

Environmental Management System



Royal Preston Hospital

Sharoe Green Lane, Fulwood, Preston, PR2 9HT.

July 2023

Ref: RPH.PT.EMS.2307.v2

AC Environmental Consulting Ltd.

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This Environmental Management System is for the Royal Preston Hospital site at Sharoe Green Lane,

Fulwood, Preston, PR2 9HT.

The Environmental Management System comprises this description of site operations and the Site

Working Procedures Manual.

1. LOCATION

The permitted area is located within a larger site consisting of hospital buildings situated in an urban

setting. The larger hospital site is surrounded by residential housing. The nearest residential housing

is approximately 100m to the southeast. The site will accept up to 1,750 tonnes of clinical waste per

annum. The average weekly tonnage will be 34 tonnes.

At present, the site is operating as a clinical waste and healthcare transfer station under the permit

Ref: ZP3191CY/V002. The site is now seeking to be granted a new bespoke permit for the clinical waste

transfer station, as the site is accepting clinical waste from Trusts outside the Royal Preston Hospital.

The Air Quality Management Area (AQMA) map from DEFRA has been checked and the site is not

located within an AQMA. The site is located within a Flood Zone 1, indicating that the land is assessed

as having a 1 in 1000 or greater annual probability of river flooding (<0.1%).

2. HISTORY

Reference to historical IOS maps indicate that the site was open fields and open land from 1891 until

approximately 1955 where the site began to be developed into a GP. The Royal Preston Hospital was

then built in 1983 and has been used for such purposes ever since.

3. OPERATING HOURS

The permitted area accepts customer waste during the following hours:

Monday - Friday: 08.00 - 15.00

Saturday – Sunday: No customer waste received.

The permitted area accepts own waste during the following hours:

Monday – Sunday: 24/7

4. SITE DESIGN

4.1 Design

The site layout is designed to ensure freedom of movement. The site is fully concreted with an impermeable concrete surface. Customer waste is brought onto site using a variety of customer's own vehicles including Luton vans and transit vans. The hospital's own waste is transferred to the area using Luton vans or electric tugs. There are no vehicles stored on site out of hours. Waste accepted on site will originate from the hospital itself and other small businesses in the Lancashire area. The site accepts six different waste streams consisting of offensive waste, sharps waste, infectious waste, cytotoxic/cytostatic waste, medicine waste and anatomical waste. Each waste stream is clearly identified by the type of waste bag/container it is stored in, as well as the bin tag.

The site is designed to accept a maximum of 1,750 tonnes of clinical waste per annum which demonstrates that such handling is tightly controlled, and waste will be on site for no longer than 7 days.

External waste will be received and immediately loaded into 770 litre wheeled bins. Trust waste will already be contained within 770 litre wheeled bins. The bins are moved to the weigh scales which are under cover to the north of the permitted area to be weighed. Once weighed, each wheeled bin of waste is labelled with the appropriate bin tag indicating source, weight, date, and waste type.

It is crucial to note that all of the 770 litre wheeled bins are clearly labelled with the type of waste stream they are assigned for. Each wheeled bin is locked and accessed by the use of a bin key. Once opened and the waste stored inside, each wheeled bin is equipped with an automatic closing and locking mechanism, and therefore the waste will have very little exposure. A small amount of the Trust's own waste is transferred from larger 1100 litre wheeled bins and 240 litre wheelie bins either manually, or via the automated bin tipper. This waste is not routinely stored in either the 1100 litre or 240 litre bins in the permitted area, they are used as a means of storage elsewhere on the site and to transport the waste.

All waste will be stored within bags and containers according to waste stream within 770 litre wheeled bins on the impermeable concrete surface. Also, it is crucial to note that some infectious waste, waste containing traces of medicines, and anatomical wastes, are stored within the 770 litre wheeled bins within the refrigerator unit which is indoors and equipped with air conditioning. The remaining 770 litre wheeled bins are stored externally.

There is one UKAS accredited CCTV camera within the permitted area. Further detail on the site layout is shown on Drawing Ref: 220525RPH101.

