

# Port of Wisbech

784-B059539

## Environmental Management System Summary

## Environmental Permit Application

**Port of Wisbech Limited**

**January 2025**

**Document prepared on behalf of Tetra Tech Limited. Registered in England number:  
01959704**



# DOCUMENT CONTROL

<b>Document:</b>	Environmental Management System Summary
<b>Project:</b>	Port of Wisbech
<b>Client:</b>	Port of Wisbech Limited
<b>Project Number:</b>	784-B059539
<b>File Origin:</b>	X:\784-B059539_Port_of_Wisbech_Permit\60 Project Output\61 Work in Progress\Management System Summary\Environmental Management System Summary.docx

<b>Revision:</b>	Draft	<b>Prepared by:</b>	Lauren Stanger
<b>Date:</b>	April 2024	<b>Checked by:</b>	Andrew Bowker
<b>Status:</b>	Draft to client	<b>Approved By:</b>	Andrew Bowker
<b>Description of Revision:</b>			

<b>Revision:</b>	Final	<b>Prepared by:</b>	Lauren Stanger
<b>Date:</b>	May 2024	<b>Checked by:</b>	Andrew Bowker
<b>Status:</b>	Final to EA	<b>Approved By:</b>	Andrew Bowker
<b>Description of Revision:</b>			

<b>Revision:</b>	Final	<b>Prepared by:</b>	Gemma Allan
<b>Date:</b>	January 2025	<b>Checked by:</b>	Andrew Bowker
<b>Status:</b>		<b>Approved By:</b>	Andrew Bowker
<b>Description of Revision:</b>	Amendments made to document as in line with the Request for Further Information notice.		

<b>Revision:</b>		<b>Prepared by:</b>	
<b>Date:</b>		<b>Checked by:</b>	
<b>Status:</b>		<b>Approved By:</b>	
<b>Description of Revision:</b>			

**TABLE OF CONTENTS**

---

**1.0 SITE OPERATIONS AND INFRASTRUCTURE ..... 1**

**2.0 ACCIDENT PREVENTION AND MANAGEMENT PLAN ..... 3**

**3.0 MANAGING STAFF COMPETENCE AND TRAINING RECORDS ..... 5**

**4.0 KEEPING RECORDS ..... 6**

**5.0 REVIEW OF MANAGEMENT SYSTEM..... 8**

**6.0 SITE CLOSURE ..... 9**

**7.0 ACCESS AND UNDERSTANDING ..... 10**

## 1.0 SITE OPERATIONS AND INFRASTRUCTURE

### 1.1 SITE PLAN

---

- 1.1.1 The management system will include a working plan drawn to scale, which details the phasing of the proposed operations and the layout of the site. This drawing will also include: -
- Site access;
  - Location of site infrastructure;
  - Storage facilities;
  - Entrances and exits;
  - Location of any discharge points;
  - Location of screening and storage mound (topsoil and subsoil); and,
  - Locations of acoustic screening and hedge planting.
- 1.1.2 A drainage plan will also be provided alongside the site layout drawing to identify the following: -
- The direction of flow of the water in the drain;
  - The location of discharge points to the sewer, watercourse or soakaway;
  - The location of manhole covers and drains; and,
  - The location of stop and diverter valves and interceptors.
- 1.1.3 In addition to the site's layout and infrastructure, there will also be a plan which identifies the location of any receptors that may be vulnerable to pollution as a result of the site's operations. This plan will be considered in connection to the Accident Prevention and Management Plan.
- 1.1.4 In accordance with Section 5 (Review of Management System), the site plan will be reviewed and may be amended if there are any changes to site operations that may affect the layout of the site. The plan may also be updated if there are any changes to nearby receptors.

### 1.2 SITE OPERATIONS

---

- 1.2.1 The management system will comprise documented procedures for all site operations in relation to start-up, normal operation and shut down. These procedures will also provide details of what measures will be undertaken in order to prevent or minimise the environmental risk from site operations.
- 1.2.2 All operational procedures will be reviewed on an annual basis as part of the management system (Section 5) and under the following circumstances: -
- After any accident, complaint, or breach of the Environmental Permit;
  - A need to amend procedures is identified following a near miss investigation;
  - A need to amend procedures is identified following an incident investigation;
  - Legislative requirements change resulting in a need to alter procedures; and,
  - Changes to site operations.

### 1.3 STORAGE PLAN

---

- 1.3.1 The management system will include a waste storage plan which includes the following: -
- The longest amount of time that each waste type will be stored and the criteria in place to ensure this is not exceeded;
  - The maximum volume of each type of waste to be stored on-site;
  - The maximum height of each storage pile on site;
  - How the operator will separate different types of waste where required; and,
  - Waste acceptance procedures to ensure the only the wastes within the permit are accepted on site.

### 1.4 FIRE PREVENTION PLAN

---

- 1.4.1 A Fire Response Procedure will be provided within the site's management system which details the mechanisms in place to prevent a fire on site alongside the procedure to be undertaken should a fire arise.
- 1.4.2 A Fire Prevention Plan has also been provided alongside the permit application which identifies the potential causes and effects of a fire and describes the measures that will be in place to prevent the occurrence of a fire at the site. In addition, the report provides details on the planned response to a fire incident and explain how fire water would be contained.

