

TELFORD WAY ENVIRONMENTAL MANAGEMENT SYSTEM

1 Introduction

This Environmental Management System (EMS) governs operations at the Telford Way site. Consequently, operational procedures will ensure that all appropriate pollution prevention and control techniques are delivered reliably and on an integrated basis. The environmental management system assists in maintaining compliance with regulatory requirements and managing environmental impacts.

2 Environmental Management System Overview

The management structure that will be responsible for the site is as follows:

Managing Director – Simon Hedley

Group Director – Richard Chinn

Operations Manager – Adam Patrick

Site Manager – Lee Wesby

The Emergency Contact telephone number 07793529629 is for the Site Manager, Lee Wesby. The Site Manager will be responsible for day to day operations, compliance with the Environmental Permit and will be accountable to the Group Director.

2.1 Technical Competence

The site activities will be managed by a person who is technically competent and has the appropriate qualification as required by Regulation 4 of the Pollution Prevention and Control (England and Wales) Regulations 2000.

Mr Adam Patrick provides Technical Competence by means of being Waste Management Industry Training and Advisory Board (WAMITAB) qualified. The WAMITAB is included within Appendix A.

2.2 Training

All staff involved in the site operations receive training to ensure that they are familiar with the current requirements for running the site. Most of this training is provided internally by the Site Manager and usually involves on-site instruction and demonstration. Externally

provided training courses are used, as necessary.

Site staff are familiar with the general requirements of operating an soil treatment site under Environmental Permit SR2010No12.

Records of all training, both that provided internally and externally are kept at the operator's head office/site office.

The need for staff training is reviewed annually for each employee and recorded in the Company's Quality System Training Assessment file. A separate file is held for each employee.

The training programme will ensure that relevant staff are aware of the following:-

- Regulatory implications of the permit for the site and their specific work activity;
- All potential environmental effects from operations under normal and abnormal circumstances;
- The need to report deviations from the permit; and
- Prevention of accidental emissions and action to be taken should accidental emissions occur.

2.3 Managing Documentation and Records

All documents that are needed to comply with the conditions of the Permit will be contained within a separate and easily accessible system at the operator's site office/head office. The documents will be under the direct control of the Site Manager, and daily responsibility rests with the Group and/or Managing Director.

Monitoring results will be checked upon receipt, to identify any non-compliance and the need for remedial measures. All documents will be checked no less than once a year, to ensure full compliance with the requirements of the Permit.

Conveyance notes are received at the invoicing office, for entry onto the computer. At this stage all notes are checked for completeness. Random checks are carried out by the technically competent person.

An independent consultant/annual audit may validate document checking, by both regular

and random checking.

2.4 Reporting Non-Conformance and Taking Corrective Action

Non-conformances with Environmental Permit conditions will be recorded, investigated and rectified, and measures will be put in place to avoid repetition of non-conformances. The following aspects will be considered:-

- Actual non conformance;
- System failure discovered at internal audit;
- Suppliers or subcontractors breaking the operating rules or instructions that they have been given;
- Incidents, accidents, and emergencies;
- Other operational system failure; and
- Substantiated complaints.

The action taken in response to the non-conformance may include:-

- Obtaining additional information on the nature and extent of the non-conformance;
- Discussing and agreeing solutions;
- Modifying procedures and responsibilities;
- Seeking approval for additional resources and training; and,
- Contacting suppliers and contractors.

2.5 Monitoring, Measuring and Reviewing Environmental Performance

The Site Manager will review environmental performance and ensure any necessary actions are taken.

2.6 Environmental Policy, Objectives and Targets

There is a commitment to continual improvement, prevention of pollution and compliance with legislation.

Boughton Loam's Environmental Policy can be supplied as required.

2.7 Waste Acceptance Procedures

The procedures for soils acceptance and for dealing with non-conforming materials will be those set out below.

2.8 Material Acceptance

Soils that will be accepted are those identified within Table 2.3 of the guidance for Standard rules SR2010No12 Treatment of waste to produce soil, soil substitutes and aggregate.

Wastes having any of the following characteristics shall not be accepted:

- Consisting solely or mainly of dusts, powders or loose fibres
- Hazardous wastes
- Wastes in liquid form

2.9 Procedures for sampling and testing

The procedures for sampling and testing of incoming waste are as follows:

- It will be made clear to the company's own staff and to third parties delivering to the site that only clean soils will be accepted.
- All incoming delivery vehicles having first obtained permission from the operator's office to use the facility, will be required to produce to the site controller a conveyance note detailing:
 - Supplier of the soil.
 - Address of collection point.
 - Description of material.
 - Waste carrier number.
 - Haulier vehicle number and capacity, drivers name.
 - Date of delivery.

