

Twyford Recycling Limited

ENVIRONMENTAL POLICY STATEMENT

Our core business is tyre recycling. This involves storing, treating by baling and shredding used vehicle tyres for recycling purposes. It is our aim to improve the local and global environment in which we operate, and to prevent pollution of the environment.

We are committed to compliance with all relevant legislation, regulations and other industry codes. As an integral part of this commitment, we will ensure that all emissions to water, land and air are within regulatory constraints and to strive to minimise the effect we have upon the environment through our commitment to continual improvement.

It is our policy to promote environmental awareness throughout the company and to ensure that operatives receive appropriate training relating to environmental issues.

Clients of Twyford Recycling Limited will be made aware of the Company's Environmental Policy.

It is an integral element of our policy to ensure open and clear communication of our objectives and achievements to all interested parties.

We have a commitment to monitoring our performance with regard to environmental issues, and the subsequent performance improvements. Regular objectives will be set and reviewed by Company's management

Signed.....Gerry Harkin. May 2021.

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INTRODUCTION

This manual and associated Procedures represents the formal Environmental Management System (EMS) for Twyford Recycling Limited.

This system has been documented to achieve and demonstrate sound environmental performance by controlling the impacts of the company's activities on the environment consistent with our policy. The EMS supports compliance with the Environmental Permit operated at the site.

Company Profile

Twyford Recycling Limited is a registered waste tyre handler and dealer. The business operates from Plot F, Appledram Business Park, A27 by pass, Chichester, PO19 8FH and operates predominantly as a tyre recycling facility.

Site operating hours are as follows:

- o Monday to Friday: 0700 to 17.30;
- o Saturday: 0700 to 13.00; and
- o Sunday / Bank Holidays: Closed.

Scope of System

The scope of our environmental management system covers "The recycling of tyres".

The purpose of this manual is to define the EMS, which will ensure that the company activities are conducted in a manner which will minimise adverse environmental impacts and enhance our role in environmental stewardship.

The procedures that implement the EMS apply, where appropriate, to the company activities at Twyford Recycling Limited and are operated under the same common management system.

Environmental Risks and Effects

The company has identified and documented its Environmental aspects and Impacts below to identify the environmental aspects of the activities and determine those which have, or may have, a significant impact on the environment. Where necessary operational controls have been implemented to minimise any potential impact on the environment.

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Legal and Other Requirements

The key legislation and other requirements which establish the main environmental control over the company's activities are defined within the Register of Environmental Legislation. Where appropriate, operational controls have been implemented to ensure compliance with relevant legislation.

Environmental Improvement Programme

Objectives and Targets, with defined responsibilities for their monitoring, achievement and timescales have been documented:

Environmental Objectives will be established on an annual basis taking into account:

- The Environmental Policy;
- The significant environmental aspects based on the Risk Assessment;
- Results of the Audits;
- Legislative and other requirements; and
- Views of relevant stakeholders.

Operation & Maintenance

Operations and activities associated with environmental aspects are controlled by operational procedures referenced in this manual.

Twyford Recycling Limited shreds and bales tyres only. Metal is not received on site and is first cut shred. No metal is stored on the site.

Tyres are shredded within a few hours of arriving at the site and then stored in the shred firebay. Tyres are not allowed to accumulate or stand on site for any length of time.

Site Plant details:

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- 1 x diesel FLT - diesel – 2500l bunded tank
- 1 x tyre baler
- 1 x telehandler
- 1x granulator
- 1x shredder – max capacity (not necessarily run at) 10t/hr. 6 =5m x 4m high. Located next to the office as per Annex A. Shredded material goes straight into a conveyor then bagging station.
- Shredding activities take place on the external yard. For mechanical treatment the following considerations are given:
- Vehicles/plant are used daily and an ongoing check is made as to exhaust and hot areas as potential combustion sources.
- All equipment inspected & maintained under PUWER¹ requirements
- Mobile plant parked remotely, secured and key out when site closed (See Fire Risk Daily Checks Form Annex F)
- Trained staff operate equipment
- Mobile plant is stored at least 6m away from combustible waste when not in use.
- Fire extinguishers fitted, equipment switched off when not in use, parked in remote area of site when not in use, keys safely stored

Accidents and Incidents

The Company has established and maintains a procedure for incident and accidents in section 1.7 of this manual.

