

Engreen Environmental Consultants Ltd.

Report Title: EMS Summary

Client: G.H. BY PRODUCTS
(DERBY) LIMITED

Issue Date: June 2019

**Report
Reference:** P171-R04-F1

Submitted to:

Environment Agency

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Report Issue History		
Report Number	Date	Comments
P171-R04-ID1	May 19	Internal Draft
P171-R04-D1	06/06/19	Draft for Client Review
P171-R04-F1	18/06/19	Finalised for Issue

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Appendix 1 –Environmental Management System

1 Environmental Management System

1.1 Introduction

A bespoke Environmental Management System (EMS) is currently in place for land spread operations under site's mobile plant Permit EPR/ GB3804KW. During Permit determination site management will continue development of this EMS to ensure that it covers the requirements of the new storage permit, include the relevant Permit application documentation and address any issues raised by the EA during the determination process. A copy of the current Environmental Management System including drafted elements to cover Permitted storage operations has been included in Appendix 1.

1.2 Environmental Management System Structure

The EMS contains a policy and procedures for environmental compliance and risk mitigation. The basis of the EMS will be implemented at Permit issue with continued development and a review of the EMS undertaken within 18 months of the permit issue date. The EMS will be reviewed at regular intervals to ensure continued compliance, implementation and effectiveness.

The EMS will be organised using the following structure:

- Index;
- System Documents and Management Plans;
- Environmental & Operating Procedures;
- Internal Monitoring and Recording Forms;
- External Report Forms;
- Environmental Training Documents;
- Schedules and Timetables;
- Plans and Drawings;
- Records.

The sections below provide more details as to the structure outlined above.

1.3 Management System Outline

1.3.1 Index, System Documents and Management Plans

This section of the systems contains the management plans that have been produced as part of the permitting process for the Environmental Permit and will form the core of the site's EMS. This section will for example contain the Environmental Accident Management Plan.

In line with permit requirements, the Environmental Accident Management Plan (EAMP) contains the following detail:

- Identification of the Hazards;
- Identification of the Risks
- Measures in place to reduce environmental risks from accidents;

In the event of an environmental accident on site resulting in impact on sensitive receptors, Site Management will:

- Instigate remedial action immediately;
- Promptly record the events and actions taken;

- Ensure the regulator is made aware without delay.

A draft copy of the Environmental Accident Management Plan can be found in document reference, EM01-004.

This site's Odour Management Plan (OMP) also sits in this Section of the EMS. In line with current guidance, the objectives for this OMP are:

- Identify all possible odour sources at the facility
- Outline the odour prevention control and mitigation measures employed on site;
- Ensure all operating conditions (normal, abnormal and emergency) are considered in evaluating the risk of odour release
- Commit to monitoring of odours emissions to be pro-active in preventing impact on receptors;
- Reduce the risk of odour releasing incidents or accidents by anticipating them and planning accordingly.
- Describe the contingency arrangements in place to prevent or react effectively to odour releases.

A draft copy of the Environmental Accident Management Plan can be found in document reference, EM01-003.

This section of the EMS will also include a Planned Preventative Maintenance management plan for environmentally critical items. The document will provide a key equipment list that will identify environmentally critical process and abatement equipment whose failure could impact on the environment. This will ensure that effective operational and maintenance systems are employed on all aspects of the site whose failure could impact on the environment.

The environmental policy will also be held within this section of the management system.

1.3.2 Environmental and Operating Procedures

All procedures developed as part of the assessment and control of environmental risk are stored in this section. This will include both the system and operational procedures. These procedures will include, but not be limited to:

- A Waste Acceptance / Collection Procedure for control of delivery and collection of wastes at site;
- Communication and Complaints Procedure that details how complaints will be dealt with including investigating, communicating reporting and implementation of appropriate actions;
- Procedure for investigating environmental incidents and near misses and identifying corrective actions;
- Procedure for dealing with spills and leaks.

Further detail with regards to these procedures has been detailed in Section 1.5 below.

1.3.3 Internal Monitoring & Recording Forms

All internal inspection forms developed in order to reduce the risk of items of equipment or process failures that have the potential to impact on the environment (including those developed as part of the Fugitive Emissions Management Plan) are stored in this section of the system. The section will include, but not be limited to, the following

- Incident & Corrective Action form;
- Infrastructure Inspection forms;

- EA report form.

1.3.4 External Reporting Forms

All external reporting forms will be stored in this folder. This will mainly focus on the reporting requirements of the Environmental Permit, once issued.

1.3.5 Environmental Training Documents

Each employee is given training commensurate with their work activity. Induction training covering basic environmental issues will be provided. All training records, assessments and training materials related to the Environmental Management System will be recorded. Training for all relevant staff will include:

- Awareness of regulatory implications of the Permit for the operation and how this relates to them;
- Awareness for the need for reporting deviations from the permit and who to report to;
- Actions to be taken to prevent and mitigate accidental emissions.

A training needs analysis will be carried out to identify specific training needs for key posts. This analysis will include contractors, where relevant, and those responsible for purchasing materials and equipment. As the EMS is developed, relevant staff will continue to be trained in the required elements, according to the training needs matrix.

1.3.6 Schedules and Timetables

Schedules and timetables will be held as part of the EMS and/or related systems (eg Maintenance systems). The schedules will include, but not be limited to, waste schedule and emergency contact lists.

1.3.7 Plans and Drawings

This element of the Environmental Management System will contain all relevant site plans and drawings referenced within the EMS. This will include the Site Boundary and the Sensitive Receptor Plan.

1.3.8 Records

This section of the EMS will contain all records that are required to be stored by the Environmental Permit such as those required by the Site Closure Plan and Fugitive Emissions Management Plan.

1.4 Management Structure and Responsibility

All staff will have clearly defined roles and responsibilities. The site will operate to an organogram implemented as part of the EMS and training requirements will reflect the various levels of responsibility. The organogram will be documented and made available to all staff members to clarify the extent of each level of employee's responsibility with regard to the control of the process and its environmental impacts.

Responsibility will be designated to a management representative for ensuring site operations are carried out in accordance with the Environmental Permit, to liaise with the Environment Agency as required and the liaise with the public with regard to complaints.

The potential environmental risks posed by the work of contractors will be assessed and instructions provided to contractors about protecting the environment while working on site.

1.5 EMS Summary

Table 1.1 below outlines the procedures and policies in place at the site to minimise the potential for environmental risk and form part of the Environmental Management System as summarised above.

Table 1.1 – EMS Summary	
Procedures / Policies Identified in ERA	Justification for Use to Minimise Environmental Risk
Emergency and Incident Procedures	These procedures will identify potential for and respond to environmental emergency and incident situations in order to prevent and mitigate the environmental impacts associated with emergency and incident situations.
Waste Acceptance Procedures	Procedures will be developed to control the deliveries of waste. These will ensure a pre acceptance check is carried out prior to waste being delivered to site and upon arrival to ensure the waste streams delivered comply with the permit.
Fugitive Emissions Monitoring	The site infrastructure monitoring programme provides a robust mechanism that ensures fugitive emissions of materials, including those that are potentially hazardous and those which could impact upon sensitive receptors are kept to a minimum.
Communication and Complaints System	Communication with regulatory authorities and environmental complaints from third parties is covered by this procedure so that the relevant corrective action can be undertaken in the event of a complaint. The system is designed to deal with environmental issues including odour and noise.
Spill Procedure	Control, mitigate, clean-up of spills and / or leaks of potentially hazardous materials on site to ensure they are cleaned up appropriately minimising potential impacts on the environment.
Planned Preventative Maintenance	Scheduling of maintenance of environmentally critical equipment will ensure it is maintained to prevent breakdown and minimise the potential for environmental incidents.

Appendices

Appendix 1 –Environmental Management System

GH By-Products (Derby) Ltd	System Index			
Environmental Management System				
Document Reference:	Issue No.	Issue Date:	Review Date:	Approved By:
EM 01-001	2	Draft	draft	Alan Asker

SYSTEM STRUCTURE

EM Section Reference:	Element:
00	Index
01	System Documents
02	Environmental & Operating Procedures
03	Internal Monitoring, Assessment & Recording Forms & Templates
04	External Report Forms & Templates
05	Records, Schedules and Timetables
06	Plans and Drawings
07	Environmental Training Documents
08	Records

Note: Documents within each sub-section are assigned a sequential number (e.g. EM01-xyz). All controlled EMS documents are stored in the Site Manager's office or electronically. Documents referenced other than "EM" are cross-referenced material from other systems.

INDEX

Number	Title	Version	Issue Date
EM 00	System Index	2	draft
EM 01-001	Environmental Policy	1	22.03.19
EM 01-002	Environmental Accident Management Plan	2	draft
EM 01-003	Land Spread Odour Management Plan	2	draft
EM 01-004	Organisation Structure and Responsibilities	1	22.03.19
EM 01-005	Fugitive Emissions Monitoring Programme	2	draft
EM 02-001	Overarching Procedure Requirements	1	22.03.19
EM 02-002	Emergency and Incident Procedure	1	22.03.19
EM 02-003	Spill Control Procedure	1	22.03.19
EM 02-004	Waste Acceptance Procedure	1	22.03.19
EM 02-005	Land Spread Procedure	1	22.03.19
EM 02-006	Drivers Field Manual	1	22.03.19
EM 02-007	Communication and Complaints Procedure	1	22.03.19
EM 02-008	Document Control Procedure	1	22.03.19
EM 02-009	Waste Procedure	1	22.03.19
EM 02-010	Odour Assessment Procedure	1	22.03.19

GH By-Products (Derby) Ltd	System Index			
Environmental Management System				
Document Reference:	Issue No.	Issue Date:	Review Date:	Approved By:
EM 01-001	2	Draft	draft	Alan Asker

Number	Title	Version	Issue Date
EM 02-011	Land Injection / Application Procedure	1	22.03.19
EM 02-012	Waste Delivery Procedure	1	22.03.19
EM 02-013	Waste Store Inventory Procedure	1	22.03.19
EM 03-001	Incident and Corrective Action Report Form	1	22.03.19
EM 03-002	Document Control Update Form	1	22.03.19
EM 03-003	Complaints Record	1	22.03.19
EM 03-004	Drivers Record Sheet	1	22.03.19
EM 03-005	Odour Monitoring Form	1	22.03.19
EM 03-006	Audit and Document Review Form	1	22.03.19
EM 03-007	Field Assessment Form	1	22.03.19
EM 03-008	Land Spread Inventory	1	22.03.19
EM 03-009	Waste Written Information Record	1	22.03.19
EM 03-010	Storage Vessel Inspection Form	1	22.03.19
EM 03-011	Deployment Schedule	1	22.03.19
EM 04-001	Environment Agency Notification Form	1	22.03.19
EM 04-002	Land Spread Report	1	22.03.19
EM 05-001	Emergency Contact List	1	22.03.19
EM 05-002			
EM 05-003	Waste Written Information Schedule	1	22.03.19
EM 05-004	Fugitive Emissions Monitoring Programme Schedule	1	22.03.19
EM 06-001			
EM 07-001	Training Matrix	1	22.03.19
EM 07-002	Training Records	1	22.03.19
EM 08-001	Permits and Waste Carriers Licence and Waste Exemptions	Records stored in the site office.	
EM 08-002	Environment Agency Notification Records	Records stored in the site office.	
EM 08-003	Quarterly Waste Return Records	Records stored in the site office.	
EM08-004	Document Control Update/ Audit Records / Obsolete EMS	Records stored in the site office.	

GH By-Products (Derby) Ltd	System Index			
Environmental Management System				
Document Reference:	Issue No.	Issue Date:	Review Date:	Approved By:
EM 01-001	2	Draft	draft	Alan Asker

Number	Title	Version	Issue Date
EM 08-005	Complaint Records		Records stored in the site office.
EM 08-006	Training Records		Records stored in the site office.
EM 08-007	Incident and Corrective Action Forms		Records stored in the site office.
EM 08-008	Landsread Inventory and Deployment Schedule Records		Records stored in the site office.
EM 08-009	Copies of Waste Carriers Licences/ EA Permit (Waste Suppliers)		Records stored in the site office.
EM 08-010	Store Vessel Completed Forms (EM03-010)		Records stored in the site office.
EM 08-011	EA CAR Reports and EA Correspondence		Records stored in the site office.
EM 08-012	New Store Construction Records		Records stored in the site office.

GH By-Products (Derby) Ltd	Environmental Policy			
Environmental Management System				
Document Reference:	Issue No.	Issue Date:	Review Date:	Approved By:
EM 01-001	1	22.03.19	22.03.20	Alan Asker

This Environmental Policy applies to the land spreading processes of GH By-Products (Derby) Ltd that are likely to have an impact on the environment.

GH By-Products (Derby) Ltd operates mobile plant, directly or with contractors, to recover waste materials to land as a fertiliser replacement. GH By-Products (Derby) Ltd is committed to minimising the effect of these processes on the environment.

It is our policy to:-

- Comply with all relevant environmental legislation and other requirements.
- Review the environmental risks associated with our processes and implement systems to ensure that these risks are minimised where feasible in order to prevent pollution.
- Implement a system of inspection, testing and maintenance to ensure that environmental risks continue to be controlled.
- Commit to monitor our impacts on the environment through a documented emissions monitoring regime.
- Ensure that staff are trained to be aware of the environmental risks identified and their roles in ensuring that these risks are minimised.
- Audit and review environmental performance to ensure the effectiveness of the EMS is maintained.

Director:	Date:
Operations Manager:	Date:

GH By-Products (Derby) Ltd	Environmental Accident Management Plan			
Environmental Management System				
Document Reference:	Issue No.	Issue Date:	Review Date:	Approved By:
EM 01-002	Draft	Draft	draft	Alan Asker

Purpose:

This Environmental Accident Management Plan (EAMP):

- o Outlines the methodology for accident identification;
- o Lists the accident scenarios identified;
- o Provides the control measures in place to mitigate the identified accident scenarios;
- o Lists the relevant controls and related EMS documents.

The EAMP documents will be reviewed and updated, when there have been major modifications to site operations or when there has been an environmental accident at the site.

Definitions:

Major Accident Scenario: Environmental accident scenarios that would result in a rapid response being required to deal with a situation arising on site.

Key Site Information:

- Full emergency contact list is available in the Site Office and as part of the EM 02-006 Drivers Field Manual.

Methodology:

For site operations, the potential for environmental accidents to occur has been evaluated and recorded in the following documents:

- Environment Agency's Standard Rules Permits: SR2010No4 'Generic risk assessment for standard rules set number SR2010No4 v4.0', for land spread operations:
- The Environmental Risk Assessment within the document referenced P171-R02-F1, for Permitted storage operations.

The risk assessment focus on the key environmental risk sources and assesses the potential for them to move via a defined pathway and to impact on an identified receptor.

Although all environmental residual risks are scored as low / insignificant within both assessments, scenarios that are considered 'major environmental accident scenarios' have been discussed in more detail below.

Hazardous Sources

The potential environmental hazard sources from site's waste storage and land spread operations have been identified below:

- The waste streams stored / to be spread to land;
- Fuels from delivery, dispatch and land spread vehicles.

Pathways

The pathways to identified receptors at risk from environmental pollution from major accident scenarios have been listed below;

1. Groundwater: - Any pollutants allowed to enter the underlying ground could enter groundwater and flow towards watercourses.

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2. Surface water: - Any pollutants that could be transferred via surface waters.
3. Atmosphere: - Any pollutants that could be transferred via the air (odours, dusts, noise) would travel in the direction of prevailing winds and potentially impact the closest human receptors in that direction.

Key Receptor Sensitivity:

Environmental pollutants released during an accident event should be prevented from leaving site. Release from site may impact on one of the following identified receptors.

- Residential;
- Ground and surface waters;
- Businesses / Industry.

Receptors are identified within the Environmental Risk Assessment P171-R02-F1 for Permitted Store operations and on the Field Assessment forms submitted with the deployment applications.

Identified major accident scenarios:

The scenarios below are those identified major environmental accident scenarios that would result in a rapid response being required to deal with a situation arising on site (e.g. fuels leaking from site vehicles) and to prevent uncontrolled release of material leaving site and potentially causing a pollution event.

The EAMP should be read in conjunction with the Fugitive Emissions Monitoring Programme (FEMP) which provides information on the measures taken to monitor and control potential accident scenarios to prevent emissions occurring.

