# **Environmental Management System**

# Prepared on Behalf of: Scrapco Metal Recycling Limited

Site Name:

**Longfield Farm** 

**Old Hay** 

**Brenchley** 

Kent

**TN12 7DG** 

Environmental Permit Application Reference: EA/EPR/DB3802XQ/V002

#### **DOCUMENT CONTROL SHEET**

Site:	Paddock Wood		
Project:	Environmental Compliance		
Title	Environmental Management System		
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**Distribution List:** 

None

# **Key Site Information**

SITE DETAILS				
Location: Longfield Fari	m	Operator: Scrapco Metal Recycling Limited		
Postcode: TN12 7DG				
		Office Hours (specify)	Out of hours	
Compliance Manager	Shane Tasker	01825 831488	01892 831488	
Depot Manager Danny Hunn		01892 831485	01892 831485	
EMERGENCY SERVICES		Office Hours	Out of hours	
Police, Fire Ambulance:		999	999	
REGULATORS		Office Hours	Out of hours	
Environment Agency (emergency hotline)		0800 80 70 60	0800 80 70 60	

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#### 1 Introduction

1.1.1 This Environmental Management System has been produced in accordance with Environment Agency Guidance 'Develop a management system: environmental permits' Last updated 3 April 2018.

Table 1: Develop a Management System & Environmental Management System Cross Reference

Develop a Management System Guidance Contents	Environmental Management System Sections
Site Infrastructure	Section 1.7
Site Operations	Sections 3-8
Site Equipment Maintenance Plan	Section 11
Contingency Plan	Section 12
Accident Prevention & Management Plan	Sections 13-18
Complaints Procedure	Section 15
Managing Staff Competence & Training Records	Sections 1.5 & 10
Keeping Records	Section 11
Review Your Management System	Section 19
Site Closure	Section 12

#### 1.2 Interpretation

1.2.1 'Responsible Person' means any person responsible for monitoring and reporting as detailed in this EMS (Directors/Compliance Team/Technically Competent Manager/Site Manager/Supervisor).

#### 1.3 General Management

- 1.3.1 Activities will be operated and managed in accordance with this site-specific Environmental Management System (EMS), an approved Fire Prevention Plan and the governing Environmental Permit, using sufficient competent persons and resources.
- 1.3.2 All employees having duties that are or may be affected by the matters set out in this EMS will have access to a copy of this document and the governing permit.

  Documentation will be clearly labelled and displayed within the Site Office.

#### 1.4 Implementation and Operation

- 1.4.1 Sufficient resources essential to the effective implementation and update of this EMS will be put in place and maintained. At least one Responsible Person is present when the site is operational.
- 1.4.2 Training needs have been identified to ensure that all personnel whose work may contribute towards the safe and compliant operation of the site have received appropriate training.

#### 1.5 Sufficient Competent Management

- 1.5.1 Sufficient competent management will be maintained and the minimum TCM attendance requirements will be met.
- 1.5.2 Continuing competence will be maintained and records demonstrating this will be kept on site.

#### 1.6 Checking & Corrective Action

1.6.1 A Responsible Person will handle and investigate any incidents that may result in non-compliance with this EMS, taking action to mitigate any impacts caused and initiating and completing any corrective/preventive action required. Any such action will be used to inform changes in documented procedures.

#### 1.7 Site Infrastructure

Table 2: Site Infrastructure Provisions

Provisions	Description			
Interceptor	Sealed drainage to interceptor.			
Drainage Runs/Gullies	Impermeable surface is laid to fall so that any spillages are collected in the interceptor via drainage runs.			
Security	Concrete walls and palisade fencing perimeter fencing with lockable access gate.			

#### 1.8 Equipment Inventory

<u>Table 3:</u> Critical Equipment Inventory (Indicative)

Onsite Provisions				
Processing Plant (Trommel/Picking Station/Shredder/Baler)				
Selector Grabs Material Handlers				
Wheeled Loaders				
Forklift				

N.B. Neither a prescriptive nor an exhaustive list.

