

Depot Environmental Management Plan (DEMP)

Drayton Depot

Drayton Highways Depot, Milton Road, Oxfordshire, OX14 4EZ

Revision Control Schedule

Rev.	Date	Description	Prepared By	Checked By	Approved By
01	Apr 25	First version	ER	NT	PMR
File Location:		Sharepoint			

Table of Contents

1. Depot Environment Management Plan Scope	4
2. General Information	4
3. Site Contact Information	5
4. Roles and Responsibilities	6
5. Monitoring, Maintenance and Measurement	8
6. Emergency Response	9
7. Stores.....	10
8. Site Environmental Information and Requirements	12
9. Third Party Activities.....	27
10. Management Review.....	29
Appendix A: Site Location.....	30
Appendix B: Depot Layout Map	33
Appendix C: Site Drainage Map.....	35
Appendix D: Depot Utilities Plan	36
Appendix E: TCM WAMITAB certificate (Oliver Beech) and contingency TCM WAMITAB Certificate (Luke Bridges).....	37
Appendix F: Environmental Permit Site Layout Plan.....	40
Appendix G: Annual Performance Reporting Templates	41
Appendix H: Annual Performance Parameters – Water Usage.....	42
Appendix I: Depot Permits, Exemptions and Consents	43
Appendix J: Depot Permits, Exemptions and Consents	44
Appendix K: Notification in the event of a Pollution Incident.....	48
Appendix L: Environmental Incident Process	49
Appendix M: Third Party Waste Activity Agreement Letter	50
Appendix N: Wet Waste Bay Construction Drawings.....	51

Named Holder Details of the DEMP

Name: Phil Raven

Position: Operations Manager

(Non-controlled copies of the management plan will be issued to M Group's on-site management team and suppliers).

Abbreviations

COSHH	Control of Substances Hazardous to Health
CSC	Central Service Control
DEMP	Depot Environmental Management Plan
EMS	Environmental Management System
H&S	Health and Safety
HWCN	Hazardous Waste Consignment Note
OCC	Oxfordshire County Council
SEATS	Site Environmental Awareness Training Scheme
TBT	Toolbox Talks
WTN	Waste Transfer Note
HWCN	Hazardous Waste Consignment Note

Useful links

Procore
MiGroup Highways Management System (MIMS)
MIL STD MIN 001 Milestone HSW Minimum Standards.pdf
Highways Risk Assessments
Oxfordshire County Council (OCC) Partnership Integrated Management System (IMS)

1. Depot Environment Management Plan Scope

Staff at this depot are required to work in a manner that reduces the negative environmental impact of highways maintenance in accordance with business policies. To achieve this the site team, subcontractors and all suppliers will comply with the contents of this Depot Environmental Management Plan (DEMP). This DEMP details the environmental risks associated with activities and the management controls required to minimise the impact of highways maintenance activities on the environment.

The objectives of this DEMP are:

- To minimise adverse effects on the environment within and surrounding this depot,
- To promote good standards of environmental awareness amongst staff and site users,
- To develop environmental awareness and responsibilities amongst site personnel at all levels,
- To prevent nuisance to the community,
- To implement a policy of reuse of all waste with disposal off-depot being a last resort,
- Establish a system of environmental monitoring, inspection and audit to ensure that full compliance with all relevant legislation and environmental licences is maintained,
- Develop environmental awareness and competence within the depot staff.

This DEMP provides a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances, closure and those drawn to the attention of the operator as a result of complaints, as per condition 1.1 of the current waste installation permit in place at the depot (EPR/QP3899ED).

2. General Information

2.1 Staff, Welfare and Operating Hours

General working hours are between 07:00 and 16:30, however the depot may be operated 24 hours a day during Winter Service Operations and construction operations. Standby crews are called out as required to cover the weekend, early mornings and evenings.

On occasions depot staff will be required to work during weekends and public holidays. This is covered in the Generic Environmental Risk Assessment for Depot Operations.

Staff Information

This depot currently employs 60 operational staff and 40 office staff.

Welfare Facilities

There are 3 kitchen areas, one in the main office staff office area, 1 in the operative's mess area and 1 in the remote meeting room area. There are toilets (ladies and gents) in the mail office staff area and outside, adjacent to the operative's mess area.

2.2 Site Security

The security of a site is important, not only for the protection of the environment, but to prevent unauthorised access and fly tipping.

The depot has a chain-link perimeter fence that is approximately two metres in height topped with three strands of barbed wire. Access to the site is by road from Milton Road. The gates to the depot are locked at approximately 17:00 every day. Staff on-call for gritting and emergency works have a key to access the depot as and when needed.

Out of hours, during holiday or non-working periods only permitted key holders will be able to grant access to the depot. Access controls are managed by the Area Manager / Senior Supervisor. The last person out of the yard must ensure that the alarms are set, and all windows are closed and locked.

2.3 Environmental Training

All staff working within the depot will be given an induction which includes environmental information.

Toolbox talks (TBTs) on relevant environmental issues will be delivered on a regular basis to all site operatives and subcontractors regularly working within the depot.



M GROUP

Depot Supervisors / Site Agents are tasked with the objective of delivering toolbox talks on a monthly basis, or as required on site. Attendance at TBTs will be reported monthly by the Environmental Team via The Green Reporting Hub.

All Depot Supervisors and those responsible for completing waste documentation will attend METS Foundation which is organised by the Environmental Team.

Emergency spill response drills are held in the depot annually, undertaken by the Environmental Team / Supervisor / Site Agent and recorded using a briefing sheet. Attendance registers and Spill Drill Records are stored on Procore.

Important environmental information is displayed on the depot notice boards.

In relation to the depots Environmental Permit, the Technically Competent Manager holds a WAMITAB Level 4 qualification Managing Treatment of Hazardous Wastes. Their continuing competence is assessed every 2 years as part of the WAMITAB organisation.

The Environmental Team will ensure all new supervisory staff working within the depot will attend a METS Foundation session within three months of starting employment.

3. Site Contact Information

3.1 Office Information

This depot is owned by Oxfordshire County Council (OCC) and operated by M Group Highways as part of the Oxfordshire Highway Alliance. Refer to **Appendix A** for a site location map. **Appendix B** illustrates the depot layout and identifies key areas.

The Drayton Depot is located on Milton Road between the villages of Drayton and Sutton Courtenay within the Vale of White Horse District. The address of the depot is:

Highways Maintenance Depot, Milton Road, Drayton, Oxfordshire, OX14 4EZ

The site was first brought into use in the 1970's and has been developed ad hoc to its current state. The site covers approximately 2.2 hectares and consists of car parking, offices, vehicle maintenance workshop, stores, salt and waste storage and treatment, hot box for asphalt and refuelling facilities.

Description of the Surrounding Environment

The site is located on Milton Road and is bounded to the south by a small industrial estate, land to the west and east of the site is primarily used for agricultural activities.

The nearest residential properties to the site are located adjacent to the site boundary at the northern end of the site. The nearest residential properties to the south of the site are located approximately 200m from the site boundary.

Mill Brook (waterbody ID GB106039023660) is located approximately 450 metres to the south of the depot and is currently classified as 'Good Ecological Status' by the Environment Agency.

The nearest statutory designated area is Culham Brake Site of Special Scientific Interest (SSSI), which is approximately 3.15 kilometres to the northeast of the site.

The entirety of Drayton Depot is included within a protected drinking water area for surface waters. Raw water is extracted from Rivers and Reservoirs in this area; therefore such water needs to be protected to ensure that it is not polluted which could lead to additional purification treatment. The site has a surface water discharge consent for water from roads, car parks and other surfaces which is discharged from the site via an oil interceptor.

3.2 Brief Description of Works

This depot is one of the main bases for highway operations within Oxfordshire. Activities operated from this location include those covered by the Generic Risk Assessments listed in **Table 3.2** below. Note, these activities and associated environmental controls are not covered within the scope of this DEMP. They are instead covered by an Environmental Risk Assessment.

Table 3.2 Generic Risk Assessments

Reference	Generic Risk Assessment
-----------	-------------------------

MIL_RA_HS_001	Risk Affecting All Highways Work
MIL_RA_HS_002	Depot Operations
MIL_RA_HS_003	Emergency Response
MIL_RA_HS_004	Safety Defects
MIL_RA_HS_005	Winter Maintenance
MIL_RA_HS_006	Sign Works
MIL_RA_HS_007	Patching
MIL_RA_HS_008	Footway Construction
MIL_RA_HS_009	Drainage Works
MIL_RA_HS_010	Gully Emptying and Jetting
MIL_RA_HS_011	Dragon Patcher
MIL_RA_HS_012	Overbanding and Thermoplastic lining
MIL_RA_HS_013	Grips and Ditches
MIL_RA_HS_014	Grass Cutting Hedge Cutting
MIL_RA_HS_015	Verge Ploughing and Siding
MIL_RA_HS_016	Network Inspections
MIL_RA_HS_017	Traffic Management – Site records
MIL_RA_HS_029	Road Sweeping
MIL_RA_HS_030	Gabion and Bagwork Walling
MIL_RA_HS_031	Parish Stewards

This depot provides storage facilities for all of these operations. The potential environmental impacts of these operations, therefore, mainly result from storage of materials. Consequently, the depot activities that could give rise to potential environmental impacts have been categorised as follows:

- Refuelling areas for storage of fuel for plant vehicles and decanting fuels and oils for disposal
- Wash down areas for cleaning fleet, plant, tools and machinery
- Storage of plant and machinery when not in use
- Storage and treatment of waste
- Storage of chemicals and materials, including salt storage and hot box usage
- Energy consumption and water consumption
- Maintenance and improvement work within the depot

All works at this depot are undertaken in accordance with our local processes and environment control procedures as indicated in **Table 3.2** above.

3.3 Winter Service Operations

A key work activity for this contract is Winter Service Operations, which involves reducing the risk of ice on the highway by gritting the roads with salt. The winter maintenance season operates between November and April. Due to the nature of this activity, operational staff may be required to work 24/7 dependant on weather conditions. Winter maintenance activities are operated from this location.

Salt is stored in an area which drains to the foul sewerage system. Water run-off from salt is not allowed to enter the surface water drainage within the depot. All winter service activities using salt have the potential to create small stockpiles, run off and residues with vehicle wash downs. For this reason, any salt remaining at the end of daily operations will be removed.

4. Roles and Responsibilities

In addition to the roles and responsibilities established by the contract EMP, roles and responsibilities specific to this location are set out below:

4.1 Staff

Table 4.1 Depot Roles and Responsibilities

Role	Key Responsibilities	Contact
Business Director / Operations Manager	- Ensuring that site specific training needs are identified, and training programmes are effectively undertaken. - Reviewing and monitoring the Company's performance against agreed targets. - Ensuring adequate resource / funding for depot compliance with permit and other legislative requirements. - Communicating and escalating compliance issues / risks to the client as and when informed by the Environment Team	Richard Lovewell 07949 898348 Phil Raven 07803 260115
Area Manager / Senior Supervisor	- Ensuring all site licences, consents and authorisations are adhered to on site, - Ensuring that the conditions of the Environmental Permit and waste exemptions are adhered to. - Ensuring company procedures for waste management, waste minimisation, sustainability and emergency preparedness and response are implemented on site, - Ensuring that site specific training needs are identified, and training programmes are effectively undertaken. - Ensuring that all incidents are reported and dealt with according to the Environmental Incident Plan (Appendix L) - Delivering inductions, training, toolbox talks as necessary to staff at the Site	Sean Farrell 07876 874412
Store-person	- Implementing control measures to ensure compliance with all site exemptions, consents and authorisations applicable to this site. - Ensuring that all incidents are reported and dealt with according to the Environmental Incident Plan (Appendix L) - Ensuring all waste movements are accurately documented using the appropriate Waste Transfer Note (WTN), - Facilitate the collection and storage of the WTNs. - Liaising with the cleaning contractor for the site - Ensuring any maintenance issues that have been reported are actioned	Martin Evans 07834 507250
Environmental Advisor	- Checking all site-specific licences and permits, and checking through regular monitoring that the conditions of such consents and permits are adhered to, - Where required, coordinating the appointment of specialist consultants for environmental matters, - Assisting in the implementation of the provisions of the DEMP in the Site	Euan Russell 07526 193574
All Employees (Including Staff and Subcontractors)	- Implement the requirement of the DEMP, - Monitor their workplace for potential threats to the environment and alert their supervisor or manager of any that are observed. - Report all incidents that occur on site to OPTIMUS.	All

4.2 Key Regulators, Contacts and Contact Details

Table 4.2 Key Regulatory Bodies

Contact	Location	Telephone Number
Environment Agency National Contacts	N/A	24 Hour Emergency: 0800 807 060 Floodline: 08459 881 188

Environment Agency Local Office	Red Kite House, Howbery Park, Benson Lane, Wallingford, Oxfordshire, OX10 8BD	Lisa Gibbon, Installations Officer: 02077141003 lisa.gibbon@environment-agency.gov.uk Tel: 03708 506506 Email: enquiries@environment-agency.gov.uk
Environmental Health	Vale of the White Horse District Council, 135 Eastern Avenue, Milton Park, Milton, OX14 4SB	Tim Williams Email: tim.williams@whitehorsedc.gov.uk Emergencies: 01235 422420
Local Water Authority	N/A	Trade Effluent Technologist (0203 577 9200) Email: wwqservicedesk@thameswater.co.uk Thames Water
Natural England	Natural England, County Hall, Spetchley Road, Worcester, WR5 2NP	General enquiry (Mon-Fri 8-5pm): 0845 600 3078 24 Hour emergency response: 0300 060 6000
Veolia	N/A	24 Hr Emergency spill clean-up: 08000 282821 (member no.: 225)
Police	N/A	Oxfordshire – Thames Valley Police Tel No: 101
Fire & Rescue Services	N/A	01865 842999

The Environmental Team is the key point of contact for these regulatory bodies and all communication should be directed through them. Visits, outcomes and discussions with regulatory bodies should be recorded and stored at: "P:\Highways\Oxfordshire\90.QSE\905 Environment\12 Waste Management\Drayton Depot Permit\EA Inspections"

4.3 Public Liaison

Members of the public can contact the depot team via Oxfordshire County Council's Highway Enquiries Team on 0845 310 11 11 (08:30-17:00 Mon-Thu, 08:30-16:00 Fri). Emergency contact information is displayed at the site entrance.