### 1.5 SITE EQUIPMENT AND MAINTENANCE PLAN

---

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

### 1.6 CONTINGENCY PLANS

---

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

## 2.0 ACCIDENT PREVENTION AND MANAGEMENT PLAN

- 2.0.1 The Accident Prevention and Management Plan will identify potential accidents that could arise from the site's operations, and the environmental consequences of those accidents. It will also provide details on how the operator will reduce the likelihood of accidents and indicates how the operator will respond should any such events occur.
- 2.0.2 The Accident Prevention and Management Plan will also include procedures to detail how incidents are recorded, investigated and responded to with corrective action. Also, in accordance with Section 4 (Keeping Records), PWL will maintain a record of all incidents, how the incident was investigated and any actions that were undertaken as a result of the incident.
- 2.0.3 The Accident Prevention and Management Plan will be reviewed on an annual basis and under the following circumstances: -
- After any accident, incident, or complaint;
  - Periodic review identifies an improved method of operation. The revised procedure will have a reduced or unchanged risk of impact upon safety, health and environment;
  - Legislative requirements change resulting in a need to alter procedures;
  - Changes to site operations that may affect the likelihood of accidents; and,
  - Changes to emergency contacts.

## 2.1 CONTACT INFORMATION FOR THE PUBLIC

- 2.1.1 Given that the proposed facility comprises a waste operation, a notice board will be situated at the site entrance which will include the following information: -
- The permit holder's name;
  - An emergency contact name and telephone number;
  - A statement that the site is permitted by the Environment Agency;
  - The permit number; and,
  - Environment Agency telephone number 03708 506506 and the incident hotline 0800 807060.

## 2.2 A CHANGING CLIMATE

- 2.2.1 As part of the review process (Section 5), PWL will consider whether the site's operations could be affected by a changing climate which may include the delivery of the site's Accident Prevention and Management Plan and Contingency Plans.

## 2.3 COMPLAINTS PROCEDURE

- 2.3.1 A complaints procedure will be incorporated into the site's management system to ensure that complaints will be handled by the operator to reassure the Environment Agency and the public that any of their concerns will be acknowledged and acted upon where appropriate. The procedure will be reviewed on an annual basis as part of the management system review (Section 5) or in the event of any significant complaints.

- 2.3.2 As mentioned in Section 2.1, a notice board will be situated at the site entrance which details the operator's and the Environment Agency's contact details. This will ensure that any member of the public can report their complaint and be confident that it will be received by the appropriate party even if they do not wish to discuss their complaint directly with the operator.
- 2.3.3 Any complaint that is received by the operator will be investigated in order to identify the cause of the complaint. Once established, necessary actions will be undertaken to prevent re-occurrence.
- 2.3.4 The operator will maintain a record of all complaints, how the complaint was investigated and any actions that were undertaken as a result of the complaint.

### 3.0 MANAGING STAFF COMPETENCE AND TRAINING RECORDS

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



## 4.0 KEEPING RECORDS

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

## 4.1 WASTE RECORDS

---

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

## 4.2 SITE CONDITION REPORT

---

- 4.2.1 A Site Condition Report was prepared by Tetra Tech on behalf of PWL for the site which is dated May 2024. This is provided as Appendix H of the Permit Application
- 4.2.2 The SCR provides an assessment of the site's current condition, including details of any past uses, historic pollution events and the environmental characteristics of the site.

- 4.2.3 The report concluded that whilst there may be potential for historical contamination prior to activities commencing on site, no significant breaches have been reported and no concerns have been raised by the EA since the land was purchased by the Operator in 2004. .
- 4.2.4 Following an incident on-site, a report will be produced to include details of the incidents, measures that were undertaken and the effectiveness of these measures to protect the land or groundwater. This information will demonstrate that the necessary measures were undertaken to avoid any pollution risk at the point the operator seeks to surrender the environmental permit.

## 5.0 REVIEW OF MANAGEMENT SYSTEM

### 5.1 DOCUMENT REVIEW PROCEDURES

---

- 5.1.1 The management system will be reviewed on an annual basis to ensure compliance with the relevant guidance and regulations. The management system will also be reviewed under the following circumstances: -
- After any accident, complaint or breach of the Environmental Permit;
  - After any changes made to the equipment and/or operational changes implanted on site that may impact site activities;
  - Changes to the site or operations that will require the Environmental Permit to be varied (changed); and,
  - If a new environmental problem or issue is encountered on site and a new control measure has been implemented.
- 5.1.2 The operator will maintain a record of any changes to the management system, including but not limited to the changes implemented following the circumstances listed above.

## 6.0 SITE CLOSURE

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

## 7.0 ACCESS AND UNDERSTANDING

- 7.0.1 Staff will have access to the sections of the management system which pertain to the activities which they undertake on-site. The management system will be made available online and a paper copy will be maintained on-site which is to be located in the site office to ensure accessibility for all staff.
- 7.0.2 In addition, the appropriate requirements (such as the Fire Prevention Plan) will be communicated to site operational staff on at least an annual basis via toolbox talks. Yearly refresher toolbox talks will ensure that the requirements of the EMS are reinforced.