

Wellingborough IBA Recycling Facility

Environmental Management System

25th April 2022

Updated 23rd March 2023



Notice

This report was produced by Land & Mineral Management for Day Group Ltd for the specific purpose of accompanying an environmental permit application for an IBA Recycling Facility at Wellingborough.

This report may not be used by any person other than Day Group Ltd without express permission. In any event, Land & Mineral Management accepts no liability for any costs, liabilities or losses arising as a result of the use of or reliance upon the contents of this report by any person other than Day Group Ltd.

Document Control

Version	Date	Author / Checked by	Change Description
V0.1	25/10/2021	LL	Drafting
V0.2	28/02/2022	MC	Client review
V0.3	10/03/2022	LL	HBM Additions
V0.5	26/04/2022	LL	Final draft for Permit application
V0.6	23 03 2023	LL	Update on receipt of email EA 13 03 2023

Contact Details:

Lesley Loane
tel: 07970103196
email: ll@landandmineral.co.uk
web: www.landandmineral.co.uk

Contents

1	Introduction	1
2	Site Details including Infrastructure, Engineering & Mobile Plant	2
	Site Location	2
	Operator Details	2
	Emergency Contact Details	3
	Site Layout & Waste Operations	3
3	Operations	7
	Waste Acceptance Procedure	7
	General Process Description	7
	Fuel and other Raw Material Delivery, Handling and Storage	9
	Outgoing Waste / Recyclable By-products	10
	Processed IBAA	10
	Ferrous and Non-Ferrous Metals	10
4	Management of Operations	11
	Daily Site Inspection	11
5	Environmental Control Measures	12
	Dust	12
	Pests & Vermin	12
	Noise & Vibration	12
	Odour	12
	Litter	12
	Mud and Debris	13
	Gas Build up in IBA Storage	13
	Water Health	14
	Flood Risk	14
6	Contingency Provisions	15
	Mobile Plant & Machinery Failure	15
	Investigation of Incidents	15
7	Emergency Procedures	16
	Immediate Response	16

Secondary Actions	16
Reporting	16
Investigation of Incidents	16
Likelihood of Unmitigated Risks	17
Management	17
8 Environmental Accidents – Water & Land.....	18
Loss of Containment	19
9 Environmental Accidents – Fire	20
10 Communication, Record Keeping and Document Control.....	22
Site Diary/Log	22
Other Record Keeping	22
Document Control	22
Complaints	23
Management, Site Staff and Training.....	23
11 Reporting Non-Compliance and Taking Corrective Action	25

Drawings

Site Layout Plan – separately presented

Drainage Plan– separately presented

Appendices - separately presented

Emergency Contact Details - to be provided prior to operations commencing

Equipment & Stores - to be provided prior to operations commencing

ESA IBA Sampling & Testing Protocol

IBA Acceptance, Quarantine and Production Recording Procedure

Method Statement for Processing and Flow of IBA

Procedure and RA – IBA Operating Process

Dust Management Plan

Noise Management Plan

1 Introduction

- 1.1 This document details the Environmental Management System for Day Group Ltd to accompany the Environmental Permit application for the recycling and processing of Incinerator Bottom Ash (IBA) to create Incinerator Bottom Ash Aggregate (IBAA) at Wellingborough.
- 1.2 Day Group Ltd acknowledge their responsibility in managing the environmental impacts of their activities, products and services and is committed to meeting all legislative requirements and standards which relate to environmental aspects. Day Group Ltd seek to continually improve their environmental performance and engage with its staff, customers, public and other stakeholders, such as regulatory bodies or local councils, to this end.
- 1.3 This Management System is a working document and is subject to regular management review and updates.

2 Site Details including Infrastructure, Engineering & Mobile Plant

Site Location

- 2.1 The Site is located within the Finedon Road Industrial Estate, north-east of the Wellingborough, Northamptonshire. The National Grid Reference for the Site is SP 89711 70676.

Operator Details

- 2.2 Day Group Limited
Day Group House
Transport Avenue
Brentford
Middlesex
TW8 9HF

Head Office Telephone No: 020 8380 9600

- 2.3 The management structure that is responsible for the activities at the facility is detailed below. The site manager is responsible for day-to-day operations and compliance with the Environmental Permit (EP) and will hold a relevant WAMITAB qualification.

