



# PROCEDURE



**Document No.:** PR-EMS-York

**Revision No.:** 4

**Document Status:** December 2021

**Owner:** Environmental Technical Manager

**Document Category:** York site system only

**Title:** Environment Management Procedure for York Site

Note this local EMS Procedure will remain in place until remediation activities start under any revised Environmental Permit at which stage the Arcadis EMS below will come into effect superseding this Procedure.

“ENVIRONMENTAL MANAGEMENT SYSTEM Waste Recovery Permit - Deposit for Recovery Reclamation of the former British Sugar Refinery Site, York”

Reference 10024487-AUK-XX-XX-RP-GE-0068-P1-Environmental Management System

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## 1.0 FORMS

Several forms are taken from the British Sugar corporate EMS for use in the York Site EMS, these are:-

Environment Risk Assessment : PR-EMS-002/002.

Contact Summary Report [electronic] [PR-EMS-003/003].

Environmental Complaints Reporting Form.

## **2.0 COMMUNICATION & SENIOR MANAGEMENT REPORTING**

2.1 The Environmental Technical Manager will report to the Director of Agriculture on environment issues on a regular basis.

### **2.2 Site Communications - to Corporate**

2.2.1 Significant environmental issues arising on site shall be communicated to the Environmental Technical Manager along with any additional information requested. This includes any which need to be reported to external bodies, or are judged to be either serious or potentially sensitive to the company.

2.2.2 A copy of every significant written communication to or from the Environment Agency, an Environmental Health Officer, or other Regulatory Bodies if relevant, shall be sent to the Environmental Technical Manager as soon as practicable. This shall include all copies of Environment Agency Compliance Assessment Reports

2.2.3 Significant issues raised with the Environmental Regulatory Authorities shall be reported on the Contact Summary Report and sent to the Environmental Technical Manager as soon as practicable.

### **2.3 Site Communications - External**

2.3.1 All official reports specified in the Environmental shall be submitted providing the required information.

2.3.2 All breaches of Permits must be reported to the regulator in accordance with the legal requirement. This should normally be done verbally as soon as is practical to the Environment Agency Site Inspector or their deputy and be followed by a written notification. If the Site Inspector or deputy is unavailable for telephone contact then reporting may be done by e-mail.

Where the incident involves a significant pollution incident the EA Incident Hotline should be notified.

Evidence shall be available on site of any associated corrective and preventive action and any Improvement Plan.

2.3.3 Copies of written communications regarding sensitive public issues shall be sent to the Environmental Technical Manager as soon as practicable.

*[Note: It is expected that dealing with media enquiries will involve the Communications Department at Central Office.]*

## **3.0 LEGISLATION & REGULATORY REQUIREMENTS**

A list of applicable legal and other relevant requirements is maintained using the company preferred online legal database.

In the main, application at site is through environmental permits and licenses. Sites should operate to the requirements of these permits and licenses to demonstrate legal compliance.

A local list shall be established and maintained to include:

- Environmental Permits
- Details from Planning Authorisations that are environmental requirements

## 4.0 **RISK ASSESSMENT**

### 4.1 **Risk Assessment**

4.1.1 An Environment Risk Assessment shall be undertaken for all significant aspects that are appropriate to York Site.

4.1.2 Ratings shall be given using the table below:

	Likelihood of Occurrence		Likelihood of Detection		Severity of Consequence
Criteria	Rank	Criteria	Rank	Criteria	Rank
Very High	5	Very Low	5	Very High	10
High	4	Low	4	High	8
Moderate	3	Moderate	3	Moderate	6
Low	2	High	2	Low	4
Very Low	1	Very High	1	Minor	2

All the ratings should be added together to give a total risk assessment:

Low	4 – 8
Medium	9 - 12
High	13+

4.1.3 The assessments shall be documented.

4.1.4 For some activities the Risk Assessments may be carried out by an approved External Body [e.g. Bank stability] - in this case the format will be as deemed appropriate.

