

Mr Paul Burke

*Tentelow Lane Football Field, Osterley Sports Club, Southall, Middlesex,
UB2 4LW*

SUMMARY OF ENVIRONMENTAL MANAGEMENT SYSTEM

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INTRODUCTION

This Environmental Management System (EMS) summary relates to the project at Tentelow Lane Football Field, Osterley Sports Club, Southall, Middlesex, UB2 4LW, carrying out improvement works including constructing earth bunds for amenity benefit – using excavated materials in a recovery operation for land improvement.

The EMS sets out how the operational construction site will be managed on a daily basis, to minimise any risks from the operation to the surrounding physical and human environment. The management system sets out Mr Burke's commitment to environmental protection and prevention of pollution, and continual assessment of the operations and where necessary, improvement and corrective actions.

Further information regarding the materials selected for construction of the earth bunds, and assessment, and elimination of the environmental risks can be found in the accompanying documentation, forming the EMS;

ADDITIONAL DOCUMENTS:

Additional documents utilised by the site include;

OPRA Profile Tentelow Lane

73260 Environmental Risk Assessment

73260 Waste Recovery Plan

73260 Conceptual Site Model: Environmental Setting and Site Design (ESSD) Report

73260 Site Condition Report

Site Plans – 1. Plan 1 Permitted Area Boundary 2. Proposed Bunds 3. Plan 3 Ground Levels

Operator competence – Paul Burke EPOC certificate and NPORS Operator certificates (Steve and Paul Burke)

OVERVIEW OF OPERATION

Daily operating procedures apply as follows:

Daily start up – the site will be opened by Mr Burke. The site, and facilities needed for the day (e.g. wheel wash) will be checked and made available. Deliveries will have been scheduled to be staggered at appropriate intervals. Access to tipping areas will be checked and made available. Pre-use checks of onsite plant will be conducted by Mr Paul or Mr Steve Burke.

Daily operation – A site office (ticket office) has been installed as a temporary office for the site and for all drivers, visitors and contractors to report to. A site diary is maintained, in which the weather conditions, the phase of work and delivery areas, plant and equipment needed, pre use checks and any corrective actions required will be logged.

Deliveries to site will be scheduled for the phase of work needed, and material tipped as close as possible to where it will be required to be used. The tipper and excavator will be used to then use the material to create the bunds.

All delivery drivers will report to Mr Burke at the site office where the load and paperwork will be verified. Each delivery is directed and supervised by Mr Burke.

The site conditions (e.g. weather and type of activity planned for the day) will be assessed and confirmed, in accordance with the overall plan, and the day before commencement, and in the morning on site start up. Nuisance or disturbance from deliveries and from use of plant to construct the bunds will be minimised in accordance with these considerations;

NOISE AND VIBRATION

A tipper and an excavator will be operating around the site. The earth materials handled in themselves will not create any banging, scraping etc. There is a single gate for entry/ exit to the site. Lorries will be provided with a turning circle, or use the car park to turn, and reverse alarms will be kept to a minimum. Lorries will arrive at regular intervals and will not, for example, be stacked up outside the site with engines running. Tentelow Lane is ordinarily busy but not congested. It is not anticipated that the delivery vehicles will add significantly to the ambient noise levels of the road. Ealing Council will assess and approve the number of vehicle movements in accordance with the planning permission.

The normal operating hours of the site will be 8am to 4pm. As agreed with the Council lorry movements and activity are restricted to 7.30am to 5pm.

MUD AND DEBRIS

No vehicles will be allowed to leave site tracking excessive mud. The site will not be in operation on very wet days. A temporary roadway is provided throughout. A wheel wash will be established (Rhino), and a jet washer will be available to clean wheels on arrival/ departure.

DUST MINIMISATION

The materials delivered to site for the construction of the bunds will be fit for purpose and not dry or dusty.

The likelihood of dust being raised from the activity associated with vehicle movements is minimised by use of the temporary roadway, provided for all delivery vehicles, and kept damp and free of mud and debris using a wheel wash. The speed limit will be 5mph. A roadsweeper vehicle will also be available if required.

Daily close down – will include switching off and cooling of all plant and equipment. Ensuring any delivered materials not yet used are secure, and piled in a stable fashion, not causing obstruction and not exposed to any ponding or leaking water supplies which could cause run-off. The site will be secured and locked down. The diesel is secure and plant is immobilised to deter unlawful entry of theft.

Waste storage (prior to use) – in accordance with the permitted activity and good practice, material stored on site pending use;

- Has been verified as inert/ non-hazardous material as specified and not containing any unwanted items, prior to acceptance.
- Will be stored within the permitted area and as close as possible to where it will be used.
- Will be stored for no longer than 1 year pending use.

- Will be stored such that the pile is not more than 2m high.