4.2 Vulnerable Locations

There are sensitive receptors within 1km of the site, the closest being the residential properties located approximately 100m to the southeast on Sharoe Green Lane. There are several educational facilities within 1km of the site, the closest being St Clare's Catholic Primary School situated approximately 150m to the northeast of the site. There are several care homes within 1km of the site, the closest being Barchester – Sherwood Lodge located approximately 575m to the northeast of the site. The site itself is a medical centre, however there is also several other medical facilities within 1km of the site. The closest medical centre is Unison Central Lancashire Health Centre situated approximately 420m to the southeast of the site. There are no additional sensitive receptors within 1km of the site.

Due to the distance of the site from the sensitive receptors, all processing being undertaken indoors and the mitigative measures in place (please refer to Sections 5.12, 5.13, 5.14, 5.15 and 5.16 for further detail) the nearby receptors are at very low risk of experiencing adverse impacts from the site. The site is fully surfaced with impermeable concrete and has pollution control measures in place to prevent pollution e.g. spill kits. In the event that sensitive receptors may be at risk, they will be notified by phone call or by site operatives knocking on doors and informing them of the incident and reassuring them that every measure is being taken to control and rectify the situation.

4.3 Drainage

The permitted area is entirely surfaced with impermeable concrete. It is crucial to note that no waste is stored directly on the concrete surface. All waste is stored within a sealed bag or container, within a sealed 770 litre wheeled bin on site.

As stated above, some infectious waste, waste containing traces of medicines, and anatomical wastes, are stored within the 770 litre wheeled bins within the refrigerator unit which is indoors and equipped with air conditioning.

Any potential spillages will be dealt with appropriately within the permitted area using the spill kit that is provided on site. The location of the foul sewer is shown on Drawing Ref: 220525RPH101.

4.4 Water, Gas and Electricity

The water on site is supplied by United Utilities. The electricity is supplied by EDF. The gas is supplied by Total Energies Gas and Power Ltd.

4.5 Waste Handling

Royal Preston Hospital is seeking to obtain a new bespoke permit for the clinical waste transfer station to enable the permitted area to accept clinical waste from customers outside the Royal Preston Hospital. The permitted area is a small scale operation that will accept up to 1,750 tonnes of clinical waste per annum. The average weekly tonnage will be 34 tonnes.

The permitted area comprises of an external yard with 770 litre wheeled bins used for storage, a bin tipper and scales for weighing waste upon arrival which is under cover, and an indoor refrigerator unit with additional 770 litre wheeled bins for storage and a quarantine area. The indoor refrigerator unit is equipped with air conditioning.

The site accepts six different waste streams consisting of offensive waste, sharps waste, infectious waste, cytotoxic/cytostatic waste, medicine waste and anatomical waste. Each waste stream is clearly identified by the type of waste bag/container it is stored in, as well as the bin tag. External waste will be received and immediately loaded into 770 litre wheeled bins. Trust waste will already be contained within 770 litre wheeled bins. The bins are moved to the weigh scales which are under cover to the north of the permitted area to be weighed. Once weighed, each wheeled bin of waste is labelled with the appropriate bin tag indicating source, weight, date, and waste type.

It is crucial to note that all of the 770 litre wheeled bins are clearly labelled with the type of waste stream they are assigned for. Each wheeled bin is locked and accessed by the use of a bin key. Once opened and the waste stored inside, each wheeled bin is equipped with an automatic closing and locking mechanism, and therefore the waste will have very little exposure.

All waste will be stored within bags and containers according to waste stream within 770 litre wheeled bins on the impermeable concrete surface. Also, it is crucial to note that some infectious waste, waste containing traces of medicines, and anatomical wastes, are stored within the 770 litre wheeled bins within the refrigerator unit which is indoors and equipped with air conditioning. The remaining 770 litre wheeled bins are stored externally.

5. SITE OPERATIONS

5.1 Waste Types

The range of wastes handled on site are described above in section 4.5. All the waste accepted at the site will be in accordance with the Environmental Permit for the site.

Material Type	Form	Amount (Weekly)
Clinical Waste – various	Sealed bags and	Average: Up to 34 tonnes
streams	containers	

5.2 Retention Times

The site accepts hazardous and non-hazardous wastes in the form of clinical waste, medicinal waste and offensive waste. The site operates a First in First Out system for waste to ensure that the wastes are not inadvertently stored for long period of time. This ensures that wastes are normally retained for no longer than 48 hours of receipt. The site is designed to accept a maximum of 1,750 tonnes of clinical waste per annum which demonstrates that such handling is tightly controlled, and waste will be on site for no longer than 7 days.

