

EP5 Regular Checks & Inspections

Scope: This procedure details the preventative measures employed to minimize the impact of leaks, spills and equipment failure on the surface water system and environment.

Responsibility: Site owner

Background: The site at Westerham Rd is enclosed within a remote site without near residential neighbours, however some spills and or waste may enter the surface water system in the workyard. Regular checks and inspections will reduce the likelihood of an accidental spillage or unwanted failure.

Item	Inspection	All ok?	Date	Comments
Drainage gullies clear of debris?	Y/N			
Oil bunds/drums in good order?	Y/N			
Absorbant granules readily available?	Y/N			
All wastes stored correctly?	Y/N			
Site entrance kept clear for emergency vehicles?	Y/N			
No mud on roadways?	Y/N			

EP7 Complaints & Neighbourly Relations

- Any abnormal emission to the environment evident, such as a notable solids to surface water or mud on roads will be recorded in the site diary.
- Any complaints received by the site, concerning emissions to the environment, will be recorded in the site diary. Any complaint made by an external source will be documented and dealt with in accordance with this procedure. It will be the responsibility of management to arrange for the complaint to be investigated, take any remedial action necessary and respond to the complaint if appropriate. Any written documents concerning the complaint will be kept for at least 2 years.
- If it is visually evident that substances (mud, dirt) are being tracked out of the site onto the public highway, steps will be immediately taken within the site to prevent further transfer of material and the public highway will be cleaned by the end of the working day. Any such event will be recorded in the site diary.
- The site boundary will be visually inspected weekly by management for litter and debris; this would be in conjunction with the weekly boundary security inspection. If any material has fallen over/ outside the boundary it will be cleared as soon as practically possible, but within a week of discovery and so prior to the next weekly inspection. Debris will be cleared on the day of discovery. The weekly checks will be recorded in the site diary.

ENVIRONMENTAL POLICY STATEMENT

Essex Utilities Ltd is firmly committed to improving their environmental performance at Westerham Rd, Westerham, TN16 2ET, and where practicable ensuring the impacts from operations on the environment and nearest neighbours are minimised.

As part of our Environmental Policy, we will:

- Implement, maintain and improve our Environmental Management System;
- Ensure conformance with this Environmental Policy and constantly monitor our environmental performance
- Meet or exceed the requirements of all environmental legislation and other requirements that are relevant to the Company;
- Ensure that employees and sub-contractors act in accordance with our Environmental Policy. The Company will implement a training program for its employees to raise awareness of environmental issues and enlist their support in improving the Company's performance.
- Seek to minimise emissions and reduce waste and prevent pollution arising from our operations, prioritising those areas where we can make most impact.

We will encourage the adoption of similar principles by its suppliers where practical.

INTRODUCTION

This manual represents the formal Environmental Management System (EMS) for Essex Utilities Ltd, The aim of the system is to achieve and demonstrate sound environmental performance by controlling the impacts of the company's activities on the environment consistent with our policy. The EMS supports compliance with the Environmental Permit

application number EPR/GB3708GR/A001 operated at the site.

Company Profile

Essex Utilities Ltd is a registered haulage and waste treatment company. The business operates from Land rear of Redlands, Westerham Rd, Westerham TN16 2ET. It carries out the crushing and grading of inert waste, soils and aggregate from excavation and local building works.

Site operating hours are as follows:

- Monday to Friday: 08.30 to 17.00;
- Saturday: 08:00 to 13.00; and
- Sunday / Bank Holidays: Closed.

Scope of System

The scope of the environmental management system covers "Crushing and Grading of Inert and Excavation Waste"

The purpose of this manual is to define the EMS, which will ensure that the company activities are conducted in a manner which will minimise adverse environmental impacts and enhance our role in environmental stewardship.

The procedures that implement the EMS apply, where appropriate, to the company activities at Essex Utilities Ltd, Westerham Rd, Westerham TN16 2ET and are operated under the same common management system.

Environmental Risks and Effects

The company has identified and documented Environmental Risks and Effects below to identify the aspects of our activities and determine those which have, or may have, a significant impact on the environment. Where necessary operational controls have been implemented to minimise any potential effect.