Directors:

- James Day – Managing Director
- Adam Day – Contracts Director
- Michael Woodward – Production Director

Competent Person(s)

- Michael Woodward – WAMITAB Level 4 Treatment / Transfer of Non-Hazardous Waste;
- Mark Norris – WAMITAB Level 4 Treatment / Transfer of Non-Hazardous Waste.

Site Staff:

Position	Role	Relevant Qualifications
Depot Manager	Overall management of the facility including liaison with ERFs	WAMITAB Level 4 COTC
Deputy	Controlling day to day production and maintenance activities	WAMITAB EPOC
Weighbridge Operator	Controlling vehicles movements, inspections and site security.	

Plant Operator	Operation and maintenance of processing plant	QCF Level 3 and Operator license
Shovel Operator	Stockpiling IBA, feeding plant and loading IBAA	QCF Level 3 and Operator license
Excavator Operator	Stockpiling IBA, excavating and conditioning IBA prior to processing	TBC
Maintenance Person	Routine maintenance and repairs to fixed and mobile plant	
General Operative	General duties, cleaning and assisting other operatives	

2.4 The facility is managed by sufficient staff who are competent to operate the facility without causing pollution. All staff have clearly defined roles and responsibilities. Records are maintained of the training and relevant qualifications undertaken by staff to meet the requirements of each post. In the event of additional cover being needed due to illness or holiday, other staff are deployed at this Site, or suitably qualified agency staff appointed.

2.5 Operations at the facility are under the control of a technically competent person who holds the relevant Certificate of Technical Competence (COTC) under the Waste Management Industry and Advisory Board (WAMITAB) scheme.

2.6 Further information regarding staff training is provided in Section 10 of this document.

Emergency Contact Details

2.7 A full list of emergency contact details for the Site is provided when the facility is operational..

Site Layout & Waste Operations

Site Layout

2.8 A proposed Site Plan and a plan showing proposed drainage measures are included in this EMS. The planning consent and permitting processes may require changes to any plans referenced, as well as operational updates. In due course the EMS for the site will reference copies of “as built” drawings.

2.9 The Site surfacing comprises impermeable concrete hardstanding (250mm and 200mm thick). An IBA storage building is located in the north-western side of the Site. To the east is the processing area, which comprises primary screening station, primary magnet and de-duster screen, crushing station, picking station and eddy current separator station. South of the

processing area is product storage areas and the Hydraulically Bound Materials (HBM) plant. On the southern side of the site is lorry and car parking, offices and ancillary facilities.

Waste Operations

2.10 The main treatment objective at the Facility is recovery of waste. The following primary waste operations will take place on site:

- R4: Recycling / reclamation of metals and metal compounds; and
- R5: Recycling/reclamation of other inorganic materials;

2.11 The IBA is stored within a building during its maturation process and the recycled aggregate is in external bays as a finished product. The storage, both internally and externally, is on impermeable concrete hardstanding with contained drainage.

2.12 All vehicles delivering the raw material to Site are weighed on the Site weighbridge. They are then directed to the IBA storage building where they reverse in. A Site operative will carry out a visual inspection of the load prior to tipping.

Waste Storage Plan

2.13 The IBA is stored to take account of the following:

- Storage time – the raw IBA material requires a suitable maturation period.
- Maximum volume of waste normally stored on site (subject to fluctuations associated with demand and external factors) – 15,500 tonnes of raw IBA in storage building and 20,000 tonnes of finished product before blending and including separately recovered metals.
- Windrows of raw IBA in storage building will be approximately 8m high; material in external bays is stored with 0.5m of freeboard to contain stockpiles within the bay walls.
- Water is available to be added to the stockpiles to maintain stockpile moisture to prevent wind whipping of dust
- Identification of waste types being stored – waste identification is carried out visually and in accordance with the permitted EWC codes.

- Ensuring only permitted waste types are received – through visual inspection and in accordance with the permitted EWC codes.

Access & Site Security

2.14 The following security measures are implemented to prevent unauthorised access:

- Security fencing:
- Security gates – the gates to the facility are closed and locked whenever the facility is unattended:
- Authorised access system – all visitors to the facility is required to sign in and sign out, in the visitor’s book which is held at the Weighbridge / Site control office:
- Remote CCTV monitoring of the facility:
- Security lighting.

