Pure Data Centre – Permit Variation

784-B047734

Environmental Management System Summary

Environmental Permit Application

PDCG (GROUP SERVICES LIMITED)

July 2024

Document prepared on behalf of Tetra Tech Limited. Registered in England numbe 01959704



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1.0 Site Operations and Infrastructure

1.1 Site Operations

- 1.1.1 The management system will comprise documented procedures for all site operations in relation to start up, normal operation and shut down. These procedures will also provide details of what measures will be undertaken in order to prevent or minimise the environmental risk from site operations.
- 1.1.2 All operational procedures will be reviewed on an annual basis as part of the management system (Section 5) and under the following circumstances: -
 - After any accident, complaint, or breach of the Environmental Permit; and,
 - Changes to site operations.

1.2 Site Equipment and Maintenance Plan

- 1.2.1 A Planned Preventative Maintenance programme (PPM) will be incorporated into the site's management system to minimise the risk to safety, health, and the environment by ensuring that all appropriate items and elements within the site are served and inspected on a regular basis or to the manufacturer's maintenance schedules.
- 1.2.2 Details of faults, breakdowns and repairs will be documents and records will be maintained by the operator. Faults and breakdowns will be investigated, and the service schedule will be revised if necessary.

1.3 Contingency Plans

1.3.1 All operational procedures will comprise contingency plans which details what actions will be undertaken in the event of any breakdown, enforced shutdowns and any changes to normal operations (e.g., flooding, or extreme weather). This will ensure that the necessary measures are employed to minimise the environmental risks arising from abnormal operating conditions.

2.0 Accident Prevention and Management Plan

- 2.0.1 The Accident Prevention and Management Plan will identify potential accidents that could arise from the site's operations, and the environmental consequences of those accidents. It will also provide details on how the operator will reduce the likelihood of accidents and indicates how the operator will respond should any such events occur.
 - 2.0.2 The Accident Prevention and Management Plan will be reviewed on an annual basis and under the following circumstances: -
 - After any accident or complaint;
 - Changes to site operations that may affect the likelihood of accidents; and,
 - Changes to emergency contacts.

2.1 Contract Information for The Public

- 2.1.1 Given that the proposed facility comprises a waste operation, a notice board will be situated at the site entrance which will include the following information: -
 - The permit holder's name;
 - An 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 0800 807060.

2.2 Complaints Procedure

- 2.2.1 A complaints procedure will be incorporated into the site's management system to ensure that complaints will be handled by the operator to reassure the Environment Agency and the public that any of their concerns will be acknowledged and acted upon where appropriate. The procedure will be reviewed on an annual basis as part of the management system review (Section 5) or in the event of any significant complaints.
- 2.2.2 As mentioned in Section 2.1, a notice board will be situated at the site entrance which details the operator's and the Environment Agency's contact details. This will ensure that any member of the public can report their complaint and be confident that it will be received by the appropriate party even if they do not wish to discuss their complaint directly with the operator.
- 2.2.3 Any complaint that is received by the operator will be investigated in order to identify the cause of the complaint. Once established, necessary actions will be undertaken to prevent re-occurrence.

2.2.4 The operator will maintain a record of all complaints, how the complaint was investigated and any actions that were undertaken as a result of the complaint.



3.0 Managing Staff Competence and Training Records

- 3.0.1 To ensure that the site is operated by personnel who are suitably trained, the operator will maintain a record which identifies each job role and the training requirements for each role. This will be monitored against a training checklist which will identify whether each member of staff has received the required training to undertake their role on site.
- 3.0.2 The operator will also maintain a record of all training, experience and qualifications of staff and kept will be kept up to date.
- 3.0.3 The training requirements and training checklist for all personnel will be reviewed on annual basis as part of the management system review (Section 5) and in the event of any significant alterations to the site operations or procedures.

4.0 Keeping Records

- 4.0.1 The operator will maintain a record of documents containing information regarding the operation of the site. This will include the following: -
 - Environmental permits and variation notices issued to the site;
 - Legal requirements;
 - Risk assessment for site operations;
 - Any plans that are required by the Environmental Permit;
 - Operating procedures;
 - Staff competence and training;
 - Compliance checks, findings of investigation and actions taken;
 - Complaints made, findings of investigation and actions taken;
 - Audits of management system, findings and actions taken; and,
 - Management reviews and changes made to the management system.
- 4.0.2 These documents will be kept in a convenient location on site, allowing access for any person that may be working or visiting the site.

4.1 Waste Records

- 4.1.1 The operator will keep a record that details all wastes that are accepted at the site. This will include the following details: -
 - The quantity of waste to be imported;
 - The List of Wastes (England) Regulations 2005 code;
 - Original source of the waste;
 - The identity of the waste producer;
 - The date the waste arrives on site;
 - Any non-compliant materials that were received on site and what was done to the material; and,
 - Results of basic waste characterisation, compliance testing or on-site verification.
- 4.1.2 The information listed above will be provided to the Environment Agency at three-monthly intervals, within one months of the end of each period.

5.0 Review of Management System

5.1 **Document Review Procedures**

- 5.1.1 The management system will be reviewed on an annual basis to ensure compliance with the relevant guidance and regulations. The management system will also be reviewed under the following circumstances: -
 - After any accident, complaint or breach of the Environmental Permit;
 - Changes to the site or operations that will require the Environmental Permit to be varied (changed); and,
 - If a new environmental problem or issue is encountered on site and a new control measure has been implemented.
- 5.1.2 The operator will maintain a record of any changes to the management system.



6.0 Site Closure

- 6.0.1 In accordance with the EA's "Develop a management system: environmental permits" Guidance, due to the nature of the site, a site closure period is not required.
- 6.0.2 In order to surrender the environmental permit in the future, a site condition report will be submitted in accordance with the Environment Agency's H5 SCR template and incorporate the site closure portions of the document.
- 6.0.3 As such no further monitoring or post closure monitoring is deemed necessary and therefore no further closure and aftercare plan has been prepared in support of this Environmental Permit Application.

