



## EMS SUMMARY FOR PODE HOLE QUARRY

The effective management of environmental performance is a key requirement for ensuring that all pollution prevention and control techniques are delivered reliably, monitored and measured appropriately, and on an integrated basis. The Environmental Management System (EMS) helps to maintain compliance with regulatory requirements and to understand and manage all other significant environmental aspects and impacts.

PT-CE Ltd (PT-CE) is the company responsible for restoring Pode Hole, a former sand and gravel quarry. The quarry will be restored using inert materials accepted and placed under a Deposit for Recovery permit. As legal permit holder, PT-CE is required to have a written management system; a set of procedures describing what it will do to minimise the risk of pollution from the activities covered by the permit. PT-CE is committed to the care of the environment and the prevention of pollution while carrying out its activities. It operates in accordance with the Environmental Permitting (England and Wales) Regulations 2016, as amended (the EP Regulations) and specifically the conditions of its environmental permit issued by the Environment Agency. PT-CE seeks to minimise its impact on the environment through the implementation of an EMS. It has developed its own EMS for Pode Hole Quarry, developed in accordance with the Environment Agency's online guidance: Develop a Management System – Environmental Permits. This Management System specifies procedures designed to identify, minimise, control and mitigate risks of pollution arising from operations, maintenance, accidents, incidents, non-conformances and site closure and also from issues drawn to the attention of the operator through complaints and comments received by using sufficient competent persons and resources.

The EMS is a live document intended to be reviewed and updated at least every four years as a matter of routine and additionally after changes to operational practices, non-compliances, substantiated complaints and significant incidents. This process will ensure that the document will be continuously improved and that it will remain fit for purpose. Table 1 below provides a summary of the EMS and how it meets the Environment Agency's requirements.

**Table 1 – Environment Agency requirements for Environmental Management Systems from GOV.UK Guidance**

GOV.UK Requirements	Current / Proposed Arrangements	COMPLIANT?
<p>As part of the Environmental Management System guidance available on the GOV.UK website the following should be incorporated:</p> <p>You must include a <b>Site Infrastructure Plan</b> which highlights where the activities covered by an Environmental Permit are undertaken.</p> <p>Your plan must also include:</p> <ul style="list-style-type: none"> <li>▪ Buildings and other main constructions such as treatment plants, incinerators, storage silos and security fencing;</li> <li>▪ Storage facilities for hazardous materials like oil and fuel tanks, chemical stores, waste materials;</li> <li>▪ Locations of items for use in accidents and emergencies;</li> <li>▪ Entrances and exits to be used by emergency services;</li> </ul>	<p>As part of PT-CE's EMS, the Site Manager maintains all necessary documents for operational planning and control for this site. This includes site infrastructure plans illustrating the identified requirements. Specifically, Section 5 (Appendices) of the EMS for Pode Hole Quarry contains drawings including the relevant information.</p>	<p>YES</p>

GOV.UK Requirements	Current / Proposed Arrangements	COMPLIANT?
<ul style="list-style-type: none"> <li>▪ Pollution control points, such as inspection and monitoring points;</li> <li>▪ Trade effluent or sewage effluent treatment plants;</li> <li>▪ Effluent discharge points; and</li> <li>▪ Contaminated land, or land you believe is contaminated.</li> </ul> <p>The plan must also demonstrate areas which are vulnerable to pollution from the site. Such as rivers and streams; groundwater sources; residential, commercial or industrial premises; protected wildlife.</p> <p>Your plan must show foul and combined drainage facilities marked in red and surface water drainage facilities in blue. It must also show:</p> <ul style="list-style-type: none"> <li>▪ The direction of flow of water in the drain;</li> <li>▪ The location of discharge points to sewer, watercourse or soakaway;</li> <li>▪ The location of manhole covers and drains; and</li> <li>▪ The location of stop and diverter valves and interceptors.</li> </ul> <p>Your plan must show the location of mains water, gas and electricity supplies on your site including:</p> <ul style="list-style-type: none"> <li>▪ The mains water stop tap;</li> <li>▪ Gas and electric isolating valves and switches; and</li> <li>▪ The routes for gas, electricity and water supplies around the site.</li> </ul> <p>If your permit covers a standalone water discharge activity or point source standalone groundwater activity, your site plan must show:</p> <ul style="list-style-type: none"> <li>▪ Your wastewater treatment plant;</li> <li>▪ Monitoring points;</li> <li>▪ Locations of emergency equipment;</li> <li>▪ Location of any mitigation measures referred to in your management system;</li> </ul>	<p>The relevant elements of a drainage plan will be included in the EMS.</p> <p>The relevant utility supplies will be included on a plan in the EMS.</p> <p>N/A as the permit application does not include a standalone water discharge activity or point source standalone groundwater activity.</p>	

