

## **Environmental Policy Statement**

Rockrush Aggregates Ltd is firmly committed to improving their environmental performance at Matts Hill Farm ME9 7UY and where practicable ensuring the impacts from operations on the environment and nearest neighbours are minimised.

As part of our Environmental Policy, we will:

- Implement, maintain and improve our Environmental Management System;
- Ensure conformance with this Environmental Policy and constantly monitor our environmental performance
- Meet or exceed the requirements of all environmental legislation and other requirements that are relevant to the Company;
- Ensure that employees and sub-contractors act in accordance with our Environmental Policy. The Company will implement a training program for its employees to raise awareness of environmental issues and enlist their support in improving the Company's performance.
- Seek to minimise emissions and reduce waste and prevent pollution arising from our operations, prioritising those areas where we can make most impact.

We will encourage the adoption of similar principles by its suppliers where practical.

## **INTRODUCTION**

This manual represents the formal Environmental Management System (EMS) for Rockrush Aggregates Ltd

The aim of the system is to achieve and demonstrate sound environmental performance by controlling the impacts of the company's activities on the environment consistent with our policy. The EMS supports compliance with the Environmental Permit operated at the site.

### **Company Profile**

Rockrush Aggregates Ltd is a registered haulage and waste treatment company. The business operates from Matts Hill Farm, Matts Hill Lane, Gillingham ME9 7UY. It carries out the crushing and grading of inert waste, soils and aggregate from demolition and local building works.

Site operating hours are as follows:

- Monday to Friday: 08.30 to 17.00;
- Saturday: 08:00 to 13.00; and
- Sunday / Bank Holidays: Closed.

### **Scope of System**

The scope of the environmental management system covers "Crushing and Grading of Inert and Excavation Waste"

The purpose of this manual is to define the EMS, which will ensure that the company activities are conducted in a manner which will minimise adverse environmental impacts and enhance our role in environmental stewardship.

The procedures that implement the EMS apply, where appropriate, to the company activities at Rockrush Aggregates Ltd, and are operated under the same common management system.

### **Environmental Risks and Effects**

The company has identified and documented Environmental Risks and Effects below to identify the aspects of our activities and determine those which have, or may have, a significant impact on the environment. Where necessary operational controls have been implemented to minimise any potential effect.

## **Legal and Other Requirements**

The key legislation and other requirements which establish the main environmental control over the company's activities are defined within the Register of Environmental Legislation in. Where appropriate, operational controls have been implemented to ensure compliance with relevant legislation.

## **Environmental Improvement Programme**

Agreed objectives and targets, with defined responsibilities for their monitoring, achievement and timescales have been documented: Environmental Objectives will be established on an annual basis taking account of:

- The Environmental Policy;
- The significant environmental aspects based on the Risk Assessment;
- Results of the Audits;
- Legislative and other requirements; and  
Views of relevant stakeholders.

## **Operation & Maintenance**

Operations and activities associated with environmental aspects are controlled by operational procedures referenced in this manual.

## **Accidents and Incidents**

The Company has established and maintains a procedure for incident and accidents in section 1.7 of this manual.

## **Non-conformance, Incidents and Complaints**

The Company has established and maintains a procedure for recording Non-conformance, incidents and Complaints in section 1.8 of this manual.

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## **Environmental Risk Assessment**

The risk assessment below constitutes the typical probability/consequence type risk assessment and identifies generic risks which are deemed to be applicable to the business activities of Rockrush Aggregates Ltd.

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Hazard	Receptor	Pathway	Risk management	Probability of exposure	Consequence	What is the overall risk?
Noise from delivery and unloading of waste	Residents living nearby. Few	Air - Activities on site are potentially audible at residents properties particularly gardens	Ensure activity undertaken in accordance with operating procedures  Activity location benefits from good location away from built up areas.  Record and act on complaints  Limit hours of noisy works to 08:30-17:00	Medium	Annoyance or nuisance to the residents especially during warm summer months when residents use their gardens more frequently	Low
Spillages of liquids or contaminated rainwater runoff from site or leaking from tanks or storage vessels	Groundwater	Indirect run-off through the soil layer, or surface run off	Ensure regular integrity testing of storage vessels and land drains.  Regular inspections of bunds and tanks.	Low	Chronic contamination of groundwater	Low
Firewater control	Groundwater	Indirect run-off through the soil layer, through cracks in impermeable surface or leaks from the underground tanks or drains	Firewater run off can possibly enter the groundwater via the same routes as rainwater.  Rubber mats and bungs to prevent pollution of the surface water system.	Low/medium	Potential contamination of groundwater	Low
Leak from tanks containment	Groundwater	Through surface run off.	Ensure maintenance checks of the bunds and over ground storage tanks are undertaken in accordance with the maintenance programme and checks are recorded.	Low	Chronic contamination of groundwater	Low
Spillage of hydraulic oil, petrol from plant	Groundwater	Through surface water run off	Ensure maintenance checks of equipment are undertaken in accordance with the	Low	Chronic contamination of groundwater	Low