5. Monitoring, Maintenance and Measurement

5.1 Site Permits, Licences and Authorisations

This depot operates under the licences and authorisations detailed in **Appendix I**. A copy of each licence and associated conditions can be found on the Contract Sharepoint site. This list is reviewed in line with the contract consents register.

5.2 Maintenance

The Depot Supervisor shall undertake monthly environmental inspections to check for maintenance issues and depot conditions. All such inspections shall be recorded on Procore.

Site equipment will be maintained in line with the following frequencies:

Equipment	Maintenance Frequency	Responsibility
Depot Weighbridge	Annual	Area Manager
Drainage Interceptors	6 monthly maintenance/5 yearly integrity testing.	Area Manager
Diesel Fuel Pumps	Annual	Area Manager

Mobile Screening, crushing, batching and mixing plants are provided by the responsible subcontractor. Prior to plant arriving on site, maintenance records are inspected by the site agent / supervisor.

Maintenance records will be held in the Contract Sharepoint site. Any issues should be reported to the Environment Team.

Maintenance records are to include the following:

- Oil interceptor(s) and site drainage are serviced biannually, arranged by the Store-person, interceptor service records will be held in the Contract Sharepoint site.

- Site infrastructure including waste bays and material storage areas to be checked at least monthly and maintained as required, to be approved by the Operations Manager.

5.3 Site Audit and Inspection Schedule

Depot compliance and environmental performance at this site will be assessed, recorded and reported at regular intervals. Regular checks ensure that any issues are flagged at the earliest opportunity and corrective actions are taken where required. Corrective actions are uploaded to Procore, assigned to the relevant person and monitored by the Environment Team.

Weekly depot inspections will be undertaken by the Area Manager / Technically Competent Manager / Environment Team. The inspections will ensure that all that all control measures / conditions stated in the DEMP / Environmental Permit are being implemented within the depot.

Upon completion, the checklist will be input onto the Procore. The depot team are notified of any actions. The progress of these actions is recorded, and actions closed out within the stated timescale. The contract Quality Manager produces monthly updates of actions recorded within Procore and these are shared across the contract.

Site Agents / Supervisors and the Contract Transport Manager conduct monthly Environment, Health & Safety Inspections of vehicles, plant and depot facilities. These are also recorded on the Depot Inspection Checklist / Vehicle Inspection Checklist and the procedure above is followed.

The Environment Team will conduct quarterly inspections of the depot with the Quality Manager and Health, Safety & Wellbeing Advisor (where available). The results of these inspections will be reported to the Area Manager and recorded on ProCore. Any persons required to carry out corrective actions will be notified as soon as possible.

Any corrective actions recorded during a quarterly depot inspection must be closed out within the agreed time. If the deficiency persists or is a serious breach, then the Business Director shall be notified by the Area Manager.

5.4 Sampling and Analysis

Sampling and analysis at this location is completed in line with any applicable permits or consents or based on a risk-based approach.

This includes sampling the excavated waste stockpiles in the depot monthly. Copies of analysis and associated reports are to be stored in the Contract Sharepoint site.

6. Emergency Response

6.1 Incident Management

In the event of an environmental incident the Emergency Response Plan must be followed.

All staff will receive a briefing on the incident reporting procedure during the site induction. A Toolbox Talk on incident reporting is also issued to operational staff. All staff are required to report any issues and incidents on site to the CSC on 0800 028 0676 or email infrastructure submit to the Environmental Team who will upload the information will then be uploaded onto OPTIMUS.

Spill kit locations at this depot are illustrated in a spill kit map which is pinned up in reception and on the depot's Environment Noticeboard. Spill kits are to be situated in front of all refuelling areas and the Store-person is responsible for checking and maintaining stock levels. As a minimum each spill kit must be able to contain approximately 120 litres. Based on this each spill kits should contain:

- Absorbent pads, socks and pillows,
- Gloves
- Hazardous waste bags and ties,

Absorbent granules, 'dammit' putty and clay drainage covers should also be available

All works vehicles are subject to daily vehicle checks, which are logged in the vehicle defect books. In the event of an issue being found with a vehicle, piece of plant or machinery, the item will be removed from service with immediate effect to be repaired. If any spillages do occur, then prompt action will be taken to identify the

pollutant and its source and report to the CSC on 0800 028 0676. This will be actioned in adherence to the Emergency Response Plan.

All operational vehicles carry a mobile spill kit which should be able to contain approximately 25 litres. Based on this, each spill kit should contain the following as a minimum:

- 20 Absorbent pads
- 2 Socks
- 1 Pair of gloves
- 2 bags and ties

Additional support is available in the form of extra materials from stores or via specialist incident response contractors (Veolia).

Once any spillage has been contained the waste will be appropriately consigned and deposited at a site licensed to accept it. Any spillage or pollution that is causing or likely to have serious effect on the environment will be notified to the Environment Agency, via the Environmental Team, in accordance with the Emergency Response Plan.

6.2 Fire or Emergency

No fires are allowed on site. However, there is the possibility that a fire could occur either inadvertently or deliberately (through an act of vandalism) on site. The potential consequences of such an accident could see pollution with:

- Firefighting water runoff from site
- Fire spreading to adjacent land and properties
- Air Quality Issues

In response to an incident of fire, the following actions will be instigated by the Site Staff:

- Ensure all persons on site are evacuated from danger area
- Extinguish fire if safe to do so
- Do not allow others to enter the area till fire fully extinguished
- No further material is to be brought to site until normal operation conditions resumed
- After fire is extinguished remove all fire damaged materials for suitable disposal
- Inform Management Team as soon as possible

The incident shall be fully recorded and reported to the CSC, Contracts Manager, the Environment Agency and the Environment Team without delay.

7. Stores

7.1 Oils, Fuels and Lubricants

This depot stores, uses and disposes of oil, fuels and lubricants in the depot. All oils and lubricants are stored on spill trays capable of containing up to 25% of the total capacity in the event of an incident. All deliveries are supervised by either the Depot Site Agent or Storeman.

Fuel Tanks

A fuel tanks were last serviced on 14/10/2024 (covering both tanks). Copies can be requested from M Group Plant and Fleet and Services who arrange and manage servicing of the tanks.

Fuel Type	Capacity (Litres)	Bund or Secondary Containment	Location
White Diesel	38,800	Secondary Containment	Above Ground
HVO	15,000	Secondary Containment	Above Ground

Dragon Patchers

Dragon Patcher is a fully mobile Spray Injection Patcher fitted with a flame heating system. It consists of a truck mounted bitumen emulsion / hard aggregate storage and application system.

Two dragon patchers operate throughout the year from Drayton Depot. Drayton Depot has a material bay for the dragon patcher aggregate and a room in the workshop to store bitumen in IBCs at warm temperatures.

A technical review group has been established for the dragon patchers. This group has environmental input. The following documents have been developed by the group and are in place:

- Dragon Patcher joint HSE method statement and risk assessment
- Dragon Patcher depot pollution prevention checklist – to be completed every 6 months
- Emulsion handling method statement and risk assessment

7.2 Salt Storage

Salt Storage (Y/N)	Tonnes Stored	Method of Containment
Yes	5,500	Salt Barn

Salt is stored with protection from rain and water ingress. All winter maintenance activities using salt have the potential to create small stockpiles, run off and residues. For this reason, any drainage within 10 metres of operational activities should be covered and any remaining salt cleared immediately.

7.3 Materials Storage

All materials should be stored in a manner that protects harm to human health and the environment. Materials are to be stored correctly to prevent harm and cross contamination.

Stock materials such as prefabricated materials and aggregates should be kept to a minimum and ordered on a just in time basis to help minimise waste generated from the depot.

All chemicals or hazardous materials in the depot shall be correctly labelled, fit for purpose, protected against unauthorised use, and stored so as to prevent them being damaged or accidentally spilt. No chemicals listed on the restricted substances list are permitted for use without prior authorisation from the Environment Team.

The following vehicle cleaning products have been approved by Thames Water:

- [Citrosol cleaner](#) (diluted as per product label (1:50 parts water i.e. 20ml of Citrosol per 1 litre of water)

No other products (e.g., T99) should be used and washed off into the foul drainage until approval is received from Thames Water. If used, these products need to be wiped off the machine instead, providing it is safe to do so, and rags would need to be disposed as of hazardous waste (15 02 02*).

Oils and oil type substances are covered by The Control of Pollution (Oil Storage) (England) Regulations 2001 (refer to PPG01 Oil Storage Guidelines for further details). Ensure the following:

- The bund must be sufficient to contain 110% of the maximum contents of any oil container of 200 Litres or more.
- Where more than one container is stored, the bund should be capable of storing 110% of the largest tank or 25% of the total storage capacity, whichever is the greater.
- Tanks, drums or other containers must be strong enough to hold the oil without leaking or bursting.
- The oil container must be positioned away from any vehicle traffic to avoid damage from collision.
- A bund or drip tray must be provided to catch any oil leaking from the container or its ancillary pipework and equipment.
- The bund base and walls must be impermeable to water and oil and checked regularly for leaks.
- Any valve, filter, sight gauge, vent pipe or other ancillary equipment must be kept within the bund when not in use.
- All valves / hoses shall be turned off and securely locked when not in use
- An above ground oil store or filling location must not be located within 10 metres of a watercourse or 50 metres of a well or borehole.
- Drip trays must be used and spill kits and drain covers kept in close proximity
- Drip trays shall be protected to avoid any water entering them. If full of water, drip trays must be emptied and disposed of as hazardous waste. No contaminated water can at any circumstances enter any drains.

Hot Box

All hot boxes will be operated in line with the following control measures:

- A hot box requires large amounts of Propane Gas. For this reason, hot box "ON" time should only be when required and the temperature should be reduced when the hot box is not directly in use to maintain blacktop stock and prevent excessive gas usage.



M GROUP

- The hot box loading shovel should only be cleaned on areas that benefit from hard standing and sealed drainage systems.
- Diesel will NOT be used for cleaning of the loading shovel or any other tools and equipment, only alternative nontoxic products such as Bitukleen will be used.

Oil Storage

Oils and oil type substances are covered by The Control of Pollution (Oil Storage) Regulations (England) 2001 and [GPP02: Above ground oil storage tanks](#). The following pollution prevention methods will be in place when storing Fuels and Oils.

- Storage areas must have secondary containment, such as bunding or location within an impermeable, sealed storage room, so that spills and leaks are contained and their pollution risk is reduced.
- The bund will be sufficient to contain 110% of the maximum contents of any oil container of 200 Litres or more.
- All chemicals will be stored on a bund that is able to store 110% of the contents of the container.
- Where more than one container is stored, the bund should will be able to store 25% of the total storage capacity.
- Tanks, drums or other containers will be strong enough to hold the oil without leaking or bursting.
- The oil container will be positioned away from any vehicle traffic to avoid damage from collision.
- A bund or drip tray will be provided to catch any oil leaking from the container or its ancillary pipework and equipment.
- The bund base and walls must be impermeable to water and oil and checked regularly for leaks.
- Any valve, filter, sight gauge, vent pipe or other ancillary equipment will be kept on a bund / plant nappy when not in use.
- All valves / hoses will be turned off and securely locked when not in use.
- Drip trays / plant nappies will be provided for all plant and spill kits and drain covers kept nearby.
- Drip trays shall be protected to avoid any water entering them. If full of water, drip trays must be emptied and disposed of as hazardous waste. No contaminated water can at any circumstances enter any drains or be discharged to ground.

8. Site Environmental Information and Requirements

The Site Management Team with the assistance of the Environment Team shall be responsible for applying and implementing the control measures identified in the Depot Environmental Risks and Opportunities Register (**Appendix J**). Staff involved with operations at this depot will need to consider mitigation for the following environmental impacts:

8.1 Air Pollution and Dust

Dusty materials are not permitted on site. All materials, stockpiles and activities that have the potential to cause dust and air quality issues shall be suitably managed by either spraying with a fine mist of water to dampen (dust suppression) or covering with a suitable cover such as a tarpaulin.