GOV.UK Requirements	Current / Proposed Arrangements	COMPLIANT?
<ul style="list-style-type: none"> <li>▪ The outlet to surface water; and</li> <li>▪ The infiltration system (standalone groundwater activities only).</li> </ul>		
<p><b>Site Operations</b></p> <p>List the operations that will be carried out on your site during start up, normal operation and shut down.</p> <p>For waste, mining waste, and installations, list the wastes that will be produced by each activity or process.</p> <p>List the steps you will take to prevent or minimise risks to the environment from each activity or process and type of waste.</p> <p>If you are a waste operator you must include a waste storage plan that states:</p> <ul style="list-style-type: none"> <li>▪ The longest amount of time you will store each type of waste;</li> <li>▪ How you will make sure you will not exceed these time limits;</li> <li>▪ The maximum amount of each type of waste you will store in terms of volume;</li> <li>▪ The maximum height of each storage pile on site;</li> <li>▪ How you will identify the specific types of waste you are storing;</li> <li>▪ How you will separate different types of waste if required; and</li> <li>▪ How you will make sure your site only takes waste that your permit allows you to store.</li> </ul> <p><b>Fire Prevention Plans (FPP)</b></p> <p>If you need a permit for waste activities and you plan to store combustible waste you will need to write a fire prevention plan and submit it with your application. This must explain how you would prevent fire at your site or manage risks from fire if one occurs.</p>	<p>The EMS identifies all of the activities that are currently undertaken at the quarry. All significant environmental aspects and impacts associated with site operations are detailed in the EMS. Specifically, Section 2 (Operations) of the EMS covers operations with regard to the permitted activities, the legal site boundary, operating techniques (including the approved Waste Recovery Plan), waste acceptance and site engineering.</p> <p>PT-CE will only accept inert material which will be subject to a waste recovery activity (i.e. permanent deposit) for the restoration of a quarry, so no waste will be exported from site. Therefore, a specific waste storage plan is not required. However, should any storage of material be required before it is deposited in the quarry, the secure storage of wastes authorised by the permit will take place in designated areas (as shown on the Site Layout Plan in Section 5 (Appendices) of the EMS) and storage will be limited to 3 years prior to the recovery of such waste.</p> <p>Section 5 (Appendices) of the EMS includes the Waste Acceptance Procedure to ensure that the site only takes waste authorised by the permit.</p> <p>PT-CE will only accept inert wastes comprising non-combustible materials which will be strictly controlled by waste acceptance procedures. A Fire Prevention Plan is therefore not required. However, Section 5 (Appendices) of the EMS includes an Environmental Risk Assessment and an Accident Prevention and Management Plan, both of which consider the risk of fire or explosion.</p>	<p>YES</p>

