

# Environmental Management System

Prepared by: Kate Brady

For: Ringway Infrastructure Services Ltd

Site: Newport Pagnall

Date: 26/06/2025

Document Ref: 316660 EMS

Issue-1.0



# Contents

- 1. Environmental Management System ..... 1
- 2. Site Infrastructure Plan ..... 1
- 3. Site Operations ..... 2
- 4. Site Equipment and Maintenance Plan ..... 2
- 5. Contingency Plan ..... 3
- 6. Accident Prevention and Management Plan ..... 3
- 7. Changing Climate ..... 3
- 8. Complaints Procedure ..... 4
- 9. Competence and Training ..... 4
- 10. Records ..... 4
- 11. EMS Review ..... 4

# Tables

- Table 1 EMS Summary ..... 1
- Table 2-1 Operating hours ..... 2

# 1. Environmental Management System

An Environmental Management System (EMS) is a document required by a permit and a typical permit condition 1.1.1 states that, " The operator shall manage and operate the activities... in accordance with a written management system" and "records demonstrating compliance with rule 1.1.1 shall be maintained."

The complexity of an EMS is proportionate to the Proposed Development and the site specific EMS will be developed in accordance with the latest Environment Agency Guidance (available at Develop a management system: environmental permits - GOV.UK (www.gov.uk)). The EMS will explain how the Operator will manage their activities whilst minimising the risk to the environment. This document provides the proposed structure and summarises the content of the EMS.

The content of the EMS is summarised in Table 1 below.

**Table 1 EMS Summary**

	Section	Description
1	Site Infrastructure Plan	A plan showing the permit boundary, site layout with storage locations, drainage and nearby sensitive receptors including, water courses, protected habitats and buildings.
2	Site Operations	Description of waste activities and storage plan.
3	Site Equipment and Maintenance Plan	Provide details on the manufacturers recommendations for maintaining infrastructure and equipment.
4	Contingency Plan	Explain the steps taken in the event of a breakdown, shutdown or in the event of abnormal operating conditions.
5	Accident Prevention and Management Plan	A plan describing how to deal with incidents or events that have the potential to pollute the environment or result in a non-compliance to the permit.
6	Changing Climate	Considerations of how a changing climate could affect waste activities or ability to comply with the permit.
7	Complaints Procedure	Methodology for dealing with a complaint including; records, investigation and action.
8	Competence and Training	Roles and responsibilities of staff will be defined along with training and qualifications of staff or contractors.
9	Records	Record management will be determined including timescales and locations of documents required to comply with the permit and legislation (for example duty of care requirements).
10	EMS Review	A procedure for reviewing the EMS and checking waste activities are in compliance with the permit will be provided. Defined timescales or events resulting in an EMS review will also be included.

## 2. Site Infrastructure Plan

The site infrastructure comprises a concrete storage bay with aco drain across the front, which drains to a Class 1 hydrocarbon interceptor and silt trap, before draining to foul sewer.



A skip/ container is maintained on site for use as a quarantine facility ,which is capable of containing the contents of the largest delivery vehicle (10m<sup>3</sup>).

The site infrastructure is visible on the Site Layout Plan 316660 DW02.

### 3. Site Operations

Ringway Infrastructure Services Ltd (the ‘Operator’) operates a maintenance contract on behalf of National Highways covering sections of the M1, A5, A1M & A421 in the vicinity of Newport Pagnall services (MK16 8DS). Maintenance includes clearing drains and gullies along these stretches of road and roadsweeping, including responding to incidents such as flooding or spills.

The proposed waste operation is to temporarily store and allow dewatering of incidental streetsweeping waste and gully emptying waste collected as part of the National Highways maintenance. Due to the nature of the maintenance role, the operation will be operated over 24 hours. During this time, allowance is made for receipt of up to 10 x waste deposits per 24 hours, though in practice it is anticipated to receive just 1-3 deliveries per 24hr period.

**Table 3-1 Operating hours**

Specified waste management operations	Operating hours
Waste Acceptance and Removal	24 hours (motorway service contract)

The waste operation will comprise the following infrastructure:

- Engineered concrete storage bay
- Aco drain
- Class 1 hydrocarbon interceptor and silt trap
- Foul sewer connection for drained wastewater.

The operator will deposit streetsweepings and gully emptyings into the storage bay.