2.15 The security measures are inspected at the commencement of each working day. Any defects or damage which compromise the integrity of the Site security is temporarily repaired by the end of the working day and permanent repair made as soon as practicable.

2.16 All inspections, defects, damage and repairs are recorded in the Site Diary/Log.

2.17 In the event of a breach of security at the Site, management is informed. The cause is investigated and appropriate mitigation measures implemented. Details of the breach, the investigation and actions taken is noted in the Site Diary/Log.

2.18 The Site access and boundaries are inspected on a regular basis by Site Staff. Should any repairs be required, they are noted in the Site Diary/Log and actioned within five working-days.

Site Identification Board

2.19 A Site Identification Board is located and maintained at the entrance to the Facility and includes the following information:

- Permit Holder’s name;
- Emergency contact name and telephone number;
- A statement that the site is permitted by the Environment Agency;
- The Permit number; and

- Environment Agency telephone number 03708 506506 and the incident hotline number 0800 807060 (or another number, if the EA have requested it in writing).

Maintenance of Fixed Infrastructure

- 2.20 Site infrastructure i.e., fences, site roads, lighting etc., is inspected on a regular basis by Site staff. Should any repairs be required or conditions likely to give rise to a pollution risk, they are noted in the Site Diary/Log and actioned within five working days.

Mobile Plant

- 2.21 Site staff are responsible for ensuring all plant is maintained in a good working condition with regular inspections, testing and maintenance undertaken in accordance with the manufacturer's specifications and / or company policy. The mobile plant that is used on site includes (but is not limited to):

- Loading shovel;
- Excavator;
- Telehandler;
- Bobcat.

- 2.22 Records are maintained of all servicing and calibration of equipment / plant held in the Site Office.

Equipment & Stores

- 2.23 An inventory of Equipment and Stores will be included when the facility is operational.

3 Operations

- 3.1 The IBA Recycling Facility is used for recycling Incinerator Bottom Ash (IBA) to manufacture high grade secondary aggregates known as Incinerator Bottom Ash Aggregates (IBAA). The proposal also includes an HBM plant, but this doesn't form part of the Permitting process. .
- 3.2 An estimated daily total of 1000 tonnes of IBA per day is recycled through the facility. As part of the process, ferrous and non-ferrous metal is recovered from the IBA. The quantity of IBA waste processed through the facility is 200,000 tonnes per annum.
- 3.3 It is Day Group's aim that less than 1% of the material imported for recovery / recycling is disposed of as waste residue.

Waste Acceptance Procedure

- 3.4 The facility accepts the following categories of waste. Notwithstanding the specification of permitted waste types, wastes which consist solely of, or mainly of dusts, powders, liquids, sludges or loose fibres are not be accepted at the facility.

Waste Code	Description
19	Wastes from waste management facilities, off-site waste water treatment plants and preparation of water intended for human consumption / industrial use
19 01	Wastes from incineration or pyrolysis
19 01 12	Bottom ash and slag other than those mentioned in 19 01 11
19 12 12	Other wastes (including mixtures of materials) from mechanical treatment of wastes other than those mentioned in 19 12 11 being treated IBA

Acceptance

- 3.5 To ensure that only the permitted waste types are accepted, all waste arriving at the Site is subject to the Waste Acceptance Procedures set out in the ESA IBA Sampling and Testing Protocol and the IBA Acceptance Quarantine Production Recording. Both documents will be updated as required during operations.

General Process Description

- 3.6 After tipping of the raw IBA in the storage building, it is stockpiled in windrows and left to hydrate in order to achieve the appropriate pH level. This is done in accordance with the details in the Procedure and RA -IBA operating process appended.

- 3.7 A water-based dust suppression system operates within the storage building to prevent emissions of dust and to maintain the correct level of moisture within the unprocessed material. The dust management plan which is part of this EMS details the control measures.
- 3.8 The IBA storage building will have an open front and vented ridge thus preventing a build-up of explosive / flammable gas.
- 3.9 Good housekeeping is maintained on Site at all times. A Bobcat type loader is used for clearing up and an industrial vacuum cleaner is used as necessary.
- 3.10 Processing can be divided into two stage as noted below. However it is important to note that the plant and equipment is refined and updated as the site is operations, so this description is broad based and may be subject to amendments on any particular element, albeit the controls and processes will remain with the same aim.