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<p>You will need to produce a <b>Site and Equipment Maintenance Plan</b> detailing how you will maintain the site infrastructure and any machinery.</p>	<p>PT-CE will maintain a Maintenance Checklist as part of the Integrated Management System.</p> <p>Section 5 (Appendices) of the EMS includes a Maintenance Checklist which details plant items which require maintenance and the frequency at which this should be undertaken to ensure equipment is kept operational and in good working order. All plant and equipment will be maintained in accordance with manufacturers' recommendations.</p>	<p>YES</p>
<p>You will need <b>Contingency Plans</b> to demonstrate how you minimise the impact on the environment of any:</p> <ul style="list-style-type: none"> <li>▪ Breakdowns;</li> <li>▪ Enforced shutdowns; and</li> <li>▪ Any other changes in normal operations.</li> </ul> <p>A changing climate and how this could affect your operations should also be considered as part of contingency planning.</p>	<p>Section 5 (Appendices) of the EMS includes a Contingency Plan, which outlines the procedures and actions to be taken in the event of circumstances affecting normal operations. The potential emergency situations include severe weather events (e.g., flooding and storms) due to a changing climate, breakdowns and shutdowns and damage to key equipment (e.g., fencing and weighbridge).</p>	<p>YES</p>
<p>You will need an <b>Accident Prevention and Management Plan</b> which details how you would deal with any incidents or events that could result in pollution. This plan must:</p> <ul style="list-style-type: none"> <li>▪ Identify any potential accidents or other unexpected incidents which could cause an unexpected change to normal operations.</li> </ul> <p>For each potential incident the following must be stated:</p> <ul style="list-style-type: none"> <li>▪ Likelihood of the accident happening;</li> <li>▪ Consequences of the accident happening;</li> <li>▪ Measures taken to avoid the accident from happening; and</li> <li>▪ Measures to minimise any impacts if the accident happens.</li> </ul> <p>The plan must say how you will record, investigate and respond to accidents or breaches of your permit.</p> <p>It must also include:</p>	<p>Section 5 (Appendices) of the EMS includes an Accident Prevention and Management Plan (APMP) which considers a range of incidents and events including:</p> <ul style="list-style-type: none"> <li>▪ Personal injury</li> <li>▪ Fire or explosion</li> <li>▪ Liquid spillage</li> <li>▪ Damage to Property</li> <li>▪ Unauthorised Waste delivery</li> <li>▪ Flooding (containment failure)</li> <li>▪ Severe weather</li> <li>▪ Power failure/breakdown</li> </ul> <p>The APMP identifies the:</p> <ul style="list-style-type: none"> <li>▪ Potential impact on the environment or the local population</li> <li>▪ Likelihood and consequence of an event occurring</li> <li>▪ Risk management measures to reduce the likelihood and consequences of a potential event</li> <li>▪ Control measures (emergency response)</li> </ul>	<p>YES</p>

GOV.UK Requirements	Current / Proposed Arrangements	COMPLIANT?
<ul style="list-style-type: none"> <li>▪ Date last reviewed;</li> <li>▪ Date of next review;</li> <li>▪ A list of emergency contacts and how to reach them;</li> <li>▪ A list of substances stored on site and storage facilities; and</li> <li>▪ Forms to record accidents on.</li> </ul>	<p>The APMP will regularly reviewed and updated where necessary, at least once every 2 years. All incidents and actions taken to minimise the impacts will be recorded to prevent a reoccurrence in the future. Near Misses / Incidents / Accidents will be reported and recorded in full.</p> <p>Section 5 (Appendices) of the EMS also includes an Environment Agency and Emergency Contact list and an Accident / Incident Report Form.</p>	
<p><b>Online security: protect your business</b></p> <p>You can take some simple steps to protect your business against online security threats. Good online security will help make sure your business does not cause pollution. Any pollution that does occur is your responsibility as the permit holder.</p> <p>See the <a href="#">National Cyber Security Centre website</a> for guidance about online security.</p>	<p>The EMS contains online security procedures which are in line with the guidance provided on the National Cyber Security Centre Website. Measures include:</p> <ul style="list-style-type: none"> <li>▪ Basic access controls</li> <li>▪ Up-to-date software and devices</li> <li>▪ Protection against malicious emails</li> <li>▪ Secure storage and back-ups</li> <li>▪ Safe use of laptops and remote access</li> <li>▪ Ongoing review of security arrangements</li> </ul>	YES
<p><b>Contact Information for the Public</b></p> <p>A noticeboard is to be displayed at the site entrance including the following information:</p> <ul style="list-style-type: none"> <li>▪ Permit holder’s name;</li> <li>▪ Emergency contact name and telephone number;</li> <li>▪ Statement to show the site is permitted by the Environment Agency;</li> <li>▪ The permit number; and</li> <li>▪ EA contact number and incident hotline number.</li> </ul>	<p>PT-CE displays a noticeboard at the Pode Hole Quarry site entrance detailing the required information. It clearly states the site name, that ‘all visitors and drivers must report directly to the weighbridge office’, and ‘no unauthorised access’. The sign also details that ‘This site is permitted by the Environment Agency’, with an EA general enquiries phone number provided, an incident hotline number provided and other general information including name of permit holder, weighbridge telephone number, security (out of hours) number, an emergency contact number the environmental permit number.</p> <p>The site contact details, emergency contact details and EA contact details are also provided in Section 5 (Appendices) of the EMS.</p>	YES
<p><b>A changing climate</b></p> <p>If your permit was issued:</p> <ul style="list-style-type: none"> <li>▪ On or after 1 April 2023, you need to integrate climate change</li> </ul>	<p>Section 5 (appendices) of the EMS includes climate impacts tools to establish how the climate is due to change by the year 2050. This is used to inform a Climate Change Risk Assessment where required.</p>	YES