Material Risk Rating	Timescale
Higher risk material (Clinical Waste)	Material will be retained for 7 days.

5.3 Waste Acceptance Procedures

Waste reception and handling is subject to Site Working Procedures. Loads are inspected by site staff at the point of collection prior to being accepted. Wastes are also supervised so that any issues which were hidden and not identified prior to receipt can be seen in accordance with procedure SWP007. The waste will be directed to the bin tipper scales where it will be unloaded and weighed, prior to being transferred to the allocated storage 770 litre wheeled bins according to waste streams.

Any non-conforming materials found in the waste will be dealt with in accordance with the rejecting waste procedures Ref: SWP015.

Wastes are handled in accordance with various requirements of the Environmental Permit, and the requirements of the end market. These operations have been outlined above in section 4.5.

5.4 Non-conforming Waste

Every load brought onto site will be inspected by an operator. Any loads that contain non-acceptable materials will be rejected and either removed from site immediately by the customer or stored in the quarantine area pending removal to a suitable permitted facility.

Non-conforming waste is defined as waste that the site is not permitted to accept under the planning permission and the environmental permit. If non-conforming waste is identified prior to unloading,

site management will be alerted immediately. If it is customer waste, the customer will have to remove this waste from the site, or return to the site to collect the waste. For Trust non-conforming waste this will be separated from the and transferred to the quarantine area pending further investigation and appropriate disposal. Non-conforming materials found after tipping will be segregated and stored under suitable conditions before being either collected by the customer or dispatched to a suitable permitted facility.

If the same waste stream is regularly found to contain non-conforming materials, then a review of the acceptance procedures will be undertaken.

If it is necessary, non-conforming loads shall be reported to the appropriate authorities.

5.5 Hazardous Waste Handling Procedures

The site accepts hazardous and non-hazardous wastes in the form of clinical waste, medicinal waste and offensive waste. These wastes are delivered from various customers across the Lancashire area as well as the Trust's own waste. On arrival, all waste is inspected at the entrance by the site staff to ensure that the waste delivered to the site meets the following criteria:

- EWC Code on the waste transfer note conforms to the waste inside the container.
- Permit waste acceptance criteria waste meets with the criteria of the environmental permit and the planning permissions for example, waste accepted would be within the permissible tonnage and waste type acceptance criteria.

If non-conforming hazardous waste is identified upon arrival, the load will be rejected immediately.

Once the waste has been accepted, it is weighed on the weigh scales in the north of the permitted area as shown on Drawing Ref: 220525RPH101. The waste is kept segregated at all times in the relevant 770 litre wheeled bin according to waste stream. Some infectious waste, waste containing traces of medicines, and anatomical wastes, are stored within the 770 litre wheeled bins within the refrigerator unit which is indoors and equipped with air conditioning. The remaining 770 litre wheeled bins are stored externally.

5.6 Weighing Facilities

There are weigh scales to the north of the permitted area where the waste is weighed upon arrival. Waste weight records are kept on an automated system with reports available as and when required.

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5.7 Traffic Management

The site operates in accordance with a traffic management plan which is subject to annual review or

where incidents occur.

5.8 Operating Arrangements

Plant is used for daily site activities which includes the bin tipper and weigh scales. The bin tipper and

weigh scales are a form of fixed plant and the location is shown on Drawing Ref: 220525RPH101. All

vehicles and plant used for daily activities are subject to a planned maintenance programme to

minimise downtime and unplanned failures. A service planner is maintained to ensure that the

required inspection and servicing is undertaken in a timely manner.

Routine site inspections are carried out daily by the site staff and weekly by the COTC holder. Where

any damage is found; these shall be reported and repaired within the set timescales;

Plant – 48 hours

Vehicles – 48 hours

Buildings – 7 days

Or if this is not possible, alternative arrangements shall be made as detailed below.

In the event of breakdowns lasting more than 48 hours alternative arrangements shall be considered

as follows;

Plant and Vehicles

Hiring temporary vehicles or plant machinery

A site inspection will be carried out weekly by the COTC holder. The results are recorded on the Site

Inspection Sheet.

As a minimum, the site inspection shall consider;

Condition of concreted areas

Perimeter walls

Site access

• Alarm systems

Condition and availability of vehicles

Waste records

Site tidiness

• Litter, pests, mud, dust, and odour

Any issues found will be dealt with promptly and within the timescales highlighted above.