Legal and Other Requirements

The key legislation and other requirements which establish the main environmental control over the company's activities are defined within the Register of Environmental Legislation in. Where appropriate, operational controls have been implemented to ensure compliance with relevant legislation.

Environmental Improvement Programme

Hazard	Receptor	Pathway	Risk management	Probability of exposure	Consequence	What is the overall risk?
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Agreed objectives and targets, with defined responsibilities for their monitoring, achievement and timescales have been documented:

Environmental Objectives will be established on an annual basis taking account of:

- The Environmental Policy;
- The significant environmental aspects based on the Risk Assessment;
- Results of the Audits;
- Legislative and other requirements; and
Views of relevant stakeholders.

Operation & Maintenance

Operations and activities associated with environmental aspects are controlled by operational procedures referenced in this manual.

Accidents and Incidents

The Company has established and maintains a procedure for incident and accidents in section 1.7 of this manual.

Non-conformance, Incidents and Complaints

The Company has established and maintains a procedure for recording Non-conformance, incidents and Complaints in section 1.8 of this manual.

Environmental Risk Assessment

The risk assessment below constitutes the typical probability/consequence type risk assessment and identifies generic risks which are deemed to be applicable to the business activities of Essex Utilities Ltd.

Noise from delivery and unloading of waste	Residents living close to Westerham Rd	Air - Activities on site are potentially audible at residents properties particularly gardens	Ensure activity undertaken in accordance with operating procedures Activity location benefits from good location away from built up areas. Record and act on complaints Limit hours of noisy works to 08:30-17:00	Medium	Annoyance or nuisance to the residents especially during warm summer months when residents use their gardens more frequently	Low
Spillages of liquids or contaminated rainwater runoff from site or leaking from tanks or storage vessels	Groundwater	Indirect run-off through the soil layer, or surface run off	Ensure regular integrity testing of storage vessels and land drains. Regular inspections of bunds and tanks.	Low	Chronic contamination of groundwater	Low
Firewater control	Groundwater	Indirect run-off through the soil layer, through cracks in impermeable surface or leaks from the underground tanks or drains	Firewater run off can possibly enter the groundwater via the same routes as rainwater. Rubber mats and bungs to prevent pollution of the surface water system.	Low/medium	Potential contamination of groundwater	Low
Leak from tanks containment	Groundwater	Through surface run off.	Ensure maintenance checks of the bunds and over ground storage tanks are undertaken in accordance with the maintenance programme and checks are recorded.	Low	Chronic contamination of groundwater	Low
Spillage of hydraulic oil, petrol from plant and machinery	Groundwater	Through surface water run off	Ensure maintenance checks of equipment are undertaken in accordance with the maintenance programme and	Low	Chronic contamination of groundwater	Low

			<p>checks are recorded.</p> <p>Ensure appropriate staff are fully trained in the operational and spills procedures</p>			
Arson or vandalism causing the release of pollution material to air, water or land	Adjacent residents	Air transport of smoke or spillages and contaminated firewater by direct runoff from site.	<p>Gates are closed and locked outside of office hours to block access further.</p> <p>Regular checks of the Perimeter.</p>	Medium	<p>Harm to health respiratory irritation</p> <p>Pollution of water via off site surface water drainage or adjacent land</p>	Low
Flooding of site	Sensitive receptors	Flood waters	<p>There are no watercourses nearby and the site is not in a floodplain .</p> <p>All storage vessels have secondary containment</p> <p>Ensure onsite drains are kept clear</p>	Very Low	If waste is washed off the site it may contaminate land drains/ditches.	Very Low

1.4 Legal Register

Legislation	Relevance	Applicable to which processes	Where held?	Person responsible for compliance
Environmental Permitting Regulations 2014	<p>The site requires an environmental permit to operate.</p> <p>Environmental permitting is a risk-based regime for regulating business</p>	Storage, handling and treatment of waste on the site	Copy held in site office	Owner

