Environmental Management System

Prepared on Behalf of:

X-Bert Haulage Limited

Site Name:

250 Progress Way

Toddington Road

Luton

Bedfordshire

LU4 9DZ

Environmental Permits:
KB3703TS

DOCUMENT CONTROL SHEET

Client:	**X-Bert Haulage Limited**
Project:	**Bespoke Permit Consolidations & Variation Application**
Title:	**Environmental Management System**
Issue:	**1.3**
Date:	**12.12.24**
Status:	**Submission Version**

Key Site Information

SITE DETAILS			
X-Bert Haulage Limited Progress Way, 250 Toddington Road, Luton, Bedfordshire, LU4 9DZ			
SITE CONTACTS	**Name**	**Office Hours**	**Out of hours**
TCM	Bobby Wallace	01582 571200	01582 571200
Emergency Contact	Bert Glynn	07710 797627	07710 797627
EMERGENCY SERVICES		Office Hours	Out of hours
Police, Fire Ambulance:		999	999
REGULATORS		Office Hours	Out of hours
Environment Agency (emergency hotline)		0800 80 70 60	0800 80 70 60
OTHER KEY CONTACTS	Name	Office Hours	Out of hours
Specialist Compliance Advisor:	Shane Tasker	079199 05206	079199 05206

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1 Introduction

1.1.1 This Environmental Management System has been produced in accordance with Environment Agency Guidance 'Develop a management system: environmental permits'.

Table 1: Develop a Management System & Environmental Management System Cross Reference

Develop a Management System Guidance Contents	Environmental Management System Sections
Site Infrastructure	Section 1.7
Site Operations	Sections 3-10
Site Equipment Maintenance Plan	Section 14
Contingency Plan	Section 15
Accident Prevention & Management Plan	Sections 16-22
Climate Change	Appendix EMS7
Complaints Procedure	Section 19
Managing Staff Competence & Training Records	Sections 1.5 & 13
Keeping Records	Section 10
Review Your Management System	Section 23
Site Closure	Section 15

1.2 Interpretation

1.2.1 'Member of the Management Team' means any person trained and responsible for monitoring and reporting as detailed in this EMS. This may be the responsible Director, Technically Competent Manager, the Site Management (if not the TCM and the Site Supervisor. It excludes general site staff unless they have specific training and responsibilities.

1.3 General Management

1.3.1 Activities will be operated and managed in accordance with this site-specific Environmental Management System (EMS) and the governing Environmental Permit, using sufficient competent persons and resources

1.3.2 All employees having duties that are or may be affected by the matters set out in this EMS will have access to a copy of this document and the governing permit. Documentation will be clearly labelled and displayed within the Site Office.

1.4 Implementation and Operation

1.4.1 Sufficient resources essential to the effective implementation and update of this EMS will be put in place and maintained. At least one Member of the Management Team is present when the site is operational.

1.4.2 Training needs have been identified so that all personnel whose work may contribute towards the safe and compliant operation of the site have received appropriate training.

1.5 Sufficient Competent Management

1.5.1 Sufficient competent management will be maintained and the minimum TCM attendance requirements will be met. Attendance will be recorded in the Site Diary.

1.5.2 In the event that the designated TCM is absent for a period of time such that the minimum agreed attendance is unlikely to be achieved, a suitably qualified alternative will be secured.

1.6 Checking & Corrective Action

1.6.1 A Member of the Management Team will be responsible for handling and investigating any incidents that may result in non-compliance with this EMS, taking action to mitigate any impacts caused and for initiating and completing corrective and preventive action. Any such action will be used to inform changes in the documented procedures.

1.7 Site Infrastructure

Table 2: Site Infrastructure Provisions

Provisions	Description
Drainage	Areas benefitting from an impermeable surface and all surface water run off is captured via the drainage system.
Site Perimeter	Enclosed site perimeter, with access via entrance gate.

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2 Environmental Legal Register

Table 3: Environmental Legal Register (Not an exhaustive list of requirements)

Legislation	Summary/Obligations	Compliance Documentation Location	Responsible
Environmental Permit	Overarching permit that stipulates the conditions by which the site must be operated to.	Copy of permit held within Office. Compliance documentation includes an Environmental Management System	Member of the Management Team
Waste Carriers Licence	Waste management companies moving wastes must be registered as an 'upper tier' waste carrier.	Copy of contractors' registrations held within the Office.	Member of the Management Team
Environmental Permitting Regulations 2016 (As Amended)	Overarching legislation for waste management facilities (i.e. requirement to have an permit & to comply with conditions).	Copy of permit held within the Office.	Member of the Management Team
The Waste (England and Wales) Regulations 2011 Waste Hierarchy (As Amended)	Overarching legislation for the management and handling of waste. Ensure waste is managed as far up the waste hierarchy as possible, evidence should be retained within the Company Office to support any minor deviations.	Compliance with the waste hierarchy is assured by the procedures detailed within this Environmental Management System & Duty of Care documentation.	Member of the Management Team
The Environmental Protection Act 1990: Copies of all non-hazardous waste Duty of Care waste transfer notes must be kept onsite for 2 years.	Overarching legislation for waste management activities. Duty of Care requirement for the movement of all waste, (not required for internal movements or movements within the same company). These must be kept for two years.	All Duty of Care waste transfer notes are held in Office for two years.	Member of the Management Team

The Hazardous Waste Regulations 2005: *Hazardous Waste Consignment Notes (Recommendation that the EA template for Consignment Notes is used)*	Overarching legislation for wastes that are classified as hazardous. Hazardous waste must not be mixed with other hazardous waste or non-hazardous wastes. A Consignment Note must accompany all hazardous waste movements; these must be kept onsite for 3 years.	All Consignment Notes are kept for three years within the Office	Member of the Management Team
Landfill Tax Assessment (LOI Test)	Overarching legislation regarding the tax associated with disposing of wastes at landfill (cheaper tax for those materials that can be considered inert).	All ignition test results & audit trail documentation held in the Office (abnormal generation).	Member of the Management Team

3 Operations

3.1 Specified Waste Management Operations

3.1.1 Waste management operations authorised within the permitted area are listed in Table 4 below.

Table 4: Specified Waste Management Operations (TBC)

3.2 Permitted Wastes

3.2.1 Primary waste types that will be received onsite are presented in Table 6 below.

Table 5: Permitted Waste Types (TBC)

3.3 Waste Throughput

Table 6: Maximum Permitted Throughput (TBC)