Stage 1 – Feeding

- 3.11 Material is fed via a hopper that buffers raw IBA onto the variable speed vibrating conveyor. An air extraction system (current design details are for a wet scrubber) is fitted to this hopper to deal with vapour and a small amount of dust. The feed regulates the flow of material, ensuring the process plant is fed at a continuous rate. The conveyor is fitted with a 200mm grizzly to remove oversize material which would otherwise damage the plant. Typically, between 3% and 5% of the raw IBA is removed as oversized material. Oversize material is returned to the working face of the IBA storage area and broken up using the excavator before being reloaded into the plant.

Stage 2 - Separation

- 3.12 The material passes through a magnetic separator to remove ferrous metal. The ferrous material is collected in a storage bay. After the magnetic separator, the IBA is fed into a trommel screen which separates the material into two size fractions: <32mm and >32mm fractions. The primary Screening Station includes air extraction with fabric filtration.
- 3.13 The >32mm fraction then passes through a second magnetic separator to remove additional ferrous metal followed by an eddy current separator for the removal of non-ferrous metal. The >32mm fraction is stored separately for further processing (crushing) before being fed back into the start of the process.

- 3.14 The <32mm material is fed into a 'flip flow' screen deck which provides a three-way split of the material. The <4mm fraction passes through the screen and is conveyed to the phase two plant for further metal recovery and then conveyed to the stocking area as a finished product. The 4mm to 12mm and 12mm to 32mm fractions is subjected to further separate processing through an eddy current separator and further magnetic processing to remove the remaining ferrous and non-ferrous metals. The resultant products are then conveyed to the aggregate storage bays as finished product.
- 3.15 Further detail on how the IBA is processed can be found in Method Statement for Processing and Flow diagram of IBA, which includes schematic flow process diagrams. This will vary when the facility is constructed and refined. All storage of raw IBA and its subsequent processing will take place within a covered environment. The final blending process includes the use of non waste aggregate.
- 3.16 The IBAA is subject to further testing in accordance with Day Group Ltd Integrated Management System, to indicate its compliance with EN13242. This testing is for the physical properties of the final aggregate following processing.
- 3.17 The facility also includes the potential to install a Hydraulically Bound Mixtures plant, but at this stage this will not be operational and the EMS will be updated as necessary if this changes.

Fuel and other Raw Material Delivery, Handling and Storage

- 3.18 Apart from the raw IBA, the main deliveries to the facility will comprise diesel fuel for the refuelling of mobile plant on Site. This is delivered by road and decanted into a double skinned, banded storage tank. A member of staff is responsible for ensuring that the fuel is decanted into the appropriate storage tank and that there is sufficient capacity within the tank prior to commencing filling operations. During a delivery of fuel, displaced air is vented back to the delivery vehicle.
- 3.19 All filling points, vents, gauges and sight glasses are located within the bund. Any pipework is located within the bund also, providing protection against incidental damage. In line with the current Oil Storage Regulations for Businesses, all filling points and tank overflow pipe outlets are arranged so any fuel coming out of them will go vertically down into the bund.
- 3.20 Oils and greases required for maintenance activities are delivered by road in small drums and containers. These are offloaded into the designated storage area, which is equipped with impermeable concrete hardstanding and drip trays and bunds where appropriate. The storage

capacity of bunds is greater than 110% of the largest container, or 25% of the total quantity stored, whichever is largest. All deliveries are supervised by a trained operative.

- 3.21 Due to the nature of the proposed activities, no other waste materials are expected to be delivered to Site.

Outgoing Waste / Recyclable By-products

- 3.22 The end products of IBA processing are:

- IBAA;
- Ferrous metals;
- Non-ferrous metals;
- IBA rejects.

- 3.23 All products will have designated storage areas which will have impermeable concrete surfacing.

Processed IBAA

- 3.24 The IBAA is stored in two separate areas depending on its size: one for fine aggregates; and the second for coarse aggregate. The product is blended on site with the imported aggregate using a loading shovel, according to customers' requirements, and loaded directly onto a lorry for off-site delivery. This takes place in the storage bays on the Site. These bays are used for additional storage of IBAA.