Hard standing areas, depot yards and wash bays are to be kept clean and free of debris by regular sweeping and cleaning. All vehicles and plant are to be suitably maintained; emissions are required to comply with MOT emission standards. No fires are to be permitted on site.

- The nearest resident is adjacent to the depot's northern boundary and 200 metres from the depot's southern boundary.
- The nearest commercial property is adjacent to the southern depot boundary, in a small industrial estate.

Odour

No wastes that emit strong odours are permitted onto site at any time. Any waste that generates a strong odour whilst stored on the site will be removed as soon as possible.

8.2 Archaeology, Cultural Heritage and Listed Buildings

Archaeology and cultural heritage is assessed using the Inform mapping system. In relation to this depot the findings are as follows:

- There are 0 archaeological records within 300m.
- There are 0 Listed Buildings associated within the site visibility to the site.
- There are 0 Scheduled Monuments associated with or within visibility to the site.

8.3 Contaminated Land

During the construction phase on the depot improvements projects, excavated soil was found to contain elevated levels of TPH's. Therefore prior to removal of any excavated material from site, sampling and testing will be conducted to accurately classify the waste.

8.4 Ecology, Wildlife and Biodiversity

Within the depot there is potential for the following protected species: breeding birds within surrounding hedgerows, trees and inside outbuildings and bats in storage sheds and outbuildings. Any works to buildings or works that involve lighting adjustments must not be undertaken without prior consultation with the Environment Team.

If a bird or bat nest is found, urgent care should be taken not to disturb it, including stopping works if necessary to ensure it is not disturbed, and the Environment Team should be notified the same day.

There are numerous active badger setts in the embankment along Milton Road, staff have been made aware of this through Toolbox Talks and other educational programmes. Site staff should remain vigilant for possible signs of badgers within the depot and if sightings are made these should be reported to the Area Manager &/or Environment Team.

Waste containing invasive or injurious plant species is not permitted into the depot.

Removal of vegetation (especially that which performs a screening function) is not to be permitted without prior consultation with the Environment Team.

Operational staff should prevent importing waste containing invasive plant species into the depot. Awareness and training is achieved via toolbox talks.

Pest Control is in operation around the depot. These are maintained regularly by the OCC designated department. Any incidents involving pests should be reported to the CSC and the Environment Team / Area Manager.

8.5 Energy and Water Consumption

Data on all utilities used within the depot is gathered using the STARK® utility measurement system. The Environment Team report this data monthly to the QSE Meeting and through the M Group Highways Environmental Reporting Hub. The data is also used to generate scope 1, scope 2 & scope 3 carbon emissions for the contract.

A Depot Utilities Plan can be found in **Appendix D**.

8.6 Noise and Vibration

The impact of noise and vibration upon residents is not considered to be significant.

Residential properties are located adjacent to the boundary fence at the north of the depot. Residential Properties located to south of the depot are approximately 150m away. Depot Staff are informed of the need to minimise noise on site as well as on the health risks associated with noise and vibration exposure.

The depot is setup to be operational 24 hours per day. Where an issue occurs due to activities outside of the norm, a noise risk assessment will be completed by the Environment Team.

8.7 Traffic

The depot operates with a one-way traffic system. Parking for operational vehicles is spread throughout the depot, however certain plant such as the Dragon Patcher has an allotted space within the depot.



M GROUP

There are 26 car parking spaces available for private vehicles in front of the central office building, there is a further 40 car parking spaces for private vehicles in the centre of the depot next to the weighbridge. Cycling facilities are also available for all staff and visitors.

8.8 Geology and Soils

There are no records of geological SSSIs within 1km of the depot. Where excavation works are planned within this depot the Environment Team should be consulted. There are no records of Active or Historic Landfill sites within 1km of the site.

8.9 Drainage and the Water Environment

The drainage plan for this depot can be seen in **Appendix C** of this DEMP and can also be found on the EHS noticeboards of the depot. Foul drainage is indicated in RED and surface water drainage is indicated in BLUE.

The interceptor(s) at this depot are cleansed and maintained on a biannual basis. A copy of this record can be found the Waste Management system.

Drayton depot has an Environmental Permit (Surface Water Discharge) from the Environment Agency (TH/CNTM.1589/001). Drayton Depot has a connection to public foul sewerage system and therefore holds a Trade Effluent Discharge consent from Thames Water (TDRT0202). The trade effluent consent stipulates the following limits:

- Rapidly Settleable Solids (Limit 100mg/l)
- Settleable Solids (Limit 1000mg/l)
- Chemical Oxygen Demand (Limit 1000mg/l)
- Unsaponifiable Oils and Greases (Limit 50mg/l)
- Available Chlorine (Limit 50mg/l)
- PH (Limits 6.0-11.0)

Discharges to surface and foul sewerage pass through interceptors at this depot. Maintenance records of which are available within the [shared environment folder](#).

The site is connected to the Foul Sewerage system managed by Thames Water. This leaves the site at Grid Reference **SU49834402**. Monitoring of effluent discharged to foul sewerage should be undertaken from the manhole at Grid Reference **SU48849399 (Appendix B)**.

Any pollution incidents or damage to site infrastructure for sealed drainage etc need to be reported to the Environmental Team and rectified immediately.

8.10 Waste Treatment & Transfer Station

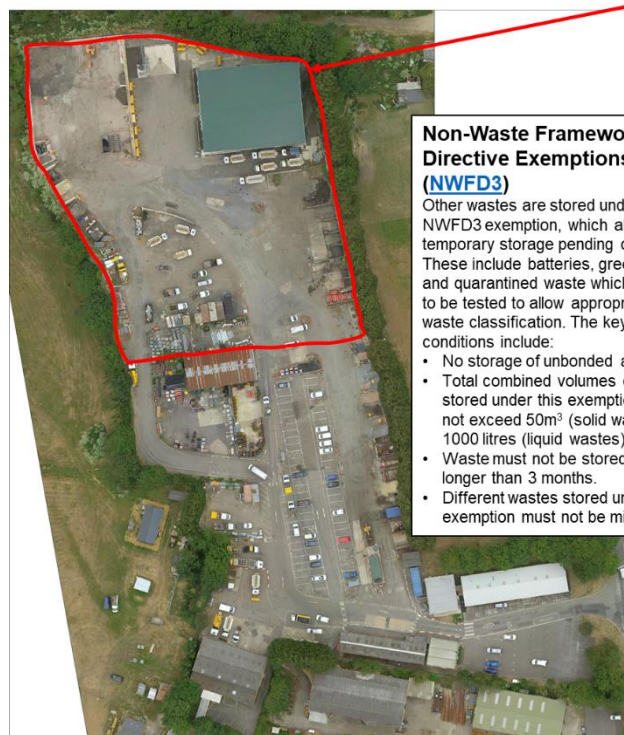
This DEMP should be read in conjunction with the Contract Waste Management Plan which sets out the conditions of the environmental permit and the procedures in place to comply with this permit.

The Drayton Depot operates under Waste Exemptions and an Environmental Permit (Ref: EPR/QP3899ED) to enable use, storage, treatment and disposal of both hazardous and non-hazardous waste streams. **Figure 8.10A** illustrates the waste management areas of Drayton Depot. Permitted waste activities must only be carried out in the area highlighted in red. Waste is also stored and treated under the two waste exemptions registered to the site (S1, T15), as well as the Non-Waste Framework Directive (NWFD 3) exemption.

Figure 8.10A Waste operations permitted area



M GROUP



Non-Waste Framework Directive Exemptions (NWFD3)

Other wastes are stored under the NWFD3 exemption, which allows temporary storage pending collection. These include batteries, green waste and quarantined waste which needs to be tested to allow appropriate waste classification. The key conditions include:

- No storage of unbonded asbestos
- Total combined volumes of waste stored under this exemption must not exceed 50m³ (solid wastes) or 1000 litres (liquid wastes).
- Waste must not be stored for longer than 3 months.
- Different wastes stored under this exemption must not be mixed.

Waste Installation Permit Area (QP3899ED)

- 17.03.01* Bituminous mixtures containing coal tar
- 17.05.03* Soil and Stones containing hazardous substances
- 17.05.05* Dredging spoil containing hazardous substances
- 17.01.01 Concrete
- 17.01.02 Bricks
- 17.01.07 Mixtures of concrete, bricks, tiles and ceramics
- 17.03.02 Bituminous mixtures other than those mentioned in 17.03.01*
- 17.04.07 Mixed metals
- 17.05.04 Soil and stones other than those mentioned in 17.05.03*
- 17.05.06 Dredging spoil other than those mentioned in 17.05.05*

Hazardous Hazardous Waste Consignment Note required
Non-hazardous Waste Transfer Note required

T15 Waste Exemption (WEX272986)

Treating a single type of waste aerosol cans by puncturing them using specialist treatment equipment, so that the metal can be recovered. Single type refers to the contents and propellants of all the cans crushed which must be the same to ensure incompatible contents are not mixed. You can store or treat up to 3,000 cans in any 12-month period in a secure and well-ventilated area.

S1 Waste Exemption (WEX272986)

- 13.01.09* - 13.01.13* Hydraulic oils (various types)
- 13.02.04* - 13.02.08* Engine, gear & lubricating oils (various types)
- 13.07.01* Fuel oil & diesel
- 15.02.02* Used spill kit, absorbents, spill PPE
- 16.01.07* Oil filters
- 15.01.01 Cardboard & paper packaging
- 15.01.02 Plastic packaging
- 15.01.04 Metallic packaging
- 15.01.07 Glass packaging
- 15.01.09 Textile packaging
- 20.01.01 Office paper & cardboard
- 20.01.39 Office plastics
- 20.01.40 Office metallic waste
- 20.01.02 Office glass
- 20.01.10 PPE (not contaminated)

Hazardous Hazardous Waste Consignment Note required
Non-hazardous Waste Transfer Note required

The management of the depot exemptions and permits will be maintained by the contract Technically Competent Manager and the Environment Team. The depot has a weighbridge and all waste entering and leaving the depot is weighed to ensure accurate figures are reported and to prevent environment permit breaches relating to excess storage and disposal of waste.

The principal operations of the waste installation permit are:

Gully Waste Dewatering

De-watering and off-site recycling of gully waste from generated highways network. Waste is tipped from gully tankers and water is separated from solids. Solids are removed from site for recycling or are treated on site prior to re-use elsewhere.

The wet waste dewatering bay (WWDB) infrastructure for street cleaning residues (EWC 20 03 03) was upgraded in May 2022 as the existing bays were no longer fit for purpose having been in place for 20 years. The new infrastructure consists of the following:

- 3 tipping bays constructed from pre-cast concrete 'Lego' blocks with 4 no. voids in the back wall of each bay containing [Enviroflow](#) filtration boards.
- A large storage bay for dewatered wet waste to facilitate further drying, also constructed from pre-cast concrete 'Lego' blocks.
- An impermeable base constructed from a combination of concrete and asphalt. This is surrounded by a channel to capture any runoff, and the whole area drains into the foul network through a series of new chambers and sealed pipework.
- A channel behind the dewatering bays with 'baffles' made from concrete kerbs to promote further settlement of fines. There is also a 'U' bend pipe built into the back channel with a filtration sock on the end.
- A '[Smart Chamber](#)' to provide additional filtration of fines and contaminants including potential hydrocarbons.
- 2 additional settlement pits which were part of the original infrastructure and have been connected in to form part of the drainage system for the new infrastructure.
- A final 2,000 litre oil interceptor which water passes through before out falling into the wider depot foul drainage network approximately 130m south of the final discharge point.

Further upgrades were adopted in 2024:

- Metal grid filters replacing the enviro-flow filtration boards.
- A new maintenance regime was also introduced to improve dewatering and support the drainage infrastructure of the depot. This is tracked via a Microsoft Forms checklist.

Appendix N contains as-built drawings showing the detail and dimensions of the new infrastructure.

Figure 8.10B below provides an aerial photo of the WWDB infrastructure, taken on 17 May 2023.



Based on current usage, vehicles dewater into Bay 2 and then tip into Bay 1. Bay 3 is currently only used as a contingency if required due to factors such as higher throughput, wetter conditions, quarantine requirements etc.

Water passes through the metal grids in the back wall of the dewatering bays into the back channel.. Once in the back channel, water flows through further metal grids which promotes further settlement, before passing through a 'U' bend pipe with a final metal grid on the end. This water then passes through the Smart Chamber, settlement pits, and oil interceptor, before out falling into the wider depot foul drainage network in accordance with the depot trade effluent discharge consent (TDRT0202) issued to Oxfordshire County Council by Thames Water. Monthly sampling is undertaken to monitor compliance of discharges with prescribed limits.

