

Environmental Management System Summary

1. This Environmental Management System (EMS) summary should be read in conjunction with application report reference DBC/EU/AW/5636/01 submitted to the Environment Agency (EA) for a bespoke Environmental Permit for the operation of an inert and excavation waste transfer station operated by DB Cargo (UK) Limited at Barking Eurohub, Box Lane, Renwick Road, Barking (the site).
2. This summary which has been prepared pursuant to Question 3d of EA Application Form Part C2 explains how the operations to be undertaken at the site under the DB Cargo EMS are consistent with the main headings in the EA guidance presented at <https://www.gov.uk/guidance/develop-a-management-system-environmental-permits#what-to-put-in-your-management-system-and-how-to-organise-it>. The headings from the EA management system guidance (the EAMS guidance) are reproduced for clarity.

What to put in your management system and how to organise it

3. The EAMS guidance states that *“If you have a number of permits they may be covered by an overall management system. You may carry out certain things in the same way at different permitted sites and you may also have site specific procedures.”*
4. The EMS for the site (Version LN_EUROHUB/EMS/v002 – Created August 2018, Reviewed January 2020) is a site specific EMS. The EMS has been prepared based on the aspects which are specific to the site and includes site specific procedures and management plans which have been developed based on the assessment of the risks associated with the activities undertaken taking into consideration the site sensitivity. The EMS includes the following sections:
 - Introduction
 - Site Description
 - Site Engineering for Pollution Prevention and Control
 - Site Infrastructures
 - Site Operations
 - Pollution Control, Monitoring and Reporting System

- Amenity Management and Monitoring
 - Site Records
5. The following site specific documents, which are included in application report reference DBC/EU/AW/5636/01 submitted to the EA for a bespoke Environmental Permit at Barking Eurohub are included in the site management system:
- Environmental Risk Assessment – Report reference DBC/EU/AW/5636/01/ERA dated September 2020
 - Dust and particulate matter emissions management plan (DEMP) for the operation of an inert and excavation waste transfer station operated by DB Cargo (UK) Limited at Barking Eurohub, Box Lane, Renwick Road, Barking – Report reference DBC/EU/AW/5636/01/DEMP dated September 2020
6. These documents are referred to later in this summary document as their contents address a number of the aspects specified in the EAMS guidance.

How to develop your management system

7. The EAMS guidance states that *“You can develop and maintain your own management system or use an environmental management system scheme or standard.”*
8. The EMS has been developed by DB Cargo based on Permit document EPR/BPGB3003GR issued for Standard Rules 2009 No 5: inert and excavation waste transfer station below 250kte determined on 17 July 2018 with reference to the EAMS guidance and with reference to the EMS’ for other similar sites operated by DB Cargo in the London area. The site specific documents listed under paragraph 5 above take into account the proposed expansion of the activities at the site and form part of the EMS.

Prepare your site infrastructure plan

9. The EAMS guidance states that *“Your management system must include a plan of your site, drawn to scale. The plan must highlight where you do the activities covered by your permits”* and goes on to describe the aspects which must be shown for sites with waste permits such as Barking Eurohub.

10. The management plan described under paragraph 5 above, which forms part of the site management system, include a range of site infrastructure plans relevant to the various aspects identified through the risk assessment as those site specific aspects which require control measures for example dust. The management plans complement the site infrastructure plan included in the EMS.

Site operations

11. The EAMS guidance states “*Break down the operations that will be carried out on your site ... into a list of activities and processes, for example unloading waste, storing waste,...List the steps you will take to prevent or minimise risks to the environment from each activity or process and type of waste. Be specific about the actions you will carry out to do this.*”

12. The management plan described under paragraph 5 above, which forms part of the site management system, describes the operations and activities that will be undertaken at the site including details of waste types and storage arrangements and provide details of the control measures which will be implemented to minimise the risks to the environment from the activities and specific waste types.