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# 2 Environmental Legal Register

<u>Table 4:</u> Environmental Legal Register (Not an exhaustive list of requirements)

Legislation	Summary/Obligations	Compliance	Responsibilities
Legislation	Summar y/Obligations	Documentation Location	Responsibilities
Environmental Permit	Overarching Permit that stipulates the conditions under which the site must operate.	Copy of Permit held within the Site Office. Compliance documentation includes this Environmental Management System.	Responsible Person
Waste Carriers Licence	Waste management companies moving wastes must be registered as an 'upper tier' waste carrier.	Copy of registration is held within the Site Office.	Responsible Person
Environmental Permitting Regulations 2016 (As Amended)	ermitting Regulations for waste management		Responsible Person
The Waste (England and Wales) Regulations 2011 Waste Hierarchy (As Amended)  Amended)  Overarching Legislation for the management and handling of waste.  Ensure waste is managed as far up the waste hierarchy as possible. Evidence should be retained within the Site Office to support any minor deviations.		Compliance with the waste hierarchy is assured by the depollution procedures detailed within this Environmental Management System & all transfer notes include the required declaration.	Responsible Person
The Environmental Protection Act 1990: Copies of all non- hazardous waste Duty of Care waste transfer notes must be kept on site for 2 years.	Overarching Legislation for waste management activities. Duty of Care requirement for the movement of all waste, (not required for internal movements or movements within the same company). These must be kept for two years.	All Duty of Care waste transfer notes are held in the Site Office for two years.	Responsible Person

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The Hazardous Waste	Overarching legislation	All hazardous waste	Responsible
Regulations 2005:	for wastes that are	Consignment Notes are	Person
Hazardous Waste	classified as hazardous.	kept within the Site	
Consignment Notes	Hazardous waste must	Office for three years.	
(Recommendation that the EA template for Consignment Notes is used)	not be mixed with other hazardous or non-hazardous wastes. A Consignment Note must accompany all hazardous waste movements and copies must be kept on site for 3 years.		
Landfill Tax Assessment	Overarching legislation	All ignition test results &	Member of the
(LOI Test)	regarding the tax	audit trail	Management
	associated with	documentation held in	Team
	disposing of wastes at	the Office	
	landfill (cheaper tax for	(abnormal generation).	
	those materials that can		
	be considered inert).		

# **3 Operations**

# 3.1 Specified Waste Management Operations

3.1.1 Waste management operations are listed in <u>Table 5</u>.

<u>Table 5:</u> Specified Waste Management Operations

Operational Codes	Activity			
R3: Recycling/reclamation of organic	Physical treatment including manual and mechanical sorting/ separation, screening, baling, shredding, crushing or compaction of non-hazardous waste for disposal (no more than 50 tonnes per day) or recovery.			
substances which are not used as solvents				
R4: Recycling/reclamation of metals and				
metal compounds	than 50 tollies per day) of recovery.			
R5: Recycling/reclamation of other	Subject to any other requirements of this permit wastes shall			
inorganic materials	be stored for no longer than 1 year prior to disposal or 3 years			
R13: Storage of wastes pending any of the	prior to recovery.			
operations numbered R1 to R12 (excluding				
temporary storage, pending collection, on	No more than 50 tonnes per day of non hazardous waste to be treated at the site under a D9 activity.			
the site where the waste is produced).	be treated at the site under a by activity.			
D9 Physico-chemical treatment not	No more than a total of 50 tonnes of intact and shredded			
specified elsewhere which results in final	waste vehicle tyres (waste codes 16 o1 o3 and 19 12 o4) shall			
compounds or mixtures which are	be stored at the site.			
discarded by means of any of the				
operations numbered D1 to D12				
D14 Repackaging prior to submission to any				
of the operations numbered D1 to D13				
D15: Storage pending any of the operations				
number D1 to D14.				

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#### 4 Permitted Wastes

4.1.1 Primary waste types received onsite are presented in <u>Table 6</u> below with associated waste codes.

**Table 6:** Permitted Waste Types

Waste							
Description	Waste Category EWC Code					Handling Advisory	
Cardboard/Paper	03 03 07	03 03 08	15 01 01	1	19 12 01	20 01 01	Store separately for onward management. Fire Risk Material.
Green Waste	02 01 0	93	02 01 (	07		20 02 01	Store separately for composting off site. Fire/Dust/Odour Risk Material.
Glass	10 11 03	10 11 11	10 11 12	+	5 01 07	16 01 20	Specified Waste (some).
	17 02 02	17 02 04	19 12 05	2	0 01 02		
Gypsum Plasterboard			17 08	02			Store separately for onward management.
	01 01 01	01 01 0	01 03	06	01 03 09	01 04 08	Specified Wastes.
	01 04 09	01 04 1	11 01 04	12	01 04 13	02 04 01	
Inert Wastes &	10 01 24	10 11 1	2 10 12	80	10 13 14	15 01 07	May give rise to dust if stored outside
Soils	17 01 01	17.01.0	17.01	.03	17.01.07	17 02 02	and allowed to dry out.
	17 03 02	17 05 C	17 05	08	19 01 19	19 12 05	_
	19 12 09	20 01 0	20 02	02			
	02 01 10	12 01 0			12 01 03	12 01 04	Store separately for onward
Metal Scrap	15 01 04	16 01 1	7 16 01	18	17 04 05	17 04 07	management.
(Ferrous)	19 01 02	19 10 0	19 10	02	19 12 02	19 12 03	
	20 01 40						
Metal Scrap (Non-	02 01 10	12 01 0			15 01 04	16 01 17	Store separately for onward
Ferrous)	17 04 05	17 04 0	7 19 01	02	19 10 01	19 12 02	management.
	20 01 40						
	02 01 04	07 02 1	12 01	05	15 01 02	17 02 03	Store separately for onward
Plastics	20 01 39						management.
	20 01 39						Fire Risk Material.
PVC	07 02 13	16 01 1	9 17 02	03	19 12 04	20 01 39	Store separately for onward management. Fire Risk Material.
Tyres		16 01 03 19 12 04			19 12	Fire Risk Material.	
Double Glazed Units/External Plastics (uPVC)			17 02	17 02 03			Store separately for onward management. Fire Risk Material.
Wood	02 01 03	02 01 0	07 03 01	05	03 03 01	15 01 03	Wood users offer higher premium for clean untreated wood such as pallets
	17 02 01	19 12 0	7 20 01	38	20 02 01		as from plywood and chipboard. Separate where possible. Fire/Dust/Odour Risk Material.

