Schedule
Copies of additional data on the condition of the site that may be developed over the life of the permit, e.g. any ground investigation work.
Details of any changes to the permitted operations and the extent of the facility. In particular any Permit variations and updates to site reports will be filed.
Details of any spillages or releases to the ground that may have added to the loadings of potential pollutants.
Details of any site clearance or clean-up that has been undertaken – e.g. removal of material during foundation excavations.
Operational Changes
Documents Submitted to the Regulator at Permit Surrender
Decommissioning Plan
Site Condition Report Records
Notes: * All guidance documents are to be reviewed on an annual basis during the EMS Audit.

a. Core Reference Documents

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	DECOMMISSIONING PLAN	
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The following documents will be stored at permit issue with the Site Condition Report Records.

H5- Site Condition Report Guidance and Templates

A copy of the guidance and template application produced by the Environment Agency providing guidance of the records to be kept during the operational and surrender stages of the Environmental Permit. This is to ensure that updates and developments in the guidance are properly reflected in the plan. Checking for updates in guidance and updating the surrender plan to reflect these will be a part of the de-commissioning plan reviews.

Permits

Top Site

- The Environmental Permit Reference: 43465 issued on 26/05/2000;
- The Environmental Permit Variation Reference: 43465 Modification issued on 11/12/2003;
- The Environmental Permit Variation Reference: EPR/LP3990CY/V003 issued on 04/03/2011.

Bottom Site

The Environmental Permit Reference: 43094 issued on 23/03/1991;

Application Site Report

The Application Site Report (ASR) submitted as part of the initial Permit Application for the Bottom Site. Within the ASR, records of the site and surrounding areas were reviewed along with operational site records, in order:

- To describe the condition of the site and environmental setting;
- To identify the potential for any substance to impact on or under the land;
- Pollution prevention measures have been identified and an assessment of pollution potential to land was undertaken.

It has been established that there is little likelihood of land pollution occurring during the permit lifetime at the installation, as materials will be used and stored in line with Best Available Technique and an Environmental Management System is being implemented, incorporating the Infrastructure Monitoring Programme.

Waste Schedule

A Waste Schedule will be kept and updated on an annual basis along with the associated legal documentation. This will identify all the waste produced at the installation that could provide a risk to the environment. This information will outline the following:

Waste Characteristics	Site Specific Characteristics
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Waste Stream; EWC Code; Origin.	Handling Arrangements; Storage Vessel and Capacity; Storage Location and Period; Annual Tonnage; Treatment Recovery or Disposal Method.
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b. Reference Documents Updated and Added on an Annual Basis or Following Review

Guidance Documents

All guidance documents will be reviewed and updated where necessary on an annual basis as part of the Environmental Management System Audit.

Spillages

Details of any spillages or releases to the ground that may have added to the loadings of potential pollutants will be kept. As a minimum the records will include the type of substances involved, the date of release, an estimate of the amount of release, the location of the release, a description of any clean-up and an assessment of the potential contamination caused by the release;

Remediation

Details of any site clearance or clean-up that has been undertaken will be kept – e.g. the removal of material during foundation excavations. As a minimum the records will include the date of the operations, the nature of the operations and the location and extent of the operations. Confirmatory analytical testing of underlying ground/groundwater will be undertaken, where relevant and records provided.

Operational Changes

Details of any changes to the permitted operations and the extent of the facility will be noted. In particular any updates to the Site Condition Report will be filed.

Records

All records relating to the Permit, Closure Plan and Site Condition Report will be held in an electronic archive system by the Company for the lifetime of the Permit.

ii. Documents Submitted to the Regulator at Permit Surrender

All documents associated with the Decommissioning Plan and Site Condition Report Records will be submitted to the regulator to demonstrate that no adverse effect to the environment has occurred during the permit life time or if adverse impacts have occurred these have been remediated.

iii. Document Review

- The de-commissioning plan will be reviewed and updated accordingly at the following intervals:
- Four yearly;
- Where substantial changes to site infrastructure occurs;
- Where a Permit variation occurs.

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1. Purpose:

- I. Identify potential for and respond to environmental emergency situations;
- II. Prevent and mitigate the environmental impacts associated with emergency situations;
- III. Review and revise procedures where necessary and especially after an emergency situation;
- IV. Define how periodic testing of emergency procedures will be carried out;
- V. Refer to existing procedures that should be used in emergency situations.

2. Definitions:

What comprises an “Emergency Situation”?

For this facility it has been determined that an emergency situation in relation to environmental considerations is constituted by the escape off site of materials potentially hazardous to health and / or the environment. This is combined with the potential of the material to be able to impact upon an identified sensitive receptor. Furthermore, where the escape of material on site is potentially hazardous to human health, this will constitute an emergency situation regardless of whether it has escaped off site or not.

What comprises an “Incident Situation”?

In contrast, where materials potentially hazardous to the environment are contained on site, this will be classed as an incident.

What comprises a “Near Miss”?

For this facility it has been determined that an incident situation in relation to environmental considerations is constituted following an accident where materials potentially hazardous to the environment are contained on site. Where the escape of material on site is potentially hazardous to human health, this will constitute an emergency situation regardless of whether it has escaped off site or not.

3. Procedure:

In the event of an incident or near miss the Incident and Near Miss Procedure should be followed.

Emergencies Involving Hazardous Materials On-site

In the event of an emergency situation involving the discharge of significant quantities of hazardous materials into the environment:

- I. Where safe to do so wearing appropriate personal protective equipment turn off the supply of the material at its source. Shut down any equipment and plug the emission point if possible;

- II. If feasible contain the discharge and prevent it from entering drains or water courses using the spill kits provided;

- III. If necessary and safe to do so, close the interceptor valve.

- IV. Note the type of material involved, approximately how much was released into the environment and all receiving receptors;

- V. Contact all relevant authorities detailed on the Emergency Contact List and follow any instructions given;

- VI. Complete an Incident Report Form;

- VII. Where required complete a Corrective Action Form;

- VIII. Site management will determine if any spill control equipment requires replenishment.

Other Emergencies

In the event of an emergency fire, serious accident, natural disaster, explosion, or any other emergency, the alarm should be raised as follows:

- Telephone emergency number;
- Give the nature of the emergency, i.e. fire, etc;
- Give the location of the emergency;
- Give your name;
- Raise the alarm.

On hearing the alarm, all employees, visitors and contractors must:

- Stop work immediately;
- Leave immediately by the nearest exit;
- Do not stop for personal belongings;
- Go to the designated assembly point and report to your Manager;
- All visitors are the responsibility of their host and should assemble at the assembly point;
- Await instructions from the site management.

During the evening and night shifts the shift manager shall:

- Complete a head count at the assembly point. They shall organise a search for anyone missing and assess the emergency.

4. Responsibilities:

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- I. Site management are responsible for the implementation, testing and updating of emergency procedures.
- II. Site management are also responsible for adapting emergency procedures in order to meet site / services specific needs and ensuring that all staff and contractors are aware of the procedures.
- III. **All staff** are responsible for following emergency procedures.

5. Equipment Required:

- I. Spills kits;
- II. Fire fighting equipment;
- III. First Aid equipment.

6. Records:

All records must be kept for the lifetime of the Environmental Permit. The Site management are responsible for co-ordinating the Environmental Permit and will be responsible for handling, auditing and archiving of all records associated with near misses, incidents and emergencies.

7. Monitoring:

Monitoring will be via an audit process. Tests of the emergency procedures will form part of the site audit and will therefore be timetabled according to the audit timetable. Accident and emergency procedures will be reviewed as part of the audit process.

8. Correction of Non-Conformity:

An Incident Report Form will be completed following every accident, emergency or near miss. Where required a Corrective Action Form will be completed.

9. Training Need and Updating Mechanisms:

All site operatives will be trained to deal with emergency response situations and procedures outlining the correct action in an emergency situation. Training records will be kept up to date on an annual basis.

1. Purpose:

- I. Identify potential for and respond to environmental incidents and / or near miss situations;
- II. Prevent and mitigate the environmental impacts associated with incidents and / or near miss situations;
- III. Review and revise procedures where necessary and especially after incidents and / or near miss situations;
- IV. Define how periodic testing of incident and near miss procedures will be carried out;
- V. Refer to existing procedures that should be used in incidents and / or near miss situations.

2. Definitions:

What comprises an “Emergency Situation”?

For this facility it has been determined that an emergency situation in relation to environmental considerations is constituted by the escape off-site of materials potentially hazardous to health and / or the environment. This is combined with the potential of the material to be able to impact upon an identified sensitive receptor. Furthermore, where the escape of material on site is potentially hazardous to human health, this will constitute an emergency situation regardless of whether it has escaped off site or not.

What comprises an “Incident Situation”?

For this facility it has been determined that an incident situation in relation to environmental considerations is constituted following an accident where materials potentially hazardous to the environment are contained on site. Where the escape of material on site is potentially hazardous to human health, this will constitute an emergency situation regardless of whether it has escaped off site or not.

What comprises a “Near Miss”?

Any occurrence or potential occurrence identified that could lead to an emergency or incident occurring.

3. Procedure:

In the event of an emergency fire, serious accident, natural disaster, explosion, or any other emergency, the Emergency Procedure should be followed.

Following an Incident:

- I. Inform a member of Site Management;
- II. If safe to do so wearing appropriate personal protective equipment contain the incident and prevent further spread where appropriate;
- III. Follow the Spill Control Procedure;
- IV. Complete an Incident Report Form;

V. Where corrective action is required complete a Corrective Action Form.

Following a Near Miss:

- I. Inform a member of Site Management;
- II. Where appropriate render the area safe;
- III. Complete an Incident Report Form;
- IV. Where corrective action is required complete a Corrective Action Form.

4. Responsibilities:

- I. Site management is responsible for the implementation and updating of the incident and near miss procedures.
- II. Site management is also responsible for adapting incident and near miss procedures in order to meet site / services specific needs and ensuring that all staff and contractors are aware of the procedures.
- III. **All staff** are responsible for following incident and near miss procedures.

5. Equipment Required:

- I. Spills kits;
- II. Fire fighting equipment;
- III. First Aid equipment.

6. Records:

All records must be kept for the lifetime of the Environmental Permit. Site management is responsible for co-ordinating the Environmental Permit and will be responsible for handling, auditing and archiving of all records associated with near misses, incidents and emergencies.

7. Monitoring:

Monitoring will be via an audit process particular to this EMS. Incident / near miss and emergency procedures will be reviewed as part of the audit process.

8. Correction of Non-Conformity:

An Incident Report Form will be completed following every accident, emergency or near miss.

Where corrective action is required a Corrective Action Form will be completed.

9. Training Need and Updating Mechanisms:

All site operatives will be trained to deal with incident response situations and procedures outlining the correct action in an emergency situation.

1. Purpose:

To control the acceptance of waste on site.

2. Definitions:

WTN: Waste Transfer Note.

CN: Consignment Note.

EP: Environmental Permit.

LOW: List of Wastes

Hazardous Waste: A waste is hazardous if classified as hazardous by the European Waste Catalogue and the Environment Agency's Technical Guidance note WM2.

3. Procedure:

- I. All delivery drivers bringing waste on to site will drive onto the weighbridge and report to the Site Office and present the relevant waste documentation;
- II. The WTN / CN of the load will be inspected against the sites accepted list of wastes and the weight of the load noted;
- III. Where necessary loads will be visually inspected using the CCTV system at the weighbridge or a by a member of staff;
- IV. The WTN / CN will be inspected to ensure they have been fully completed and the load will be logged onto the electronic storage system; (for non-conforming loads see section below)
- V. All records are kept electronically;
- VI. The load will then be directed to the appropriate tipping point on site;
- VII. Once unloaded waste will be inspected visually by banksmen to ensure that it complies with the sites accepted list of waste.
- VIII. Once the waste has been unloaded, the driver will then proceed back over the weighbridge to be weighed in order to establish the exact volume of waste received on site;
- IX. A weighbridge ticket / receipt will be issued to the driver for public / non-scheduled waste deliveries.

Non-Conforming Loads

- I. Non-conforming loads intercepted at the weighbridge and those identified during unloading will be sent to the site isolation area for quarantine;
- II. Loads made up entirely of suspected non-conforming waste will placed to one side, inspected and a decision made by Site Management as to whether the load is to be directed back to the sender. Where loads are returned to the sender the

supplier of the waste will be informed in writing and asked to provide results of their investigation into the circumstances of the delivery.

- III. Loads containing permitted materials that are identified as odorous upon arrival with the potential to impact on sensitive receptors will be treated and removed from site as a matter of priority;
- IV. Loads identified following tipping which are odorous with the potential to impact on sensitive receptors will be treated and removed from site as a matter of priority;
- V. If waste streams arrive on site which the facility is not licensed to accept and are not returned to sender, site will send the waste to an appropriate facility for disposal or recovery.
- VI. Records of non-conforming waste received / identified at site and the action taken to remove the waste from site, will be detailed using the internal Waste Rejection System for loads identified after tipping or on Incident and Corrective Action Report Forms for all other non-conformities.

4. Responsibilities:

Site Management

- I. Responsible for ensuring that the Waste Acceptance Procedure is implemented by all staff and drivers at site;
- II. Responsible for contacting suppliers where a load made up of entirely non-conforming waste is delivered to site to provide reasons for this.

All Staff

- I. Responsible for following the Waste Acceptance Procedure;
- II. Responsible for ensuring all WTN / CN are completed accurately and logged on to the sites system;
- III. Responsible for informing Site Management in the event of a non-conforming load arriving / being discovered on site;
- IV. Responsible for ensuring non-conforming wastes identified on site are stored in the quarantine area;
- V. Responsible for completing Waste Rejection / Incident and Corrective Action Report Forms where non-conforming waste is received / identified on site.