Once sufficiently dewatered, the solid waste is removed from the bays and placed within the larger storage bay for further drying prior to collection. The storeman turns the waste in the storage bay and spreads it out within the area which drains to the foul network periodically to promote further drying. Collection is arranged based on dryness and/or capacity within the storage bay, and is initiated by the storeman phoning a designated contact at 2ZLF (0333 305 2122). The solid waste is transported by [Bulk Freight](#) using a 28 tonne lorry to West Meadows Waste Recovery Facility operated by 2ZLF Ltd ([AB3904UQ](#)), with the contingency receiving facility being Dix Pit operated by Controlled Reclamation Ltd ([FB3430DD](#)).

The WWDB throughput is typically 500-1000 tonnes per annum depending on various factors such as weather, maintenance programmes, and primarily accepts gully cleansing waste from the highways network. A majority of the throughput will be from Drainline who have been subcontracted to manage the gully waste work stream.

Third parties will not be allowed to use the WWDB infrastructure without prior approval from the Area Manager and Technically Competent Manager (TCM). Each individual operative using the WWDB

infrastructure must receive a bespoke induction before first use. A [briefing record](#) must be completed to confirm this and saved on the shared drive.

The WWDB infrastructure must be maintained in accordance with the agreed schedule. Operatives will record maintenance activities using the maintenance tasks [log/diary](#), which will be closely monitored by the Environmental Advisor, Technically Competent Manager, and designated Supervisor to ensure compliance.

Waste should be inspected at the point of tipping to check for any evidence of unchartered contamination, such as sharps, asbestos, fuels, chemicals etc. If such issues are encountered, the affected bay will be closed by installing appropriate signage and sandbags will be deployed in the back channel to enable containment. Laboratory testing will be undertaken through Chemtest Eurofins to enable suitable waste classification and compliant waste disposal before the affected bay is reopened. Although not necessary from a waste classification perspective (as street cleaning residues is an absolute non-hazardous waste code – EWC 20 03 03), the dewatered wet waste is also subject to monthly laboratory testing as part of the routine depot sampling regime and due diligence.

Waste acceptance, removal, and quarantine procedures must always be adhered to, including completion of suitable waste documentation (e.g. Waste Transfer Notes) for all incoming and outgoing waste movements. These requirements will be communicated as part of the bespoke induction for the WWDB infrastructure. Additional guidance will be provided within the weighbridge shelter.

Inert Aggregate Recycling

Aggregate from highways excavations will be brought back to the depot and segregated into designated bays. Waste streams will be sent off-site for recycling or crushed onsite and sent off-site for recycling.

Tar Based Aggregates Recycling

Asphalt containing coal tar will be stockpiled until sufficient volumes are available to be manufactured into Hydraulically Bound Materials (HBM), Cold Recycled Bituminous Materials (CRBM), Cement Bound Mixtures (CBM) onsite and subsequently used on highway improvement schemes. At this stage asphalt containing coal tar is being taken directly to Micheldever whilst we await a programme from OCC.

The **Technically Competent Manager (TCM)** is Oliver Beech. The contingency TCM is Luke Bridges (MTS Environmental Ltd - to be updated with continuing competence certificate in September 2021). See **Appendix E** for both WAMITAB certificates. The TCM is currently required to be based on site 1 day per week (9 hours) due to the permit waste activities being undertaken within the depot (storage of tar-bound asphalt, storage and treatment of gully waste, storage of other inert and non-hazardous permit waste streams). This was agreed with the Environment Agency (Shani Gaskell) via email on 8th January 2020. Current arrangements have been confirmed with the Environment Agency (Matt Rice) 21st April 2023.

Table 8.10C describes the wastes permitted onto site and the maximum storage quantities and times. This will be checked on a weekly basis by the Technically Competent Manager or Environment Team.

All waste storage bays are identified using clear signage detailed the waste type and EWC code. The types of wastes being stored within these bays is inspected during inspections to ensure that waste bays contain the correct waste types. Hazardous wastes can be identified as their EWC codes end with an asterisk (*).

Table 8.10C Permitted Waste types for storage and treatment

EWC Code	Waste Description	Permitted Quantities
17 03 01*	Bituminous mixtures containing coal tar	Total combined maximum quantity of waste accepted at the site shall be no more than 75,000 tonnes per annum with no more than 10,000 tonnes to be stored in total at any one time. Total combined maximum quantity of waste accepted at the site shall be no more than 75,000 tonnes per annum with no more than 10,000 tonnes to
17 05 03*	Soil and stones containing hazardous substances	
17 05 05*	Dredging spoil containing hazardous substances	
17 01 01	Concrete	
17 01 02	Bricks	
17 01 07	Mixtures of concrete, bricks, tiles and ceramics	
17 03 02	Bituminous mixtures other than those mentioned in 17 03 01*	
17 04 07	Mixed metals	

17 05 04	Soil and stones other than those mentioned in 17 05 03*	be stored in total at any one time
17 05 06	Dredging spoil other than those mentioned in 17 05 05*	
19 12 12	Other wastes from mechanical treatment of wastes other than those mentioned in 19 12 11*	
20 03 03	Street cleaning residues (gully waste and road sweepings)	

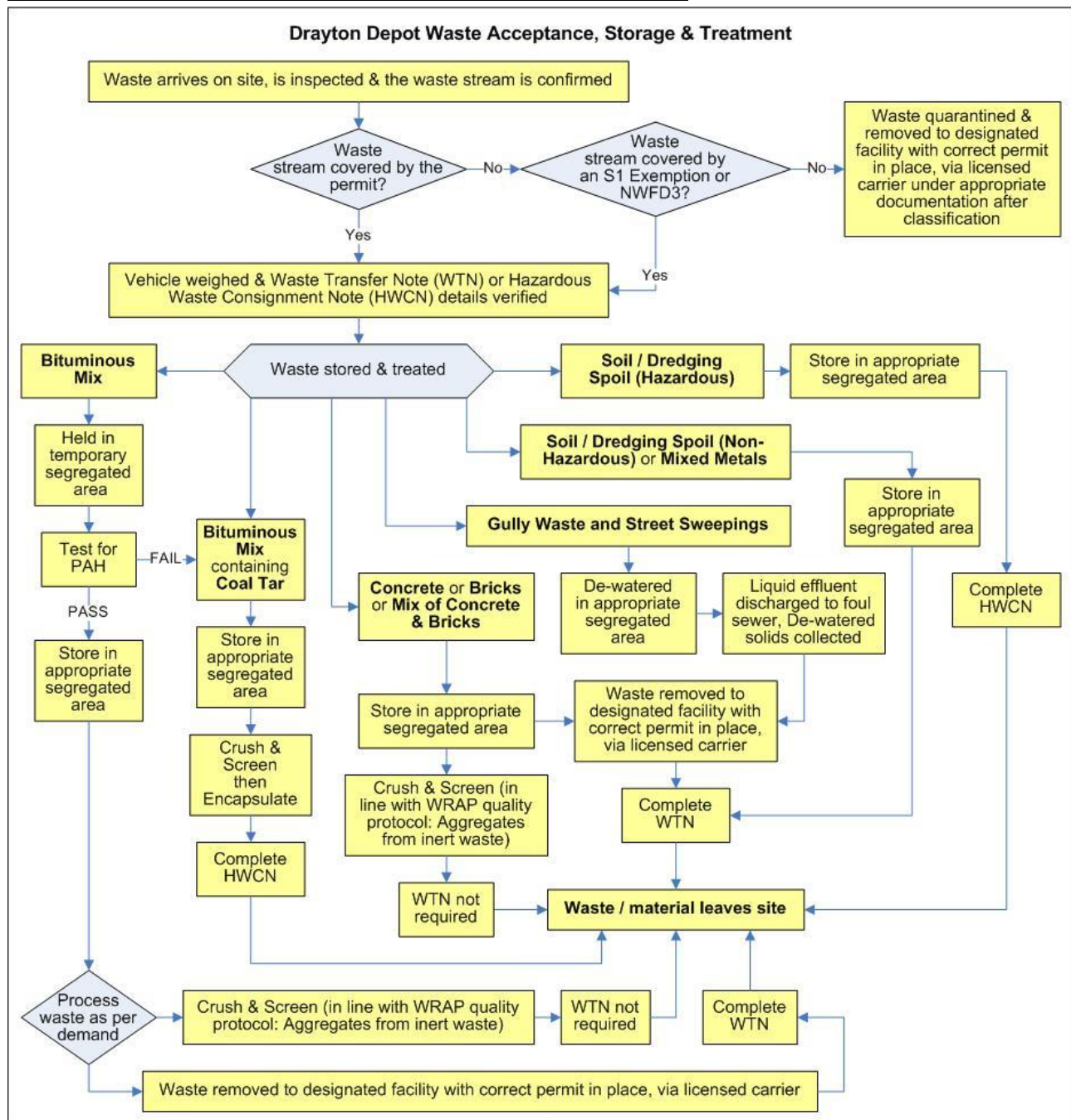
Waste streams not covered within the permit (see **Table 8.10B**) are strictly prohibited from being stored inside the permitted area unless agreed otherwise with the Environment Agency.

Site Operations

Figure 8.10D below, describes the process for Waste Acceptance, Storage / Treatment and Removal at the site. All waste will be inspected, and the vehicle weighed prior to waste being accepted or removed from site. All supervisors have signed on to a Waste Management Briefing which can be found on the [P-Drive](#)

All wastes accepted or removed from site will be accompanied by an accurately completed Waste Transfer Note / Hazardous Waste Consignment Note. Waste Transfer notes / Hazardous waste consignment notes are recorded by the Construction Administrators. These figures are reviewed weekly to ensure that permit waste storage quantities are not breached. Additional guidance relating to waste transfers into and out of the depot is provided on the whiteboards within the weighbridge shelter.

Figure 8.10D Waste Acceptance, Storage and Treatment Process



8.11 Drayton Depot Environmental Permit Conditions

This document details a management system for operations at Drayton Depot to accompany Environmental Permit, reference QP3899ED/V004. This permit allows the storage and treatment of waste streams generated from the Oxfordshire Highways partnership.

Table 8.11 Permit conditions for Drayton Depot

Condition Number	Permit Condition	Control Measure
General Management		
1.1.2 & 1.1.4	The Operator shall comply with the requirements of an approved competence Scheme.	TCM cover provided by a representative who holds a Level 4 in waste management operations: Management and Treatment of Hazardous wastes.
1.1.3	Any Person having duties that are or may be affected by the matters set out in this permit shall have convenient access to a copy of it kept at a / or near a place where those duties are carried out.	A copy of the Environmental Permit is stored on the Environment Notice Board in the central office building. An electronic copy is also stored on the P-Drive
Energy Efficiency		
1.2.1	The Operator shall take appropriate measures to ensure that energy is used efficiently in activities, review and record at least every 4 years whether there are suitable opportunities to improve the energy efficiency of activities, take any further appropriate measures identified by a review.	Energy efficiency will be reviewed and recorded in activities conducted at the facility every four years. If appropriate measures are identified as part of a review, they will be implemented. Any issues regarding inefficient use of energy will be identified and rectified as soon as possible. Energy usage at the site is monitored and reported into the ERH data reporting system. This data is collated monthly by the Oxfordshire Highways Environmental Advisor.
Efficient use of Raw Materials		
1.3.1	The Operator shall take appropriate measures to ensure that raw materials and water are used efficiently in activities, review and record at least every 4 years whether there are suitable opportunities to improve the energy efficiency of activities, take any further appropriate measures identified by a review.	Raw Material and water usage efficiency will be reviewed and recorded in activities conducted at the facility every four years. If appropriate measures are identified as part of a review, they will be implemented. Data on raw materials and water used at the site is recorded on a monthly basis to the ERH Data reporting system. This data is collated monthly by the Oxfordshire Highways Environmental Advisor.
Avoidance, recovery and disposal of wastes produced by the activities		
1.4.1	The Operator shall take appropriate measures to ensure that the waste hierarchy referred to in article 4 of the waste framework directive is applied to the generation of waste by the activities and any waste generated by the activities is treated in accordance with the waste hierarchy referred to in article 4 of the waste framework directive and where disposal is necessary this is undertaken in a manner which minimises the impact on the environment.	The waste treatment operations at the depot are not expected to generate waste, however if waste is generated as part of the treatment operations, this will be undertaken in accordance with the waste hierarchy and in a method, that minimises negative environmental impacts. All waste leaving the depot will be accompanied by accurate waste transfer notes / hazardous waste consignment notes.
1.4.2	The Operator shall take appropriate measures to ensure waste generation is avoided from activities and review and record at least every 4 years whether there are suitable opportunities to avoid the generation of wastes from activities, and take any further appropriate measures identified by a review.	Waste production as a result of the site activities will be reviewed and recorded in activities conducted at the facility every four years. If appropriate measures are identified as part of a review, they will be implemented. Monthly waste data is recorded via the ERH Waste Management System, data from this is collated by the Oxfordshire Highways Environmental Advisor.
Operations – Permitted Activities		



