# Environmental Management System

Prepared on Behalf of:

**Luton Metal Recycling Limited**

**The Railway Arches**
**Colindeep Lane**
**Colindale**
**NW9 6HD**

**Environmental Permit:**
**YP3691NW**

**DOCUMENT CONTROL SHEET**

| | |
|---|---|
| **Site:** | **The Railway Arches** |
| **Project:** | **Environmental Compliance** |
| **Title:** | **Environmental Management System** |
| **Issue:** | **1.0** |
| **Date:** | **06.05.26** |
| **Author:** | **Shane Ronald Tasker**<br>**TechIOSH TechMCIWM PIEMA EA**<br>**(IEMA Qualified Auditor)** |

## Key Site Information

| **SITE DETAILS** | | | |
|---|---|---|---|
| Operator: **Luton Metal & Recycling Limited** | | | |
| **SITE CONTACTS** | Name | Office Hours (specify) | Out of hours |
| Directors | **Jason Glynn** | 01727 221750 | 01727 221750 |
| | **Jason Neall** | 01727 221750 | 01727 221750 |
| **EMERGENCY SERVICES** | | Office Hours | Out of hours |
| Police, Fire Ambulance: | | 999 | 999 |
| **REGULATORS** | | Office Hours | Out of hours |
| Environment Agency (emergency hotline) | | 0800 80 70 60 | 0800 80 70 60 |

# Table of Contents


1 Introduction ..... 1
1.2 Interpretation ..... 1
1.3 General Management ..... 1
1.4 Implementation and Operation ..... 2
1.5 Sufficient Competent Management ..... 2
1.6 Checking & Corrective Action ..... 2
1.7 Site Infrastructure ..... 2
1.8 Equipment Inventory ..... 3
2 Environmental Legal Register ..... 4
3 Operations ..... 5
3.1 Specified Waste Management Operations ..... 5
4 Permitted Wastes ..... 6
5 Permitted Wastes ..... 6
6 Waste Acceptance Procedures ..... 7
6.1 General ..... 7
6.2 Third party deliveries ..... 7
6.3 Ferrous Metal Acceptance Procedures ..... 8
6.4 Non-Ferrous Metal Waste Acceptance Procedure ..... 9
6.5 Operational Process Flow Diagram (Ferrous & Non-Ferrous Metals) ..... 10
7 Operational Process Flow Diagram (WEEE ATF) ..... 11
8 Oversized Ferrous Metal Processing (Hot Works) Procedure ..... 11
9 Storage Management ..... 12
10 Despatch Procedure ..... 12
11 End of Day Site Close Down Procedures ..... 13
12 Duty of Care ..... 13
12.2 Notification ..... 13
12.3 Avoidance, recovery, and disposal of wastes produced by the activities ..... 14
12.4 Site Security ..... 14
13 Training ..... 15
14 Maintenance ..... 16
14.1 Daily Checks ..... 16
14.2 Monthly Checks ..... 16
14.3 Annual Checks ..... 16
14.4 Maintenance Checklist ..... 17
15 Contingency Planning ..... 18

16 Management ..... 19
16.2 Monitoring ..... 19
16.3 Dust Emissions ..... 19
16.4 Dust Monitoring ..... 19
16.5 Odour Emissions ..... 19
16.6 Odour Monitoring ..... 19
16.7 Noise & Vibration Emissions ..... 20
16.8 Noise & Vibration Monitoring ..... 20
16.9 Scavenging Birds ..... 20
16.10 Pests ..... 20
16.11 Litter ..... 20
17 Emergency Procedures ..... 21
17.2 Environmental Incident Record Form Procedure ..... 21
18 Complaints Investigation Procedure ..... 21
19 Leakages or Spillages Procedure ..... 22
20 Equipment & Machinery Malfunction & Failure Procedure ..... 23
21 Non-Conformance Procedure ..... 23
22 Periodic Review ..... 23
Appendix EMS1: Environmental Incident Record Form ..... 24
Appendix EMS2: Complaint Record Form ..... 25
Appendix EMS3: Non-Conformance Record Form ..... 26
Appendix EMS4: Environment Agency Notification Form ..... 27
Appendix EMS5: Accident Investigation Forms ..... 28
Appendix EMS8: Site Infrastructure Plan ..... 30
Appendix EMS9: Climate Change Risk Assessment ..... 31

# 1 Introduction

1.1.1 This Environmental Management System has been produced in accordance with Environment Agency Guidance 'Develop a management system: environmental permits'.