Major environmental accident scenarios:

Table 2: Major environmental accident scenarios					Immediate actions required - also see further details in section below
Major risk source	Location	Accident scenario	Information, State & Hazard	Pathways & Receptors of concern	
Waste Material Delivery	Delivery routes.	Fuel leaks	Fuels liquid Flammable Tractors carry tanks for fuel.	<u>Pathways:</u> Ground and surface water. <u>Receptors:</u> Ground /groundwater. Surface water.	Follow Spill Procedure. Use spill kits to contain and clean up. Used absorbents should be placed into dedicated container / drum and marked "hazardous waste".
		Delivery trailer collision / and or failure leading to a major spill of waste materials / fuels.	Waste materials. Agronomist describes them as <i>'if this material was allowed to enter a watercourse it could result in a pollution event'</i> . Fuels liquid Flammable Tractors carry tanks for fuel.	<u>Pathways:</u> Ground and surface water. Atmosphere <u>Receptors:</u> Ground /groundwater. Surface water. Local residents / businesses	Follow Spill Procedure Use spill kits to contain and clean up where appropriate. Used absorbents should be placed into dedicated container / drum and marked "hazardous waste". If required, use Emergency Contact List to contact a chemical clean up contractor.

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Table 2: Major environmental accident scenarios					Immediate actions required - also see further details in section below
Major risk source	Location	Accident scenario	Information, State & Hazard	Pathways & Receptors of concern	
		Site vehicles catching fire.	Fuels liquid Flammable Tractors carry tanks for fuel.	<u>Pathways:</u> Ground and surface water. <u>Receptors:</u> Ground /groundwater. Surface water.	Use Emergency Contact List to contact emergency services.
Waste Storage	Permitted stores and / Storage Locations as specified in deployments.	Failure of storage tank/ lagoon and / or collection / delivery systems, leading to a major spill of waste materials. Failure of valves or pipework at base of tank – including deliberate vandalism or damage – leading to major spill of waste.	Waste materials. Agronomist describes them as <i>'if this material was allowed to enter a watercourse it could result in a pollution event'</i> .	<u>Pathways:</u> Ground and surface water. Atmosphere <u>Receptors:</u> Ground /groundwater. Surface water. Local residents / businesses	Follow Spill Procedure Use spill kits to contain and clean up where appropriate. Used absorbents should be placed into dedicated container / drum and marked "hazardous waste". If required, use Emergency Contact List to contact a chemical clean up contractor.

Pollution prevention site specifics:

- All Land Spread staff trained in land spread procedures;
- In remote locations FEMP defines additional security measures to minimise the risk of vandalism damage.

The following documents are to be used to mitigate against accidents and following their occurrence:-

- Fugitive Emissions Monitoring Programme
- Emergency and Incident Procedure;
- Emergency Contact List;
- Spill Control Procedures;
- EA Notification Form.

Summary of Key Actions in the event of an accident /emergency scenario (See EM 02-002 Emergency and Incident Procedure):

Actions:-

- Contact Environment Agency (0800 807060) and complete relevant permit notification form.
- Contact Senior Management.
- When required, inform Emergency Services.
- Where safe to do so:-
 - Prevent liquids, including fire water, from escaping into surface waters.

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- Complete Incident and Corrective Action Report Form and, where relevant and known, detail type, quantity, hazardous properties of materials that have caused the incident;
- Dispose of any waste materials created as a result of the accident in accordance with relevant legislation;
- Where relevant, provide for contingency measures for interim period whilst repairs are made;

Follow up actions:

Following any on site emergency, accident or significant near miss, the following will be undertaken:

- Replenish spills kits as required;
- Undertake site inspection of areas of the site affected and arrange for necessary repairs;
- Investigation into cause and how to prevent re-occurrence;
- Review of EAMP;
- Update any related documents as required.

This is the template OMP to be implemented at each farm / permitted storage site. Upon issue, the red text within this template will be updated to ensure the OMP is farm / store specific and issued to the Operations Manager to implement.

GH By-Products (Derby) Ltd	Land Spread Odour Management Plan			
Environmental Management System				
Document Reference:	Issue No.	Issue Date:	Review Date:	Approved By:
EM 01-003	draft	Draft	draft	Alan Asker

If you are in receipt of an odour complaint and / or site operations are giving rise to odour nuisance call the Operations Manager immediately - 07584351354

Purpose

This Odour Management Plan (OMP) has been designed to detail the methods employed as part of land spread operations, including monitoring and contingencies, to prevent, control and minimise odour pollution. This OMP is to be implemented at the sites listed in Table 1.1 below. The potential for odour pollution has been evaluated as part of the environmental risk assessments referenced in the table below.

Table 1.1 – Site Details			
Environmental Permit Reference	Farm / Store Reference	Environment Agency Permit Reference	Environmental Risk Assessment Reference
Add Permit Reference	Permitted Stores	N / A	P171-R02-F1 Environmental Risk Assessment

The intent of the OMP is to prevent odour emissions as far as practicable and where not to minimise emissions and impacts. In line with company policy the OMP based on general principles applicable to all deployments. This policy ensures that management techniques are applied consistently across all deployments. By basing the approach on prevention and minimisation from basic principles the OMP ensures that externalities (such as wind directions, weather inversions and the timing / presence of sensitive receptors) do not specifically influence the procedures. Rather the procedures are aimed at minimising potential pollution *under all conditions* and irrespective of these external factors. The OMP assesses odour release under all relevant circumstances and outlines the measures site undertakes to prevent and minimise odours in all working conditions.

Although the OMP is designed to minimise potential odour releases and impacts it should be recognised that there may be occasions when the controls are not fully effective and excessive odour is released which could impact on nearby receptors. In such circumstances the appropriate course of action is to stop the spreading / delivery operations and investigate the root cause of the odour impact. Spreading / delivery operations will be stopped in the following circumstances:

- An odour complaint which is verified by an officer of the Environment Agency is reported to the operator at the time of the odour being witnessed and it is apparent to the operator that existing control measures are not being effective;
- Odour monitoring by the company show unacceptable levels of off-site odour and it is apparent to the operator that existing control measures are not being effective.

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GH By-Products (Derby) Ltd	Land Spread Odour Management Plan			
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Following cessation of spreading operations the operator will carry out an investigation into the root cause and identify the available remedial options. Spreading / deliveries to stores will only restart after completion of an Incident and Corrective Action Form AND implementation of any remedial or additional control measures recommended by the investigation.

Management Plan Format

The structure of this management plan is as follows:

- *Source Materials Inventories (Table 2)* – Site personnel will use and update the inventories to identify potentially odorous materials stored on site, their storage location and designated storage time on site.
- *Odour Release Inventory and Key Procedures (Tables 3 and 4)* – Site personnel will refer to this inventory in the event of odours impacting on offsite receptors to employ the contingency measures detailed.

The inventory (Table 3) details:

- Potential odour releases from site under normal operation;
- The control measures employed by site to minimise the potential odour impacts from identified release sources;
- Abnormal scenarios leading to potential odour releases; and
- Contingency plans in the event of the above abnormal scenarios occurring.

A listing of key procedures (Table 4) is also provided justifying the procedures and policies in place to minimise the potential for odour generation from site.

- *Monitoring and Evaluation* – This section of the management plan provides reference to the odour monitoring undertaken at site and complaint procedures in place in the event of an odour complaint being received on site. Actual monitoring and complaint procedures are detailed within the EMS System Index.
- *Annex* – This section of the OMP includes all the EMS documentation listed in Table 4, to ensure this OMP can be treated as a standalone document as requested by the Environment Agency. If the OMP is site specific, relevant deployment application documents are also listed here.

Review

Site Management will ensure the effectiveness of this OMP is reviewed annually or when the following occurs:

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- A series of sustained complaints that have been linked by Site Management or the Regulator to deficiencies in this OMP;
- Significant change to site infrastructure or operating techniques, e.g. anything that requires a permit variation application to be made to the Environment Agency.
- Addition of a new store / farm where waste is stored under a deployment / permit.

Where the risks associated with odour impact upon sensitive receptors require improvements to on site controls, this will be dealt with through corrective action procedures that form part of the site's EMS.

Guidance

Table 1 outlines guidance documents that have been used to produce the Odour Management Plan. This Table will be updated as appropriate during every review to ensure the latest available Environment Agency guidance is consulted.

Table 1 – Guidance Documents		
Reference	Title	Document Issue Date / Version
EA Website	https://www.gov.uk/guidance/develop-a-management-system-environmental-permits	Published 1 st February 2016
EPR 8.01	How to comply with your landspreading permit	V 2 February 2013
H4	Odour Management	April 2011

Source Materials

Source materials are dependent on the waste streams stored and / or included within a deployment application. Table 2 below provides a generic description of the source materials that can be stored under site's permits and spread at the deployment sites. The EMS document EM 03-011 Deployment Schedule provides details as to all of the waste streams site potentially spreads to land and correlates these to the deployments under which they can be spread.

Table 2 – Source Materials Inventory					
Source	Description / Scope	Nature of odours – fresh material	Nature of odours – degraded material	Quantity of Material	Length of Time on Site ¹
*To be updated in line with accepted list of wastes detailed on Waste		See EM 03-011 Deployment Schedule for a detailed description of the waste streams		<ul style="list-style-type: none"> • c. 4500 m3 lagoon; • c.3800 m3 	Up to 18 months prior to spreading

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Table 2 – Source Materials Inventory					
Source	Description / Scope	Nature of odours – fresh material	Nature of odours – degraded material	Quantity of Material	Length of Time on Site ¹
Schedule*		that can be stored at permitted sites / spread at agreed deployment locations.		farm tank	
<ol style="list-style-type: none"> 1. See site and field plans associated to permitted stores and current live deployments applications for storage locations. Copies of the plans are held as part of the EMS. 2. Length of time on site is the expected norm and variation may occur under fault conditions. All reasonably foreseeable fault conditions have been dealt with in Table 3 below. 3. See Emergency Contact List for details of removal contractors for the above source materials. 					

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**If you are in receipt of an odour complaint and / or site operations are giving rise to odour nuisance call the Operations Manager immediately -
07584351354**

Odour Release Inventory

Notes:

1. For each Potential Odour Release Area, contingency measures for the identified scenarios are linked by numbers (e.g. Release scenario 1 is covered by contingency measure 1);
2. In the event of a suspected off-site impact, site personnel will carry out an odour assessment (as per the Odour Assessment Procedure in the EMS). Should this assessment show an off-site impact then the appropriate contingency measures will be implemented;
3. Where contingency measures are undertaken, site personnel will complete an Incident and Corrective Action Form;
4. Where procedures have been developed as part of the EMS, see Table 4 Listing of Key Procedures and their EMS references.

Table 3 – Odour Release Inventory				
Potential odour release area	Scope for potential odour release – normal conditions	Impact control measures adopted	Odour release scenarios – abnormal conditions	Contingency measures in event of listed release scenario occurring

This is the template OMP to be implemented at each farm / permitted storage site. Upon issue, the red text within this template will be updated to ensure the OMP is farm / store specific and issued to the Operations Manager to implement.

GH By-Products (Derby) Ltd		Land Spread Odour Management Plan		
Environmental Management System				
Document Reference:	Issue No.	Issue Date:	Review Date:	Approved By:
EM 01-003	draft	Draft	draft	Alan Asker

If you are in receipt of an odour complaint and / or site operations are giving rise to odour nuisance call the Operations Manager immediately -
07584351354

Table 3 – Odour Release Inventory				
Potential odour release area	Scope for potential odour release – normal conditions	Impact control measures adopted	Odour release scenarios – abnormal conditions	Contingency measures in event of listed release scenario occurring
Delivery to Site	Odour release from waste in transit.	Waste material delivered to site in enclosed tankers by trained drivers. Vehicles maintained under service contracts.	1. Spillage of waste material during delivery to site that is left to degrade.	1. Site will use Spill / Waste / procedures to clean up and dispose of spilt materials.

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Table 3 – Odour Release Inventory				
Potential odour release area	Scope for potential odour release – normal conditions	Impact control measures adopted	Odour release scenarios – abnormal conditions	Contingency measures in event of listed release scenario occurring
	Transfer from delivery tanker to storage facility.	Delivery undertaken by trained operatives following the EM 02-004 Waste Acceptance Procedure. Level gauges for level control to minimise potential for overfilling. Stores filled from the bottom to minimise disturbance. Odour monitoring of stores undertaken weekly during storage and at least daily when deliveries occur. If there are more than 4 deliveries in a day a second odour monitoring check will be carried out.	1. Spillage / overfilling of Waste material during transfer to storage tanks that is left to degrade.	1. Site will use Spill / Waste / procedures to clean up and dispose of spilt materials.

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Table 3 – Odour Release Inventory				
Potential odour release area	Scope for potential odour release – normal conditions	Impact control measures adopted	Odour release scenarios – abnormal conditions	Contingency measures in event of listed release scenario occurring
Storage	Odours from stored materials.	Stores strategically sited away from potential sensitive receptors. Stores inspected as part of Site Fugitive Emissions Monitoring Programme Stores covered	1. Abnormally hot weather conditions / failure of store covers leads to substantiated odour complaints from storage of waste streams.	1. Materials to be stopped being delivered to stores. Site Management will then decide the best option outlined below for dealing with the waste materials remaining on site: <ul style="list-style-type: none"> • All materials remaining on site to remain in storage facilities until conditions are favourable to recommence deliveries / operations, covers repaired / replaced; • All materials remaining in store to be spread to land in compliance with agreed deployments; • EA contacted to agree that materials can be moved to another site

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Table 3 – Odour Release Inventory				
Potential odour release area	Scope for potential odour release – normal conditions	Impact control measures adopted	Odour release scenarios – abnormal conditions	Contingency measures in event of listed release scenario occurring
				<p>covered by a suitable deployment / permit;</p> <ul style="list-style-type: none"> Materials to be removed from site and taken to a suitably licensed waste facility. <p>Actions taken will be noted on an Incident and Corrective Action Report Form and list the reasons why that action has been taken.</p> <p>Site Management will review weather conditions prior to recommencing land spread activities at any storage site.</p>
			1. Failure of storage containment and materials are left	1. Site will use Spill / Waste / procedures to clean up and dispose of spilt materials where this is practicable.

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Environmental Management System				
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Table 3 – Odour Release Inventory				
Potential odour release area	Scope for potential odour release – normal conditions	Impact control measures adopted	Odour release scenarios – abnormal conditions	Contingency measures in event of listed release scenario occurring
			to degrade	Materials to be removed from site and taken to a suitably licensed waste facility.
Land Application	Odours from land injecting / application process	Materials applied to land by trained operatives following the EM 02-011 Land Injection / Application Procedure.	1. Abnormally hot weather conditions leads to substantiated odour complaints from spreading operations.	1. Materials to be stopped being spread on fields linked to complaints. Site Management will then decide the best option outlined below for dealing with the waste materials remaining on site: - All materials remaining on site to remain in storage facilities until conditions are favourable to recommence spreading;

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Environmental Management System				
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Table 3 – Odour Release Inventory				
Potential odour release area	Scope for potential odour release – normal conditions	Impact control measures adopted	Odour release scenarios – abnormal conditions	Contingency measures in event of listed release scenario occurring
				<ul style="list-style-type: none"> - All materials remaining on site to be spread to land in compliance with the site permit; - Where possible, land will be cultivated within 24 hours (if spread on stubble) to mitigate the odour; - EA contacted to agree that materials can be moved to another site covered by a suitable deployment / permit; - Materials to be removed from site and taken to a suitably licensed waste facility. <p>Actions taken will be noted on an Incident</p>

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Table 3 – Odour Release Inventory				
Potential odour release area	Scope for potential odour release – normal conditions	Impact control measures adopted	Odour release scenarios – abnormal conditions	Contingency measures in event of listed release scenario occurring
				and Corrective Action Report Form and list the reasons why that action has been taken. Site Management will review weather conditions prior to recommencing land spread activities at the field / deployment site.
		Spreading not undertaken on waterlogged, frozen or snow covered ground.	1. Land unfit to receive the material.	1. If fields remain unfit to receive material over a prolonged period, other suitable fields will be identified. If no other fields can be found and there is no storage capacity at the waste producing site, Site staff will arrange for the waste stream to be recovered / disposed by another suitably licensed contractor.

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Key Procedures

Table 4 - Listing of Key Procedures		
EMS / Site Systems Reference	Procedures / Policies Identified in OMP	Justification for Use in Potential Odour Impact Area
EM 02-005 / EM 02-006 / EM 03-004	Land Spread Procedure, Drivers Field Manual and Drivers Record Sheet	Control the spreading of materials on to registered land by ensuring that inspections of spreading equipment and fields prior, during and after spreading is undertaken. This ensures that the equipment and fields are suitable for spreading activities to be undertaken, minimising the potential for odour from poor land spread management techniques. If conditions are unsuitable and spreading cannot be undertaken, then other fields on a deployment agreed with the Environment Agency which include the same waste stream will be sought.
EM 02-011	Land Injection / Application Procedure	Outlines the land injection / application process, to ensure that materials are spread to land in a controlled manner, minimising the potential for odour from land spreading operations.
EM 02-009	Waste Procedure	Ensures that wastes are recovered in compliance with the permit minimising the potential for site to generate odours through poor waste management techniques.
EM 02-004	Waste Acceptance Procedure	Controls the deliveries of potentially odorous materials at site and ensures that deliveries are supervised or any issues are relayed to site management. E.g. if an environmental incident such as a spill occurs it is cleaned up appropriately and not left to degrade and become potential odour sources.