5. Equipment Required:

Weighbridge

6. Records:

WTN's / Season Ticket WTN's and CN as applicable for all waste delivered to site will be held in the Site Office electronically.

Duty of Care records (Waste Transfer Notes) for non hazardous wastes must be held for a minimum of 2 years and consignment notes for hazardous wastes must be kept for a minimum of 3 years.

Duty of Care records will be stored electronically on site.

7. Monitoring

Control of waste will be monitored via site checks as part of the Fugitive Emissions Monitoring Programme and through the incident and corrective action reporting system.

The Waste Acceptance Procedure will be reviewed periodically as part of the Environmental Management System audits.

8. Correction of Non-Conformity:

A Waste Rejection Form will be completed where by non-conforming waste received / identified on site.

Where corrective action is required a Corrective Action Form will be completed.

9. Training Need and Updating Mechanisms:

All relevant staff will be made aware of the procedure for acceptance of waste on site.

Training records will be held on site for the duration of the EP lifetime.

1. Purpose:

To control the storage and dispatch of waste at site.

2. Definitions:

CN: Consignment Note.

EP/IPPC: Environmental Permit.

LoW: List of Wastes

Hazardous Waste: A waste is hazardous if classified as hazardous by the List of Wastes and the Environment Agency’s Technical Guidance note WM3.

WTN: Waste Transfer Note.

3. Procedure:

On- Site Handling and Storage

- I. In order to determine the appropriate LoW code for each waste stream, the waste produced by the site will be assessed by site management with reference to material safety data sheets and Technical Guidance WM3. Alternatively, material will be discussed with waste contractors, external consultants, or the regulator to determine the appropriate LoW code;
- II. Details of the waste storage areas, vessels and specifications will be stored in the Site Office in the Waste Schedule;
- III. Site management are responsible for ensuring sufficient and correct vessels / storage areas for each waste stream are provided on site;
- IV. All staff will ensure that all wastes are disposed of / stored in the correct vessels;
- V. No chemical spills can be disposed of in the containers provided unless a member of site management has confirmed that it can be disposed of in this way;
- VI. Site management are to be informed immediately if waste vessels / storage areas are full or there are insufficient numbers of vessels / storage space to dispose of waste;
- VII. Site management will arrange for off-site disposal / recovery of on-site waste at a frequency which prevents a shortage of waste vessel / storage space capacity;
- VIII. Waste vessels / storage areas will be inspected as part of the installation’s Fugitive Emission Monitoring Programme to ensure that the waste is controlled and that waste storage areas / vessels are in good condition and capable of controlling the waste;

- IX. Food waste will be stored on site for no longer than 24 hours in stockpiles no more than 2 metres high.

Bottom Site Green Waste and Municipal Solid Waste (MSW)

- X. Where green wastes and MSW are tipped, they will be done so in a stock rotation manner to prevent the older materials from remaining at the bottom of waste piles, and ensuring wastes with the greater odour potential are treated and removed off site as a priority;
- XI. Green waste and MSW will be stored on site for no longer than 1 month. If these waste streams are to be stored for longer periods, Site Management will contact the Environment Agency to confirm that there is minimal environmental risk from prolonged storage with particular regard for odour;
- XII. Vehicles carrying loads of green waste and MSW are to be covered when the materials are dispatched from site.

Waste Dispatch

- I. All waste being transferred from site must be accompanied by a Waste Transfer Note (WTN) or WTN season ticket be in place, or a Consignment Note (CN) if the waste is classified as hazardous;
- II. The WTN and CN must detail information on;

<p>WTN need to provide the following information:</p> <ul style="list-style-type: none"> • SIC code (2007 list); • Origin of wastes; • Quantity; • Transport Date; • Carrier Details; • Recipients Details; • Description; • EWC Codes; • Handling Requirements; • Packaging Arrangements; • Signed by Site and Carrier. 	<p>CN Must have the following:</p> <ul style="list-style-type: none"> • Consignment Note Code; • Address of Producer; • Premises Code; • Address of Consignee; • Waste Arising Process; • Standard Industrial Code (2003 list); • LoW Code; • Quantity; • Physical Form; • Chem. & Bio Constituents; • Hazard Codes; • Container Type/ No.; • Carrier Name & Address; • Registration No.; • Reason for Exemption if applicable; • Vehicle Reg.
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- III. The WTN's and CN's must be signed by site (this is a legal requirement) and the haulier taking the waste, upon collection;
- IV. All waste contractors will have appropriate licences and certification. Copies of the original documents will be requested by Site Management and a copy held electronically in the Site Office. The status of all licences and certification will be reviewed as part of the Environmental Management System audit;
- V. Receipt documentation will be kept to further account for the waste volumes sent for disposal / recovery.

4. Responsibilities:
Site Management

- I. Responsible for providing clearly labelled containers which staff can use to dispose of / bulk waste.
- II. Responsible for ensuring that the Waste Transfer / Consignment Notes accurately describe the waste according to the code detailed in the LoW.
- III. Arranging for specialist contractors to dispose of material that is not described on the Waste Transfer / Waste Consignment Note.
- IV. Responsible for ensuring that the contractors that remove and dispose of waste are licensed to do so by the relevant regulator;
- V. Site management will review the Waste Schedule during EMS audits to ensure this is kept up to date.
- VI. Site management are responsible for ensuring appropriate staff receive adequate training to deal with all waste streams produced on site.
- VII. Responsible for ensuring that staff are aware of the wastes that may be disposed of and the waste vessels that may be used on site.
- VIII. Responsible for signing any waste documentation collected by Contractors for off-site removal.

All Staff

- I. Responsible for disposing / bulking of waste in the correct bins or containers.
- II. Responsible for storing any waste that is not described on the transfer notes and seeking assistance from the Site management.

5. Equipment Required:

Waste storage vessels

6. Records:

WTNs and Season Ticket WTN's for all waste will be held in the Site Office electronically.

Consignment Notes for any hazardous waste will be held in the Site Office electronically.

Duty of Care records (Waste Transfer Notes) for non hazardous wastes must be held for a minimum of 2 years and consignment notes for hazardous wastes must be kept for a minimum of 3 years. All records related to the Environmental Permit must be held for 6 years or the permit lifetime for records in relation to off-site environmental effects.

7. Monitoring:

Control of waste will be monitored via site checks as part of the Fugitive Emissions Monitoring Programme and through the incident and corrective action reporting system.

The Waste Storage and Dispatch Procedure will be reviewed periodically as part of the Environmental Management System audits.

8. Correction of Non-Conformity:

An Incident Report Form will be completed where by the Waste Storage and Dispatch Procedure has not been followed.


Where corrective action is required a Corrective Action Form will be completed.

9. Training Need and Updating Mechanisms:

All relevant staff will be made aware of the procedure for the correct disposal of waste on site.

Training records will be held on site for the duration of the EP lifetime.

Any changes of the nature of the waste materials will require training to be updated as required.

	Odour Assessment Procedure	
Document Reference: EM 02-005	Issue Number: 2	Issue Date: 28.07.22

1. Purpose:

Assess the level of odour generation on site and the potential for off-site impacts so that pro-active mitigation can be undertaken.

2. Procedure:

- Consider the receptors close to the site and select locations on the site that are close to these receptors. Record these points on the site plan;
- As a minimum, one monitoring point will be located on each site boundary with one point downwind of the permitted activities;
- The person undertaking the assessment must not have entered any processing area within the facility that day prior to carrying out the assessment;
- Spend at least two minutes at each point and record the odour in terms of its intensity and extent using the following scales:

Odour Intensity

1. No detectable odour.
2. Faint odour (barely detectable, need to stand still and inhale facing into the wind).
3. Moderate odour (odour easily detected while walking and breathing normally).
4. Strong odour (strong but bearable).
5. Very strong odour (very offensive, possibly causing nausea, particularly if not accustomed to this odour).


Extent of the Odour

1. Local and transient (only detectable on the installation or within the installation boundary during brief periods when wind drops or blows).
2. Transient as above, but detected outside of the boundary.
3. Persistent but fairly localised.
4. Persistent and pervasive up to 50m outside the installation boundary.
5. Persistent and widespread (odour detected >50m from the boundary).

Note: Odour is assessed off-site when odour is detected at the site boundary at either an intensity of 4 or above and / or an extent of 4 or above.

- Record the following information on the Odour Monitoring Form:
 1. Time and Date;
 2. Name of the person carrying out the survey;
 3. Site operations such as deliveries, waste processing, cleaning of process building and removal of wastes;
 4. The weather including cloud cover, wind direction and wind speed.
- Where off-site odours are detected which could impact on receptors, perform the following:

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	Odour Assessment Procedure	
Document Reference: EM 02-005	Issue Number: 2	Issue Date: 28.07.22

- Inform the Site Management;
- Complete Incident Report Form;
- Identify likely source;
- Complete Corrective Action Form;
- Mitigate where possible;
- Inform the Regulator.

3. Responsibilities:

Site Management

1. Responsible for ensuring that staff are aware of the need to monitor odour generation on site in order to prevent or control odour emissions;
2. Responsible for identifying the odour assessment locations and marking these points on the Odour Monitoring Location Plan;
3. Responsible for ensuring that the odour assessment forms are up to date and being completed correctly;
4. Responsible for reviewing the completed odour assessments and reviewing the frequency of the monitoring, odour sources, problems encountered;
5. Revising the odour assessments as necessary.

All Staff

1. Responsible for following the Odour Assessment Procedure;
2. Responsible for undertaking and completing the odour assessments when requested;
3. Responsible for reporting abnormal odour sources to the Site Management.

6. Equipment Required:

Odour Monitoring Form.

7. Records:

Records of the completed monitoring forms will be kept in the Site Office.

All records must be kept for the Environmental Permit lifetime.

8. Correction of Non-Conformity:

An Incident Report Form will be completed when odour is detected at the site boundary at intensity of 4 or above. Where required a Corrective Action Form will be completed.

9. Training Need and Updating Mechanisms:

All staff that will be required to undertake the odour monitoring will receive training in the correct use of the procedure and forms.

Training records will be held on site for the duration of the Environmental Permit lifetime.

Any changes of the nature of the procedure and forms will require training to be updated.

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1. Purpose:

The purpose of the procedure is to manage the storage of waste on site in order to minimise the potential for stored waste to catch fire.

2. Definitions:

IPPC / EP: Environmental Permit.

3. Procedure:

- I. Waste is to be accepted on site in accordance with the Waste Acceptance Procedure;
- II. Where materials are tipped within the SRF and RDF buildings, this will be done in a stock rotation manner to prevent the older materials from remaining at the bottom of waste piles, increasing their potential to catch fire;
- III. Where waste materials accepted fresh on site require to be treated in priority to older waste materials, the reason for this will be noted on an Incident Report Form;
- IV. Where prolonged hot weather conditions increase the potential for stockpiles of waste to catch fire, Site Management will ensure that the stockpiles are rotated in line with their operating experience.
- V. Daily site inspections will be undertaken to ensure that housekeeping levels at site are to the required standard and that all fire fighting equipment is in place.
- VI. In the event of a fire on site follow the Emergency Procedure.

4. Responsibilities:

Site Management

- I. Responsible for ensuring that all staff are aware of the need to control the storage of waste to minimise the potential for the waste to catch fire;
- II. Responsible for ensuring that all relevant staff are aware of the Fire Control Procedure.

All Staff

- I. Responsible for following the procedure.
- II. Responsible for reporting instances where the procedure was not or could not be followed resulting in an incident or near miss.

5. Equipment Required:

Fire Fighting Equipment

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6. Records:

Records of any environmental Incidents will be kept as part of the facilities corrective action structure.

All records related to the Environmental Permit must be held for 6 years or the permit lifetime for records in relation to off-site environmental effects.

7. Monitoring:

Site housekeeping levels and fire equipment will be monitored as part of the daily site checks.

8. Correction of Non-Conformity:

An Incident Report Form will be completed when the Fire Control Procedure has not been followed.

Where corrective action is required a Corrective Action Form will be completed.

9. Training Need and Updating Mechanisms:

All designated staff will be made aware of the Fire Control Procedure.

Training records will be held on site.

NOTE – This procedure will be superseded by the Fire Prevention Plan once approved by the EA

1. Purpose:

Control, mitigation, clean-up of spills and/or leaks of chemicals, wastes or other hazardous substances on site.

2. Definitions:

PPC / EP: Environmental Permit

3. Procedure:

In the event of a spill / leak:

- Inform a member of the site management
- If safe to do so and wearing appropriate personal protective equipment, stop the leak / spill at source if possible. Switch off any pumps or plug the leak if possible.
- If not contained by a bund contain the spill and prevent it from entering drains using the spill kits provided.
- If necessary close any interceptor discharge valves;
- Soak up the spill and transfer it to a suitable container. If the volume is too large to soak up, pump into containers for disposal. Ensure these containers are labelled and stored in a bunded area prior to disposal.
- Note the type of material involved, approximately how much was spilt and how much may have entered the drains.
- Where necessary ensure drains and associated infrastructure are cleaned out by an appropriate contractor;
- Complete an Incident / Corrective Action Report Form.
- Site management will inform the relevant authorities.
- Site management will determine if the waste may be disposed as part of the general, non hazardous site waste or if it needs to be disposed of as hazardous waste.
- Site management will ensure that an Incident / Corrective Action Report Form has been completed and the site manager will ensure that the corrective actions have been instigated.
- Site management will determine if spill control equipment requires replenishment.

4. Responsibilities:

Site Manager

- i. Responsible for ensuring that staff are aware of the need to control spills of hazardous materials and disposed of them correctly.
- ii. Responsible for determining which materials will need to be disposed of as hazardous waste.
- iii. Responsible for ensuring that spill control equipment is available to staff, that it is replaced when necessary and that staff are trained in its use.
- iv. Responsible for ensuring that corrective actions required following a spill or near miss are implemented.