4 Wood Waste Flow Diagram

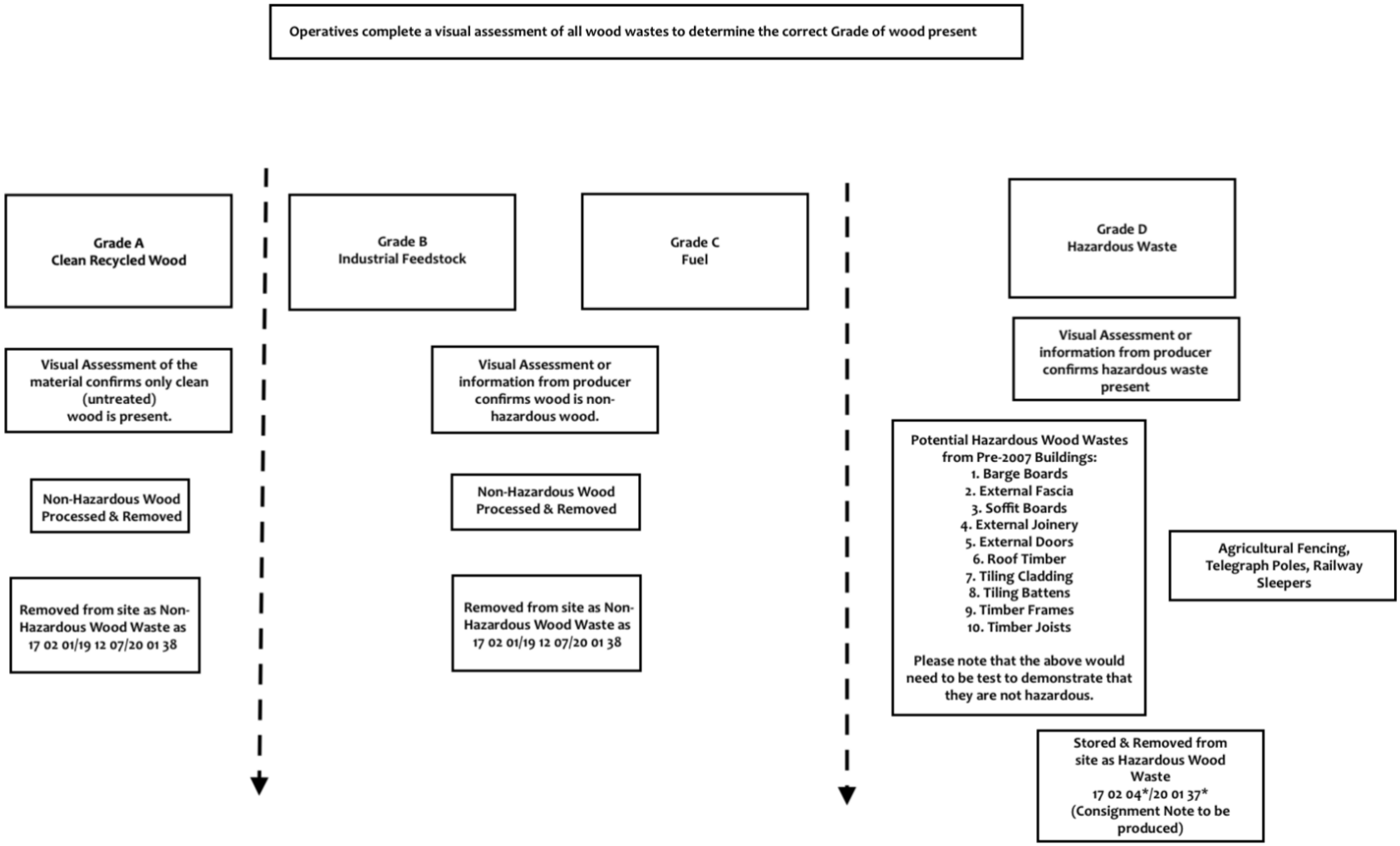


Figure 1: Waste Wood Flow Diagram

5 Potentially Hazardous Demolition Waste Wood (Illustrations)

<u>Figure 2:</u> Pictures of Potentially Hazardous Wood Wastes (Pre-2007) WRA

6 Grades of Waste Wood (WRA)

Wood Recyclers' Association

WRA Grades of Waste Wood

GRADE	Typical Markets	Typical Sources of raw material for recycling and/or recovery	Typical Materials	Typical non-wood content prior to processing	Notes
Grade A **Pre-Consumer Waste Wood (*1) and untreated wooden packaging = Clean un-treated**	A feedstock for the manufacture of professional and consumer products such as animal bedding, equine and landscaping surfacing. May also be used as a fuel in domestic and non-IED Chapter IV biomass installations and for the manufacture of pellets and briquettes.	Wood Product Manufacturing, Distribution, Retailing, Packaging and Secondary manufacture, e.g. joinery and pallet reclamation.	Solid softwood and hardwood. Packaging waste, scrap pallets, packing cases and cable drums. Process off-cuts from the manufacture of virgin/sawn timber and untreated board products.	Nails and metal fixings. Minor amounts of non-hazardous surface coatings, such as water-soluble paint.	This is a waste as defined by the waste regulations. Does not require an IED Chapter IV installation and should not contain any treated or low-grade material.
Grade B **Business waste wood = Treated Non-hazardous**	This is the preferred feedstock for industrial wood processing operations such as the manufacture of panel board products. Can also be used for IED Chapter IV biomass.	As Grade A, plus construction and demolition operations, skip operators, transfer stations.	May contain Grade A material as above plus building and demolition materials and domestic furniture made from solid wood.	Nails and metal fixings. Some paints, plastics, glass, grit, non-hazardous coatings, binders and glues. Limits on treated or coated materials as defined by end users and IED.	This is mostly solid wood. Some feedstock specifications contain a 5% to 10% limit on former panel products such as chipboard, MDF and plywood. Is a waste for the requirements of Waste Management Regulations. Will require an IED Chapter IV compliant installation for biomass. Any of the items listed in the WRA Waste Wood Assessment Guidance as 'Potentially Hazardous' (*2) must be segregated and tested to prove that they are non-hazardous. Otherwise they must be categorised as Grade D – Hazardous.
Grade C **Municipal waste wood = Treated Non-hazardous**	For use in the IED Chapter IV biomass installations and for panel board in controlled volumes.	All above plus municipal collections, transfer stations and HWRCs.	All of the above plus flat pack furniture made from board products and DIY materials.	Nails and metal fixings. Paints, coatings and glues, paper, plastics and rubber, glass, grit. Coated and treated timber (non CCA or creosote).	This is mostly board products. Mainly suitable for IED Chapter IV compliant biomass installations, but also suitable for panel board manufacture with correct processing and blending. Is a waste for Waste Management Regulations.
Grade D **Hazardous waste wood = Treated hazardous**	Requires disposal at facilities licensed to accept hazardous waste.	Waste wood from hydraulic engineering, such as wood from docks. Waste wood from industrial applications such as cooling tower timbers, woodblock flooring or moulds Waste wood from boats, carriages and trailer beds Waste wood treated with CCA or creosote Any of the items listed in the WRA Waste Wood Assessment Guidance as 'Potentially Hazardous' (*2) must be segregated and tested to prove that they are non-hazardous. Otherwise they must be categorised as Grade D – Hazardous	Agricultural fencing, telegraph poles, railway sleepers. 2 Potentially hazardous waste wood items are: barge boards; external fascias; soffit boards; external joinery (wooden windows and conservatories); external doors; roof timbers; tiling and cladding battens; timber frames and joists from pre-2007 buildings	Copper chrome arsenic (CCA) preservation treatments and creosote.	These materials must be segregated and consigned as hazardous to sites permitted to accept hazardous wood.