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and machinery			<p>maintenance programme and checks are recorded.</p> <p>Ensure appropriate staff are fully trained in the operational and spills procedures</p>			
Arson or vandalism causing the release of pollution material to air, water or land	Adjacent residents	Air transport of smoke or spillages and contaminated firewater by direct runoff from site.	<p>Gates are closed and locked outside of office hours to block access further.</p> <p>Regular checks of the Perimeter.</p>	Medium	<p>Harm to health respiratory irritation</p> <p>Pollution of water via off site surface water drainage or adjacent land</p>	Low
Flooding of site	Sensitive receptors	Flood waters	<p>There are watercourses nearby and the site is in a zone 3 floodplain .</p> <p>All storage vessels have secondary containment</p> <p>Ensure onsite drains are kept clear</p>	Very Low	If waste is washed off the site it may contaminate land drains/ditches.	Very Low

1.4 Legal Register

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Legislation	Relevance	Applicable to which processes	Where held?	Person responsible for compliance
Environmental Permitting Regulations 2014	The site requires an environmental permit to operate. Environmental permitting is a risk-based regime for regulating business activities that could have an impact on the environment or human health.	Storage, handling and treatment of waste on the site	Copy held in site office	Owner
Environmental Protection Act 1990 (Part II & Part III)	Defines the legal framework for duty of care for waste, and statutory nuisance.	The transfer of waste from site and the impact of operations on neighbouring residents.	Copy held in site office	Owner
Provision and Use of Work Equipment Regulations 1998 (PUWER)	Establishes requirements for those owning and controlling equipment used at a work's premises	hydraulic plant/grader	Copy held on site	Owner
Health & Safety at Work Act 1974	Establishes requirements for risk assessment for those working in potentially hazardous conditions	Working close to machinery Operating machinery	Copy held on site	Owner
Waste Framework Directive 2008/98/EC	Lays down controls for the safe disposal and recovery of waste. Article 13 lays down the objective that waste is recovered or	All site storage handling and treatment of waste on site.	Copy held in site office	Owner

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Legislation	Relevance	Applicable to which processes	Where held?	Person responsible for compliance
	disposed of without endangering human health and without using processes or methods that could harm the environment.			
Control of Pollution (Oil Storage) (England) Regulations 2001	Applies where oils including (petrol, diesel, mineral oils) are stored on site in containers larger than 200 litres	Operation of equipment for materials handling on site	Copy held in site office	Owner
The List of Wastes Regulations 2005	Contains a harmonised list of hazardous and non-hazardous wastes	The operator needs to understand the properties of the wastes produced on site to ensure safe and secure storage and handling.	Copy held in site office	Owner
Waste (England & Wales) Regulations 2011	Duty of care requirements and information required on a waste transfer note	Handling, storage and transfer of Waste	Copy held in site office	Owner

### 1.5 Site Objectives

Rockrush Aggregates Ltd aims to operate in a way that minimises pollution to the local environment and does not pose a threat to any of our immediate neighbours by way of pollution, noise or disturbance. Further quantified objectives will be documented after the first year of operation of this EMS.



## 1.6 Operational Control

Rockrush Aggregates Ltd has developed a number of operational control procedures by which it undertakes its operations. These are listed here

- Firewater management (EP1)
- Noise management (EP2)
- Spills and incidents (EP3)
- Waste Management (EP4)
- Checks and Inspections (EP5)
- Mud & Dust (EP6)
- Complaints and Neighbourly Relations (EP7)
- Vehicles & Plant (EP8)

## 1.7 Incidents and Accidents

The following table references other procedures and responsibilities in the event of an emergency situation

No	Activity	Responsibility	Documentation
1	The following plan and associated supporting documents should be adhered to in the event of any of the following environmental accidents or incidents: <ul style="list-style-type: none"><li>• Failure of storage tanks;</li></ul>	Owner and all members of staff	<ul style="list-style-type: none"><li>• Spillage Response procedure;</li><li>• Fire Response Procedure;</li></ul>

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	<ul style="list-style-type: none"> <li>• Leak from bowsers or oil storage tanks containment failure of bunds and impermeable surface;</li> <li>• Spillages of hydraulic oil, petrol and diesel during sorting and grading</li> <li>• Accidental fire causing release of smoke and fumes;</li> <li>• Arson or vandalism causing the release of pollution material to air, water or land; and</li> <li>• Flooding of site.</li> </ul>		<ul style="list-style-type: none"> <li>• Accident and Incident Management Plan;</li> <li>• Site Plan;</li> <li>• Key Site and Emergency Contacts;</li> <li>• List of PPE; and</li> <li>• Accident, Incident &amp; spill Record.</li> </ul>
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**1.8 Incidents and Complaints**

No	Activity	Responsibility	Documentation
1	In the event of a complaint made to the site, the complaint record must be completed, and record kept	Owner	Complaint Record