

## **Summary of Written Management System**

Environmental Permit Application:

March 2023

This document provides a summary of the written environmental management system that Liley Clough Environmental Limited intend to implement on grant of an environmental permit for the deposit of waste for recovery. It follows the Environment Agency guidance 'Develop a Management System: Environmental Permits' and provides a summary on how each topic will be addressed within the site's Management System.

As required by the Environment Agency Guidance, the written management system will cover the following:

### **Location/Context:**

The site is situated at Emley Fields, Liley Lane, Grange Moor, Huddersfield, WF4 4EN. Grid reference for the centre of the site is SE 21206 17030. It is located on an area of derelict land, formerly the site of Whitley Clough Colliery, which closed in 1947.

The purpose of the operation is to restore the land, as left by the former colliery, and regrade the steep slopes to allow for contours within keeping with the surrounding area and for the ability to farm the land using modern agricultural machinery. This will involve the importation and spreading of approximately 90,000 tonnes of subsoil and topsoil.

### **Site Infrastructure Plan:**

Plans of the site location, receptor maps to be will be inserted.

### **Site Operations:**

Liley Clough Environmental Ltd will spread subsoil and topsoil to infill the current hollow to achieve a more level gradient with a quality of soil that can be used for agriculture. Subsoil and topsoil will be sourced from a small number of sites and will be brought onto the site by prior arrangements only.

Loads will be spread on the day of delivery to minimise any storage of soil using a suitable tracked vehicle. Other site operations will include wheel washing to prevent mud on the road and some releveling of topsoil already present on site.

Steps will be listed to prevent or minimise risks to the environment in the full management system .

### **Waste Acceptance Procedures:**

All waste will be sourced from a small number of pre-approved sources (approximately ) and will be uncontaminated subsoil and topsoil from construction projects on greenfield sites. Only uncontaminated soils will be accepted.

Approved sources will be listed in the management system once known.

Each load will be checked to confirm the source is a pre accepted source and will be visually inspected to ensure it conforms to the waste description on the relevant duty of care written information paperwork. Any loads found to be contrary to the waste description will be rejected. The visual check

will be used to check for any concerns over potential contamination, such as unusual colour, odour, appearance and any other materials present.

Once tipped any non-conforming materials found will be removed to a quarantine area prior to spreading of the soil. Any materials removed will be recorded and removed off site in accordance with the Duty of Care requirements. Records of actions will be kept. Repeated non-conformances will be followed up with the waste producer.

Appropriate records of all waste imported to the site will be kept in line with the requirements of Duty of Care and any permit conditions. A procedure will be written and added to the management system to outline how this will be done.

#### **Site and Equipment Maintenance Plan:**

Details of the a maintenance plan for the onsite bulldozer used for the spreading of soil will be detailed, along with the procedure for daily checks before use for managing any faults or breakdown.

#### **Contingency Plans:**

Details of contingency plans will be provided for the following occurrences:

- Breakdown of bulldozer – stopping receiving waste
- Extreme weather conditions

#### **Accident prevention and management plan:**

Potential incidents/ accidents/ near misses etc will be identified based on a risk assessment and measures to prevent them occurring will be identified and put in place. Such measures will be recorded.

Any incidents, accidents resulting in pollution of the environment will be notified to the Environment Agency in accordance with the permit requirements. Procedures will be in place to deal with any spillages from the onsite machinery.

Any incidents, accidents including events with the potential to cause environmental harm and any non-conforming wastes shall be investigated and measured to identify and mitigate any effects and actions needed to prevent reoccurrence identified in accordance with procedures to be added to the written management system.

All occurrences and actions will be recorded in line with a written procedure.

The occurrence of any incident/ accidents etc will result in a review of the accident prevention and management plan. In any event the plan will be reviewed on a yearly basis.

#### **Emission management**

There will be no emissions from the site that will be approved with limits within the permit.

Other emissions will be prevented where possible and mitigated against in line with the relevant emissions management plans which will be completed if required. The type of waste to be accepted should not give rise to odour issues. Noise will be minimised due to the number of vehicle movements (including the onsite bulldozer) compared to the normal activity of the area.

Plans will be drawn up to prevent and manage escape of dust, mud and suspended solids run off.

**Contact Information for the public:**

Permit displayed at entrance of site.

**A changing climate:** It is not considered that climate change will specifically effect the operations of the site other than extreme weather conditions may result in more frequent issues relating to mud restricting use of the site/ ability to spread waste and prolonged dry weather will require dust suppression measures to be implemented more frequently as requires. Both situations will be dealt with in accordance with written contingency plans and emissions management plans.

**Complaints procedure:**

Any complaints will be managed by the site operator, investigated and actions identified to ensure compliance with permit, planning and to ensure no nuisance is caused. All complaints, follow up and actions will be recorded.

Includes complaints logs and records, investigating the complaints and the complaints handling process. All complaints will be recorded and immediately dealt with.

**Managing staff competence and training records:**

The management system will explain who is responsible for what procedures and who is technically competent. It will detail the qualifications gained within accordance with the CIWM/WAMITAB Operator Competence Scheme. Requirements and records of training needs in order to safely, legally operate the onsite bulldozer, comply with permit, Duty of Care and procedures within the written management system will be maintained for all staff.

The Technically Competent Manager will be onsite the required amount of time based on the time the site is operational. Attendance will be recorded.

**Keeping records:**

Details of procedures and requirement for all records and how they will be kept will be completed as part of the written management system. This will include:

- Keeping records of waste transfer notes and recording each delivery of waste to the site.
- Keeping site condition report up to date to record the condition of the land during the life of the permit and on surrender.
- Keeping records as required by the permit conditions.

**Review your management system:**

The management system procedures will be reviewed following incidents/ accidents etc and other non-compliance with permit conditions. Where necessary training will also be reviewed to ensure continued compliance with the written management system.

In any event the management system will be review annually.

All amendments will be documented.