All Staff

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- i. Responsible for using the spill control equipment provided to prevent spills of hazardous materials.
- ii. Responsible dealing with spills of materials as directed in the procedure.
- iii. Responsible for reporting spills to the site manager and completing the relevant sections of the Incident / Corrective Action Report Form.

5. Equipment Required:

- Spill control equipment

6. Records:

- Records of any spills will be kept as part of the site’s incident / corrective action structure.
- Waste transfer notes / Consignment notes for all waste will be stored in the site office.
- All records related to the Environmental Permit must be held for 6 years or the permit lifetime for records in relation to off-site environmental effects.

7. Monitoring:

Spill control equipment will be checked as part of the Fugitive Emissions Monitoring Programme inspections.

8. Correction of Non-Conformity:

The Incident / Corrective Action Report form will detail any corrective actions required and ensure that it has been actioned.

9. Training Need and Updating Mechanisms:

All staff that will routinely come into contact with the hazardous materials held on site will receive training in the correct storage and handling of the materials and receive training in the use of spill control equipment. Training records will be held on site for the duration of the Environmental Permit lifetime.

Any changes to the nature of the materials stored and spill equipment to be used will require training to be reviewed, updated and staff re-trained.

1. Purpose:

Control deliveries and collections of potentially hazardous materials to site.

2. Definitions:

EP: Environmental Permit.

FEMP: Fugitive Emissions Monitoring Programme.

3. Procedure:

Deliveries of Hazardous Materials to Site

- I. All delivery drivers shall report to the Site Office on arrival.
- II. The office is responsible for ensuring that the delivery is made to the correct area.
- III. All bulk liquid deliveries shall ensure that connections to pipe work should be made in the designated connection area.
- IV. Drum and other container deliveries will be directed to the appropriate site area and unloaded by a qualified forklift driver. The drums and containers will be placed in their designated storage areas.
- V. Delivery drivers will report to the Site Office on departure to confirm that no spills of the delivered material have occurred.
- VI. All spills and leaks that occur during manual distribution will be reported to site management.
- VII. If a spill occurs the Spill Control Procedure will be followed.

Collection of Hazardous Materials from Site

- I. All vehicles collecting hazardous materials must report to the site office on arrival ;
- II. The relevant member of staff is responsible for ensuring that the collection is made from the correct area and collects the correct materials;
- III. All connections to pipe work should be made in the designated connection area;
- IV. Vehicles collecting IBCs and Drums will be directed to the appropriate site area and loaded by a qualified forklift driver;
- V. All spills and leaks that occur during manual distribution will be reported to site management;
- VI. If a spill occurs the Spill Control Procedure will be followed.

4. Responsibilities:

Site Management

- I. Responsible for ensuring that managers and staff are aware of the need to control deliveries, distributions and collections in order to prevent spillages on site;
- II. Ensure that all suppliers are aware of the need to liaise with appropriate staff for deliveries, distributions and collections on site;

- III. Responsible for reporting and completing the Incident Report Form and Corrective Action Report Form when the procedure has not been followed.
- IV. Responsible for ensuring that corrective actions required following a spill or near miss during a delivery / collection are implemented.

All Staff

- I. Responsible for following the Delivery and Collection Procedure;
- II. Responsible for reporting where the procedure was not or could not be followed.

5. Equipment Required:

Spill kits.

6. Records:

Records of any spills will be kept as part of the sites incident / corrective action structure.

All records related to the Environmental Permit must be held for 6 years or the permit lifetime for records in relation to off-site environmental effects.

7. Monitoring:

Spill control equipment will be checked as part of the FEMP.

8. Correction of Non-Conformity:

An Incident Report Form will be completed where the Delivery and Collection Procedure has not been followed.

Where corrective action is required a Corrective Action Form will be completed.

9. Training Need and Updating Mechanisms:

All staff that will routinely come into contact with the chemicals held on site will receive training in the correct storage of hazardous materials.

Training records will be held on site for the duration of the Environmental Permit.

Any changes of the nature of the materials stored and used will require training to be reviewed, updated and staff trained..

1. Purpose:

Control the storage of hazardous materials on site.

2. Definitions:

IPPC / EP: Environmental Permit

FEMP: Fugitive Emission Monitoring Programme;

MSDS: Material Safety Data Sheet;

COSHH: Control of Substances Hazardous to Health.

3. Procedure:

1. All hazardous materials stored on site will have a designated and labelled storage area and have been marked on the Bulk Storage Plan.
2. Hazardous materials storage areas will be enclosed or will be fully bunded and in close proximity to spill control equipment adequate to control the chemicals stored;
3. Any instances of materials stored in the wrong place will be detailed on Incident / Corrective Action Report Forms.

4. Responsibilities:

Site Manager

1. Responsible for ensuring that staff are aware of the need to control storage of hazardous materials on site in order to prevent or control spills on site.
2. Responsible for providing adequate storage for hazardous materials which is either bunded or has spill control equipment stored in close proximity.
3. Responsible for ensuring that materials stored on site are classified as hazardous (or not) and that storage of these materials on site is kept to a working minimum.
4. Responsible for reporting and completing an Incident / Corrective Action Report when the procedure has not been followed.

All Staff

1. Responsible for following the hazardous materials storage procedure.
2. Responsible for reporting instances where the procedure was not or could not be followed.

5. Equipment Required:

Spill control equipment in close proximity to hazardous materials storage areas.

6. Records:

Records of any incorrect storage will be kept as part of the site's incident / corrective action structure.

Records of the hazardous materials inventory and a map of site storage locations will be kept and updated when required.

All records related to the Environmental Permit must be held for 6 years or the permit lifetime for records in relation to off-site environmental effects.

7. Monitoring:

Hazardous materials storage areas will be inspected as part of the FEMP inspections.

8. Correction of Non-Conformity:


The Incident / Corrective Action Report Form will detail any corrective actions required and ensure that it has been actioned.

9. Training Need and Updating Mechanisms:

All staff that routinely come into contact with chemicals held on site will receive training in the correct handling and storage of chemicals.

Training records will be held on site for the duration of the Environmental Permit lifetime.

Any changes of the nature of the hazardous materials stored and used will require training to be reviewed, updated and further training undertaken

	NEW PROJECTS PROCEDURE	
Document Reference: EM 02-010	Issue Number: 2	Issue Date: 28.07.22

1. Purpose:

To assess proposed changes to the existing process / infrastructure or the implementation of new processes at the site that may impact on the environment to ensure that the operational and maintenance systems used to minimise these risks are maintained.

Any changes made which will have an environmental impact may require an application for an environmental permit variation.

2. Definitions:

IPPC / EP: Environmental Permit.

3. Procedure

- I. Site Management will meet to decide if any changes to the site processes / introduction of new equipment or practices on-site warrants the revision of the environmental risk associated with the changes or new processes.

This will be based on the following questions:

1. Do the changes involve a new item of plant?

If **YES** a full assessment is required. If **NO** go to question 2.

2. Will the changes reduce the effectiveness of current control measures - Planned Preventative Maintenance, Training, Operating Procedures, Accident Management Plan, Fugitive Emissions and Monitoring Programme?


If **YES**, an assessment of the potential impacts is required. If **NO**, the current systems control the risks adequately and no further action is required.

- II. If a full assessment is required, Table 1 will be completed. The potential environmental impacts of the proposed process / changes will be listed under the relevant columns;
- III. Following an assessment of the potential impacts a risk assessment will be undertaken for each potential environmental impact listed in Table 1 and this will be recorded in Table 2. The proposed changes will be listed together with the potential hazards and current safeguards / control measures. The risk will then be calculated based on the likelihood of an impact occurring given the current safeguards and the severity of the impact should it occur as detailed below.

Probability of an event occurring:

Score	Description	Definition
1	Very low	Extremely unlikely to occur (<1 per 10 years)
2	Low	Unlikely to occur (<1 per year)
3	Moderate	Could occur (1 per year)

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	NEW PROJECTS PROCEDURE	
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4	High	Could occur frequently (>1 per year)
5	Very high	Could occur continuously

Severity of impact should the event occur:

Score	Description	Definition
1	Very low	Negligible impact
2	Low	Minor impact (contained in localised area on site & recoverable)
3	Moderate	Medium impact (contained within site boundary & recoverable)
4	High	Major impact (spread off site &/or difficult to recover)
5	Very high	Major impact (spread off-site & long term/permanent damage)

Risk Assessment:

The Probability (P) and Severity (S) scores assigned to each item are then multiplied together to provide a total risk assessment score (R):

$$P \times S = R$$

Scores are considered to be high or low risk using the following risk classification:

< 10 – Low Risk


≥ 10 – High Risk

- If the risk is classified as high, details of the additional control required will be listed here. The list will be generated with reference to current monitoring, maintenance, and training procedures;
- If more than one option is available and being considered as part of the change to processes or infrastructure the tables will be completed for each option. A comparison may then be made between the environmental risks associated with each option together with the cost of each option and the cost of managing the risks associated with each option;
- This will allow the selection of the most economically viable option that has the least environmental impact;
- Site management will then ensure that any updates to the sites operational or maintenance systems are implemented if the new or changed process is introduced.

4. Responsibilities:

Site Management

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	NEW PROJECTS PROCEDURE	
Document Reference: EM 02-010	Issue Number: 2	Issue Date: 28.07.22

1. Responsible for assessing changes to current processes or new processes on site using the New Projects Procedure;
2. Responsible for ensuring that any updates to the sites operational or maintenance systems are implemented as the new or changed process is introduced.

5. Equipment Required:

N / A

6. Records:

Site Management will ensure that any assessments of new processes or projects are stored under Site Closure Plan Records for the lifetime of the environmental permit.

7. Monitoring:

N / A

8. Correction of Non-Conformity:

An Incident Report Form will be completed where the New Projects Procedure could not be followed.

Where corrective action is required a Corrective Action Form will be completed.

9. Training Need and Updating Mechanisms:

Training of the New Projects Procedure will be given to all necessary staff.

10. Reference Documents / Associated Procedures:

All procedures and system documentation.


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Table 1 Environmental Impacts:

Proposed Change or Addition to the Process	Potential Environmental Impact. (Consider Normal, Abnormal; and Emergency Conditions) of the Proposed New or Changed Process.				
	Emissions to Air	Discharges to Water / Sewers	Solid Wastes	Contamination of Land	Discharge of Thermal Energy, Noise, Odour, Dust, Vibration and Visual Impact.

Table 2 Risk Assessment:

Identification of Process Change, New Process or New Infrastructure	Assessment of the Impacts (hazard x probability) and their Possible Consequences					Details of controls required. (Consider, monitoring, maintenance, training, and procedures)
	Impact / Consequences	Current Safeguards	Risk Scoring			
			P	S	R	
<i>E.g. New waste treatment infrastructure requiring fuel supply.</i>	<i>Materials enter land or process drains.</i>	<i>Current fuel storage inspected as part of FEMP</i>	2	4	8	<i>Yard areas and fuel supply pipes to be inspected as part of FEMP</i>

	DOCUMENT CONTROL PROCEDURE	
Document Reference: EM 02-011	Issue Number: 2	Issue Date: 28.07.22

1. Purpose:

To control all documentation that forms part of the EMS.

2. Definitions:

IPPC / EP: Environmental Permit

3. Procedure:

- I. The controlled copy of the Environmental Management System documentation will be held by the Site Manager and stored in the following location:
 - o Site Office (all master copies).
- II. Copies of individual EMS documents will be issued by the Site Manager to staff that require them;
- III. The Site Manager is responsible for the review and update of all controlled documents.
- IV. All issued documents will have a “version number”. This will increase by an increment of “1” when any controlled document is amended or updated;
- V. The Site Manager is responsible for updating the EMS index and controlled system copies;
- VI. The Site Manager will issue updated versions of controlled documents to all staff that require them;
- VII. The Site Manager will record the nature of the update on a copy of the Document Control Update Form;
- VIII. The Site Manager will also record the return of obsolete documents on the same form to provide an audit trail showing that all versions are up to date;
- IX. The Site Manager will maintain the system documentation either in hard copy, on computer or a mixture of both formats. Only documentation held by the Site Manager will be considered controlled;
- X. One copy of all superseded documents will be held in the archive;
- XI. A Corrective Action Report Form will be completed if an old version of any documentation is discovered in use.

4. Responsibilities:


Site Manager

- I. Responsible for reviewing, updating and issuing all EMS documents;
- II. Responsible for ensuring that up to date documents are distributed to the relevant staff;
- III. Responsible for removing obsolete versions of any updated documents issued;
- IV. Responsible for seeking consultation from all relevant parties when reviewing and updating EMS documents.

All Staff

- I. Responsible for using the most up to date EMS documents;
- II. Responsible for informing the Site Manager if they believe an EMS document to be obsolete.

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	DOCUMENT CONTROL PROCEDURE	
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5. Equipment Required:

N/A

6. Records:

The Site Manager will maintain control of the system documentation.

7. Monitoring:

The referenced documents will be reviewed annually by the Site Manager in consultation with appropriate site staff.

Any persistent document control issues will be reviewed and amended at this point. All records will be kept for the lifetime of the Environmental Permit.

8. Correction of Non-Conformity:

The Document Control Update Form will detail any changes in procedures and conformation that such changes have been actioned.

9. Training Need and Updating Mechanisms:

All required staff will be trained in the structure of the Document Control Procedure and made aware of procedure/ monitoring documentation updates.

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1. Purpose:

To manage environmental complaints from third parties and communication with regulatory authorities.

2. Definitions:

IPPC / EP: Environmental Permit.