Figure 3: Grades of Wood Waste (WRA)

7 Operational Flow Diagrams

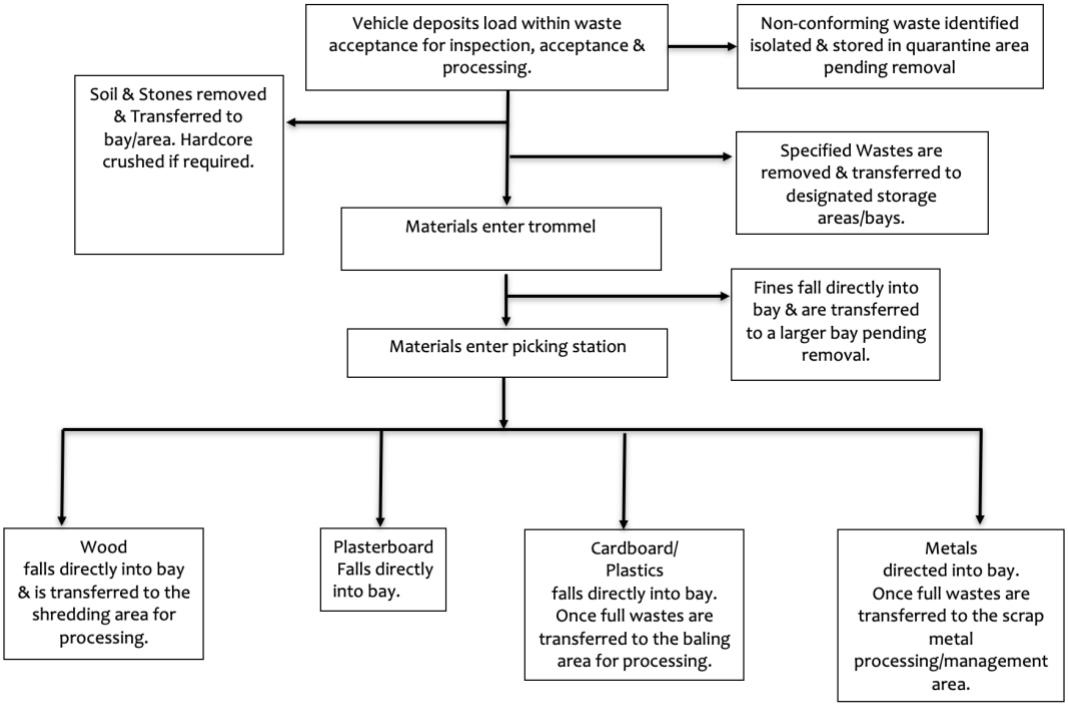


Figure 4: Operational Flow Diagram (Physical Treatment)

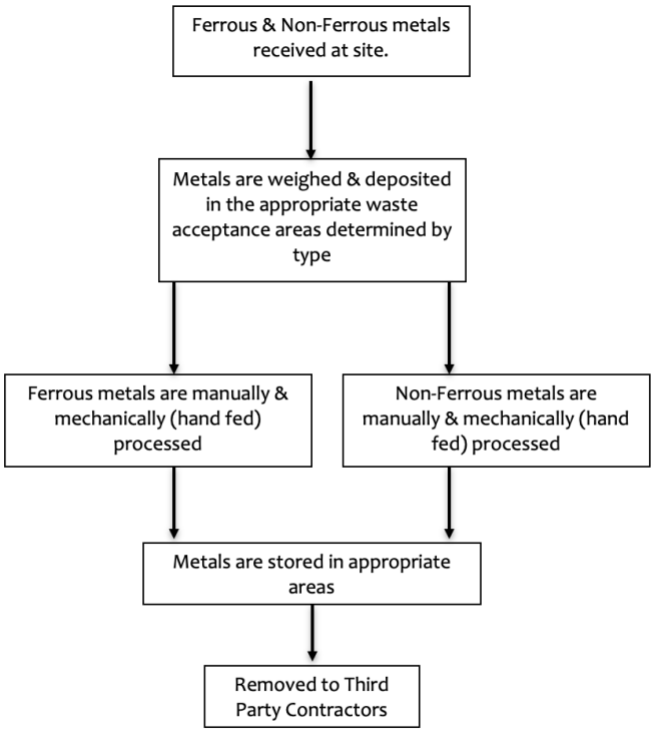


Figure 5: Operational Flow Diagram (Metals)

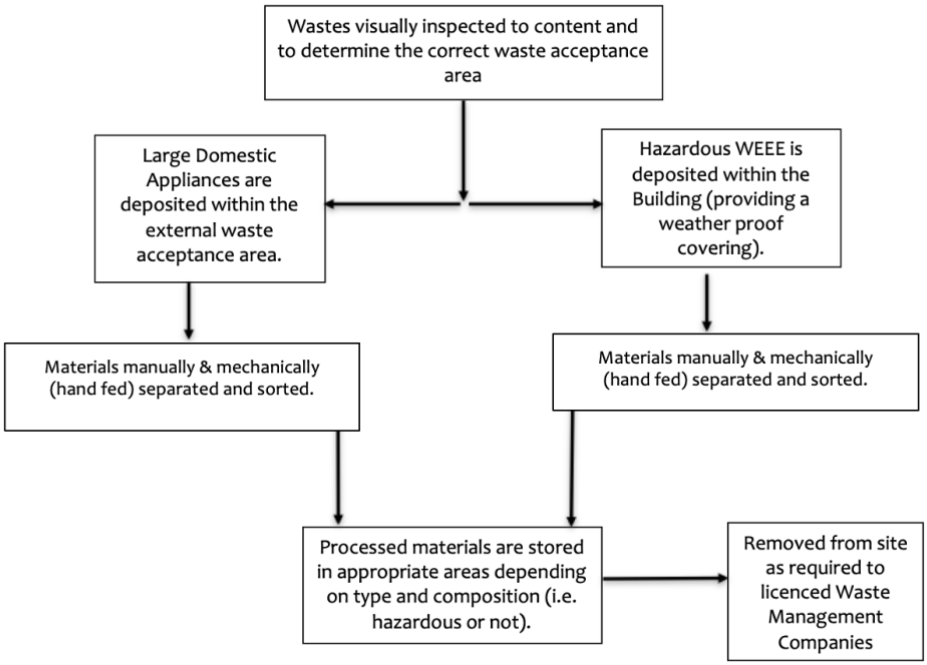


Figure 6: Operational Flow Diagram (WEEE)

8 Waste Acceptance Procedures

8.1.1 Compliance with the permitted waste types is assured by the following measures:

1. When a skip/container is hired prohibited material is clearly stated and reflected in terms & conditions of hire;
2. When collecting the full skip/container the driver will inspect and check to see if any prohibited material is present. If it is, the customer will be notified and advised of the following course of action available:
   a) Removed and left at the customers premises
   b) Accepted and disposed of directly to a site permitted to accept the waste
3. On delivery to site the driver will hand all paper copies of any Duty of Care Documentation to the Site Office, whilst all electronic paperwork will be transferred to the Site Office during transportation; and
4. Once all Duty of Care Documentation has been approved the wastes will be deposited in the Waste Acceptance Area for inspection, acceptance & processing (machine operatives will spread out the loads to aid the visual inspection process).