4.2 All Risk Assessments shall be reviewed as a minimum every 3 years or sooner if there has been a significant change.

## 5.0 **TARGETS AND PROGRAMME**

5.1 Site Targets and Programmes shall be established considering:

- Permit Improvement Programme items
- High Risk aspects
- Corporate Policy
- Complaints, incidents, audit results and internal non compliances
- Any other relevant changes, including outcomes of site reviews

5.2 The Programme shall define:

- the measures for the Targets
- actions
- responsible persons
- timescales

- 5.3 The Programme shall be reviewed and revised for improvement, as appropriate, on a regular basis; this shall be at least annually.

## **6.0 MEASURING AND MONITORING**

- 6.1 A schedule shall be established and maintained for the monitoring and measuring of all aspects which could cause a significant impact.
- This is the monitoring tables from the site Environmental Permit and as given in the Working plan.
- 6.2 All external calibration services and other monitoring and measuring services shall be declared on the local critical goods and services list.

## **7.0 ENVIRONMENTAL EMERGENCY & PREPAREDNESS**

- 7.1 The Corporate Incident Management Team [CIMT] shall be drawn together depending on the type of incident.
- 7.2 The Company Environment Manager shall usually be the first point of contact for the CIMT.
- 7.3 A system shall be in place to cover, as a minimum, high likelihood/high consequence events.

The Plans shall include actions and management of the actions being taken to deal with the Incident, where they themselves may have potential

## **8.0 CONTRACTORS AND VISITORS ON SITE**

- 8.1 Visitors shall be escorted at all times while on site by their site contact, which may be a contractor.
- 8.2 Before commencing work, all contractors shall be given a site induction.

This shall include consideration of:

- Company environmental policy
- Emissions to atmosphere
- Groundwater or water-course contamination
- Waste management
- Spillage
- Neighbours

## **9.0 INTERNAL AUDITING**

### **9.1 Audit Process**

9.1.1 An internal audit shall be undertaken at least once a year.

9.1.2 The scope shall cover:

1. Status of site legislative requirement register
2. The past 12 months Non Conformities and notifications to verify close out.

3. Compliance with applicable legal requirements.
  4. Environmental Monitoring, including annual Golder's report.
  5. This procedure.
- 9.1.3 The Company Environmental Manager is responsible for arranging these audits and informing Site personnel and Auditors of the arrangements.
- 9.1.4 Audits reports and any associated non-conformities are to be saved on the Environment SharePoint site. It is the responsibility of the Company Environment Manager to ensure this database is kept current and actions are closed as appropriate.

## 10.0 SITE REVIEW

Management review is usually undertaken three times a year. At least once a year, the following shall be reviewed by site top management:

- Follow up from previous management reviews
- Significant regulatory issues, including permit conditions
- Incidents, including near misses and non-compliances, and their follow-up actions, risk assessment review and any trends
- Significant changes to risk ratings
- The operation of the Environmental Management System
- The environmental performance of the site
- Progress towards achieving the site's environmental improvement targets and objectives
- Results of audit, including status of corrective and preventative actions
- Performance of local suppliers of environmentally critical Goods and Services
- Management programmes
- Any other appropriate matters

## 11.0 COMPLAINTS

### 11.1 Initial Receipt of the Complaint

- 11.1.1 Part A of the Reporting Form shall be filled in by the initial recipient of the Complaint.

Level of detail required at time of complaint to include:

- Time and date of contact
- Time and date of complaint [not always same as above]
- As much information about the complainant, including wind direction
- Relevant processing conditions

*Note: This may be Security, Reception, etc.*

*It is important to remember that we must be speedy and sensitive in our response to the complainant. Be **helpful and courteous** at all times.*

- 11.1.2 The Form shall be passed to the Site Management contact as soon as possible.

11.1.3 If the Complaint is of sufficient risk as an incident or potential incident, the information shall be telephoned to a member of FIMT immediately.