Legislation	Relevance	Applicable to which processes	Where held?	Person responsible for compliance
	activities that could have an impact on the environment or human health.			
Environmental Protection Act 1990 (Part II & Part III)	Defines the legal framework for duty of care for waste, and statutory nuisance.	The transfer of waste from site and the impact of operations on neighbouring residents.	Copy held in site office	Owner
Provision and Use of Work Equipment Regulations 1998 (PUWER)	Establishes requirements for those owning and controlling equipment used at a work's premises	hydraulic plant/grader	Copy held on site	Owner
Health & Safety at Work Act 1974	Establishes requirements for risk assessment for those working in potentially hazardous conditions	Working close to machinery Operating machinery	Copy held on site	Owner
Waste Framework Directive 2008/98/EC	Lays down controls for the safe disposal and recovery of waste. Article 13 lays down the objective that waste is recovered or disposed of without endangering human health and without using processes or methods that could harm the environment.	All site storage handling and treatment of inert waste on site.	Copy held in site office	Owner
Control of Pollution (Oil Storage) (England) Regulations 2001	Applies where oils including (petrol, diesel, mineral oils) are stored on site in containers larger than 200 litres	Operation of equipment for materials handling on site	Copy held in site office	Owner
The List of Wastes Regulations 2005	Contains a harmonised list of hazardous and non-hazardous wastes	The operator needs to understand the properties of the wastes produced on site to ensure safe and secure storage and handling.	Copy held in site office	Owner
Waste (England & Wales) Regulations 2011	Duty of care requirements and information required on a waste transfer note	Handling, storage and transfer of Waste	Copy held in site office	Owner

1.5 Site Objectives

Essex Utilities Ltd aims to operate in a way that minimises pollution to the local environment and does not pose a threat to any of our immediate neighbours by way of pollution, noise or disturbance. Further quantified objectives will be documented after the first year of operation of this EMS.

1.6 Operational Control

Essex Utilities Ltd has developed a number of operational control procedures by which it undertakes its operations. These are listed here

- Firewater management (EP1)
- Noise management (EP2)
- Spills and incidents (EP3)
- Waste Management (EP4)
- Checks and Inspections (EP5)
- Mud & Dust (EP6)
- Complaints and Neighbourly Relations (EP7)
- Vehicles & Plant (EP8)

1.7 Incidents and Accidents

The following table references other procedures and responsibilities in the event of an emergency situation

No	Activity	Responsibility	Documentation
1	<p>The following plan and associated supporting documents should be adhered to in the event of any of the following environmental accidents or incidents:</p> <ul style="list-style-type: none"> • Failure of storage tanks; • Leak from bowsers or oil storage tanks containment failure of bunds and impermeable surface; • Spillages of hydraulic oil, petrol and diesel during sorting and grading 	Owner and all members of staff	<ul style="list-style-type: none"> • Spillage Response procedure; • Fire Response Procedure; • Accident and Incident Management Plan; • Site Plan; • Key Site and Emergency

	<ul style="list-style-type: none"> • Accidental fire causing release of smoke and fumes; • Arson or vandalism causing the release of pollution material to air, water or land; and • Flooding of site. 		<p>Contacts;</p> <ul style="list-style-type: none"> • List of PPE; and • Accident, Incident & spill Record.
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1.8 Incidents and Complaints

No	Activity	Responsibility	Documentation
1	In the event of a complaint made to the site, the complaint record must be completed, and record kept	Owner	Complaint Record

EP1 Dealing with Firewater

Scope: Fire at the site may result in excessive firewater entering the surface water system. Whilst the first actions are to protect life and property in the event of a fire Essex Utilities Ltd also recognizes that prevention of pollution to the environment is important. This procedure details the preventative measures employed to minimize the impact of such an event.

Responsibility: Site owner

Background: The site at Westerham Rd is mainly enclosed within a remote site, however some firewater may enter the surface water system in the access yard.

- In the event of a fire the separate fire evacuation procedure is to be followed.
- Preventative checks are conducted at regular intervals to ensure that interceptors and tanks are dipped and tankered away if required on a regular basis.
- Where possible there is separation of incompatible materials and of combustible materials and ignition sources on site
- Where possible there is incorporation of fire breaks into site layout and containment of fire water.
- The site has a no smoking policy.
- The site is maintained as tidy as possible and there are no stockpiles of combustible materials.
- Fire training and emergency drills are conducted at regular intervals

Essex Utilities Ltd keeps a site plan which identifies;

- Site entrances and exits - kept clear for access to the emergency services

EP6 Mud & Dust

Scope: To detail how mud and dust during normal and abnormal operations are dealt with to minimize impact on the environment

Responsibility: Site owner

Background: Mud on roads and dust emissions can cause annoyance to neighbours and can have an impact on surface water.