A review of Site Inspections shall take place at management meetings. Any trends identified will be discussed and action taken to address the issues.

5.9 Site Tidiness

The site will be inspected daily by the site staff and weekly by the COTC holder. Any accumulated litter, debris or dust will be removed. The site access and concrete hard standing will be swept as necessary by a manual sweeper. If potential visible accumulations of debris are identified transferring to the public highway, a mechanical sweeper will be hire immediately to clean the highway.

Stockpiles will be maintained within the limits set out in the planning permission.

5.10 Site Security

The site has not experienced any trespass or vandalism. The security system consists of a CCTV camera with a motion sensor and that operate 24 hours a day that were designed, installed, and are maintained by a UKAS accredited installer. The system is monitored by the on site Security Team, who will attend if unusual activity is noted. The area has gates which are secured outside of normal working hours. In the event of a fire the site operatives will first raise the fire alarm and then notify site management.

A fire alarm (system category L3) has been installed by a UKAS accredited installer to BS 5839-1:2002 on site. The detection system alerts staff during the day and at night, switchboard will be alerted.

The detection/security systems used are proportionate to the nature and scale of the waste management activities carried out on site. The design, installation and maintenance of all automated system are covered by an appropriate UKAS-accredited third-party certification scheme.

5.11 Dust Control

Due to the nature of waste accepted on site, dust is not expected to become an issue. All areas where vehicles operate is on a concrete surface. Any visible accumulations of dusts on site will be removed by hand sweeping or by a mechanical sweeper. If visible accumulations of dust are transferred onto the public highway, then a mechanical sweeper will be hire immediately.

Any dust issues will be dealt with in accordance with procedure SWP004 of the Site Working Procedures Manual.

5.12 Noise Management

There are sensitive receptors within 1km of the site, the closest being the residential properties located approximately 100m to the southeast on Sharoe Green Lane. There are several educational facilities within 1km of the site, the closest being St Clare's Catholic Primary School situated approximately 150m to the northeast of the site. There are several care homes within 1km of the site, the closest being Barchester – Sherwood Lodge located approximately 575m to the northeast of the site. The site itself is a medical centre, however there is also several other medical facilities within 1km of the site. The closest medical centre is Unison Central Lancashire Health Centre situated approximately 420m to the southeast of the site. There are no additional sensitive receptors within 1km of the site.

The site operations are not considered to be noisy and are unlikely to cause an issue beyond the site boundary.

However, measures are taken to minimise noise generated by permitted operations.

As a result, certain limitations have been implemented which restricts operations to set hours. Noise generated by permitted operations will be controlled and minimised.

Measures taken to minimise noise are:

- Only operate during working hours.
- Switch engines off whilst unloading or waiting to unload.
- When not in use vehicles will be switched off.
- Noise complaints to be recorded and investigated.

Any problems with noise will be dealt with in accordance with procedure SWP0011 of the Site Working Procedures Manual.

5.13 Odour Control

The nature of waste accepted on site indicates that there is the potential for odour to become an issue. However, the following measures have been put in place to minimise odours should they occur:

- Non-conforming malodorous wastes are removed from the site for disposal at the earliest opportunity.
- Deodorising equipment consisting of a Knapsack Sprayer, is present on site at all times and will be used if odours occur.

It is crucial to note that the site will operate in accordance with the Odour Management Plan Ref: RPH.PT.OMP.2205 at all times. The Odour Management Plan details in procedures in place to minimise the risk of odour as much as possible.

5.14 Litter Control

There is a low risk of litter due to all wastes being stored within sealed bags and containers within 770 litre sealed wheeled bins. However, the following measures are in place to minimise the risk of litter:

- Litter pick can be carried out by a member of staff on site.
- Restricting the inputs of wastes which can lead to litter.

5.15 Pest Control

Due to the waste types accepted on site, it is unlikely that pests will become an issue as they do not provide a suitable habitat for pests. However, if an issue does develop the following measures will be taken:

A pest control contract is in place for the whole of the Trust site, including the waste yard. This includes the provision of bait boxes and regular inspections of the boxes by the contractor. Any recorded sightings of pests are reported to the manager of the pest control contract, and they attend site, usually within 48 hours.

- Use of commercial products.
- Use of a professional pest service.

If a waste is causing pest issues, then it will be removed from site immediately. This waste will not be accepted again until measures have been implemented to prevent pests.

