



Environmental Management System Manual

Stuart Hamilton Plant Limited

Version 1.0

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Executive Summary

This EMS manual documents HPL policies and systems for the management of its environmental impacts.

The EMS manual has the following purposes -

- to establish, describe and maintain an effective environmental management system covering the implementation of HPL environmental policy, and its commitment to conforming with environmental regulations and continual improvement in environmental performance
- to identify, and provide a guide to, the procedures and instructions that ensure that all personnel operate the system correctly
- to provide a reference document for all staff whose activities may have an influence on HPL environmental performance
- to assist in the training of personnel
- to facilitate auditing of the system
- to demonstrate to interested parties that a system exists which is leading to continual improvement in environmental performance

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Revision History

Version	Date	Section	Changes
1.0	10/03/2021		First issue

List of Abbreviations

Abbreviation	In Full
EMS Ltd	Environmental Monitoring Solutions
EMS	Environmental Management System
HPL	Stuart Hamilton Plant Limited
WTN	Waste Transfer Note
HWCN	Hazardous Waste Consignment Note
CoTC	Certificate of Technical Competence

1. Introduction

An Environmental Management System (EMS) has been produced which will be implemented to ensure continuous compliance with Stuart Hamilton Plant Limited (HPL) Environmental Permit.

The EMS will provide the foundations and tools to ensure that environmental risks are managed, compliance with legislation is maintained and continuous improvements are developed.

This EMS outlines the requirements on site which need to be carried out to achieve the above. All staff have a responsibility to adopt and adhere to site policies and procedures to comply with the conditions set out in the Environmental Permit and prevent negative impacts to the environment.

An Environmental Permit is a legal requirement in compliance with The Environmental Permitting (England & Wales) Regulations 2016. The permit is required to operate and control activities at HPL waste transfer station located at Woodbourne Hill, Sheffield.

Deviation from the permit is a breach in these regulations therefore it is important the following procedures and policies are adhered to and adopted by all staff and contractors working for or on behalf of HPL.

NOTE: Deviation from the permit can result in the following:

- Spot fines
- Enforcement notice
- Permit is revoked
- Closure of site
- Fines and prosecutions

1.1. Scope

The EMS applies to the processes and activities carried out at the waste transfer station located at Ripon Street, Sheffield, S9 3NE (EMS Appendix 1, 1a and 1b).

2. Environmental Policy

A copy of the environmental policy is included as EMS Appendix 2 of this document. The Policy is endorsed by the Management Team who are fully committed to its implementation. It will be reviewed on a regular basis to ensure suitability, adequacy and effectiveness. The policy will be clearly displayed on HPL premises and all who attend site shall be briefed in the commitments. It will be provided to interested parties and be available on request.

3. Legal & Other Requirements

HPL and all those who are employed within the company or who are protected by its undertakings, and those working on HPL behalf have an obligated duty to ensure compliance with legislation and other applicable requirements identified in the Legal & Other Requirements Register.

HPL have identified compliance obligations in relation to its activities, products, services and customer needs and expectations. This is reviewed and updated on a quarterly basis and includes an explanation of how the identified Compliance Obligations apply to HPL activities (EMS Appendix 3).

Staff must be notified of any relevant new or pending obligations and associated documentation must be updated as necessary. The register is available to all staff on request.

4. Environmental Risk Assessment / Aspect & Impacts

4.1. Purpose

The purpose of the environmental risk assessment and aspects and impacts register is to identify HPL aspects from sites activities, products and services that have an impact on the environment (EMS Appendix 4). Those aspects identified as significant will be managed accordingly and effective control measures implemented to ensure the risk to the environment is reduced. This aspects and impacts have been assessed based on the condition of the site and the activities that are carried out that have the potential to negatively affect the environment.

The environmental aspects and impacts will be reviewed every quarter and will include:

- Changes to the way in which the company operates
- Implementation of new legislation and/or amendments to existing legislation and other requirements
- Compliance with appropriate environmental legislation
- Control measures which are in place

4.2. Methodology

The following aspects and impacts rating methodology has been used to establish the environmental aspects present on site. The methodology will determine the overall risk given to each environmental aspect. High risk aspects will be addressed first with the aim of reducing the overall risk factor. Every environmental aspect has been assessed according to the following criteria.

4.2.1. Likelihood

- High: The activity is expected to occur in most circumstances causing negative environmental impacts
- Medium: The activity will probably occur in many circumstances causing negative environmental impacts
- Low: The activity may occur at some time causing negative environmental impacts

4.2.2. Impact

- High: Serious, negative impact on the environment
- Medium: Significant negative impact on the environment
- Low: Less significant negative impact on the environment

4.2.3. Overall Risk

Likelihood	High	Medium Risk	High Risk	High Risk
	Medium	Low Risk	Medium Risk	High Risk
	Low	Low Risk	Low Risk	Medium Risk
		Low	Medium	High

Impact

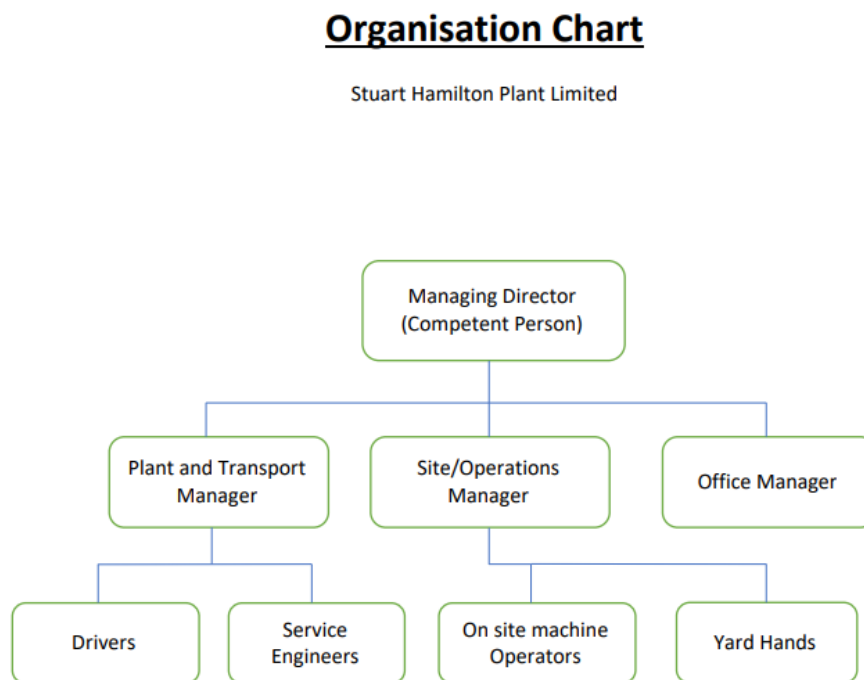
- **Low risk:** Low probability of occurrence; controlled under normal conditions; minimal impact
- **Medium risk:** Could break legal or policy requirements; emergency would cause large environmental impact; not fully controlled under normal conditions; environmental impact under normal operating conditions but no breach of regulations; moderate probability of occurrence
- **High risk:** Not controlled under normal conditions; in breach of regulations; extensive impact; probable occurrence

5. Roles and Responsibilities

The successful implementation of an EMS calls for commitment from all persons working at HPL or on its behalf. The commitment will begin at the highest levels of management and be filtered down through the organisation.

