



ENVIRONMENTAL MANAGEMENT MANUAL

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1. INTRODUCTION



1. Introduction

Leading Solvents was established in 1986 and over the years has grown and evolved into one of the major suppliers of solvents and chemicals in the UK. Situated within the solvent supply site is a waste transfer station which can deal with both hazardous and non-hazardous waste.

Leading Solvent Supplies has a fleet of vehicles which provide delivery of products and collections of wastes across the whole of the United Kingdom. These wastes are brought back to the transfer station where sorting, segregation, treatment and recycling takes place under strict adherence to government guidelines and all applicable legislation.

The development of the operations within Leading Solvents has been widely communicated to clients, companies, local communities and legislative authorities alike with an open door policy. Leading Solvents Limited will always strive to improve their environmental performance.

This is the Environmental Management System of The Waste Transfer Station for LEADING SOLVENT SUPPLIES LTD, Marston Business Park, Tockwith, North Yorkshire, YO26 7QF.

The site is to be used to store collected waste and redundant chemicals and associated waste prior to forwarding to final disposal points and/or to be recycled.

Materials will be collected in fractions, separated into like materials and bulked up and stored until economically viable amounts can be sent for ultimate disposal.

The anticipated materials and maximum daily input quantities there of which may be received are listed in Appendix B of this EMS.



i) Distribution List

Manual No.	ISSUED (Title, Area)	Issue Date
EMS - 01	Company Chairman	
EMS - 02	Site Manager, Transfer Station	
EMS - 03		

All Manuals are electronic controlled copies and no changes can be made by instruction of the Company Chairman.



2. Environmental Policy



LEADING SOLVENTS

ENVIRONMENTAL POLICY

Leading Solvents aim to provide both solvent and chemical distribution and specialist waste management and disposal services to a consistent standard in which protects and enhances the environment.

The objective of this policy is to ensure our commitment to the environment by continually striving for higher standards, so that all customers, employees and regulators have total confidence in our operational practices.

To pursue our pledge of continual environmental improvement and achieve pollution prevention we will:

- Operate at all times in accordance with all relevant legislation applicable to our activities and where possible exceed those requirements.
- Consider and manage the environmental aspects of our activities and services to minimise their impact on the environment.
- Understand and control the risks of our operations to minimise damaging incidents, environmental pollution and nuisance incidents to both local residents and the environment.
- Encourage both customers and regulators to carry out environmental audits on our operations.
- Work with customers to reduce any environmental impact of their operations.
- Continually assess the environmental impact of existing and new operations and services to achieve the highest standards.
- Implement and monitor programmes to ensure that the operations have minimal environmental impact on the amenities in the locality.
- Work with key suppliers to take full account of the environmental impact of the supply chain.
- Educate the workforce to ensure they have sufficient knowledge to meet their responsibilities in safeguarding the environment and possess some sensitivity towards environmental issues.
- Establish a liaison committee or similar with those parties local to the Company operations. We will promote good communication and co-operation at all levels within the company.
- Identify, set, monitor and review targets for our environmental performance including, but not limited to energy use, emissions, recycling and waste production.
- Develop eco-efficient working practises by reducing resource consumption and waste generation. Where possible we strive to recover or recycle our customer's wastes.
- Make this policy publicly available.
- Review this policy on an annual basis.

Signed CHAIRMAN

Dated.....January 2019



3.PLANNING



3. iv) Environmental Management System

The EMS is organised into the following components:

1. Environmental Management Manual
2. Operational Procedures
3. Related Records and Documentation

Purpose:

- ✓ to ensure that all environmental regulatory requirements are met.
- ✓ to ensure that the environmental management system is implemented
- ✓ to meet the requirements of current legislation



3. Planning

3. i) Environmental Aspects

Leading Solvents have evaluated the aspects and impacts of its operation and compiled registers of significant environmental aspects and relevant legislation.