Ferrous and Non-Ferrous Metals

- 3.25 The metal fraction that is separated during the IBA recovery process is stored in bags or bays from where they are transferred directly into the market or to metal re-processors, as required.
- 3.26 It is anticipated that the ferrous and non-ferrous metals will comprise approximately 5% and 3%, respectively of the total tonnage of IBA delivered.

4 Management of Operations

4.1 The Site is run by technically competent management with a Certificate of Technical Competence (COTC) to Level 4 – Treatment / Transfer of Non-Hazardous Waste. A copy of this Management System, the Environmental Permit and COTC certification is kept available on Site, in digital format, for reference.

Daily Site Inspection

4.2 Upon arriving at Site at the start of each day, the staff will inspect the Site to ensure that there have been no incidents overnight. The inspection checks the entire Site infrastructure is intact and free from any obstructions covering the access, fencing, gates and drainage provisions. Any waste storage areas are checked to ensure that the material has not been disturbed. The mobile plant and monitoring equipment is also checked to ensure it is fully operational.

4.3 Any defects identified by the initial Site inspection is appropriately rectified by the Site staff immediately. Where it is not possible to rectify any defects immediately, the Site will not open unless operations can take place without any increased risk of pollution. The Site Manager will make this decision and record details of the incident, detailing its cause(s) and any remedial measures employed in the Site Diary/Log. Senior management will also be informed of the incident.

4.4 Upon completion of the daily initial Site inspection confirming normal operating conditions, with the completion of any necessary remedial actions, the Site will accept waste.

4.5 On arrival at Site, vehicles are checked in accordance with the procedures in Section 3 and directed over the weighbridge. Vehicles are then directed to the IBA storage building where they will unload.

4.6 If there is any spillage of materials outside of the designated areas, it is cleared as soon as feasible. An excavator / hydraulic loading shovel, bobcat or similar, is used to move the waste.

4.7 At the end of each working day, Site staff will ensure that all mobile plant and infrastructure is secured, the site is left in a tidy condition and the Site gates are locked and left secure. The proposals include 24hr loading/unloading and distribution if required.

5 Environmental Control Measures

Dust

- 5.1 A Dust Management Plan is appended to this EMS.

Pests & Vermin

- 5.2 Problems arising from pests and vermin are highly unlikely as food and other putrescible wastes will not be accepted at the Site. The Site Manager inspects the Site regularly (at least on a weekly basis) and, should any evidence of pests be found, steps are taken immediately to eradicate them. A record of inspection is kept in the Site Diary/Log.

Noise & Vibration

- 5.3 A Noise Management Plan is appended to this EMS.

Odour

- 5.4 Neither IBA nor IBAA has any appreciable odour. Due to the nature of the waste, odour nuisance is considered to be a low risk. This has been established at other IBA treatment facilities. However in order to address any issues which do arise odour control units are included in the IBA storage building which can be activated to work with the dust spray system. A neutralising liquid spray is added to the water spray.
- 5.5 Any isolated waste material found to be malodorous on inspection will be removed by re-loading the waste in to the delivery vehicle or loading into a sealable container.
- 5.6 Any complaint received will be detailed in the Site Diary. The Site Manager will investigate the complaint and will take action to identify the source of the odour and implement remedial measures, where appropriate.

Litter

- 5.7 The overall risk presented by the escape of litter from the facility is negligible due to the type of waste being handled. Site staff maintain a visual assessment throughout the working day for windblown litter, both inside and outside the facility. Any windblown material is cleared immediately, including any windblown litter off site. In this instance, a record of the event and the actions taken is recorded in the Site Diary/Log.

- 5.8 Any spillage of materials on the highway is dealt with by sweeping the surface with a mechanical sweeper unit and / or litter picking, if required. Details of any spills outside the Site or on the highway, and actions taken, are recorded in the Site Diary/Log.

Mud and Debris

- 5.9 In order to prevent the deposition or tracking of mud or debris from the facility onto public areas and highways, the following measures is put in place:

- Surfaces within transitional areas are maintained free of significant quantities of debris;
- All operational areas are subject to monitoring by staff throughout the working day to identify accumulations of mud requiring remedial action;
- Where necessary, road cleaning equipment is deployed to prevent the tracking of debris onto the highway;
- All vehicles leaving operational areas are, before leaving the facility, cleaned as necessary and checked to ensure that they are clear of loose waste and that any products being exported from the facility are secure; and
- All lorries are sheeted when loads are being carried to and from the facility. Any non-Company vehicle which repeats a non-sheeting offence is refused access to the Site.