2.10 Non-conforming waste procedures

The site staff will check the delivery note to ensure that the source of material is as identified prior to delivery/acceptance. The incoming material will be visually inspected by the site controller who will either approve the material for deposit/storage, or if considered to be non-conforming the load will be rejected and removed from site. Accepted materials will be directed for storage in stockpiles on the yard. The Site Manager will be responsible for determining the action to be taken.

Monitoring of the site and the delivery notes will be carried out regularly by the Site Manager and at random by the Managing Director/Group Director.

2.11 Soils Identification / Verification

Where possible, the site office will undertake a preliminary visual examination of the soil.

2.12 Material Rejection at Site Office

Incoming materials may be rejected for a number of reasons including:

- Incomplete or unsatisfactory documentation;
- Physical appearance not fitting description on transfer note; and,
- Presence of free liquid in the waste

The Site Manager will be informed of any waste that is rejected due to inaccurate documentation. He/she will then communicate with the Group Director and the supplier, advising that the load has been rejected and the reasons why.

3 Site Details

3.1 Site Address

Boughton Loam Ltd, 12 Telford Way, Telford Way Industrial Estate, Kettering, NN16 8UN

3.2 Operational Location

SP 86052 79875

3.3 Description

The site is situated off Telford Way, within the Telford Way Industrial Estate. Telford Way itself is accessed from the roundabout with the A14 providing connections to the M6 and M1 to the west and A1 and M11 to the east. The site is located 1.3km north of the Kettering Town Centre.

The site is bound to the north by a haulage Company, to the east by a north – south configured rail line, to the south by an electric Company and to the west by Telford Way (access).

3.4 Boundary Treatments

The site is bordered to the north by a large soil stockpile which acts as a screening bund between the site and Industrial units to the north. To the east of the site is tree lined hedgerow separating the site from the adjacent rail line. To the southern boundary is a metal fence behind a tree and hedgerow. The western boundary contains the sites access off Telford Way,

as well as a wire fence strengthened by trees and hedges.

3.5 Plans

Site Location Plan – PBL-007-W-SP1 is attached as Appendix B.

3.6 Planning Permission

With regard to planning permission, in 1997 permission was granted for Phases 1 & 2 preparation & production building, machine storage building, elevational treatment to replace damaged cladding on part west elevation of existing production building. Associated car parking & additional landscaping (ref. KE/97/0353).

4 **Operational Overview**

4.1 Arrival to Site

The procedure for arrivals to site with regards to the office and waste acceptance is detailed within Chapter 2 of this EMS. Vehicles arriving to drop off waste will travel to the stockpiling area of the yard to store the soils prior to it being processed (Figure 1).

Figure 1 – Stockpiling Area



4.2 Screening, Drying & Bagging

Stockpiled material is transported to one of two screening machines on site, and then

screened material is either transported into the processing shed on site to be stored in separate bays dependant on material or is stored in stockpiles within the storage yard.

Figure 2 – Processing Shed



There are two bagging sheds on site in which material is fed into and bagged before being stored on the concreted yard to either side of the site office.

4.3 Storage

As mentioned above processed material is stored in the processing shed once screened. Material which has been bagged and ready to sell is then stored outside on the yard for collection from / delivery to clients (Figure 3).

Figure 3 – Bagged Storage



5 Site Engineering

5.1 Access and Parking

The access point into the site is from Telford Way at the southwestern corner of the site. There is provision for parking to the south of the access point within the site.

5.2 Site Office

The site office is located adjacent to the site access point and weighbridge. A printed copy of the Environmental Permit and Environmental Management System will be held in the site office.

The following information and equipment will be kept in the site office:

- Environmental Permit;
- Environmental Management System;
- In-house Inspection sheets/monitoring forms;
- Incoming/outgoing material movement record
- Visitor's book recording all visitors to the site;
- First aid kit;
- Accident book

5.3 Site Operational Area

The site is situated within Telford Way Industrial Estate. The site comprises a concrete surface throughout. Built structures on site include the site office, two bagging sheds and processing shed. The outdoor elements on site include the open storage area which features two screening machines and stockpiling areas.

6 Procedures and Monitoring

6.1 Dust

This section identifies the potential hazards arising from Dust on site and what controls are in place to ensure these risks are mitigated. The scheme below will set out measures that will enable the site operator and the regulatory authorities to manage and control potential dust emissions at the site during the phased workings at the site.