Environmental Aspect : Any element of a companies activities, products or services that can interact with the environment.

Environmental Impact: Any change to the environment wholly or partially resulting from the company activities, products or services.

Hazard: A property or situation that could have a negative effect on the environment.

Note: Environmental Impacts can be both - and + but this environmental management system will focussing on any negative or potentially negative impacts.

A Register of Environmental Aspects has been compiled which is based on a process of risk assessment taking into account the following significant aspects:

- ✓ Is controlled by legislation
- ✓ can cause, or has potential to cause a negative environmental impact
- ✓ has financial implication
- ✓ is of concern to the local community
- ✓ is concern to customers or insurers

3. ii) Register of Legislation and other requirements



This is a register which defines all current legislation which is relevant to the management of the transfer station.

Leading Solvents also recognises the need to adhere other requirements such as

- ✓ Industry Best Practice
- ✓ trade association agreements
- ✓ pollution prevention guidelines
- ✓ agreements with public authorities

The registers and legislation will be reviewed periodically to ensure compliance with all of the above.

This Documents a list of key legislation identified as being applicable to the operations / activities of LSS. For further legal information this is supported by reference to :-

- ✓ Croners Environmental Management
- ✓ The Centre for Environmental and Waste Management
- ✓ The ENDS Report (issued monthly)
- ✓ Netregs

A brief summary of the legislation has been included along with the description of the operational relevance, company policy / procedures and monitoring details.

This document is split into eight sections of legislation.

General Environmental Legislation

Environmental Protection act 1990

Controlled Waste (Registration of Carriers and Seizure of Vehicles) Regulations 1991

Environmental Protection (Controls on Injurious Substances) Regulations 1992

Environmental Protection (Authorisation of Processes) (Determination Periods) Order 1991

Environmental Protection (Duty of Care) Regulations 1991

Environmental Protection (Applications, Appeals and Registers) Regs 1991

Environmental Protection (Prescribed Processes and Substances) Regs 1991

Pollution Prevention and Control Act 1999

Control of Pollution Act 1974

European Communities Act 1972

Air

Clean Air Act 1993

Climate Change Act 2008

Environmental Protection (Control on ozone depleting substances)2011

Land



The Landfill Directive

Water

Water Resources Act 1991

Noise

Clean Neighbourhood and Environment Act 2005

Statutory Nuisance (Appeals) Regulations 1995

Environmental Permitting

Environmental Permitting (England and Wales) Regulations 2010

Waste (England and Wales)Regulations 2011

Waste

Animal By-Products (Enforcement)(England) Regulations 2011

Controlled Waste Regulations 2012

Environmental Civil Sanctions (England) Order 2010

Hazardous Waste (England and Wales) Regulation 2005

List of Wastes (England) Regulations 2005

Environmental Protection (Disposal of PCB and other dangerous substances)(England and Wales) regulations 2000

WEEE Regulations 2006

Waste Management Licensing (England and Wales) Regulations 1992

Producer Responsibility Obligations (Packaging Waste) Regulations 1997

The Waste Battery and Accumulators Regulations 2009

3. III). Objectives and Targets



Leading Solvents has established objectives, taking into account its significant aspects, legal obligations, policies and its commitment to continual improvement.

Objectives

1. Minimise and, where possible, eliminate all types of pollution caused by company operations.
2. Operate within the requirements of the site's PPC licence.
3. Reduce Energy usage.
4. Improve employee awareness of environmental issues

To meet these objectives, certain targets have been set as goals within this Management System.

Targets

1. Zero instances of reportable spillage per month.
2. Zero CAR's, as assessed by EA
3. Reduce energy usage
4. Hold environmental awareness meetings

All environmental objectives and targets in this programme are consistent with the companies' environmental policy.