**Table 1: Develop a Management System & Environmental Management System Cross Reference**

| Develop a Management System Guidance Contents | Environmental Management System Sections |
|---|---|
| Site Infrastructure | Section 1.7 |
| Site Operations | Sections 3-9 |
| Site Equipment Maintenance Plan | Section 13 |
| Contingency Plan | Section 14 |
| Accident Prevention & Management Plan | Sections 15-20 |
| Complaints Procedure | Section 17 |
| Climate Change | Appendix EMS9 |
| Managing Staff Competence & Training Records | Sections 1.5 & 12 |
| Keeping Records | Section 11 |
| Review Your Management System | Section 21 |
| Site Closure | Section 14 |

## 1.2 Interpretation

1.2.1 'Responsible Person' means any person responsible for monitoring and reporting as detailed in this EMS (Directors/Members of the Compliance Team/Technically Competent Manager/Site Manager/Supervisor).

## 1.3 General Management

1.3.1 Activities will be operated and managed in accordance with this site-specific Environmental Management System (EMS) and the governing Environmental Permit, using sufficient competent persons and resources.

1.3.2 All employees having duties that are or may be affected by the matters set out in this EMS will have access to a copy of this document and the governing permit. Documentation will be clearly labelled and displayed within the Site Office.

## 1.4 Implementation and Operation

1.4.1 Sufficient resources essential to the effective implementation and update of this EMS will be put in place and maintained. At least one Responsible Person is present when the site is operational.

1.4.2 Training needs have been identified to ensure that all personnel whose work may contribute towards the safe and compliant operation of the site have received appropriate training.

## 1.5 Sufficient Competent Management

1.5.1 Sufficient competent management will be maintained, and the minimum TCM attendance requirements will be met. Attendance will be recorded in the Site Diary.

1.5.2 Continuing competence will be maintained and records demonstrating this will be kept onsite.

## 1.6 Checking & Corrective Action

1.6.1 A Responsible Person will handle and investigate any incidents that may result in non-compliance with this EMS, taking action to mitigate any impacts caused and initiating and completing any corrective/preventive action required. Any such action will be used to inform changes in documented procedures.

## 1.7 Site Infrastructure

**Table 2: Site Infrastructure Provisions**

| Provisions | Description |
|---|---|
| Interceptor/Drainage | Sealed drainage to interceptors. |
| Security | Concrete perimeter walls with lockable access gate, 24-hour security (staff during the day and security during non-operational hours). |

## 1.8 Equipment Inventory

**Table 3: Critical Equipment Inventory (Indicative)**

| Onsite Provisions |
| --- |
| Mobile/Static Balers |
| 360 Material Handlers |
| Forklifts |

N.B. Neither a prescriptive nor an exhaustive list.

# 2 Environmental Legal Register

**Table 4: Environmental Legal Register (Not an exhaustive list of requirements)**

| Legislation | Summary/Obligations | Compliance Documentation Location | Responsibilities |
|---|---|---|---|
| Environmental Permit | Overarching permit that stipulates the conditions under which the site must operate. | Copy of permit held within the Site Office. Compliance documentation includes this Environmental Management System. | Responsible Person |
| Waste Carriers Licence | Waste management companies moving wastes must be registered as an 'upper tier' waste carrier. | Copy of registration is held within the Site Office. | Responsible Person |
| Environmental Permitting Regulations 2016 (As Amended) | Overarching Legislation for waste management facilities (i.e. compliance with permit conditions & the requirement to have a permit as a waste activity). | Copy of permit held within the Site Office. | Responsible Person |
| The Waste (England and Wales) Regulations 2011 Waste Hierarchy (As Amended) | Overarching Legislation for the management and handling of waste. Ensure waste is managed as far up the waste hierarchy as possible. Evidence should be retained within the Site Office to support any minor deviations. | Compliance with the waste hierarchy is assured by the procedures detailed within this Environmental Management System & all transfer notes include the required declaration. | Responsible Person |
| The Environmental Protection Act 1990: Copies of all non-hazardous waste Duty of Care waste transfer notes must be kept onsite for 2 years. | Overarching Legislation for waste management activities. Duty of Care requirement for the movement of all waste, (not required for internal movements or movements within the same company). These must be kept for two years. | All Duty of Care waste transfer notes are held in the Site Office for two years. | Responsible Person |
| The Hazardous Waste Regulations 2005: *Hazardous Waste Consignment Notes*<br><br>*(Recommendation that the EA template for Consignment Notes is used)* | Overarching legislation for wastes that are classified as hazardous. Hazardous waste must not be mixed with other hazardous or non-hazardous wastes.<br>A Consignment Note must accompany all hazardous waste movements and copies must be kept onsite for 3 years. | All hazardous waste Consignment Notes are kept within the Site Office for three years. | Responsible Person |

