

Project details	Environmental Permit Application Cleantank Limited – Amsterdam Road Recycling Facility EPR/KB3607SG/A001
Applicant details	Cleantank Limited Amsterdam Road Hull Amsterdam Road Hull HU7 0XF
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1 Introduction

Cleantank Ltd (the applicant) has requested that Reva Environmental Ltd (the agent) prepares an Environmental Permit (EP) application, for its recycling facility at Amsterdam Road, Sutton Fields Industrial Estate, Hull, Humberside, HU7 0XF.

The facility will operate a two-line physical waste treatment activity for the recovery of plastic from hazardous and non-hazardous empty packaging that cannot be reconditioned, supported by associated activities governing waste acceptance, storage, handling, and onward transfer of the treated material (product).

Question 3d of Part B2 of the EA new bespoke installation application form requires information to be provided about the Environmental Management System (EMS), including confirmation of what, if any, standard it is certified to. The applicant is a company that operates under Clean Eco Group; and the management team are the same as for a sister company, Clean Pak Limited, that operates a similar bespoke waste installation at Cumberland Street, Hull (EPR/GB3209MW). That site is operated in accordance with a set of internal documents and procedures that comprise the integrated management system (IMS) generated by Clean Eco Group. The IMS has been written in accordance with ISO 9001 (quality), ISO 14001 (environment) and ISO 45001 (health and safety). That system has been accredited (by CfA, a UKAS accredited body) to ISO 14001. A summary of that system was provided with the EP application for Amsterdam Road as it will be implemented at this site, with a review ensuring any amendments are made that are required to reflect the reduced activities.

This EMS Summary follows the headings in the EA guidance 'develop a management system: environmental permits', and signposts to the location of information within the ISO 14001 EMS Summary pages. The latter is set out as per the headings in ISO 14001 (Aspects and Impact, Legal and other requirements etc.) with 'process key stages' set out under each.

2 Site Infrastructure Plan

A number of site plans have been produced for the site, primarily for the purposes of the EP application (EPR/KB3607SG/A001). These are considered to form part of the EMS and include:

- Site Location Plan. This shows the location of the site and the EP boundary.
- Site Layout Plan. This identifies features/infrastructure, both internally and externally within the EP boundary. This includes the proposed process lines, waste storage, site boundary, yard area, emission points, vehicle access and exit points.
- Site Setting. This shows the location of the site relative to potentially sensitive receptors including watercourses, residential, commercial and industrial premises, and habitat features.
- Site Drainage Plan. This shows the drainage network at the site, including locations of manhole covers and drains.
- Fire Prevention Plan. This shows the site layout with fire detection, prevention and other emergency features such as fire exits marked up.

In addition to this, a separate plan is kept on site that identifies the location of mains water and electricity supply to the site, routes around the site and the location of any isolating switches, stop valves etc. in addition to other features such as the location of spill kits and the emergency assembly point(s).

3 Site Operations

The site operates as a plastic recycling facility, whereby it accepts hazardous and non-hazardous empty packaging (e.g. IBCs, small plastics) that cannot be reconditioned, to enable plastic recycling by subjecting it to physical treatment comprising shredding, granulation and cleaning. The materials are those that have been discarded or don't pass quality assurance (QA) tests for being reconditioned; instead they are shredded, granulated and cleaned so that the processed materials

can be recovered.

The physical treatment in Building 2 takes place in up to two lines that run in parallel (and can run independently from each other). If only one line is operational, this can process batches of IBCs and drums/small containers; if both lines are operational it is likely that one will be dedicated for IBCs and one for drums/other containers. Following processing in Building 2 the material is considered to be a product not a waste. It can be transferred off site in this state as a product.

3.1 Operational Overview

IBCs are loaded up on the raised platform on Line 1 and moved via rollers to a location on the platform where they can be de-bottled, to remove the plastic liner from the metal cage. The metal cage is either placed in the waste area of the yard as scrap metal or placed in Pile 2 if it is reusable. The liner is then cut manually and any residual content allowed to drain into an IBC positioned below the platform. The liner is then ready for treatment in either Line 1 or Line 2. Small containers will be checked for the presence of any residual contents. If required, containers will be drained into a dedicated container, or into the same IBC as above, if compatibility checks deem this to be acceptable.

Both IBCs and small plastics are conveyed into the shredder unit. IBCs are loaded from the conveyor off the platform whilst small plastics and drums will be manual loaded onto the conveyor system. The shredder is a dry system and is fully enclosed. It consists of a rotor with a hydraulic ram that pushes the material against the rotor in order for it to be cut. The screen size allows the material to be processed in the subsequent granulator.

Waste is conveyed into the granulator unit where it is further processed to reduce its size and improve uniformity.