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Environmental Management System				
Document Reference:	Issue No.	Issue Date:	Review Date:	Approved By:
EM 01-003	draft	Draft	draft	Alan Asker

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Table 4 - Listing of Key Procedures		
EMS / Site Systems Reference	Procedures / Policies Identified in OMP	Justification for Use in Potential Odour Impact Area
EM 02-003	Spill Control Procedure	Control, mitigate, clean-up of spills and / or leaks of potentially odorous materials on site to ensure they are not left to become potential odour sources.
EM 03-007	Field Assessment Form	Document provides the template for undertaking the assessment for sensitive receptors at the deployment application stage.
EM 02-010 / EM 03-005	Odour Assessment Procedure and Form	Odour monitoring is undertaken to assess the level of odour generation from waste operations and the potential for off-site impacts so that pro-active mitigation can be undertaken.
EM 02-007 / EM 03-003	Communication and Complaints Procedure and Complaints Record	Communication with regulatory authorities and environmental complaints from third parties is covered by this procedure so that the relevant corrective action can be undertaken in the event of a complaint.
EM 03-001	Incident and Corrective Action Report Form	These forms are used to note complaints and also to instigate the appropriate level of management commitment any issues relating to odour at deployment sites. The forms ensure any corrective actions are commissioned and undertaken. A review of the corrective action will be included to ensure satisfactory completion.
EM 03-011	Deployment Schedule	Outlines the waste materials spread to land, there odour potential and the deployments where they are authorised to

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Environmental Management System				
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EM 01-003	draft	Draft	draft	Alan Asker

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Table 4 - Listing of Key Procedures		
EMS / Site Systems Reference	Procedures / Policies Identified in OMP	Justification for Use in Potential Odour Impact Area
		be spread.
EM 05-001	Emergency Contact List	Ensures relevant contact numbers are readily available to site staff.

Note: all land spread operatives are trained in the OMP and relevant procedures referenced above. Their training records are stored within the site office.

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Monitoring and Evaluation

Key Receptors

Receptors sensitive to odour emissions from site will be outlined on the field plans developed for the land spread deployments. A copy of these plans and associated receptor schedules will be stored as part of the EMS and are made available to the land spread operative. These are to be considered when undertaking odour monitoring and assessing odour impact control measures.

Odour Monitoring

Monitoring of site odours by sniff test is to be undertaken as set out in Table 5 below. This system has been designed to assess the level of odour generation on site and the potential for off-site impacts so that pro-active mitigation can be undertaken.

Table 5 - Odour Monitoring				
Location	Responsibility	Frequency	Form Completed	
Active Deployment Site	Land Spread Operative	Throughout the day to confirm that operations are not causing a nuisance when spreading.	EM 02-004	Drivers Record Sheet
	Operations Manager	Once per round of spreading.	EM 02-010	Odour Monitoring Procedure
Deployment and Permitted Stores	Operations Manager	Weekly	EM 03-010	Store Inspection Form
Deployment and Permitted Site	Land Spread Operative / Operation Manager / TCM	Immediately following an odour complaint or notification from operative that operations are causing an odour nuisance.	EM 02-010	Odour Monitoring Procedure
		Immediately following an on-site incident that could lead to odour		

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Environmental Management System				
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EM 01-003	draft	Draft	draft	Alan Asker

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Table 5 - Odour Monitoring			
Location	Responsibility	Frequency	Form Completed
		emissions - e.g. major spillage during delivery / storage vessel failure.	

Weather Conditions

Prevailing weather conditions are monitored by the land spread operatives throughout the working day with the weather conditions recorded on the EM 03-004 Drivers Record Sheet. Weather forecasts are monitored by Site Management so that pre-emptive action can be taken in the event of a prolonged unfavourable weather forecast, which could potentially result in land being unfit to spread on i.e. waterlogged, frozen, snow covered, prevailing winds towards a sensitive receptor. The contingency in the event of a prolonged unfavourable weather forecast is to bulk waste in permitted stores and / or identify other suitable fields or use the EM 05-001 Emergency Contact List to contact waste contingency contractors. Where pre-emptive action is taken, this is to be recorded using the EM 03-001 Incident and Corrective Action Report Form, detailing the actions taken.

Complaints

Odour complaints are dealt with by the Communications and Complaints Procedure detailed within the EMS System Index. This has been designed to manage all communications in relation to regulatory authorities, interested parties, staff and environmental complaints.

Interpretation of Monitoring Results and Complaint Records

Site Management will review all odour monitoring records to ensure trends in results are established and that any control measures in place are working as intended. This will be undertaken during Site Management meetings, which occur once a week.

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Environmental Management System				
Document Reference:	Issue No.	Issue Date:	Review Date:	Approved By:
EM 01-003	draft	Draft	draft	Alan Asker

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Land Spread Odour Management Plan Annex

Number	Title
EM 02-002	Emergency and Incident Procedure
EM 02-003	Spill Procedure
EM 02-004	Waste Acceptance Procedure
EM 02-005	Land Spread Procedure
EM 02-006	Drivers Field Manual
EM 02-007	Communication and Complaints Procedure
EM 02-009	Waste Procedure
EM 02-010	Odour Monitoring Procedure
EM 02-011	Land Injection / Application Procedure
EM 03-001	Incident and Corrective Action Report Form
EM 03-003	Complaints Record
EM 03-004	Drivers Record Sheet
EM 03-005	Odour Monitoring Form
EM 03-007	Field Assessment Form
EM 03-011	Deployment Schedule
EM 05-001	Emergency Contact List

GH By-Products (Derby) Ltd	Organisational Structure and Responsibilities			
Environmental Management System				
Document Reference:	Issue No.	Issue Date:	Review Date:	Approved By:
EM 01-004	1	22.03.19	22.03.20	Alan Asker

Management Responsibility

Overall responsibility for commitment to Environmental Management lies with the Directors at GH By-Products (Derby) Ltd. The Directors are responsible for providing the necessary resources to ensure permit compliance.

The overall responsibility for the Land Spread Environmental Management System associated with the site's land spread permit, lies with the Operations Manager. This responsibility is discharged with the assistance of suitably trained employees.

The Operations Manager will ensure:-

- GH By-Products (Derby) Ltd is committed to minimising the effect of its land spread processes on the environment. Site's land spread processes include the storage and the spreading of wastes under agreed deployments.
- Staff are trained to be aware of the environmental risks identified and their roles in ensuring that these risks are minimised;
- They and or / relevant contractors have demonstrated the necessary level of technical competence through an approved scheme and ensure the relevant continuing competence requirements are met.

Organisational Structure and Job Functions

The environmental responsibilities for specific levels and roles are described within the matrix below.

Roles, Responsibilities and Training

The following Responsibilities Matrix ensures the company identifies key environmental roles and responsibilities so that responsibilities for environmental management are defined and appropriate training needs for staff can be assessed in relation to the environmental management system and significant environmental impacts.

Where relevant, all personnel are to be suitably trained in relation to the Environmental Management System and specifically in tasks they undertake to fulfil their job role.

The Environmental Roles and Responsibilities Matrix outlined in the table below is used to characterise the Environmental Roles and Responsibilities as part of land spread activities for each relevant staff level. Table 1 provides a general overview of the main environmental roles and responsibilities applicable to the facility's staffing structure; Table 2 provides specific operatives roles and responsibilities. The Training Matrix (EM 07-001) outlines which environmental documents within the EMS that staff should specifically be trained in and this is recorded on the Training Record (EM 07-002). Induction training is also provided to ensure all staff are aware of the:

- Regulatory implications of the Environmental Permits and licenses;

GH By-Products (Derby) Ltd	Organisational Structure and Responsibilities			
Environmental Management System				
Document Reference:	Issue No.	Issue Date:	Review Date:	Approved By:
EM 01-004	1	22.03.19	22.03.20	Alan Asker

- Potential environmental effects of the operations undertaken as part of site operations;
- Need for reporting deviations from the Environmental Permit and licenses and actions to be taken in the event of an environmental emergency during site operations.

GH By-Products (Derby) Ltd	Organisational Structure and Responsibilities			
Environmental Management System				
Document Reference:	Issue No.	Issue Date:	Review Date:	Approved By:
EM 01-004	1	22.03.19	22.03.20	Alan Asker

Table 1: Main Environmental Roles and Responsibilities Matrix		
Personnel ↓	Overall Responsibilities	Day to Day Responsibilities
Directors ↓	The Directors are ultimately responsible for all land spread activities.	
Operations Manager ↓	<p>The Operations Manager is ultimately responsible for – Implementing and operating the Land Spread Environmental Management System (EMS) as required by the Environmental Permit.</p> <p>A land spread activities on a day to day basis either directly or by delegation to a competent contractor.</p> <p>The site complying with all environmental legislation during the permitted activities.</p> <p>Promoting good environmental practices and awareness across the site and communicate environmental issues across the site.</p> <p>Communicating key environmental issues with the Directors.</p>	<p>Responsibilities include;</p> <p>Practise all EMS procedures where appropriate;</p> <p>Ensure the necessary deployment applications are in place;</p> <p>Provide supervisory assistance to the process;</p> <p>Provide adequate resources for environmental legal compliance and continued development of the EMS.</p> <p>Ensure all relevant training for EMS Procedures is provided to appropriate staff and that this is documented.</p> <p>Deal appropriately with any incident, near miss or emergency situation;</p> <p>Investigate any instance of environmental non-compliance;</p> <p>Arrange for repairs and maintenance of relevant equipment.</p> <p>Liaise with Regulators and all other relevant parties as appropriate.</p>

GH By-Products (Derby) Ltd	Organisational Structure and Responsibilities			
Environmental Management System				
Document Reference:	Issue No.	Issue Date:	Review Date:	Approved By:
EM 01-004	1	22.03.19	22.03.20	Alan Asker

Table 1: Main Environmental Roles and Responsibilities Matrix		
Personnel ↓	Overall Responsibilities	Day to Day Responsibilities
		<p>Ensure all required environmental reporting to the regulator is submitted and all environmental reviews completed.</p> <p>Ensure copies of all technical competence certificates held by staff members / contractors, are held on site.</p>
Technical Competent Manager ↓	<p>Responsible assisting the Operations Manager to ensure the site / contractors are complying with all environmental legislation.</p> <p>Responsible for implementing and operating the Land Spread Environmental Management System (EMS) at deployment locations.</p> <p>Responsible for communicating key environmental issues with the Directors and Operations Manager.</p> <p>Promote good environmental practices and awareness across the deployment sites and communicate environmental issues across the deployment site.</p> <p>Review the environmental management systems effectiveness and make recommendations for improvements where needed. Reviews of the EMS are to be undertaken following:</p> <ul style="list-style-type: none"> - A change in relevant legislation; 	<p>Responsibilities include;</p> <p>Practise all EMS procedures where appropriate;</p> <p>Ensure the necessary deployment applications are in place;</p> <p>Provide supervisory assistance to the process;</p> <p>Deal appropriately with any incident, near miss or emergency situation;</p> <p>Investigate any instance of environmental non-compliance;</p> <p>Liaise with Regulators and all other relevant parties as appropriate.</p> <p>Ensure all relevant training for EMS Procedures is provided to appropriate staff and that this is documented.</p> <p>Complete all reviews of EMS documents.</p> <p>Ensure all required environmental reporting to the regulator is submitted and all environmental reviews completed.</p>

GH By-Products (Derby) Ltd	Organisational Structure and Responsibilities			
Environmental Management System				
Document Reference:	Issue No.	Issue Date:	Review Date:	Approved By:
EM 01-004	1	22.03.19	22.03.20	Alan Asker

Table 1: Main Environmental Roles and Responsibilities Matrix		
Personnel ↓	Overall Responsibilities	Day to Day Responsibilities
	<ul style="list-style-type: none"> - Change in the materials spread to land under the permit; - Change in the land spreading processes / techniques; - An environmental incident while undertaking permitted operations. 	
Front Line Employees (Administrative staff / Land Spread Operatives including Contractors)	To follow all relevant instructions and training provided as part of their duties.	Responsibilities Include: Practise all EMS Procedures they are trained in Report any instances of environmental non-compliance, incidents, near-misses, emergencies, or improvements to the management team. Attend all relevant training events and inform the management team on any uncertainties.
Notes: All EMS documents are referenced within EM 00 System Index.		

GH By-Products (Derby) Ltd	Organisational Structure and Responsibilities			
Environmental Management System				
Document Reference:	Issue No.	Issue Date:	Review Date:	Approved By:
EM 01-004	1	22.03.19	22.03.20	Alan Asker

Table 2: Specified Operatives Environmental Roles and Responsibilities Matrix			
Environmental category	Specific activity	Specified Operatives	Responsibilities
Technical Competence / Operations Manager	All permitted operations.	Technical Competent Manager / Operations Manager	<p>The TCM and Operations Manager will have a copy of and be familiar with the following:</p> <ul style="list-style-type: none"> • Site's SRP 2010 No4 Standard Rules Permit; • The Environmental Management System Implemented under the permits; • All deployment application / issue documents, for the spreading operations they are supervising; • Environmental Permit - 'How to comply with your Environmental Permit' and 'Technical Guidance Note, No. EPR 8.01 – additional guidance for spreading waste to land operations'. <p>The TCM and Operations Manager is responsible for ensuring:</p> <ul style="list-style-type: none"> • Land Spread operations are carried out in accordance with the permits and deployments agreed with the regulator; • They have sufficient authority to give or withdraw approval for deliveries to stores and / or spreading to go ahead at a particular time using dynamic risk assessment (for example taking into account prevailing weather conditions); • They are able to be at a deployment site within 2hrs when spreading is occurring and 4 hrs at any other time; • The TCM is responsible for signing in, using a site diary when visiting a deployment / storage site. • They issue clear verbal instructions to land spread operative of the loads of waste to be spread and to which fields; • Land spread operatives have a copy of the following documents prior to commencing spreading operations, to ensure permit compliance and that sensitive sites are protected:

GH By-Products (Derby) Ltd	Organisational Structure and Responsibilities			
Environmental Management System				
Document Reference:	Issue No.	Issue Date:	Review Date:	Approved By:
EM 01-004	1	22.03.19	22.03.20	Alan Asker

Table 2: Specified Operatives Environmental Roles and Responsibilities Matrix			
Environmental category	Specific activity	Specified Operatives	Responsibilities
			<ul style="list-style-type: none"> • Relevant Field Plans and Field Assessment Forms, highlighting buffer zones and sensitive receptors; <ul style="list-style-type: none"> ○ Drivers Field Manual (EM 02-006) ○ Land Injection / Application Procedure (EM 02-011) ○ Drivers Record Sheet (EM 03-004) ○ Emergency Contact List (EM 05-001).
Various Waste Streams Odours	Land Spreading	Technical Competent Manager / Operations Manager	<p>Ensure that all relevant storage infrastructure and land spread equipment is subject to planned preventative maintenance and ensure adequate records are kept for all maintenance activities.</p> <p>Ensure that all appointed contractors are suitably qualified to undertake their designated tasks</p> <p>Ensure sufficient deployments are notified with the Environment Agency to cover the volumes of waste proposed to be spread.</p>
		Land Spread Operatives	To follow all instructions issued to them by the Technical Competent Manager and Operations Manager.
	Odour Management	Technical Competent Manager / Operations Manager	<p>Ensure that the odour management plan is being followed at all times. Liaise with regulators as required with regards odour issues. Review and update the OMP as necessary.</p> <p>Undertake odour monitoring on and off site as required by the procedure. Log all monitoring records and odour complaints. Evaluate results to look for any trends and areas for potential improvement/</p>
		Technical Competent Manager / Operations	Undertake odour surveys as requested and following training.

GH By-Products (Derby) Ltd	Organisational Structure and Responsibilities			
Environmental Management System				
Document Reference:	Issue No.	Issue Date:	Review Date:	Approved By:
EM 01-004	1	22.03.19	22.03.20	Alan Asker

Table 2: Specified Operatives Environmental Roles and Responsibilities Matrix			
Environmental category	Specific activity	Specified Operatives	Responsibilities
		Manager / Front Line Employees	

GH By-Products (Derby) Ltd	Fugitive Emissions Monitoring Programme			
Environmental Management System				
Document Reference:	Issue No.	Issue Date:	Review Date:	Approved By:
EM 01-005	Draft	Draft	draft	Alan Asker

Purpose

The purpose of the Fugitive Emissions Monitoring Programme (FEMP) is to ensure that infrastructure monitoring provides a robust mechanism that ensures fugitive emissions to land, sewer and controlled waters are kept to a minimum.