Non-conformance, Incidents and Complaints

The Company has established and maintains a procedure for recording Non-conformance, incidents and Complaints in section 1.8 of this manual.

¹ Provision and Use of Work Equipment Regulations 1998 (PUWER)

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Environmental Risk Assessment

The risk assessment below constitutes the typical risks present at Twyford Recycling Limited and identifies generic risks which are deemed to be applicable to the business activities of the company.

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Hazard	Receptor	Pathway	Risk management	Probability of exposure	Consequence	What is the overall risk?
Smell from storage of waste .	Adjacent businesses on Appledram business park	Air – South Westerly winds or lengthy periods of calm.	Ensure storage vessels are regularly checked and maintained in accordance with the procedures	Very low	Annoyance or nuisance to Adjacent businesses on the industrial park especially during warm summer months. Probably of limited duration.	Very low
Noise from the machinery on-site FLT's etc	Adjacent businesses on Appledram business park	Air - Activities on site are potentially audible at other properties particularly gardens (no nearby residents) if any in the vicinity	Ensure activity undertaken in accordance with operating procedure Activity location benefits from being in an industrial setting area with no immediate residential properties nearby	Medium	Annoyance or nuisance to Adjacent businesses on industrial park especially during warm summer months.	Low
Spillages of liquids or contaminated rainwater runoff from metals storage or leaking from tanks or storage vessels	Groundwater	Indirect run-off through the soil layer, through current unmade ground. Site drains to sump	Bunded, impermeable base in yard. Ensure regular inspections of impermeable surface and repair of damaged areas. No storage vessels in permitted area Regular inspections of bunds and tanks and waste storage areas. Storage area is hardstanding	Low	Contamination of groundwater	Very Low

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			and drains to sewer.			
Arson or vandalism causing the release of pollution material to air, water or land	Adjacent businesses on industrial park	Air transport of smoke or spillages and contaminated firewater by direct runoff from site.	Gates are closed and locked outside of office hours to block access further. Regular checks of the Perimeter and gates The premises is secured by fencing. Only one entrance/ exit point to the site to/ from the public highway is in place, which is secured by means of lockable metal gates to be locked shut at any time the site is left unattended.	Low	Harm to health respiratory irritation Pollution of water via off site surface water drainage or adjacent land. Vandalism.	Low
Flooding of site	Adjacent businesses on industrial park	Flood waters, breach of canal	The site is not in a floodplain All storage vessels have secondary containment Ensure regular checking of and emptying of underground tank and sump. Ensure onsite drains are kept clear	Medium	If waste is washed off the site it goes to sump. No liquid waste or waste oils kept on site.	Medium
Discharges to surface water	Surface water and	Bale storage is a sealed drainage	In times of heavy rainfall the S/W from the yard/road areas	Medium	Overflow or back up from	Low

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from storage areas	nearby drains	system	may flow into the S/W drains. This water will not be in contact with waste. Yard areas and gulleys will be checked on a monthly maintenance regime		the sump	
sump blocked and sitewater backing up	Blind sump	Overflow from main site to S/W gullies	In times of heavy rainfall the S/W from the yard areas may flow into the S/W drains or ditches in the perimeter or overflow from the sump area may back up into the yard. Yard areas and gulleys will be checked on a monthly maintenance regime	Medium	Overflow or back up from the sump to yard may enter S/W gullies on site	Medium

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1.4 Legal Register

Legislation	Relevance	Applicable to which processes	Where held?	Person responsible for compliance
Environmental Permitting (Amendment) Regulations 2012	The site requires an environmental permit to operate. Environmental permitting is a risk-based regime for regulating business activities that could have an impact on the environment or human health.	Storage, handling and treatment of waste on the site	Copy held in site office	Owner
Environmental Protection Act 1990 (Part II & Part III)	Defines the legal framework for duty of care for waste, and statutory nuisance.	The transfer of waste from site and the impact of operations on neighbouring residents.	Copy held in site office	Owner
Provision and Use of Work Equipment Regulations 1998 (PUWER)	Establishes requirements for those owning and controlling equipment used at a work's premises	hydraulic grab	Copy held on site	Owner