It is also important that key environmental roles and responsibilities are defined and clearly communicated to ensure legal compliance with sites Environmental Permit and applicable legislation. See organisational chart below:

5.1. HPL Organisational Chart



5.2. Company Directors

The Managing Director has overall responsibility for:

- The ownership, commitment, implementation and management of the EMS and the Environmental Permit
- Ensuring resources are available to enable successful implementation of the EMS and to facilitate continuous environmental improvement
- Ensure site environmental risks are managed and environmental compliance is maintained
- Attend 'Environmental Management' meetings
- Review all complaints, accidents and incidents
- Communicating to staff their roles and responsibilities

- Ensuring staff and contractors are trained to operate on site

The Board of Directors have responsibility for:

- The ownership, commitment, implementation and management of the EMS and the Environmental Permit
- Ensuring resources are available to enable successful implementation of the EMS and to facilitate continuous environmental improvement

5.3. Operations Manager / Managing Director (Technically Competent Person)

The Operations Manager / Managing Director is responsible for:

- Ensuring employees are aware of their roles/responsibilities and adhere to the environmental policy and procedures
- Overseeing the pre-acceptance and acceptance of wastes on site
- Managing the movement, segregation, storage and treatment of all waste streams
- Ensuring that the permit is adhered to at all times
- Communicating with external parties
- Attending regular 'Environmental Management' meetings
- Submitting accurate data to the EA as specified in the permit
- Ensuring environmental impacts on site are managed through the EMS manual
- Ensure regular maintenance and inspections of plant/equipment
- Dealing with environmental incidents/complaints (reporting to the EA where applicable)
- Reporting deviations from the Environmental Permit to the regulatory body as specified
- Identifying training needs and maintenance of training records
- Regular communication with the Managing Director and Site Administrator/Operations Assistant
- Ensure monitoring is undertaken in accordance with legislative/other requirements
- Act as a source of advice for all employees
- Keep their competency up to date

5.4. Site Administrator/Operations Assistant

It is the responsibility of the Site Administrator/Operations Assistant to:

- In-putting waste accepted onto site into appropriate databases
- In-putting non-waste / product materials into appropriate databases
- Ensure WTN / HWCN / delivery tickets are completed correctly
- Conducting waste documentation audits
- Conducting waste contractor 'duty of care' audits

- Undertake waste carriers licence checks
- Send waste returns to clients
- Report issues with waste documentation to the Operations Manager/waste contractors
- Retain environmental records (e.g. WTN/HWCN) for the required retention period
- Communicate regularly with the Operations Manager and Drivers
- Liaising with clients and waste contractors

5.5. Drivers

It is the responsibility of Drivers to:

- Report environmental incidents/issues to the Operations Manager
- Ensure correct segregation of waste as instructed by the Operations Manager
- Follow site policies and procedures at all times
- Ensure that waste does not escape into the environment
- Ensure waste documentation is completed correctly
- Pass copies of completed WTNs/delivery tickets to the Site Administrator/Operations Assistant
- Attend training sessions as required
- Carry out regular maintenance checks on vehicles

5.6. All Staff

It is the responsibility of all staff to comply with and adhere to the following:

- The Environmental Policy, EMS and procedures applicable to their job role
- Comply with all applicable environmental legislation
- Report environmental incidents/issues to the Operations Manager

5.7. Contractors

It is the responsibility of all contractors working for/on behalf of HPL to:

- Demonstrate any applicable competency prior to work commencing
- Adhere to all site procedures and policies
- Provide waste documentation and records where applicable
- Provide adequate environmental risk assessments where applicable.

6. Competence, Awareness and Training

6.1. Purpose

To ensure all personnel involved in waste management are authorised and competent. An employee training record should be completed for all employees (EMS Appendix 5).

Waste management is a heavily regulated sector. Unauthorised and incompetent management of waste can result in breaches of legal and policy requirements, contractual obligations and sector guidance and cause a significant environmental impact.

The Managing Director shall ensure that all employees performing waste management tasks that have the potential to cause a significant environmental impact(s) or result in breaches of legislation, policy, contractual obligations and sector guidance are competent on the basis of appropriate education, training or experience.

Training needs analysis of all staff will be carried out on an annual basis. Training records and certificates should be retained to demonstrate competence. All employees training is to be recorded on the employee training record (Appendix 5) and retained on file.

Refresher training will take place as and when required or when legislation or working practices change.

6.2. Technically Competent Manager

The Technically Competent Manager, who holds the appropriate Certificate of Technical Competence (CoTC) attends site at a frequency which is required to operate the sites environmental permit in compliance with the Environmental Permitting (England & Wales) Regulations 2016.

The frequency of attendance has been determined by the operational risk appraisal (OPRA) score (EMS Appendix 12).

Table 1: Determination of points for OPRA

Description	Band	Points
Waste Operation	A	1
Location	B	2
Emissions	C	3
	Total	6

Table 1 above shows a total OPRA score of 6. This means the Technically Competent Manager must attend site 20% of the site operational time each week.

If there isn't a Technically Competent Manager, the site will ensure that the appropriate person has attended an Environmental Permitting Operators Certificate (EPOC) course and are working towards achieving the CoTC qualification to demonstrate Technical Competency.

6.3. All Staff

All staff involved with the acceptance, sorting, processing, disposal of waste on site will attend 'Environmental Awareness' training which will cover the following:

- Pollution Prevention
- Managing Risks
- Storage of Oils on Site
- Discharges to Water
- Waste Management – Acceptance, Storage and Disposal
- Spillages
- Environmental Incidents
- Site Environmental Permit Conditions

The training will take place in line with roles and responsibilities and will be delivered in the form of workshops and toolbox talks

6.4. Contractors

Contractors will be inducted on site prior to working. Proof of competency will be sought prior to work commencing.