11.2 Complaint Investigation

11.2.1 The root cause of the Complaint shall be investigated.

11.2.2 Corrective and Preventive Action shall be implemented in a timely way.

11.2.3 Follow-up monitoring shall also be established, where appropriate.

11.2.4 Part B of the Form shall be completed.

11.3 Complaint Response

11.3.1 An appropriate and timely response shall be given to the complainant, informing them of the action taken. Any complaints from members of the public shall be acknowledged within 2 working days, wherever possible, and the aim shall be to communicate the findings of the complaint investigation to any complainant within 5 working days of the complaint.

11.3.2 Part C of the Form shall be completed.

11.3.3 A copy of the completed Complaint Form shall be forwarded to the Company Environment Manager.

**12.0 RETENTION OF RECORDS & PROCEDURES**

12.1 EMS documentation on site will be hardcopy only but a copy of this procedure and all Local EMS records will be held on eFacility.

12.2 Documentation will be held on eFacility for a minimum of six years.

## **Environmental Management System – Record – British Sugar York**

Revision number 6, December 2021

Note this local EMS will remain in place until remediation activities start under any revised Environmental Permit at which stage the Arcadis EMS below will come into effect superseding this EMS

“ENVIRONMENTAL MANAGEMENT SYSTEM Waste Recovery Permit - Deposit for Recovery Reclamation of the former British Sugar Refinery Site, York”

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### **A RESPONSIBILITIES**

Area	Responsible Person
Overall responsibility for closed sites	Peter Watson
Day to day site management, including <ul style="list-style-type: none"><li>- Weekly bank monitoring</li><li>- Control of Contractors &amp; Site Security</li><li>- Site communication to corporate</li></ul>	Kevin Rusling
Environmental management of closed sites	Paul Hardy
Technical competence for operation of landfill	Graham Wright/Nicole Feakes

Other Third Parties	Company - Individual
Ongoing monitoring & Bank stability	Golder Associates
Remediation phase	Remediation contractor, to be arranged.



## B ENVIRONMENTAL POLICY

British Sugar York complies with the corporate Environmental Policy which is maintained within the main Environmental Management System and kept updated on the British Sugar Website.

This policy is communicated to all employees and is signed off by the Managing Director.

## C SITE TARGETS

Site Environmental Targets

Are based on maintaining site integrity and moving towards redevelopment of the site.

Site Environmental Target	Action by	Date	Status
Vary landfill permit to allow remediation on site. <i>Permit issued on 14/10/15.</i>	PH/EA	ASAP	Done

## D IMPROVEMENT PROGRAMMES

No	Item	Action by	Date	Status
1	Vary landfill permit to allow remediation on site.	PH/EA	ASAP	Done
2	Update Newground Legislation Update Service to reflect which laws apply to the York site, when facility is rolled out. – Now use Newground system to make a separate legal register for York Site	?	TBA	
		JW TEC	Dec 15	Ongoing
3	Permit EPR/QP3593NF, Table 1.3, Reference 1. Once the replacement boreholes have been installed the Operator shall submit to the Environment Agency updated plans showing the surveyed locations and reference numbers of all: - Internal gas monitoring boreholes - External gas monitoring boreholes - Up hydraulic gradient groundwater monitoring locations - Groundwater monitoring locations beneath the development platform - Down hydraulic gradient groundwater monitoring locations	PH	Within six months of borehole installation	

## **E      ENVIRONMENTAL MANAGEMENT & EMERGENCIES**

### Environmental Management

See York Site EMS Procedure for details. Records need to be made to cover environmental legislative compliance, environmental complaints, communications, EA returns and any environmental emergencies that occur.

### Environmental Emergencies

Currently there are very few materials on site and so it is unlikely that a major emergency would occur due to site activities. This should be kept under review in case of changing site activities.