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## 4.2 **Specified Wastes**

4.2.1 Specified wastes are presented within <u>Table 7</u> below. These wastes may be treated and stored outside in the yard area on a hardstanding surface or an impermeable surface with sealed drainage.

**Table 7: Specified Wastes** 

Waste Code	Waste Description
01 01 01	Wastes from mineral metalliferous excavation
01 01 02	Wastes from mineral non-metalliferous excavation
01 04 08	Waste gravel and crushed rocks
01 04 09	Waste sand and clay
01 04 13	Wastes from stone cutting and sawing
02 04 01	Soil from cleaning and washing sugar beet
10 11 12	Waste glass from manufacture of glass products
10 12 08	Waste ceramics, bricks, tiles and construction products from manufacture (after thermal processing)
10 13 14	Waste concrete from manufacture
15 01 07	Glass packaging
17 01 01	Concrete
17 01 02	Bricks
17 01 03	Tiles and ceramics
17 01 07	Mixtures of concrete, bricks, tiles and ceramics
17 02 02	Glass from construction
17 03 02	Bituminous mixtures
17 05 04	Soil and stones
17 05 08	Track ballast
19 12 05	Glass from mechanical treatment of waste
19 12 09	Aggregate Only
20 02 02	Soil and stones

**Table 8:** Maximum Permitted Throughput

Waste Category	Annual Tonnage
To not exceed:	100,000 (Permitted)

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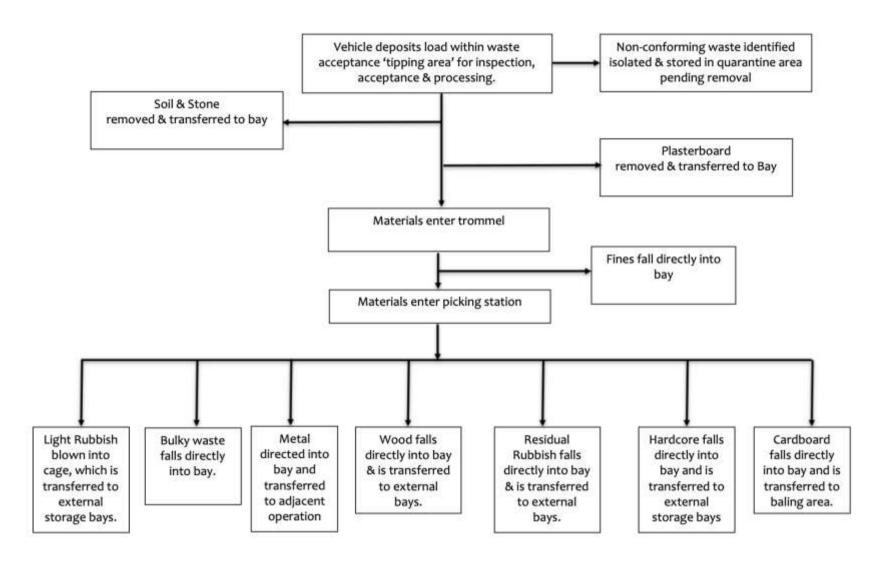


Figure 1: Operational Flow Diagram

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#### **5 Waste Acceptance Procedures**