6.5. Further Training / Development Opportunities:

Where further environmental training and development is required it will be subject to identified specific requirements and authorised by the Managing Director and may include the following:

- Accredited Environmental Courses (i.e. NEBOSH / IEMA / CIEH)
- Accredited Waste Courses (i.e. CIWM / WAMITAB)

7. Communication

7.1. Internal Communication

Environmental information will be communicated internally via methods including, but not limited to:

- Notice boards
- Employee newsletters
- Workshops, toolbox talks and other training events
- Email/memos
- Meetings
- Formal letter correspondence

Any contractors working on site will be made aware of HPL environmental policy, relevant procedures with regards to environmental protection, via the company induction process prior to any work commencing.

Typical topics of internal communication include but are not limited to;

- Environmental roles and responsibilities,
- Environmental policy, objectives and targets,
- Legal compliance
- Environmental procedures
- Emergency response
- Pollution prevention

7.2. External Communication

HPL EMS Manual will be available to relevant external parties upon request.

The Environment Agency shall be notified without delay following the detection of:

- Any malfunction, breakdown or failure of equipment or techniques, accident, or emission of a substance not controlled by an emission limit which has caused, is causing or may cause significant pollution
- The breach of a limit specified in the permit
- Any significant adverse environmental effects

The Operations Manager will contact the EA immediately (refer to Section 12.2.4 for contact numbers) and complete the relevant documents as outlined in the sites environmental permit.

Complaints received from external parties must be recorded on the Complaints Record Form (EMS Appendix 7) and be investigated by the Managing Director and Operations Manager to determine the root cause and prevent reoccurrence. Records of all complaints must be held on file and be retained for 3 years. Complaints will be recorded on the non-conformance database EMS Appendix 8.

8. Site Operations

8.1. Purpose

Guidance will be given by the site management to all employees, subcontractors, other waste carriers and customers regarding waste types that are acceptable at the site. The waste arriving on site will predominantly be brought in by vehicles operated by HPL or delivered by other hauliers who hold current waste carrier's registration certificates. Details will be taken for all new haulage operators bringing waste to the site and the details will be periodically checked with the Environment Agency to ensure registration.

9. Waste Acceptance

9.1. Purpose

HPL have a legal requirement to ensure that only waste listed in the Environmental Permit are accepted on site (EMS Appendix 6). Acceptance of non-permitted wastes on site could cause environmental damage and is a breach of the Environmental Permitting (England & Wales) Regulations 2016 and could result in the permit being suspended or revoked.

9.2. Hazardous / Dangerous Wastes

HPL will not accept for either onsite or third-party treatment, waste which is classified as hazardous or dangerous for carriage by road as this is outside the Environmental Permit conditions.

Waste soils with the List of Waste Code 17 05 04 and from potentially contaminated sites will be approved prior to acceptance. Approval will consist of chemical analysis and assessment which demonstrates that the material is suitable for the intended use without significant risk of pollution. Records demonstrating compliance will be maintained.

9.3. Waste Pre-Acceptance Process

Inert waste will be brought to site using HPL own lorries, or an authorised sub-contractor. Chemical testing for the waste should be received prior to it being transported to site, and checks made by an expert to ensure waste is inert and can be accepted onto the site. Waste will not be accepted from third parties unless it is proven to be inert, has chemical testing documentation, and a correctly completed WTN accompanying the load.

Information required by HPL before waste arrives at site is as follows:

- History of the site of origin
- Demolition of building contractor/supplier details
- Material details (type of waste)
- Chemical testing
- Volume
- Waste Carriers / waste broker registration details (If carrier is not HPL)

If there is any doubt regarding either the site giving rise to the waste or the waste description a representative pre-acceptance sample should be obtained. The Operations Manager has the overall responsibility for determining whether a sample is required at this stage.

In all cases where a pre-acceptance sample is required a fully trained HPL representative will attend site and obtain a representative sample from the production process, unless prior satisfactory sample analysis has been supplied by the producer/holder of the waste.

9.3.1. Analysis

Pre-acceptance samples will be accepted from a UKAS accredited laboratory this will either be arranged by the producer of the waste or HPL.

Analysis required will vary depending upon the nature of the waste, but will typically include the following:

- Heavy Metals
- Hydrocarbons (TPH)
- Polyaromatic hydrocarbons (PAH)
- PCBs
- asbestos

Sample results and analysis will be compared against the information provided and recorded on the system against the unique reference number.

Waste with the EWC code 17 03 02 must be chemically tested to ensure it does not contain Coal Tar.

9.3.2 Collection from customer

The driver must take all associated paperwork when collecting the load.

The driver should undertake visual checks on site (quantity, colour, odour etc.) and if in any doubt about the waste they should contact Head Office for further advice. The driver must not accept any additional wastes which were not pre-arranged.

Prior to leaving the site with the waste the driver should ensure that the WTN has been accurately completed and accompanies the waste.

9.4. Waste Acceptance

The Weighbridge Operator will follow the acceptance criteria process; the waste types must conform to the description in the WTN supplied by the producer and holder. The contents of the load will be inspected by the Weighbridge Operator or Approved Deputy as the load is driven onto the weighbridge by a visual inspection using the camera which is angled to look into the back of HGV's. Waste will be visually checked when it is tipped.

Acceptance of waste at the site will rely on a 3 level hierarchy that will ensure relevant documentation is produced and that all incoming waste streams are recorded and inspected.

Level 1: Detailed characterisation of waste stream

Level 1 characterisation testing will be carried out at the producers prior to the acceptance of waste streams at HPL site. The producer of the waste stream will be required to carry out analysis

that provides a thorough identification of components within the waste including list I and list II substances (DoE Circular 11/94, Annex 7). Level 1 characterisation testing will also be required for any excavated inert material that is to be accepted at the site. The producer of the material will be required to carry out analysis that provides a thorough identification of components within the material. Only when HPL are satisfied will the material be accepted at the site.

Having established the nature of the waste, its acceptance at the site will be evaluated with general consideration to the acceptance criteria detailed in the sites Environmental Management System.

Level 2: Compliance testing

The producer will be required to send the required analytical data/specified information in advance and where applicable with a representative sample. These samples, if necessary, will be sent to an independent laboratory for a confirmation check to ensure results received off the producer are accurate. Once confirmation is received that the waste is as described in the notification/documentation then the producer will be informed that the waste can be sent to HPL site for processing.