Segregation – waste soils accepted for use in construction of the bunds will be a relatively homogenous waste stream, so loads delivered may be used and stored together. These will be kept distinct and not stored with any non-waste or specific topsoils for use in the capping or surfacing for completion of the project. Any materials brought to site and used or stored under the U1 or S2 exemptions for distinct of different purposes (e.g. material for the temporary roadway) will be kept separately.

FIRE PREVENTION

The requirement for a Fire Prevention Plan has been dis-applied to deposit for recovery permits. Fire risk from the activity is considered low, nonetheless principles of fire management are to be applied to the operation including;

- Homogenous waste stream, checked on arrival – inert materials stored prior to use
- Quarantine and rejection procedure in place
- Operating areas kept clear of debris or any combustible materials
- Mobile plant and machines are well maintained, checked for leaks or build up of grease on hot exhausts every day, and parked up away from any potential ignition risks.
- Mobile plant carry fire extinguishers
- There is no electricity supply on the remainder of the site (excluding clubhouse areas).

CONTINGENCY PLANS AND ACCIDENT MANAGEMENT

Environmental impact from the following causes is minimised:

The below aspects which have been assessed in the Environmental Risk Assessment are deemed low residual risk after management.

Cause	Likelihood	Consequence	Measures taken to avoid	Response/ recording/ investigation
Plant/ machinery breakdown	Low	Leak or spill of potentially pollution fuel or fluids. Short delay to planned bund construction work for the day.	Plant are in good condition and maintained, and checked for loose parts or leaks daily. Materials are inert and can be stored on site prior to use (R13).	Any fault with the plant, the machines would be repaired or replaced. Sufficient funds are available to the project to rectify plant or equipment failure.
Including diesel tank spill	Low	Spillage of diesel to ground	The diesel drums are double skinned. The nozzle has shut off (as forecourt).	Any diesel spill would have absorbent materials applied immediately and any affected ground would be removed for disposal and replaced with clean soil.

Wheel wash spill	Low	Limited – uncontaminated water	The wheel wash is in good working order, and checked daily for signs of faults or wear. Clean potable water only is used.	The kit would be repaired or replaced. Water would be allowed to seep to ground, no contamination risk.
Enforced shut down	Low	Reasons for a period of temporary cease of the activity would potentially be if a complaint were being investigated, or a planning condition were being assessed, or a significant compliance issue were being addressed.	The site is operated within the specifications of the planning consent, environmental permit, and with regard to minimising pollution and nuisance to environmental and human receptors, as set out in the EMS and associated documents.	Complaints are most likely to be directed to Ealing Council in the first instance, who will notify Mr Burke and/ or visit the site. Remedial action will be agreed with the Council and/ or EA where appropriate.
Fire	Low	Low risk. Fire surrounding the mobile plant or fuel possible.	As above, inert wastes for use in recovery very low combustion potential. Plant and fuel tank are well maintained. Site is kept free of dust/ debris or other potential ignition sources.	Mobile plant carry fire extinguishers. The fire service would be called to ensure a fire were properly extinguished and verify the safety of the site. The Council would be notified. The cause would be recorded and rectified to prevent reoccurrence.
Vandalism	Medium	During the operational construction phase, the mobile plant and diesel on site may be of interest to vandals or thieves.	The site is fenced and secure, with a single gated entrance/ exit which is locked out of hours. CCTV cameras cover the entrance, site office and clubhouse. The mobile plant are immobilised and the diesel is stored out of view of the site perimeter.	NB the installation and design of the bunds is in part intended to provide the site with additional security, inaccessibility and privacy from the outside on some areas of the boundary. Any breach, vandalism or theft would be reported to the police and Council. Contingency funding and insurance are available where appropriate. Any contamination or damage caused by e.g. diesel spill would be remediated.
Extreme weather	Dry weather – medium/ high	Periods of prolonged dry weather increase the likelihood of dust being raised from vehicle movements and moving and spreading material.	Material received on site for deposit in recovery will have been sourced from excavation of primarily inert muck and subsoils which will not have been exposed to drying effects and will not be excessively dusty. A temporary roadway is installed for vehicle movements and swept with a roadsweeper. A speed limit of 5mph is in place.	NB weather conditions are checked in advance and on a daily basis. Lorries scheduled to deliver to site can be cancelled or diverted (PSBH Ltd). Material can be accepted and stored on site prior to use in the construction of the bunds. All storage will occur within the permitted area boundary and at a maximum of 2m high piles.

	Wet weather – medium/ high	Storms and wet weather have the potentially to create mud and pooling on the site.	The site will not be operated during heavy rainfall or storms. No vehicles will be allowed to track mud from the site and roadway and a wheel wash are employed. The mobile plant will not be operated in very wet conditions for safety reasons but will be used to instate materials and ensure the site is in order after a wet weather event.	A tanker or water bowser could be employed to dampen down a pile in prolonged dry periods where instating the material in bund construction were delayed temporarily. Piles of inert materials would be expected to retain their integrity in wet weather, but the site would be checked regularly and piles could be covered or kept in place with temporary edging if the bund construction were postponed due to extended extreme wet weather.
	Flooding – low	Flooding on the site could compromise storage of materials and construction of the bunds.	The site is not in a zone at risk from pluvial flooding.	