- 5.1.1 Compliance with the permitted waste types is assured by the following measures:
  - 1. When a skip/container is hired prohibited material is clearly stated and reflected in terms & conditions of hire;
  - 2. When collecting the full skip/container the driver will inspect and check to see if any prohibited material is present. If it is, the customer will be notified and advised of the following courses of action available:
    - a) Removed and left at the customers premises
    - b) Accepted and disposed of directly to a site permitted to accept the waste
  - 3. On delivery to site the driver will hand all paper copies of any Duty of Care Documentation to the Weighbridge Office; and
  - 4. Once all Duty of Care Documentation has been approved the wastes will be deposited in the Waste Acceptance Area for inspection, acceptance & processing (machine operatives will spread out the loads to aid the visual inspection process).
- 5.1.2 If any prohibited materials are present the following course of action will be taken:
  - a) Require the non-permitted materials to be loaded back onto the delivery vehicle for return to the hirer; or
  - b) Accept, isolate & arrange for removal to an authorised waste management facility.
  - c) Under no circumstances will non-permitted wastes be retained on site and dealt with as if it is permitted.
  - d) The Agency will be notified if a delivery is rejected.
- 5.1.3 If the prohibited material becomes apparent only after the above waste acceptance checks have been completed the following action will be taken:
  - a) The load will be isolated within the isolation facility (appropriate PPE will be worn if necessary) and removed from site to a suitably permitted facility at the earliest opportunity.
  - b) In each case, the incident will be recorded on the Weekly Compliance Inspection Check Sheet (taking note of the vehicle registration, date & time of the incident). If identifiable, the individual will be notified of the event and reminded of the terms on which waste is accepted onto site. (It will be at the discretion of the Management Team if they wish to ban an individual/company following an incident).

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- c) Under no circumstances will prohibited waste be retained on site and dealt with as if it is permitted.
- d) The Agency will be notified if a delivery is rejected.

#### 5.2 Rejection Procedure

- 5.2.1 Any wastes identified as being unsuitable for disposal at the site will be rejected & recorded on the Weekly Compliance Inspection Check Sheet.
- 5.2.2 A record will be kept of the following pieces of information:
  - a) Date & time
  - b) Person rejecting the waste(s)
  - c) Haulier/customer name and address including carriers' number
  - d) Vehicle registration number
  - e) Procedure name and address
  - f) EWC number
  - g) Transfer Note Number
  - h) Waste Description

#### 5.3 Fibrous Asbestos Procedure

- 5.3.1 If asbestos is detected the following procedures will be followed:
  - I. Isolate, if safe to do so, while using appropriate PPE.
  - II. Dampen down utilising water provisions to prevent fibres/particulates being released.
  - III. Contact a specialist contractor to isolate/remove asbestos from site immediately.
  - IV. In the event of fibre release, the site will be evacuated until a specialist contractor has dealt with the risk. The Environment Agency and the Environmental Health Officer will be notified immediately.
  - V. Notify Regulatory Authorities when the asbestos has been removed off site and the site has recommenced operations.
  - VI. Complete a Non-Conformance Record Form and an Accident & Incident Investigation Report.
  - VII. Provide written confirmation of the event and outcome to the Agency within 24 hours, completing form in <u>Appendix EMS5</u>.
  - VIII. Details of all such incidents will be recorded on the Weekly Compliance Inspection Check Sheet and records of removals are kept within the site office. In each case a record of the incident will be noted including time, description and carrier.

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#### 6 Storage Management

- 6.1.1 All wastes are stored in designated storage areas/bays/containers and within the confines of the site.
- 6.1.2 All waste management operations are conducted on an impermeable surface with sealed drainage.
- 6.1.3 Specified wastes can be accepted, stored & treated on a hardstanding surface benefitting from passive drainage.

#### 7 Despatch Procedure

- 1. Wastes stored within bays/containers/areas will be placed within the despatch vehicle using mechanical equipment.
- 2. Containers will be loaded directly onto the collection vehicle.
- 3. Once loaded, vehicles move to the weighbridge, the weight is recorded and the vehicle sheeted for despatch.
- 4. All drivers will inspect their loads prior to leaving the site to prevent spillages of waste or debris on the entrance/exit roads of the site.

## 8 End of Day Site Close Down Procedures

- 8.1.1 A Responsible Person will ensure that: -
  - 1. All mobile plant is at a minimum safe distance from any risk areas, including any accumulations of combustible materials.
  - 2. All plant and equipment is switched off.
  - 3. There are no visible signs of flames, smoke or embers onsite.
  - 4. All non-essential equipment & lighting within the site is switched off.
  - 5. No one remains on site during non-operational hours.

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#### 9 Duty of Care

- 9.1.1 Scrapco Metal Recycling Limited takes its Duty of Care responsibilities seriously and understands them to require it to: -
  - 1. Check the authorised status of all waste carriers utilised;
  - 2. Ensure that wastes leaving the site are going to a suitably authorised facility;
  - 3. Complete compliance status checks from time to time;
  - 4. Produce & maintain appropriate records relating to wastes received and removed.