Level 3: On-site verification

All other wastes being delivered to the site will undergo, as a minimum, a visual inspection. The on-site verification may however extend to clarification over paperwork i.e. does the waste arriving on site meet the description given on accompanying paperwork. Further visual inspections will be carried out once the waste is off- loaded/stored at the site.

HPL will ensure that; the waste is received from a registered carrier or broker; the waste has a traceable origin and owner. A list of regular waste carriers is held in the weighbridge and duty of care is carried out on waste carriers' licences on a regular basis by visiting the Environment Agency Public register. <https://environment.data.gov.uk/public-register/view/index>

HPL hold their own Waste Carrier Licence (EMS Appendix 9) and use their own HGV's to collect waste and transport to HPL site. Each HPL vehicle appointed to carry waste will keep a copy of the WCL in the vehicle to be presented upon request.

A Waste Transfer Note (WTN) must accompany each waste load accepted onto the site. This is to be inspected for completeness for regulatory information as required within the Duty of Care Regulations. Any load not accompanied by a WTN or accompanied by an incomplete WTN will be rejected. If a company delivers waste to site with an inadequate WTN, a copy of the Environment Agency Waste Transfer Note (https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/311081/LIT_7932.pdf) will be given to the company for completion. The WTN that accompany each and every load will be kept for at least two years as required by law.

The WTN will contain the following information:

- Quantity of waste
- Description of the waste
- EWC code

- SIC code
- Waste carrier details
- Signatures by all parties
- Time and date of transfer
- Statement to show the waste hierarchy has been applied

Under no circumstances can hazardous waste be accepted into the recycling process.

The incoming material will either be delivered to the Waste Reception Area of the Environmental Permitted site or directly to the feeder stockpiles of the aggregate recycling area. Waste is inspected on the weighbridge and when it has been tipped.

9.4.1 Receipt of waste materials

HPL will ensure that strict acceptance procedures are adhered to which will ensure full compliance with statutory duties and processing requirements. All waste will be accompanied with a WTN as required by the Duty of Care regulations. All vehicles that enter site without the relevant paperwork will be rejected and their details will be reported to the Environment Agency.

All waste material will be visually inspected when it arrives on site. The following criteria will be applied to decide upon the acceptance of incoming waste, on receipt and after tipping:

- Only waste that can meet the definition of inert shall be accepted.
- That there is no suspicion of contamination and the wastes are considered to be inert.
- Any load containing any amount of hazardous material shall be rejected immediately and that any load containing 1% by volume of foreign material, such as wood and plastic, shall be rejected sorted through to remove contamination
- These criteria are met by completing visual inspections of every load, on initial receipt and after tipping.

9.4.2 Non-Conforming / Rejected loads

HPL will reject, for example, concrete waste arising from the demolition of an industrial site if we suspect that such waste may be contaminated because of the nature of the industrial operations.

If the waste material does not meet the acceptance criteria, then it will be rejected. This material will either be reloaded onto the vehicle that deposited the waste or placed within the quarantine area for disposal at an authorised permitted / licenced facility. A copy of the WTN or Hazardous Waste Consignment Note will be kept in the Company Office to ensure that an audit trail can be followed. The Environment Agency will also be informed.

HPL will keep a record of the loads rejected (with details on the reason for the decision) for future reference. A copy of the Register of Rejected Loads is detailed in EMS Appendix 8 & 10. The information on this form may be written within the site diary that will record all information as required. This information will be used in discussions with the supplier with regards to the rejected loads; it will provide an explanation as to the reasons for the decision and the actions needed to avoid rejections on future loads.

9.4.3 Weighing and categorising

The tonnage of all waste entering the permitted site will be recorded onto the WTN, and the daily loads database which is kept by the Weighbridge Operator. The tonnage will be either taken from the weighbridge or the maximum tonnage the HGV can carry. This information will be collated and presented within the Quarterly Returns to the Environment Agency. This will ensure the volumes stipulated in the Environmental Permit are not exceeded. The recorded volume of materials will be kept for at least 2 years.

9.4.4 Responsibilities and records to be maintained

The Weighbridge Operator or Approved Deputy will inspect every load and take the decision to accept or reject the load. They will be responsible for managing the accompanying documents or documenting the rejected load.

If the material has successfully passed our strict acceptance criteria, the Weighbridge Operator or Approved Deputy will be responsible for categorising the load and sending it to be tipped into the appropriate stockpile.

If the material fails to meet these standards, the Weighbridge Operator or Approved Deputy will be responsible for rejecting a load at this stage of the process and completing the paperwork and associated procedures as required.

9.4.5 Re-inspecting and stockpiling

HPL inspects material whilst on the delivery or internal transfer vehicle, during tipping and when the load is being pushed into the stockpile. In our experience, contaminated material can be hidden in the bulk of the load and is only discovered when a mechanical loading shovel agitates the waste.

During these operations, site staff will perform visual and olfactory checks on the load to confirm the earlier categorisation. This re-inspection will also consider the acceptance criteria. If the load is acceptable at this point, it will be pushed up into the relevant stockpile of feedstock for the crusher or screener. If the load does not conform to the acceptance criteria, the waste will be rejected, and the appropriate documentation will be completed.

During the initial inspection all visible contaminants will be removed, if hidden contamination surfaces during processing, this material will also be removed. This initial sorting, e.g. handpicking foreign materials such as wood, plastic, metals etc. will be a thorough process. These contaminants will be placed within specific waste skips in order to facilitate their removal from site for recycling or disposal.

If materials are rejected at this stage of the process, the nature of the waste materials will be discussed with the suppliers, if appropriate. This could result in improvements of feedstock material as the supplier will be able to be more considered while selecting materials suitable for the process.

9.4.6 Responsibilities and records to be maintained

The Weighbridge Operator or an Approved Deputy will be responsible for; inspecting the load prior to tipping, confirming categorisation, accepting or rejecting the load, recording details of the load, cleaning the load and pushing it on the stockpile. They will also be responsible for documenting this procedure and keeping the paperwork within HPL office.

10. Waste Recycling

The purpose of this recycling facility is to allow waste streams to be stored treated and blended to produce soil, soil substitutes and aggregate. This will reduce the need for landfill and for the use of virgin materials. Accepted waste on site will undergo several processing operations before being deemed suitable for re-sale by HPL. HPL will include all or some of the following operations; stockpiling, prior to sorting, segregating, crushing, screening and stockpiling of the final recycled products.