After periodic review, where necessary amendments to the inspection, testing and maintenance programme for pollution prevention infrastructure at the installation will be made to ensure their continued integrity.

Fugitive Emissions Monitoring Programme

The FEMP will be incorporated into the facility's Environmental Management System (EMS). The FEMP Schedule outlines the frequency of inspections and monitoring.

Audits and review of the monitoring programme may lead to revisions of the monitoring plan in terms of frequency and the level of detail required. FEMP monitoring records will be kept for the Environmental Permit lifetime.

The FEMP incorporates the elements listed below and, where deficiencies are found, these will be reported on the Incident and Corrective Action Report Form. This will ensure deficiencies are rectified by instigating the appropriate level of management involvement and ensuring corrective actions are implemented.

The inspection and maintenance of operational equipment and process machinery, whose failure could have an impact upon the environment, will be covered by the Planned Preventative Maintenance system on site.

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

Waste Storage Vessels

The site uses dedicated containers for storing waste materials prior to sending them to deployment sites for land spreading under normal operations. 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.

Stores have been constructed and will be maintained to the CIRIA Report C759 Livestock manure and silage storage infrastructure for agriculture. Records of construction to this standard are held as part of the site's EMS.

Above ground stores will be fully cleaned out every 10 years and their integrity confirmed by a suitably trained member of site staff. Records of the clean down and inspection will be documented.

Deliveries and Collections

All material deliveries and collections will contact Site Management prior to arrival at / collection from a deployment location. Drivers are instructed as to the waste vessel to make their delivery to / collection from. Spill kits are present at permitted / deployment stores and will be checked as part of the stores inspection for need of replenishment.

GH By-Products (Derby) Ltd	Fugitive Emissions Monitoring Programme			
Environmental Management System				
Document Reference:	Issue No.	Issue Date:	Review Date:	Approved By:
EM 01-005	Draft	Draft	draft	Alan Asker

Corrective Action Structure

Any faults or deficiencies encountered by the monitoring programme will be detailed within the Incident and 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.

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.

GH By-Products (Derby) Ltd	Site Closure Plan			
Environmental Management System				
Document Reference:	Issue No.	Issue Date:	Review Date:	Approved By:
EM 01-006	Draft	Draft	draft	Alan Asker

Introduction

The Site Closure 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 facility 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

Any waste remaining on site at the time of permit surrender, will be sent to a suitably licensed recovery / disposal facility.

ii. Disposal of Ancillary Materials

Any other materials still remaining will either be sold or sent to a suitably licensed recovery / disposal facility.

iii. Dismantling of Process Equipment

All processing equipment will be mobile e.g. vehicles / pumps. These will be removed from site prior to permit surrender.

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.

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2. Site Condition Report (SCR)

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 Environment Agency's H5 guidance and template. The SCR 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
Site Condition Reports Guidance and Templates
Construction Records
Reference documents updated following review or amendment
Waste 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
Operational Changes
Documents submitted to the regulator at permit surrender
Site Closure Plan
Site Condition Report Records

a. Core reference documents

The following documents will be stored at permit issue with the SCR 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

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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 Site Closure Plan reviews.

Environmental Permits

A copy of all permits including variations issued to site.

Store Construction Records

Records will be held to confirm that permitted stores were constructed in line with permit requirements i.e. designed and constructed in accordance with an appropriate specification in CIRIA Report C759 Livestock manure and silage storage infrastructure for agriculture'

b. Reference Documents Updated Following Review or Amendment

Waste Schedule

A Waste Schedule will be kept and updated in line with permit requirements along with the associated legal documentation. This will identify all the waste imported to the facility that could provide a risk to the environment. This information will outline the following:

Waste Characteristics	Site Specific Characteristics
Waste Stream; EWC Code; Origin.	Handling Arrangements;

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. 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. If relevant and necessary, confirmatory analytical testing of underlying ground/groundwater will be undertaken, 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 SCR will be filed.

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Records

All records relating to the Permit, Closure Plan and SCR will be held in hard copy folder by the Company for the lifetime of the Permit.

ii. Documents Submitted to the Regulator at Permit Surrender

All documents associated with the Closure Plan and SCR 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 Site Closure Plan will be reviewed and updated accordingly at the following intervals:

- Where substantial changes to site infrastructure occurs;
- Where a Permit variation occurs.

GH By-Products (Derby) Ltd	Overarching Procedure Requirements			
Environmental Management System				
Document Reference:	Issue No.	Issue Date:	Review Date:	Approved By:
EM 02-001	1	22.03.19	22.03.20	Alan Asker

1. Purpose:

To ensure all staff understand the Procedures and outline common requirements relating to all procedures within the EMS.

2. Procedure:

- I. All staff that are required to be trained in any Environmental Management System procedure are required to be trained in this document.
- II. The document outlines the basic requirements that are implicit within each of the procedures listed within the EMS System Index EM 00.

3. Definitions contained within procedures:

EP: Environmental Permit.

EA: Environment Agency

4. Responsibilities assigned within each procedure:

Site Management

- I. Responsible for ensuring that all relevant staff are aware of the relevant Procedures.
- II. Responsible for taking action with regards specific procedural requirements as outlined in each Procedure
- III. Responsible for ensuring that incident and corrective actions required following a procedural non-conformance are implemented effectively.
- IV. Responsible for ensuring appropriate records are being maintained as outlined within the Procedures.
- V. Responsible for ensuring that records are regularly reviewed and appropriate actions taken.
- VI. Responsible for ensuring that all staff designated responsibility for relevant procedures are trained appropriately.

All Applicable Staff

- I. Responsible for following the procedure they have been trained in.
- II. Responsible for reporting instances where the procedure was not or could not be followed to Site Management.

GH By-Products (Derby) Ltd	Overarching Procedure Requirements			
Environmental Management System				
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EM 02-001	1	22.03.19	22.03.20	Alan Asker

5. Records:

All records relevant to the Procedures and communications with the regulatory authorities and interested parties will be stored in the Site Office and kept for the EP lifetime, unless otherwise specified.

6. Monitoring:

Implementation and records associated with each Procedure will be assessed as part of scheduled EMS reviews and audits.

7. Correction of Non-Conformity:

The Incident and Corrective Action Report Form will detail any non-conformance with a Procedure, or where a Procedure could not be followed and outline corrective action requirements, as appropriate.

8. Training Need and Updating Mechanisms:

All designated staff will be made aware of the appropriate procedures as relevant. Specific staff will be trained in relevant procedures as required by EM 01-004. Training records will be held on site.

GH By-Products (Derby) Ltd	Emergency and Incident Procedure			
Environmental Management System				
Document Reference:	Issue No.	Issue Date:	Review Date:	Approved By:
EM 02-002	1	22.03.19	22.03.20	Alan Asker

1. Purpose

Prevent and mitigate the environmental impacts associated with emergency, incident and near miss situations.

2. Definitions

Emergency incident: For this facility it has been determined that an emergency incident or situation in relation to environmental considerations is constituted by the escape off site of materials potentially hazardous to 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 incident situation regardless of whether it has escaped off site or not.

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

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

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

Normal: Routine activity on site.

Abnormal: Planned deviation from normal operating procedures.

3. Procedure:

In the event of the uncontrolled release resulting in an environmental emergency or incident:

- I. Where safe to do so, it is the responsibility of the member of staff witnessing the event to turn off the supply of the material at its source whilst following site safety rules and procedures. The staff member is responsible for shutting down any equipment and plugging the emission point if possible and inform Site Management;
- II. Where the situation is unsafe, immediately contact Site Management who will contact all relevant authorities detailed on the Emergency Contact List and follow any instructions given;
- III. The member of staff dealing with the event will try to contain the discharge and prevent it from entering water courses using the spill kits provided following the EM 02-003 Spill Procedure;
- IV. Site Management will note the type of material involved, approximately how much was released into the environment and all receiving receptors;
- V. Site Management will contact all relevant authorities detailed on the Emergency Contact List and follow any instructions given;

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Environmental Management System				
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EM 02-002	1	22.03.19	22.03.20	Alan Asker

VI. Site Management will complete an Incident & Corrective Action Report Form (EM 03-001) and ensuring corrective actions are instigated where required.

Following a Near Miss:

- I. The member of staff witnessing the near miss is responsible for informing a member of Site Management;
- II. Where appropriate, the member of staff witnessing the near miss will render the area safe;
- III. Site Management are responsible for ensuring an Incident & Corrective Action Report Form is completed (EM 03-001) and ensuring that corrective actions are instigated where necessary.

4. Equipment Required:

- I. Spills kits.

GH By-Products (Derby) Ltd	Spill Control Procedure			
Environmental Management System				
Document Reference:	Issue No.	Issue Date:	Review Date:	Approved By:
EM 02-003	1	22.03.19	22.03.20	Alan Asker

1. Purpose:

Control and mitigate the clean-up of spills and / or leaks of wastes or other hazardous substances.

2. Procedure:

In the event of a spill / leak:

- I. The member of staff / contractor witnessing the spill is responsible for informing a member of Site Management;
- II. If safe to do so and wearing appropriate personal protective equipment, the member of staff / contractor is to stop the leak / spill at source if possible;
- III. If safe to do so and wearing appropriate personal protective equipment, the member of staff / contractor is responsible for trying to contain the spill using the spill kits provided and for soaking up the spill and transferring it to a container if possible.
- IV. Site Management will determine if the waste can be returned to the storage vessel or is to be classified as hazardous or non-hazardous waste by following the EM 02-009 Waste Procedure;
- V. Site Management will arrange for the clean-up and collection of the waste stream as appropriate. Waste streams that have been cleaned up will be placed in a suitable container which will be labelled appropriately.
- VI. Any wastes collected by site from the deployment location / permitted site will be taken back to head office to await collection by a suitably licensed waste contractor.
- VII. Site Management are responsible for noting the type of material involved, approximately how much was spilt and how much may have escaped into the surrounding environment.
- VIII. Site Management will ensure that an Incident Report & Corrective Action Form (EM 03-001) is completed and will inform the relevant authorities, where necessary;
- IX. Site Management will ensure that the corrective actions detailed within the Incident & Corrective Action Form have been instigated;
- X. Site Management will determine if spill control equipment requires replenishment.

3. Equipment Required:

- Spill control equipment – as a minimum each spill control kit will include 75kg of sand (3 x 25 k.g. bags), a shovel and an bucket. Where there may be a particular risk of run-off impacting water courses then spill containment booms and/or absorbent booms will be added to the kit. Buckets and sand will be held at the storage locations, shovels and booms will be carried on all delivery vehicles;
- PPE.

GH By-Products (Derby) Ltd	Waste Acceptance Procedure			
Environmental Management System				
Document Reference:	Issue No.	Issue Date:	Review Date:	Approved By:
EM 02-004	1	22.03.19	22.03.20	Alan Asker

1. Purpose:

Control of the delivery of waste streams to site.

2. Procedure:

Waste Acceptance / Method of Delivery

- I. The EM 02-005 Land Spread Procedure details the waste assessment to be completed by site prior to adding wastes to a land spread deployment / delivery to a permitted store;
- II. Waste streams are delivered direct to stores registered under deployments / site based permits by customers / contractors and site staff;
- III. **Site Staff** - Prior to collecting the waste from the waste producers, the operative will ensure the waste stream to be collected can be delivered to the store specified by Site Management. This is done by cross referencing the waste stream and stores listed within the EM 03-011 Deployment Schedule. If in any doubt, contact Site Management.
- IV. Upon collection of the waste stream, the site operative will ensure a Waste Transfer Note (WTN) is completed or a WTN Season Ticket is in place, WTNs / Season Tickets need to provide the following information:

WTN requirement	Example info to provide / Guidance on what is expected
Origin of the waste	Address where the waste has come from
Quantity	Quantity to be accepted on site e.g. 10 tonnes, 1 lorry load.
Transport Date	Date of collection and removal from origin site.
Carrier Details	The name of the Waste Carrier company
Recipients Details	The name of the Waste Receiver – AWSM Recycling Limited
Waste Description	Description of the waste being accepted on site, e.g. Wash Water.
EWC Codes	European Waste Catalogue codes – see accepted list of waste above.
Handling Requirements	Details of any specific handling requirements related to the waste stream.
Packaging/Storage Arrangements	Details of any specific packaging and storage requirements related to the waste stream.
Signed by Site of Origin and Carrier	The WTN should be signed off by the waste producer and carrier.
Confirmation of / details on the waste hierarchy consideration for the treatment / disposal option	This is a tick box which must be completed by the producer of the waste.
The Standard Industry Code (SIC) for the Company the waste has been collected from. This is to be taken from the 2007 SIC list.	The waste producers SIC as listed in the 2007 SIC list.

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EM 02-004	1	22.03.19	22.03.20	Alan Asker

V. **Customers and Contractors** – Site Management are notified by email / phone, prior to deliveries being made by customers / contractors. Prior to the waste being delivered, Site Management will confirm with the customer / contractor:

- the waste to be delivered;
- the maximum volume that can be delivered; and
- the store the delivery is to be made to.

VI. Site Management maintain an inventory of the volumes of wastes held in individual stores. This inventory will maintain a 'live' balance of the volumes held in each store, so that loads can be directed accordingly.

VII. All drivers making deliveries to stores will follow the EM 02-012 Waste Delivery Procedure.

Non-Conforming Loads

- i. Non-conforming loads arriving at site will either be rejected or be sent to an isolation area for quarantine;
- ii. 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. 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.
- iv. Records of non-conforming waste received / identified at site and the action taken to remove the waste from site, will be detailed using the Incident and Corrective Action Report Form.

3. Records:

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

Duty of Care records (Waste Transfer Notes) for non-hazardous wastes must be held for a minimum of 2 years. Duty of Care records will be stored hard copy on site.

GH By-Products (Derby) Ltd	Land Spread Procedure			
	Environmental Management System			
Document Reference:	Issue No.	Issue Date:	Review Date:	Approved By:
EM 02-005	1	22.03.19	22.03.20	Alan Asker

1. Purpose:

This procedure details the following elements of the land spreading processes at site:

- Laboratory analysis requirements;
- Deployment applications and notifications;
- Waste application instructions;
- Deployment Duty of Care Records.

2. Procedure:

Lab Analysis:

Wastes

Wastes to be included in deployment applications are cross checked against waste acceptance criteria detailed in the site's Permit. Where a waste is deemed suitable for land spreading, a representative sample of the waste stream is sent for analysis. As a minimum, the following suites will be analysed:

Cadmium	Zinc	Sulphur	Conductivity	Phosphorus Total
Chromium	Lead	Total Solids	Total Nitrogen	Sodium
Copper	Mercury Total	pH Value	Potassium	Magnesium
Oil / Fat Content	B.O.D	Calcium	Ammoniacal Nitrogen	Nickel

A sample of each waste stream to be applied to land will be sent to an analytical laboratory for analysis every twelve months.

Where a new set of analysis is acquired for an existing waste stream, this will be checked against the previous set of waste analysis to identify any significant changes. Where significant changes are detected, the waste supplier will be contacted to establish the reason for the change.

All waste suppliers will be contacted to request that they inform site when their production processes change and / or when they are aware that the properties of the waste stream they send to site have altered. In these instances, Site Management will ensure that the materials delivered to site remain suitable for land application and in line with agreed deployments.

Soils

A sample of the soils from the fields where the waste streams will be applied will be sent to an analytical laboratory for analysis every four years. As a minimum, the following suites will be analysed:

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pH	Phosphate	Potassium	Magnesium	Soil Type (e.g. Sandy silty loam)
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Land Spreading:

Deployment Application

- I. The Operations Manager will ensure deployment applications are submitted to the EA using EA application forms for Deployments, enabling the site to spread permitted waste streams to land;
- II. Records of applications will be kept on site in the site office. Active deployments will be recorded on the Land Spread Inventory (EM 05-003);
- III. For all successful deployment applications, a spread sheet is set up to include the applicable organic manure analysis and crop nutrient loading requirements for each field. Based on this data, when volumes of organic manures delivered to store / spread to land are entered into the spread sheet, the spread sheet is able to calculate the nutrient loadings available in store / applied to the individual fields and the capacity of the fields remaining as a % of the crop nutrient requirement and tonnes of organic manure, while taking into consideration the absolute permit limit of 250 t waste / ha / yr.

The spread sheet assists with the management of crop nutrient requirements and provides Site Management with data to ensure nutrients are added in the most efficient way and that spreading rates / nutrient loadings as per the agreed deployment are not exceeded.