#### 9.2 Notification

- 9.2.1 Scrapco Metal Recycling Limited will notify the Environment Agency without delay in the event of detecting any of the following: -
  - 1. Any malfunction, breakdown or failure of equipment or techniques, accident or emission of a substance not controlled by an emissions limit which has caused, is causing, or may cause significant pollution;
  - 2. The breach of a limit specified in the Permit;
  - 3. Any significant adverse environmental effects.
- 9.2.2 The Environment Agency will be notified without delay with written confirmation (i.e., an email & telephone conversation with the local Enforcement Officer) of such incidents, which must be submitted within 24 hours.
- 9.2.3 The Environment Agency will be notified within 14 days of the occurrence of the following matters, except where such disclosure is prohibited by Stock Exchange Rules.

Where the operator is a registered company: -

- Any change in the operator's trading name, registered name or registered office address; and
- Any steps taken with a view to the operator going into administration, entering into a company voluntary arrangement or being wound up.

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#### 9.3 Avoidance, recovery and disposal of wastes produced by the activities

- 9.3.1 The requirements laid down by The Waste Regulations 2011 will be complied with as far as possible and in particular:
  - a) Waste managed by the activities.
  - b) All waste generated by operations conducted on site will be dealt with in accordance with the waste hierarchy; and
  - c) If disposal is necessary, a manner will be selected which reduces the potential impact on the environment.
- 9.3.2 All wastes generated will be quantified & characterised using appropriate competence.
- 9.3.3 Any hierarchy deviations will be justified and recorded.
- 9.3.4 Every three years a Company Director will review all arrangements & practices around the management of wastes. Steps identified by such a review will be implemented as necessary & deemed appropriate to operational compliance.

#### 9.4 Site Security

- 9.4.1 Site security arrangements include a mixture of concrete perimeter walls & palisade fencing with a lockable access gate.
- 9.4.2 CCTV cameras are in operation 24-hours a day.
- 9.4.3 Outside operational hours the site access gates are shut and securely locked and the site is remotely monitored.
- 9.4.4 Directors constantly evaluate all on site security arrangements.

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# 10 Training

- 10.1.1 A Responsible Person completes a training needs assessment to ensure all new employees have the required training to complete their day-to-day tasks correctly & safely; these needs are presented at <u>Table 9</u> below.
- 10.1.2 Training records are held within the Office.

<u>Table 9:</u> Training Matrix (Recommendations)

Training Requirements			Operatives
	Permit Requirements		
Internally Completed Training ('Tool Box Talks')	Fire Prevention Plan		
	Environmental Management System		
	Procedures		
	Mechanical Equipment		
Externally Accredited Training	First Aider		
Externally Accredited Training	Fire Marshall		
	Fire Awareness		

<u>Key</u>		
Required		
Not		
Required		

#### 11 Maintenance

#### 11.1 Daily Checks

- 11.1.1 All mechanical equipment is inspected on a daily basis prior to the commencement of operations.
- 11.1.2 Defects are raised & recorded as appropriate.
- 11.1.3 If repairs cannot be completed on site an appropriate external contractor (dependent on the type of malfunction) will be contacted to effect a repair.

#### 11.2 Weekly Checks

- 11.2.1 A Responsible Person will undertake a thorough inspection of all critical site infrastructure & equipment on a weekly basis, which is recorded on the Weekly Compliance Inspection Check Sheet (See Appendix EMS1).
- 11.2.2 If a repair cannot be completed on site then the faulty item will be isolated and arrangements made for repairs to be completed as soon as practicable.

#### 11.3 Annual Checks

- 11.3.1 Routine mechanical maintenance is scheduled against the records kept in the Office. These records determine the frequency at which inspections take place.
- 11.3.2 All records are kept in the Office.

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# 11.4 Maintenance Checklist

Table 10: Maintenance Checklist

	Frequency					
Maintenance	Day	Week	Month	Year	5 years	Location of Instructions
		Interr	nal			
Clean up spills on surfaced areas.	0					Office
Inspect integrity of site security perimeter		R				Office
Inspect integrity & state of site surfaces/access road		R				Office
Clean site surfaces to prevent 'track-out'.	0					Office
Inspect storage areas	0	R				Office
Inspect electrical equipment		R				Office
Inspect fire fighting equipment		R				Office
Inspect integrity of drainage channels		R				Office
Inspect integrity of interceptor			R			Office
		Exteri	nal			
Operational Fleet (Servicing/MOT)				E		Office
Excavator/Wheeled Loader/Forklift (LOLER)				E		Office
Fire extinguishers				E		Office
PAT testing				E		Office
Electrical Wiring					E	Office