Streetsweepings may be simply tipped into the bay.

Gully emptyings will be pumped out of the delivery vehicle and directed to the aco-drain so that it is not overloaded. Once the volume is reduced, the remaining solid/liquid remaining in the vehicle may be tipped into the bay.

Once drained, the fines may be loaded onto a receiving vehicle for recovery or disposal at a suitably permitted site.

### 4. Site Equipment and Maintenance Plan

The Site will implement checks and maintenance in line with manufacturers recommendations.

The site will implement routine checks on equipment on Site in accordance with the preventative maintenance checklist.



## 5. Contingency Plan

The Site will implement a Contingency Plan for dealing with any incidents or events that could result in pollution or not being able to comply with the environmental permit.

## 6. Accident Prevention and Management Plan

The Site will implement an Accident Prevention and Management Plan for dealing with any incidents or events that could result in pollution or not being able to comply with the environmental permit.

## 7. Changing Climate

Risk has been assessed using a qualitative matrix:

- **Likelihood:** Low / Medium / High
- **Consequence:** Minor / Moderate / Major
- **Risk Rating:** Low / Medium / High

	Hazard	Impact	Likelihood	Consequence	Risk	Controls
1	Extreme rainfall	Flooding and contaminated runoff discharge. Increased intensity (~20%).	High	Minor	Medium	Storage of low volumes of solids only. Option to increase frequency of solid collections.  Option to pause deliveries should site/ sewer flood due to extreme rainfall.
2	High rainfall	Increased run-off volume exceeding storage capacity. Increased frequency.	High	Minor	Medium	Option to increase frequency of solids collections to reduce volume of solids in contact with rainfall. Runoff remains to sewer so risk to environment is low.
3	Heatwaves	Plant stress / damage to pipework and seals. Increased temperatures (>40°C possible) 4°C rise by 2100 and plan for a 2°C rise by 2050.	Medium	Minor	Low	Maintenance programme. Consideration to storing plant under cover on the wider site should temperatures lead to failures.
4	Drought	Dust emissions from dry materials. Reduced water availability.	Low	Moderate	Medium	Materials are likely to be saturated /wet prior to collection. Consideration to increasing frequency of solids collection during



	Hazard	Impact	Likelihood	Consequence	Risk	Controls
						prolonged dry periods. Undertake site inspections for dust emissions.
5	Storms	Damage to infrastructure and waste containment. Increased severity.	Low	Minor	Low	Secured storage areas constructed from concrete – unlikely to be damaged from storms.
6	Extreme weather	Disruption to waste disposal and site operations. Continued variability.	Medium	Minor	Medium	Contained storage. Option to suspend deposit activities during extreme weather conditions which risks loss of containment.

## 8. Complaints Procedure

All complaints will be investigated by the Site Manager. The outcome of the investigation is recorded.

## 9. Competence and Training

The Site will be managed by suitable Technical Competence Management (TCM). The designated TCM will be appropriately trained for the management of non-hazardous materials.

The TCM will be

## 10. Records

Records are kept for the following;

- Wastes accepted to site
- Wastes removed from site (including volumes of waste water discharged from site)
- Waste returns
- Monitoring data undertaken
- Complaints (any received and their response).

## 11. EMS Review

The EMS will be reviewed annually to confirm it remains appropriate for the activities that are being undertaken. The EMS will be updated following a change to the waste operations which require a change in the management system.



## **Appendices: Procedures**



# Appendix A: Waste Acceptance Procedures



# Waste Acceptance Procedures

Prepared by: Kate Brady

For: Ringway Infrastructure Services Ltd

Site: Newport Pagnall

Date: 18/05/2026

Document Ref: 316660 WAP

Issue-1.0

# Contents

<b>1. Introduction .....</b>	<b>3</b>
1.2 Site activities .....	3
<b>2. Waste Acceptance Procedure.....</b>	<b>4</b>
2.1 Purpose.....	4
2.2 Technical guidance .....	4
2.3 Training .....	4
2.4 Pre-acceptance procedure .....	4
2.5 Waste Acceptance Procedure .....	6
2.6 Waste Tracking .....	6
2.7 Waste rejection procedure .....	7
<b>3. Waste storage and handling.....</b>	<b>9</b>