3. Procedure:

- I. Staff receiving complaints direct via the telephone or in person will record the complaints in the Site Diary.
- II. The information recorded within the Site Diary together with letters of complaint or communication from authorities will be passed on to Site Management.
- III. Site Management will determine if a complaint requires immediate action. If not the complaint will be reviewed by the management team to determine if it is a justified complaint.
- IV. If a definite cause for the complaint is identified corrective action will follow as detailed within the Corrective Action Form.
- V. The implementation of the corrective action will be reviewed by Site Management and the Corrective Action Form signed off on successful completion. The complainant will be notified of the changes made and the complaint will be deemed to be resolved.
- VI. Where no specific cause can be found regarding the complaint, Site Management will monitor the particular issue for recurrence and a response will be issued to the complainant and the matter deemed to be resolved.

4. Responsibilities:

Site Management

- I. Responsible for ensuring that all staff are aware of the need to manage complaints and communication with authorities.
- II. Responsible for ensuring that corrective actions required following a complaint and / or communication with the authorities are implemented.
- III. Responsible for ensuring that all relevant staff are aware of the Complaints Procedure.
- IV. Responsible for ensuring that all staff designated to receive complaints are aware of the procedure and their role within that procedure.

All Staff

- I. Responsible for following the procedure.
- II. Responsible for reporting instances where the procedure was not or could not be followed resulting in an incident or near miss.

5. Records:

Records of any environmental complaints will be kept as part of the facilities corrective action structure in the Site Diary.

Records of communication with the regulatory authorities will be stored in the Site Office.

All records related to the Environmental Permit must be held for 6 years or the permit lifetime for records in relation to off-site environmental effects.

6. Monitoring:

Complaints and communication with authorities will be reviewed as part of an annual EMS review.

7. Correction of Non-Conformity:

The Site Diary will detail any complaint received by site and an Incident Report Form will be completed when the Complaints Procedure could not be followed.

Corrective actions required following a complaint or when the Complaints Procedure could not be followed will be detailed on a Corrective Action Report Form.

8. Training Need and Updating Mechanisms:

All designated staff will be made aware of the Complaints Procedure.

Training records will be held on site.

1. Purpose:

Assess the level of noise generation on site and the potential for off-site impacts so that proactive mitigation can be undertaken.

2. Procedure:

When a noise complaint arises or activities on site give due cause for concern (commissioning activities, during production start up), perform the following:

- Consider the receptors close to the site and select locations on the site that are close to these receptors. Record these points on the site plan;
- As a minimum, one monitoring point will be located on each site boundary;
- Spend at least three minutes at each point and record the noise level in terms of its volume using the following scale:

Noise Volume

1. Inaudible;
 2. Barely audible;
 3. Clearly audible;
 4. Loud and intrusive.
- Record the following information on the Noise Monitoring Form:
 1. Time and Date;
 2. Name of the person carrying out the survey;
 3. Site operations such as deliveries, waste unloading/loading, removal of wastes;
 4. The weather including cloud cover, wind direction and wind speed (using data provided by the on-site weather station);
 5. Possible nuisance characteristics of the noise;
 6. Nature of the noise present on-site.
 - Where noise levels are detected which could impact on receptors, perform the following:
 - Inform Site Management;
 - Complete Incident Report Form;
 - Identify likely source;
 - Complete Corrective Action Form;
 - Mitigate where possible;

3. Responsibilities:

Site Management

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1. Responsible for ensuring that staff are aware of the need to monitor noise generation on site in order to prevent or control noise emissions;
2. Responsible for identifying the noise assessment locations and marking these points on the Noise Monitoring Location Plan;
3. Responsible for ensuring that the noise assessment forms are up to date and being completed correctly;
4. Responsible for reviewing the completed noise assessments reviewing the frequency of the monitoring, noise sources, problems encountered;
5. Revising the noise assessment forms as necessary.

All Staff

1. Responsible for following the Noise Assessment Procedure;
2. Responsible for undertaking and completing the noise assessments as required;
3. Responsible for reporting abnormal noise sources to the Site Management.

6. Equipment Required:

Noise Monitoring Form.

7. Records:

Records of the completed monitoring forms will be kept in the Site Office. All records must be kept for the environmental Permit lifetime.

8. Correction of Non-Conformity:

An Incident Report Form will be completed when noise is detected at the site boundary and recorded as being '4. Loud and Intrusive'.

9. Training Need and Updating Mechanisms:

All staff that will be required to undertake the noise monitoring will receive training in the correct use of the procedure and forms.

Training records will be held on site for the life of the Environmental Permit .

Any changes of the nature of the procedure and forms will require training to be updated.

1. Purpose:

To prevent the emissions of dust from site and to control workplace dust exposure levels

2. Definitions:

PPC / EP: Environmental Permit

3. Procedure:

If abnormal dust emissions from any part of the site or process are observed:

- Inform site supervisor or a member of the site management team
- Activate the internal building Mist Air System
- Activate mobile water spray & misting systems in areas of concern
- If necessary, cease operations generating dust such as trommel, shredding, loading etc.
- If necessary, hose down any wastes that are likely to cause dust upon tipping.
- Note the type of material involved to assess for future occurrences
- Site Management will where necessary notify the waste producer to discuss methods of containment i.e. bagged or damped prior to removal from the producer's site
- Site management will ensure that an Incident / Corrective Action Report Form has been completed and the site manager will ensure that the corrective actions have been instigated.
- Site management will determine if dust control equipment requires refurbishment.

4. Responsibilities:

Site Manager

- Responsible for ensuring that all members of staff are aware of the need to control dust.
- Responsible for determining which materials will need specific treatment.
- Responsible for ensuring that dust control equipment is available to staff, that it is effective, replaced when necessary and that staff are trained in its use.
- Responsible for ensuring that corrective actions required following a dust issue are implemented.

All Site Operatives

- Responsible for using dust controlling equipment provided to prevent escape of materials.
- Responsible for dealing with dust issues as directed in the procedure.
- Responsible for reporting dust issues to the site manager and completing the relevant sections of the incident / corrective action report form.

5. Equipment / Control Measures

The following dust control systems shall be used and maintained at all times.

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Ellgia Ltd		Stephen Kent

- Road sweeper - at least three site rounds per day
- Mobile Dust Suppression Equipment

- Sheeting System on vehicles
- 5 mph speed limit

Wherever practicable; all operations which potentially generate dust shall be carried out inside a suitable building or in areas enclosed with suitable windbreaks or screens to prevent dust emissions from site.

6. Records:

- Records of any complaints will be kept as part of the site’s procedures
- All records related to the Environmental Permit must be held for 6 years or the permit lifetime for records in relation to off-site environmental effects.

7. Monitoring:

Dust control equipment will be checked as part of the Fugitive Emissions Monitoring Programme inspections.

A dust monitoring exercise shall be carried out at least every two years.

8. Correction of Non-Conformity:

Any significant dust emissions incidents will be documented in the corrective action report, and the General Manager shall ensure that any corrective actions are completed.

9. Training Need and Updating Mechanisms:

All site staff will routinely receive training in the correct procedures for monitoring and using dust control equipment. Training records will be held on site for the duration of the permit.

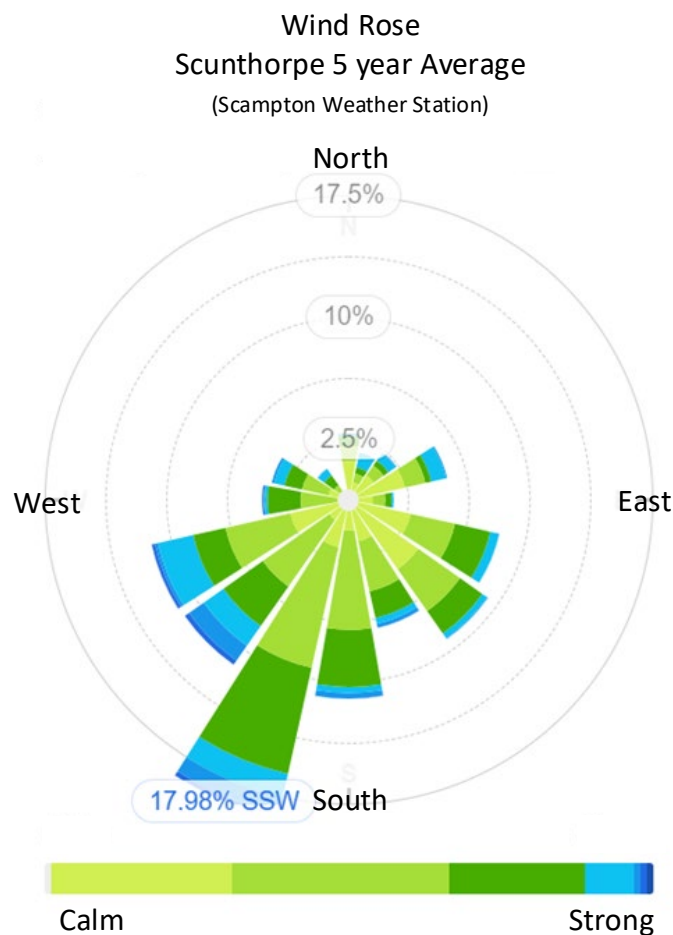
1. Purpose:

To monitor the effects of severe weather on site operations and take corrective actions to prevent fugitive emissions due to high winds.

2. Definitions:

PPC / EP: Environmental Permit

High winds: Any winds at or above number 4 on the Beaufort scale (moderate breeze, 13-17 mph, land condition dust and loose paper raised. Small branches begin to move. (see Beaufort Scale in Annex A)



3. Procedure:

The wind conditions on site shall be recorded at least once per day in the site diary, noting the time of observation, wind direction and speed and any observable wind impact in the area.

Senior managers and operations supervisors shall subscribe to the Met Office Weather alert email system; <https://service.govdelivery.com/accounts/UKMETOFFICE/subscriber/new>

If strong winds are observed or are known to be forecast the following process shall be invoked

- Inform site supervisor or a member of the site management team
- Site managers shall conduct site inspections to assess any the impact of weather conditions and the conditions of boundary and catch fences
- If possible, operations can be maintained with mitigating actions such as dust suppression or moving loading operations away from boundaries
- If necessary, cease any operations generating dust or giving rise to windborne fugitive emissions.
- Operations shall be immediately ceased if:
 - Wind speed exceeds number 7, 31-38 mph
 - Or
 - Litter is observed being blown off site

If operations are ceased the senior manager on site shall inform the Environment Agency and review site conditions regularly until it is safe to recommence.

The senior manager on site shall inform the Environment Agency when operation recommence after a stoppage due to severe weather.

If severe weather is forecast to last for more than one day, the relevant managers shall agree and implement any operational requirements to mitigate the operational and environmental impact such as diverting material before reaching site or using alternative processes.

4. Responsibilities:

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Ellgia Ltd		C. Murdoch

Site Manager

- Responsible for ensuring that all members of staff are aware of the need to observe weather conditions and report any observable impact on site.
- Responsible for determining which processes should be ceased due to potential for fugitive emissions
- Responsible for ceasing operations based on the criteria given above and informing the Environment Agency of cessation and recommencement of operations
- Responsible for ensuring that corrective actions required following a weather issue are implemented, such as catchfence repairs or enhancements

All Site Operatives

- Responsible for being vigilant and reporting any observable impacts of severe weather conditions to management team
- Using dust controlling equipment provided to prevent escape of material where possible and available
- Complete the relevant sections of the incident / corrective action report forms are required

5. Equipment / Control Measures

Wind direction and speed shall be recorded using the BOC windsock and Met Office official data:

<https://www.windfinder.com/#11/53.6310/-0.6736>

<https://www.metoffice.gov.uk/weather/warnings-and-advice/uk-warnings>

- The dust control procedure shall always be observed
- Wherever practicable; all operations which potentially generate fugitive emissions shall be carried out inside a suitable building or in areas enclosed with suitable windbreaks or screens.

6. Records:

- Records of any complaints will be kept as part of the site’s procedures
- All records related to the Environmental Permit must be held for 6 years or the permit lifetime for records in relation to off-site environmental effects.

7. Monitoring:

Fugitive Emissions Monitoring inspections shall be carried out at least every two years and shall include all related equipment such as dust suppression systems, road sweeper, catchfences, site litter picking schedules etc.

Any corrective actions identified during this review shall be implemented with 2 months of the inspection and signed off by the site manager.

8. Correction of Non-Conformity:

Any significant fugitive emissions incidents will be documented in the corrective action report, and the General Manager shall ensure that any corrective actions are completed.

9. Training Need and Updating Mechanisms:

All site staff will routinely receive training in the correct procedures for monitoring weather conditions and reporting observable impacts of wind.

Annex A - Beaufort Wind Force Scale

Number	Wind speed		Description	Land Conditions
	mph	kts		
0	<1	<1	Calm	Calm. Smoke rises vertically.
1	1-3	1-2	Light air	Wind motion visible in smoke.
2	3-7	3-6	Light breeze	Wind felt on exposed skin. Leaves rustle.
3	8-12	7-10	Gentle breeze	Leaves and smaller twigs in constant motion.
4	13-17	11-15	Moderate breeze	Dust and loose paper raised. Small branches begin to move.
5	18-24	16-20	Fresh breeze	Branches of a moderate size move. Small trees begin to sway.
6	25-30	21-26	Strong breeze	Large branches in motion. Whistling heard in overhead wires. Umbrella use becomes difficult. Empty plastic bins and cans tip over.
7	31-38	27-33	High wind, moderate gale, near gale	Whole trees in motion. Effort needed to walk against the wind. Swaying of skyscrapers may be felt, especially by people on upper floors.
8	39-46	34-40	Fresh gale	Twigs broken from trees. Cars veer on road.
9	47-54	41-47	Strong gale	Larger branches break off trees, and some small trees blow over. Construction/temporary signs and barricades blow over. Damage to circus tents and canopies.
10	55-63	48-55	Whole gale, storm	Trees are broken off or uprooted, saplings bent and deformed, poorly attached asphalt shingles and shingles in poor condition peel off roofs.
11	64-72	56-63	Violent storm	Widespread vegetation damage. More damage to most roofing surfaces, asphalt tiles that have curled up and/or fractured due to age may break away completely.
12	≥73	≥64	Hurricane force	Considerable and widespread damage to vegetation, a few windows broken, structural damage to mobile homes and poorly constructed sheds and barns. Debris may be hurled about.