M GROUP

2.1.1	The Operator is only authorised to carry out the activities listed in Schedule 1 table S1.1	AR1-AR3 Activities (processing of hazardous wastes) conducted on site will be completed in line with Schedule 1 Table 1.1. All hazardous wastes shall be stored on impermeable ground with sealed drainage. Hazardous wastes can only be stored temporarily before being treated offsite or dispatched offsite. Treatment is limited to sorting, separation, screening, crushing, blending and mixing of waste. Total combined maximum quantity of waste accepted at the site shall be no more than 75,000 tonnes of 17 03 01* (coal tar asphalt), 17 05 03* (hazardous soil and stone) and 17 05 05* (hazardous dredging spoil) per annum with no more than 10,000 tonnes to be stored in total at any one time. AR4 Activities (treatment of inert and excavation wastes) conducted on site will be completed in line with Schedule 1 Table 1.1. Treatment is limited to manual sorting, separation, screening or crushing of waste into different components for recovery or disposal. The quantity of wastes treated for disposal shall not exceed 50 tonnes per day. Waste types and quantities as specified in table S2.3.
2.1.2	Waste authorised by this permit shall be clearly distinguished from any other waste on site	All waste stored in the depot will be segregated and stored within suitable bays / skips. All waste storage bays / skips will be clearly signed.
Operations – The Site		
2.2.1	Activities undertaken at the site shall not extend beyond the site, being the land show in red on the site plan	Activities will not be conducted outside of the red area documented on the site plan (Appendix F)
Operating Techniques		
2.3.1	The activities shall, subject to the conditions of this permit, be operated using the techniques and in the manner described in the documentation specified in schedule 1, table S1.2, unless otherwise agreed in writing by the Environment Agency	Operations conducted will be in line with operations described within Schedule 1, table S1.2.
2.3.4	Waste shall only be accepted if: it is of a type and quantity listed in schedule 2 tables S2.2 and S2.3; and it conforms to the description in the documentation supplied by the producer and holder.	Only wastes listed in Schedule 2 tables S2.2 & S2.3, will be accepted on the site. This will be controlled through training / briefings, waste transfer note / hazardous waste consignment notes, inspections and audits.
2.3.5 & 2.3.6	The operator shall ensure that where waste produced by the activities is sent to a relevant waste operation, that operation is provided with the following information, prior to the receipt of the waste: - the nature of the process producing the waste. - the composition of the waste. - the handling requirements of the waste. - the hazardous property associated with the waste, if applicable. - the waste code of the waste. - where waste produced by the activities is sent to a landfill site, it meets the waste acceptance criteria for that landfill.	All waste leaving the site will be accompanied by an accurate waste transfer note / hazardous waste consignment note. A copy of which will be stored on site and available for inspection at any point
2.3.7	Hazardous waste shall not be mixed, either with a different category of hazardous waste or with other waste, substances or materials.	All hazardous waste will be clearly segregated from other hazardous and non-hazardous waste streams. If an incident occurs whereby waste streams are mixed in a non-compliant manner, then this will be reported through the OPTIMUS incident reporting system and fully investigated. All waste streams will always be clearly



M GROUP

		signed with an accurate description of the waste type and EWC code.
--	--	---

Emissions to Water Air and Land

3.1.1 / 3.1.2	There shall be no point source emissions to water, air or land, the limits given with Schedule 3 shall not be exceeded	The operation is not expected to generate point source emission to air, water or land. In the event of point source emissions occurring to air, water or land, this shall be treated as a pollution incident and reported using OPTIMUS reporting system (0800 028 0676) to all necessary site contacts and the Environment Agency. During treatment operations monitoring will be undertaken to ensure that point source emissions to air, water and land are not generated.
3.1.3	Periodic Monitoring shall be carried out at least once every 5 years for groundwater and 10 years for soil unless such monitoring is based upon a systematic appraisal of the risk of contamination	Periodic Monitoring or soil and groundwater will be undertaken at 5- & 10-year intervals respectively, unless agreed otherwise with the Environment Agency. This will entail sampling through boreholes / coring and laboratory analysis.

Emissions of substances not controlled by emission limits

3.2.1	Emissions of substances not controlled by emission limits (excluding odour) shall not cause pollution.	Daily visual monitoring of aerial emissions at site boundaries shall be carried out by supervisors and operatives. The following control measures will be enforced on site to control dust emissions: • Waste Treatment operations to be undertaken within suitable weather windows. • In the event of high wind, waste treatment operations will not be conducted. • Weather forecasts are to be monitored periodically throughout waste treatment operation. • All incoming loads to be tipped in such a way as to minimise dust generation. • All loading /unloading activities to be undertaken carefully to prevent waste materials being dropped from a height. • Stockpiles of dusty material to be kept as small as possible. • Dusty materials will be located in sheltered areas if possible and provided with a suitable cover. • No storage of waste outside designated containers or stockpile areas. • Vehicle speed limit of 5mph enforced throughout depot. • Water suppression to be used where required. • No fires are permitted at any time or location.
-------	--	---



M GROUP

3.2.3	All liquids in containers, whose emission to water or land could cause pollution, shall be provided with secondary containment, to prevent and minimise leakage / spillage from chemical container	- All chemicals, fuels and oils will be stored on a bund/drip tray/nappy or within a suitably bunded area. This must be able to hold 25% of the capacity of storage containers up to 205 litres capacity, or 110% if over 205 litres. If secondary containment is for multiple containers, this will need to hold a volume equal to either 110% of the largest container, or 25% of all the container volumes added together, whichever is greatest. - Fully stocked spill kits will be maintained on site at all times and site staff will be frequently trained on how to use these. - Training records will be maintained with the Contract Training coordinator. - All chemical, oil or fuel spillages or leakages will be reported to the OPTIMUS incident reporting line (0800 028 0676) and investigated to identify lessons learnt and to prevent re-occurrence. - Onsite fuel tanks will be inspected annually to ensure that fuel tank integrity remains - Site Interceptors will be regularly serviced to ensure that they remain effective.
-------	--	--

Odour

3.3.1	Emissions from the activities shall be free from Odour at levels likely to cause pollution outside the site as perceived by an authorised officer of the Environment Agency.	- No Wastes producing pungent / strong odours will be accepted onto site. - Any waste that starts to produce pungent / strong odour will be removed from site immediately and a report raised on the OPTIMUS reporting system (0800 028 0676). - If complaints are received regarding odours these will be documented on the OPTIMUS and thoroughly investigated.
-------	--	---

Noise and Vibration

3.4.1	Emissions from the activities shall be free from Noise and Vibration at levels likely to cause pollution outside the site as perceived by an authorised officer of the Environment Agency.	- Noise and vibration will be managed in accordance with BS5228 and best practical means of noise and vibration mitigation. - Compressor equipment and pneumatic tools brought onsite will be silenced or sound reduced models fitted with acoustic enclosures. - All plant items will be maintained and operated according to manufacturer's recommendations. - If noise complaints are received, the Site Agent shall keep records of the complaint and demonstrate to the complainant that all practicable efforts have been made to ensure noise levels are limited as much as possible. These will be reported to the OPTIMUS reporting line (0800 028 0676). - Stationary vehicles shall not be left to idle unless necessary. - Utilise best practical means as defined in Section 72 of the control of pollution act 1974 to reduce noise and vibration at all times. - Engine compartments will be closed during operation. - Avoid dropping material from excessive height - A quiet work ethic will be employed at all times to ensure workers have consideration for nearby residents.
-------	--	--



M GROUP

		Noise from reversing vehicles will be minimised within the depot due to the use of a one-way system.
Monitoring		
3.5.1 / 3.5.4	The operator shall unless otherwise agreed in writing by the Environment Agency undertake the monitoring specified in Table S3.1 & S3.2. Permanent means of access will be maintained to enable sampling and monitoring.	- Monitoring of trade effluent and surface water discharges are undertaken by monthly through Chemtest. - Testing of waste generated by highway maintenance operations is also undertaken monthly by Chemtest. - Laboratory analysis is undertaken against values specified in the Thames Water Trade Effluent Consent and Guideline Values (e.g., drinking water standards, environmental quality standards etc.). - Results are analysed by Environment Team and if breaches are identified this will be highlighted to Area Manager / TCM for rectification. - Any breaches will be recorded on the OPTIMUS reporting line (0800 028 0676), this will be investigated to prevent re-occurrence and to share lessons learned.
3.5.2.	The operator shall maintain a record of all monitoring required by this permit	All records of monitoring, analysis, calibrating and sampling will be maintained on the P Environment Shared Drive &/or the Environment Notice Board within the depot.
3.5.3.	Monitoring equipment, techniques, personnel and organisations employed for emissions monitoring shall have either MCERTS certification / MCERTS accreditation	Waste and water quality testing is undertaken through Chemtest who are UKAS accredited. MCERTS accreditation is displayed on the laboratory reports.
Fire Prevention		
3.6.1.	The operator shall take all appropriate measures to prevent fires on site and minimise the risk of pollution from them	- No wastes shall be burnt on site at any point. - There will be no smoking on site unless in a designated area. - The use of welding/cutting tools (i.e., with naked flame) first requires prior permission from the Area Manager / Technically Competent Manager. - Fire Extinguishers are readily available around the depot and staff are briefed to recognise smouldering wastes. - Combustible waste streams are segregated and stored away from sources of ignition. - Clay drain covers are stored within the depot to block drainage to prevent firefighting effluent from entering drainage system.
Records and Reporting		
4.1.2	The operator shall keep on site all records, plans and the Management System required by this permit	- An electronic copy of all records and plans is maintained on the Environment Shared Drive. A physical copy of the Site Drainage plan, Permit and copy of the Management system is displayed on the Environment Notice board, all records will be maintained for at least 6 years. - Records for off-site Environmental effects; and matters which affect the condition of the land and groundwater will be maintained until the permit is surrendered by Oxfordshire County Council.
4.2.2 / 4.2.3	A report on the performance activities over the previous year shall be submitted to the Environment Agency by 31 st January which includes: A review of results of the monitoring and assessment carried out in accordance with	Figures for the Performance Criteria (Waste Production and Treatment & Water usage) will be completed and submitted by the Environment Agency before 31 st January each year for the previous year.

	the permit including an interpretative view of the data • The Annual waste Production and treatment data (Appendix G) • Performance Parameters (Water) in Appendix H	
4.2.4	The Operator shall, unless notice under this condition has been served within the preceding 4 years, submit to the Environment Agency, within 6 months of receipt of a written notice, a report assessing whether there are other appropriate measures that could be taken to prevent, or where that is not practicable, to minimise pollution.	On receipt of a written notice a report will be submitted to the Environment Agency detailing whether there are appropriate measures to prevent or minimise pollution. This will be continuously monitored / reviewed when undertaking depot / permit inspections.
4.2.5	Within 1 month of the end of the quarter, the operator shall submit to the Environment Agency details of waste accepted and removed from the site during the previous quarter.	Details of waste accepted and removed from the site during each quarter is submitted to the Environment Agency through national operator returns and consignee returns at the end of each quarter.
Notification		
4.3	In the event that the operation of the activities gives rise to an incident or accident which significantly affects or may affect the environment, the operator must immediately • Inform the Environment Agency • Take measures necessary to limit the environmental consequences of such accident / incident • Take measures to prevent further accidents • Inform the environment agency of any breach of permit • Take measures to ensure that compliance is returned in the shortest possible time • Immediately suspend the operation or relevant activities until where requires until compliance with the permit is returned • Confirm the incident to the EA using Appendix K	In the event of a pollution incident occurring on site works will immediately be stopped and Environment Incident response plan put into practice. • Fully Stocked spill kits are readily available around the depot and training to operatives about how to use spill kits is provided annually. • All pollution incidents will be reported to the OPTIMUS reporting system (0800 028 0676). • All pollution incidents will be fully investigated • Pollution incidents occurring on site which have the potential to / have caused pollution will be notified to the Environment Agency

8.12 Waste Management

Site plan **Appendix B** illustrates the waste storage areas on site. This site is manned during office hours, meaning waste acceptance on site can be supervised.

Out of office hours the weighbridge is manned by a Supervisor who has received a briefing on waste transfers into and out of the depot. Clear guidance is also provided on the whiteboards within the weighbridge shelter.

The following waste streams require regular management at this site: (NB. Hazardous waste categories are denoted by an asterisk *)

EWG Code	Waste Stream
15 01 10*	Aerosols – empty packaging containing residues
20 01 33*	Batteries – mixed and accumulators
17 03 01*	Bituminous mixtures containing coal tar
17 03 02	Bituminous mixtures other than those mentioned in 17 03 01*
17 01 01	Concrete
17 04 07	Mixed metals
17 09 04	Mixed construction and demolition waste

16 01 07*	Oil filters
20 01 01	Paper and cardboard (mixed)
02 01 03	Plant tissue waste (green waste)
17 02 03	Plastics
17 05 04	Soil and stones other than those mentioned in 17 05 03*
20.02.01	Biodegradable Waste
20.03.01	Mixed Municipal Waste
20.03.03	Gully Waste and Street Cleaning Residues
17 05 03*	Soil and Stones containing Hazardous Substances
15 02 02*	Spill Kits (used) – Absorbents, filters, cloths, contaminated protective clothing, oily rags and gloves
17 02 01	Wood
16 02 14	Discarded equipment other than those mentioned in 16.02.09 – 16.02.13
17 02 04*	Timber containing hazardous substances

In addition to the waste-related permit conditions outlined in Sections 8.10 and 8.11 above, the following additional control measures will also be employed on site.