5.16 Flood Risk

- 5.16.1 The site is located in a Flood Zone 1, indicating that the land is assessed as having than 1 in 1,000 annual probability of river or sea flooding (<0.1%).
- 5.16.2 The site is prepared to deal with the consequences of this flooding and has an impermeable concrete surface and all waste storage will be enclosed within the sealed bags, sealed containers, and sealed 770 litre wheeled bins.
- 5.16.3 In the event of a flood all operations on site would cease. No vehicles other than the Fire Rescue Service or Environment Agency would gain access to the site due to control of the site gates by staff.

6. CONTINGENCY PLANS

In the event of a fire at the site all operations on site would cease. No vehicles other than the Fire Rescue Service or Environment Agency would gain access to the site due to control of the site gates by staff. Any waste loads or customers on their way to the site will be diverted away.

In the event of a flood all operations on site would cease. No vehicles other than the Fire Rescue Service or Environment Agency would gain access to the site due to control of the site gates by staff.

7. ACCIDENT PREVENTION AND MANAGEMENT PLAN

Please refer to document Ref: RPH-2205-0001-Accident Management Plan for the detailed plan. The Accident Prevention and Management Plan was last reviewed in May 2022. The plan will be reviewed and updated annually or after any incident.

8. A CHANGING CLIMATE

The main effects climate change will have on site is increased rainfall and intensity of storms. The site is prepared to deal with the consequences of this flooding and has an impermeable concrete surface and all waste storage will be enclosed within the sealed bags, sealed containers, and sealed 770 litre wheeled bins.

The site is located in a Flood Zone 1, indicating that the land is assessed as having than 1 in 1,000 annual probability of river or sea flooding (<0.1%).

9. PERSONNEL AND DUTIES

The site is operated by various personnel with discrete duties and responsibilities. A management structure is shown in Appendix 1 below.

Technically competent management is available on site. A copy of the CV and WAMITAB certificate of the COTC holder is kept on site.

10. STAFF COMPETENCE AND TRAINING

Site management is responsible for ensuring that all operatives are appropriately trained in the moving, organising and storage of waste and any other activities that are carried out on site by the operatives. Training is carried out in the form of toolbox talks and the mandatory Trust training programme. Where additional training is required this may be provided by external sources.

Operatives are responsible for carrying out all daily operations. All training that is carried out on site will be recorded in their personal records. Training will be carried out annually and involve a refresher on all the relevant planning and permitting documents.

11. RECORDS

Maintenance, inspections, and all other related records will be kept in the Estates offices in either folders or on a spreadsheet on a computer.

12. SITE CONDITIONS REPORT

1.0 SITE DETAILS		
Name of the applicant	Royal Preston Hospital	
Activity address	Sharoe Green Lane,	
	Fulwood,	
	Preston,	
	PR2 9HT	
National grid reference	SD 53727 32893	

Document reference and dates for	12 Site Condition Report
Site Condition Report at permit	
application and surrender	

Document references for site plans	220525RPH102
(including location and boundaries)	

2.0 Condition of the land at permit issue		
Environmental setting including:	The site is underlain by made ground	
	according to the British Geological	
• geology	Survey Mapping.	
 hydrogeology 		
surface waters	The nearest publicly available	
	borehole is located to the west of the	

site and indicates that the ground consists of clay and wet sand to a depth of 3m, followed by brown clay down to 8.5m. The borehole then shows dry sand, red and brown layers to a depth of 21m followed by brown stiff clay down to 25m. To a depth of 38.5m the borehole shows wet silty sand, the sandy marl following to a depth of 52m. From 68m deep and onwards, the ground consists of interchanging layers of sandstone with marl bands and sandy marl.

A second publicly available borehole is located to the east of the site and indicates that the ground consists of topsoil to a depth of 0.2m followed by stiff, grey-brown, to brown silty boulder clay down to 3.5m. The borehole then shows firm, brown, very silty clay with an occasional thin, moist sand band to a depth of 6m.