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<p>adaptation planning into your management system; or</p> <ul style="list-style-type: none"> <li>▪ Before April 2023, whilst your management system should already consider climate impacts, you need to complete a climate change adaptation risk assessment by 1 April 2024.</li> </ul>		
<p>You need a <b>Complaints Procedure</b> to record:</p> <ul style="list-style-type: none"> <li>▪ Any complaints received in relation to the activities covered in your permit;</li> <li>▪ How complaints are investigated; and</li> <li>▪ Any actions taken as a result of complaints.</li> </ul>	<p>Section 5 (Appendices) of the EMS includes a 'Complaints procedure &amp; Complaints log' which gives details on steps to log complaints, action and resolve them. Complaints are also recorded in the Site Diary and are specific item for review on the Environmental Permit Audit Sheet.</p>	YES
<p>Include details in the management system on <b>Staff and Resources</b> including:</p> <ul style="list-style-type: none"> <li>▪ An explanation of who is responsible for what procedures;</li> <li>▪ Technical competency records;</li> <li>▪ A list of roles carried out in relation to activities covered in the permit and by whom; and</li> <li>▪ Competency check procedure and training records.</li> </ul>	<p>The EMS includes information on staff and resources, including roles and responsibilities. Section 1 (Management) of the EMS confirms that the Site Diary will be used to record the attendance of the site's Technically Competent Manager who shall comply with the requirements of the WAMITAB/CIWM competence scheme. Continuing competence will be demonstrated by such individuals through the WAMITAB/CIWM Continuing Competence Scheme.</p> <p>A certificate a competence is available for team members of site such as Paul Taylor (Technically Competent Manager) who was awarded LS4, Level 4 managing landfill operations : special waste and 4TMH, Level 4 in waste management operations – managing treatment hazardous waste.</p> <p>In addition, all staff will be assessed for competence and records of training and competency will be held electronically and updated as staff receive additional training.</p> <p>Section 5 (Appendices) of the EMS includes a Training Matrix for the site. This details specific roles, such as Director, Site Manager, Site Administrator and TCM, and records the dates of relevant training received. Note: the matrix in the EMS appendix identifies examples of training only; it is maintained as a live document (electronically) for</p>	YES

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	each staff member and is amended based on organisation and job needs.	
<p><b>Record Keeping</b></p> <p>Any records required by your permit must be kept.</p> <p>You must keep records to show how your management system is being implemented.</p> <p>Records to be kept include:</p> <ul style="list-style-type: none"> <li>▪ Permits issued to the site;</li> <li>▪ Legal requirements;</li> <li>▪ Risk assessment;</li> <li>▪ Management system plans;</li> <li>▪ Any other plans required by your permit (such as noise);</li> <li>▪ All operating procedures;</li> <li>▪ Staff competence and training;</li> <li>▪ Emissions and any other monitoring undertaken;</li> <li>▪ Compliance checks, investigation findings and actions taken;</li> <li>▪ Management reviews and changes made to the management system; and</li> <li>▪ Certification audit reports and any actions taken.</li> </ul> <p><b>Waste Operators</b> must also record the following for each waste delivery to the site:</p> <ul style="list-style-type: none"> <li>▪ Quantity (weight or volume);</li> <li>▪ LoW code;</li> <li>▪ Origin of the waste;</li> <li>▪ Producer identity of the waste;</li> <li>▪ Date of arrival of waste to site;</li> <li>▪ Date when the waste was produced;</li> <li>▪ Quarantined materials as part of the delivery;</li> <li>▪ Duty of Care records; and</li> </ul>	<p>Environmental records and documents are stored online and/or in the Site Diary, depending on the nature of the record.</p> <p>A copy of the Environmental Permit and this EMS will be displayed in the Site Office enabling any member of staff having duties that are or may be affected by the matters set out in the Permit to have convenient access to a copy of the document.</p> <p>Appendices to the EMS comprises a bespoke Environmental Risk Assessment that details design elements and mitigation measures to enable the risk of pollution from the Permitted activities to be categorised as low. An Accident Prevention and Management Plan which details the responses required by staff members to minimise risks of pollution from a range of potential incidents. A procedure for handling and logging complaints – Complaints Procedure &amp; Complaints Log.</p> <p>The Site Office Administrator will record the start and finish time of Permitted activities in the Site Diary for each day of operation. This individual or authorised deputy will maintain a register of individuals present on site for each working day. The Register will be kept in the Site Control Office.</p> <p>The Site Diary will be used to record the attendance of the site’s Technically Competent Manager who shall comply with the requirements of the WAMITAB/CIWM competence scheme. Continuing competence will be demonstrated by such individuals through the WAMITAB/CIWM Continuing Competence Scheme.</p> <p>Section 4 (Information of the EMS) confirms that the Weighbridge Operator, as delegated by the Site Manager, is responsible for completion of records required by the permit. The site’s computer database includes a template for recording wastes accepted for recovery, including the quantity, characteristics, date of delivery, origin, carrier and producer.</p> <p>Templates for other records are included in Section 5 (Appendices) of the EMS, including rejected loads, accidents/incidents, maintenance, site diary</p>	<p>YES</p>