Control Measure	Responsibility
Waste shall be segregated and clearly marked in accordance with the waste hierarchy. Signage will contain as a minimum the waste type and the relevant EWC code.	Area Manager or Supervisors / Site Agents
Waste shall be correctly stored in suitable containers / storage bays.	Technically Competent Manager / Depot Storeman
Waste shall be stored on impermeable surfaces and run-off isolated from surface drainage systems.	Technically Competent Manager
The capacity and size of containers shall be suitable for the anticipated volume of waste.	Area Manager or Supervisors / Site Agents
All waste disposal sites shall be authorised by a suitable waste exemptions or Environmental permit issued by the Environment Agency.	Supervisors &/or Site Agents and Environment Team
A Waste Transfer Note (WTN) shall be prepared for all inert / non-hazardous / WEEE / 'special' waste movements to and from the depot. Each transfer note should accurately classify the waste using the European Waste Catalogue (EWC) code, confirm that the waste hierarchy has been applied and confirm the business SIC code.	Area Manager &/or Supervisors
A Hazardous Waste Consignment note shall be prepared for all hazardous waste movements from the depot. Each consignment note will accurately classify the waste using the European Waste Catalogue (EWC) code, confirm that the waste hierarchy has been applied and confirm the business SIC code.	Supervisors &/or Site Agents
Data included within Waste Transfer Notes and Hazardous Waste Consignment Notes shall be input into the Credit 360 waste management system.	Depot Technical Admin &/or Environment Team
Due to the nature of operations on site it is recognised that there may be times when a load will need to be rejected or quarantined in an area for onward disposal. A 'quarantine area' will be available at all depots details of any rejected or quarantined loads will be recorded on the OPTIMUS system for further investigation.	Area Manager &/or Environment Team
A notice board will be permanently installed at the site entrance informing members of the public about the site. It will include: - the permit holder's name (company name at least), - a statement that the site is permitted by the Environment Agency, - the Environmental permit number (QP3899ED); and - Environment Agency telephone number (03708 506506) and the incident hotline (0800 807 060).	Area Manager / Environment Team

8.13 Climate Change Adaptation

A Climate Change Risk Assessment and associated Climate Change Adaptation Plan are being produced in accordance with EA requirements and recognition that the Drayton Depot facility needs to be resilient to both

current and future impacts of climate change. This is to help ensure that risks to the local environment and communities are considered, and potential impacts on operations carried out under the waste installation permit are suitably mitigated to prevent potential non-compliances. This will be included as an appendix to this DEMP once approved and will consider potential impacts in line with climate projections for the UK such as:

- Higher average temperatures – particularly in summer and winter;
- More heat waves and hot days;
- Changes in rainfall patterns and intensity; and
- More storms.

These documents will be reviewed at least annually (and more regularly if necessary due to lessons learnt, additional guidance, audit findings etc.) as part of the wider management system review. The top 3 areas of concern currently include:

1. Capacity and condition of existing drainage systems;
2. Emissions from plant, vehicles, and equipment used as part of waste permit operations, as well as the embodied carbon in materials used; and
3. Increased demand to deliver safety critical highways maintenance activities linked to climate change impacts (e.g. more flooding and infrastructure defects from extreme temperatures) reducing resource availability to undertake important maintenance activities.

9. Third Party Activities

Third party organisations may be brought into the Drayton Depot to carry out waste operations permitted within the waste installation permit.

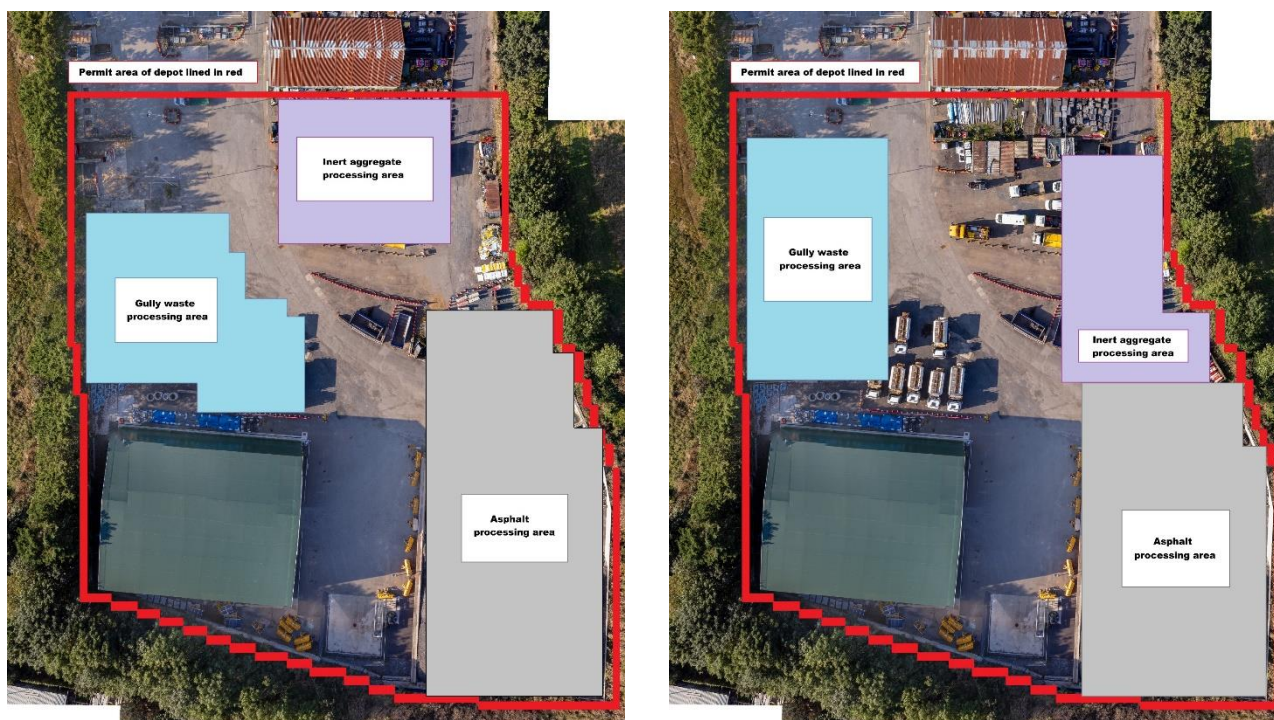
- Gully Waste at site may be treated by a third party onsite prior to re-use or recycling elsewhere.
- Inert Aggregate from highways excavations brought back to the depot may be crushed onsite by a third party onsite prior to transport offsite for recycling.
- Asphalt containing coal tar may be treated by a third party onsite to manufacture Hydraulically Bound Materials (HBM), Cold Recycled Bituminous Materials (CRBM) or Cement Bound Mixtures (CBM).

When one or more of these activities is present, the usual site layout will be altered to accommodate the new activities. The activities must be located within the permit area and two activities should not take place in the same space at the same time. If these two rules are followed, the exact footprint (i.e. size and location) of each activity can be fitted to the specific needs of the third party operating the activity. Figures 9A and 9B illustrate two compliant examples of where three activities could take place simultaneously



M GROUP

Figures 9A and 9B Third party waste operation areas within the permitted zone of the Drayton Depot



Currently, no inert aggregate processing takes place.

Third parties working onsite at the Drayton Depot must work in compliance with the site environmental permit, the DEMP and the CWMP. Third parties will only be able to work onsite if they agree to adhere to the following provisions:

1. Oxfordshire County Council is the legal operator of any activities carried out at the Drayton Depot, including third party activities executed on the site. Oxfordshire County Council and the Drayton Depot Operational Team hold the right to oversee and control all third-party operations taking place at Drayton Depot on a day-to-day basis in order to ensure permit compliance, including stopping work activities if permit compliance or safety is felt to be at risk.
2. Third parties who wish to carry out a waste treatment activity onsite at Drayton Depot must review the depot's environmental permit, DEMP and the CWMP, and create a work plan that complies with these documents. The work plan must be submitted to representatives from the Depot Operations and Environment Teams to ensure it complies with the depot's environmental permit, DEMP and the CWMP. Only once the reviewed work plan has been approved can the start date for the work be arranged.
3. Any work carried out within Drayton Depot's non-permitted area must adhere to Drayton's DEMP and the CWMP. Any work carried out within Drayton Depot's permitted area must adhere to Drayton Depot's environmental permit, DEMP and the CWMP. Any third-party permits can also be used or followed provided that they do not conflict with Drayton Depot's environmental permit. If there is a conflict, the requirement in Drayton Depot's environmental permit, DEMP and/or SWMP will be the one followed.

Agreement from the third party to these three requirements must be secured in writing before any works are allowed to begin. A third-party representative must sign and date a letter to confirm that they are able to sign this agreement on behalf of their organisation and that they agree on behalf of the organisation that their work at Drayton Depot will meet these requirements.

Following this, the third party must create a work plan and submit it to representatives from the Depot Operations and Environment Teams to ensure it complies with the depot's environmental permit, DEMP and the CWMP.

To support this effort, a summary list of requirements in this DEMP, the CWMP and permit are included as an appendix to the letter. Only once the reviewed work plan has been approved can the start date for the work be arranged.

10. Management Review

This Depot Environmental Management Plan is kept in the online Integrated Management System (IMS) as well as in the shared file locations.

This Management plan will be reviewed and updated to ensure that any changes made to the site, operations or equipment are included and detail adequate environmental controls or in the event of a Waste Permit variation. The normal minimum review period shall be one per annum.

In the event of an incident, complaint or breach of the Environmental Permit the Management plan will be reviewed to and relevant additional control measures were effective and additional control measures added if required.

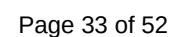
This DEMP was updated to version 9 which includes a Third-Party Activities section which presents how this activity will be controlled, overseen and permit compliance maintained. A third-party waste activities agreement letter (see **Appendix M**) was created in order to obtain a signed statement from all third parties that they will follow the requirements of the environmental permit, this DEMP and the CWMP while onsite. The letter includes a list of the requirements involved to achieve this.