The shredded and granulated waste is then transferred through a pre-wash unit. Water for the pre-wash system is obtained from the hotwell of the wider site boiler system (this contains the warm condensed steam). Water from the hotwell is pumped to the granulator and the auger screws to facilitate a chemical clean (5% caustic solution). This water is recirculated via a vibrating sieve back into the hotwell and re-used in the pre-wash system. When the water become 'dirty' and sludges/solids build up, this is removed and stored (in IBCs) for transfer off site for disposal. The water itself can be reused for a finite period of time; then is stored appropriately and transferred off site for aqueous waste disposal.

Regular checks are undertaken to ensure that operations are being undertaken in accordance with operational procedures.

3.2 Risk Assessment

The facility is operated in accordance with the ERA provided in the EP application (Appendix H, ref. DLR_2020.01/05_v2). This is a qualitative risk assessment which identifies the potential hazards, their pathways to causing harm, and the likelihood of them happening alongside the consequences if they do.

This is further augmented by an Aspects and Impacts Assessment, completed in accordance with Section 6.1 of the EMS, Process Key Stages 4 to 6. The output from this assessment is used to determine the most significant aspects and impacts in order to set environmental objectives and targets (Section 6.4 of the EMS).

3.3 Storage of Waste

Wastes stored at the site are limited to those allowed to be received under the EP and process outputs, and are defined in the EP by EWC code and basic description. Waste storage is only in the designated bays in the yard area, shown on the Site Layout Plan.

Details of what waste can be stored where are within the FPP which forms part of the EMS.

This falls under Section 6.6 of the EMS (Operational Control), Process Key Stage 2, in relation to the control of incoming waste (planning, receipt, sorting, storage and handling). This Key Stage also covers off-site transfers of waste e.g. drained residues, spent filter material, scrap metal, general waste etc.

3.4 Waste Acceptance

Cleantank operates in accordance with procedures for both pre-acceptance and waste acceptance. Compliance with these, ensures that waste arriving at the site is as expected, as described in the accompanying duty of care paperwork, and is therefore permitted for acceptance, storage and processing.

This falls under Section 6.6 of the EMS (Operational Control), Process Key Stage 2, in relation to the control of incoming waste (planning, receipt, sorting, storage and handling).

3.5 Fire Prevention Plan

The site will store potentially combustible waste. A Fire Prevention Plan (FPP) has been written for the site, and submitted with the EP application (Appendix G, ref. DLR_2021.02/05). This follows the EA guidance and sets out the risks of fire, how fire is prevented and how fires will be managed if one occurs.

This is further augmented by an Environmental Emergency Action Plan, completed in accordance with Section 6.7 of the EMS, Process Key Stages 1 to 3. The appointment of fire wardens ensures that there are sufficient staff with specific roles in the event of an environmental emergency. All other team members are provided with awareness instruction and training (e.g. fire extinguisher use) where required.

4 Site and Equipment Maintenance Plan

Records of inspections, repairs and maintenance are kept on site, and used to verify that those checks have been undertaken in accordance with the EMS. The scheduling of maintenance is either prescribed by:

- The supplier/manufacture of the equipment
- Relevant legislation (e.g. inspection of fire-fighting equipment)
- Other relevant guidance (e.g. sector guidelines/best practice).

Regular checks are undertaken to ensure that maintenance and inspection is being carried out, and to ensure that the integrity of equipment is maintained. This falls under Section 6.6 Operational Control and a preventative maintenance procedure/plan is maintained in accordance with Process Key Stages 4 to 7.

5 Contingency Planning

The details provided in EP documents, site plans, risk assessment, and the majority of the EMS relate to measures that are in place during 'normal' operations i.e. when the facility can be operated as it is designed to do. The Aspects and Impacts Assessment, completed in accordance with Section 6.1 of the EMS (Process Key Stages 4 to 6) includes consideration of abnormal (failure) scenarios.

A contingency plan is required to address the scenario when the facility cannot be operated in this way. There are many reasons why this could occur including, but not limited to, the following:

- Lack of staffing leading to inability to collect/receive/transfer waste
- Natural events (storms, floods, pandemics etc.) leading to closure of site or increased waste across existing contracts that exceeds the permitted site capacity

- Loss of water or mains power

In the event of the facility being unable to continue 'normal' operations, Clean Tank has a contingency plan in place which will be activated to ensure that waste can continue to be managed appropriately.

6 Accident Prevention and Management Plan

The EMS includes an accident management plan (AMP) which follows the EA guidance. It is reviewed on a regular basis and also updated as required following any incidents, changes to process, or to reflect changes in legislation or best practice. It sets out the potential accidents that may occur as a result of processing waste, identifies the mitigation measures in place to prevent accidents, and sets out the action plan in the event of an incident; this is the Environmental Emergency Action Plan which falls under Section 6.7 of the EMS (Emergency Preparedness and Response). Process Key Stages 1 to 3 relate to emergency planning, where potential accident scenarios are derived from the ERA and used to establish the Environmental Emergency Action Plan. It builds on the ERA for the site, which in part itself satisfies part of the EA guidance on accident management in terms of defining control measures that would prevent an accident, but goes a step further and takes the hazard information from the ERA and aligns it with potential accidents that could result in harm to human health and/or the environmental.