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<ul style="list-style-type: none"> <li>▪ Compliance with the site record and return requirements for hazardous waste.</li> </ul> <p>If you hold a permit for waste, mining waste or installations, a <b>Site Condition Report</b> is required.</p> <p>This must detail the condition of land or groundwater on the site and be kept updated regularly. The following information is to be included:</p> <ul style="list-style-type: none"> <li>▪ Details of historic spills or contamination and responses to these incidents; and</li> <li>▪ Evidence of the effectiveness of any measures taken to protect land and groundwater.</li> </ul>	<p>entry list, daily inspection record sheets, audits, training and complaints.</p> <p>Documents associated with the permit will be retained in accordance with the requirements of the Environmental Permit when it is issued and in accordance with legal requirements.</p> <p>PT-CE maintains records to demonstrate compliance with waste management regulations, containing the information detailed opposite and the following:</p> <ul style="list-style-type: none"> <li>▪ Environmental Permit Documentation</li> <li>▪ Site-Specific Information (including Environmental Setting and Site Design Report and Risk Assessments)</li> <li>▪ Waste Acceptance and Classification Records</li> <li>▪ Construction and Engineering Records</li> <li>▪ Monitoring and Control Records</li> </ul> <p>There are no closure processes or aftercare requirements for deposit for recovery operations.</p> <p>As part of the permit application, a site condition report has been produced which presents the environmental setting of the site including, the local geology, surface waters and flooding and hydrogeology. Details on the existing pollution history and contamination is also included. Plans for the site and environment risk assessments have also been produced to protect the land and groundwater.</p>	
<p><b>Review Management System</b></p> <p>A procedure needs to be in place for checking you are complying with permit conditions and management system requirements.</p> <p>The management system is to be reviewed and updated when:</p> <ul style="list-style-type: none"> <li>▪ Changes are made to the site, operations, or equipment that affect activities covered by your permit;</li> <li>▪ If you apply to change / vary your permit;</li> <li>▪ After an accident, complaint or breach of your permit; and</li> </ul>	<p>The management system will be subject to regular review.</p> <p>Section B (General information) of the EMS details that the EMS is a live document intended to be reviewed and updated at least every four years as a matter of routine and additionally after changes to operational practices, non-compliances, substantiated complaints and significant incidents.</p> <p>This process will ensure that the document will be continuously improved and that it will remain fit for purpose.</p> <p>The EMS and any relevant Risk Assessments / Operating Procedures will also be reviewed following an accident / incident that results in a pollution event or a near miss that could have resulted in a pollution event.</p>	YES

<b>GOV.UK Requirements</b>	<b>Current / Proposed Arrangements</b>	<b>COMPLIANT?</b>
<ul style="list-style-type: none"><li>▪ If a new environmental issue is encountered and new control measures are implemented.</li></ul> Changes made to the management system will be recorded.	Any changes to the EMS will be recorded in the relevant documentation.	