# Tables

Table 1-1 Waste rejection triggers.....	7
---	---



# 1. Introduction

- 1.1.1 The document has been prepared for Ringway Infrastructure Services Ltd ‘the Operator’ and forms a Waste Acceptance Procedure (WAP) in support of the permitted operations at:

National Highways Newport Pagnall depot,  
next to Newport Pagnall Services at Junction 14/15 M1,  
Newport Pagnell  
MK16 8DS

## 1.2 Site activities

- 1.2.1 The Operator operates a transfer station and treatment operation for the storage of street sweepings and gully waste. Surplus water from the road cleansing activities are discharged to foul sewer. The total waste throughput is estimated to be a maximum of 11,000 tonnes per annum.
- 1.2.2 Wastes are regularly generated wastes from a single source and collected by the site operator. Wastes arise from routine maintenance activities.

## 2. Waste Acceptance Procedure

### 2.1 Purpose

2.1.1 To ensure only appropriate waste is accepted, managed, and tracked in compliance with the Environment Agency’s guidance for permitted waste facilities.

### 2.2 Technical guidance

2.2.1 This procedure has been created in line with the Environment Agency’s Guidance:

- Develop a management system; environmental permits<sup>1</sup>;
- Non-hazardous and inert waste: appropriate measures for permitted facilities<sup>2</sup>;

### 2.3 Training

2.3.1 Waste will only be accepted and rejected from site by suitably trained staff.

### 2.4 Pre-acceptance procedure

2.4.1 Pre-acceptance checks begin with the initial service request from the Operator’s Client, National Highways, aligned with their scheduled cleaning. The Client specifies whether the service involves attending a spill. In such cases, the operator will arrange for onward transport of the resulting collected material to a suitably permitted facility for recovery or disposal.

2.4.2 Only street sweepings and gully waste generated through routine maintenance are accepted at the site. This waste is accepted under waste code 20 03 03.

20	<b>Municipal wastes (household waste and similar commercial, industrial and institutional wastes) including separately collected fractions</b>
20 03	Other municipal wastes
20 03 03	Street cleaning residues, gully wastes only.

2.4.3 The following information will be recorded and kept for each load of waste. As the waste will be generated from regular and planned works, it is likely that the waste may be moved on a season ticket (Waste Transfer Note).

2.4.4 Before any waste is accepted, the following information must be obtained from the waste producer or carrier:

- Waste producer details and contact information

---

<sup>1</sup> [Develop a management system: environmental permits - GOV.UK](#)

<sup>2</sup> [Non-hazardous and inert waste: appropriate measures for permitted facilities - 3. Waste pre-acceptance, acceptance and tracking - Guidance - GOV.UK](#)



- Waste description, including source and EWC<sup>3</sup> code
- Origin and process that generated the waste, including any variability
- Physical and chemical characteristics
- Composition and potential contaminants or notable factors e.g. odour
- Waste quantity and form (solid, liquid, sludge)
- Any prior treatment or handling steps
- Anticipated quantities (per load/ per year)

2.4.5 The Site accepts a single waste code only, namely street sweepings and gully waste from street cleansing activities (LoW 20 03 03). The Operator's client will provide pre-acceptance information at the point of instruction. As work is often instructed on a contract or campaign basis, a season ticket (Waste Transfer Note) may be generated for each contract.

2.4.6 The client notifies the Operator of any pollution events or spillages which may mean that the street cleansing will need to be delivered to another permitted site.

2.4.7 The information required, and assessment made, at pre-acceptance stage will ensure that the site:

- Only accepts waste suitable for the site,
- avoid accumulation of waste; and
- have enough storage and treatment capacity.

2.4.8 The Technical Assessor reviews the information to determine suitability.

2.4.9 If waste is deemed unsuitable, the customer is notified with reasons for rejection.

2.4.10 If suitable, a unique pre-acceptance reference number is issued and a waste stream record is created in the tracking system.

2.4.11 Each load will be accompanied with a Waste Transfer Note. A season Waste Transfer Note may be issued for each contract awarded to the Operator.

2.4.12 A copy of waste acceptance information and pre-acceptance documentation must be retained for at least 2 years (or 3 years for any wastes determined to be hazardous and rejected from Site).