# 3 Operations

## 3.1 Specified Waste Management Operations

3.1.1 Waste management operations are listed in Table 5.

**Table 5: Specified Waste Management Operations**

TBC

# 4 Permitted Wastes

# 5 Permitted Wastes

5.1.1 Primary waste types received onsite are presented in Table 6 below with associated waste codes.

**Table 6: Permitted Waste Types**

TBC

**Table 7: Maximum Permitted Throughput**

| Waste Category | Annual Tonnage |
|---|---|
| Metal/WEEE Wastes | 25,000 (Permitted) |
| **Total** | **25,000 (Permitted)** |

# 6 Waste Acceptance Procedures

## 6.1 General

6.1.1 Materials are accepted into the site both from third party deliveries and by way of collections from customers.

6.1.2 Materials collected from customer sites: -

1. When a collection is scheduled the prohibited material(s) are clearly stated & reflected in terms of collection.
2. When collecting materials, the driver will inspect to check as far as practicable for any prohibited material present.
3. If prohibited material is present, the customer will be notified and advised of the following courses of action available: -
   a) Remove material and leave at the customer's premises.
   b) Accept material and dispose of directly to a site permitted to accept the waste at the customer's expense.

## 6.2 Third party deliveries

6.2.1 On entering the site, waste-carrying vehicles will initially be weighed and visually inspected (if possible) by the weighbridge operator to ensure that the wastes are as described on the transfer note, are in accordance with the permitted waste types and in a condition suitable for deposit and processing in the designated area of the site.

6.2.2 Operatives are aware of permitted waste types, what the load ought to contain and whether it is suitable for deposit within the material specific Waste Acceptance Area. Any waste that Operatives are unsure of in nature will be left in situ and the advice of a member of the site management team will be sought in the first instance. This may result in reverting to the Agency for advice. In the absence of any specific guidance from the Agency, the waste(s) will be isolated and transferred to a suitably permitted site as soon as practicable.

## 6.3 Ferrous Metal Acceptance Procedures

1. Ferrous metal deliveries are directed to deposit their loads within the Ferrous Metal Waste Acceptance Area.
2. Operatives inspect materials during the unloading process & once deposited within the Acceptance Area.
3. In the event of non-permitted wastes or unsuitable materials being detected during the inspection process the following procedures will be followed: -
   a) If visual inspection of waste prior to tipping identifies unsuitable wastes or items, the vehicle will not be allowed to unload.
   b) If once tipped unsuitable waste or item(s) are identified, the waste/item(s) will be relocated and if necessary isolated within the non-permitted waste isolation facility (a skip/container).
   c) Any pressurised canisters detected will be isolated, removed and stored within the Pressurised Canister (lockable) Cage.
   d) Details of all such incidents will be recorded in the Site Diary. In each case a record of the incident will be noted including time, description, and carrier. (Customers will be contacted & made aware of permitted waste types if any non-permitted waste types are identified)
4. Once the Operative has accepted the materials the delivery vehicle will be directed back to the weighbridge, for weighing and finalisation of documentation.
5. Operatives will continue to inspect all materials deposited whilst processing operations are undertaken as necessary (baling/shearing).
6. Processed ferrous metals will be allowed to cool prior to stockpiling within the appropriate bay/container, dependent on the grade of material.
7. All materials will be inspected prior to stockpiling to ensure no non-permitted wastes are present. In the event of identification these materials will be relocated, (if necessary), isolated and stored within the non-permitted isolation facility (a skip/container).