Appendix A: Site Location

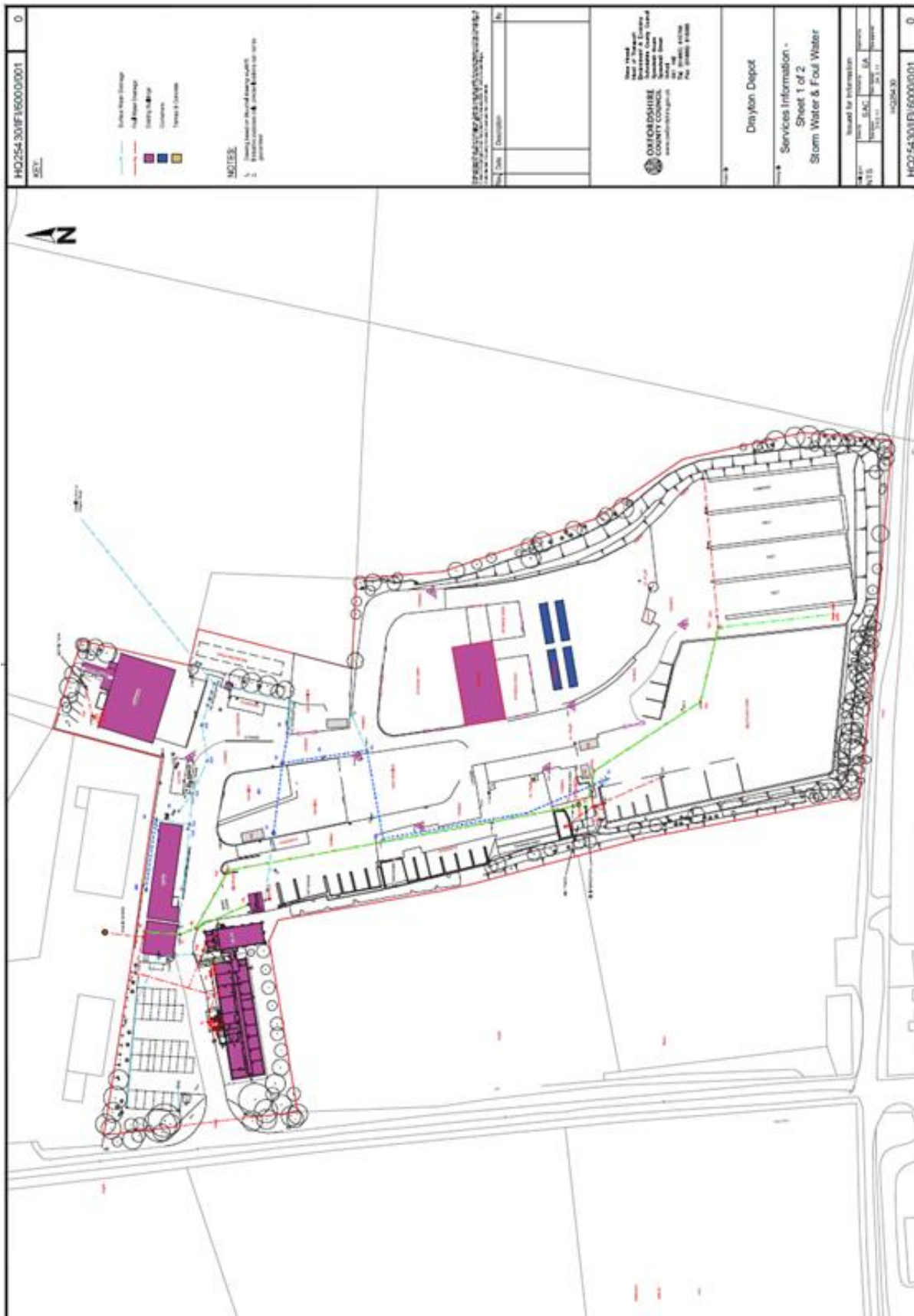




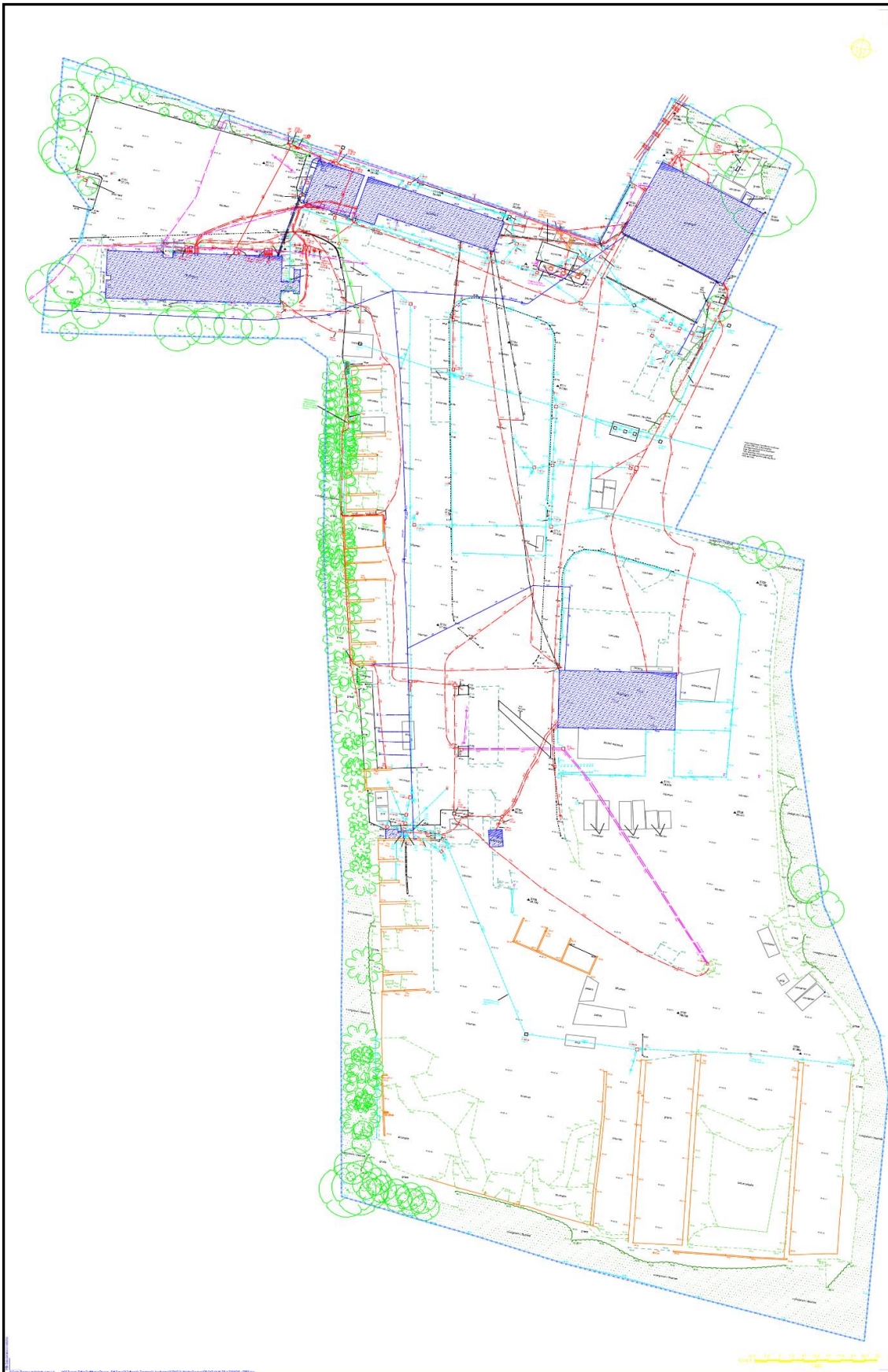




Appendix C: Site Drainage Map



Appendix D: Depot Utilities Plan





M GROUP

Appendix E: TCM WAMITAB certificate (Oliver Beech) and contingency TCM
WAMITAB Certificate (Luke Bridges)



Qualification Title:

CIWM (WAMITAB) Level 4 High Risk Operator Competence
for Managing Physical and Chemical Treatment of Hazardous
Waste

Qualification Accreditation Number:

601/8502/8

This Certificate is awarded to

Oliver James Beech

Verification date: 06/03/2023

Authorised:

Learner ID: 114095

Certificate No.: 5220643

Date of Issue: 15/03/2023



Katie Cockburn
Professional Services Director



081962CD-02F1-4405
8000-582401179018
Author@Qual.com



ofqual
REGISTERED
register.ofqual.gov.uk



Corff dyfarns cyhoeddus
QUALIFICATIONS WALES
Recognised awarding body



GEE
Regulation

The qualifications regulators logos on this certificate indicate that the qualification is accredited only for England and Wales. Qualifications Wales regulates this qualification where it is awarded to learners assessed wholly or mainly in Wales.





M GROUP



Continuing Competence Certificate

This certificate confirms that

Oliver Beech

Has met the relevant requirements of the Continuing Competence scheme for the following award(s) which will remain current for two years from 12/03/2025

TSH	Transfer - Hazardous Waste
TMH	Treatment - Hazardous Waste

Expiry Date:
12/03/2027

Verification date: 11/03/2025

Authorised:

Responsible Officer

Learner ID: 114095

Certificate No.: 5275775

Date of Issue: 12/03/2025

CIWM Chief Executive Officer



The Chartered Institution
of Wastes Management



Scan code on reverse to authenticate that this is a genuine paper



M GROUP



Qualification Title:

**WAMITAB Level 4 High Risk Operator Competence for
Managing Physical and Chemical Treatment of Hazardous
Waste**

Qualification Accreditation Number:

601/8502/8

This Certificate is awarded to

Luke Bridges

Verification date: 04/09/2019

Authorised:

Chris James
WAMITAB Chief Executive Officer

Learner ID: 19051

Certificate No.: 5149563

Date of Issue: 04/09/2019



The qualifications regulators logos on this certificate indicate that the qualification is accredited only for England, Wales and Northern Ireland. Qualifications Wales regulates this qualification where it is awarded to learners assessed wholly or mainly in Wales.

00132860

Appendix F: Environmental Permit Site Layout Plan



Appendix G: Annual Performance Reporting Templates

Permit Number	QP3899ED/V004	Operator	Oxfordshire County Council
Facility	Drayton Depot	Form Number	Performance1 / 28/07/17
Reporting of other performance indicators for the period/...../..... to/...../.....			
Parameter		Units	
Treatment of Hazardous Waste		Tonnes per year	
Treatment of Non-Hazardous Waste		Tonnes per year	
Operator's comments:			
Signed..... (authorised to sign as a representative of Operator) Print Name:..... Date:.....			

Appendix H: Annual Performance Parameters – Water Usage

Permit Number	QP3899ED/V004	Operator	Oxfordshire County Council
Facility	Drayton Depot	Form Number	WaterUsage1 / 28/07/17
Reporting of other performance indicators for the period/...../..... to/...../.....			
Water Source	Usage (m³/year)		Specific Usage (m³/unit output)
Main's water			
Site Borehole			
River abstraction			
Operator's comments:			
Signed..... (authorised to sign as a representative of Operator) Print Name:..... Date:.....			

Appendix I: Depot Permits, Exemptions and Consents

Exemption / Consent	Reference	Purpose	Expires	Location	Holder	Regulator
Environmental Waste Permit	QPED3899ED	• AR1 – treatment consisting of blending and mixing specified hazardous wastes pending dispatch offsite. Includes temporary storage of hazardous waste following treatment. • AR2 – treatment consisting of sorting, separation, screening, crushing, blending and mixing of specified hazardous wastes for recovery as an aggregate. Includes temporary storage of hazardous waste following treatment. • AR3 – temporary storage of specified hazardous wastes prior to activities AR1 and AR2. • AR4 – storage and treatment of specified inert and non-hazardous wastes consisting of manual sorting, separation, screening and crushing into different components for recovery or disposal. Specified hazardous wastes = tar-bound asphalt, hazardous soil and stone mixes, hazardous dredging's. Specified inert and non-hazardous wastes = concrete, bricks / tiles / ceramics, asphalt, mixed metals, soil and stone mixes, dredging's, gully / road sweeper residues.	N/A	South of sign shed	Oxfordshire County Council	Environment Agency
T15 – Treatment of Waste Aerosol Cans	WEX401876	To allow for the treatment of waste Aerosol Cans (Up to 3000 annually)	29/04/2027	Outside Permit Area	M Group Ltd	Environment Agency
S1 – Storage of waste in secure containers	WEX401876	Storage of certain waste streams within the depot (separate to where it was produced), before transportation to another site for recovery.	29/04/2027	Outside Permit Area	M Group Ltd	Environment Agency
NWFD 3 exemption	N/A	Temporary storage of waste at a place controlled by the producer pending re-use, recycling, recovery or disposal elsewhere	N/A	Outside Permit Area	M Group Ltd	
Waste Carriers Registration	CBDU374813	To allow for the legal transportation of waste by Infrastructure Services.	22/03/2027	As above	M Group Ltd	Environment Agency
Surface Water Discharge Consent	THCNTM. 1589001	To allow for the lawful discharge of surface water arising from the site via an interceptor.	N/A	Surface Water Discharge	N/A	Environment Agency
Trade Effluent Consent	TDRT0202	To allow for the lawful discharge of effluent into the local wastewater network.	N/A	Trade Effluent Discharge Point	N/A	Thames Water

Appendix J: Depot Permits, Exemptions and Consents

Site: Drayton Depot					Person Completing Assessment: Oliver Beech							
Review Date: October 2020			Revision No. Version 3		Job Title: Environment Manager							
Severity	5	5	10	15	20	25	Likelihood		Severity			
	4	4	8	12	16	20	Rating 1 = Very unlikely		Rating 1 = Insignificant			
	3	3	6	9	12	15	Rating 2 = Unlikely		Rating 2 = Minor			
	2	2	4	6	8	10	Rating 3 = Likely		Rating 3 = Significant			
	1	1	2	3	4	5	Rating 4 = Very likely		Rating 4 = Major			
							Rating 5 = Almost certain		Rating 5 = Severe			
		1	2	3	4	5	Likelihood					
Risk = Likelihood x Severity						Acceptable		Acceptable With Suitable Controls		Unacceptable Risk		
Environmental Aspect	Environmental Impact	Degree of Risk			Control Measures					Residual Risk		
		S	L	E						S	L	E
Fuel Station												
Vandalism or wear and tear	Contamination of land, discharge to watercourses	5	2	10 (Y)	Ensure fuel tanks meets the requirements of the Oil Storage Regulations. Pressure test at recommended intervals (5 years). Monitor fuel usage, if unexpected increase occurs investigate the cause (may be an undetected leak). Maintain valves, gauges and pipework on a regular basis					5	1	5 (Y)
Bulk deliveries of fuel	Contamination of land, discharge to watercourses	5	2	10 (Y)	Supervise deliveries to make sure that the tank is not overfilled. Train staff on the correct procedure for receiving deliveries. Ensure spill kits are available and staff know how to use them.					5	1	5 (Y)
Refuelling vehicles and plant	Contamination of land, discharge to watercourses	5	3	15 (R)	Automatic cut-off switches on pumps. Staff trained on the correct procedure for refuelling. Suitably stocked spill kits available.					5	1	5 (Y)
Pollution to surface water drains or permeable ground in vicinity of refuelling area	Discharge to watercourses	5	4	20 (R)	Drain covers / bungs should be installed in the interim, whilst accurate drainage plans are sourced. If drains do flow to surface water, they should be diverted to foul sewer or blocked up. Surface water sampling to be conducted monthly to ensure compliance with surface water discharge consent from EA. Regular checks to ensure hard standing is in good state of repair.					5	1	5 (Y)
Fire during refuelling and deliveries	Emissions to air, discharge to watercourses	5	3	15 (R)	Fire extinguishers and ensure they are tested regularly. Fire water will be diverted to foul sewer using booms/sausages and deploying drain covers.					5	1	5 (Y)