Events such as oil leak from vehicles on site or other minor spills would be dealt with as they arise but are low consequence.

Bank stability is only foreseeable high consequence physical event and this is managed by monitoring weekly on site and annually by a specialist to ensure it remains low probability.

All other emergencies are managed through the Environmental Permit and Working Plan.

**F** **RISK ASSESSMENT SUMMARY** – Risk assessments are reviewed every three years or if there is significant change of circumstances.

All risk assessments reviewed 29/11/21 No changes in risk identified. All documents remain at revision status as 29/10/2018

Environmental Risk Assessment by Aspect

Aspect No	Description	Likelihood of Occurrence		Likelihood of Detection		Severity of Consequence		Risk Rating	Date	Review date	
		Criteria	Rank	Criteria	Rank	Criteria	Rank				
1	Town mains	Low	2	Very High	1	Moderate	2	5	Low	01/09/15	29/10/18 r1
2	Borehole	Low	2	High	2	Moderate	6	10	Medium	01/09/15	29/10/18 r1
3	Foul Sewer	Very Low	1	High	2	Minor	2	5	Low	01/09/15	29/10/18 r1
4	Septic tank, weighbridge	Very Low	1	Moderate	3	Minor	2	6	Low	01/09/15	29/10/18 r1
5	Trade Effluent	Very Low	1	High	2	Minor	2	5	Low	01/09/15	29/10/18 r1
6	Other drains	Very Low	1	High	2	Minor	2	5	Low	01/09/15	29/10/18 r1
7	Soil ponds	Low	2	High	2	Moderate	6	10	Medium	01/09/15	29/10/18 r1
8	Limex 70 pond	Low	2	High	2	Moderate	6	10	Medium	01/09/15	29/10/18 r1
9	H Pond	low	2	High	2	Moderate	6	10	Medium	01/09/15	29/10/18 r1
10	General Waste	Low	2	High	2	Low	4	8	Low	01/09/15	29/10/18 r1
<b>11</b>	<b>Landfill site permit</b>	<b>Low</b>	<b>2</b>	<b>High</b>	<b>2</b>	<b>High</b>	<b>8</b>	<b>12</b>	<b>Medium</b>	01/09/15	29/10/18 r2
12	Soil & LimeX 45	Very Low	1	High	2	Low	4	7	Low	01/09/15	29/10/18 r1
13	Site Monitoring	Moderate	3	Very High	1	High	8	12	Medium	01/09/15	29/10/18 r2
<b>14</b>	<b>Bank stability</b>	<b>Moderate</b>	<b>3</b>	<b>High</b>	<b>2</b>	<b>High</b>	<b>8</b>	<b>13</b>	<b>High</b>	01/09/15	29/10/18 r2
15	Site Security & Maintenance	Moderate	3	Moderate	3	Low	4	10	Medium	01/09/15	29/10/18 r1
16	Visual impact	Very Low	1	Moderate	3	Minor	2	6	Low	01/09/15	29/10/18 r1
17	Weighbridge & buildings	Very Low	1	High	2	Minor	2	5	Low	01/09/15	29/10/18 r1
18	Contractors	Low	2	Moderate	3	Low	4	9	Medium	01/09/15	29/10/18 r1
19	Sports field	Low	2	Moderate	3	Low	4	9	Medium	01/09/15	29/10/18 r1
20	Vegetation control	Low	2	High	2	Low	4	8	Low	01/09/15	29/10/18 r1
21	Pest Control	Low	2	High	2	Low	4	8	Low	01/09/15	29/10/18 r2
<b>22</b>	<b>Neighbours</b>	<b>High</b>	<b>4</b>	<b>High</b>	<b>2</b>	<b>Moderate</b>	<b>6</b>	<b>12</b>	<b>Medium</b>	01/09/15	29/10/18 r1
23	Vehicles	Low	2	High	2	Minor	2	6	Low	01/09/15	29/10/18 r1
24	Wildlife & Nature	Very Low	1	Moderate	3	Moderate	6	10	Medium	01/09/15	29/10/18 r2

## **G LIST OF REGULATED AREAS & ACTIONS FROM REGULATORS**

Site has surrendered all permits and licences associated with the historical operation of the site except for the historical Waste Disposal Licence. This has now been varied into a modern EPR Permit. See section 5 of the file for Permit Number EPR/QP3593NF dated 14/10/15.