Deployment Notification

- I. Site Management will notify the EA by email, at least 48 hours but no more than 7 days in advance of the intention to commence spreading under the permit.
- II. In the event that spreading operations stop for more than 7 days the Environment Agency shall be notified at least 48 hours but no more than 7 days in advance of the intention to recommence spreading.
- III. A copy of the notification will be stored with the relevant deployment records.

Waste Collection and Spreading

- I. Weather forecasts are monitored to ensure that suitable deployment locations are selected prior to land spreading operations taking place.
- II. Site Management will refer to the excel sheets configured for the deployment site and will verbally specify to a trained member of staff / contractor (the "driver")

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which field/s to spread the registered waste streams on. Site Management will also specify the quantity of the waste that should be spread;

- III. The driver will consult the Drivers Field Manual (EM 02-006) and relevant field plan which highlights any buffer zones that were identified as part of the deployment application. These buffer zones must not be spread on;
- IV. Prior to spreading the driver will inspect the spreading equipment for signs of damage that may compromise it's integrity. In the event that damage to the equipment is detected an Incident and Corrective Action Report Form (EM 03-001) will be completed and the necessary action taken prior to loading;
- V. Upon passing inspection, the spreading equipment will be taken to the relevant discharge / collection point and the waste stream collected;
- VI. In the event of a spill, the Spill Control Procedure (EM 02-006) must be followed and a member of senior management notified;
- VII. On arriving at the selected field/s the driver must make a visual inspection of the field and ensure it is suitable to be spread on, i.e. the field is not snow-covered, water logged or frozen; the inspection criteria are set out in the Driver's Field manual and Details of the assessment are to be recorded on Drivers Record Sheet (EM 03-004);
- VIII. If the selected field/s are unsuitable for land spreading, this must be recorded on the Drivers Record Sheet (EM 03-004) and senior management informed. A more suitable field can then be identified, or an alternative authorised disposal route selected, by a member of senior management;
- IX. Spreading will be undertaken in line with the EM 02-011 Land Injection Procedure and the EM 02-006 Drivers Field Manual. During the spreading process the driver must consult the field plan to ensure they do not spread on the buffer zones;
- X. Once the spreading is complete, the volumes applied and the completed risk assessment must be recorded in the EM 03-004 Drivers Record Sheet.

Duty of Care Records

- XI. In order to satisfy duty of care requirements, the farmer of the land used for land spreading will receive records of spreading undertaken on their land. This will include:
 - A copy of the deployment application as agreed between site and the EA;
 - Duty of Care waste written information prior to commencement of spreading. This is to be signed by both parties (A Hughes & Son

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(Skellingthorpe) Ltd representative and farmer) A Hughes & Son (Skellingthorpe) will retain a copy on site;

- Upon completion of the deployment / spreading activities at the farm, details of the volume of wastes and nutrient loadings applied to individual fields (using form EM 04-002). This is to be signed by both parties (A Hughes & Son (Skellingthorpe) and farmer) and a copy retained by both parties.

Deployment Review / EA Quarterly Return

- In order to ensure the maximum amount of waste spread does not exceed the volume agreed under the deployment, data from the EM 03-004 Drivers Record Sheet will be logged onto a excel spread sheet. The spreadsheet will be configured so that the amount spread to the individuals fields, can be reviewed against the volumes permitted to be spread under the deployment. This spread sheet will be kept up to date on a weekly basis as a minimum.
- Quarterly data will be supplied to the EA using the EA's quarterly waste return.

GH By-Products (Derby) Ltd	Drivers Field Manual			
Environmental Management System				
Document Reference:	Issue No.	Issue Date:	Review Date:	Approved By:
EM 02-006	1	22.03.19	22.03.20	Alan Asker

Purpose: To provide a guide for drivers spreading waste streams to registered fields.

Required Documents: Before spreading drivers require the following:

- Field Plans and Field Assessment Forms (supplied by management);
- Drivers Record Sheet (EM 03-004);
- Emergency Contact List (EM 05-001).

Initial Guidance: When spreading drivers should follow the Land Injection Procedure (EM 02-011) at all times.

Upon collecting instructions and a Drivers Record Sheet (EM 03-004) and arriving at the relevant field, follow the 'Before, During and After Spreading Instructions' below.

Before Spreading: make a visual field assessment and record the weather conditions and field condition in the Drivers Record Sheet (EM 03-004). The assessment rating / key is given using the following table:

Field Condition	Rating	Cloud Conditions	Key
Very Dry	1	Raining	R
Dry	2	Showers	SH
Wet	3	Snowing	S
Waterlogged	4	Cloudy	C
Frozen	5	Sunny	SU
Snow Covered	6	Fog	F

The following working definitions are to be used when assessing field conditions. Always default to the permit definition to ensure permit compliance:

- Waterlogged (permit definition) means when the whole of the plough layer is saturated/filled with water by virtue of a high-water table or water collected (perched) above a compacted soil.
- Waterlogged 'in field' assessment guide: Standing water is visible over at least 20% of the spreadable area and/or a heel indent test (boot heel pressed into the soil to a 2cm depth) shows visible subsurface water remaining after 10 seconds delay at a minimum of 4 out of 10 randomly chosen test points.
- Frozen (permit definition) - The soil is frozen for more than 12 hours in the previous 24 hours. Days when soil is frozen overnight but thaws out during the day do not count.
- Frozen (using injectors 'in field' assessment guide): Ice or frost is visible over at least 50% of the spreadable area and the depth of the frozen ground is greater than 1cm.
- Frozen (using dribble bar 'in field' assessment guide): Ice or frost is visible over at least 20% of the spreadable area.
- Snow-covered: Snow is visible over at least 20% of the field's spreadable area and the visible snow depth is sufficient to cover the ground completely to at least 1cm depth.

Where fields have areas that are frozen or snow covered, they will have buffer zones and not be spread on.

If a field rating is given of 4 to 6, **no spreading is to take place.**

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Environmental Management System				
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Assess the relevant field plan to establish any buffer zones which should not be spread on. These are indicated by areas shaded red on the plans. **No spreading will take place, as a minimum:**

- I. **Within 10 meters of a water course;**
- II. **Within 50 meters of a spring or sink;**
- III. **Within 10 meters of a residential property;**
- IV. **Within 50 metres of a residential property when spreading all other waste streams.**

If a buffer zone has been identified in a field plan, do not spread in the buffer zone. If a watercourse has been identified on the filed plan, adjacent to the field boundary record if there are any signs of pollution both upstream and downstream before you spread.

Finally record the date and time of spreading along with the weather conditions and wind direction.

During Spreading: take great care not to spread into buffer zones. If operating on sloping ground take extra care to avoid material run-off. Observe for any odour nuisance from the activity during spreading operations from undertaking a sniff test. If any odour nuisance is detected complete an Odour Assessment following the EM 02-010 Odour Assessment Procedure.

After Spreading: if a water body was identified on the field plan check to see if there are any signs of pollution. Look for signs of any material run-off and confirm there was no odour nuisance from that activity and record all of the information on the Drivers Record Sheet (EM 03-004).

If there were any signs of pollution to a watercourse (before or after landspreading) or any other problems, raise these with site management **immediately**. These will be recorded on an Incident and Corrective Action Report Form (EM 03-001) and will be thoroughly investigated by site management and any incident reported to the Environment Agency's Pollution Hotline.

GH By-Products (Derby) Ltd	Communication & Complaints Procedure			
Environmental Management System				
Document Reference:	Issue No.	Issue Date:	Review Date:	Approved By:
EM 02-007	1	22.03.19	22.03.20	Alan Asker

1. Purpose:

To manage all communications in relation to regulatory authorities, interested parties, staff and environmental complaints.

2. Procedure:

Complaints

- I. Staff receiving complaints via the telephone or in person will record the complaint on a Complaints Record (EM 03-003).
- II. Complaints Records 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, including communication with the relevant authorities. If not the complaint will be reviewed by the management team to determine if it is a justified complaint. In either case the Complaint Record will be completed by Site Management.
- IV. If a definite cause for the complaint is identified corrective action will follow as detailed within the Complaint Record.
- V. The implementation of the corrective action will be reviewed by Site Management and the Complaint Record 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.
- VII. In all cases management will aim to provide information the Complainant within 48 hours of receiving the complaint, even if this is to inform the complainant that investigations are still ongoing.

Regulators

- I. Formal reporting required by the Environmental Permit will be submitted to the EA in accordance with the Environmental Permit.
- II. For the following situations, the EA must be notified without delay by Site Management:-
 - Any breach, or known imminent breach, of a Permit Condition;

GH By-Products (Derby) Ltd	Communication & Complaints Procedure			
Environmental Management System				
Document Reference:	Issue No.	Issue Date:	Review Date:	Approved By:
EM 02-007	1	22.03.19	22.03.20	Alan Asker

- Any occurrence / incident as defined in the Environmental Accident Management Plan, and specifically:-
 - “the detection of any malfunction, breakdown, or failure of equipment or techniques, accidents or fugitive emission which has caused, is causing or may cause pollution”
 - “the breach of a limit specified in the Permit”
 - “any significant adverse environmental effects”
 - Receipt of a valid environmental complaint (eg, odour).
- III. Immediate notification to the EA should be by telephone using the details in the Emergency Contact List;
- IV. For all situations stated in II above, written communication using the EM 04-001 EA Notification Form should be provided within 24 hours of site being aware of the issue, unless otherwise agreed in writing with the EA site inspector;
- V. The Part B section of the EA Notification Form should be issued to the EA with all necessary supporting documents within a timeframe agreed with the EA.
- VI. All other communications with Regulators should be made or confirmed in writing and kept on record.

GH By-Products (Derby) Ltd	Document Control Procedure			
Environmental Management System				
Document Reference:	Issue No.	Issue Date:	Review Date:	Approved By:
EM 02-008	1	22.03.19	22.03.20	Alan Asker

1. Purpose:

To control all documentation that forms part of the Environmental Management System (EMS) on site.

2. Procedure:

- I. The Controlled copy of the EMS documentation will be held in the following location:
 - o Site Office (all master copies).
 Other copies of documents issued by Site Management will be regarded as uncontrolled.
- II. Site Management are responsible for issuing EMS documents to staff that require them;
- III. Site Management are responsible for the review and update of all controlled documents on-site;
- 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. Site Management are then responsible for issuing updated versions of the documents as necessary;
- VI. The update will include the new document and will request that all the redundant documents be returned to Site Management;
- VII. Site Management will record the nature of the update on a copy of the Document Control Update Form;
- VIII. Site Management are responsible to record the return of obsolete documents on the same form to provide an audit trail that all versions are fully up to date;
- IX. Site Management will maintain the system documentation either in hard copy, on computer or a mixture of both formats. Only documentation held by Site Management will be considered controlled;
- X. Other copies of documents issued by Site Management will be regarded as uncontrolled;
- XI. Site Management will issue documents and ensure that old versions of the documents are removed;
- XII. One copy of all superseded documents will be held in archive;
- XIII. A Incident and Corrective Action Form (EM 03-001) will be completed if an old version of any documentation is discovered in use.

3. Responsibilities:

Site Management: Are responsible for implementing this procedure and maintaining the Environmental Management System.

4. Equipment Required:

N/A

GH By-Products (Derby) Ltd	Document Control Procedure			
Environmental Management System				
Document Reference:	Issue No.	Issue Date:	Review Date:	Approved By:
EM 02-008	1	22.03.19	22.03.20	Alan Asker

5. Monitoring:

The referenced documents will be reviewed annually by the Site Management in consultation with appropriate staff:

Any persistent document control issues will be reviewed and amended at this point. All records will be kept for 6 years.

6. Records:

Site Management will maintain control of the system documentation.

GH By-Products (Derby) Ltd	Waste Procedure			
Environmental Management System				
Document Reference:	Issue No.	Issue Date:	Review Date:	Approved By:
EM 02-009	1	22.03.19	22.03.20	Alan Asker

1. Purpose:

To control the recovery / disposal of waste.

2. Procedure:

On- Site Handling and Disposal

- I. In order to determine the appropriate (European Waste Catalogue) EWC code for each waste stream, the waste produced by the site will be assessed by the Managing Director 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 EWC code;
- II. Site Management are responsible for ensuring sufficient and correct vessels for each waste stream are provided;
- III. All staff will ensure that all wastes are disposed of in the correct containers;
- IV. Management are to be informed immediately if waste vessels are full or there are insufficient numbers of vessels to dispose of waste;
- V. Management will arrange for waste collections for off-site recovery / disposal at a frequency which prevents a shortage of waste vessel capacity;

Waste Documentation

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

Waste transfer notes (for non hazardous waste streams) need to provide the following information:

WTN requirement	Example info to provide / Guidance on what is expected
Origin of the waste	Your site address
Quantity	For example, If skip/bins/dolavs – specify max volume it can hold; for drums – x No. 205 litres; or weight from weighbridge records
Transport Date	Date of collection and removal from site (include year!)
Carrier Details	The name of the Waste Carrier company and Carrier Registration Number.
Recipients Details	The name of the Waste Receiver company – this may have to be completed by the Waste Carrier and returned to site at some stage in future

GH By-Products (Derby) Ltd	Waste Procedure			
Environmental Management System				
Document Reference:	Issue No.	Issue Date:	Review Date:	Approved By:
EM 02-009	1	22.03.19	22.03.20	Alan Asker

WTN requirement	Example info to provide / Guidance on what is expected
Waste Description	You should never rely on waste carriers or waste management contractors to describe your waste for you. As the producer, you are most able to describe your waste accurately. It is not acceptable to use non-specific terms such as 'general waste'.
EWC Codes	European Waste Catalogue code.
Handling Requirements	Specify any specific requirements of your waste stream
Packaging/Storage Arrangements	Specify any specific requirements of your waste stream
Signed by Site and Carrier	Essential – do not allow waste to be transferred without both parties signatures
Confirmation of / details on the waste hierarchy consideration for the treatment / disposal option	This is a tick box which must be adhered to. The Managing Director will have the records to ensure it has been complied with
The SIC for your Company from the 2007 list)	38320

Consignment Notes (for hazardous waste streams) need to provide the following information:

CN requirement	Example info to provide
Consignment Note Code;	You are to specify this – it is the <i>premises code</i> (see below), followed by a series of numbers of letters determined by you.
Address of Producer;	Your site address
Waste will be taken to (Consignee);	The company who receives waste to recover or dispose of it.
Waste Arising Process;	For example , maintenance
The SIC for your Company from the 2007 list)	38320
EWC Code;	See European Waste Catalogue
Quantity;	This has to be in kilograms (kg)
Physical Form;	Liquid / Solid / Gas / Powder / Sludge / Mixed
Chem. & Bio Constituents;	For example , “cleaning chemical name” – 20% caustic.
Hazard Codes;	Specify which of H1-H15
Container Type/ No.;	For example , 6x205 litre drums
Carrier Name & Address;	The name & address of the Waste Carrier company
Registration No.;	Waste Carriers registration number – for them to provide
Reason for Exemption if applicable;	Waste Carrier to provide information
Confirmation of waste hierarchy consideration	This is a tick box which must be adhered to. Your Managing Director will have the records to ensure it has been complied with
Sections on :- ‘UN identification number(s)’,	The consignment note must give these details if the waste is ‘dangerous for carriage’ . This responsibility falls to the carrier of

GH By-Products (Derby) Ltd	Waste Procedure			
Environmental Management System				
Document Reference:	Issue No.	Issue Date:	Review Date:	Approved By:
EM 02-009	1	22.03.19	22.03.20	Alan Asker

CN requirement	Example info to provide
'Proper shipping name(s)', 'UN Class(es)', 'Packing group(s)' and 'Special handling requirements'	dangerous goods , whether they move them for themselves or for some other person or business. However, if the waste moves under a contract for carriage, the consignor named in the contract takes responsibility. Be aware the term 'consignor' may be different from that used for the Hazardous Waste Regulations. You can get more information on carriage of dangerous goods from Health and Safety Executive website http://www.hse.gov.uk/cdg/manual/index.htm .

- 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 the Environmental Manager and held on-site. The status of all licences and certification will be reviewed on an annual basis;
- V. Receipt documentation will be kept to further account for the waste volumes sent for recycling/ disposal.

3. Records:

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.

GH By-Products (Derby) Ltd	Odour Assessment Procedure			
Environmental Management System				
Document Reference:	Issue No.	Issue Date:	Review Date:	Approved By:
EM 02-010	1	22.03.19	22.03.20	Alan Asker

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. Monitoring Frequency

Odour monitoring following this procedure will be undertaken at the following frequencies:-

- Once per round of spreading at a deployment site;
- Immediately upon receipt of a complaint from a third party or Regulator;
- Immediately upon receipt of notification of odour nuisance from site staff or visitor/contractor;
- Following an on-site incident that could lead to odour emissions - e.g. major spillage during delivery / storage vessel failure.