- 5.10 In the event that debris or waste arising from the facility is deposited onto public areas outside the facility, the following remedial measures are implemented:

- The affected public areas outside the facility are cleaned; and
- Traffic is isolated from sources of mud and debris within the facility to prevent further tracking of mud and debris, and measures taken to clear any such sources as soon as practicable.

Gas Build up in IBA Storage

- 5.11 No unacceptable level of risk has been identified and any gases which do arise are dispersed by the design of the building. Annual testing is continued if the results indicate that gases exceed acceptable levels.

Water Health

- 5.12 Water on site is reused and re-circulated where feasible for dust suppression. The water is collected, settled and re-circulated. It is not used in any process and is not heated. The conditions of the system are not conducive to legionella or similar water borne diseases being developed. Odour has not been experienced, here nor at similar re-circulation systems where the water is not contained for extended periods.

Flood Risk

- 5.13 The site is located within Flood Zone 1 having a low probability of flooding, as indicated by UK Government mapping. As such is at a very low risk of flooding. It is the Manager's responsibility to respond to the risk of flooding and to record events and actions taken in the Site Diary/ Log. Actions may include temporarily ceasing accepting wastes, ceasing movements of wastes and materials around the site, shutting down treatment plant and evacuating staff.

6 Contingency Provisions

- 6.1 The Site will be shut down if Site conditions prevent normal working methods, such as risk of pollution or emergency situations, until normal working conditions can be resumed. Such conditions include critical failure of infrastructure e.g., failure of the drainage system; extreme weather conditions; or emergency situations such as outbreak of fire. The management plans that form part of this EMS set out the specific actions for events relating to potential emissions.
- 6.2 Site Management is informed immediately of any such incidents and, where appropriate, no further waste is accepted until normal operating conditions have resumed. If the Site is to be closed for more than two weeks, the Environment Agency is informed.

Mobile Plant & Machinery Failure

- 6.3 In the event of a breakdown or malfunction, machinery and plant are repaired and subject to a full inspection prior to commencing operation again. Spares for all consumable parts can be sourced with minimum delay. Should plant or machinery failure cause a pollution risk or emergency situation then that part of the Site and any affected area is isolated and operations ceased until the situation has been assessed by the Site Manager and deemed safe. Details of any such occurrence and necessary remedial actions is recorded in the Site Diary/Log.

Investigation of Incidents

- 6.4 Any incident or shutdown is investigated by the Site Manager to establish the reasons and, where possible, instigate measures to prevent repeat occurrences. Where there is a repeated incident / failure of a piece of plant or machinery the Site Manager shall investigate the causes, and take appropriate steps to address this including amendments to this EMS, if required.
- 6.5 A full record of the incident / shutdown is recorded in the Site Diary/Log including details of investigations and any resulting remedial actions. Details of any relevant incidents shall be forwarded to local Environment Agency officer, as appropriate.

7 Emergency Procedures

7.1 It is Day Group's intention to conduct operations at the Site in a manner that safeguards the Health & Safety of Site personnel and of all other persons; protects the environment from any risk of pollution; and minimises any adverse effects on the local amenity. Consequently, this management system is strictly adhered to, as well all other relevant statutory waste management requirements, as they apply to Site operations.

Immediate Response

7.2 Where appropriate to an incident, the immediate actions shall include:

- Raising the alarm if human health or safety is at risk.
- Contacting Emergency Services.
- Contacting the Environment Agency in the case of an environmental incident.

Secondary Actions

7.3 The appropriate procedures will depend on the nature of the incident and the potential events / failures that could lead to an environmental incident and their possible consequences together with the secondary actions to be taken to deal with the incident are outlined in Sections 9 and 10.

Reporting

7.4 All incidents on Site, bar minor incidental issues, are immediately reported to Site management. Full details of any incident which causes, or could cause, damage to human health and / or the environment are recorded in the Site Diary/Log. This includes:

- Date and time of incident.
- Nature of incident.
- Involvement of any third parties.
- Any remediation measures taken and results of investigation.

Investigation of Incidents

7.5 The incident / shutdown is investigated by management to establish the reason(s) for the incident and review the appropriateness of the actions taken. The investigation will, where possible, instigate measures to prevent repeat incidents.