Waste stored at the facility is limited to those allowed to be received under the EP and are defined in the EP by EWC code and basic description. The dedicated waste storage location is shown on the Site Layout Plan. Site procedures require waste acceptance and tracking processes to be followed. As a result, in the event of an emergency, the operator can identify (and is able to provide the emergency services with) details of the waste present on site at the time of the incident (estimated quantity, source/producer).

Training is provided to the operational staff; roles and responsibilities are clearly defined.

An incident reporting system enables clear reporting and investigation of incidents and is filed alongside any supporting information e.g. accident book record, witness statement, third party communications etc.

7 A Changing Climate

Whilst the existing plans for the facility are based on the existing climate, it is recognised that a changing climate may introduce conditions that could affect operations in the future. The following changes could reasonably be expected:

- Higher average temperatures
- More heat waves and hot days
- Rising sea levels
- Changes in rainfall patterns and intensity
- More storms

The UK Climate Projections (UKCP) provides up to date information of these possible changes. This provides projections on a localised basis. The climate change visualisation tool has been used to identify the potential changes in the local area to the Amsterdam Road Recycling Facility and this has been recorded on the relevant (location-defined) risk assessment template.

The climate change risk assessment, as for other management system documents, is reviewed on a regular basis and updated if required.

8 Complaints Procedure

The complaints procedure follows the guidance on management systems for environmental permits and includes measures to be taken to address any concerns, near misses, potential for or actual pollution whether that is to the land, air, water or a perceived nuisance to staff, public and neighbours. It sets out how the operator will receive and record compliant, investigate them, and act upon them.

This complaints procedure, as for other management system documents, is reviewed on a regular basis and updated if required.

9 Managing Staff Competence and Training Records

EA guidance requires the operator of a permitted facility to have a training system in place for all relevant staff that includes EP awareness for their work activities; awareness of potential environmental effects from operation under normal and abnormal circumstances, awareness of need to report deviation from the EP, and prevention of accidental emissions and action to be taken when they occur.

Given the nature of the waste being accepted and the simplicity of the treatment process, is considered that for the majority of individuals their impact is likely to be minor and awareness training (both new starter induction and refresher training) is sufficient. The awareness training focuses on the fact the site has an EP and the key conditions of that EP e.g. waste acceptance, storage, and emergency scenarios such as spillages.

Contractors that are engaged to work on the site will receive a site induction prior to undertaking the work.

Identification of training needs and management of training for all staff will be the responsibility of the defined Technically Competent Manager. Records of all training will be kept, including any tests/exams that verify the success of that training.

There are several references to training in the EMS as follows:

- Section 6.6 Operational Control: Process Key Stage 5
- Section 6.7 Emergency Preparedness and Response: Process Key Stage 4
- Section 6.8 Monitoring and Measurement: Process Key Stage 7

Training and competency is primarily covered in Section 6.6 of the EMS by way of ensuring personnel are trained and therefore able to effectively retain operational control and minimise the potential for impacts on the environment. The appointment of fire wardens ensures that there are sufficient staff with specific roles in the event of an environmental emergency.

Training includes making all employees aware of the EMS policy, manual and supporting documents, and their contribution to the effectiveness of it.

10 Keeping Records

Records pertinent to the operation of the site will be kept; this includes documents demonstrating compliance with the EMS (including operational procedures, maintenance requirements, accidents, incidents, non-conformances and complaints), updates to site documents (including site condition report, specific management plans), and other records required by the EP (including waste returns, environmental monitoring data, duty of care checks etc.).

There are multiple references to the retention of records in the EMS as follows:

- Section 6.3 Legal & Other Requirements and Regulatory Compliance: Process Key Stages 1 and 5

- Section 6.4 Objectives, Targets and Programme: Process Key Stage 4
- Section 6.5 Communication: Process Key Stages 4, 5, 7 and 8
- Section 6.6 Operational Control: Process Key Stages 4, 7 and 8
- Section 6.6.1 Management of Outgoing Waste: Process Key Stages 1, 5 and 7
- Section 6.7 Emergency Preparedness and Response: Process Key Stages 7 and 10

In accordance with the EP all records retained will be legible, made as soon after the activity to which they relate as is reasonably practicable, and be retained for a time period as specified by the relevant legislation for each from the date they were made or (in the case of records relating to off-site environmental impacts and matters that affect the condition of the land and groundwater within the EP boundary) until the EP is surrendered.

If records are amended, the original must remain legible or be able to be retrieved. EP records will be kept on site.

A copy of the EP is kept at the site, both in hard copy and electronically, and all staff have access to it and to a copy of the Management System. Where changes are made to any site documentation in relation to procedures, this will be communicated to the site team for their information and understanding.