Sources of Dust

There are several potential sources of dust emissions on the site, these include:

- Soil Stockpiles – wind blowing across the stockpiles
- Loading and transport/haulage
- Screening process

Stockpiling of soils, particularly those that are kept outdoors are at risk of producing visible windblown dust.

The screening process involves the processing and stockpiling of mineral on site. Transport of mineral to these machines disturbs the stockpiles of soil creating dust emissions. When the soil is being screened the finished product falls from a height to the ground creating a new pile; as it does so there is potential for dust to spread, particularly on windy days.

Site haulage can be a great source of fugitive dust on site meaning there is a need requirement to maintain a smooth well-drained surface. Maintenance of the site surface and limitation of vehicle speeds will therefore be important in minimising dust emissions.

Potential Dust Impacts

The paragraph above outlines the potential dust sources on site. This section explores the potential risk posed by dust emissions and occasions when dust impacts may be worst.

During hot/dry weather (particularly during extreme adverse weather events) dust emissions have the potential to blow towards neighbouring receptors. There is also the risk for inhalation of dust for the employees on site and nearby receptors.

Suppression Measures

Spray bars (Figure 4) are attached to taps on site, these are operated when wind is blowing towards neighbours to suppress the airborne dust. There is also a 1000ltr water bowser (Figure 5) on site to damp the yard floor, this is done with a petrol water pump attached to spray bar nozzles.

The impact of dust on employees and receptors can be controlled by the spray bars around site creating a curtain of water to prevent dust escaping from site towards neighbours along with the water bowser on site. Further to this, machines on site are fitted with cab filtration, serviced regularly and filters replaced when needed. Employees are to wear face masks or stand outside of the bagging shed when bagging cricket loam and turf dressing as these two products are dusty. Sack placer is used to move employee away from source of dust. A hood is fitted around 320/18 bagging machine with LEV fitted directly on it to prevent airborne dust. A Hoover is used to prevent the sweeping of dust. Finally, monitoring is completed by an external company and results fed back to site manager. The existing boundary treatments work towards protecting neighbours by trapping airborne dust particles within the confines of the site.

All site employees will receive training on measures to reduce dust emission to ensure safe working.

Complaints Procedure

In the event of a complaint being received by the Operator concerning potential dust impacts detailed in the monitoring scheme, the following steps regarding the process and scope of investigation/assessment will be undertaken:

- All complaints regarding dust will be recorded;
- The location of the affected receptor including the date and time will be recorded;
- The description of site activity(ies) will be recorded;
- Weather conditions, including wind speed and direction will be recorded; and
- Proposed monitoring and/or remedial measures determined to be necessary

including a timeframe and location details as appropriate will be set out (in some cases a full investigation or monitoring may not be required as matters could be readily addressed (with the actions taken recorded)).

The Operator will instigate an immediate investigation and take any subsequent remedial action.

Figure 4 – Spray Bars to the south of the site



Figure 5 – Water Bowser



6.2 Noise

This section acts as Noise Management Scheme for the site. The scheme shall be reviewed annually and if pertinent the EA will be notified of amendments.

Sources of Noise

Onsite there are five identified activities which are a source of noise. These are:

- Bagging Operations
- Process area
- Operation of JCB TM 420Bucket – internal and external
- Work around / on Terex Finlay 684 screen
- Operation of Hitachi ZW220 Bucket – internal and external

Controls on Site

The points below are means of controlling noise levels specific to the five noise sources

outlined above.

Bagging Operations:

- Plant and machinery maintained with defect reporting arrangements
- Daily checks minimises defects and allows lubrication or repair
- Rotation of task with 50% bagging and 50% palletising on 5 pallet rotation
- Noise measured as below at 81.25 dB spot during bagging and 75 dB spot during palletising warehouse area
- Daily noise exposure 80 dB(A) less 4 dB (allowable variation) below Lower Exposure Action Value
- Hearing protection advised during bagging

Internal Production Area:

- Plant and machinery maintained with defect reporting arrangements
- Daily checks minimises defects and allows lubrication or repair
- Identified hearing protection zone demarked to the front of process area
- None working area
- Noise levels measured at 95 dB at machinery controls within hearing protection zone
- Noise levels measured at 83 dB at 5m from operating machinery
- Noise levels of 77 dB background to general workplace, increases daily exposure to 78 dB(A) below Lower Exposure Action Value