Document Reference: EM 03-001

Issue Number: 2

Issue Date: 28.07.22

Location on Site:	Report Ref No.:
Team / Staff involved:	Date of Incident:

Description of the environmental incident or near miss. Please detail what happened, who was involved, what action was taken, what procedures were followed, who was contacted and any other information you consider relevant.

Continue on separate sheet if necessary & add report Ref. to each page. Attach any further sheets to this one.

Corrective Action Required Yes / No	Corrective Action Form Reference:
EA Notification Form Required: Yes / No	EA Notification Form Reference:
Signed By Site Manager:	Date:

Document Reference: EM 03-003
Issue Number: 2
Issue Date: 28.07.22

Date of assessment		Nature of Operations on site		
Refer to Odour and Noise Monitoring plan detailing monitoring points. Mark any further assessment points and detail reason				
Location	Time	Intensity (1-5)	Extent (1-5)	Nature of odour / source
Where odour intensity of 4 or above detected, inform management & use incident & corrective action report forms				
Weather conditions		Wind Direction (e.g. from North)		
Cloud Cover		Wind Speed (Beaufort scale)		

Odour Intensity		Extent of the Odour	
1	No detectable odour.	1	Local and transient (only detectable on the installation or within the installation boundary during brief periods when wind drops or blows).
2	Faint odour (barely detectable, need to stand still and inhale facing into the wind).	2	Transient as above, but detected outside of the boundary.
3	Moderate odour (odour easily detected while walking and breathing normally).	3	Persistent but fairly localised.
4	Strong odour (strong but bearable).	4	Persistent and pervasive up to 50m outside the installation boundary.
5	Very strong odour (very offensive, possibly causing nausea, particularly if not accustomed to this odour).	5	Persistent and widespread (odour detected >50m from the boundary).

Beaufort Scale

Force	Description	Observation	km/hr
0	Calm	Smoke rises vertically	0
1	Light air	Direction of wind shown by smoke drift, but not wind vane	1-5
2	Light breeze	Wind felt on face; leaves rustle, ordinary vane moved by wind	6-11
3	Gentle breeze	Leaves and small twigs in constant motion	12-19
4	Moderate breeze	Raises dust and loose paper; small branches are moved	20-29
5	Fresh breeze	Small trees in leaf begin to sway, small branches are moved	30-39
6	Strong breeze	Large branches in motion; umbrellas used with difficulty	40-50
7	Near gale	Whole trees in motion; pressure felt when walking against wind	51-61


Refer to Incident and Corrective Action Form

Ref: _____

Name: _____

Signed: _____

Issued By:	Page 1 of 1	Approved By:
Ellgia Ltd		Stephen Kent

	NOISE MONITORING FORM	
Document Reference: EM 03-004	Issue Number: 2	Issue Date: 28.07.22

Date of assessment		Nature of Operations on site	
Refer to Odour and Noise Monitoring Plan detailing monitoring points. Mark any further assessment points and detail reason			
Location	Time	Noise Volume (1-4)	Nature of noise (continuous, intermittent) / source / characteristics (humming, clangs, etc)
A			
B			
C			
D			
E			
Where noise level of 4 detected, inform management & use incident & corrective action report forms)			
Weather conditions		Wind Direction (e.g. from North)	
Cloud Cover		Wind Speed (Beaufort scale)	

- Noise Volume**
- 1 Inaudible.
 - 2 Barely audible
 - 3 Clearly audible
 - 4 Loud and intrusive.

Beaufort Scale

Force	Description	Observation	km/hr
0	Calm	Smoke rises vertically	0
1	Light air	Direction of wind shown by smoke drift, but not wind vane	1-5
2	Light breeze	Wind felt on face; leaves rustle, ordinary vane moved by wind	6-11
3	Gentle breeze	Leaves and small twigs in constant motion	12-19
4	Moderate breeze	Raises dust and loose paper; small branches are moved	20-29
5	Fresh breeze	Small trees in leaf begin to sway, small branches are moved	30-39
6	Strong breeze	Large branches in motion; umbrellas used with difficulty	40-50
7	Near gale	Whole trees in motion; pressure felt when walking against wind	51-61


Refer to Incident and Corrective Action Form

Ref:

Name:

Signed:

Issued By:	Page 1 of 1	Approved By:
Ellgia Ltd		Stephen Kent

	UNDERGROUND VESSEL INSPECTION FORM	
Document Reference: EM 03-005	Issue Number: 2	Issue Date: 28.07.22

Test procedure:

1. Ensure no operations are occurring for the duration of the test that could impact on the vessel (i.e. could any discharges to the vessel occur during the test?)
2. Ensure vessel is empty;
3. Inspect with CCTV equipment.

Vessel Number ¹	Define what the vessel is used for.	Comments / Losses
Interceptor	Control Discharge of Yard Run Off	
Internal Run Off Tank	Leachate Collection	
Cess Pool Tank	Waste Water Collection	

Notes:

1. Refer to Bulk Storage Plan.
2. Where a test indicates a potential loss of integrity or that an incident may arise, provide details below and complete an incident/corrective action form.

Comments:

Refer to the Incident Report Form:

Ref:

Date:

Name:

Signed:

Issued By:	Page 1 of 1	Approved By:
Ellgia Ltd		Stephen Kent



DAILY SITE INSPECTION FORM

Document Reference: EM 03-006

Issue Number: 4

Issue Date: 28.07.22

Top Yard

Weather Condition -: am pm

Completed By:		Date:		Comments	Times	Times	Times	Times
Ref.	Jobs	Satisfactory ¹						
		Yes	No					
1.	Front of building clear and tidy							
2.	Entrance to building clear and material away from new walling							
3.	Mist air System fully operational							
4.	Workshop clear of obstacles /fire equipment in place/barrier around pit							
5.	Oil Bund at a low level and no barrel stored around bund, Area clean and tidy							
6.	Skip area checked and tidied				7.30	10.00	14.00	
7.	Skips at the skip area at a low level							
8.	Skip area clean and tidy with no item on the floor							
9.	Asbestos stored in lockable container, Tv, Fridges and WEEE waste stored in correct skips							
10.	Hazardous materials contained, i.e. batteries, tyres,							
11.	Truck wash clean and tidy							
12.	Tyre stored in correct skip and at a low level							
13.	Gas cylinder compound secure							
14.	Electric transformer shed secure							
15.	SRF area swept down and clear of any obstacles							
16.	Reclaimed materials contained and safe							
17.	SRF power units brushed down and fan units clear of dust							

Refer to the Incident Report Form:

Ref:

Date:

Name:

Signed:

Issued By:

Ellgia Ltd

Approved By:

Mike Harvey

Document Reference: EM 03-006

Issue Number: 4

Issue Date: 28.07.22

18.	SRF power units locked off							
19.	SRF Machinery Guarding in place and all locked off							
20.	Recycling bays clear							
21.	Site signs intact							
22.	Weighbridge clean and tidy							
23.	Mess room cleaned and tidy – fire equipment in place							
24.	Yard swept and free of dust							
25.	Entrance and access road clear of debris and litter							
26.	Litter picker deployed							
27.	Site clear of Litter							
28.	Fencing condition checked							
29.	Baler material at a low level							
30.	Blower bay empty and accessible							
31.	Baler area clean and tidy no oil drum stored							
32.	Bails stacked safely and in a designated area							
33.	Wheelie bin area clean and tidy							
34.	Water bowser deployed							

Notes:

- Where an answer indicates unsatisfactory, provide details below and complete an incident/corrective action form.

Refer to the Incident Report Form:

Ref:

Date:

Name:

Signed:

Issued By:

Ellgia Ltd

Approved By:

Mike Harvey

Document Reference: EM 03-006

Issue Number: 4

Issue Date: 28.07.22

BOTTOM YARD

Completed By:		Date:		Comments
Ref.	Jobs	Satisfactory ¹		
		Yes	No	
1.	Front of RDF building clear and tidy?			
2.	Inside RDF building clear of obstacles?			
3.	Building secure and locked?			
4.	Gates operational and locks in place?			
5.	PPE warnings in place and appropriate?			
6.	Any unlicensed materials?			
7.	Cardboard tidy and compact (if present)?			
8.	Wood tidy and debris free?			
9.	C&I Process secure and safe (if not in use)?			
10.	C&I Process clean and ready for operation?			
11.	Odours noticeable that could potentially impact on off-site receptors? ²			
Bins				
1.	Skips correctly stacked?			
2.	Any skips containing materials?			
3.	Any skips requiring repair?			
4.	Arranged in correct positions?			
5.	Hard standing free of debris?			

Notes:

- Where an answer indicates unsatisfactory, provide details below and complete an incident/corrective action form.
- Where an answer indicates that there is the potential for odours to impact on off-site receptors, provide details above and follow the Odour Assessment Procedure.

Refer to the Incident Report Form:

Ref:

Date:

Name:

Signed:

Issued By:	Page 3 of 3	Approved By:
Ellgia Ltd		Mike Harvey

Document Reference: EM 03-007

Issue Number: 2

Issue Date: 28.07.22

Members of Staff Undertaking the Inspection:

Date Inspection Undertaken:

Where an answer indicates unsatisfactory, provide details below and complete an incident/corrective action form.

Lighting	Request Attention	Satisfactory	Notes / Comments
Site Lighting			
MRF Lighting			
Office External Lights			
Office Internal Lights			
Mess Room Internal Lights			
SRF Building	Request Attention	Satisfactory	Notes / Comments
RDF Building	Request Attention	Satisfactory	Notes /Comments
Rejected Waste Area	Request Attention	Satisfactory	Notes / Comments
Containers Enclosed:			
a) Asbestos			
b) Batteries			
c) Gas Cylinders			
d) WEEE Product			
Low level of rejected waste:			

Document Reference: EM 03-007

Issue Number: 2

Issue Date: 28.07.22

a) Asbestos			
b) Batteries			
c) Gas Cylinders			
d) Tyres			
e) VDUs / TVs			
f) Refrigerators			
g) WEEE Product			
Area Clear of Debris?			
Workshop	Request Attention	Satisfactory	Notes / Comments
Safe, Clean & Tidy?			
Pit Barrier in Place?			
Rear Yard	Request Attention	Satisfactory	Notes / Comments
Area aside of workshop orderly arranged?			
Equipment in place and in working order?			
Debris / scrap skips in place and empty?			
Area beneath Trommel clear of debris?			
Machine Parking Area	Request Attention	Satisfactory	Notes / Comments
Scrap Store Orderly?			
Plant Orderly Arranged?			
Hard Surfacing / Drainage?	Request Attention	Satisfactory	Notes / Comments
Hard Surfacing Unbroken / Clear of Debris?			
Drainage Structures Gully / Manhole Cover in Place?			
Any Blockages / Silling			
Outfalls Clear?			
Drainage Checks	Request Attention	Satisfactory	Notes / Comments
Interceptor Check Level			
Gully Cover			

Issued By:

Ellgia Ltd

Approved By:

Mike Harvey

Document Reference: EM 03-007

Issue Number: 2

Issue Date: 28.07.22

Gutter / Downpipes			
Middle Yard	Request Attention	Satisfactory	Notes / Comments
Perimeter Road Clear of Debris and Accessible?			
Finds from Screens at Low Levels?			
Skips Containing Materials at Low Levels?			
Heaps Tidy?			
a) Soil?			
b) Stones?			
c) Rubble?			
Bottom Yard	Request Attention	Satisfactory	Notes / Comments
Road Tidy Clear of Debris and Accessible?			
Pallet Stack at a Minimum			
Heaps Tidy?			
a) Wood			
b) Soil			
c) PVC			
Plant Secure and Orderly?			
Bailer	Request Attention	Satisfactory	Notes / Comments
Baler Guards in Place?			
Baler working safely?			
Bails Stacked Correct?			
Area around baler clear of debris?			

Refer to the Incident Report Form:

Ref:

Date:

Name:

Signed

Issued By:

Ellgia Ltd

Approved By:

Mike Harvey

	SITE WEEKLY INSPECTION FORM	
Document Reference: EM 03-007	Issue Number: 2	Issue Date: 28.07.22

Bund and Tanks ¹	Is skin / bund sound and not leaking? ²	Is skin / bund overfull or showing signs of previous overfilling?	Are pipes sound and not leaking? ³	Are tanks sound and not leaking?	Are there drips and spills near un/loading area?	All tank / pipes valves locked?
Diesel and Gas Oil Tank	Y / N	Y / N	Y / N	Y / N	Y / N	Y / N
Hydraulic Oil	Y / N	Y / N	Y / N	Y / N	Y / N	Y / N
Waste Oil	Y / N	Y / N	Y / N	Y / N	Y / N	Y / N
Engine Oil	Y / N	Y / N	Y / N	Y / N	Y / N	Y / N
Bailer Fuel Tank	Y / N	Y / N	Y / N	Y / N	Y / N	Y / N
Trommel Fuel Tanks	Y / N	Y / N	Y / N	Y / N	Y / N	Y / N

Notes:

1. Refer to Bulk Storage Plan.
2. Consider condition of internal bund lining, external bund wall, presence of cracks or holes. Any rainwater valves should be closed and locked.
3. Pipes include all feed and discharge lines to and from the tanks. Look for signs of corrosion or damage. Where applicable fill and discharge pipes should be locked.
4. Where the answer to question 2 is due to rainwater within the bund, note this in the comments box below. A visual inspection to ensure no contaminants are visible on the water surface is required prior to pumping the water to drains. The matter does not require an incident / corrective action form to be completed.
5. Where an answer indicates a potential loss of integrity or that an incident may arise, provide details below and complete an incident/corrective action form.