Target	Actions	Schedule	Responsibilities
Zero instances of reportable spillage per month.	All Spillages and Near Misses to be reported as per procedure	1 Year	All Staff
Zero CAR's, as assessed by EA	Internal Audits and Customer Audits	1 Year	Management Team
Reduce energy usage	Training on carbon management	1 Year	All Staff
Hold monthly environmental awareness meetings		6 months	Management Team



3. iv) Environmental Management System

The EMS is organised into the following components:

4. Environmental Management Manual
5. Operational Procedures
6. Related Records and Documentation

Purpose:

- ✓ To ensure that all environmental regulatory requirements are met.
- ✓ To ensure that the environmental management system is implemented
- ✓ To meet the requirements of current legislation

4. Implementation and Operation



4. Implementation and Operation

4. i) Structure and responsibility.

Chairman

- ✓ The coordination of company activities
- ✓ the responsibility for the environmental policy of the company
- ✓ To provide adequate resources to effectively maintain the companies environmental management system.

The managing chairman may delegate certain duties as he deems necessary. However such delegation does not relieve him of his overall responsibility for the EMS.

Site personnel

The site will only be operated with a minimum of two appropriately qualified or trained personnel, one of whom will be responsible for the day to day running of the facility.

The overall personnel structure can be found in Appendix E.

While different staff all have separate duties and levels of responsibility, all staff involved with, or working at the facility will be responsible for ensuring that it is operating in accordance with the Permit Conditions and this EMS.

All staff undergo full training and induction programmes.



Management

A Site Manager who is a qualified COTC Holder in Treatment and Transfer, trained and experienced in similar duties will manage the Transfer Station on a day-to-day basis.

When the manager is absent a Team Leader or senior Operative will be responsible for the running of the site and will be similarly qualified and competent to perform this function.

Thus when the site is open one person will always be responsible for the day-to-day management.

Their duties will include ensuring the satisfactory execution of the following tasks:

- ✓ General Day-to-day management of the facility
- ✓ To Supervise site employees ensuring that they follow all procedures and work instructions.
- ✓ To communicate environmental information in order to increase the overall employee awareness of environmental issues within the company.
- ✓ to facilitate two way communication of relevant environment aspects between department staff and top management
- ✓ to follow all documented work instructions and procedures
- ✓ to communicate any abnormal environmental aspects of operations to the relevant manager
- ✓ to maintain a clear understanding of the Leading Solvent Supply Environmental Policy
- ✓ To carry out risk assessments for departmental operations and activities.
- ✓ to carry out environmental audits in accordance with documented procedures.
- ✓ To identify, investigate and record environmental non conformance.
- ✓ Holds a current and up to date COTC for Treatment and Transfer of Wastes
- ✓ Checking and evaluation of all incoming loads
- ✓ Sampling and testing of standard and difficult loads
- ✓ Maintenance of samples
- ✓ Segregation for storage and repackaging of wastes for transfer
- ✓ Maintenance of site records
- ✓ Completion of documentation
- ✓ Keeping of records
- ✓ Inspection of storage facilities
- ✓ Initiating & supervising maintenance
- ✓ General Day-to-day management of the facility



Technical Staff - Chemist

More than one person on the site may fill the role of Chemist at any one time.

A chemist, qualified to the satisfaction of the Agency will be available for carrying out specific testing and interpretation, and will be responsible for specifying the monitoring and testing procedures and ensuring they are properly carried out and documented.

Initially the chemist and site manager may be one and the same person.

The chemist will also be responsible for ensuring the laboratory is fully equipped and supplied and that all testing is carried out in accordance with current procedures.

- ✓ To follow all documented work instructions and procedures
- ✓ when facing a problem or NCR not covered by documented procedures or work instructions to consult the relevant manager
- ✓ to communicate any abnormal environmental aspects of operations to the relevant manager
- ✓ to maintain a clear understanding of the Leading Solvent Supply Environmental Policy
- ✓ Checking and evaluation of all incoming loads
- ✓ Sampling and testing of standard and difficult loads
- ✓ Maintenance of samples
- ✓ Segregation for storage and repackaging of wastes for transfer
- ✓ Maintenance of site records
- ✓ Completion of documentation
- ✓ Keeping of records
- ✓ Inspection of storage facilities
- ✓ Initiating & supervising maintenance
- ✓ General Day-to-day management of the facility



Team Leader - Operative and Drivers

A minimum of two competent and trained people (including the manager or deputy) will be on site during the normal working hours.