Accidents or incidents will be recorded in the site diary – and the impact and remedial action recorded in the Site Condition Record if appropriate.

It is not considered necessary to make the emergency services aware of the site activities at the present time.

SITE RECORDS

A site diary will be used on a daily basis, to record the site activities, including weather conditions, the phase of work and delivery areas planned, plant and equipment needed, pre use checks and any actions required.

The following records will be kept in an EMS folder in the site office for reference (and a duplicate copy retained off site by Mr Burke, for use as a contingency measure in the event of a site incident).

Copies of key documentation;

Copy of the environmental permit

Copy of the planning consent (173108VAR)

Copy of the U1 and S2 exemptions, and renewal dates.

Documentation of operator competency and staff training – EPOC and NPORS certificates.

Copy of every conveyance note (waste transfer note) – completed correctly, details of waste delivered to site including);

- quantity (weight or volume)
- List of Waste (LoW) Code
- origin (for example, the location the waste sent from)

- the identity of the producer of the waste (for example the company name)
- the date the waste arrives at site
- any quarantined materials that are part of the delivery, and what action was taken to deal with them

Availability of soil analysis reports conducted by the producing site, assessed by Mr Burke and informing decisions on material sourced. Accompanying chemical analysis data of the material for submission to Ealing Council.

Environmental Risk Assessment

Conceptual Site Model: Environmental Site Setting and Site Design (ESSD) Report – particularly section Pollution Control Measures

Waste Recovery Plan

Additional Duty of Care records – details of vehicles and vehicles drivers, and waste carrier licences of all haulage firms/ individuals must be checked and recorded.

Hazardous waste – absolutely no hazardous waste will be accepted in site.

A double skinned tank for diesel for the machines is kept on site – the feed nozzle has an auto shut off valve like a petrol forecourt pump.

Rejection procedure – any unsuitable material will be rejected, and reloaded and returned immediately. If the driver leaves the site the Environment Agency will be contacted immediately to assist with enforcing the removal of the waste back to the producer, or having it analysed, disposed, and charged back to the producer or carrier.

Any large items of e.g. stone or hardcore not wanted for the bunds will be removed manually and stored for use elsewhere (e.g. stored under S2 exemption and used by PSBH Ltd).

Complaints procedures – complaints regarding the site are most likely to be directed to Ealing Council.

Ealing Council will notify Mr Burke by email and most likely visit the site.

Mr Burke and the Council officer will investigate the nature of the complaint and whether there are just grounds for it.

Remedial action will be agreed with the Council and implemented without delay.

Managing staff and training records – Mr Paul and Mr Steve Burke are the permanent site staff. Paul Burke is the site supervisor and technically competent manager (EPOC CIWM April 2018). Both will operate the tipper and 360° excavator to construct the bunds.

Lorry drivers will sign in to the site and tip where instructed. Each delivery is supervised by Mr Burke. Lorry drivers and associated carrier firms will have licences (e.g. waste carrier licences, as above) checked in advance.

The site rules, and responsibilities will be explained to any other contractors, who will always report to and sign into the site at the site office e.g. road sweeper operative.

Certification will be renewed and updated as appropriate (e.g. National Plant Operators Registration Scheme (NPORS) – demonstrating Paul and Steve are trained and competent to operate (360° Excavator, Forward Tipping Dumper (and Telescopic Handler (n/a)).

Site Condition Report – a Site Condition Report has been completed in accordance with the requirements on application for the environmental permit, to record the condition of land and sensitivity of groundwater at the site. Details of any historic spills or contamination have been assessed (none of significance identified).

The Site Condition Report (sections 4 to 7) must be completed throughout the life of the permit recording any changes to the activity, or significant incidents and measures taken to protect land.

On surrender of the permit sections 8-10 must be completed describing the decommissioning, removal of pollution risk and a statement of site condition.

The Site Condition Report must show that the site has been returned to a satisfactory state, and evidence that the condition of land or groundwater has not deteriorated over the life of the permit.

REVIEW OF THE MANAGEMENT SYSTEM:

The management system must be reviewed and/ or updated following any change to site, operation, or equipment that affect activities, or at least for each season or phase of work.

A review of environmental performance will be conducted at least once annually, or following any complaints, incidents, or improvements to operating procedures.

USE OF THE MANAGEMENT SYSTEM:

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

The management system is available to show the Environment Agency or Ealing Council if asked.

Any document forming the management system can be made available, if requested by any interested parties such as neighbours and the local community to explain how the activities are managed and how the site complies with the environmental permit.