

KAS Metals Environmental Management System Summary



The KAS Metals Management System consists of policies and procedures which inform the design, construction and management practices that KAS employs to minimize the risk of pollution from permitted activities.

The management system is based on a combination of activity and site specific risk assessment which are used to develop and maintain written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances and complaints.

Directors and senior managers are informed of issues as they arise, this includes weekly reports on all aspects of site management. Directors maintain oversight of the resolution of key environmental matters.

1. Infrastructure Design and Development

The design and development of site infrastructure will follow details and specifications of the permit and those subsequently agreed with the regulator.

Environmental Permit Risk Assessments define site design and management in context of the proposed activity and site-specific setting. These risk assessments will define the control measures required to prevent or minimise the impact of the activity on the environment. This includes but is not limited to protected habitats, groundwater, surface water, air quality and neighbouring residential and business premises.

Management Techniques and facility designs will be submitted in line with permitting requirements. Any change to legal obligations will be communicated to the relevant regulator and addressed as specified in the relevant legal framework.

2. Site Operations

KAS procedures address the management of the site to ensure that they comply with legislative requirements and statutory guidance company standards. These include waste acceptance procedures, environmental monitoring and analysis standards and practices are specified within the management system. As a minimum the monitoring systems ensure compliance with legal requirements is maintained to the best practicable standard and that barriers to compliance are resolved at the earliest opportunity.

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The team is focussed on environmental compliance and ensuring the efficient recycling and re-use of metal wastes. Amenity management procedures will be put in place to ensure minimisation of odour, dust, litter, pests and wider site management protocols are also detailed where appropriate to operations.

3. Site and equipment maintenance plan

The use and the maintenance of equipment are specified by the design or manufacturers' specifications. Preventative maintenance schedules shall be in place to prevent nuisance emissions and set out a frequency relating to infrastructure maintenance. The KAS management system ensures that these requirements are adhered to.

Appropriate use and maintenance is necessary to ensure that the appropriate resources are available to ensure continued environmental compliance. Maintenance and repair records are maintained to demonstrate that the necessary controls are in place.

4. Contingency plans

The management system will be tailored to specified deployments and detail actions to be taken in the event of breakdowns, enforced shutdowns and any other changes in normal operations, for example due to flooding, other extreme weather or fire.

5. Accident prevention and management plan

The KAS accident prevention is the central ethos of the business incorporating the design and development specifications, operational practices, infrastructure and equipment maintenance, environmental monitoring and contingency planning. The management plan will be reviewed quarterly or after an accident, incident or near miss is reported.

Unit emergency plans are provided for each potential incident identifying the actions required and those responsible for completing them. These are maintained on site with relevant site plans and a site specific list of contact details for individuals or organizations that may be required in the event of an incident.

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6. Climate Change

KAS recognise the importance of climate change and procedures are in place ensure fuel usage and emissions are kept to a minimum.

7. Complaints Procedure

A robust complaints procedure is in place at the site that details how complaints are reported, recorded, investigated and managed. Actions taken to remediate any issues arising from complaints are also recorded and monitoring is also in place.

8. Managing staff competence and training records

Technically competent managers ensure compliant management of the site. Employees undergo formal training, employee induction, toolbox talks and emergency procedure desktop & practical exercises. Training records are maintained.

9. Record Keeping

Records required in order to comply with Environment Permits and other legislative requirements are maintained for the requisite duration. Technically competent managers will keep records of environmental monitoring and key documents. These records are available to the regulator at all times.

10. Management System Review

Changes to a site, operations or equipment that affect the activities covered by a permit are addressed and recorded through the document management system as required. This includes when: an element of a permit is varied; after an incident, accident, complaint or relevant breach of a permit or in the event that an improvement is identified.

11. Site Closure

A surrender site condition report will be produced when the site is to close and cease operation. This will be produced in accordance with *Environmental permitting: H5 Site condition report*.

12. Make sure people understand what you do

Staff will have access to the Environmental Management System and receive appropriate training to understand and appropriately manage activities carried out on site.