3. Procedure:

Odour monitoring is only to be undertaken by approved members of staff who have received training in this odour assessment procedure. Site Management will ensure that once a fortnight, monitoring is also undertaken by member of staff that has not become desensitised to land spread operations that day.

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 / field plan. As a minimum, one monitoring point will be located on each site / field boundary (North, East, South, West);

With reference to the plan, complete the Odour Monitoring Form as follows:

- Note name of the assessor, the date and reason for the odour assessment (Routine / Following a Compliant / Incident);
- Describe operations on site (e.g. materials spread to land in last hour) and any relevant off site conditions (e.g. other farm applying slurry to land);

Spend at least one minute at each odour assessment point and record the following:

- Note the time the odour assessment started and was completed;
- Details of any odour detected in terms of its intensity and extent using the scales below:
- If any odour detected, is this a Constant or Intermittent Odour;
- Where not stated, add the Receptor Sensitivity using the scale below;
- Describe any odour detected (e.g. fresh manure odour);
- List the odour source where this is identifiable (e.g. manure heap).

GH By-Products (Derby) Ltd	Odour Assessment Procedure			
Environmental Management System				
Document Reference:	Issue No.	Issue Date:	Review Date:	Approved By:
EM 02-010	1	22.03.19	22.03.20	Alan Asker

Key			
Score	Odour Intensity	Odour Extent	Receptor Sensitivity
0	No detectable odour.	No detectable odour	
1	Normal background levels.	Local and transient (only detectable on the installation or within the installation boundary during brief periods when wind drops or blows).	Remote. (No housing, commercial premises or public area within 500m of site boundary.)
2	Slightly higher than normal, but no specific cause identified (due to weather, increase in throughput or similar).	Transient as above, but detected outside of the boundary.	Low Sensitivity. (No housing, commercial premises or public area within 100m of site boundary.)
3	Specific item (s) identified as causing an odour, but localised to site with a short duration (e.g. manure heap in field to West).	Persistent but fairly localised.	Moderate Sensitivity. (Housing, commercial premises or public area within 100m of site boundary.)
4	Odours strong enough to be identified off site.	Persistent and pervasive up to 50m outside the installation boundary.	High Sensitivity. (Known complaints arising from residents within the area.)
5	Very strong odour and incident causing significant odour on and off site. (Very offensive, possibly causing nausea, particularly if not accustomed to this odour).	Persistent and widespread (odour detected >50m from the boundary).	

- If Odour is detected at the site boundary at an intensity of 4 or above and the receptor sensitivity is 3 or above, inform site management and complete an offsite odour assessment, following the steps above;
- Complete the prevailing weather conditions section of the odour monitoring form and attach an online weather report if available.

Where off-site odours are detected which could impact on receptors, perform the following:

- Inform Site Management;
- Complete Incident & Corrective Action Report Form;
- Identify likely source;

GH By-Products (Derby) Ltd	Odour Assessment Procedure			
Environmental Management System				
Document Reference:	Issue No.	Issue Date:	Review Date:	Approved By:
EM 02-010	1	22.03.19	22.03.20	Alan Asker

- Mitigate where possible;
- Inform the Environment Agency.

GH By-Products (Derby) Ltd	Land Injection-Application Procedure			
Environmental Management System				
Document Reference:	Issue No.	Issue Date:	Review Date:	Approved By:
EM 02-011	1	22.03.19	22.03.20	Alan Asker

1. Purpose

To outline the land injection / waste application process, to ensure that materials are spread to land in a controlled manner, minimising the potential for odour from land spreading operations.

2. Procedure

Spreading Equipment and Controls

The wastes will be applied using land injection equipment.

Prior to Injection / Application

1. Upon arrival at the site, the (Land Injecting Operative) LIO inspects the spreading equipment (tractor / injector) to ensure it is fit to start operations. This includes checks of oil, water levels, the injector is set to operate at the correct working depth and assessment of umbilical pipework. Any issues are to be dealt with using the EM 03-001 Incident and Corrective Action Form.
2. Complete the preoperational field assessment as outlined within the EM 02-006 Drivers Field Manual and record the results of the assessment on the EM 03-004 Drivers Record Sheet.

Land Injecting / Application

1. The LIO then begins the injection / application run.
2. During the injection / application run, the LIO visually monitors the spreading equipment to the rear of the cab and consults the relevant field plan to ensure the spreading equipment remains field side of any buffer zones.
3. As the spreading equipment approaches the end of the field run, the LIO starts to turn the tractor to begin the next run. At the turning point, where applicable the injector is lifted up to prevent the tractor from rolling over and the equipment from being damaged during the turn. Depending on the field conditions, this could result in the injector being fully lifted out of the field. Minimal quantities of material will be present on the field surface where the LIO has completed the run and turned the spreading equipment.
4. Once the LIO has completed the turn to begin the next run, the injector is lowered back into the field. The injection run process is then repeated.

Following Injection

1. Operatives undertaking spreading activities are responsible for ensuring that all stores are secured and the equipment is cleaned after use as required.

Throughout the Working Day

GH By-Products (Derby) Ltd	Land Injection-Application Procedure			
Environmental Management System				
Document Reference:	Issue No.	Issue Date:	Review Date:	Approved By:
EM 02-011	1	22.03.19	22.03.20	Alan Asker

The following inspections and assessments are completed throughout the working day (when materials are spread to land) by the LIO.

Inspection / Assessment Element	Frequency of Inspection	EMS form Completed
Field condition and prevailing weather conditions.	Throughout the working day.	EM 03-004 Drivers Record Sheet
Odour Nuisance From Spreading Activity	Sniff test for odour nuisance undertaken throughout the day during spreading operations.	EM 03-004 Drivers Record Sheet
	Detailed sniff test once per round of spreading following the EM 02-010 Odour Assessment Procedure.	EM 03-005 Odour Assessment Form
Note: The above outlines the minimum frequency of inspection. In reality operatives are working in the field throughout the working day and any issues will be detected as they occur.		

All land spread records will be kept for a minimum of 6 years.

GH By-Products (Derby) Ltd	Waste Delivery Procedure			
Environmental Management System				
Document Reference:	Issue No.	Issue Date:	Review Date:	Approved By:
EM 02-012	1	22.03.19	22.03.20	Alan Asker

1. Purpose:

Control of the delivery of waste materials to site stores.

2. Procedure:

- I. All drivers making deliveries to storage vessels will be trained in this procedure and will only deliver to stores identified by Site Management GH By-Products (Derby) Ltd;
- II. The stores to receive the delivery are identified by Site Management using the EM 02-004 Waste Acceptance Procedure;
- III. Prior to any connections being made, the driver and / or a land spread operative will check any available level gauges on the storage facility to which the waste stream is to be delivered, to confirm the vessel has the capacity to receive the load;
- IV. The driver of the delivery vehicle is responsible for ensuring all connections to pipe work are made in the designated connection area and above a drip tray;
- V. The delivery tanker discharge pipework will then be connected to the storage vessels connection point. Once connected the valve to the storage vessel will be opened, then the delivery tankers distribution valve opened and then the delivery tanker pump switched on;
- VI. Any available level gauges will be monitored throughout the delivery process. If material reaches the 'fill level', the delivery process will be halted. The tanker distribution valves will be closed and the delivery tanker pump will remain on for a short period to blow the delivery pipe clear, before being switched off. The vessel distribution valve will then be closed. Site Management will be contacted to identify a suitable storage vessel with sufficient capacity to receive the remainder of the delivery, with the delivery made following this procedure at all times.
- VII. Once the contents of the delivery tanker has been emptied into the storage vessel, the delivery tankers pump with remain on for a short period to blow the delivery pipe clear, before being switched off.
- VIII. The storage vessel and tanker distribution valves will then be closed and the connection pipework from the delivery tanker uncoupled.
- IX. If a spill occurs the member of staff / customer / contractor witnessing the spill is responsible for following the Emergency and Incident Procedure (EM 02-002) and the Spill Control Procedure (EM 02-003).

3. Records:

WTN's for all waste delivered to the store will be held in the site office.

GH By-Products (Derby) Ltd	Waste Store Inventory Procedure			
Environmental Management System				
Document Reference:	Issue No.	Issue Date:	Review Date:	Approved By:
EM 02-013	1	22.03.19	22.03.20	Alan Asker

1. Purpose:

Control of the inventory of waste materials in site stores.

2. Procedure:

- I. For each deployment a live waste balance spreadsheet is produced. A copy of the spreadsheet is maintained and updated by senior management. The spreadsheet lists the following:
 - Fields registered and nutrient requirements for each field.
 - Allowed wastes and nutrient concentrations for each waste.
 - Registered store and its capacity.
- II. Each load that is put into the store will be logged into the spreadsheet. The quantity transferred into the store will be entered and the type of waste picked from the list of allowed wastes. The spreadsheet will automatically calculate the amount of each nutrient added and add this to the running total of nutrient in the store. The spreadsheet will also add the waste amount to the running total of waste in the store.
- III. Each load that is removed from the store for spreading will be logged into the spreadsheet. The quantity transferred from the store will be entered into the spreadsheet together with the field identifier for where the waste is spread. The spreadsheet will automatically calculate the amount of each nutrient removed and subtract this from the running total of nutrient in the store. The spreadsheet will also subtract the waste amount from the running total of waste in the store.
- IV. The spreadsheet will calculate the amount of waste spread to each field and keep running totals of total waste quantity and nutrient loads. The spreadsheet will flag up to management when either total waste or any particular nutrient load is at 90% of the allowed maximum.
- V. Management will use the live total spreadsheet to manage the inventory in the store as follows:
 - Prior to accepting a waste load into the store management will check that there is sufficient physical capacity in the store to accept the additional waste material.
 - Management will also check that the additional waste plus the waste already in the store is within the allowances for total waste quantities and for nutrient amounts for the deployment. If total waste or a particular nutrient would exceed the allowances then the load cannot be accepted.
 - Management will review the store inventory spreadsheet regularly (at least monthly) and ensure that the amount of waste in the store can be utilised at typical spreading rates before the end of the deployment. Once it is clear that the current inventory is sufficient to reach the end of the deployment then no further wastes will be accepted into the store until it has been emptied and a new deployment registered.

3. Check Audit

- I. Once per quarter, corresponding with the dates for waste returns, management will do a waste reconciliation on the store. This will involve adding the amount of waste brought in to the previous inventory total and subtracting from this the amount of waste taken from the

GH By-Products (Derby) Ltd	Waste Store Inventory Procedure			
Environmental Management System				
Document Reference:	Issue No.	Issue Date:	Review Date:	Approved By:
EM 02-013	1	22.03.19	22.03.20	Alan Asker

store for spreading. This running total will be compared to an estimate of the store quantity derived from a physical inspection. Allowing for inaccuracies in estimating the store volume the two totals should still correlate within about 20% at worst. If the two values are more than 20% apart then an Incident and Corrective action Form will be raised.

4. Records:

Spreadsheets will be maintained by management and will be backed up at least weekly.

GH By-Products (Derby) Ltd	Incident & Corrective Action Form			
Environmental Management System				
Document Reference:	Issue No.	Issue Date:	Review Date:	Approved By:
EM 03-001	1	22.03.19	22.03.20	Alan Asker

Location on Site:		Date & time of Incident:	
Team / Staff involved:			
Incident / Non Conformance / Complaint <i>(Delete as appropriate)</i>			
1. What happened?		2. What caused it?	
Member of Site Management (SM) informed:		[Tick] <input type="checkbox"/>	
Name:			
3. Immediate Correction required / taken			
Designated SM / staff member to deal with incident resolution			
Corrective Action Required	Yes/No	Implemented by:	
4. Is an EA notification required to be sent to the Environment Agency?		Yes* / No	
		*EA Notification Form ref:	
Incident report signed by Director or SM:			Date:
5. Corrective action			
Target date corrective action to be completed:			
Corrective action agreed & signed by Site Management:			Date:

GH By-Products (Derby) Ltd	Incident & Corrective Action Form			
Environmental Management System				
Document Reference:	Issue No.	Issue Date:	Review Date:	Approved By:
EM 03-001	1	22.03.19	22.03.20	Alan Asker

Corrective action confirmed as completed by:		Date:
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EM03-001 Incident & Corrective Action Form - Guidance

AS SOON AS YOU HAVE COMPLETED THE FORM, HAND IT IMMEDIATELY TO A MEMBER OF SITE MANAGEMENT

Related Procedures

For further clarification, definitions or details please refer as necessary to:

- EM 01-002 –Environmental Accident Management Plan
- EM 02-002 – Emergency & Incident Procedure
- EM 02-003 – Spill Control Procedure
- EM 02-007 – Communications and Complaints Procedure

Form - Page 1 guidance notes

Note, where necessary, when completing the form overleaf, continue on separate sheet if necessary & add Incident Date, Time and your Name to each page. Attach any further sheets to this one.

Section of form		Guidelines
1	Incident (includes permit beaches, spills and leaks)	Description of the environmental emergency, incident or near miss. Refer to EM 02-002 if required. Please detail what happened including, as appropriate , what & how much material was involved, where did the material go, who was involved, equipment/machinery involved, materials lost, detail emissions that went off site, who was contacted and any other information you consider relevant.
	Non-conformance	If the issue relates to a non conformance with the EMS – detail the errors in “what happened” (could include: not following procedures, incorrect completion for forms, errors on schedules, issues identified by audits)
	Complaint	Upon on receipt of a complaint relating to environmental issues (e.g. noise/dust/odour/litter) – provide the following details in “what happened”:- name of complainant; date and time of complaint; contact details for complainant; location of complaint; description of complaint. Also add weather conditions at time of complaint (temp, wind speed and direction, cloudy/raining), activities on site that might relate to complaint (eg delivery of waste materials to field storage tank). Where appropriate, include actions required and record of feedback to complainant.
2	What caused it	This should attempt to identify what is the root cause of the issue that has been listed in the “what happened” section
3	Immediate correction	Detail what action was taken, what procedures were followed
4	EA Notification requirements	EA to be informed without delay following the detection of any malfunction, breakdown or failure of equipment or techniques, accident or emission of a substance not controlled by an emission limit which has caused, is causing or may cause significant pollution. Written confirmation to be provided to the EA using EM 04-001 within 24 hours of the issue being identified.
5	Corrective Action	Provide a description of corrective actions to be undertaken, resources required, desired outcomes following implementation of actions

GH By Products (Derby) Ltd	Document Control Update Record			
	Environmental Management System			
Document Reference:	Issue No.	Issue Date:	Review Date:	Approved By:
EM 03-002	1	22.03.19	22.03.20	Alan Asker

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:

1. Controlled Copies of EMS documents are held in the following locations:
 - a. Site Office

GH By Products (Derby) Ltd	Complaints Report Form			
	Environmental Management System			
Document Reference:	Issue No.	Issue Date:	Review Date:	Approved By:
EM 03-003	1	22.03.19	22.03.20	Alan Asker

(Add further details on Incident and Corrective Action Report Form (EM 03-001) if necessary and staple to this form)

To be completed by Initial Compliant Handler				
Date:		Complaint Ref:		Dealt with By:
Name of complainant:				
Telephone No:				
Time & Date of Complaint:				
Date, Time & duration of offending event/incident				
Location of complaint/incident if not at the above address				
Complainant's description of event/incident (e.g. describe type of odour, strong/weak, continuous, fluctuating):				
Site Management to complete				
Weather conditions (i.e. dry, rain, fog, snow)				
Wind strength (light, steady, strong, gusting)				
Wind direction				
Are there any other related complaints? (relating to the same incident/event):				
Any other relevant information (i.e. previous complaints of same nature):				
On site activities at the time the complaint occurred (e.g. land spreading / spillage / normal operations etc)				
Opinion / findings – reason for complaint?				
Actions to be taken:				
Do the EA need to be informed of the complaint?				<i>Please tick</i>
If yes, have the EA been made aware of the cause (if determined)?				<i>Please tick</i>
Informed the complainant of the outcome?				<i>Please tick</i>
Actions Completed Date:				
Form Completed By:				
Signed:				Date:

GH By Products (Derby) Ltd	Complaints Report Form			
Environmental Management System				
Document Reference:	Issue No.	Issue Date:	Review Date:	Approved By:
EM 03-003	1	22.03.19	22.03.20	Alan Asker

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GH By Products (Derby) Ltd	Drivers Record Sheet			
Environmental Management System				
Document Reference:	Issue No.	Issue Date:	Review Date:	Approved By:
EM 03-004	1	22.03.19	22.03.20	Alan Asker

Date of land spread:		Waste applied		Table Key			
Pre-operational Assessment				Field Condition	Rating	Cloud Conditions	Key
Assessment Completed By:				Very Dry	1	Raining	R
Time of pre-operational assessment:				Dry	2	Showers	SH
Conditions				Wet	3	Snowing	S
Wind Direction, e.g. From the South West				Waterlogged	4	Cloudy	C
Where the wind direction is towards human occupied receptors within 100 metres of the field boundary, complete an EM 03-005 Odour Monitoring Form within 2 hours of operations commencing at the field boundary closest to the identified receptor.				Frozen	5	Sunny	SU
Wind Speed				Snow Covered	6	Fog	F
Cloud Condition							
Temp (very warm, warm, mild, cold, or degrees C if known)							
Field Condition prior to spreading ⁴							

Date	Time of Spreading	Field Reference	Tonnage Applied	Field Condition ¹	Cloud Conditions ¹	Wind Direction	Watercourse Within / Along Field Boundary (Y / N)	Pollution in the Watercourse Before and After Spreading?				Material Run Off	Odour Nuisance From Spreading Activity	Materials Spread and Assessment Completed By
								Upstream		Down Stream				
								Before	After	Before	After			

¹Field Condition & cloud conditions: Enter the number /letter from the 'table key' which best describes the field and cloud conditions If the field condition rating is 4 - 6 Do Not spread on that field. At all times refer to your Drivers Field Manual (EM 02-006).