11 Management System Review

The Management System as a whole is a set of live documents; they will be subject to change during the life of the site and the EP. Changes may come about as a result of one or more of the following:

- A change in process/operations that needs to be reflected in the procedures and management plans;
- A change in procedure following an incident, accident or complaint; or
- A change in legislation or guidance that affects the activities and/or the management system.

Should any of the above occur, a review of the management system will be carried out. In any case, the EMS will be reviewed by top management at least once per calendar year.

The review is carried out to ensure that the system remains suitable for the facility, is adequate and is effective in minimising the risk of pollution from the permitted activities. It is also an opportunity to review the previous years' performance in terms of non-conformities, inspections, compliance with the EP and any external communications such as complaints.

There are multiple references to review in the EMS as follows:

- Section 6.1 Aspects and Impact: Process Key Stages 3, 6 and 8
- Section 6.3 Legal & Other Requirements and Regulatory Compliance: Process Key Stages 2, 4 and 5
- Section 6.4 Objectives, Targets and Programme: Process Key Stage 4
- Section 6.6 Operational Control: Process Key Stage 6
- Section 6.7 Emergency Preparedness and Response: Process Key Stage 9

Records of all reviews will be kept in accordance with Section 10 above.

12 Site Closure

This part of the EA management system guidance relates to operators of landfills and category A mining waste facilities so is not largely applicable. The operator will however complete the site closure parts of the Site Condition Report at the point of cessation of operations and surrender of the EP (Appendix E, Ref. DLR_2021.02/02).

13 Communication

Section 6.5 of the EMS details the procedures, processes and other documents that relate to management of communication. These are as follows:

- Process Key Stages 1, 2 and 3
- Process Key Stages 4 to 8

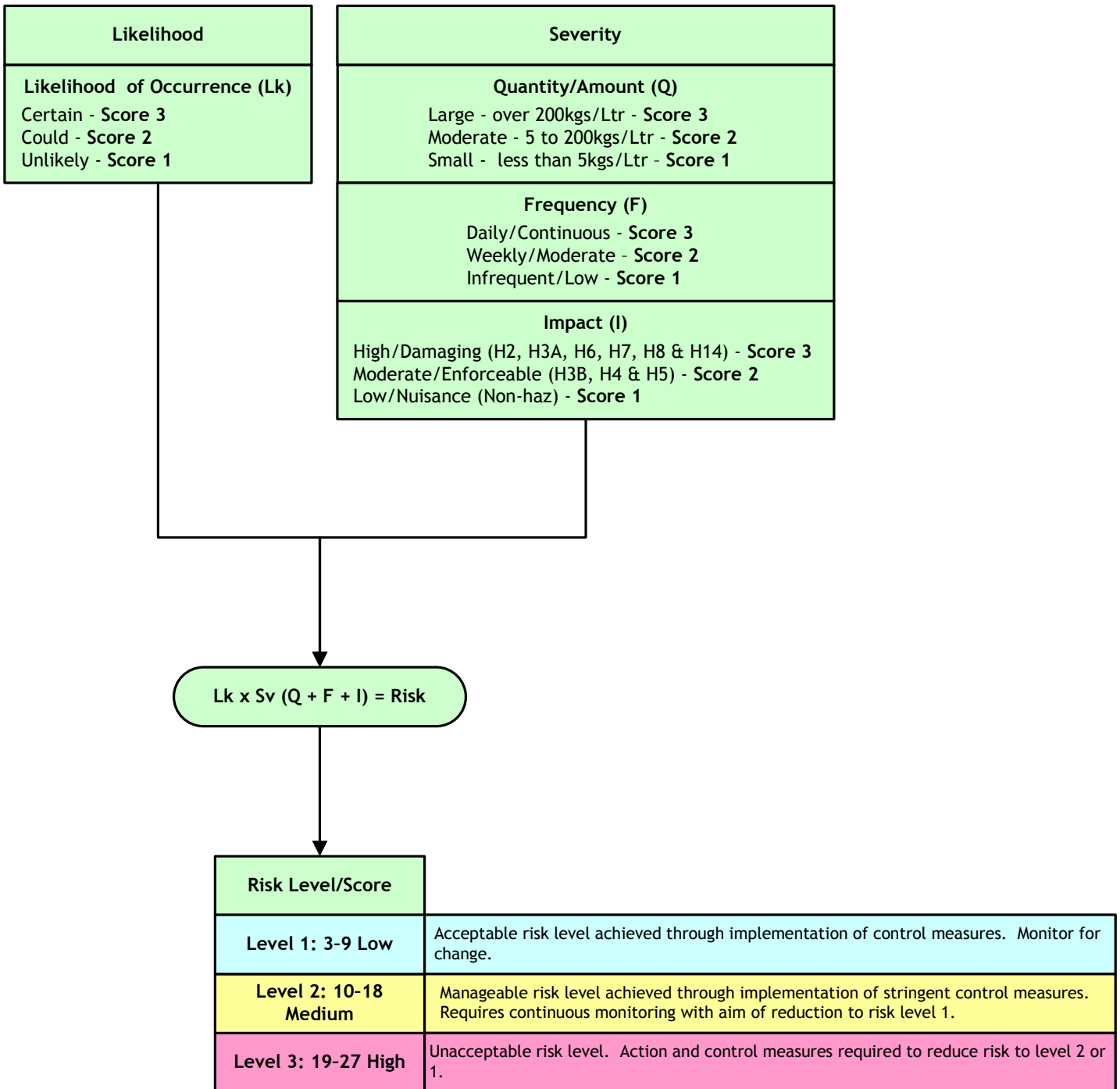
Stages 1 to 3 are concerned with internal communication and ensure that relevant environmental information is communicated to all personnel that undertake work on behalf of the company, including the environmental policy, relevant aspects, relevant objectives and targets, relevant risks, roles and responsibilities, and the environmental emergency action plan. This is supported by training and awareness provision. The EMS also makes provision for the sharing of relevant information to management and operational personnel regarding incidents, non-conformances, audit feedback, monitoring results, and any amendments made to the EMS due to changes in legislation or other environmental requirements.