Wash down area									
Failure to maintain an updated drainage plan	Discharge to watercourse	3	3	9 (Y)	Drainage plans should be updated and amended following any changes that may impact on drainage routes. Drainage layouts should be displayed on depot notice boards.	3	1	3 (G)	
Failure of interceptors	Discharge to watercourse	4	4	16 (R)	The use of detergents is prohibited within in the depot. Wash down only permitted in designated area. Review drainage requirements regularly.	4	2	8 (Y)	
Blockage of drainage system	Discharge to watercourse	4	4	16 (R)	Visual checks are conducted weekly by the Storemen. The drainage system is flushed annually to ensure no build up occurs below ground.	2	2	4 (G)	
Hot box									
Heating of hot box	Energy use, discharge to air	2	3	6 (Y)	Natural gas use is monitored. Overarching contract carbon reduction plan is being developed. Regular maintenance carried out. Integrity testing of bulk tank carried out every 10 years.	1	2	2 (G)	
Plant breakdown during delivery	Discharge to watercourse, contamination of land	3	2	6 (Y)	Suppliers will be supervised by Infrastructure Services staff at all times during delivery. Should a fuel or oil spill occur the standard spill response process shall be implemented.	1	2	2 (G)	
Storage of plant and materials									
Oil storage not complying with Oil Storage Regulations	Contamination of land, discharge to watercourses, effect on ecosystems / human health	4	4	16 (R)	All potentially hazardous substances should be clearly labelled and stored appropriately in accordance with the Oil Storage Regulations.	3	2	6 (Y)	
Improper storage of chemicals	Contamination of land, discharge to watercourses, effect in ecosystems / human health	4	3	12 (R)	Ensure adequate and suitable storage is provided for hazardous chemicals. Staff and subcontractors should be made aware of risks associated with handling, storage and disposal of hazardous substances. Ensure COSHH assessment sheets are kept with substances where appropriate and clear instructions are visible indicating where staff can gain access to up to date COSHH information.	2	2	4 (G)	
Packaging	Creation of waste	1	5	5 (Y)	Ensure all packaging is disposed of in accordance with waste management processes. Request suppliers use minimal packaging where possible.	1	3	3 (G)	
Wastage of materials	Creation of waste	2	3	6 (Y)	Store materials in designated area. Protect materials from being damaged by the elements. Ensure that there is good access to the storage area to minimising damage.	1	2	2 (G)	
Storage of salt									
Failure to contain salt in adequate storage facility	Discharge to watercourse	5	3	15 (R)	Where possible, ensure that salt is not allowed to encroach onto the yard e.g., ensure regular sweeping occurs, regular inspections of stockpile for movement. Salt should be covered with sheeting where possible.	5	2	10 (Y)	
Exceedance of trade effluent consent limits	Discharge to watercourse	4	5	20 (R)	Drainage system to be flushed through regularly. Monthly foul water sampling to be conducted to ensure compliance with trade effluent consent from Thames Water.	4	4	16 (R)	

Storage & treatment of waste									
Improper storage of waste	Discharge to watercourses, emissions to air, contamination of land	3	3	9 (Y)	Ensure all waste is segregated and skips have adequate signage. Ensure all waste is removed by licenced carriers to permitted / exempt recycling or disposal facilities. Undertake regular Duty of Care inspections on waste contractors.	3	2	6 (Y)	
Uncalibrated weighbridge	Contamination of land, creation of waste	2	3	6 (Y)	Weighbridge is serviced/calibrated annually to ensure accurate measurement of wastes being received / transferred to / from depot.	2	2	4 (G)	
Poor management of waste transfer station / breach of Environmental Permit	Discharge to watercourses, contamination of land	3	4	12 (R)	Ensure all staff responsible for waste management activities are properly inducted and receive training as necessary.	3	2	6 (Y)	
Breach of S1 waste exemption	Discharge to watercourses, contamination of land	3	3	9 (Y)	Site inspections to check compliance against storage limits detailed in Figure 3. Carry out spot checks using waste data to check against storage limits.	3	2	6 (Y)	
Offices									
Use of office consumables	Use of resources, creation of waste	1	3	3 (G)	Ensure adequate supply of recycling facilities, promote responsible purchasing, promote use of recycling facilities	1	2	2 (G)	
Breakdown of office equipment	Creation of hazardous waste	5	1	5 (Y)	Ensure toner cartridges and florescent tubes are disposed of in accordance with waste management processes. Any WEEE waste should be stored on an impermeable surface with a weatherproof covering if containing hazardous materials or fluids.	5	1	5 (Y)	
Vehicle parking									
Fuel or similar spillage from parked cars	Discharge to watercourse or drainage	3	3	9 (Y)	Ensure drainage plans are up to date. Ensure all plant parked on site is regularly maintained. Provide spill kits. Ensure car park surface is impermeable through regular inspections.	3	2	6 (Y)	
Site lighting	Nuisance (lighting), energy use	2	2	4 (G)	As far as practicable site lighting will be angled down and in to the depot. Energy saving bulbs will be requested where possible. Site lighting will be turned off outside of working hours.	2	1	2 (G)	
Use of site roads	Discharge to air	2	4	8 (Y)	Hard standing areas are to be kept clean and free of debris. Road sweeper will attend to the depot as required. All vehicles and plant are to be regularly maintained. Vehicles will not be left idling. No fires are permitted.	2	2	4 (G)	
Daily operational activities	Nuisance (noise)	2	4	8 (Y)	Work shall only be carried out during stipulated working hours. No shouting. No excessively loud radios. Do not leave plant idling unless necessary. Do not leave plant running over night without permission from the Area Manager. Keep plant well maintained and fit plant with silencers, where appropriate. Keep Engine compartment shutters closed at all times.	2	1	2 (G)	

Maintenance of site perimeter	Effect in ecosystem	2	4	8 (Y)	No trees or part of the hedgerow may be removed without prior consultation of the Environment Team. Regular management of these hedges require is permitted without consultation of the Environment Team providing it is undertaken by depot staff outside of bird nesting season i.e., trimming should only be undertaken during September to mid-February (inclusive).	2	1	2 (G)
Failure of site drainage systems	Discharge to watercourse	4	5	20 (R)	Interceptors are emptied every 6 months and serviced annually. Drainage runs are to be marked up on site (Blue - Surface water drainage, Red - Foul water). Drainage system is flushed regularly to remove silt and organic matter.	4	3	12

Appendix K: Notification in the event of a Pollution Incident

Permit Number	
Name of Operator	
Location of Facility	
Time and Date of the detection	

A) Notification requirements for any malfunction, breakdown or failure of equipment or techniques, accidents, or emission of a substance not controlled by an emission limit which has caused, is causing or may cause significant pollution.

To be notified within 24 hours of detection

Date and time of the event	
Reference or description of the location of the event	
Description of where any release into the Environment took place	
Substance(s) potentially released	
Best estimate of the quantity or rate of release of substances	
Measures taken, or intended to be taken, to stop any emission	
Description of the failure or accident	

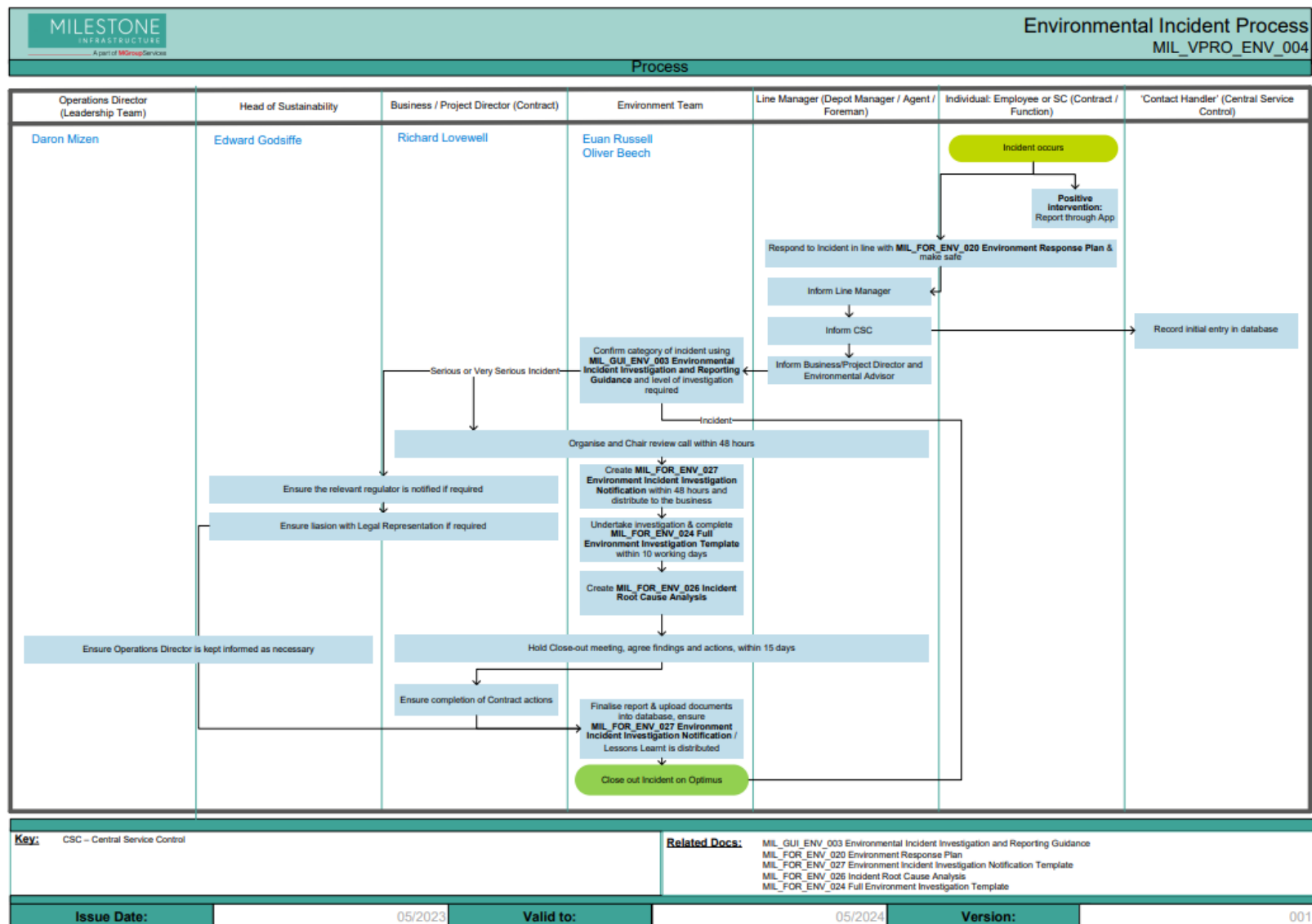
B) Notification requirements for the breach of a limit.

To be notified within 24 hours of detection unless otherwise specified

Emission point reference / source	
Parameter(s)	
Limit	
Measure value and uncertainty	
Date and time of monitoring	
Measures taken, or intended to be taken, to stop the emission	

Permit Number	
Name of Operator	
Location of Facility	
Time and Date of the detection	

Appendix L: Environmental Incident Process



Appendix M: Third Party Waste Activity Agreement Letter

Drayton Depot Third Party Waste Activity Agreement

Third parties working onsite at the Drayton Depot must work in compliance with the site's environmental permit (QP3899ED), the Depot Environmental Management Plan (DEMP) and the Contract Waste Management Plan (CWMP).

To ensure this, Oxfordshire County Council can only allow third parties to work onsite at Drayton Depot if they agree to adhere to the following provisions:

4. Oxfordshire County Council is the legal operator of any activities carried out at the Drayton Depot, including third party activities executed on the site. Oxfordshire County Council and the Drayton Depot Operational Team hold the right to oversee and control all third-party operations taking place at Drayton Depot on a day-to-day basis in order to ensure permit compliance, including stopping work activities if permit compliance or safety is felt to be at risk.
5. Third parties who wish to carry out a waste treatment activity onsite at Drayton Depot must review the depot's environmental permit, DEMP and the CWMP, and create a work plan that complies with these documents. The work plan must be submitted to representatives from the Depot Operations and Environment Teams to ensure it complies with the depot's environmental permit, DEMP and the CWMP. Only once the reviewed work plan has been approved can the start date for the work be arranged.
6. Any work carried out within Drayton Depot's non-permitted area must adhere to Drayton's DEMP and the CWMP. Any work carried out within Drayton Depot's permitted area must adhere to Drayton Depot's environmental permit, DEMP and the CWMP. Any third-party permits can also be used or followed provided that they do not conflict with Drayton Depot's environmental permit. If there is a conflict, the requirement in Drayton Depot's environmental permit, DEMP and/or SWMP will be the one followed.

By signing below, I confirm that I am able to sign this agreement on behalf of my organisation and that I agree on behalf of my organisation that work at Drayton Depot will meet these requirements.

Name:
On behalf of organisation:
Signature:
Date:

[illegible]