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Ellgia Ltd		Mike Harvey



DOCUMENT CONTROL UPDATE FORM

Document Reference: BW EM 03-008

Issue Number: 2

Issue Date: 28.07.22

Document			Revision Date	All Obsolete Controlled Documents Returned ¹	Nature of / Reason for Revision (including page number / section)	New Version Number Issued	Signed	Date of Re Issue
Ref.	Name	Version						

Note:

Controlled Copies of EMS documents are held in the following locations:

- Site Office.

Issued By:

Ellgia Ltd

Page 1 of 1

Approved By:

Mike Harvey

Units of measurement used in information supplied under Part A and B requirements shall be appropriate to the circumstances of the emission. Where appropriate, a comparison should be made of actual emissions and authorised emission limits.

If any information is considered commercially confidential, it should be separated from non-confidential information, supplied on a separate sheet and accompanied by an application for commercial confidentiality under the provisions of the Environmental Permitting Regulations.

Part A

Permit Number	
Name of operator	
Location of Installation	
Time and date of the detection	

(a) Notification requirements for any malfunction, breakdown or failure of equipment or techniques, accident, or fugitive emission 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	
Substances(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 breach of a limit
To be notified within 24 hours of detection unless otherwise specified below

Emission point reference/ source	
Parameter(s)	
Limit	
Measured value and uncertainty	
Date and time of monitoring	
Measures taken, or intended to be taken, to stop the emission	

Document Reference: EM 04-001
Issue Number: 2
Issue Date: 28.07.22

Time periods for notification following detection of a breach of a limit	
Parameter	Notification period

(c) 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	
Substances(s) detected	
Concentrations of substances detected	
Date of monitoring/sampling	

Part B - to be submitted as soon as practicable

Any more 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 installation in the preceding 24 months.	

Name	
Post	
Signature	
Date	

Emergency Contact Listing

Name (of Service)	Address / Contact	Telephone No.
Ambulance	Switch Board	999
Fire and Rescue Service	Switch Board	999
	Non - Emergency	01724 295 920
Police	Switch Board	999
	Non - Emergency	01724 282 888
Environment Agency	Switch Board	08708 506 506 (Mon – Fri 8am – 6pm)
	Switch Board	0800 807060 (24 Hours)
Environmental Permit Officer	Owsten Ferry Office	01427 816 420
Site Manager	Steve Kent	07801 913 670
Operations Manager	Simon Roberts	07918 735 815
Northern Powergrid	Electricity Supply	0800 375 675
Water Company	Anglian Water	08457 145145
HSE	Helpline	0845 300 99 23
BOC Gases – Site Manager	Howard Wilson	01724 860 434
Waste Disposal Contractors	Contact Site Management	
Hazardous Waste Disposal Contractors	Contact Site Management	

Waste Vessel Schedule						
Plan Ref ¹	Yard Skip No.	Material	Internal or External Storage I/E	Max Volume on Site ²	Vessel Condition	Comments:
W1	9	Asbestos	E	40 cubic yard container	Good	
W2		Batteries	E	Pallet Box Stillage	Good	Contractors Storage Vessel
W3		Gas Cylinders	E	Cage / 20 Bottles	Good	
W4		Oil Rags	E	Drums 205 l, Bins 180 l	Good	
W5		Paint tins	E	3 cubic yard skip	Good	
W6	11	WEE	E	8 cubic yard skip	Good	
W7	8	Fridges & Freezers	E	40 cubic yard container	Good	
W8	7	Televisions	E	40 cubic yard container	Good	
W9		Fluorescent tubes	E	Coffin	Good	

1. See Bulk Storage Plan (FPP updated version)
2. Anticipated volumes held on site at any one time / size of containers. Where the material is held within a vessel, the figure quoted represents the maximum vessel capacity.
3. Skips provided for quarantined waste as necessary. Skips will be inspected prior to storing waste to ensure they are fit for purpose.

Issued By:	Page 1 of 1	Approved By:
Ellgia Ltd		Stephen Kent

Storage Areas								
Plan Ref ¹	Material	Internal or External Storage I/E	Max Volume on Site ² (Litres)	Bund Y/N	Pipe work (Above (a) / below (b) ground)	Tank/ Vessel Condition	Bund Condition	Comments: Alarms; Level Indicators; Sight glass, Heated tanks; Insulated Tanks
Fuels - AST								
T1	Diesel	E	27,000 l	Y	A	Good	Good	Visual and audible level alarm.
	Diesel	E	13, 000 l	Y	A	Good	Good	Visual and audible level alarm.
T2	Hydraulic Oil	E	1,200 l	Y	N / A	Good	Good	Sight Glass
	Waste Oil	E	1,200 l	Y	N / A	Good	Good	Level Checked with dip stick.
	Engine Oil	E	1,200 l	Y	N / A	Good	Good	Sight Glass
Other								
T3	Interceptor	E	-	N / A	B	Good	N / A	Underground Storage
T4	Internal Run Off Tank	I	24,000l	N / A	B	Good	N / A	Underground Storage
T5	Cess Pool	E	36,000l	N / A	B	Good	N / A	Underground Storage
Chemicals								
T6	Maintenance Oil and Chemical Store	I	N / A	N / A	N / A	N / A	N / A	Stored within an internal building acting as secondary containment.

Notes

1. See Bulk Storage Plan;
2. Anticipated volumes held on site at any one time. Where the material is held within a tank, the figure quoted represents the maximum tank capacity;
3. AST - Above Ground Storage Tank.

Comments:

Will be superseded by FPP storage plan and layout when approved

Issued By:

Ellgia Ltd

Approved By:

Stephen Kent

Note: The list purely focuses on operational and abatement related items and processes. Static items such as bulk storage facilities, secondary containment and drainage systems have been dealt with by the Fugitive Emissions Monitoring Programme.

Identification of key plant and equipment is reported in the Planned Preventative Maintenance Review.

Plant	Potential Failure	Consequences	Planned Preventative Maintenance	Schedule for Planned Preventative Maintenance
Site Vehicles	Vehicles operating out of specification.	Potential for increased noise emissions from site vehicle operation / movement.	Minimum PPM of equipment based on manufacturers recommendations.	As detailed on the computer based system.
Cleaning Systems	Failure of Vehicle Wash System	Potential for increased odour emissions from the vehicle wash area.	Minimum PPM of equipment based on manufacturers recommendations.	As detailed on the computer based system.
Waste Treatment Systems	Trommel Screen Failure.	Potential to send waste off site outside customer requirements.	Minimum PPM of equipment based on manufacturers recommendations.	As detailed on the computer based system.
	Trommel operating out of specification.	Potential for increased noise emissions from moving / vibrating parts.	Minimum PPM of equipment based on manufacturers recommendations.	As detailed on the computer based system.
	Shredder Failure	Potential to send waste off site outside customer requirements.	Minimum PPM of equipment based on manufacturers recommendations.	As detailed on the computer based system.
	Shredder operating out of specification	Potential for increased noise emissions from moving / vibrating parts.	Minimum PPM of equipment based on manufacturers recommendations.	As detailed on the computer based system.
	Biomass Failure	Potential to send waste to an alternative on site treatment outside	Minimum PPM of equipment based on manufacturers	As detailed on the computer based system.

Document Reference: EM 05-004

Issue Number: 2

Issue Date: 28.07.22

Plant	Potential Failure	Consequences	Planned Preventative Maintenance	Schedule for Planned Preventative Maintenance
		customer requirements.	recommendations.	
	Biomass operating out of specification	Potential for increased noise emissions from moving / vibrating parts.	Minimum PPM of equipment based on manufacturers recommendations.	As detailed on the computer based system.

Issued By:

Ellgia Ltd

Approved By:

Stephen Kent

Document Reference: EM 05-005

Issue Number: 2

Issue Date: 28.07.22

Monitoring Form	Frequency
Odour Assessment Form	When an odour complaint arises or activities on site give due cause for concern.
Underground Vessel Inspection Form	Annually
Daily Walk Round Inspection	Daily
Weekly Walk Round Inspection	Weekly
Noise Assessment Form	When a noise complaint arises or activities on site give due cause for concern.

The Table below details the identified sensitive receptors for the **Top Site** within a 2 kilometre radius (unless otherwise specified) of the facility. Only the closest receptor in each direction is listed. The EMS Sensitive Receptor Plans show the location of the receptors in line with the plan reference given below.

Nature of Receptor		Direction	Approximate Distance from Emission Points Associated with the Process ³	Plan Reference
Residential*		NNE	1.6 km	1
		S	960 metres	2
		W	750 metres	3
		NW	1 km	4
Hospitals*		SW	2 km	5
Educational*		NNE	1.7 km	6
		SW	900 metres	7
		W	1 km	8
Industrial / Commercial / Offices*		N	300 metres	9
		E	1 km	10
		S	20 metres	11
		W	25 metres	12
Nature Conservation ⁵	Sawcliffe LNR	NNE	750 metres	13
	Atkinson's Warren LNR	W	1.65 km	14
	Risby Warren SSSI	NE	1.6 km	15
Water Resources – Surface Waters		N	15 metres	16
		E	15 metres	16
		S	25 metres	17
		W	155 metres	18
Water Resources – Groundwater ¹		Site is not located within a Groundwater Source Protection Zone. It is anticipated the underlying geology will have a variable permeability.		
Highways and Transportation ²		S	Adjacent	19
		W	Adjacent	20
Air Quality Management Zone ⁴		Site lies within the Scunthorpe Air Quality Management Zone for breaches of the daily objective for PM10s.		

*: Closest receptor identified;

1: Groundwater Source Protection Zones identified using the 'What's in your backyard' section of the Environment Agency's website. Geology outlined using the Envirocheck Report Geology 1:50,000 Maps

2: Closest local road network only;

3 Distance shown measured using Ordnance Survey data provided by Promap;

4 Air Quality Management Zone data assessed using www.airquality.co.uk/archive/laqm/laqm.php

5 Nature and Conservation receptors established through the MAGIC and Nature on the Map websites

The Table below details the identified sensitive receptors for the **Bottom Site** within a 2 kilometre radius (unless otherwise specified) of the facility. Only the closest receptor in each direction is listed. The EMS Sensitive Receptor Plans show the location of the receptors in line with the plan reference given below.

Nature of Receptor		Direction	Approximate Distance from Emission Points Associated with the Process ³	Plan Reference
Residential*		NNE	1.9 km	1
		S	720 metres	2
		W	685 metres	3
		NW	1.1 km	4
Hospitals*		SW	1.9 km	5
Educational*		NNE	2 km	6
		SW	640 metres	7
		W	915 km	8
Industrial / Commercial / Offices*		N	Adjacent	9
		E	1.1 km	10
		S	80 metres	11
		W	20 metres	12
Nature Conservation ⁵	Sawcliffe LNR	NNE	1 km	13
	Atkinson's Warren LNR	W	1.6 km	14
	Risby Warren SSSI	NE	1.85 km	15
Water Resources – Surface Waters	Surface waters are present within the proposed site boundary. Dykes are present to the East, South and West and a pond is present on the North East corner of the site.			
		N	Adjacent	16
		E	30 metres	17
		S	60 metres	18
		W	190 metres	19
Water Resources – Groundwater ¹		Site is not located within a Groundwater Source Protection Zone. It is anticipated the underlying geology will have a variable permeability.		
Highways and Transportation ²		N	100 metres	20
		W	Adjacent	21
Air Quality Management Zone ⁴		Site lies within the Scunthorpe Air Quality Management Zone for breaches of the daily objective for PM10s		

Notes:

*: Closest receptor identified;

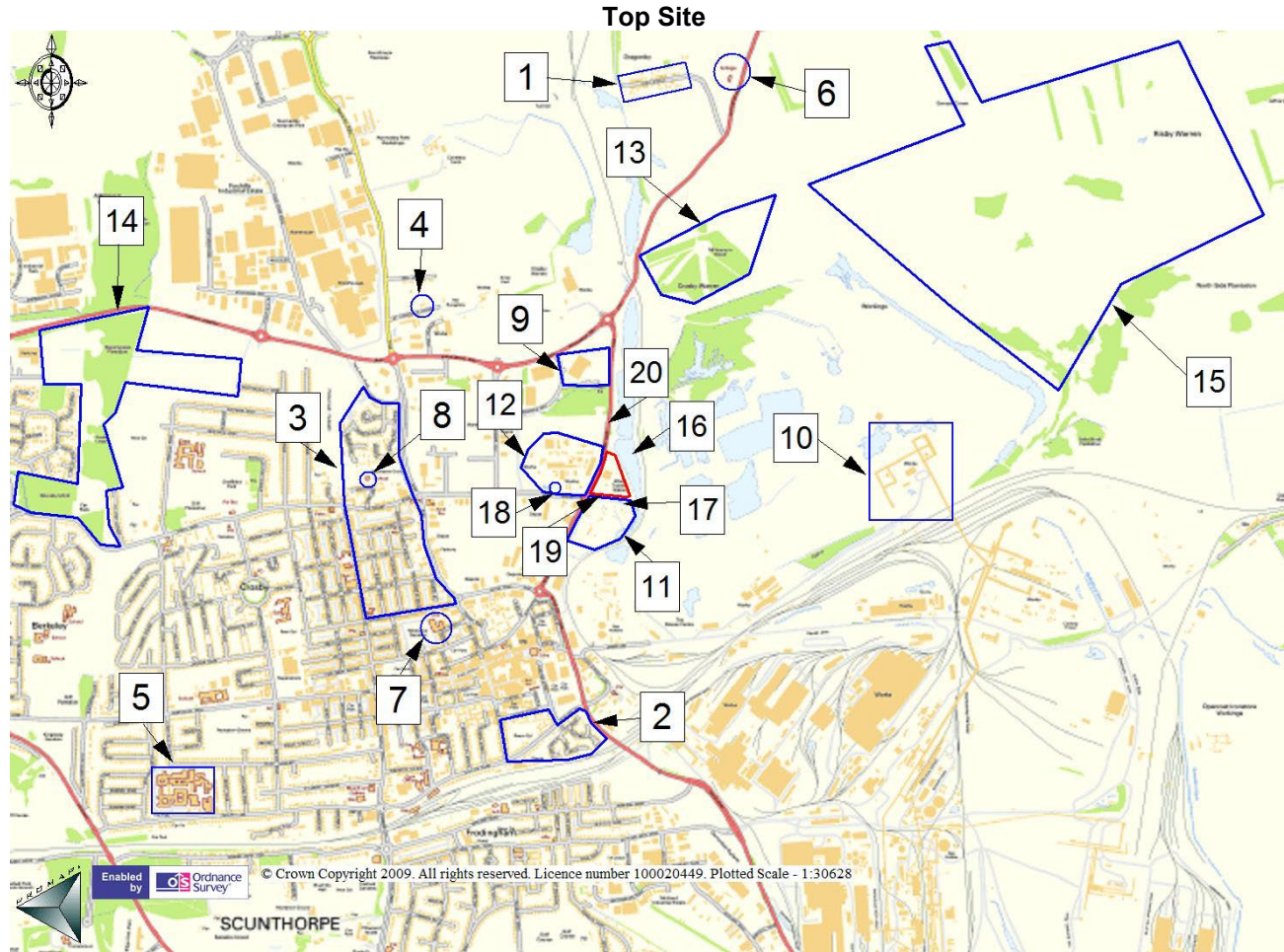
1: Groundwater Source Protection Zones identified using the 'What's in your backyard' section of the Environment Agency's website. Geology outlined using the Envirocheck Report Geology 1:50,000 Maps