Stages 4 to 8 relate to communication with external interested parties on environmental issues and set out the type of communication, the potential external parties (regulator, key customers, neighbours, local authority etc.), how to respond to those including how to determine the relevant course of action.

Aspects & Impacts

Process Key Stage		Responsibilities			Links
		EMS Management Rep	CoTC Holder		
Environmental Risk Assessment					
1	Conduct environmental risk assessment on all site activities and operations that have potential to cause pollution, environmental nuisance or breach of environmental legislation.	▼			
2	Present environmental risk assessment to show: 1. Risk assessment scope, date and risk assessor(s). 2. Pollution source, pathway and receptor. 3. Initial risk (using scoring scheme). 4. Control measures. 5. Residual risk (using scoring scheme). 6. Action required to achieve residual risk. Implement corrective and improvement action identified during risk assessment.	▼			IMS 3.2 IMS 6.2
3	Review and update environmental risk assessments to ensure continual suitability: 1. Prior to introducing change in operation, process, work practice and scope of operation. 2. Following environmental accidents, incidents and near misses. 3. Following change in legislation. 4. From lessons learned and discovery of previously unforeseen risk.	▼			
Aspects and Impacts Assessment					
4	Establish register of significant environmental aspects and rate the potential impact (again using the risk scoring scheme). Separate the register into 2 sections relative to aspect type: 1. Potentially polluting and regulatory aspects - from environmental risk assessment. 2. Positive aspects - non-polluting/regulatory aspects with potential for energy/cost saving and environmental benefits.	▼			
5	Present aspects & impacts register to reflect results of assessment to include: 1. Activity/operation/product. 2. Environmental aspect(s) applicable to the activity. 3. Environmental impact score (initial). 4. Link to regulatory consideration (regulated aspects only). 5. Control measure/action (positive aspects only). 6. Residual environmental impact score.	▼			Aspect & Impacts Register
6	Review continuing suitability of aspects & impacts following: 1. Measuring & monitoring of the EMS. 2. Changes to work practice, equipment, products & processes. 3. Impact by change in regulation. 4. External audit results/feedback (EA, NQA, clients, etc.). 5. At least every 12 months.	▼			
Environmental Management Programs					
7	Use the significant aspects & impacts as a direct influence on setting environmental objectives, targets and programmes.	▼			
8	Establish and maintain an Environmental Program for achieving environmental objectives and targets. Programme(s) must include: 1. How environmental objectives will be achieved. 2. Time scale(s). 3. Person(s) responsible. Review and amend programme(s) following: 1. Change to aspects & impacts register. 2. Change to activities/operation/products . 3. New/changed regulations and legislation. 4. Improvement initiatives.	▼		Keep record	IMS 3.2