## 6.4 Non-Ferrous Metal Waste Acceptance Procedure

1. Non-Ferrous metal deliveries are directed to deposit their loads within the Non-Ferrous Metal Waste Acceptance Area.
2. Operatives will inspect all materials deposited within the Non-Ferrous Metal Acceptance Area to ensure that no non-permitted wastes or unsuitable materials are present.
3. Non-Ferrous Metals are individually weighed by type & grade allowing a detailed examination of all wastes present. (Includes batteries & cables for example).
4. In the event of non-permitted wastes or unsuitable items being detected the following procedures will be followed: -
    a) If visual inspection of waste prior to tipping identifies unsuitable wastes the vehicle will not be allowed to unload.
    b) If once tipped unsuitable waste is identified, the waste/item(s) will be relocated and if necessary isolated within the non-permitted waste isolation facility (a skip/container).
    c) Details of all such incidents will be recorded in the Site Diary. In each case a record of the incident will be noted including time, description, and carrier.
5. Waste materials accepted will be stored in receptacles as specified on the Site Location Plan.
6. Operatives will inspect all materials accepted to ensure that no non-permitted wastes or unsuitable materials have been inadvertently accepted or stored. In this eventuality, these materials will be removed and if necessary isolated within the non-permitted waste isolation facility (a skip/container).