2: Closest local road network only;

3 Distance shown measured using Ordnance Survey data provided by Promap;

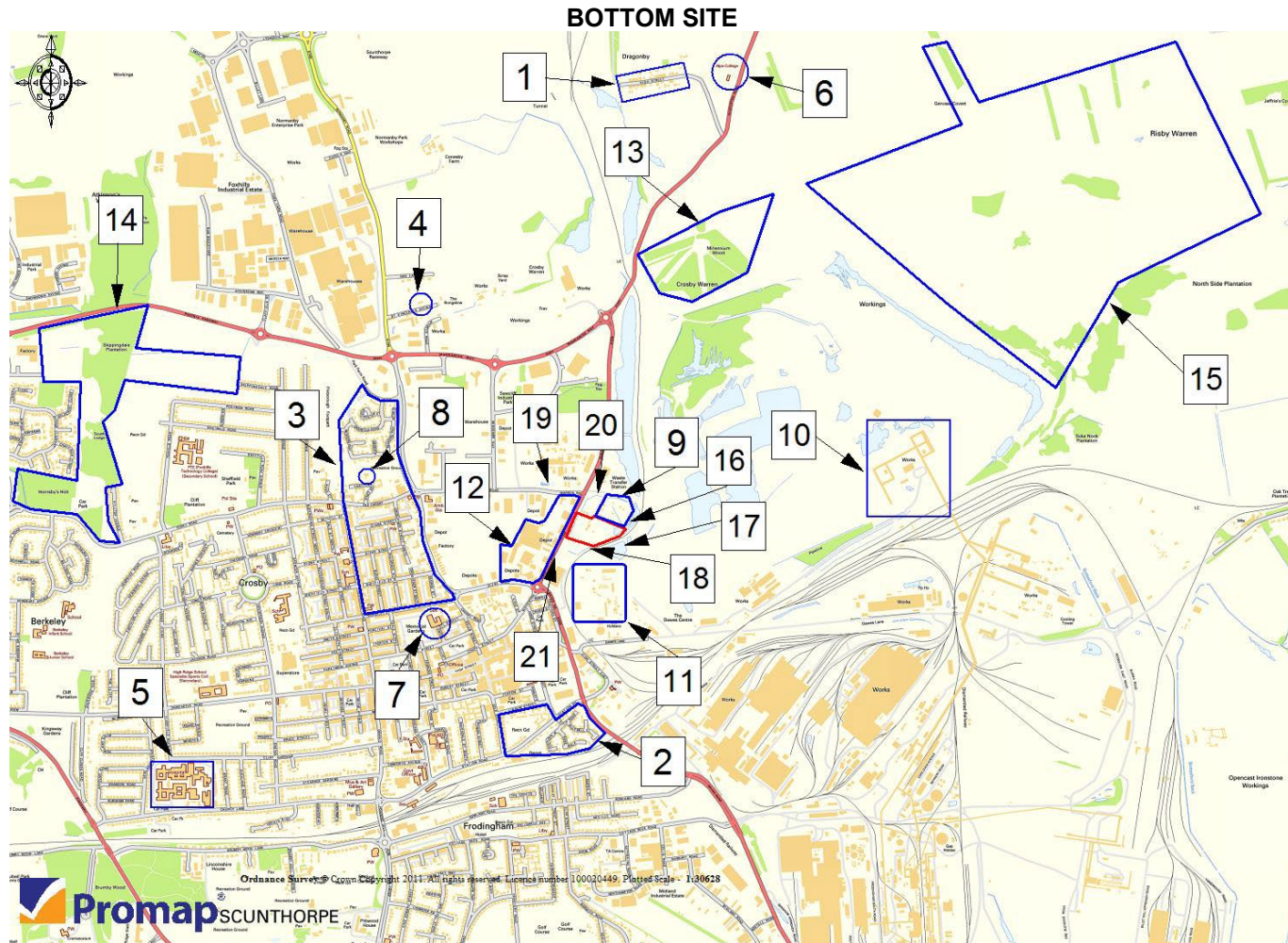
4 Air Quality Management Zone data assessed using http://aqma.defra.gov.uk/images/aqma_maps/Scunthorpe.pdf

5 Nature and Conservation receptors established through the MAGIC and Nature on the Map websites



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Engreen Environmental		Stephen Kent



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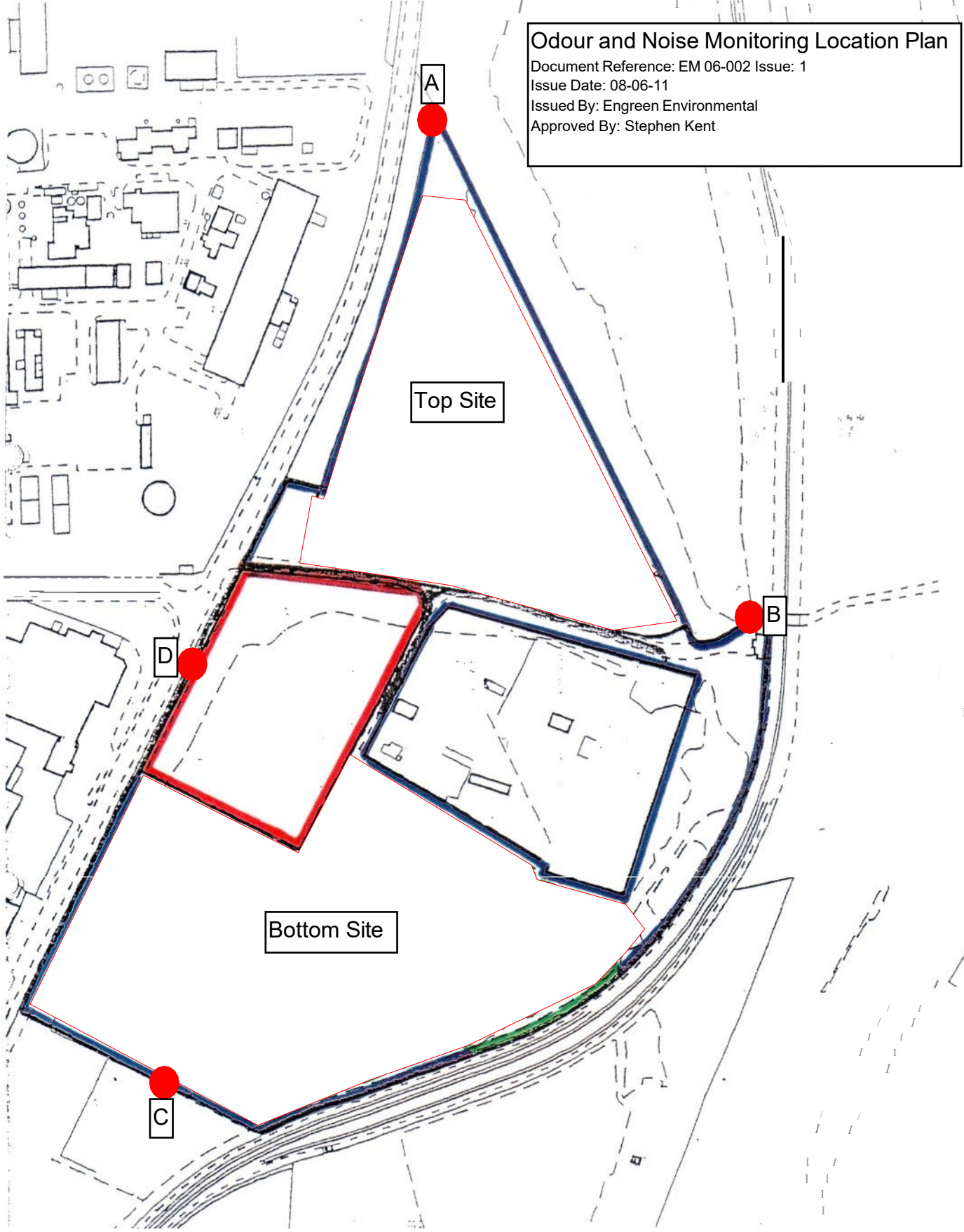
Odour and Noise Monitoring Location Plan

Document Reference: EM 06-002 Issue: 1

Issue Date: 08-06-11

Issued By: Engreen Environmental

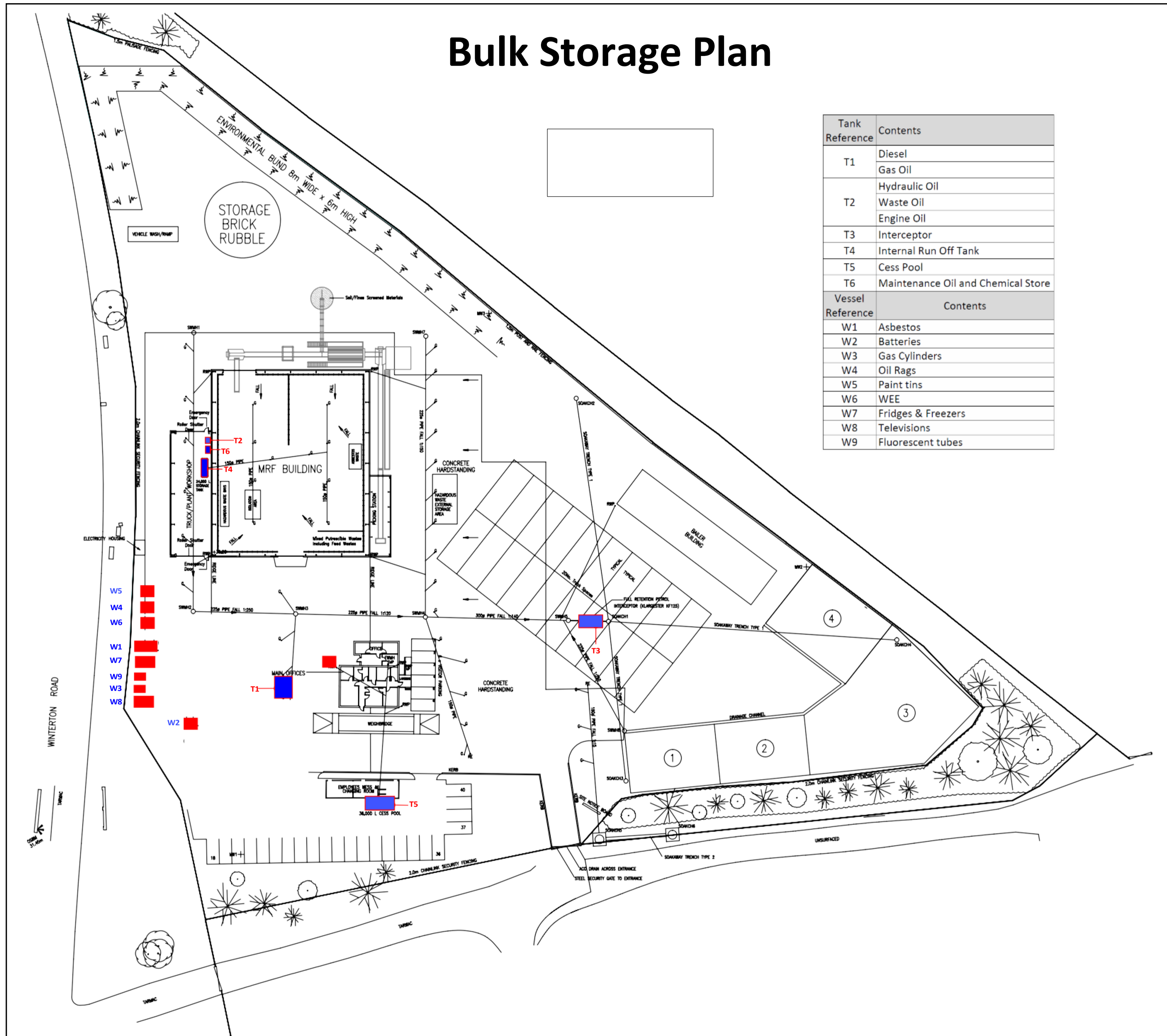
Approved By: Stephen Kent



Bulk Storage Plan

Legend

Tank Reference	Contents
T1	Diesel Gas Oil
T2	Hydraulic Oil Waste Oil Engine Oil
T3	Interceptor
T4	Internal Run Off Tank
T5	Cess Pool
T6	Maintenance Oil and Chemical Store
Vessel Reference	Contents
W1	Asbestos
W2	Batteries
W3	Gas Cylinders
W4	Oil Rags
W5	Paint tins
W6	WEE
W7	Fridges & Freezers
W8	Televisions
W9	Fluorescent tubes



Introduction

The aim of this training aid is to ensure that all relevant staff are aware of the environmental law that affects the site and their responsibilities under that law.