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Legislation	Relevance	Applicable to which processes	Where held?	Person responsible for compliance
Lifting Operations and Lifting Equipment Regulations 1998 (LOLER)	Establishes requirements for companies operating and owning lifting equipment	Lifting of scrap metal	Copy held on site	Owner
Health & Safety at Work Act 1974	Establishes requirements for risk assessment for those working in potentially hazardous conditions	Working close to machinery Operating machinery	Copy held on site	Owner
Waste Framework Directive 2008/98/EC	Lays down controls for the safe disposal and recovery of waste. Article 13 lays down the objective that waste is recovered or disposed of without endangering human health and without using processes or methods that could harm the environment.	All site storage handling and treatment of waste on site.	Copy held in site office	Owner

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Legislation	Relevance	Applicable to which processes	Where held?	Person responsible for compliance
Control of Pollution (Oil Storage) (England) Regulations 2001	Applies where oils including (petrol, diesel, mineral oils) are stored on site in containers larger than 200 litres	Operation of equipment for materials handling on site	Copy held in site office	Owner
The Hazardous Waste Regulations 2005 (as amended)	Ensures that Hazardous waste is tracked from the point of productions to the final point of disposal or recovery	Storage and transfer of specific wastes from those operations and which wastes cannot be accepted at site	Copy held in site office	Owner
The List of Wastes Regulations 2005	Contains a harmonised list of hazardous and non-hazardous wastes	The operator needs to understand the properties of the wastes produced on site to ensure safe and secure storage and handling.	Copy held in site office	Owner
Waste (England & Wales) Regulations 2011	Duty of care requirements and information required on a waste transfer note	Handling, storage and transfer of Waste	Copy held in site office	Owner

1.5 Site Objectives

Twyford Recycling Limited aims to operate in a way that minimises pollution to the local environment and does not pose a threat to any of our immediate neighbours by way of pollution, noise or disturbance. Further quantified objectives will be documented after the first year of operation of this EMS.

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1.6 Operational Control

Twyford Recycling Limited has developed a number of operational control procedures by which it undertakes its operations. These are listed here

- Firewater management –
- Noise management –
- Mud & Dust -
- Spills and incidents –
- Dealing with Floodwater –
- Plant & vehicle maintenance –
- Site Inspection & neighbourly relations –
- Drain & Bund checks –
- Site Plan –
- Sealed Drainage System -
- Tyre Processing –
- Waste Storage

1.7 Incidents and Accidents

The following table references other procedures and responsibilities in the event of an emergency situation
Reference to the appropriate procedure will give further guidance.

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No	Activity	Responsibility	Documentation
1	<p>The following plan and associated supporting documents should be adhered to in the event of any of the following environmental accidents or incidents:</p> <ul style="list-style-type: none"> • Failure of any storage tanks; • Overfilling of vessels; • Accidental fire causing release of smoke and fumes; • Arson or vandalism causing the release of pollution material to air, water or land; and • Flooding of site. 	Owner and all members of staff	<ul style="list-style-type: none"> • Spillage Response procedure; • Fire Response Procedure; • Accident and Incident Management Plan; • Site Plan; • Flood response • Key Site and Emergency Contacts; • List of PPE; and • Accident and Incident Record.

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1.8 Incidents and Complaints

No	Activity	Responsibility	Documentation
1	In the event of a complaint made to the site, the complaint record must be completed, and record kept	Owner	Complaint Record
2	Site Diary	Owner	Site Diary. A daily record of unusual or abnormal events will be kept in the form of a diary which will cover the whole site.

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1.9 Training & Awareness

Currently one member of staff is considered technically competent. They are Mr Gerry Harkin who holds WAMITAB registration. They must ensure their presence on the site exceeds 30% of the working week.

The identity of site technically competent management has been made known to all site staff.

Management will make a record of training received by site staff, to be kept for as long as the person is employed at the site

More than one operative will be trained/ available to the site, so that holiday, sickness or other absence can be covered, allowing materials & metal recycling to continue in a manner that will not cause the site to become in breach of any licence or regulations condition relating to permitted activities. Training and Awareness of all requirements in the environmental permit and this EMS will be give to all staff within 6 months of grant of permit.

2.0 Management Review

Twyford Recycling Limited will review and audit the contents of this EMS at no longer than yearly intervals. The review will take into account changes to the business, legislation and best practice. The system will be updated as necessary to drive continuous environmental improvement.