Likelihood of Unmitigated Risks

- 7.6 Given the nature of the operations and the mitigation and response measures that are in place at the Site, the likelihood of an incident occurring that would impact the environment is low. Throughout this EMS, measures are outlined to deal with any potential environmental impact that may occur as a result of the Site activities.

Management

- 7.7 This Management System, including all procedures herein, is reviewed by Senior Management on an annual basis and any update deemed necessary noted.

8 Environmental Accidents – Water & Land

8.1 Although the likelihood of occurrence is deemed low, potential incidents that could lead to pollution to water or land include:

- Receipt of potentially polluting non-permitted waste.
- Failure / vandalism of plant leading to the release of oil / fuel / leachate.
- Leaking fuel and / or leachate tanks.

8.2 The potential consequences of these incidents could cause pollution of:

- Nearby water courses/dock.
- Surrounding land.
- Groundwater.

8.3 Appropriate mitigation measures are implemented to prevent incidents occurring, for example, fitting fuel tanks with level gauges to prevent overfilling and locks to prevent vandalism.

8.4 However, in the event that an incident does occur, the following actions is instigated by the Site staff as appropriate to the incident, as outlined in paragraph 7.2 above:

- Isolate areas from further operations, or if that is not possible, prevent further material being brought to Site, until normal operation conditions resume.
- Stem or contain flow of any potentially polluting liquid using sandbags, loose sand or proprietary absorbent.
- Use spill kit.
- Remove contaminated surfacing and dispose of appropriately.
- Remove the potentially polluting material to a sealed container (skip, for example) for off-site disposal.
- Inform management.

8.5 The incident shall be fully recorded as outlined in paragraph 7.4 and, if appropriate, the incident is reported to the Environment Agency.

Loss of Containment

8.6 Loss of containment can lead to spillage and leakage of potentially contaminating liquids. To prevent loss of containment and minimise the risk and impact of releases, the following measures are implemented:

- Containment system – tanks containing potentially polluting liquids is constructed so that any leaks / spills is contained. All tanks are bunded so that the bund is capable of containing at least 110% of the volume of the tank.
- Fuel tanks are fitted with level gauges to prevent overfilling and locks to prevent vandalism.
- Storage vessels – storage tanks are constructed to the appropriate British Standard.
- Inspection – tanks are inspected visually on a daily basis by Site staff to ensure the continued integrity of the tanks, and to identify the requirement for any remedial action.
- Spill kits – materials suitable for absorbing and containing minor spills are maintained on Site.

9 Environmental Accidents – Fire

9.1 No fires are permitted on Site however it is possible that a fire could break out on Site having been started inadvertently or deliberately (through an act of vandalism).

9.2 The potential consequences of such an incident could see pollution from:

- Fire-fighting water run-off from Site.
- Fire spreading to adjacent land.

9.3 In response to a fire, the following actions will be instigated by the Site staff as appropriate to the incident:

- Ensure all persons on Site are evacuated from danger area.
- Extinguish fire, if safe to do so.
- Call Emergency Services.
- Activate dust suppression system.
- Do not allow others to enter the area until the fire is fully extinguished.
- If possible, take actions as outlined in paragraph 8.4 for water.
- No further material brought to Site until normal operating conditions resumed.
- After the fire is extinguished, all fire damaged materials will be removed for suitable off-site disposal.
- Inform Management.

9.4 The incident will be fully recorded as outlined in paragraph 7.4 and the incident reported to the Environment Agency.

9.5 Site staff are suitably trained in fire-fighting procedures.

9.6 To prevent and minimise the potential impact of fire, the following action is taken:

- A bi-annual fire risk assessment is undertaken.
- Incompatible materials are stored apart.
- The plant inspection schedules include checks of electrical equipment within the facility to ensure that any faults are identified and repaired.
- Fire extinguishers are provided at designated locations around the Site.
- Smoking will not be permitted on-site.
- Staff are trained in the assessment of fire hazards and fire prevention.

-
- No wastes are burned at the facility and any fire at the facility is treated as an emergency.

10 Communication, Record Keeping and Document Control

10.1 Senior Management ensure that this EMS, and any updates or reviews, are communicated to all staff and contractors involved in the operation of the Site. The Site Manager ensures a full and up to date copy of the Management System, Environmental Permit and Planning Permission is kept in the Site office at all times, available for reference.