GH By Products (Derby) Ltd	Drivers Record Sheet			
Environmental Management System				
Document Reference:	Issue No.	Issue Date:	Review Date:	Approved By:
EM 03-004	1	22.03.19	22.03.20	Alan Asker

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¹Field Condition & cloud conditions: Enter the number /letter from the 'table key' which best describes the field and cloud conditions. If the field condition rating is 4 - 6 Do Not spread on that field. At all times refer to your Drivers Field Manual (EM 02-006).

GH By-Products (Derby) Ltd	Odour Monitoring Form			
	Environmental Management System			
Document Reference:	Issue No.	Issue Date:	Review Date:	Approved By:
EM 03-005	1	22.03.19	22.03.20	Alan Asker

Name of assessor:				Date of assessment:				Reason for Assessment:	Routine / Complaint / Incident
Nature of operations on site						Off Site Conditions (e.g. farmer spreading in adjacent field)			
Location (as per site / field plan.)	Time Started	Time Finished	Intensity (0-5)	Extent (0-5)	Constant or Intermittent Odour (C / I)	Receptor Sensitivity (0-4)	Description of any Odour Detected	Odour Source / Any Other Comments	
Mark any further assessment points and detail reasons for assessing at that location.									
Odour is assessed off-site when odour is detected at the site boundary at an intensity of 4 or above and the receptor sensitivity is 3 or above. Where this is the case inform site management and complete an Incident and Corrective Action Report Form									
Weather conditions		Wind Direction (e.g. from North)						Wind Speed (Beaufort scale)	
Cloud Cover						Rain (no / light / heavy / snow / sleet / fog)			

GH By-Products (Derby) Ltd	Odour Monitoring Form			
	Environmental Management System			
Document Reference:	Issue No.	Issue Date:	Review Date:	Approved By:
EM 03-005	1	22.03.19	22.03.20	Alan Asker

Temp (very warm, warm, mild, cold, or degrees if known)		Online Weather Report attached?	
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GH By-Products (Derby) Ltd	Odour Monitoring Form			
Environmental Management System				
Document Reference:	Issue No.	Issue Date:	Review Date:	Approved By:
EM 03-005	1	22.03.19	22.03.20	Alan Asker

Key			
Score	Odour Intensity	Odour Extent	Receptor Sensitivity
0	No detectable odour.	No detectable odour	
1	Normal background levels.	Local and transient (only detectable on the installation or within the installation boundary during brief periods when wind drops or blows).	Remote. (No housing, commercial premises or public area within 500m of site boundary.)
2	Slightly higher than normal, but no specific cause identified (due to weather, increase in throughput or similar).	Transient as above, but detected outside of the boundary.	Low Sensitivity. (No housing, commercial premises or public area within 100m of site boundary.)
3	Specific item (s) identified as causing an odour, but localised to site with a short duration (e.g. manure heap in field to West).	Persistent but fairly localised.	Moderate Sensitivity. (Housing, commercial premises or public area within 100m of site boundary.)
4	Odours strong enough to be identified off site.	Persistent and pervasive up to 50m outside the installation boundary.	High Sensitivity. (Known complaints arising from residents within the area.)
5	Very strong odour and incident causing significant odour on and off site. (Very offensive, possibly causing nausea, particularly if not accustomed to this odour).	Persistent and widespread (odour detected >50m from the boundary).	

Wind Speed 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

GH By Products (Derby) Ltd		Audit and Document Review Record Form		
Environmental Management System				
Document Reference:	Issue No.	Issue Date:	Review Date:	Approved By:
EM 03-006	1	22.03.19	22.03.20	Alan Asker

Note: When completed this form becomes a record stored in EM 008-004

Internal audit/review report

Date of Audit /
Review:

Auditor(s) / Reviewers:

Site Management member(s) present:

Description of areas covered by
audit / review:

Audit / Review findings

Item no.	Item Description	Current Status	Findings (Errors / Weaknesses / Best Practice Examples)	Improvements / Actions Required	Timeframes & Responsibility for Improvements	Date Actions / Improvements Completed

Date Audit / Review Issued to Site:

GH By Products (Derby) Ltd		Field Assessment Form			
Environmental Management System					
Document Reference:	Issue No.	Issue Date:	Review Date:	Approved By:	
EM 03-007	1	22.03.19	22.03.20	Alan Asker	

Field Assessment Template – Completed Field Assessments are stored in the EM 08-010 Field Plans and Assessment Records Section of the EMS

Field Data					Receptor Data ^{2/3}						
Field Ref ¹	Central Field Grid Reference	Field Size (ha) ¹	Available Area for Spreading (ha) ¹	Geology		Closest Watercourses within 50 metres	Nitrate Vulnerable Zone	Groundwater Safeguard (Nitrate) / Source Protection Zones 1 & 2	Habitat Receptors within 500 metres ³ (Plan reference and designation)	Residential Receptors within 500 metres	Flood Zone?
				Superficial	Bedrock						

Notes:

- Fields are shown on the Receptor Plans within ***document reference***. Field sizes and receptor distances based on mapping data generated on www.promap.co.uk.
- The receptors identified are those within the closest proximity in each compass direction (North, East, South, West) of the specified field. Receptor distance stated is to the closest point of the field.
- The receptor reference shown in 'Bold' is the receptor identifier as per the field plan.
- Habitat Receptor includes the assessment for – Sites of Special Scientific Interest, Special Areas of Conservation, Special Protection Areas and Biodiversity Action Plan Habitats. The designation of the habitat has been listed in the table above.

GH By Products (Derby) Ltd	Land Spread Inventory			
Environmental Management System				
Document Reference:	Issue No.	Issue Date:	Review Date:	Approved By:
EM 03-008	1	22.03.19	22.03.20	Alan Asker

Issued 25-03-19

Deployment Reference	Field No	Available Hectares	Registered Date	Finish Date	Waste Mix		Field within NVZ (Y / N)	Comments
					SPR (t / ha / yr)	Vol. to be Spread		
Location Ref: Villa Farm EA Ref: GB3804KW/D001 ENG Ref: P171-DA1 Total	V1	8.22	22.03.19	21.03.20	80	657	Y	Date of first registration 22/03/2019. Soil Analysis due from May 2022 Spreading rates reduced due to nutrient loadings within the waste stream.
	V2	5.45	22.03.19	21.03.20	84	457	Y	
	V3	2.54	22.03.19	21.03.20	26	66	Y	
	V4	4.32	22.03.19	21.03.20	84	362	Y	
	V5	4.4	22.03.19	21.03.20	84	369	Y	
	W1	3.84	22.03.19	21.03.20	26	99	Y	
	PK03	4.92	22.03.19	21.03.20	36	177	Y	
	Posskit 2	8.7	22.03.19	21.03.20	36	313	Y	
	Posskit 3	7.6	22.03.19	21.03.20	36	273	Y	
		49.99				2773		

The volume available to spread is calculated by multiplying the available hectares of the field by the stated spreading rate for the field. See Table 1.2.1 of the agreed benefit statement for further details of the waste mix.

GH By Products (Derby) Ltd	Land Spread Inventory			
Environmental Management System				
Document Reference:	Issue No.	Issue Date:	Review Date:	Approved By:
EM 03-008	1	22.03.19	22.03.20	Alan Asker

Issued 25-03-19

Deployment Reference	Field No	Available Hectares	Registered Date	Finish Date	Waste Mix		Field within NVZ (Y / N)	Comments
					SPR (t / ha / yr)	Vol. to be Spread		
Location Ref: Thorpe Grange Farm Hykeham EA Ref: GB3804KW/D002 ENG Ref: P171-DA2 Total	PK01	7.07	22.03.19	21.03.20	36	254	Y	Date of first registration 22/03/2019.
	PK04	1.71	22.03.19	21.03.20	84	143	Y	
	PK05	1.97	22.03.19	21.03.20	84	165	Y	Soil Analysis due from May 2022
	PK06	3.3	22.03.19	21.03.20	84	277	Y	
	PK07	10.66	22.03.19	21.03.20	28	298	Y	Spreading rates reduced due to nutrient loadings within the waste stream.
	PK10	3.77	22.03.19	21.03.20	28	105	Y	
		28.48				1242		

The volume available to spread is calculated by multiplying the available hectares of the field by the stated spreading rate for the field. See Table 1.2.1 of the agreed benefit statement for further details of the waste mix.

GH By Products (Derby) Ltd	Land Spread Inventory			
Environmental Management System				
Document Reference:	Issue No.	Issue Date:	Review Date:	Approved By:
EM 03-008	1	22.03.19	22.03.20	Alan Asker

Issued 25-03-19

Deployment Reference	Field No	Available Hectares	Registered Date	Finish Date	Waste Mix		Field within NVZ (Y / N)	Comments
					SPR (t / ha / yr)	Vol. to be Spread		
Location Ref:	PF01	10.88	22.03.19	21.03.20	84	913	Y	Date of first registration 22/03/2019.
	SAM034	2.24	22.03.19	21.03.20	84	188	Y	
Park Farm	Hewitt 1	6.11	22.03.19	21.03.20	37	226	Y	Soil Analysis due from December 2021
	Hewitt 2	12.28	22.03.19	21.03.20	37	454	Y	
EA Ref: GB3804KW/D003	SH1	1.95	22.03.19	21.03.20	37	72	Y	Spreading rates reduced due to nutrient loadings within the waste stream.
	SH2	3.06	22.03.19	21.03.20	37	113	Y	
ENG Ref: P171-DA3 Total		36.52				1966		

The volume available to spread is calculated by multiplying the available hectares of the field by the stated spreading rate for the field. See Table 1.2.1 of the agreed benefit statement for further details of the waste mix.

GH By Products (Derby) Ltd	Land Spread Inventory			
Environmental Management System				
Document Reference:	Issue No.	Issue Date:	Review Date:	Approved By:
EM 03-008	1	22.03.19	22.03.20	Alan Asker

Issued 25-03-19

Deployment Reference	Field No	Available Hectares	Registered Date	Finish Date	Waste Mix		Field within NVZ (Y / N)	Comments
					SPR (t / ha / yr)	Vol. to be Spread		
Location Ref:	Hewitt 3	5.05	22.03.19	21.03.20	84	424	Y	Date of first registration 22/03/2019.
Park Farm	Hewitt 4	4.75	22.03.19	21.03.20	84	399	Y	
		Hewitt 5	2.49	22.03.19	21.03.20	84	209	Y
EA Ref:	PF70	25.71	22.03.19	21.03.20	37	951	Y	
GB3804KW/D004	PF14	5.87	22.03.19	21.03.20	37	217	Y	Spreading rates reduced due to nutrient loadings within the waste stream.
ENG Ref: P171-DA4	SAM034	2.24	22.03.19	21.03.20	0	0	Y	
Total		46.11				2200		

The volume available to spread is calculated by multiplying the available hectares of the field by the stated spreading rate for the field. See Table 1.2.1 of the agreed benefit statement for further details of the waste mix.

GH By Products (Derby) Ltd	Waste Written Information Record			
Environmental Management System				
Document Reference:	Issue No.	Issue Date:	Review Date:	Approved By:
EM 03-009	1	22.03.19	22.03.20	Alan Asker

Waste Producer Information (Transferor)							
Waste Producer	Waste Producer / Collection Point Address	Permit Reference	Waste Carrier Details	SIC	Waste Stream	List of Wastes Code	Waste Description
A Hughes and Son (Skellingthorpe) Ltd	Jerusalem Farm, Jerusalem Rd, Skellingthorpe, Lincoln, LN6 4RL	IPPC/2007/14 – Issued by North Kesteven District Council	CBDU113966 Carrier / Broker / Dealer	38210	Condensate	02.02.99	Processed ABP Material from Rendering Plants.
					Wash waters	02.02.01	Untreated wash waters and sludges from washing and cleaning from abattoirs, poultry preparation plants, rendering plants, or fish preparation plants only.
					DAF Sludge from - DAFF T3	02.02.04	Sludges from on-site effluent treatment plant from abattoirs, poultry preparation plants, rendering plants or fish preparation plants only.
					DAF Sludge From - DAFF Baythorpe	02.02.04	
					Lagoon Water	02.02.01	Untreated wash waters and sludges from washing and cleaning from abattoirs, poultry preparation plants, rendering plants, or fish preparation plants only.
					Sludge Cake	02.02.04	Sludges from on-site effluent treatment plant from abattoirs, poultry preparation plants, rendering plants or fish preparation plants only.

GH By Products (Derby) Ltd	Waste Written Information Record			
Environmental Management System				
Document Reference:	Issue No.	Issue Date:	Review Date:	Approved By:
EM 03-009	1	22.03.19	22.03.20	Alan Asker

Foyle Gloucester	Forest Vale Road, Forest Vale Industrial Estate, Cinderford, GL14 2PH	Not Permitted by the EA	-	10.11	Gut Content	02.02.02	Blood and gut contents from abattoirs, poultry preparation plants, rendering plant or fish preparation plants only
Park Farm	Park Farm, Gainsborough Road, Willingham- by-Stow, DN21 5J	Not Permitted by the EA	-	0150	Farm Tank Slurry	02.01.99	Slurry and manure and soiled bedding from any premises except abattoirs, soiled biodegradable bedding not made from plant tissue, soiled bedding desiccants only

By transferring the waste to the deployment site for land spreading under the Environmental Permit referenced EPR/GB3804KW, WASTE PRODUCER confirm that they have fulfilled their duty to apply the waste hierarchy as required by Regulation 12 of the Waste (England and Wales) Regulations 2011

G.H.By Products Derby) LTD (Transferee)

Company Address	G.H. By Products (Derby) LTD, The Croft, Morton Road, Pilsley, Chesterfield, S45 8EE
Waste Carrier Details	CBDU91796 Carrier / Broker / Dealer. Waste transferred in tankers.
Quantity of Waste to be Transferred	See permitted deployment for maximum quantities to be spread. Volume of waste streams spread to the fields covered by the deployment will be provided by the land spreader following the utilisation of the deployment.
Deployment Details	
Permit Holder	G.H. By Products (Derby) LTD
Company Address	The Croft, Morton Road, Pilsley, Chesterfield, S45 8EE

GH By Products (Derby) Ltd	Waste Written Information Record			
Environmental Management System				
Document Reference:	Issue No.	Issue Date:	Review Date:	Approved By:
EM 03-009	1	22.03.19	22.03.20	Alan Asker

EA Environmental Permit Reference	SRP 2010 No4 EPR/GB3804KW
Deployment Reference	EPR/ GB3804KW /DXXX– (Engreen Reference P171-DXXX)
Deployment Address	XXXXXX
Standard Industry Classification (SIC)	38210
Declaration	
Signed by A Hughes and Son (Skellingthorpe) Ltd (Transferor)	
Print Name and Date	
Signed by G.H.By Products (Derby) LTD (Transferee)	
Print Name and Date	

GH By Products (Derby) Ltd	Storage Vessel Inspection Form				
Environmental Management System					
Document Reference:	Issue No.	Issue Date:	Review Date:	Approved By:	
EM 03-010	1	22.03.19	22.03.20	Alan Asker	

Inspection Form Completion Instructions

- i. Waste storage vessels are to be inspected on a weekly basis as a minimum;
- ii. Add details of the stores inspected e.g. Park Farm Store;
- iii. Date to be added in the top left corner of the form;
- iv. For each storage vessel and any associated pipework, please insert a '✓' or a 'x' or comment in the relevant box, in answer to the following inspection questions:

1.	Are all containers serviceable and without leaks?	2.	Storage levels checked, and minimum freeboard has been maintained – 0.3 metres for stores?
3.	Confirm no drips and spills near (un)-loading area?	4.	Spill kit in place? Note on form where replenishments are required.
5.	Pipework and connection points serviceable without leaks?	6.	Where the store is empty following expiry / utilisation of a deployment enter today's date or if not applicable, enter n / a.
7.	Confirm there is no odour at a level likely to cause a nuisance.?		