<u>Key</u>	
Operative	0
Responsible Person	R
External Contractor	E

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# 12 Contingency Planning

Table 11: Contingency Measures

Eventuality	Procedures/Measures					
Accident	Measures may include: -					
	1. The affected area will be isolated.					
	2. If necessary, the emergency services will be contacted.					
	3. A Responsible Person will decide on a case-by-case basis if cessation of operations around					
	the affected area is necessary until the appropriate measures have been taken and/or the					
	emergency services have arrived.					
Supply Chain	Measures could include: -					
Failure	<ol> <li>Confirm current storage times for materials accumulated on site.</li> </ol>					
(Including	2. Increase monitoring of material stockpiles on site.					
Transportation	<ol><li>Contact outlets for the specified stream and arrange transportation.</li></ol>					
Shortages)	4. If the outlet is not receiving the specified waste stream contact other outlets.					
Breakdowns	Measures could include: -					
(Mechanical	1. Immediate isolation of the affected machinery.					
Equipment)	2. Deploy absorbents if required.					
	3. External contractors instructed to complete repairs.					
	4. Hire in relief equipment in interim if needed.					
	5. Reschedule material despatch to align with scheduled repairs and/or relief machinery					
	availability.					
Site Closure	Measures could include: -					
	<ol> <li>Appropriate signage will be erected; notifying any visitors that operations have been suspended.</li> </ol>					
	2. Advise customers of the situation.					
	3. Wastes will not be accepted on to site.					
	4. Contact all potential outlets to ensure that all waste material is managed in accordance with					
	the waste hierarchy where possible.					
	5. Notify EA that customers & receiving outlets have been contacted and provide scheduled					
	dates for material removal.					
	6. Notify EA once stockpiles have been reduced to acceptable level.					

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#### 13 Emissions Management

13.1.1 Control of emissions of substances not controlled by emission limits as follows: -

Emissions of substance not controlled by emissions limits (excluding odour) shall not cause pollution. The operator shall not be taken to have breached this rule if appropriate measures, including, but not limited to, those specified in any approved emissions management plan, have been taken to prevent or where that is not practicable, to minimise, those emissions.

All liquids in containers, whose emissions to water or land could cause pollution, shall be provided with secondary containment, unless the operator has used other appropriate measures to prevent or where that is not practicable, to minimise, leakage and spillage from the primary container

13.1.2 This section of the site EMS addresses any potential emissions that may arise from site operations. It demonstrates the measures taken to prevent or minimise the release of emissions such that they do not cause pollution as required by Condition 3 & defined in Condition 4.4 Interpretation:

"Pollution" means emissions as a result of human activity, which may: -

- (a) Be harmful to human health or the quality of the environment,
- (b) Cause offence to a human sense,
- (c) Result in damage to material property, or
- (d) Impair or interfere with amenities and other legitimate use of the environment.

#### 13.2 Monitoring

- 13.2.1 Responsible Persons will remain mindful of the potential impact operations could have on the local environment and take all reasonable steps to avoid giving rise to pollution or nuisance as a consequence of site operations.
- 13.2.2 In the event of ongoing issues or concerns being identified these will be investigated and appropriate actions implemented. This may include the formulation of management plans.
- 13.2.3 In the event of an emissions release that has caused, is causing, or may cause significant pollution, the Environment Agency will be notified within 24 hours, advice taken and action recorded.

#### 13.3 Dust Emissions

13.3.1 Revert to the Dust Emissions Management Plan for onsite controls & procedures with regards to this emissions type.

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#### 13.4 Odour Emissions

13.4.1 Revert to the Odour Emissions Management Plan for onsite controls & procedures with regards to this emissions type.

#### 13.5 Noise & Vibration Emissions

- 13.5.1 The overall noise emissions amenity impact is considered to be low, due to the isolated nature of the operation & on site controls/procedures.
- 13.5.2 Noise generated on the site would principally be associated with the operation of mechanical equipment.
- 13.5.3 Maintenance inspections are carried out on all equipment and machinery.

  Any malfunctions or defects are therefore identified at the earliest opportunity.

#### 13.6 Noise

13.6.1 The overall noise emissions amenity impact is considered to be low, due to the nature of adjacent operations & onsite controls/procedures.

#### 13.7 Noise Control

13.7.1 The procedure for deploying the Noise & Vibration suppression system is as follows:

#### **Proactive**

- 1. Check site conditions for Noise & Vibration potential risks;
- 2. Remedial measures put in place to minimise if not eliminate the source; and
- 3. Be prepared to suspend operations giving rise to excessive Noise & Vibration.