Operation of JCB TM 420Bucket:

- Plant and machinery maintained with defect reporting arrangements
- Daily checks minimises defects and allows lubrication or repair
- Operator controls as instruction door and window closure to provide cab protection (also protects from workplace dust)
- Noise levels measured at 72 dB spot 73 dB(A) in cab whilst scraping and loading, below action levels
- External work would only occur where engine is isolated.
- When running exit levels of 81 dB with 77 dB background to general area, daily exposure only increases to 75 dB(A) in such circumstances
- Directional rear reversing alarm operates at 82 – 85 dB above background

Work around / on Terex Finlay 684 screen:

- Plant and machinery maintained with defect reporting arrangements
- Daily checks minimises defects and allows lubrication or repair
- Start and stop operations are short duration only less than 5 minutes daily for plant operator (See line 5), with spot measurement of 93 dB at start/stop controls in hearing protection zone
- General work area access controlled, operators/ others would not access screen area during operation – none working area
- Hearing protection provided for maintenance as required

Operation of Hitachi ZW220 Bucket:

- Plant and machinery maintained with defect reporting arrangements
- Daily checks minimises defects and allows lubrication or repair
- Operator controls as instruction door and window closure to provide cab protection (also protects from workplace dust)
- Noise levels measured at 66 dB idle and 71 dB loading (spot) 71 dB(A) in cab whilst scraping and loading, below action levels
- External work would only occur where engine is isolated.
- When running exit levels of 88 dB with 66 dB background to general area, daily exposure only increases to 88 dB(A) in such circumstances
- Directional rear reversing alarm operates at 83 – 85 dB above background

Further to the specific points raised above, noise levels within the site and their impact on receptors will be kept to a minimum through maintaining the northern soil bund, as well as the boundary treatments on all four sides of the site which work to reduce noise pollution outside the site.

The Company shall provide training to the operators of the plant in order to emphasise the importance of loading dump trucks correctly to reduce noise generation e.g. reducing drop heights to a minimum and minimising reversing.

Complaints Procedure

In the event of a complaint being received by the Operator concerning potential noise impacts

detailed in the monitoring scheme, the following steps regarding the process and scope of investigation/assessment will be undertaken:

- All complaints regarding noise will be recorded;
- The location of the affected receptor including the date and time will be recorded;
- The description of site activity(ies) will be recorded;
- Weather conditions, including wind speed and direction will be recorded; and
- Proposed monitoring and/or remedial measures determined to be necessary including a timeframe and location details as appropriate will be set out (in some cases a full investigation or monitoring may not be required as matters could be readily addressed (with the actions taken recorded)).

The Operator will instigate an immediate investigation and take any subsequent remedial action.

6.3 Flood Risk

The site is located within Flood Zone 1, the lowest risk of flooding. The site itself has been recently concreted and engineered to lie at a 1:60 slope falling from its high point in the west, bordering Telford Way, to the eastern boundary of the site where water leads into a drainage channel at a slope of 1:5. This drainage channel is an open tank (Figure 6) with an automatic opening door that leads into the nearby mains sewers once the maximum level is reached.

Plan D03 (Revision B), in Appendix C, details the exact specification for the design of the drainage system implemented on site.

Water which falls on the roof of the onsite sheds is collected and reused through the water bowsers as a means of dust suppression.

Figure 6 – Open tank used for drainage



6.4 Risk assessments for bespoke permits

EA Guidance is that you must do a risk assessment if you want to apply for or change (vary) a bespoke permit, unless the Environment Agency can do your risk assessment. When applying for a bespoke permit but most of your activities are covered by standard rules, you only need to do a risk assessment for the activities or risks that are not covered by the generic risk assessment for those standard rules.

Primarily the operations are covered by the generic risk assessments for Standard Rules Permit 2010 No.12. The operator only needs to apply for a bespoke permit as the operations do not meet parameter 7 of the risk criteria in that the site boundary is within 50m of a site that has relevant species or habitat protected under the Biodiversity Action Plan that the Environment Agency considers at risk to this activity. In this instance that is woodland located to the east of the site on the opposite side of the railway line.

By reason of distance, and the separation of the site by from the sensitive habitat from the railway, it is considered that the only site activity with potential for impact on the woodland is that arising from dust. The application is accompanied by a site specific dust management plan which details the measures in place to control dust emission from the site. In addition, a risk assessment is enclosed.

Appendix A – WAMITAB

Appendix B – Site Location Plan - PBL-007-W-SP1

Appendix C – Plan D03