The site carries quantities of water in bowsers which are used to damp down the work area in very dry conditions. Daily checks are made of dust levels and recorded in the site logbook and note is taken of any impacts to nearby neighbours and receptors

Mud on roads external to the site is not tolerated and a vehicle washing system is employed on-site to ensure that vehicles coming onto and exiting the site are free of mud. Regular inspections of vehicles and the main roads are made to ensure that no annoyance to other road users and neighbours is apparent.

- During normal operations, all staff have been made aware of the requirement to minimise dust and mud distribution
- All staff have had appropriate training on how to minimise dust and mud distribution on site
- In the event of a larger incident or dust blow the Environment Agency is notified as per permit reporting requirements and an incident log completed.

Dust/Mud incident type/amount?	Action Taken?	When?	Preventative measures?	Comments

EP3 Dealing with Spills

Scope: To detail how spills during normal and abnormal operations are dealt with to minimize impact on the environment

Responsibility: Site owner

Background: Spillage of oils and chemicals can have an impact on the soil and groundwater beneath the site.

The site carries quantities of absorbent granules and absorbent booms to mop up small quantities of hydraulic oils and other liquids if spilt. If used these are stored in the hazardous waste container until removed from the site by specialist contractor within a reasonable period of time.

- During normal operations, all staff have been made aware of the requirement to minimise fuel and liquid spills on site
- All staff have had appropriate training on how to deal with a fuel spill in the event of an incident occurring
- Absorbent is used to clean up the spill at source. If it is a larger spill and it is safe to do so then the source of the spill is curtailed if possible.
- The location of spill kits and absorbent material is identified on the site plan
- In the event of a larger spill the Environment Agency is notified as per permit reporting requirements and an incident log completed.

Spill type/volume?	Action Taken?	When?	Preventative measures?	Comments

EP4 Waste Acceptance & Handling

Scope: Only inert building and excavation waste is accepted at the site.

Responsibility: Site manager

Background: Hazardous waste or waste codes not on the environmental permit will not be accepted at the site.

All wastes are tested to ensure that they contain no hazardous waste materials such as oils or asbestos. This must be adhered to and the incoming waste checked on a regular basis for integrity. Independent soil tests are produced for each accepted waste coming to the site. Records of these are kept for a minimum of 3 years.

Any waste not adhering to this procedure or accepted waste codes is rejected at the gate. Waste Accepted at the site are as per those indicated on the environmental permit

Waste Acceptance

Only the proposed waste types are accepted at the site. Each load incoming is inspected to ensure that non-conforming material is rejected. Soil reports will be inspected and reviewed as necessary. All staff will be trained in waste acceptance and the materials allowed to come onto site. Non-conforming loads are rejected and not allowed to enter the premises.

Waste Storage

All waste types accepted to the site are stored within the proposed permitted area in discrete piles. These are sorted according to particle size with soils being the smallest types. All waste is stored in such a manner as to minimize dust blows and away from the main incoming track to minimize mud on wheels.

Waste Treatment

Wastes are treated by grading, crushing and sorting by size. Incoming waste is graded and the resultant piles are stored as per above. The bucket crusher operates by reducing larger inert types into smaller inert types by size reduction. There is a mobile water bowser that can be used to damp down if required around the permitted area.

Quarantine Area

Should non-conforming waste types inadvertently be discovered, then these are moved to a quarantine area which is reserved specifically for this purpose. This area is labeled as such and all staff are aware of its location and purpose. This is noted on the updated site plan. Wastes are noted and the donor is notified, who will then arrange for the non-conforming waste to be removed.

Hazardous Waste

Other hazardous waste such as asbestos, fire extinguishers, gas bottles, sludges, powders, fridges are not accepted at the site. Wastes which are presented and rejected are noted in the site log book.