#### Reactive

- In the event of Noise & Vibration emissions being amber or red (as detailed within <u>Table 12</u>) enact the following procedures;
- 2. Remedial measures put in place to minimise if not eliminate the source;
- 3. Cease all onsite activities (if emissions escaping the site boundary) until conditions improve;
- 4. Once Noise & Vibration levels reduce, record the incident on a Noise & Vibration Assessment Form (<u>Appendix EMS7</u>), the file for which is located within the site office; and
- 5. Report incident to the Management or Supervisor for further investigation.

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Table 12: Noise & Vibration Management Action Levels

Action	Operation	Onsite Procedures
Level	Conditions	
	Normal	No mitigation required, but ongoing monitoring by all staff
	Operating	members.
	Conditions	Daily inspections undertaken by a member of the site
		management team
	Noise &	Ongoing monitoring by all staff members.
	Vibration	Daily inspections undertaken by a member of the site
	emissions arising	management team
	from within the	
	operation	
	Noise &	Remedial measures put in place to minimise if not eliminate the
	Vibration	source.
	emissions	Cease operations giving rise to Noise & Vibration emissions if
	escaping the site	deemed necessary by Management.
	boundary.	Complete a Noise & Vibration Assessment Form ( <u>Appendix</u>
		EMS7) & Complete an Environmental Incident Report
		( <u>Appendix EMS2</u> ).

#### 13.8 Noise Monitoring

13.8.1 Operatives and a Member of the Management Team will monitor noise levels on an ongoing basis throughout the working day. Observations will be recorded in the Site Diary.

#### 13.9 Scavenging Birds

- 13.9.1 It is not expected that scavenging birds will present any significant problems as the site will not be accepting any putrescible or food wastes.
- 13.9.2 Responsible Persons will monitor conditions on an ongoing basis throughout the working day. Relevant observations will be recorded on the Weekly Compliance Inspection Check Sheet (See Appendix EMS1).

#### 13.10 Pests

- 13.10.1 The risk of infestation of pests and vermin is minimised by maintaining good general housekeeping and ensuring that the site is clean and tidy.
- 13.10.2 Responsible Persons will monitor site conditions for any signs of pest infestation.
- 13.10.3 In the event that flies or other such problematic insects are introduced to the site with incoming waste, insecticides offering rapid and long-term treatment will be utilised and the offending waste promptly removed from site.

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#### 13.11 Litter

- 13.11.1 Any escape of litter will be controlled throughout the working day and cleared immediately on identification.
- 13.11.2 Operatives complete a final inspection around the site perimeter at the end of the working day and remove any fugitive material/debris found in the access road and/or operational areas.

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#### **14 Emergency Procedures**

14.1.1 The following procedure applies to All Emergencies: -

- 1. A Responsible Person will take immediate control of any incident pending handover to the appropriate authority (if currently on site).
- 2. As much information as possible will be gathered, including names & addresses of any bystanders, & photos taken as evidence if possible.
- 3. Appropriate personal protective equipment is to be used at all times (PPE is allocated to all staff with additional supplies located within the Company Office).
- 4. Complete an Environmental Incident Record form as shown at <u>Appendix</u> EMS2.

#### 14.2 Environmental Incident Record Form Procedure

- Complete an Environmental Incident Record Form as detailed at <u>Appendix EMS2</u> in the event of any accident/incident with potential environmental implications.
- 2. Once investigations are complete any corrective action recommended is acted upon and recorded.
- 3. Once actioned, a copy of any completed form is held within the Office for at least three years.

## 15 Complaints Investigation Procedure

- 1. Complete a Complaints Record Form.
- 2. An investigation is undertaken to determine presence/absence, characteristic and intensity of the reported issue. The time of the complaint will be linked with site activities. Review the Weekly Compliance Inspection Check Sheet (See Appendix EMS1) to determine if any abnormal site operations/conditions were present at the time of the complaint.
- 3. A Responsible Person will determine any appropriate action necessary to remedy/mitigate the cause(s) of the identified complaint.
- 4. Specialist advice will be sought if deemed necessary.
- 5. Any actions taken will be recorded on the Weekly Compliance Inspection Check Sheet (See Appendix EMS1).
- 6. Written confirmation of any actual or potential pollution incidents must be submitted to the Environment Agency Permitting Officer within 24 hours of detection. (Information at front of document).
- 7. All complaint forms will be available for inspection by representatives of regulatory bodies.