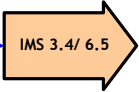
Aspects & Impacts Scoring Scheme



Legal & Other Requirements and Regulatory Compliance

Process Key Stage		Responsibilities			Links	
		EMS Management Rep	CoTC Holder			
Register of Legislation & other Requirements						
1	Maintain a register of legislation, regulatory & other requirements to identify all relevant statutory safety & environmental requirements that relate to the business to include. 1. Legislation/requirement title. 2. Requirement and impact on the business. 3. Enforcement agency.	Start			<p>The flowchart illustrates the process flow across the 'Responsibilities' columns. It starts with a pentagon in the 'EMS Management Rep' column at step 1. A vertical line of downward-pointing triangles continues through steps 2, 3, 4, 5, 6, 7, and 8. A horizontal arrow labeled 'Keep Record' points from the triangle at step 5 to a box labeled 'Register of Legislation & Other Requirements'. Another horizontal arrow labeled 'Keep record' points from the triangle at step 7 to the same box. A vertical arrow points from the top of the 'Register of Legislation & Other Requirements' box back to the pentagon at step 1. A horizontal arrow labeled 'IMS 3.7' points from the triangle at step 8 to a box labeled 'IMS 3.7'. A vertical arrow points from the 'IMS 3.7' box back to the triangle at step 8.</p>	
2	Conduct a periodic review (at least 6 monthly) of legislation, regulatory & other requirements and update the register to reflect changes or new requirements.					
3	Consult with relevant information sources to include: 1. EA notifications (NETREGS email updates, Permit updates, etc.). 2. EA web site www.environment-agency.gov.uk. 3. HSE website - hse.gov.uk - what's new & new publications. 4. Trade subscriptions/membership. 5. Grapevine.					
4	Review impact of any changes to legal requirements on the EMS, Environmental Permit, environmental aspects & impacts and management operations. Introduce changes into the company through the EMS processes and change control procedures where relevant.					
5	Record details of the periodic review and summary of any changes introduced.					
Evaluation For Regulatory Compliance						
6	Monitor compliance with relevant legislation at least 6 monthly in line with the periodic review. The compliance review process is twofold: 1. Establish compliance through feedback from regulatory enforcement visits and any prosecutions or improvement notices issued to the company. 2. Determine that arrangements and controls are in place to address the legislation and that these appear sufficient.					
7	Record compliance status in the register of legislation adjacent to the regulation entry.					
8	Raise a non-conformance report to address non-compliance with legal requirements in accordance with IMS section 3.7.					

Objectives, Targets and Programme

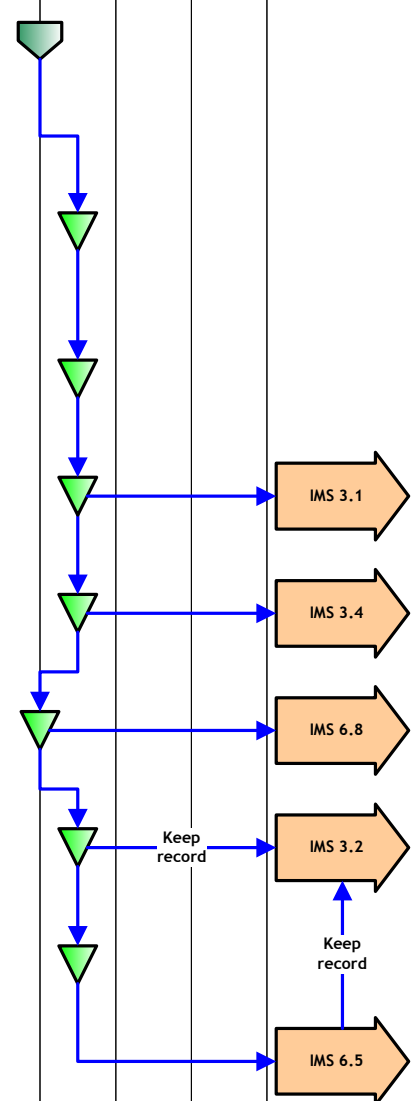
Process Key Stage	Responsibilities				Links
	Director	EMS Management Rep	CoTC Holder		
1 Establish objectives and targets for the business that are consistent with the environmental policy and scope of the business operations. Environmental objectives and targets must be measurable (where practicable) and must also consider: <ol style="list-style-type: none"> 1. Commitment to prevention of pollution. 2. Environmental permit requirements. 3. Compliance with legal requirements. 4. Continual environmental improvement. 		▼			
2 When setting and reviewing environmental objectives and targets, further consideration must be given to: <ol style="list-style-type: none"> 1. The significant environmental aspects (identified at IMS section 6.1) 2. Legal requirements. 3. Technological options. 4. Financial, operational and business needs. 5. Requirements and views of interested parties, e.g. Environment Agency, clients, etc. 6. A programme for introduction and achievement. 		▼			
3 Present the objectives and targets into the "Environmental Objectives, targets and Programme" format to include: <ol style="list-style-type: none"> 1. Objective number. 2. Date established. 3. Objective. 4. Target and timescale. 5. Means of achievement. 6. Responsibility for achievement. 7. Environmental aspect reference (from the aspects and impacts register). 		▼		→	 Environmental Objectives, targets and Programme
4 Objectives and targets must be reviewed and updated to reflect progress and to measure and monitor the extent of achievement to the programme and set new objectives where relevant. Review and update objectives and targets at least every 6 months and record the review findings in the "measure/review" column.		▼		→	Keep record
5 Objectives and targets must be approved by a Director.	▼				
6 Ensure that all personnel are made aware of the relevant environmental objectives and targets.		▼			
				→	 IMS 3.4/ 6.5