Only inert waste materials will be accepted. The following outlines the legal definition of inert waste along with the more practical EWC categories that will be used by site staff during their initial assessment of the waste. The following definition of inert waste was taken from Article 2 (e) of the Landfill Directive:

- It does not undergo any significant physical, chemical or biological transformations
- It does not dissolve, burn or otherwise physically or chemically react, biodegrade or adversely affect other matter with which it comes into contact in a way likely to give rise to environmental pollution, or harm to human health;
- The total leachability and pollutant content and the ecotoxicity of its leachate are insignificant and, in particular, do not endanger the quality of any surface water or groundwater.

Once a load has been accepted for deposit and is found to comply with the conditions of the environmental permit the following outline procedure will apply;

- The driver will be directed where to deposit the load.
- Waste will be crushed and/ or sorted by mechanical plant into different sizes and different specifications. These segregated wastes will either be stored in designated piles.
- Any waste that cannot be recycled will be stored on the site prior to been removed to a suitably licenced waste management site.

If the maximum storage capacity of the site is reached, then no further waste will be tipped until waste can be removed from the site and taken to a suitably licenced or exempt waste management operation.

Unsorted waste will be stored for a maximum of 12 months for inert and 6 months for non-inert waste.

10.1 Potential Contaminants or unsuitable materials

The following list gives examples of materials that are not suitable in the manufacture of recycled material. The list is for illustration and is not exhaustive:

- Chemically contaminated material
- Timber
- Plastics
- Metals

In the event that small amounts of contaminants are found to be present in the load that do not render the whole load unacceptable i.e. 1 piece of wood or plastic etc., these contaminants may be removed prior to processing without causing rejection of the whole load.

If the whole load is contaminated i.e. by chemicals, the load will be rejected and removed from site.

10.2 Storage and stockpiling of waste

Waste will be segregated into two stockpiles on site, waste soil and stones and waste material to produce recycled aggregate see EMS Appendix 1b. These stockpiles are located on hardstanding and the size of the site enables the different types of waste to be located sufficient distance away from each other to prevent cross contamination. A site plan showing these locations will be situated on the office wall.

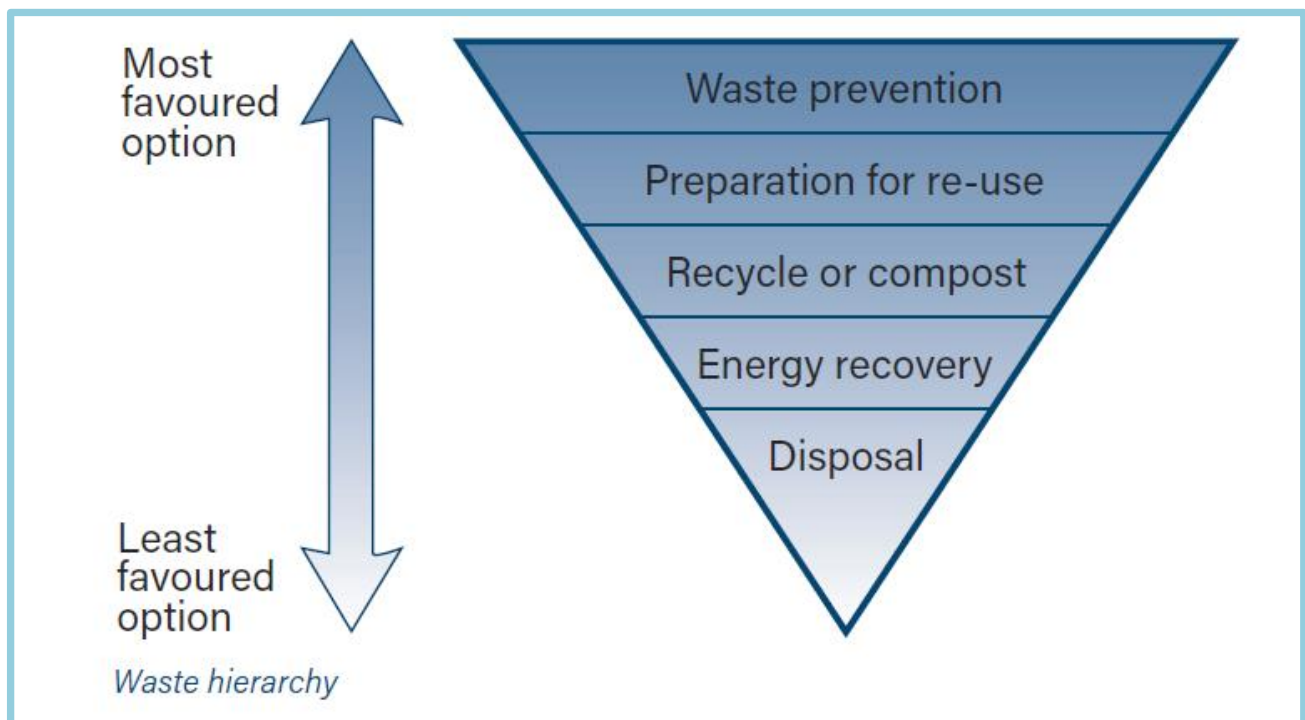
The plant used in the waste processing consist of an excavator which will load the crusher / screener and a loading shovel to carry out housekeeping of stockpiles and move product into product bays.

11. Waste Management

Some waste is expected to arise from the recycling process. This may be in the form of wood, metal and general waste. Waste skips / containers will be labelled and in good condition. They will be stored securely on hardstanding and locked / covered where applicable to prevent escape of waste to the environment. Skips will be stored in an appropriate area and outlined on the site plan.

11.1. Waste Hierarchy

As a requirement of the Waste (England and Wales) Regulations 2011, businesses are required to declare that the waste hierarchy has been applied to all waste transferred from their site. The waste hierarchy according to the regulations is as follows:



The waste hierarchy must be applied to all waste and the declaration is signed effectively when the WTN is signed.

The purpose of this document is to declare how HPL applies to the waste hierarchy to the waste they produce. Various methods are adopted as follows:

- Duty of Care audits and checks are performed on waste contractors to ensure waste is dealt with according to environmental legislation
- All waste is accompanied by a WTN or HWCN which contain a declaration to confirm the waste hierarchy has been applied
- Committing to complying with all applicable environmental legislation
- Committing to training all employees in the correct segregation and disposal practices, in order to avoid cross-contamination of different waste streams and generation of unnecessary waste.