8.1.2 If any prohibited materials are present the following course of action will be taken:

a) Require the individual to load the non-permitted materials back onto the delivery vehicle; or
b) Accept, isolate & arrange for removal to an authorised waste management facility.
c) Under no circumstances will non-permitted wastes be retained onsite and dealt with as if it is permitted.
d) The Agency will be notified if a delivery is rejected.

8.1.3 If the prohibited material becomes apparent only after the above waste acceptance checks have been completed the following action will be taken:

a) The load will be isolated within the isolation facility (appropriate PPE will be warn if necessary) and removed from site to a suitably permitted facility at the earliest opportunity.
b) In each case, the incident will be recorded in the Site Diary (taking note of the vehicle registration, date & time of the incident). If identifiable the individual will be notified of the event and reminded of the terms on which

waste is accepted onto site. (It will be at the discretion of the Management Team if they wish to ban an individual/company following an incident).

c) Under no circumstances will prohibited waste be retained onsite and dealt with as if it is permitted.

d) The Agency will be notified if a delivery is rejected.

8.2 Rejection Procedure

8.2.1 Any wastes identified as being unsuitable for disposal at the site will be rejected & recorded in the Site Diary.

8.2.2 A record will be kept of the following pieces of information:

a) Date & time

b) Person rejecting the waste(s)

c) Haulier/customer name and address including carriers number

d) Vehicle registration number

e) Procedure name and address

f) EWC number

g) Transfer Note Number

h) Waste Description

8.3 Ferrous Metal Acceptance Procedures

1. Ferrous metal deliveries are directed to deposit their loads within the Ferrous Metal Waste Acceptance Area.
2. Operatives inspect materials during the unloading process & once deposited within the Acceptance Area.
3. In the event of non-permitted wastes or unsuitable materials being detected during the inspection process the following procedures will be followed: -
   a) If visual inspection of waste prior to tipping identifies unsuitable wastes or items, the vehicle will not be allowed to unload.
   b) If once tipped unsuitable waste or item(s) are identified, the waste/item(s) will be relocated and if necessary isolated within the non-permitted waste isolation facility (a skip/container).
   c) Any pressurised canisters detected will be isolated, removed and stored within the Pressurised Canister (lockable) Cage.
   d) Details of all such incidents will be recorded in the Site Diary. In each case a record of the incident will be noted including time, description, and carrier. (Customers will be contacted & made aware of permitted waste types if any non-permitted waste types are identified).
4. Once the Operative has accepted the materials the delivery vehicle will be directed back to the weighbridge, for weighing and finalisation of documentation.
5. Operatives will continue to inspect all materials deposited whilst processing operations are undertaken as necessary.
6. All materials will be inspected prior to stockpiling to ensure no non-permitted wastes are present. In the event of identification these materials will be relocated, (if necessary), isolated and stored within the non-permitted isolation facility (a skip/container).

8.4 Non-Ferrous Metal Waste Acceptance Procedure

1. Non-Ferrous metal deliveries are directed to deposit their loads within the Non-Ferrous Metal Waste Acceptance Area.
2. Operatives will inspect all materials deposited within the Non-Ferrous Metal Acceptance Area to ensure that no non-permitted wastes or unsuitable materials are present.
3. Non-Ferrous Metals are individually weighed by type & grade allowing a detailed examination of all wastes present. (Includes batteries & cables for example).
4. In the event of non-permitted wastes or unsuitable items being detected the following procedures will be followed: -
    a) If visual inspection of waste prior to tipping identifies unsuitable wastes the vehicle will not be allowed to unload.
    b) If once tipped unsuitable waste is identified, the waste/item(s) will be relocated and if necessary isolated within the non-permitted waste isolation facility (a skip/container).
    c) Details of all such incidents will be recorded in the Site Diary. In each case a record of the incident will be noted including time, description, and carrier.
5. Waste materials accepted will be stored in receptacles as specified on the Site Layout Plan.
6. Operatives will inspect all materials accepted to ensure that no non-permitted wastes or unsuitable materials have been inadvertently accepted or stored. In this eventuality, these materials will be removed and if necessary isolated within the non-permitted waste isolation facility (a skip/container).

8.5 Fibrous Asbestos Procedure

8.5.1 If asbestos is detected the following procedures will be followed:

I. Isolate, if safe to do so while using appropriate PPE.

II. Dampen down utilising water provisions to prevent fibres/particulates being released.

III. Contact a specialist contractor to isolate/remove asbestos from site immediately.

IV. In the event of fibre release, the site will be evacuated until a specialist contractor has dealt with the risk. The Environment Agency and the Environmental Health Officer will be notified immediately.

V. Notify Regulatory Authorities when the asbestos has been removed offsite and the site has recommenced operations.

VI. Complete a Non-Conformance Record Form and an Accident & Incident Investigation Report.

VII. Provide written confirmation of the event and outcome to the Agency within 24 hours, completing from in Appendix EMS4.

VIII. Details of all such incidents will be recorded in the Site Diary and records of removals are kept within the site office. In each case a record of the incident will be noted including time, description and carrier.

9 WEEE Wastes

9.1.1 WEEE wastes will be managed both manually and mechanically (hand fed equipment), which will enable non-hazardous WEEE wastes to be stored externally and all hazardous WEEE wastes will be stored undercover to ensure water does not come into contact with potentially hazardous components.

10 Storage Procedures

10.1.1 Wastes are stored within designated bays/containers/areas until sufficient quantities have accumulated to represent a load requiring removal; removals are undertaken on an ongoing basis.

11 Despatch Procedures

1. Wastes stored within bays/containers/areas will be placed within the despatch vehicle using mechanical equipment.
2. Containers will be loaded directly onto the collection vehicle.
3. Once loaded the vehicle sheeted for despatch and weighed.
4. All drivers will inspect their loads prior to leaving the site to prevent spillages of waste or debris on the entrance and exit roads of the site.

12 Duty of Care

12.1.1 X-Bert Haulage Limited takes its responsibilities seriously under Duty of Care & understands them to require it to:

1. Check the authorised status of all waste carriers utilised;
2. Wastes are going to a suitably authorised facility;
3. Complete compliance status checks from time to time;
4. Produce & maintain appropriate records relating to wastes received and removed.

12.2 Reporting

12.2.1 Within one month of the end of each quarter, all information relating to wastes accepted & removed from the site must be submitted to the Environment Agency for the previous quarter.

12.3 Notification

12.3.1 Notify the Environment Agency without delay in the event of detecting any of the following:

1. Any malfunction, breakdown or failure of equipment or techniques, accident or emission of a substance not controlled by an emissions limit which has caused, is causing or may cause significant pollution;
2. The breach of a limit specified in the permit;
3. Any significant adverse environmental effects.

12.3.2 The Environment Agency will be notified without delay with written confirmation (i.e. an email & telephone conversation with the local Enforcement Officer) of such incidents, which must be submitted within 24 hours.

12.3.3 The Environment Agency will be notified at least one month prior to any changes in the actual conduct of the operation from those proposed in the Environmental Management System.

12.3.4 The Environment Agency will be notified within 14 days of the occurrence of the following matters except where such disclosure is prohibited by Stock Exchange Rules.