2.4.13 The information required at pre-acceptance will be reassessed if the:

- waste changes
- process giving rise to the waste changes
- waste received does not conform to the pre-acceptance information

---

<sup>3</sup> also referred to as a List of Waste (LoW) or European Waste Classification code

2.4.14 In all cases, waste will be reassessed annually or for each new contract, whichever is sooner.

## **2.5 Waste Acceptance Procedure**

### **Waste Arrival Checks**

2.5.1 When waste arrives at the site:

- The driver is admitted to site via the gated entrance, by the receptionist.
- The waste is checked against the pre-acceptance documentation.
- Details are verified: EWC code, source, quantity, carrier, and documentation.

2.5.2 Visual Inspection

- A trained operator inspects upon arrival at Site.
  - Streetsweeping waste will be deposited in the bay and visually inspected
  - Gully waste arriving in tankers – some of the load will be discharged into an inspection container for visual inspection. Once confirmed that the waste is as expected and free from contamination (e.g. oil), it will be deposited within the bay.
- Visual checks confirm the waste matches the pre-acceptance description.
- Loads failing the inspection are quarantined and reported to the Site Manager.

2.5.3 Recording

- The load volume is recorded (based on delivery vehicle capacity).
- The delivery is entered into the site's waste tracking system.

2.5.4 Waste Acceptance Decision

- If compliant, the waste is accepted and recorded.
- If not, the waste is either quarantined or rejected and directed to a suitably permitted facility.

## **2.6 Waste Tracking**

### **Tracking system**

2.6.1 All waste movements are logged in a tracking system that includes:

- Unique reference number
- Date/time of delivery
- Source and origin of waste
- waste pre-acceptance and acceptance information
- identifies the staff who have taken any decisions about accepting or rejecting waste streams and who have decided on recovery or disposal options
- details that link waste to relevant transfer notes
- EWC code and description



- Quantity received and destination on site
- Storage, treatment, or disposal route
- Final output destination (if applicable)
- details of any non-conformances and rejections, including consignment notes for waste rejected because it is hazardous.

2.6.2 The waste tracking system will record:

- the quantity of waste present on site at any one time.
- the quantity of waste awaiting onward transfer.
- The waste storage limits from permit and management system
- the location of stored waste.
- the length of time the waste has been on site compared with the limits in your management system and permit

2.6.3 The acceptance records are held for a minimum of 2 years after the waste has been treated or removed off Site (or 3 years for wastes found to be hazardous and rejected from Site).

2.6.4 The waste tracking information will be readily accessible by staff and the Environment Agency upon request.

**2.7 Waste rejection procedure**

2.7.1 Any incoming loads that do not meet the waste acceptance criteria will not be granted permission to unload or will be reloaded and removed from the Site as soon as possible. If this is not possible the non-conforming material will be placed within the quarantine area until it can be loaded out.

2.7.2 The Site has a dedicated waste quarantine area or area used for temporarily storing waste that has been rejected. Where appropriate the quarantined waste will be in containers or covered to prevent emissions. Odorous materials are not permitted on Site, however, if they are quarantined the waste will be removed within 24 hours or sooner.

**Table 2-1 Waste rejection triggers**

Waste rejection triggers
a) No Waste Transfer Notes
b) Material contamination
c) No current site capacity to process material
d) EWC codes do not match waste description

2.7.3 The Site Manager will be contacted to explain the reasons for the waste rejection, and this will be recorded in the site diary and will include:

- Date and time of non-conformance
- Description of what happened
- What caused the non-conformance
- What was done to make sure this does not occur again
- Was there any significant pollution
- If there was significant pollution – the Environment Agency must be notified: record the time, date and Environment Agency incident number.

## 3. Waste storage and handling

3.1.1 All waste will be deposited, treated (dewatering) and stored, within the designated concrete bay.

### **Unloading – gully waste**

Gully waste will arrive to site in 10m<sup>3</sup> tankers. The waste composition is anticipated to be approximately 20:80 solid to liquid ratio. Within the tanker, the incoming waste cannot be visually inspected.

The tanker will reverse into the storage bay. A water sample will be collected from the discharge valve at the rear of the tanker to visually check the material is not contaminated i.e. free from oil or other contaminants.

Once inspected, the rear of the tanker vehicle will be slowly opened, allowing the water fraction to discharge slowly. If a surplus of water has been collected, wastewater will be discharged directly into catchpit prior to class 1 interceptor to avoid surcharging.