11.2. General Rules

The following rules must be applied when disposing of waste:

- Segregated at source
- Hazardous and non-hazardous wastes stored separately
- Safe and secure storage
- Store in suitably labelled containers - covered/sealed (where applicable)
- Use only licensed waste carriers
- Ensure loads leaving site are accompanied by a WTN/HWCN
- Ensure disposed at a site with a valid permit/exemption and that they are authorised to accept such waste.

11.3. Breakdowns and Spillages

In the event of breakdown of the loading plant an alternative 360-degree excavator or loading shovel will be brought on site until it is repaired unless the repair can be carried out quickly without causing the operations of the site to breach any conditions.

Any breakdown of plant that could lead to a breach of conditions and any spillage will be reported to the Environment Agency as soon as is practically possible.

Any spillage will be cleared immediately using a spill kit. Used spill kit will be disposed of in the correct hazardous waste bin and removed from site by an authorised waste carrier to a site permitted to accept hazardous waste for disposal or recovery.

All staff have a duty of care to ensure that waste is stored on site in the correct manner to minimise risks to the environment and to ensure compliance with the Environmental Protection Act 1990, the Environmental Permit and other directly applicable legislation.

All waste will be stored on a hardstanding surface with away from sensitive receptors.

Litter, dust and deleterious materials generated from the site will be kept to a minimum and contained within the site.

All waste storage areas will be kept clean and tidy, be clearly labelled and any hazardous properties identified.

The spill procedure is located in section 13.2.2.

12. Pollution Prevention

12.1. Purpose

If HPL activities pollute the environment, they may be subject to prosecution in a Court of Law and liable damage and clean-up costs. Therefore, control measures must be adopted to minimise risks and pollution from occurring.

Uncontrolled discharges to water can result in pollution which can affect the environment and human health.

12.2. Water Management

The whole site is flat and covered with a hardstanding surface. No water is used in any of the waste processing unless it is for dust suppression. There is no discharge of water to foul or surface water sewer at any time. The site is not prone to flooding, and ponded water has not been witnessed during heavy rain fall. The whole of the site boundary is bunded with an impermeable material to prevent and uncontrolled run off of rainwater off site. The bund will be checked on a regular basis for integrity and will be maintained as required.

12.3. Noise

It is not anticipated that site operations will cause a noise and vibration nuisance because of the scale and location of the operation. Activities likely to give rise to noise will be those operations associated with screening, crushing, plant/ machinery, reversing alarms from vehicles and unloading/ loading operations.

Noise arising from activities on site will be controlled to minimise the risk of amenity issues.

Operational Hours will be restricted to:

	Mon - Fri	Sat	Sun / Bank Holidays
Operation of Processing Plant	07:00 – 19:00	07:00 - 14:00	Not permitted
Waste Transfer / Loading & unloading of HGVs	07:00 – 19:00	07:00 – 14:00	Not permitted

Arrival / Departure of vehicles	Un-restricted	Un-restricted	Un-restricted
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Noise control measures will include:

- If the Local Authority or Environment Agency request a noise survey, this will be carried out in accordance with BS4142:2014 within one month of the request.
- In the event of a noise complaint associated with vehicle movements outside of operational hours a written report include mitigation measures will be submitted to the Waste Planning Authority
- HPL own fleet vehicles will be fitted with broadband reversing alarms

12.4. Vehicle Equipment Checks and Maintenance

All plant will be checked prior to use by the operator to ensure that there are no defects, leaks or pose any threat to the environment. Daily check sheets will be produced to record findings.

12.5. Control of Mud and Debris

The surfacing of the entire operational area of the site is concrete, tarmac and hardstanding and is not expected to create mud in volumes that would cause an amenity issue. If mud was to become an issue, then the mud would be cleaned by the end of the working day using a road sweeper.

Road vehicles will not track through waste. However, the deposit of material on the public highway will be treated as an emergency and will be cleaned as soon as reasonably practicable.

Vehicles leaving the site can be hosed down if required to prevent mud from falling from vehicles and the generation of dust at a later date.

12.6. Dust

All site operations will be carried out to minimise the creation of dust. A Dust and Emissions Management Plan has been produced as part of the bespoke permit application and can be found in EMS Appendix 13. This document gives a more in-depth analysis of the potential and management of dust.

In summary the dust control techniques are;

- Crushing will be carried out on a campaign basis and will not be a continual daily occurrence.
- The crusher supplied will be fitted with spray bars.

- The drop height from chutes will be kept to a minimum and chutes/ conveyors covered where possible.
- Water spray to be used to damp down site using a bowser.
- Road sweeper and housekeeping to tidy roads and stockpiles

A visual check for dust will be conducted on a regular basis. A record will be made in the site diary of;

- Person undertaking the assessment
- Date
- Time of assessment
- Description of findings
- Description of any dust mitigation employed as a result of the assessment
- Assessment on the effectiveness of any dust mitigation measures
- A water hose and attachment (spray) may be used to dampen the site and stockpiles to reduce the potential for airborne dust/ particles.

12.7. Odour

It is not perceived odours will be a problem due to the nature of the waste types accepted on site. Odours can be mitigated using good operational techniques. Should odour become an issue then the following action will be taken:

- Investigate the source of the odour
- Investigate operations management
- Investigate other potential sources exterior to the site
- Investigate complaint

12.8. Pests

It is unlikely that pests will present a problem because of the waste types handled at the site but a recognised pest control contractor will be brought in if any problems are encountered.

The site will be inspected as part of the weekly site inspection and the presence of vermin would be noted in the site diary with a description of the action taken and its effectiveness.

12.9. Fire

It is not thought fire from waste activities to be significant due to the inert nature of waste types processed.

Naked flames and smoking are not allowed on site, other than in a designated area outside the site office.

No waste material shall be burned within the boundaries of the site.

Any fire at the site will be regarded as an emergency and immediate action shall be taken to extinguish it with the appropriate fire extinguisher, provided that the person feels competent to tackle the fire.

In the event that the fire cannot be tackled with the equipment provided the Fire Brigade will be called.

All outbreaks of fire shall be notified to the Environment Agency.

13. Emergency Preparedness and Response

13.1. Purpose

Given the nature of activities undertaken on site there is the potential for emergencies and accidents to arise. If these incidents are not responded to adequately they can result in breaches of legislation, policy requirements, contractual obligations and sector guidance and have a significant impact on the environment.