Communication

Process Key Stage		Responsibilities			Links
		Director	CoTC Holder	EMS Management Rep	
Internal Communication					
1	Communicate relevant environmental information to all personnel that perform tasks on behalf of the company: <ol style="list-style-type: none"> 1. Environmental policy. 2. Significant environmental aspects relating to their work. 3. Environmental objectives and targets relating to their work. 4. Environmental risk and the procedures relating to their work. 5. Their roles and responsibilities relating to the EMS and Environmental Permitting Conditions. 6. Environmental emergency action plan. 				
2	Communicate operational information to relevant personnel to ensure compliance with the requirements of the EMS and Environmental Permitting Conditions via training, awareness & communication processes.				
3	Communicate relevant information to management and operational personnel following: <ol style="list-style-type: none"> 1. Corrective actions from environmental incidents and non-conformity. 2. Feedback from audits and environmental monitoring. 2. Changes to the EMS or Environmental Permitting Conditions. 3. Changes in relevant legislation or other environmental requirements. 4. Preventive action and improvements to the EMS. 				
Communication With External Interested Parties					
4	Record details of relevant communications with external parties regarding environmental issues. Relevant communication includes site visits and the receipt of environmental related documentation. External parties can include EA, HSE, EHO, local authorities, key customers, neighbours or the general public.			Keep record	
5	Respond to the external party in the first instance (where relevant) and advise on course of action. Record details of responses and correspondence.				
6	Determine relevant course of action. Report complaints or incidents as non-conformance in accordance with IMS section 3.7.				
7	Determine information to be communicated to the external party (including information regarding significant environmental aspects). Consult with subject specialists and/or legal representative if required to determine company position and legal standing if required.			Keep Record	
8	Communicate the information to the external party. Maintain records of information released and subsequent action.			Keep Record	

Operational Control





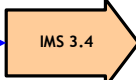



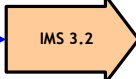



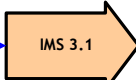

Process Key Stage	Responsibilities			Links
	COTC Holder	Operations Management/ EMS Management Rep		
1 Identify those environmental operations that require procedures to ensure they are carried out under controlled and specified conditions to ensure: <ol style="list-style-type: none"> 1. Compliance with Environmental Permitting Conditions. 2. Management and control of the significant environmental aspects. 3. Control to prevent pollution threats. 4. Compliance with environmental policy and objectives. 				
2 Operations that require control include: <ol style="list-style-type: none"> 1. Incoming waste management operations (planning, receipt, sorting, storage and handling). 2. Container processing, waste treatment processes and drum re-manufacture. 3. Waste transfers from the sites. 4. Products used and services performed on the site. 				
3 Procedures and SSoW must stipulate the specific operational criteria needed to control the activity.				
4 Produce, approve, issue and control operational procedures/SSoW in accordance with IMS section 3.1 - Control of Documents.				IMS 3.1
5 Implement and introduce operational procedures/SSoW. Ensure that relevant personnel performing operational procedures are competent and trained in the specific tasks to IMS section 3.4.				IMS 3.4
6 Monitor effectiveness of operational procedures and controls during site monitoring and measurement - IMS section 6.8.				IMS 6.8
7 Communicate relevant operational procedures to clients, suppliers and sub-contractors where needed to ensure management of significant environmental aspects.			Keep record	IMS 3.2
8 Provide operational procedures to Environment Agency where required for approval and/or inclusion into Environmental Permitting Conditions. Record communication of information - IMS section 6.5.				IMS 6.5



Operational Control - Management of Outgoing Waste

Process Key Stage	Responsibilities				Links
	EMS Management Rep	CoTC Holder	Operations Management		
Management of Waste Service Providers					
1	Perform Duty of Care assessment on all organisations removing or receiving our waste. Waste organisations must provide evidence of: <ol style="list-style-type: none"> Carrier license copy - Control of Waste (Registration of Carriers and Seizures of Vehicles) regulations. Environmental Permit number of site(s) used for the receipt, transfer and/or disposal of waste removed from our sites. Evidence can be taken from the EA "public registers" website.				
Control of Waste Generated During Operations					
2	Separate waste into material type and control as: <ol style="list-style-type: none"> Removed container residues - put to collection drum/tank - hazardous waste (stage 3 below). Metal (crushed drums & general metal) - transferred for recycling. Keep transfer notes. Contaminated metal separated from clean - hazardous waste (stage 3 below). Cardboard/paper - transfer to recycling. Keep transfer notes. Plastics - shred, granulate and transfer to recycling. Keep transfer notes. Trade on containers - transport under duty of care. Keep transfer notes. Hazardous Waste (waste chemicals/batteries/fluorescent tubes) - segregate for controlled removal to process stage 3 below. WEEE - segregate for controlled removal - keep transfer notes. Remaining non-hazardous waste that cannot currently be recycled - to general skip - transfer for disposal. Keep transfer notes. 				
Hazardous Waste					
3	Determine if waste is classified hazardous using the European Waste Code for the waste. Absolute entries (shown in red) are hazardous. Mirror entries (shown in blue) have to be assessed using the classification guide to determine if hazardous and hazard group (H1 to H14).				
4	Segregate hazardous waste groups and maintain clear identification to prevent mixing. It is illegal to mix different hazardous waste groups together.				
5	For hazardous waste to be removed, a consignment note must be used (see section 4 and 5). Premises code must be used for the consignment note number. This code is the first three letters of the site name followed by the unique sequence of numbers or letters. This code to enter the cost code codes and unique reference for the documentation.				
Waste Removal & Transfer					
6	Supervise the collection of waste from site and ensure that the vehicle and waste is fit for transport. Do not release unfit loads for transport.				
7	Complete waste transfer documentation completely before releasing waste for transport. Document waste transfer using a Duty or Care Waste Transfer note (non-hazardous waste) or Hazardous Waste Consignment Note: <ol style="list-style-type: none"> Waste producer details and collection point. Full description of the waste, type, quantity, volume, etc. Carrier removing the waste, carrier license number and intended transfer or disposal point. European Waste Classification (EWC) Code for the waste. Completion of relevant sections on a Hazardous Waste Transfer Note (i.e. premises code, EWC & hazard codes & SIC code) and consignment note number. 				