The site operatives may be qualified under the WAMITAB guidelines but will at least have received training in the handling and storage of inert, difficult and hazardous wastes.

Their duties will include:

- ✓ To follow all documented work instructions and procedures
- ✓ when facing a problem or NCR not covered by documented procedures or work instructions to consult the relevant manager
- ✓ to communicate any abnormal environmental aspects of operations to the relevant manager
- ✓ to maintain a clear understanding of the Leading Solvent Supply Environmental Policy
- ✓ Sampling of loads
- ✓ Loading and off loading wastes
- ✓ Generally assist the manager in carrying out his duties
- ✓ Cleaning and routine maintenance
- ✓ Other duties as required

The site will only be operated with a minimum of two appropriately qualified or trained personnel, one of whom will be responsible for the day to day running of the facility. While different staff all have separate duties and levels of responsibility, all staff involved with, or working at the facility will be responsible for ensuring that it is operating in accordance with the Permit Conditions/Working Plan and the EMS.

4. ii) Training

Leading Solvents has established a procedure for identifying the training needs for employees including the requirement of environmental awareness training.

This document describes the methods by which training needs will be identified and sets out clearly the company's commitment to ensuring that all employees are trained to a high operational standard. This training methodology recognises the need for employees to appreciate the importance of conformance with the environmental policy and procedures; with the requirements of the environmental management system.



4. iii) Communication within

Leading Solvents will ensure that sufficient and relevant information about environmental aspects, the environmental policy and the EMS system is communicated between all levels and functions of the organisation.

Normal circumstances

There are a number of standard duties and reports required by regulation that are the responsibility of the Site Manager.

IPC monthly submissions

Waste Management Licence quarterly statistics

Any other standard information or assistance required by regulatory bodies such as The Environment Agency (EA), Health & Safety Executive (HSE), North Yorkshire Council, Emergency Services etc

Abnormal Circumstances

The Site Manager, as leader of the emergency response team, is primarily responsible for communicating with any external bodies involved in the management of the incident. The Site Manager is also the preferred source for reporting breaches of consent or licence conditions to the appropriate enforcing authority.

Only The Chairman is permitted to communicate with the media in the event of an emergency situation.



Environmental Management Documentation

The Environmental Management System operated by the company consists of an Environmental Management Manual, Environmental Procedures and published legal data. These documents outline the key areas of management responsibility for all associated activities and services. In addition, they provide details of the methods and all supporting documentation.

Environmental Management Manual,
Environmental Procedures.
Standard Operation Procedures, Significant Environmental Aspects Register.
Work Instructions and Risk Assessments.
Records, Forms and Other Relevant Documents.

4. v) Document Control

All the documents referred to in the environmental management manual are component parts to the environmental management system.

- ✓ Documents are properly authorised and issued to the relevant departmental personnel
- ✓ master document lists are maintained showing which documents are controlled, their revision status and their locations
- ✓ all EMS documents are reviewed as required and revised and necessary by relevant personnel
- ✓ current versions of documents are available at locations where they are required to support the functioning EMS

Obsolete documents are removed and replaced when necessary.



4. vi) Operational Control

Operational Control of Activities and Services

Operational control of operations and activities that have environmental impacts are affected on three levels.

LSS exercises operational control by:

- Establishing and maintaining documented procedures related to the identifiable significant aspects of goods and services used by the company;
- Communicating relevant procedures and requirements to suppliers and contractors;
- Following documented emergency response and spillage procedures.