When initial water has drained, the rear of the tanker will be fully opened and the remaining waste will be tipped directly into the bay in a controlled manner, preventing spillage.

The gully at the front of the concrete bay captures the water fraction from the gully waste being deposited.

This gravity water separation comprises the waste treatment element of the activity.

The bay is designed with a return loop which catches any overflow water past the gully of the concrete bay and passes it through the silt trap and interceptor, before discharging to foul sewer. This prevents entry to the surface water sewer system.

### **Unloading – street-sweeping waste**

Vehicles will reverse into the designated bay under banksman supervision. Sweepings are tipped out into the bay. Incidental water present will passively drain to sewer via aco drain and class 1 interceptor.

### **Waste storage**

Unless quarantined, liquid wastes are not stored on site and are instead allowed to drain to foul sewer.

Solid wastes are stored within the waste storage bay. Solids are periodically loaded from the bay to awaiting removals vehicle, for recovery or disposal off site at a suitable facility.

## Appendix B: Preventative Maintenance Checklist

Checked by:		Position:			
Date:		Date of last checklist:			
	Equipment Item				
Official maintenance check required (Y/N)					
If no, date of last check					
If yes, date of next check					
Is item in correct working order					
Leakages of oil/diesel on mobile plant / vehicles checked (Y/N)					
If no, what repairs are required (use separate sheet if required)					
Were repairs detailed on the last checklist					
If yes, have they been carried out					
Additional repairs or actions required					

## Appendix C: Complaints Record

<b>Date recorded:</b>		<b>Reference number:</b>	
<b>Who made the complaint:</b>			
Name:			
Address:			
Phone No:			
Date and time they made the complaint:			
What was the reason / nature of the complaint?			
Was anyone else aware of this? If so, who?			
What was the source of the problem, what went wrong? If source is unknown contact a suitably qualified person to investigate?			
What have you done to make sure it won't happen again?			
Was there any significant pollution (e.g. oil entering a surface water drain)?			
If there was then you must notify NRW		Yes / No / not applicable	
Have you done so?		Time:	
You must also notify NRW via email or letter.		Date:	
		NRW Incident number:	
Please print name and sign:			



## Appendix D: Site Inspection Form

Week starting:							
Type of inspection	Day						
	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Sunday
Site entrance/notice board is present and legible							
Security – gates (good working order, checked for damage/defects, lock intact)							
Security - fencing (good working order, free from damage/defects),							
Site roads (clear from hazards)							
Site access road clear from mud, debris and litter							
Waste storage bay is not compromised							
Drainage system is clear and operating as it should							
Waste storage area – is below capacity							
Noise levels are moderate							
Fires (none, any incidents reported)							
No smoking signs in place							
Fire fighting equipment in place (vehicles)							
Plant/equipment maintenance checks							
Litter (none on site nor outside site boundary)							



Week starting:							
Type of inspection	Day						
	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Sunday
Dust (none leaving site boundary - visual inspection)							
Odour (no offensive, olfactory inspection)							
Vermin (none/ no evidence of)							
Flies/insects (none / no evidence of)							
Scavenging birds (none / no evidence of)							
Records completed							
Complaints received (recorded)							
Other (see notes below)							
Inspection carried out by							
Notes/action (continue on a separate sheet if necessary):							
Checked by:				Signature:			
TCM:				Date:			



## Appendix E: Severe Weather Events and Near Misses Record

Information	Description
Date	
Weather event	
Extent of incident	
Damage or effect to the business and / or environment	
Immediate action taken	
Proposed prevention or mitigation measures	





# Appendix G: Training Needs Checklist

Employee Name:		Date:								
Position:		Review Due:								
Training carried out by:										
Position										
Training required	General operatives		Plant operator		Yard manager		Technically competent manger		Other (please specific)	
Carried out?	Y/N	Signed by Employee	Y/N	Signed by Employee	Y/N	Signed by Employee	Y/N	Signed by Employee	Y/N	Signed by Employee
Site rules & infrastructure										
Emergency procedures										
Fire safety / Fire fighting										
Waste acceptance / testing/ rejection										
Storage areas / limits										
Record keeping										
Vehicle checks (preventative maintenance)										
Plant checks (preventative maintenance)										
Drainage system checks										
Duty of care waste transfer notes										
Plant operation – loading plant										
Management system & permit										
Other 1 (please specify)										
Other 2 (please specify)										