- v. Where the answer is an 'x', please complete an Incident and Corrective Action Form EM 03-001 and provide the applicable reference to the completed form, within the table below.
- vi. Print name, sign and add date when the form is completed.
- vii.

	Storage Vessel Inspected:	Storage Vessel Inspected:	Storage Vessel Inspected:	Storage Vessel Inspected:	Storage Vessel Inspected:	Storage Vessel Inspected:
Date:						
Inspection Question						
Q1						
Q2						
Q3						
Q4						
Q5						
Q6						
Q7						
ICARF Ref:						

Print Name:

Signature:

Date:

GH By Products (Derby) Ltd		Deployment Schedule		
Environmental Management System				
Document Reference:	Issue No.	Issue Date:	Review Date:	Approved By:
EM 03-011	1	22.03.19	22.03.20	Alan Asker

Form Updated: 22.03.19

Source Materials Inventory

The table below details the waste streams that can be delivered to site based stores and have been included within the site's deployment applications, in order to provide a source material inventory as required by the Environment Agency's Odour Management Plan guidance. This table will be reviewed following each deployment application.

Table 1 – Source Materials Inventory									
Waste	Waste Producer	Address	E.W.C.	Waste Description	Nature of odours – fresh material	Nature of odours – degraded material	Odour Intensity	Deployment / Site Reference where the waste stream can be spread / stored	Waste Stream contains high readily available N (Y / N)
Condensate	A Hughes and Son (Skellingthorpe) Ltd	Jerusalem Farm, Jerusalem Road, Skellingthorpe, Lincoln LN6 4RL	02.02.99	Processed ABP Material from Rendering Plants	Cooked bone meal type odour	More distinct bone meal type odour	4 / 5	All Agreed Deployments	Yes
Wash waters			02.02.01	Untreated wash waters and sludges from washing and cleaning from abattoirs, poultry preparation plants,	Slurry/ Waste waters from food processing	More distinct slurry odour	3	All Agreed Deployments	No

GH By Products (Derby) Ltd		Deployment Schedule			
Environmental Management System					
Document Reference:	Issue No.	Issue Date:	Review Date:	Approved By:	
EM 03-011	1	22.03.19	22.03.20	Alan Asker	

Table 1 – Source Materials Inventory									
Waste	Waste Producer	Address	E.W.C.	Waste Description	Nature of odours – fresh material	Nature of odours – degraded material	Odour Intensity	Deployment / Site Reference where the waste stream can be spread / stored	Waste Stream contains high readily available N (Y / N)
				rendering plants, or fish preparation plants only.					
DAFF T3			02.02.04	Sludges from on-site effluent treatment plant from abattoirs, poultry preparation plants, rendering plants or fish preparation plants only.	Slurry/ Waste waters from food processing	More distinct slurry odour	3	All Agreed Deployments	No
DAFF Baythorpe				rendering plants or fish preparation plants only.	Slurry/ Waste waters from food processing	More distinct slurry odour	3	All Agreed Deployments	No

GH By Products (Derby) Ltd		Deployment Schedule			
Environmental Management System					
Document Reference:	Issue No.	Issue Date:	Review Date:	Approved By:	
EM 03-011	1	22.03.19	22.03.20	Alan Asker	

Table 1 – Source Materials Inventory									
Waste	Waste Producer	Address	E.W.C.	Waste Description	Nature of odours – fresh material	Nature of odours – degraded material	Odour Intensity	Deployment / Site Reference where the waste stream can be spread / stored	Waste Stream contains high readily available N (Y / N)
DAF Cake			02.02.04	Sludges from on-site effluent treatment plant from abattoirs, poultry preparation plants, rendering plants or fish preparation plants only.	Slurry/ Waste waters from food processing	More distinct slurry odour	3	All Agreed Deployments	No
Lagoon Water			02.02.01	Untreated wash waters and sludges from washing and cleaning from abattoirs, poultry preparation plants, rendering plants, or fish preparation plants only.	Slurry/ Waste waters from food processing	More distinct slurry odour	3	All Agreed Deployments	No

GH By Products (Derby) Ltd		Deployment Schedule			
Environmental Management System					
Document Reference:	Issue No.	Issue Date:	Review Date:	Approved By:	
EM 03-011	1	22.03.19	22.03.20	Alan Asker	

Table 1 – Source Materials Inventory									
Waste	Waste Producer	Address	E.W.C.	Waste Description	Nature of odours – fresh material	Nature of odours – degraded material	Odour Intensity	Deployment / Site Reference where the waste stream can be spread / stored	Waste Stream contains high readily available N (Y / N)
Farm Tank	Park Farm	Park Farm Gainsborough Road Willingham-by-Stow DN21 5JX	02 01 99	slurry and manure and soiled bedding from any premises except abattoirs, soiled biodegradable bedding not made from plant tissue, soiled bedding desiccants only	Slurry/ Waste waters from food processing	More distinct slurry odour	3	All Agreed Deployments	No
Gut Content	Foyle Gloucester	Forest Vale Road, Forest Vale Industrial Estate, Cinderford, GL14 2PH	02.02.02	Blood and gut contents from abattoirs, poultry preparation plants, rendering plant or fish preparation plants only	Pungent manure / slurry odour.	More distinct manure / slurry odour	3	All Agreed Deployments	No
Notes:									

GH By Products (Derby) Ltd		Deployment Schedule		
Environmental Management System				
Document Reference:	Issue No.	Issue Date:	Review Date:	Approved By:
EM 03-011	1	22.03.19	22.03.20	Alan Asker

Table 1 – Source Materials Inventory									
Waste	Waste Producer	Address	E.W.C.	Waste Description	Nature of odours – fresh material	Nature of odours – degraded material	Odour Intensity	Deployment / Site Reference where the waste stream can be spread / stored	Waste Stream contains high readily available N (Y / N)
<p>1. Odour Intensity – Score based on the following Key taken from the Environment Agency’s H4 Odour Management, How to comply with your environmental permit. 0 No odour, 1 Very faint odour. 2 Faint odour. 3 Distinct odour, 4 Strong odour, 5 Very strong odour, 6 Extremely strong odour.</p>									

GH By Products (Derby) Ltd	Environment Agency Notification Form			
Environmental Management System				
Document Reference:	Issue No.	Issue Date:	Review Date:	Approved By:
EM 04-001	1	22.03.19	22.03.20	Alan Asker

- **Permit Reference:** _____
- **Environment Agency Deployment Number:** _____

The Environment Agency shall be notified via their pollution hotline 0800807060 without delay following the detection of:

'any malfunction, breakdown or failure of equipment or techniques, accident or emission of a substance not controlled by an emission limit which has caused, is causing or may cause significant pollution'

These pages outline the written confirmation of actual or potential pollution incidents and breaches of emission limits that shall be submitted to the EA within 24 hours.

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 PPC Regulations.

Part A

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

<small>(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</small>	
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	

Prepared By:	Engreen Environmental Consultants Ltd	Page 1 of 3
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GH By Products (Derby) Ltd	Environment Agency Notification Form			
Environmental Management System				
Document Reference:	Issue No.	Issue Date:	Review Date:	Approved By:
EM 04-001	1	22.03.19	22.03.20	Alan Asker

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	

GH By Products (Derby) Ltd	Environment Agency Notification Form			
Environmental Management System				
Document Reference:	Issue No.	Issue Date:	Review Date:	Approved By:
EM 04-001	1	22.03.19	22.03.20	Alan Asker

Permit Reference: _____

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	

* authorised to sign on behalf of A Hughes and Son (Skellingthorpe) Ltd

GH By Products (Derby) Ltd		Land Spread Report		
Environmental Management System				
Document Reference:	Issue No.	Issue Date:	Review Date:	Approved By:
EM 04-002	1	22.03.19	22.03.20	Alan Asker

Land Holder Details	
Name	
Address	
Postcode	
Contact Number	
Written Waste Information Attached (✓ / ✗)	

Waste Spread Summary							
Fields Spread On	Field Size (Available ha)	EA Deployment Ref	Spreading Date	Previous Crop	Next Crop	Tonnes of Waste Applied	t / ha

Field	Nutrient Loading Summary			Nutrients Still Required (k.g. / ha)
		Nutrient Requirement (k.g. / ha)	Application of Waste to Field (kg / ha)	
	Total Nitrogen (kg/ha)			
	Phosphate (kg/ha)			
	Potash (kg/ha)			

GH By Products (Derby) Ltd	Land Spread Report			
Environmental Management System				
Document Reference:	Issue No.	Issue Date:	Review Date:	Approved By:
EM 04-002	1	22.03.19	22.03.20	Alan Asker

Spreading Record						
	Waste Stream and EWC	Waste Ref	Waste Ref	Waste Ref	Waste Ref	Waste Ref
Field Reference	Date	Tonnes	Tonnes	Tonnes	Tonnes	Tonnes

Declaration			
	Signed	Print Name	Date
Record completed by GH By-Products (Derby) Ltd			
Record received by:			

GH By Products (Derby) Ltd		Emergency Contact List		
Environmental Management System				
Document Reference:	Issue No.	Issue Date:	Review Date:	Approved By:
EM 05-001	1	22.03.19	22.03.20	Alan Asker

Emergency Contact Listing

Name (of Service)	Address/ Contact	Telephone No.
Ambulance	Switch Board	999
Fire Brigade	Switch Board	999
	Non – Emergency	01522 582222
Police	Switch Board	999
	Non – Emergency	01522 882222
Environment Agency	Switch Board	08708 506 506 (Mon – Fri 8am – 6pm)
	Switch Board	0800 807060 (24 Hours)
Director	Gary Hancock	07831806356
Operations Manager / TCM	Alan Asker	07584351354
Site Manager / Deputy TCM	Matt White	07960036766
HSE	Helpline	0845 300 99 23
Engreen Environmental Consultants / Deputy TCM	Edward Bennett	01257 791155 / 07872603655
Andrew Holmes	T.R. Holmes Land Spread Contractor	07973120620
Derek Small	Small's Land Spread Contractor	07710420224

GH By Products (Derby) Ltd	Written Waste Information Schedule			
Environmental Management System				
Document Reference:	Issue No.	Issue Date:	Review Date:	Approved By:
EM 05-003	1	22.03.19	22.03.20	Alan Asker

Waste Producer	Waste Producer Address	Waste Producer Standard Industry Classification	Waste Stream	List of Wastes Code	Waste Description
A Hughes and Son (Skellingthorpe) Ltd	A Hughes and Son (Skellingthorpe) Ltd Jerusalem Farm, Jerusalem Road, Skellingthorpe, Lincoln LN6 4RL	38210	Condensate	02.02.99	Processed ABP Material from Rendering Plants
			Wash waters	02.02.01	Untreated wash waters and sludges from washing and cleaning from abattoirs, poultry preparation plants, rendering plants, or fish preparation plants only.
			DAFF T3	02.02.04	Sludges from on-site effluent treatment plant from abattoirs, poultry preparation plants, rendering plants or fish preparation plants only.
			DAFF Baythorpe		
			DAF Cake	02.02.04	Sludges from on-site effluent treatment plant from abattoirs, poultry preparation plants, rendering plants or fish preparation plants only.
			Lagoon Water	02.02.01	Untreated wash waters and sludges from washing and cleaning from abattoirs, poultry preparation plants, rendering plants, or fish preparation plants only.
Park Farm	Park Farm, Gainsborough	0150	Farm Slurry	02 01 99	slurry and manure and soiled bedding

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GH By Products (Derby) Ltd	Written Waste Information Schedule			
Environmental Management System				
Document Reference:	Issue No.	Issue Date:	Review Date:	Approved By:
EM 05-003	1	22.03.19	22.03.20	Alan Asker

Waste Producer	Waste Producer Address	Waste Producer Standard Industry Classification	Waste Stream	List of Wastes Code	Waste Description
	Road, Willingham-by-Stow, DN21 5JX				from any premises except abattoirs, soiled biodegradable bedding not made from plant tissue, soiled bedding desiccants only
Foyle Gloucester	Forest Vale Road, Forest Vale Industrial Estate, Cinderford, GL14 2PH	10.11	Gut Content	02.02.02	Blood and gut contents from abattoirs, poultry preparation plants, rendering plant or fish preparation plants only

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GH By Products (Derby) Ltd	Fugitive Emissions Monitoring Programme Schedule			
Environmental Management System				
Document Reference:	Issue No.	Issue Date:	Review Date:	Approved By:
EM 05-004	1	22.03.19	22.03.20	Alan Asker

Store Reference	Store Location	Type of Store	Max Volume on Site	Security Measures	Inspection Frequency
Deployment Field Stores					
Park Farm Tank	Park Farm	Farm Tank	1,250	Located on a secure farm	Weekly
Field Heaps	See location plans for agreed deployments.	Field Heap	As per agreed benefit statement.	Located away from public view.	Weekly when deployed.
Nurse Tanks	See location plans for agreed deployments.	Nurse Tank	30 t per tank	Located away from public view. Valves kept locked.	Weekly when deployed.

GH By Products (Derby) Ltd	Training Matrix				
Environmental Management System					
Document Reference:	Issue No.	Issue Date:	Review Date:	Approved By:	
EM 07-001	1	22.03.19	22.03.20	Alan Asker	

Number	Title	Director	Operations and Environmental Manager	TCM	Land Spread Ops / Contractors	Wagon Drivers
-	Standard Rules Permit 2010No4	✓	✓	✓	-	-
EM 00	System Index	✓	✓	✓	✓	✓
EM 01-001	Environmental Policy	-	✓	✓	-	-
EM 01-002	Environmental Accident Management Plan	-	✓	✓	✓	-
EM 01-003	Odour Management Plan	✓	✓	✓	✓	-
EM 01-004	Organisation Structure and Responsibilities	-	✓	✓	-	-
EM 01-005	Fugitive Emissions Monitoring Programme	-	✓	✓	-	-
EM 02-001	Overarching Procedure Requirements	-	✓	✓	-	-
EM 02-002	Emergency and Incident Procedure	-	✓	✓	✓	✓
EM 02-003	Spill Procedure	-	✓	✓	✓	✓
EM 02-004	Waste Acceptance Procedure	-	✓	✓	-	-
EM 02-005	Land Spread Procedure	-	✓	✓	✓	-
EM 02-006	Drivers Field Manual	-	✓	✓	✓	-
EM 02-007	Communication and Complaints Procedure	-	✓	✓	-	-
EM 02-008	Document Control Procedure	-	✓	✓	-	-
EM 02-009	Waste Procedure	-	✓	✓	-	-
EM 02-010	Odour Assessment Procedure	-	✓	✓	-	-
EM 02-011	Land Injection / Application Procedure	-	✓	✓	✓	-
EM 02-012	Waste Delivery Procedure	-	✓	✓	-	✓
EM 02-013	Waste Store Inventory Procedure	-	✓	✓	-	-
EM 03-001	Incident and Corrective Action Report Form	-	✓	✓	-	-
EM 03-002	Document Control Update Form	-	✓	✓	-	-
EM 03-003	Complaints Record	-	✓	✓	-	-
EM 03-004	Drivers Record Sheet	-	✓	✓	✓	-
EM 03-005	Odour Monitoring Form	-	✓	✓	-	-
EM 03-006	Audit and Document Review Form	-	✓	✓	-	-
EM 03-007	Field Assessment Form	-	✓	✓	-	-
EM 03-008	Land Spread Inventory	-	✓	✓	-	-
EM 03-009	Waste Written Information Record	-	✓	✓	-	-
EM 03-010	Storage Vessel Inspection Form	-	✓	✓	-	-
EM 03-011	Deployment Schedule	-	✓	✓	-	-
EM 04-001	Environment Agency Notification Form	-	✓	✓	-	-
EM 04-002	Land Spread Report	-	✓	✓	-	-
EM 05-001	Emergency Contact List	-	✓	✓	✓	✓
EM 05-003	Waste Written Information Schedule	-	✓	✓	-	-
EM 05-004	Fugitive Emissions Monitoring Programme Schedule	-	✓	✓	-	-

GH By Products (Derby) Ltd	Training Record				
Environmental Management System					
Document Reference:	Issue No.	Issue Date:	Review Date:	Approved By:	
EM 07-002	1	22.03.19	22.03.20	Alan Asker	

Name						
Position						
EMS Document Reference	EMS Document Title	Issue Number	Issue Date	Date of Training	Signature to confirm understanding and implications of the documentation / completion of training.	
					Trainee	Management