13.2. Dealing with an Environmental Incident / Accident

- If it is suspected an incident has occurred, investigate at once but do not take risks and stay calm
- Raise the alarm by informing the nearest supervisor/ manager
- If it is safe to do so, try to control the incident by isolating plant/equipment and closing off any valves etc. Obtain help if necessary - but do not put yourself or others at risk
- Direct all non-essential people away from the affected area
- Activate the nearest fire alarm call point if an evacuation of the premises is required
- It may be possible to deal with small incidents/spills using the appropriate spill response kit and by closing doors/covering drains etc. to contain the pollution at/close to the source (refer to 12 Steps to Spill Control in Section 12.2.2)
- For larger incidents, it may be necessary to inform the fire brigade, Environment Agency, Local Authority and/or Sewage Undertaker, depending on its nature (refer to Emergency Numbers in section 12.2.4).
- For all incidents and accidents complete an Environmental Incident Record (EMS Appendix 8)
- The Environment Agency shall also be notified without delay in line with HPL environmental permit conditions.
- Periodically review and, where necessary, revise the emergency preparedness and response procedures particularly after the occurrence of accidents or emergency situations.
- Periodically test procedures where practicable
- Conduct mock drills to reinforce training and get feedback on the effectiveness of site plans/procedures

13.2.1. Spill Kits

Spill kits will be located around site in areas where spillages are likely to occur. They must be fit for purpose and appropriate to the nature of the potential spillage.

The spill kits will be checked during the site inspection to ensure that adequate materials and PPE are available. Spill kits should never be used for any other purpose other than to clean-up/contain a spill. Spillages should never be hosed down and all minor and major spills must be reported. Consider

various scenarios and how the '12 steps to Spill Control' (see section 13.2.2) may occur in different sequences depending on the type of spill that has occurred on site.

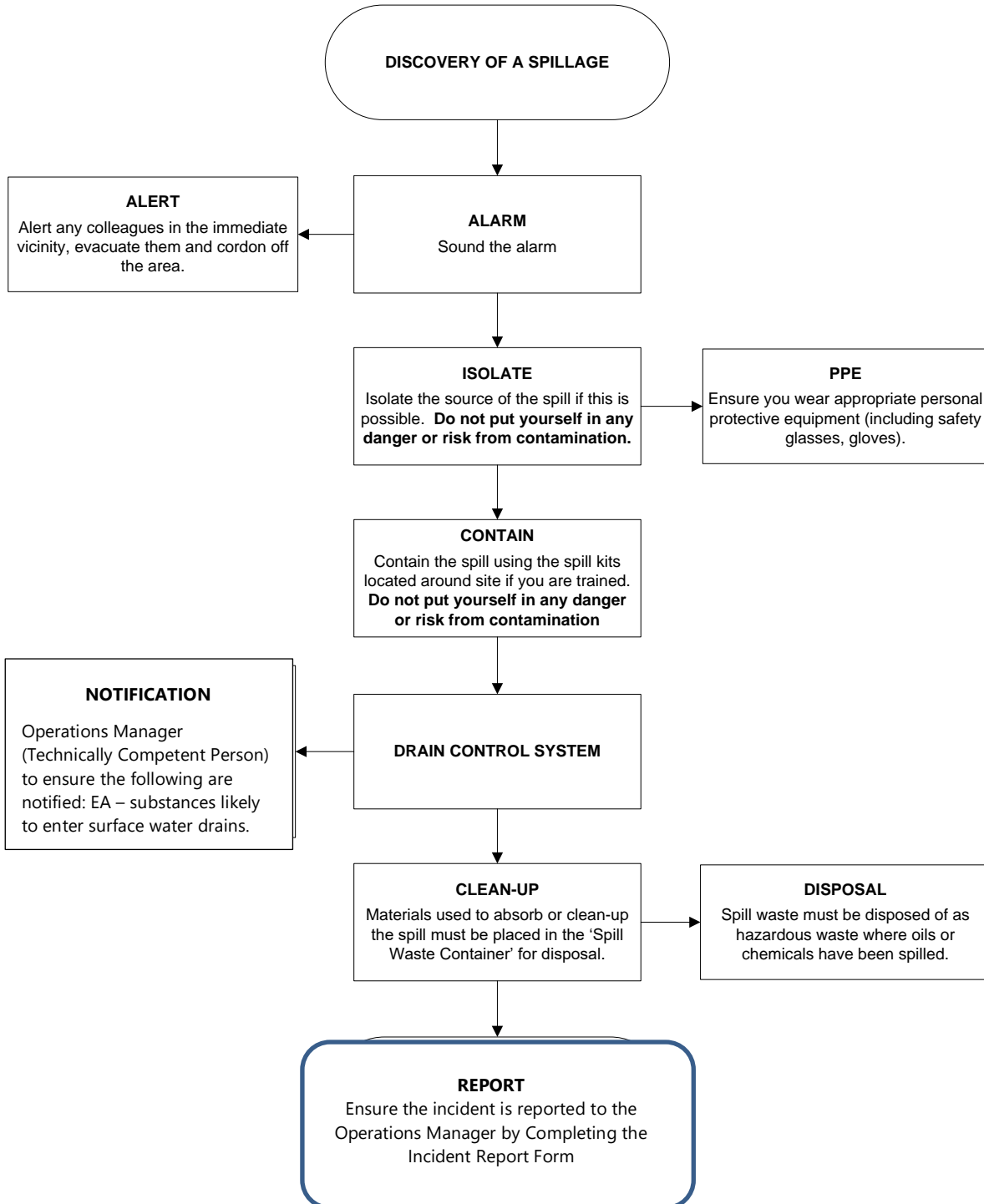
13.2.2. 12 Steps to Spill Control

The following measures must be taken in the event of a spillage.

1. Be aware of any possible spills
2. Raise the alarm and ensure everyone is aware a spill has occurred
3. Identify the spilled material
4. Identify and use the appropriate PPE to deal with the spill
5. Ensure medical assistance is sought if someone has been injured
6. Cut off the source of the spillage to prevent further escape
7. Contain the spill using an appropriate spill kit
8. If the spill has caused pollution to the environment / watercourse follow HPL permit requirements
9. Contain/Clean up the spill using the spill kit
10. Dispose of spilled material to the correct waste stream. Ensure the correct documentation is used
11. Restock spill kit immediately
12. Complete an Environmental Incident Report Form in (EMS Appendix 8), investigate the cause of the spill and implement control measures identified.

