

Summary of Environmental Management System & Management Structure

Environmental Management System

AO Recycling Ltd has established a new processing facility to separate plastics derived from the processing of domestic appliances. An in-house environmental management system is in place initially which will be developed in the longer term to become ISO14001 accredited. The management system is described in section 2 of the BAT-Operating Techniques document submitted with the variation application.

AO Recycling will operate an in-house Environmental Management System (EMS) which will ensure that:

- the risks that the activities pose to the environment are identified;
- the measures that are required to minimise the risks are identified;
- the activities are managed in accordance with the management system;
- performance against the management system is audited at regular intervals; and
- the Environmental Permit is complied with.

The company's Environmental Policy clearly defines AO Recycling's commitment to continual improvement, to minimising the impact of the site activities on the environment and to complying with relevant legislation and other requirements to which the company subscribes.

The management system will be reviewed at least once every four years or in response to significant changes to the activities, accidents or non-compliance. The management system will be supplemented by the BATOT document which outlines the proposed operating techniques at the site and demonstrates conformance with the requirements of Environment Agency (EA) guidance.

The EMS will include procedures as outlined in the EA's Develop a management system: environmental permits guidance (April 2018). Accordingly, the EMS will include:

- Senior Management Commitment Statement
- Environmental policy (including commitment to the continuous improvement of the environmental performance of the facility)
- Planning and establishment of the necessary procedures, objectives and targets, in conjunction with financial planning and investment;
- Environmental Risk Assessments;
- Fire Prevention Plan
- Site Infrastructure Plan
- Site Operations Procedures
- Waste Storage Plan
- Site and equipment maintenance plan
- Contingency plans

- Accident prevention and management plan
- A changing climate plan
- Complaints procedure
- Staff competence and training records
- Record keeping
 - permits issued to the site
 - other legal requirements
 - risk assessments
 - management system plans
 - operating procedures
 - staff competence and training (for example qualifications, courses attended)
 - emissions and any other monitoring undertaken (for example emissions to air data)
 - 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
 - certification audit reports and any actions carried out
 - Waste Duty of Care records
- Site Condition Report
- Management System Review by senior management, of the EMS and its continuing suitability, adequacy and effectiveness following the development of cleaner technologies
- Site Closure Plan including consideration for environmental impacts from the eventual decommissioning of the installation at the stage of designing a new plant, and throughout its operating life.
- Checking performance and taking corrective action, paying particular attention to:
 - monitoring and measurement;
 - corrective and preventative action;
 - maintenance of records;
 - independent (where applicable) internal and external auditing in order to determine whether or not the EMS conforms to planned arrangements and has been properly implemented and maintained;
- Application of sectoral benchmarking on a regular basis.
- Waste stream management plans;

When implementing the EMS' procedures, AO Recycling Ltd will pay particular attention to:

- structure and responsibility;
- recruitment, training, awareness and competence;

- communication;
- employee involvement;
- documentation;
- effective process control;
- planned regular maintenance programmes;
- emergency preparedness and response; and
- safeguarding compliance with environmental legislation.