Site Diary/Log

10.2 The Site Diary/Log is a series of documents maintained by Site staff and Management, recording:

- Site opening times.
- Daily weather conditions.
- Incidents / abnormal site conditions.
- Refused loads / unacceptable wastes and action taken.
- Details of regular daily and weekly Site inspections, including any consequent actions.
- Details of regulatory inspections, with the outcome of any actions required.
- Plant breakdown / failure.
- Any incidents (human or environmental) that occur and actions taken.
- Site closures.
- Complaints and actions taken.

10.3 The Site Diary/Log is available for inspection to authorised Environment Agency officers.

Other Record Keeping

10.4 In addition to the Site Diary/Log, Site staff also keep records of:

- All waste transfer notes of the waste accepted and associated details of the delivery.
- Details of mobile plant maintenance.
- Records of staff training and review of training requirements.
- Environment Agency Compliance Assessment Reports.

10.5 All incidents and near misses are also logged within the Company “Power App”, a digital recording system whereby any staff member can make an entry.

10.6 All records associated with the Site shall be kept in accordance with Permit requirements and the Company’s Document Retention Procedures.

Document Control

10.7 In line with Company procedure, all documents are issued, revised and maintained in a consistent fashion. The documents that are included within the scope of document control are as follows:

- Policies and procedures.
- Responsibilities.
- Targets.
- Maintenance records.
- Monitoring records.
- Results of audits.
- Results of reviews.
- Complaints and incident records.
- Training records.

Complaints

10.8 Any complaint received at the Site is immediately investigated by the Site Manager and, where appropriate, remedial action taken. The complaint is reported to the Directors within 24 hours of its receipt. The complainant is informed of the outcome of the investigation of the complaint and any actions taken within 5 working days. Details of the complaint, including the complainant's details and actions taken and outcome, is recorded in the Site Diary/Log. Further details are in the relevant management plans appended.

Management, Site Staff and Training

Management

10.9 The Managing Director will have ultimate responsibility for all legislative requirements.

10.10 Day Group Ltd will audit site performance against the current Management System on an annual basis. The Management System itself is reviewed on an annual basis, or if there are any procedural changes, changes in equipment, variations in the permit, or after any incident, complaint or breach of the permit. Review will not necessarily result in changes or updates.

Site Management

10.11 Direct responsibility for implementing the Management System is held by the Technically Competent Management who will also be responsible for interim audits of the Management

System in response to changes to the Site's operation, company changes, incidents / incidents, complaints, and use of new plant or techniques.

Operational Staff

10.12 All Site staff receive a Site induction when they commence on Site. All Site staff involved in the operations will receive training appropriate to their role, with refresher training carried out annually. Additional training requirements are reviewed annually, or if there are any procedural changes or changes in plant.

Training

10.13 Management ensure that the Technical Competency is maintained in accordance with industry requirements. Suitably qualified consultancy staff will be brought in to manage the Site if this is not the case.

10.14 The Site staff are suitably trained in their roles and responsibilities with on-site training by the Technically Competent Management, to ensure that they conduct their duties in compliance with the Management System.

10.15 An assessment of the training needs is carried out to identify the posts for which specific environmental awareness training is needed, and the scope and level of such training. The assessment of training needs is reviewed on an annual basis.

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

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

10.17 Management will periodically review the Company's environmental policy and objectives.

11 Reporting Non-Compliance and Taking Corrective Action

11.1 The Company procedures in place ensure corrective action is taken in response to problems identified at the Facility. The procedures ensure that non-conformances are reported, investigated and rectified, and that incidents and near-misses are prevented. The following aspects are considered:

- Actual or potential non-compliance.
- System failure discovered at internal audit.
- Suppliers or subcontractors breaking the agreed operating rules.
- Incidents, incidents and emergencies.
- Malfunction, breakdown or failure of plant.
- Complaints.

11.2 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 testing alternative solutions.
- Modifying procedures and responsibilities.
- Seeking approval for additional resources and training.
- Contacting suppliers and contractors.

11.3 A formal internal auditing procedure will ensure the facility is audited annually and that the progress of corrective and preventive action is monitored by the Production Director.

11.4 Senior management will review environmental performance and ensure any necessary actions are taken.