

GGL 3 - Summary Environmental Management System for GAP Group Limited - Tanker Emptying Facility - Dock Road, Tilbury, Thurrock, Essex, RM18 7EQ

The Environmental management systems aims to help GAP Group Limited (known from now on as GAP) improve environmental performance, minimise risk and reduce business overheads.

Once permitted and operational the waste transfer and treatment operation will be incorporated into the current EMS.

The EMS employs the Plan, Do, Check, Act principal allowing all Environmental risks to be identified and mitigated, but also allows the effectiveness of the EMS to be assessed, measured and reviewed and improvements and corrective actions employed to improve environmental performance.

The PDCA model ensures environmental issues are systematically identified, controlled and monitored in accordance with an organisation's environmental policy, which is periodically reviewed and updated.

The EMS uses the PDCA model and incorporates the following elements.

The EMS aims to identify all relevant environmental risks, sources of pollution and receptors and show how these risks are managed.

Site Description and History

The EMS will contain a site description and history of the site for context

Auditing

The EMS will be both internally and externally audited by GAP and its appointed contractors

Document Management

Documents will be managed in the following information being recorded on all documents –

- Date of review
- Author
- Document reference number
- Document version
- Next review date

Site plan

The site plan will include the following –

- buildings, and other main constructions, fixed plant, fences
- storage facilities for hazardous materials like oil and fuel tanks, chemical stores, waste materials
- location of items for use in accidents and emergencies, like absorbents for chemical spills
- entrances and exits that can be used by emergency services
- points designed to control pollution, for example inspection or monitoring points

Engineered Site Surface and Drainage System

The EMS will include details of the sites drainage both surface water and foul

Trade Discharge Consent

The site will benefit and work to a trade discharge consent issued by the local water provider.

Non-Conforming waste

Non-conforming wastes if identified will be –

- Stopped from tipping and turned away

Security

Details of the sites security will be recorded including –

- Fencing and gates
- CCTV
- Alarm system

Leaks and Spills

The EMS will contain information on how leaks and spills are to be managed including

- Locations of spill kit
- Training required
- How to respond to incident

Contractors and visitors

Contractors and visitors will be made aware of the EMS via GAP environmental statement

Waste Storage

The storage plan will include -

- the longest amount of time that each type of waste will be stored
- how storage limits will not be exceeded
- the maximum amount of each type of waste will be stored in terms of volume
- the maximum height of each storage pile on site
- how each specific waste types will be identified?
- how each waste type will be kept separate?
- how GAP ensures the site only takes waste that the permit allows to be stored

Site and equipment maintenance plan

Plant and equipment will be maintained according to the manufacturer's or supplier's recommendations

Maintenance such as servicing and calibration will be recorded.

The plan will include fixed and mobile plant.

All maintenance and breakdowns will be recorded and records retained.

Contingency plans

The EMS will show how GAP will minimise the impact on the environment of any:

- breakdowns
- enforced shutdowns
- any other changes in normal operations, for example due to flooding or other extreme weather
- Flooding

Accident prevention and management plan

The accident prevention plan will show how GAP will deal with any incidents or events that could result in pollution.

The plan will identify potential accidents, for example equipment breakdowns, enforced shutdowns, fires, vandalism, flooding, or any other incident, which causes an unexpected, change to normal operations, such as bad weather.

For each potential incident, it will state:

- likelihood of the accident happening
- consequences of the accident happening
- measures GAP will take to avoid the accident happening
- measures GAP will take to minimise the impact if the accident does happen
- The accident plan will also record, investigate and respond to accidents or breaches of the permit.

The accident plan will be reviewed annually or after an accident when it will next be reviewed

The accident plan will also contain -

- a list of emergency contacts and how to reach them
- a list of substances stored at the site, and the storage facilities
- forms to record accidents on

Contact information for the public

The site notice board will include -

- GAP name (company name at least)
- an emergency contact name and telephone number
- a statement that the site is permitted by the Environment Agency
- the permit number

Environment Agency telephone number 03708 506506 and the incident hotline 0800 807060

Complaints procedure

The GAP complaint procedure will deal with any complaints that are received in relation to activities covered by the permit (for example complaints from neighbours about noise, odour or dust from the site)

It will include -

- how GAP investigate those complaints
- any actions taken as a result of complaints
- Managing staff competence and training records
- The need to have enough staff and resources to make sure the site is run effectively in order to comply with the permit.

Technical Competency and training

GAP's management system will explain who is responsible for what procedures and who is technically competent.

GAP will also check that staff and contractors have taken the training or qualifications required for the work they carry out and record any training, refresher training or qualifications taken by staff or contractors

Keeping records

GAP will keep any records required by the permit.

GAP will keep records to show that the management system is being implemented in line with the requirements of the permit.

Documents on site

GAP will ensure the following are on site -

- permits issued to the site
- other legal requirements
- Risk assessment
- all management system plans
- any plans required by the application or permit depending on the type of activity (for example odour management plan at waste sites)
- all operating procedures
- staff competence and training (for example qualifications, courses attended)
- emissions and any other monitoring undertaken (for example water samples)
- compliance checks, findings of investigation and actions taken
- complaints made, findings of investigation and actions taken
- audits of management system, findings (reports) and actions taken
- management reviews and changes made to the management system
- where applicable, certification audit reports and any actions carried out

Waste input and outputs

Each delivery of waste at the site will be recorded, including -

- its quantity (weight or volume)
- its List of Waste (LoW) Code
- its origin (for example, the location the waste sent from)
- the identity of the producer of the waste (for example the company name)
- the date the waste arrives at the site

- the date the waste was first produced, if the waste is likely to cause odour
- any quarantined materials that are part of the delivery, and what happened to them.

Record will be kept to show that GAP are meeting their duty of care

Site closure / diversion of waste

In the event of a site closure either planned or in the event of an emergency GAP will divert waste to other identified permitted waste facilities and notify customers.

Specific plans

In the event of Odour, noise, dust or pest becoming an issue a specific plan will be produced

Review

The EMS will be reviewed annually or if there is

- a change to the maximum amount of waste stored on the site
- new waste treatment equipment
- implementation of new control measures
- implantation of specific management plan such as noise
- In the event of a pollution incident
- In the event of complaints
- In the event of guidance or regulation changes

Access to EMS and staff briefing

GAP's staff will have access to and understand any sections of the management system that deal with activities they carry out.