A spill response team should be appointed who will carry out a mock spill at regular intervals along with a spillage toolbox talk. The mock spill can be a planned or non-planned event. Those involved in the mock spill drill should sign up to the toolbox talk and be recorded on the training matrix (EMS Appendix 5).

13.2.3. Spill Procedure



13.2.4 Emergency Contact Numbers

EMERGENCY SERVICES		Office Hours	Out of hours
Emergency		999	999
Medical:		999	999
Police:		999	999
Fire:		999	999
REGULATORS		Office Hours	Out of hours
Health and Safety Executive (HSE)		0300 003 1747	0151 922 9235
Local Authority: Sheffield City Council		0114 203 9561	
Environment Agency (EA) (Local)		0370 850 6506	n/a
EA (24 hour Incident hotline)		0800 80 70 60	0800 80 70 60
UTILITY / KEY SERVICES	Name	Office Hours	Out of hours
Water sewage undertaker	Yorkshire Water	Emergencies (24hrs) 0345 124 2424	Emergencies (24hrs) 0800 573 553
Spillage Response	Tom Hamilton	07976 624 263	07976 624 263
HPL Representative	Name	Office Hours	Out of hours
Managing Director	Tom Hamilton	07976 624 263	07976 624 263

13.2.5 Investigation of Environmental Accidents, Incidents and Near Misses

All incidents (i.e. odour or noise pollution outside the site or spillage of polluting liquids onto the ground, or at a site of special scientific interest, or to drain or a watercourse) must be investigated as soon after the event as possible. Near misses which do not cause environmental harm, but which had the potential to must be recorded. An Incident Report Form (EMS Appendix 8) must be completed after an accident, incident or near miss to record the facts and detail of any immediate actions that have been taken to mitigate/rectify the situation. This also includes rejected waste loads which must be recorded on the rejected loads database (EMS Appendix 8) and sent to the

Environment Agency on a monthly basis. Any further action taken as a result of the incident must be recorded.

Completed Incident Report Forms must be given to the Operations Manager for review to ensure that all necessary control measures and staff training have been implemented to prevent any recurrence. These will be recorded on the non-conformity database (EMS Appendix 8). Accidents and incidents will also be discussed at the monthly Environmental Management Meetings to:

- Ensure that the causes of a particular incident have been rectified
- Ensure that the preventive measures implemented are adequate
- To determine whether any specific breaches of legislation have occurred
- Increase the company's knowledge and awareness
- Demonstrate to the enforcement agencies that the incident has been taken seriously

14. Environmental Monitoring

HPL will monitor on a regular basis the activities taking place on site which may give rise to environmental harm.

14.1. Environmental Site Inspections

Monthly environmental site inspections will be undertaken to determine that site is compliant with applicable environmental legislation and to determine any risks on site. Details of the inspection should be recorded using the Environmental Site Inspection Form (EMS Appendix 11). Where practical any issues identified will be resolved there and then. For issues which cannot be resolved they will be brought to the attention of the Managing Director and added to the non-conformance database.

14.2. Maintenance Checklist

A maintenance schedule will be produced for each item of plant used on site. The Technically Competent Manager will be responsible for ensuring that maintenance is carried out according to manufacturer's specification for each type of plant. A maintenance record must be completed to demonstrate that maintenance checks/repairs have been carried out.

14.3. Environmental Data

Due to the nature of HPL activities and services a schedule for monitoring and measurement must be in place where appropriate for parameters and inspections, and adhered to on a regular basis. At a minimum the following must be monitored / inspected / carried out:

- Regular environmental site inspections
- Environmental Permit Conditions
- Use of raw materials (fuel)
- Electricity usage
- Water usage
- Waste Duty of Care Audits
- Non-conformities and corrective actions
- Total amounts of waste sent for recycling, recovery and disposal
- Waste returns

14.4. Monthly Environmental Meetings

Monthly meetings will be held with the following members of staff:

- Managing Director
- Operations Manager (Technically Competent Manager)
- Weighbridge Operative

The agenda items to be discussed will include:

- Compliance with environmental permit
- Review of environmental action plan and on-going improvements
- Environmental training
- Environmental Incidents / complaints
- Results of any environmental inspections and surveys

Minutes of the meeting will be recorded and circulated to all attendees.

15. Environmental Records

15.1. Purpose

HPL will ensure that all environmental and waste records are identifiable, readily available, retrievable, and maintained in accordance with the appropriate legislation and site requirements.

Having relevant documents on file for the required lengths of time will ensure effective environmental management occurs and traceability can be accounted for.

15.2. Procedure

All records must be

- Legible, identifiable and traceable to the activity, product or service involved
- Stored and maintained to ensure that they are readily retrievable and protected against damage, deterioration and loss
- if amended, be amended in such a way that the original and any subsequent amendments remain legible, or are capable of retrieval be retained, unless otherwise agreed in writing by the Environment Agency, for at least 3 years from the date when the records were made, or in the case of the following records until permit surrender:
 - off-site environmental effects; and
 - (ii) matters which affect the condition of the land and groundwater
- Permanently archived after the retention period has expired
- Records may be kept for longer than the retention period if the record keeper feels it appropriate
- HPL shall keep on site all records, plans and the management system required to be maintained by the permit, unless otherwise agreed in writing by the Environment Agency
- Records are not to be removed from the nominated storage locations unless the nominated responsible person(s) provides authorisation. All records must be kept on file for the allocated time period

16. EMS Review and Update

16.1. Purpose:

To ensure continued best practice and compliance with all legal and policy requirements, contractual obligations, and sector guidance and to reduce the environmental impacts from site operations and activities.

16.2. EMS Requirements:

All elements of the EMS should come under review to ensure that any amendments required in order to keep the policy up-to-date with constantly changing legal and policy requirements, contractual obligations and sector guidance are addressed within the scope of the EMS.

All EMS reviews should be formally documented and retained on file for future reference.

Any alterations or amendments to the EMS identified as required during the annual review must be communicated to all staff, contractors and the EA where applicable.

An annual management review will also take place with Senior Managers to review the suitability, effectiveness and continuity of the environmental manual. The following will also be included as part of the agenda items:

- Results of internal audits
- Communication with external parties (e.g. regulators), including complaints
- Environmental performance of the company
- Objectives and targets and whether they have been achieved
- Status of corrective and preventative actions
- Changing circumstances
- Accidents and incidents
- Improvements to site
- Compliance with environmental permit