The site is subject to the Environmental Permitting Regulations (England and Wales) 2010. In order to meet the requirements of the regulations the company has had to assess its impacts on the environment and describe how it will limit these impacts. This includes:

- Wastes accepted on to the sites;
- Emissions to air, land and water;
- Noise, vibration and heat;
- Accident prevention;
- The condition of the sites.

The company has applied for and received an environmental Permit to operate. This environmental Permit has certain conditions attached to its issue. One of these is that all relevant staff are aware of the environmental Permit and their responsibilities under the environmental Permit.

Your Responsibilities

In order to make staff aware of their responsibilities and meet the condition outlined above, the site has developed and is continuing to develop an Environmental Management System (EMS). If the conditions set out in the permit are not complied with the Regulator has the power to stop operations at the site. Individuals and the company can be prosecuted. Conviction in a Magistrate's Court can bring fines up to £50,000 per offence and / or 12 months imprisonment. For more serious offences conviction in a Crown Court can lead to unlimited fines and / or up to 5 years imprisonment.

As members of staff you need to:

- Be acquainted with the environmental Permit and attached conditions;
- Be acquainted with the Emergency Procedure and the Incident and Near Miss Procedure;
- Be acquainted with all other Environmental Procedures you have received training for;
- Be acquainted with the reporting structure, detailed within this document.

You must report to a supervisor or member of site management:

- Any near misses, accidents or emergency incidents;
- Any leaks, spillages or defects in site equipment;
- Any other abnormality, for example strong odours emanating from site.

By reporting such events this contributes to ensuring that measures can be taken to prevent any potential reoccurrence.

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Ellgia Ltd		Stephen Kent

All EMS documents have a reference list at the end of the document which lists the EMS reference number for each related EMS document that is related to and / or is referenced within the document.

The Facility

The nature of the work undertaken at the sites leads to waste being accepted, stored, processed and dispatched. Waste has to be dealt with within the law as set out by the environmental Permit.

Waste

The site accepts, stores and processes waste prior to dispatch for which the site has a Duty of Care by law to ensure that they are handled safely, disposed in a compliant manner and any risk to the environment from waste is minimised.

As a business we have a duty of care to ensure all wastes:

- Are stored, handled, recycled and disposed of safely and legally;
- Appropriate licenses and permits are held on-site;
- Relevant contractors hold the relevant permits and licenses;
- Transfers are recorded on the relevant documents which are signed on site by all relevant parties.

Our duty of care has no time limit. It extends until the wastes have either been fully disposed of, or recovered.

Environmental Reporting Structure

Any near miss, accident and emergency must be reported via the appropriate reporting mechanism using the hierarchy outlined below. In most cases (unless unavailable) Mr John Churchill will review the relevant report and take responsibility for the corrective actions.

ELLGIA	TRAINING DOCUMENT - PERMIT	
Document Reference: EM 07-001	Issue Number: 1	Issue Date: 08.06.11

Environmental Reporting Structure

Issued By:	Page 3 of 3	Approved By:
Ellgia Ltd		Stephen Kent



ENVIRONMENTAL TRAINING RECORD

Document Reference: EM 07-002

Issue Number: 1

Issue Date: 08.06.11

EMS Reference	Title	Employee Sign	Trainer Sign	Date

'I confirm that I understand and will adhere to the Bell Waste Controls Environmental Policy and Procedures as outlined in my training'

Trainee:

Name:

Signed:

Date:

Training Checked and Verified by the Site Manager:

Name:

Signed:

Date:

All environmental training records will be stored in the Site Office.


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Stephen Kent

		TRAINING ASSESSMENT	
Document Reference: EM 07-003		Issue Number: 1	Issue Date: 08.06.11

The Training Assessment outlined in the tables below is used to characterise the Environmental Roles and Responsibilities at the installation. Table 1 provides a general overview of the main environmental roles and responsibilities; Table 2 provides specific operatives roles and responsibilities. Further to this The Environmental Training Awareness document is implemented on-site to ensure staff are aware of the:

- Regulatory implications of the Environmental Permit for the operations undertaken at the installation;
- Potential environmental effects of the operations undertaken at the installation;
- Need for reporting deviations from the Environmental Permit and actions to be taken in the event of an environmental emergency at the installation.

The Training Matrix outlines which environmental documents staff should be trained in and this is recorded on the Environmental Training Record.

Table 1: Main Environmental Roles and Responsibilities Matrix						
Personnel ↓	Overall Responsibilities	Day to Day Responsibilities	Monitoring	Inspections	EMS Procedures¹	Environmental Review and Reporting
Directors ↓	The Directors are ultimately responsible for all activities at the facility.					
Site Manager ↓	The Site Manager is ultimately responsible for all activities at the facility on a day to day basis. Responsible for the site complying with	Responsibilities include; <ul style="list-style-type: none"> • Practise all EMS procedures as appropriate; • Provide supervisory assistance to the process; • Deal appropriately with any incident or emergency situation; 	-	-	Ensure all relevant training for EMS Procedures is provided to appropriate staff. Ensure all relevant staff know their responsibilities as	Ensure all required environmental reporting to the regulator is up-to-date and all environmental reviews completed.

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Ellgia Ltd		Mike Harvey

Table 1: Main Environmental Roles and Responsibilities Matrix						
Personnel ↓	Overall Responsibilities	Day to Day Responsibilities	Monitoring	Inspections	EMS Procedures¹	Environmental Review and Reporting
	<p>all environmental legislation.</p> <p>Responsible for the facility's commitment to implementing and operating the Environmental Management System (EMS).</p>	<ul style="list-style-type: none"> • Liaise with Regulators and all other relevant parties as appropriate. 			part of the sites Duty of Care.	
Site Supervisors ↓	<p>Site Supervisors are responsible for the day to day running of the facility.</p> <p>Responsible for the site adhering to its Environmental Permit requirements.</p> <p>Ensuring the EMS is being implemented and operated on site.</p>	<p>Responsibilities include:</p> <ul style="list-style-type: none"> • Ensure all Permit and EMS monitoring and inspections are being carried out and recorded; • Ensure all waste documentation is being completed correctly; • Ensure all deliveries are supervised as appropriate; • Practise all EMS procedures. • Investigate any instance of environmental non-compliance; • Arrange for repairs and 	<p>Undertake any monitoring as required by the Site Manager, following appropriate training.</p> <p>Ensure all monitoring forms are completed accurately and to the correct time frequency.</p>	<p>Undertake any monitoring as required by the Site Manager, following appropriate training.</p> <p>Ensure all monitoring forms are completed accurately and to the correct</p>	<p>Implement and adhere to all EMS Procedures.</p> <p>Ensure all relevant staff receive the correct EMS Procedure training for their operations and to keep a record of this.</p> <p>Ensure all relevant staff know their responsibilities as</p>	<p>Complete all reviews of procedures and environmental records.</p> <p>Ensure that all waste contractors have the relevant licenses and permits and to keep copies of these on site.</p> <p>Ensure all Permit requirements are being submitted to</p>

Table 1: Main Environmental Roles and Responsibilities Matrix						
Personnel ↓	Overall Responsibilities	Day to Day Responsibilities	Monitoring	Inspections	EMS Procedures¹	Environmental Review and Reporting
	Responsible for the site adhering to its Duty of Care.	maintenance of relevant equipment. <ul style="list-style-type: none"> • Ensure all relevant records are held on site; • Deal appropriately with any incident or emergency situation; • Report any instances of environmental noncompliance to the Site Manager; • Liaise with Regulators and all other relevant parties as appropriate. 		time frequency.	part of the sites Duty of Care.	the Regulator. To report all instances of environmental failings, incidents, near-misses and emergencies to the Site Manager and record details on the relevant forms.
Operatives	To ensure environmental compliance at all times following all training and instructions given.	Responsibilities Include: Practise all EMS Procedures they are trained in. Report any instances of environmental non-compliance, incidents, near-misses and emergencies to their Supervisor or Site Manager.	When requested by their Supervisor or a Site Manager following appropriate training, complete relevant monitoring forms.	When requested by their Supervisor or a Site Manager, following appropriate training, complete relevant inspection forms.	Attend all relevant training events and inform their Supervisor or Site Manager on any uncertainties.	To report all instances of environmental failings to their Supervisor or a Site Manager.


	TRAINING ASSESSMENT	
Document Reference: EM 07-003	Issue Number: 1	Issue Date: 08.06.11

Table 1: Main Environmental Roles and Responsibilities Matrix						
Personnel ↓	Overall Responsibilities	Day to Day Responsibilities	Monitoring	Inspections	EMS Procedures ¹	Environmental Review and Reporting
Notes:						
1. All EMS Procedures are referenced within the System Index.						

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Elgia Ltd		Mike Harvey

Specified Operatives Environmental Roles and Responsibilities Matrix						
Operatives ↓	Overall Responsibilities	Day to Day Responsibilities	Monitoring	Inspections	EMS Procedures¹	Environmental Review and Reporting
Waste: Site Manager / Supervisors. Waste Operatives	To ensure compliance while undertaking waste related activities, at all times following all training and instructions given.	Responsibilities Include; <ul style="list-style-type: none"> • Ensure Waste Transfer and Consignment Notes are completed by all relevant parties; • Wastes are to be disposed of into the correct disposal vessels. 	Information will be recorded for all wastes: <ul style="list-style-type: none"> • The Waste Stream and its EWC Code; • Quantity of the waste stream; • Handling the waste stream safely; • Disposal route of the waste stream. 	Ensure that all Infrastructure Monitoring Programme (IMP) inspections are implemented and carried out according to the IMP Schedule. In the event of any non-conformities discovered during the IMP inspections or at any other time the incident and corrective action reporting structure will document this and action taken to rectify the non-conformity.	Procedures to be referred to throughout the process; <ul style="list-style-type: none"> • Waste Acceptance Procedure. • Waste Storage and Dispatch Procedure. 	Ensure that all waste contractors have the relevant licenses and permits and to keep copies of these on site. Ensure Waste Transfer Notes are kept for 2 years and Consignment notes 3 years.
Notes: 1. All EMS Procedures are referenced within the-System Index.						



TRAINING MATRIX

Document Reference: EM 07-004

Issue Number: 1

Issue Date: 08.06.11

Training Requirements	Directors	Site Manager	Site Supervisors	All Operatives
Waste Management Licenses / Environmental Permits	✓	✓	✓	✓
System Index	✓	✓	✓	✓
Environmental Policy	✓	✓	✓	✓
Fugitive Emissions Monitoring Programme	✓	✓	✓	-
Accident Management Plan	✓	✓	✓	-
Planned Preventative Maintenance Review	✓	✓	✓	-
Site Closure Plan	✓	✓	✓	-
Emergency Procedure	✓	✓	✓	✓
Incident and Near Miss Procedure	✓	✓	✓	✓
Waste Acceptance Procedure	✓	✓	✓	✓
Waste Storage Procedure	✓	✓	✓	✓
Odour Assessment Procedure	✓	✓	✓	✓
Fire Control Procedure	✓	✓	✓	✓
Spill Procedure	✓	✓	✓	✓
Delivery and Collection Procedure	✓	✓	✓	✓
Hazardous Substance Storage Procedure	✓	✓	✓	✓
New Projects Procedure	✓	✓	✓	-
Document Control Procedure	✓	✓	-	-

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Stephen Kent



TRAINING MATRIX

Document Reference: EM 07-004

Issue Number: 1

Issue Date: 08.06.11

Training Requirements	Directors	Site Manager	Site Supervisors	All Operatives
Complaints Procedure	✓	✓	✓	-
Noise Assessment Procedure	✓	✓	✓	-
Incident and Corrective Action Forms	✓	✓	✓	✓
Odour and Noise Monitoring Form	✓	✓	✓	✓
Document Control Update Form	✓	✓	-	-
Site Inspection Forms	✓	✓	✓	✓
Environment Agency Notification Form	✓	✓	-	-
Training Assessments	✓	✓	✓	-
Training Records	✓	✓	✓	-
Environmental Awareness Training	✓	✓	✓	✓
Emergency Contact List	✓	✓	✓	✓
Storage Schedules	✓	✓	✓	-
Planned Preventative Maintenance Schedule	✓	✓	✓	-
Inspection Schedule	✓	✓	✓	-
Sensitive Receptor Plans and Schedules	✓	✓	✓	-
Odour & Noise Monitoring Location Plans	✓	✓	✓	-
Bulk Storage Location Plans	✓	✓	✓	✓

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TRAINING MATRIX

Document Reference: EM 07-004

Issue Number: 1

Issue Date: 08.06.11

Training Requirements	Directors	Site Manager	Site Supervisors	All Operatives
Management System Reviews	✓	✓	-	-
FEMP Records	✓	✓	-	-
Odour Monitoring Records	✓	✓	-	-
Noise Monitoring Records	✓	✓	-	-
Site Closure Plan Records	✓	✓	-	-
Maintenance Records.	✓	✓	-	-
Document Control Update Records	✓	✓	-	-

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Stephen Kent