Where the operator is a registered company:

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

12.4 Avoidance, recovery and disposal of wastes produced by the activities

12.4.1 The requirements laid down by The Waste Regulations 2011 will be complied with as far as possible and in particular: -

a) Waste managed by the activities; and

b) All waste generated by operations conducted onsite will be dealt with in accordance with the waste hierarchy; and

c) If disposal is necessary, a manner will be selected which reduces the potential impact on the environment

12.4.2 All wastes generated will be quantified & characterised using appropriate competence.

12.4.3 Any hierarchy deviations will be justified and recorded.

12.4.4 Every three years all arrangements & practices around the management of wastes will be reviewed. Steps identified by such a review will be implemented as necessary & deemed appropriate to operational compliance.

12.5 Site Security

12.5.1 Security arrangements include an enclosed site perimeter with a main access gate. Outside operational hours the site access gates are shut and securely locked.

12.5.2 Security arrangements are inspected on a weekly basis. Any necessary repairs are recorded in the Site Diary & will be completed as soon as possible to maintain the sites perimeter, which may result in interim repairs until an external contractor can attend site.

12.5.3 The Management Team constantly evaluates all onsite security arrangements.

13 Training

13.1.1 New employees' will receive an induction upon commencement of employment, which will involve a Member of the Management Team completing a training needs assessment to ensure all new employees have the required training to complete their day-to-day tasks correctly & safely.

13.1.2 Training is tailored depending on an employee's specific needs/ role within the Company; these needs are presented within the Table 9 below.

13.1.3 Training records are held within the Office.

13.1.4 Employees' receive refreshers trainings on all internally provided training as required.

13.1.5 External companies provide specialist training to onsite employees as and when it is required with appropriate refreshers as determined by the external trainers.

Table 7: Training Matrix (Training Needs Assessment Example not an exhaustive list)

Training Requirements		Management Team	Admin Staff	Operatives	External Contractors
Internal Training ('Tool Box Talks')	Environmental Management System Procedures				
	Emissions Management Procedures				
Externally Completed Training	Mechanical Equipment				
	First Aider				
	Fire Marshall				
	Fire Awareness				

Key	
Required	
Not Required	

14 Maintenance

14.1 Daily Checks

14.1.1 Operatives will inspect all mechanical equipment on a daily basis prior to the commencement of operations.

14.1.2 Defects are raised with a Member of the Management Team & recorded as appropriate.

14.1.3 If repairs cannot be completed onsite an appropriate external contractor (dependent on the type of malfunction) will be contacted to affect a repair.

14.2 Weekly Checks

14.2.1 A Member of the Management Team will undertake a thorough inspection of all critical site infrastructure & equipment on a weekly basis.

14.2.2 Repairs will be recorded in the Site Diary where appropriate. If a repair cannot be completed onsite then the faulty item will be isolated and arrangements made for repairs to be effected as soon as practicable.

14.3 Annual Checks

14.3.1 Mechanical equipment as defined under the LOLER Regulations will have CTE inspections completed on a yearly basis & all equipment will undergo the manufacturers' or suppliers' recommended frequency for servicing.

14.3.2 Routine mechanical maintenance is scheduled against the records kept in the Office. These records determine the frequency by which inspections take place.

14.3.3 All records will be kept in the Office.

14.4 Maintenance Checklist

Table 8: Maintenance Checklist (Recommendations)

Maintenance	Frequency					Location of Instructions
	Day	Week	Month	Year	5 years	
Internal						
Clean up Spills on Surfaced Areas.	O					Office
Inspect Integrity Of Site Security Perimeter	O					Office
Inspect Integrity & State Of Site Surfaces/Access Road	O					Office
Clean Site Surfaces To Prevent 'Track-Out'.	O					Office
Inspect Storage Areas/Bays/Containers	O		M			Office
Inspect Electrical Equipment		M				Office
Inspect Fire Fighting Equipment			M			Office
Inspect Mechanical Equipment	O	M				Office
External						
Operational Fleet (Servicing/Mot)				E		Office
Mechanical Equipment (Loler)				E		Office
Fire Extinguishers				E		Office
Electrical Wiring					E	Office

Key	
Management Team	M
Operative	O
External Contractor	E

15 Contingency Planning

Table 9: Contingency Measures

Eventuality	Procedures/Measures
Accident	Measures may include: - 1. The affected area will be isolated and an appointed 'first aider' will be contacted to attend to any injured party. 2. If necessary the emergency services will be contacted. 3. A Member of the Management Team will decide on a case-by-case basis if cessation of operations around the affected area and reception of waste is necessary until the appropriate emergency services have arrived. 4. A Member of the Management Team will complete an Accident Investigation Report (RIDDOR).
Seasonality (Including Transportation Shortages)	Measures could include: - 1. Confirm current storage times for materials accumulated onsite. 2. Contact outlets for the specified stream and arrange transportation. 3. Transport all waste accumulated within a designated container, even if it may be economically undesirable to do so, i.e. the container for transportation is not full.
Supply Chain Failure (Including Transportation Shortages)	Measures could include: - 1. Confirm current storage times for materials accumulated onsite. 2. Increase monitoring of material stockpiles onsite. 3. Contact outlets for the specified stream and arrange transportation. 4. If the outlet is not receiving the specified waste stream contact other outlets. 5. Conduct investigations into potential alternative outlets, if potential outlets are not accepting specified streams. 6. Seek advice from EA.
Breakdowns (Mechanical Equipment)	Measures could include: - 1. Immediate isolation of the affected machinery. 2. External repair/servicing contractors are instructed to effect repair. 3. Mechanical equipment on the adjacent site will be deployed in interim if available & deemed necessary. 4. Hire in relief equipment in interim if needed. 5. Suspend the acceptance of wastes that require handling by mechanical equipment & notify the EA. 6. Reschedule material despatched to align with scheduled repairs and or relief machinery availability.
Enforced Shut Down & Site Closure	Measures could include: - 1. Appropriate signage will be erected notifying any visitors that operations have been suspended. 2. Advise customers of the situation. 3. No more wastes will be accepted on to site. 4. Contact all potential outlets to ensure that all waste material is managed in accordance with the waste hierarchy where possible. 5. Notify EA that customers & receiving outlets have been contacted and provide scheduled dates for material removal. 6. Notify EA once stockpiles have been reduced to acceptable level

16 Emissions Management

16.1 Monitoring

16.1.1 Employees will remain mindful of the potential impact the operation could have on the local environment and take all reasonable steps to avoid giving rise to pollution or a nuisance as a consequence of the site operations.

16.1.2 In the event of on going issues or concerns being identified these will be investigated and appropriate actions implemented. This may include the formulation of management plans.

16.1.3 In the event of an emissions release that has caused, is causing or may cause significant pollution, the Environment Agency will be notified within 24 hours (complete form in Appendix EMS4), advice taken and action recorded.

16.2 Dust Emissions

16.2.1 See separate Dust Emissions Management Plan.

16.3 Odour Emissions

16.3.1 It is not expected that odour generation/release will present any significant problems due to the non-putrescible nature of wastes dealt with onsite.

16.4 Odour Monitoring

16.4.1 Operatives & Member of the Management Teams will monitor odour levels on an ongoing basis throughout the working day. Observations will be recorded in the Site Diary.