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#### 16 Leakages or Spillages Procedure

- 16.1.1 On identification of a **Leak or Spillage** the following procedure is to be followed: -
  - 1. Prevent unauthorised access to the affected area.
  - 2. Prevent uncontrolled escape of potentially contaminating liquids using supply of absorbent materials to control the flow of liquids as necessary.
  - 3. If safe to do so, isolate source of leak/spillage to prevent further losses, which may involve switching off a particular piece of machinery & deploying a containment vessel (i.e., drip tray) underneath the affected area.
  - 4. If necessary, initiate controlled evacuation of the site.
  - 5. All contaminated absorbents must be placed in a leak proof container, labelled and stored pending removal.
  - 6. Seek specialist advice on decontamination of the site surfaces if necessary.
  - 7. Complete an Environmental Incident Record Form (See <u>Appendix EMS2</u>).
  - 8. Any action(s) taken will be recorded on the Weekly Compliance Inspection Check Sheet (See Appendix EMS1).
  - 9. Written confirmation of any actual or potential pollution incidents must be submitted to the Environment Agency via the Permitting Office within 24 hours. (Information at front of document).
  - 10. Confirm site clean up with the Environment Agency. (Information at front of document).
  - 11. Replenish supplies of absorbent materials as necessary.

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#### 17 Equipment & Machinery Malfunction & Failure Procedure

- 17.1.1 On identification of any <u>Equipment or Machinery Malfunction or Failure</u> the procedure to be followed is: -
  - 1. Cease operations immediately & determine if continuation of use poses a significant risk to health or the environment.
  - 2. If continuation poses a significant risk, switch off and isolate the affected piece of equipment.
  - 3. Notify a Responsible Person who will instruct the appropriate maintenance personnel or external contractor to undertake necessary repairs.
  - 4. Notify Environment Agency Permitting Officer if the malfunction or failure could cause pollutants to escape the permitted boundary. (Information at front of document).
  - 5. Complete an Environmental Incident Record Form. (See <u>Appendix EMS2</u>).
  - 6. Any action(s) taken will be recorded on the Weekly Compliance Inspection Check Sheet (See Appendix EMS1).
  - 7. Written confirmation of any actual or potential pollution incidents must be submitted to the Environment Agency via the Permitting Office within 24 hours. (Information at front of document).

#### 18 Non-Conformance Procedure

- 1. Non-conformance identified.
- 2. A Non-Conformance Record form is completed (see Appendix EMS4).
- 3. A Responsible Person initiates an investigation of the non-conformance & ascertains potential impact(s) on the environment and how serious any potential effects could be.
- 4. Once the non-conformance has been assessed, action will be taken to remedy the cause.
- 5. All actions will be recorded on the Weekly Compliance Inspection Check Sheet (See Appendix EMS1).
- 6. In the event of an emissions release that has caused, is causing or may cause significant pollution, the Environment Agency will be notified within 24 hours, advice taken and action recorded on the Weekly Compliance Inspection Check Sheet (See Appendix EMS1).

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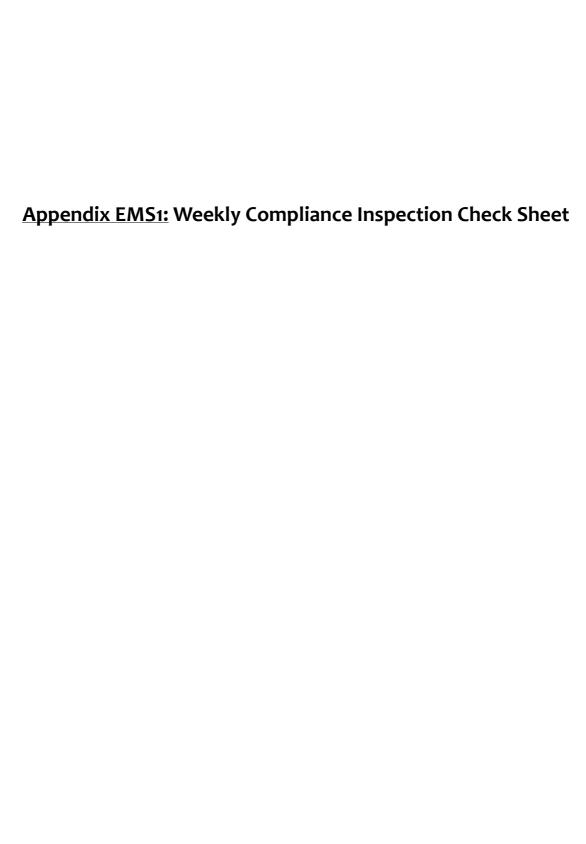
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# 19 Periodic Review

19.1.1 The adequacy of this EMS will be reviewed in light of any nonconformance. If any amendments to the EMS are required the Environment Agency will be provided with an updated version.

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**Appendix EMS2:** Environmental Incident Record Form

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# **Appendix EMS3:** Complaint Record Form

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**Appendix EMS4:** Non-Conformance Record Form

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**Appendix EMS5:** Environment Agency Notification Form

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**Appendix EMS6:** Accident Investigation Forms

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