13. The EMS includes details of the roles and responsibilities of key personnel including the Terminals Manager, Technically Competent Site Manager, the Site Supervisor and site workers. The responsibilities relevant to site operations include:

- The Terminals Manager, Site Supervisor and the COTC holder are available to attend any specific incidents of compliance and non-compliance.
- Weekly recorded site perimeter inspections will be completed by the Site Supervisor.
- Regular recorded inspections of stored materials will be carried out by the Site Supervisor.
- Visual dust monitoring to be completed by the Site Supervisor.

Site and equipment maintenance plan

14. The site management system includes maintenance schedules and records for all key site infrastructure and mobile plant which are maintained according to the manufacturer's recommendations. Copies of the equipment manuals will be available for reference.

Contingency plans

15. The EMS includes details of the roles and responsibilities of key personnel including the Terminals Manager, Technically Competent Site Manager, the Site Supervisor and site workers. The EMS and management plan referred to in paragraph 5 above include contingency measures, remedial measures and action plans in the event of certain events such as receipt of a dust complaint, rejection of an unsuitable waste load or observation during the routine monitoring and site inspections of an aspect which could potentially lead to an unacceptable emission from the site. The plans include details of the actions to be taken to address the events.

Accident prevention and management plan

16. The Environmental Risk Assessment submitted to the EA as part of application report reference DBC/EU/AW/5636/01 for a bespoke Environmental Permit includes consideration of accidents including spillages, flooding, fires etc and the management plans developed for the site include details of the measures to minimise the potential for accidents and the procedures that will be followed in the event of an incident.

17. The EMS includes details of the roles and responsibilities of key personnel including the Terminals Manager, Technically Competent Site Manager, the Site Supervisor and site workers. The responsibilities include:

- The Terminals Manager, Site Supervisor and the COTC holder will attend any specific incidents of compliance and non-compliance.
- The Site Supervisor will conduct environmental inspections on aspects such as waste acceptance, dust levels and the site perimeter.
- Ensure incident reporting is completed in the Site Diary along with the relevant remedial action taken.

A changing climate

18. The EAMS guidance lists under 'A changing climate' several aspects to be considered such as '*higher average temperatures, more heat waves and hot days, rising sea levels, changes in rainfall patterns and intensity, more storms*'.
19. The management plan described under paragraph 5 above, which forms part of the site management system, presents details of procedures to be followed in the event of prolonged dry spells of weather and the aspect of the permit application documentation relevant to the discharge of trade effluent from the site presents a conservative assessment based on a 1 in 30 year 6 hour storm event. . The Environmental Risk Assessment – Report reference DBC/EU/AW/5636/01/ERA dated September 2020 submitted with application report reference DBC/EU/AW/5636/01 considers the aspects listed in the EAMS guidance and provides details, where relevant, of the mitigation that will be employed to address these aspects.

Complaints procedure

20. Details of the complaint procedure are set out in the sections of the EMS relevant to dust, odour, noise, pests and litter. The relevant sections include details of how complaints are investigated and provide examples of the actions that are taken to address complaints.

Managing staff competence and training records

21. The EMS includes details of the roles and responsibilities of key personnel including the Terminals Manager, Technically Competent Site Manager, the Site Supervisor and site workers. The responsibilities include:
- The briefing of plant operators on the correct site operational practices including spillage and reporting procedures, pollution control, dust, odour and noise.

Keeping records

22. All documentation required to be retained under the Environmental Permit is retained for the necessary time period including Duty of Care documentation. Records of site inspections and audits are retained in the site file.

Review your management system

23. The EMS and the procedures within the EMS are subject of periodic review taking into consideration the results of the monitoring and site inspections and any changes to the activities at the site. The latest revision of the EMS was undertaken in January 2020.

Site closure

24. This aspect of the EAMS guidance is relevant only to sites which hold a permit for a landfill or category A mining waste facility hence is not relevant to the Barking Eurohub inert and excavation waste transfer station.

Make sure people understand what you do

25. Awareness of the site management system and the aspects relevant to the specific roles is a key aspect of the staff training. DB Cargo consult with relevant site personnel on various aspects including:

- Completing or reviewing risk assessments and safe working procedures;
- Investigating accidents, incidents or near misses;
- Introducing or changing procedures, or any safety procedure, or control measure;
- Introducing any new plant or equipment;
- Team briefings.