16.5 Odour Management Procedures

1. Dampen down malodorous materials.
2. Isolate malodorous materials in a secure (preferably lockable) container/skip to minimise potential odour escape.
3. Arrange for the removal of isolated materials as soon as practicably possible.
4. Complete an Odour Assessment Form (see Appendix EMS7) & an Environmental Incident Record Form (see Appendix EMS1).
5. Send copy of the completed form (Appendix EMS4) to the Environment Agency within 24 hours.
6. Ongoing monitoring of isolation area (via odour assessments) until the source has been removed from site.
7. Record all monitoring & any action taken in the Site Diary

8.

16.6 Noise

16.6.1 The overall noise emissions amenity impact is considered to be low, due to the nature of adjacent operations & onsite controls/procedures.

16.7 Noise Control

16.7.1 The procedure for deploying the Noise & Vibration suppression system is as follows:

Proactive

1. **Check site conditions for Noise & Vibration potential risks;**
2. Remedial measures put in place to minimise if not eliminate the source; and
3. Be prepared to suspend operations giving rise to excessive Noise & Vibration.

Reactive

1. **In the event of Noise & Vibration emissions being amber or red (as detailed within Table 12) enact the following procedures;**
2. Remedial measures put in place to minimise if not eliminate the source;
3. Cease all onsite activities (if emissions escaping the site boundary) until conditions improve;
4. Once Noise & Vibration levels reduce, record the incident on an Environmental Incident Report (Appendix EMS1), the file for which is located within the site office; and
5. Report incident to the Management or Supervisor for further investigation.

Table 10: Noise & Vibration Management Action Levels

Action Level	Operation Conditions	Onsite Procedures
	Normal Operating Conditions	No mitigation required, but ongoing monitoring by all staff members. Daily inspections undertaken by a member of the site management team
	Noise & Vibration emissions arising from within the operation	Ongoing monitoring by all staff members. Daily inspections undertaken by a member of the site management team
	Noise & Vibration emissions escaping the site boundary.	Remedial measures put in place to minimise if not eliminate the source. Cease operations giving rise to Noise & Vibration emissions if deemed necessary by Management. Complete an Environmental Incident Report (Appendix EMS1).

16.8 Noise Monitoring

16.8.1 Operatives and a Member of the Management Team will monitor noise levels on an ongoing basis throughout the working day. Observations will be recorded in the Site Diary.

16.9 Scavenging Birds

16.9.1 It is not expected that scavenging birds will present any significant problems as the site will not be accepting any putrescible or food wastes.

16.9.2 Operatives & Members of the Management Teams will monitor conditions on an ongoing basis throughout the working day. Observations will be recorded in the Site Diary.

16.10 Pests

16.10.1 The risk of infestation of pests and vermin is minimised by maintaining general good housekeeping and ensuring that the site is clean and tidy.

16.10.2 Operatives & Member of the Management Teams will monitor site conditions of any signs of pest infestation.

16.10.3 In the event that flies, or other such problematic insects are introduced to the site with incoming waste, insecticides offering rapid and long-term treatment will be utilised and the offending waste promptly removed from site.

16.11 Litter

16.11.1 The overall impact is consider low due to onsite control measures including netting & palisade fencing deployed along the perimeter of the site.

16.11.2 Operatives conduct litter inspections on a daily basis.

16.11.3 Any escape of litter will be controlled throughout the working day & cleared immediately on identification

16.11.4 Operatives complete a final inspection around the site perimeter at the end of the working day and removal of any fugitive material/debris, access road and operational areas at the end of the working day.

16.12 Mud & Debris Management Procedures

1. Operatives conduct regular inspections throughout the working day.
2. Debris/mud created by waste material stockpiles is to be returned to the pile.
3. On identification the area will be cleared: -
    a. Reaction time: Public highway immediately i.e. within 1 hour of detection and within the permitted boundary as soon as practicably possible by the end of the working day.
4. All vehicles leaving the site to be sheeted to prevent any material/debris falling out during transportation.

18 Emergency Procedures

18.1.1 The following procedure applies to **All Emergencies**:

1. A Member of the Management Team will take immediate control of any incident pending handover to the appropriate authority (if currently onsite).
2. Gather as much information as possible, including names & addresses of any bystanders & take photos as evidence if possible.
3. Appropriate personal protective equipment is to be used at all times (PPE is located within the Company Office).
4. Complete an Environmental Incident Record form as shown in Appendix EMS1.

18.2 Environmental Incident Record Form Procedure

1. Complete Environmental Incident Record Form as detailed within Appendix EMS1 in the event of any accident/incident with potential environmental implications.
2. Pass completed form to a Member of the Management Team for investigation.
3. Once investigations are complete any corrective action recommended.
4. A copy of any completed forms is held within the Office once actioned for at least three years.

19 Complaints

19.1.1 In order that any complaints can be substantiated it is imperative that the site is immediately informed either by the complainant themselves or by the Environment Agency or Local Authority.

19.1.2 The site telephone number is clearly displayed at the site entrance and local residents are encouraged to immediately contact the site in the event of any off-site issues that might be attributable to site operations being detected.

19.2 Complaints Investigation Procedure

1. Complete a Complaints Record Form (only trained operatives authorised).
2. Once completed, the form must be passed onto the Company Director.
3. An investigation in undertaken by the Company Director to determine presence/absence, characteristic and intensity of issue. The time of the complaint will be linked with site activities. Review the Site Diary to determine if any abnormal site operations/conditions were at the time of the complaint.
4. The Company Director will determine the appropriate action necessary to remedy/mitigate the causes of the identified complaint.
5. Specialist advice will be sort if deemed necessary.
6. Complete an Environment Incident Record Form (Appendix EMS1) if deemed necessary.
7. Any actions taken will be recorded
8. Send copy of the completed form (Appendix EMS4) to the Environment Agency Permitting Officer within 24 hours of detection.
9. All complaint forms will be available for inspection by representatives of regulatory bodies.

19.2.1 All complaint forms will be available for inspection by representatives of regulatory bodies.

20 Leakages or Spillages Procedure

20.1.1 On identification of a **Leak or Spillage** the following procedure is to be followed to:

1. Prevent unauthorised access to the affected area
2. Prevent uncontrolled escape of potentially contaminating liquids using supply of absorbent materials to control the flow of liquids.
3. If safe to do so, isolate source of leak/spillage to prevent further losses, which may involve switching off a particular piece of machinery & deploying a containment vessel (i.e. drip trays) underneath the affected area.
4. If necessary initiate controlled evacuation of the site.
5. If the leak/spillage is battery acid, apply a neutralising agent hydrated lime or similar (please note that water in a large quantity will only dilute the acidity & will not neutralise it) on the affected areas (Operatives must use appropriate PPE; gloves, face masks & goggles, whilst handling hydrated limes).
6. All contaminated absorbents, must be placed in a leak proof container, which is labelled & stored pending removal.
7. Seek specialist advice on decontamination of the site surfaces if necessary
8. Complete an Environmental Incident Record Form (See Appendix EMS1)
9. Any actions taken will be recorded in the Site Diary
10. Send copy of the completed form (Appendix EMS4) to the Environment Agency Permitting Officer within 24 hours of detection.
11. Confirm site clean up with the Environment Agency.
12. Replenish supplies of absorbent materials.