A third borehole to the west indicates that the ground consists of firm to stiff, brown, sandy clay to a depth of 10m, followed by stiff, orange, clayey sand to 12m deep. The borehole then shows the ground to be dense, orange-brown sand down to 15m followed by dense, grey, coarse sand down to 20m. Lastly, the borehole shows dense, red-brown, occasional clay bands to a depth of

30m. There are no Environment Agency Pollution history including: recorded pollution incidents pollution incidents that may have associated with the site that may have affected land affected the land under the ownership historical land-uses and of Royal Preston Hospital. associated contaminants Reference to historical IOS any visual/olfactory evidence of maps indicate that the site was open fields existing contamination and open land from 1891 evidence of damage to pollution until prevention measures approximately 1955 where the site began to be developed into a GP. The Royal Preston Hospital was then built in 1983 and has been used for such purposes ever since. The site has an impermeable concrete surface and all waste is entirely enclosed within sealed bags, containers and sealed 770 litre wheeled bins. Therefore, during any flood or fire event there will be no pollution to soils, surface water or groundwater. Evidence of historic contamination, for No previous historical site investigation example, historical site investigation, data or reports are available. remediation assessment, and verification reports (where available)

Baseline soil and groundwater reference	Not Applicable
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data		
Supporting	N/A	
information		

3.0 Permitted activities	
Permitted activities	As per Bespoke Environmental Permit:
	Clinical Waste Transfer Station
Non-permitted activities undertaken	Business Administration
Document references for:	
	220525RPH101
 plan showing activity layout; and 	
environmental risk assessment.	RPH.PT.ERA.2205

4.0 Changes to the activity	
Have there been any changes to the activity boundary?	Yes. The site is reducing the size of the permitted area from the previously granted permit Ref: ZP3191CY/V002 so that it no longer includes the CHP plant. It is crucial to note the previously granted permit was for a very similar operation.
Have there been any changes to the permitted activities?	No
Have any 'dangerous substances' not identified in the Application Site Condition Report been used or produced as a result of the permitted activities?	No
Checklist of supporting information	Not Applicable

5.0 Measures taken to protect land

Pollution prevention measures have been carried out and are in place at the site. The site is entirely surfaced with impermeable concrete. All waste is entirely enclosed within sealed bags, containers and sealed 770 litre wheeled bins. Therefore, no pollution pathways to soil or surface and groundwater exist.

Checklist of supporting

information

- Inspection records and summary of findings of inspections for all pollution prevention measures.
 - Records of maintenance, repair, and replacement of pollution prevention measures

6.0 Pollution incidents that may have had an impact on land, and their remediation

There has been no evidence of any pollution incidents or spillages.

Checklist of supporting information

of • Not Applicable

7.0 Soil gas and water quality monitoring (where undertaken)

All wastes are deposited on impermeable concrete surface in the industrial unit building. No soil or gas monitoring is therefore considered necessary as no pollution pathways exist to soils.

No known spillages or pollution incidents have occurred and so no pollution pathways exist to surface of groundwater. Therefore, no water quality motoring is considered necessary.

Checklist o	of •	Not Applicable
supporting		
information		

8.0 Decommissioning and removal of pollution risk Checklist of supporting information

9.0 Reference data and remediation (where relevant)

No land or groundwater data was needed to be collected. The information from section 3, 4, 5 and 6 show that the land is in a satisfactory condition and has not deteriorated.

Checklist of	•	None
supporting		
information		

10.0 Statement of site condition

The permitted activities are to be carried out at this location. All pollution risks have been mitigated with no reported evidence or incidents of pollution or spillages. The land is deemed to be in a satisfactory condition.

13. COMPLAINTS

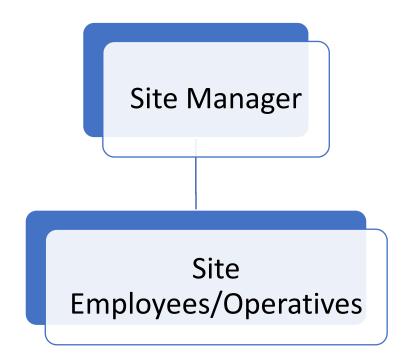
Any complaints received shall be dealt with in accordance with the procedure SWP002 Complaints Procedure of the Site Working Procedures Manual.

14. REVIEW OF THE SYSTEM

A review of the Environmental Management System shall take place in response to any incidents or accidents and annually on or around the anniversary of the System. The review shall be carried out by site management and the findings recorded. Any defects, shortfalls, or changes to the system shall be recorded and the system amended accordingly.

At each review staff will receive training in the form of toolbox talks to highlight any changes.

APPENDIX 1 – MANAGEMENT STRUCTURE



APPENDIX 2 – DRAWING REF: 220525RPH101