Responsibility

The Site Manager has responsibility for co-ordinating operational activities and services that have a negative or a potentially negative impact on the environment. This ensures that all significant environmental aspects are identified and controlled by stipulating operating criteria in the procedures to prevent environmental damage and the likelihood of prosecution.

Operational Control of Activities

Operational control of operations and activities that have environmental impacts are managed via, Procedures and Work Instructions and Checks.

All the operations and activities that result in the impacts documented in all three levels are planned by the company. This includes maintenance to ensure they are carried out under specified controlled conditions to guarantee compliance with the Environmental Policy and objectives/targets at all times.

Environmental Impacts have legal implications and are closely monitored and controlled by specific procedures.



4. vii) Emergency Response

Emergency Response Plans

Following the identification of those potential emergency situations, an emergency response plan has been drawn up for the site. This plan is displayed in various locations around the site and is a part of the induction process.

Responsibility

Each employee of LSS has a responsibility to adhere to the instructions documented in the Emergency Plan and Procedures.

Testing of Emergency Procedures

The Company recognises the necessity to periodically test, where practicable, its Emergency plans and procedure. It is the responsibility of the site manager to periodically carry out emergency drills

5. Checking



Monitoring and Measurement

There are documented procedures to monitor and measure activities that have been identified as having potential problems and have a potential negative impact to the environment.

On the basis of the results of the monitoring and measuring process the chairman to assess the compliance of the various components of the EMS to

- ✓ relevant legislation
- ✓ the environmental policy
- ✓ environmental objectives and targets
- ✓ environmental/standard operating procedures

Calibration

Monitoring Equipment is calibrated and maintained according to the manufacture instructions.

When the results of the monitoring and measurement demonstrate non compliance with the environmental Policy, applicable environmental legislation or other relevant standards, corrective actions are identified and implemented.

Non Conformance

All non conformances will be logged and investigated so that action is taken to mitigate any impact caused by the company operations.

When it is necessary to revise any procedure in the light of the corrective or preventative action the chairman will sign off these changes.

Different Processes in place to detect non conformance

- ✓ Internal Audits
- ✓ external Audits by EA
- ✓ external Audits by customers
- ✓ complaints or communications from interested parties
- ✓ monitoring and measurement results

Environmental Records

LSS will maintain environmental records for the following reasons:-

- ✓ Demonstrate compliance to the environmental policy
- ✓ Demonstrate compliance to the EMS
- ✓ Demonstrate compliance to the PPC
- ✓ Demonstrate compliance to the regulatory bodies



5. iv Environmental Management System Audit

The Chairman is responsible for the management of internal environmental audits. He produces an annual audit schedule and forwards a copy of this schedule to the relevant manager. It is the responsibility of the Chairman to ensure that the audit is carried out by the date specified, in order to determine whether or not the environmental management system:

- Is conforming to the documented arrangements for environmental management
- Is being properly implemented and maintained.

5. v) Management Review

The Chairman, Health, Safety & Environment Manager and all Senior Managers review the environmental management system at least annually. This takes place at Management Review meetings at which minutes are taken. The Health, Safety & Environment will organise a programme to ensure that all component parts of the EMS are reviewed over an annual period. This is to ensure that all aspects of the system are still relevant and being effectively maintained.

The Management Review focuses on, but is not be restricted to, the following topics:

- ✓ internal legal compliance review;
- ✓ internal audits;
- ✓ external audits – EA / Clients / Other Regulatory Bodies;
- ✓ environmental management programme;
- ✓ complaints/communications;
- ✓ uncompleted corrective action reports;
- ✓ incident reports;
- ✓ system suitability;
- ✓ All components of the EMS.

The Health, Safety & Environment Manager is responsible for determining the agenda of these meetings and for ensuring that the minutes of these reviews are kept for a minimum of two years.



5. vi) Environmental Procedures

A full listing of all procedures supporting the operation of the Company's Environmental Management System can be found in the Procedures Register