21 Equipment & Machinery Malfunction & Failure Procedure

21.1.1 On identification of any **Equipment or Machinery Malfunctions or Failures** the following procedure is to be followed to:

1. Cease operations immediately & determine if continuation of use poses a significant risk to health or the environment.
2. If continuation poses a significant risk, switch the piece of equipment off & isolate the affected equipment.
3. Notify a Member of the Management Team who will instruct the appropriate maintenance personnel or external contractor to undertake necessary repairs.
4. Notify Environment Agency Permitting Officer if the malfunction or failure could cause pollutants to escape the permitted boundary.
5. Complete an Environmental Incident Record Form. (See Appendix EMS1)
6. Any actions taken will be recorded in the Site Diary.
7. Send copy of the completed form (Appendix EMS4) to the Environment Agency Permitting Officer within 24 hours of detection.

22 Non-Conformance Procedure

1. Non-conformance identified.
2. A Non-Conformance Record form is completed (see Appendix EMS3) and passed to a Member of the Management Team
3. The Member of the Management Team initiates an investigation of the non-conformance & then ascertains potential impacts on the environment and how serious any potential effects could be.
4. Once the non-conformance has been assessed, action will be taken to remedy the cause.
5. All actions will be recorded.
6. In the event of an emissions release that has caused, is causing or may cause significant pollution, the Environment Agency will be notified within 24 hours, advice taken and actions taken will be recorded in the Site Diary.
7. Send copy of the completed form (Appendix EMS4) to the Environment Agency Permitting Officer within 24 hours of detection.

23 Periodic Review

23.1.1 The adequacy of this EMS will be review as necessary as a result of any operational change or in light of any non-conformance.

Appendix EMS1: Environmental Incident Record Form

Date & time of the incident	
What happened, what was it about?	
Was anyone else aware of this – other witnesses? If so who?	
What caused it?	
What have you done to make sure that it does not happen again?	
Was there any **significant pollution** or **environmental damage** to land, water or protected areas – for example: dust, odour or noise pollution outside the site or spillage of polluting liquids onto the ground, or at a site of special scientific interest, or into a drain or a watercourse? (If so, then complete an incident form) Is there a continuing threat? Yes/No	
If there was (or still is), then you must take steps to prevent further damage and notify the Environment Agency on 0800 807 060 and any other relevant regulators ASAP. Have you done so? Yes / No	Who did you phone? At what time did you phone?
You must also write or send an email to confirm this to the local office (see your accident management plan for the address) Have you done so?	Yes/No What date did you contact?
Please print your name, date and sign:	

Appendix EMS2: Complaint Record Form

Who made the complaint? Name:	
Address	
Phone No	
Date and time they made the complaint	
What happened, what was it about?	
Was anyone else aware of this – other neighbours or your staff? If so who?	
Did the complaint relate to your site? If so, what happened? What went wrong?	
What have you done to make sure that it does not happen again?	
Was there any **significant pollution** or **environmental damage** to land, water or protected areas – for example: dust, odour or noise pollution outside the site or spillage of polluting liquids onto the ground, or at a site of special scientific interest, or into a drain or a watercourse? (If so, then complete an incident form)	
If there was, then you must take steps to prevent further damage and notify the Environment Agency on 0800 807 060 and any other relevant regulators ASAP. Have you done so? Yes / No	Who did you phone? At what time did you phone?
You must also write or send an email to confirm this to the local office (see your accident management plan for the address) Have you done so?	Yes/No What date did you contact?
Please print your name, date and sign:	

Appendix EMS3: Non-Conformance Record Form

Date and time non-conformance identified	
What happened, what was it about and what permit condition does it relate to?	
What caused it? i.e. what happened that should not have happened OR what didn't happen that should have?	
What has been done to make sure that it does not happen again?	
Has the site EMS been reviewed in light of the incident and have any changes to operations and procedures been rolled out in response? Include dates.	
Was there any significant pollution – for example: oil entering a surface water drain. If so what?	
If there was then you must notify the Environment Agency on 0800 807060 ASAP. Have you done so?	Yes/No/not applicable Time: Date: EA. Incident number:
Print name, date and sign	

Appendix EMS4: Environment Agency Notification Form

Part A

(a) Notification requirements for 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	
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	
Substance(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 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	
Substance(s) detected	
Concentrations of substances detected	
Date of monitoring/sampling	

Part B-to be submitted as soon as practicable

Any further 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 facility in the preceding 24 months	
Name*	
Post	
Signature	
Date	

*Authorised to sign on behalf of operator

Appendix EMS5: Accident Investigation Report Form

Site Details:

Date of Accident:	Time:
Site of Accident:	Site Manager/Supervisor at Time of Event:

The injured person (If required)

Name of Injured Person:	Date of Birth or Age:
Nature of Injuries:	Part of Body Injured (Tick as Appropriate)
	Hands, Wrists, Finger Feet, Ankles, Toes Legs, Knees, Hip, Thigh Eyes Head, Face, Neck Torso Back, Spine
First Aid Treatment:	
Hospital Treatment & Contact Address/Telephone:	
Follow Up Treatment (If Any)	

Details of Accident (Please Detail Location Onsite):

For Office Use Only:

Time Off Work (Seven Days RIDDOR):	
Recorded in Accident Log Book: Y/N	Accident Log Book Number:
RIDDOR Reportable: Y/N	RIDDOR Report Number:
Further Investigation Required: Y/N Note: Use the accident log number for investigation.	
Distribution: Office/Site File/Client/Other (Please Specify)	

Continuation box for any additional information or information not able to be entered in other boxes:

Print Name:	Date:
Position:	Signature:

Instructions for reporting accidents:

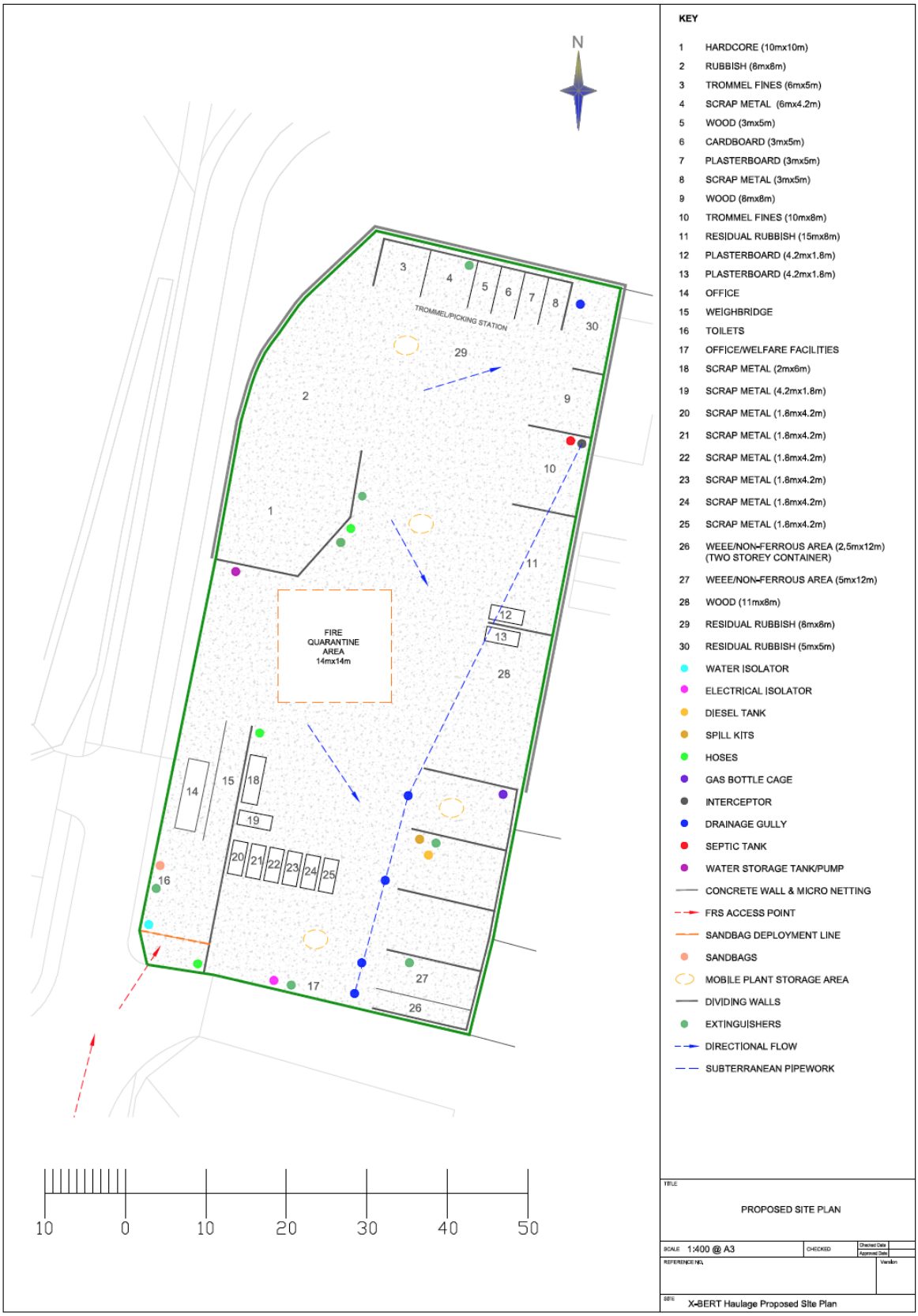
All work in the immediate area with cease and the working area is to be made safe.

In the event of an accident the extent of the injuries will be immediately assessed by the first aider:

1. If the injuries sustained are of minor nature than the first aid provider will apply first aid to the injuries and make appropriate recommendations to the injured person

If the injuries sustained are of a significant or serious nature than the first aid provider will administer as much first aid that they are capable & comfortable to deliver & make the injured person as comfortable person as possible while the emergency services are contacted

Appendix EMS6: Site Layout Plan



Appendix EMS7: Climate Change Risk Assessment

Potential changing climate variable	A Impact	B Likelihood	C Severity	D Risk (B x C)	E Mitigation (What will you do to mitigate this risk)	F Likelihood (After mitigation)	G Severity (After mitigation)	H Residual risk (F x G)
1. Summer daily maximum temperaturemay be around 7°C higher compared toaverage summer temperatures now.	There is the potential for increased temperatures for dust/odour increase from the drying of wastes. However, it is not expected that the activities onsite will give rise to significant dust/odour emissions due to the nature of the wastes handled.	3	2	6	Emissions mitigation measures already addressed within EMS. Materials are removed on an ongoing basis, based on the maximum storage times specified within the Permit are not exceeded. Regular site cleaning and use of water provisions to keep temperatures down. Ensure water supplies are sufficient and potential for consideration around harvesting rainwater in winter months for use in summer. Consideration for the shading of electrical equipment is exposed to direct sun light. Ensure housekeeping arrangements are maintained to a good standard to prevent any vegetation growing around the site and wastes are contained within storage areas. Managing suitable segregation and separation of wastes. Regular inspection and preventative maintenance of the site, plant, or equipment.	3	1	3

2. Winter daily maximum temperature could be 4°C more than the current average, with the potential for more extreme temperatures, both warmer and colder than present.	No negative impact foreseen.	3	2	6	Emissions mitigation measures already addressed within EMS. Materials are removed on an ongoing basis, based on the maximum storage times specified within the Permit are not exceeded	3	1	3
3. The biggest rainfall events are up to 20% more intense than current extremes (peak rainfall intensity)*.	There is potential for an increase in surface water run off that would not cause disruption to operations. The increase in surface water could increase the number of times the interceptor is emptied during wetter periods. Potential for areas benefitting from hardstanding surface to pond if the surface cannot manage the amount of rainfall percolating through.	3	2	6	Increased monitoring of interceptor & drainage system during periods of wetter weather. Weather forecast to be monitored. Ensure drainage arrangements/systems are adequate and sufficient in the event of an increase in rainfall. Drainage systems are inspected and maintained as required.	3	1	3
4. Average winter rainfall may increaseby 36% on today's averages.	There is potential for an increase in surface water run off that would not cause disruption to operations. The increase in surface water could increase the number of times the interceptor is emptied during wetter periods. Potential for areas benefitting from hardstanding surface to pond if the surface cannot manage the amount of rainfall percolating through.	3	2	6	Increased monitoring of interceptor & drainage system during periods of wetter weather. Weather forecast to be monitored. Ensure drainage arrangements/systems are adequate and sufficient in the event of an increase in rainfall. Drainage systems are inspected and maintained as required.	3	1	3
5. Sea level could be as much as 0.6mhigher compared to today's level *.	No negative impact foreseen as the site is located inland.	3	2	6	Increased monitoring of interceptor & drainage system during periods of wetter weather. Weather forecast to be monitored. Ensure drainage arrangements/systems are adequate and sufficient in the event of an increase in rainfall. Drainage systems are inspected and	1	1	1

					maintained as required.			
6. Drier summers, potentially up to 42% less rain than now.	There is the potential for increased temperatures for dust/odour increase from the drying of wastes. However, it is not expected that the activities onsite will give rise to significant dust/odour emissions due to the nature of the wastes handled.	3	2	6	Emissions mitigation measures already addressed within EMS. Materials are removed on an ongoing basis, based on the maximum storage times specified within the Permit are not exceeded. Review Environmental Risk Assessment Documentation. Regular inspection and preventative maintenance of the site, plant, or equipment.	3	1	3
7. At its peak, the flow in watercourses could be 35% more than now, and it could be 75% less than now.	Low flow could potentially impact the mains water used onsite if there was a wider impact on the water supply network.	3	2	6	Increased monitoring of stockpiles & materials are removed on an ongoing basis, based on the maximum storage times specified within the Permit are not exceeded. Main's water supplies only used when necessary.	3	1	3
8. Storms	Storms could see a change in frequency and intensity. The unique combination of increased wind speeds, increased rainfall, and lightning during these events provides the potential for more extreme storm impacts.	3	2	6	Increased monitoring of interceptor & drainage systems during periods of wetter weather and ongoing monitoring of infrastructure to ensure it is secure and suitable. Weather forecast to be monitored. Review structures and any vulnerabilities if weaknesses are highlighted. Regular inspection and preventative maintenance of the site, plant, or equipment.	3	1	3