## **H WASTE MANAGEMENT**

See section 10 of this file for waste transfer notes, consignment notes, and any other duty of care information.

## **I NON REGULATED AREAS**

### **Wildlife on site**

Ensure suitable vegetation and rabbit control.

### **Security & Contractor Management**

Maintain 7am to 7pm security cover 365 days a year and control activities of contractors on site to minimise environmental impact of both intruders and contractors

### **Site Housekeeping**

Inspect site to ensure integrity of the site boundary and maintain site housekeeping standards.

### **Water Management.**

Ensure surface water on site and contained in ponds remains contained and does not erode soil banks on site.

## **J LOCAL ENVIRONMENTAL CRITICAL GOODS AND SERVICES LIST**

Supplier / Goods or Services	Specification/ Competence	Approval
Golder Associates Environmental Consultancy & bank stability, gas & groundwater monitoring	By Contract	Corporate
Waste Disposal contractor	By Contract	H – 8+ years
Septic tank sludge disposal	By Order	H – 8+ years
Clearwell (Command sub contractor), Pest Control	By Contract	Corporate
Weed Control, Ground Control	By Order	H – 8+ years
Grass cutting, Ground Control	By Order	H – 8+ years

Approval, H = Historical, A = Appraisal.

## **K**      **MONITORING SCHEDULE**

See Environmental Permit EPR/QP3593 in section 5 of this file. As referred to in the permit (Table 1.2) parts of the Working Plan monitoring still apply (as they are not excluded) such as weekly monitoring of bank stability & reporting.

## **L**      **ACTION TIMETABLE**

This table covers annual activities and future activities to be considered at review meetings.

Annual Action	Action by	Date	Status
Site Review meetings in approximately March, July & December each year.	PH/KR	As list	Ongoing
Internal audit of Local EMS in approximately May each year.	PH	Annual	Set
Schedule 3, Monitoring. Permit 3.5 & Tables S3.1 to 3.6. Includes each week, Bank stability, Odour & Dust Includes each month, Landfill gas & Groundwater	KR /Golder		Ongoing
Topographical survey undertake annually (3.5.3)	Golder	Annual	Ongoing
Schedule 4, Reporting. Permit section 4.2.2 a – d  Quarterly Schedule 4 reporting of groundwater and landfill gas monitoring	PH	31 Jan  31 Mar, 30 Jun, 30 Sep, 31 Dec	Ongoing
Schedule 5 Notification. Only if Breach of 1% methane limit.	PH	-	
Waste accepted and removed, quarterly as 4.2.4. Required only when waste is accepted and removed	PH		
Report on appropriate measures to minimise pollution within six months of written notice from EA. (4.2.5)		TBC	
Definitive Closure Report for 2015 up to date of permit issue.	PH/ Golder		Completed
Future Action	Action by	Date	Status
Environmental risk assessment review	PH	Sep 24	Last completed 2021
Review & Record of appropriate measure to avoid or reduce waste production, 1.2.1.	PH/KR	2023	
Hydrogeological Risk Assessment review, 3.1.3.	PH	Mar 2027	Ongoing
Mobile Plant remediation permit application and Deployment form.	PH	TBA	

## **M**      **OTHER RECORDS**

- Annual monitoring, see reports on eFacility under York site.
- All records, including this one, are retained electronically on eFacility under, York / Yk Mini EMS

- Previous annual definitive closure monitoring, see Golder Annual Monitoring Reports on eFacility under York / Documents / Other documents.