Emergency Preparedness and Response

Process Key Stage		Responsibilities				Links
		Director	CoTC Holder	EMS Management Rep		
Emergency Planning						
1	From assessment of environmental risk , establish an ‘Environmental Emergency Action Plan’. The purpose of this plan is to prevent and mitigate the environmental impact of an emergency situation.					
2	The Environmental Emergency Action Plan must identify at least: 1. Nature of potential emergency. 2. Emergency equipment and resources needed. 3. Action to be taken in event of emergency.					
3	When building emergency action steps, ensure that the measures do not compromise the health, safety and welfare of the emergency response personnel.					
Site Preparedness						
4	Appoint emergency response teams (e.g. fire squads) with specific roles in the event of an environmental emergency. Ensure that all team members are provided with awareness instruction and training (e.g. fire extinguisher use) where required relative to their role.					
5	Ensure that sufficient equipment and materials are made available in line with the emergency plan. Equipment and materials must be: 1. Correct type to deal with substances involved in a spillage (oil, paint, chemical). 2. Sufficient to contain the potential volume. 3. Located/positioned at the most appropriate point to deal with an emergency. 4. Clearly identified as emergency equipment.					
6	Ensure that emergency equipment is inspected and checked for suitability, condition and fitness for purpose on a weekly basis. Record details of inspections/checks made and any actions taken.					
7	Where practicable perform rehearsal of the emergency action plan to a pre-planned schedule. Record results of the rehearsal and any resulting actions.			Keep record		
8	Activate the emergency action plan in event of an environmental emergency situation.					
Monitoring & Review						
9	Review emergency planning arrangement for continual suitability: 1. Following emergency situations, corrective action and lessons learned following emergency situations and rehearsals. 2. Through improvement initiatives. 3. At least annually during management review.					
10	Introduce amendments into the emergency plan. Issue revised emergency plan to all current holders & locations.					
11	Introduce revisions made to the emergency plan into operations.					

Monitoring & Measurement

Process Key Stage		Responsibilities				Links
		General Manager	Supervisors / Inspectors	Management/ EMS	Operations	
1	Perform environmental monitoring and measurement to determine: <ol style="list-style-type: none"> 1. Achievement of environmental objectives & targets. 2. Compliance with the Environmental Permitting Conditions. 3. Risk controls are implemented and effective. 4. Lessons are being learnt from environmental experiences. 5. Environmental awareness is working on site. 6. Information that can be used to review and/or improve aspects of the IMS systems. 					
Proactive Monitoring						
2	Check all waste and waste containers entering the site for compliance with the acceptance policy, waste transfer description and compliance with the Environmental Permit Conditions for permitted waste type. Report all incoming container gradings. Manage non-conforming incoming waste to IMS section 3.7.					IMS 3.2
3	Conduct daily site compliance inspection and record finding/results using the compliance check list. Report any conditions, adjustments, actions, etc. in the report. Raise non-conformance for significant issues of risk and Environmental Permit Condition breaches. Sign the report to verify findings and actions.					Site Check Sheet - Daily
4	Conduct Environmental Permit Conditions compliance checks at least monthly and additional at random. Record and score results using the site check sheet. Raise non-conformance for significant issues of risk and Environmental Permit Condition breaches. Sign the report to verify findings and actions.					EP Compliance Audit Checksheet
Reactive Monitoring						
5	Report all environmental incidents (spillages, emissions, complaints and near misses) into the non-conformance system. Take relevant corrective action to IMS section 3.7.					IMS 3.7
6	Introduce relevant environmental measurement and/or monitoring to investigate and/or substantiate an environmental complaint or concern.					
General						
7	Introduce changes & improvement to working practice & site operations to address feedback from monitoring & measurement where required. Introduce changes & improvement to the EMS in accordance with IMS section 3.1.					IMS 3.1
8	Control & document corrective & preventive action to address non-conformance & improvement resulting from monitoring & measurement feedback.					IMS 3.7
9	Any measuring or monitoring equipment used must be suitably controlled and calibrated with a certificate or record of calibration - IMS 5.9					IMS 5.9