## 6.5 Operational Process Flow Diagram (Ferrous & Non-Ferrous Metals)

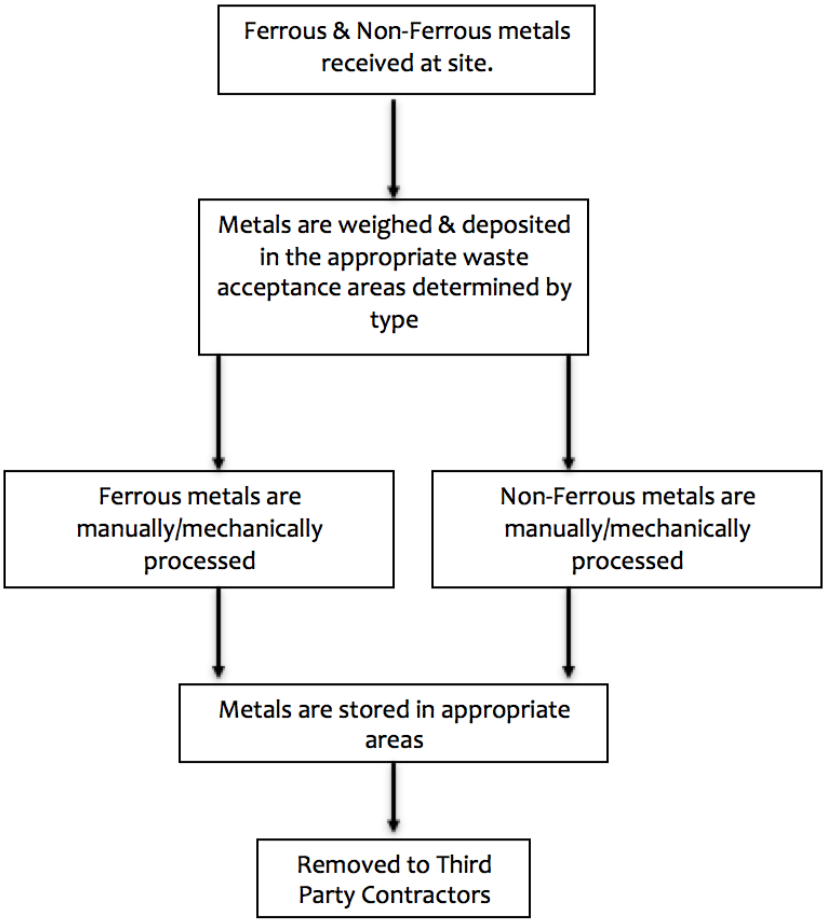



**Figure 1: Operational Flow Diagram (MRS)**

# 7 Operational Process Flow Diagram (WEEE ATF)

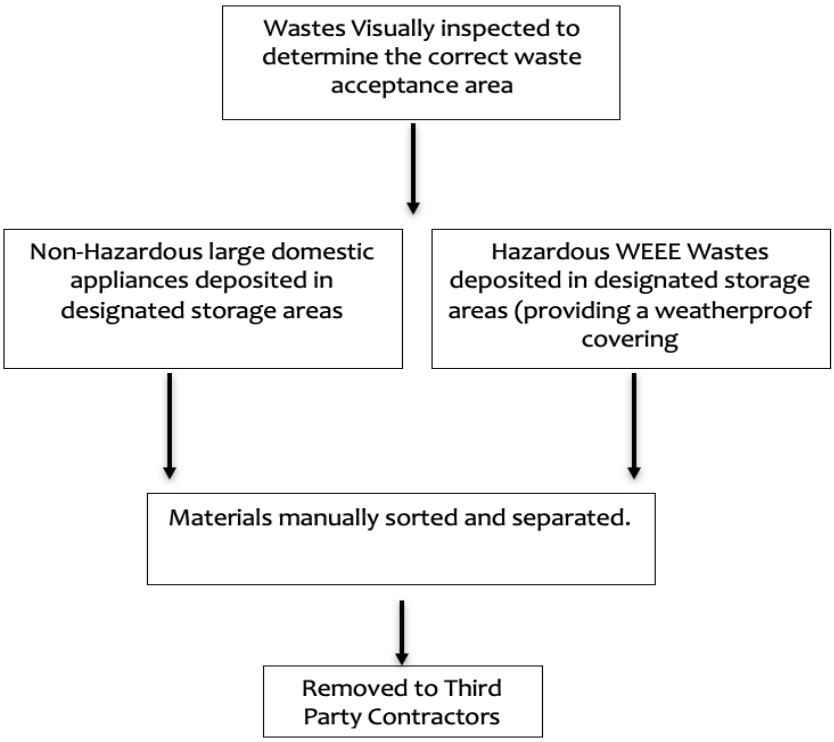



**Figure 2: WEEE ATF Operational Flow Diagram**

# 8 Oversized Ferrous Metal Processing (Hot Works) Procedure

8.1.1 Some ferrous metals are reduced in size, in a designated area of the site via hot cutting equipment (oxygen & propane) to enable processing & onward transportation. All hot work activities will be undertaken at least 6 metres from any accumulation of materials and only by sufficient competent persons on the approval of the Management Team. Fire extinguishers will be available at all times 'hot works' are undertaken.

# 9 Storage Management

9.1.1 All wastes are stored in designated storage areas/bays/containers and within the confines of the site.

9.1.2 All waste management operations are conducted on an impermeable surface with sealed drainage.

9.1.3 Fluid storage containers are stored, managed & removed using the correct procedures to ensure the health & safety of all site operatives & overarching legal compliance.

9.1.4 Absorbents will be deployed to control any spillages and/or leakages. Absorbents may include spillage kits, sawdust and/or sands. In the event of deployment, a container will be provided to store these hazardous materials (this may include storing alongside oil filters), which will be collected by an authorised waste Management Company.

# 10 Despatch Procedure

1. Wastes stored within bays/containers/areas will be placed within the despatch vehicle using mechanical equipment.
2. Containers will be loaded directly onto the collection vehicle.
3. Once loaded, vehicles move to the weighbridge, the weight is recorded, and the vehicle sheeted for despatch.
4. All drivers will inspect their loads prior to leaving the site to prevent spillages of waste or debris on the entrance/exit roads of the site.

# 11 End of Day Site Close Down Procedures

11.1.1 A Responsible Person will ensure that: -

1. All equipment is switched off.
2. All mobile plant is at a minimum safe distance from any risk areas, including any accumulations of combustible materials.
3. All plant and equipment is switched off.
4. There are no visible signs of flames, smoke, or embers onsite.
5. All non-essential equipment & lighting within the site is switched off.
6. No one remains onsite during non-operational hours.

# 12 Duty of Care

12.1.1 All waste received by and leaving from the site will be accompanied by waste transfer notes recording the quantity and type of waste removed and the authorised status of the destination.

12.1.2 Luton Metal & Recycling Limited take its Duty of Care responsibilities seriously and understands them to require it to: -

1. Check the authorised status of all waste carriers utilised;
2. Ensure that wastes leaving the site are going to a suitably authorised facility;
3. Complete compliance status checks from time to time;
4. Produce & maintain appropriate records relating to wastes received and removed.

## 12.2 Notification

12.2.1 Luton Metal & Recycling Limited will notify the Environment Agency without delay in the event of detecting any of the following: -

1. Any malfunction, breakdown or failure of equipment or techniques, accident or emission of a substance not controlled by an emissions limit which has caused, is causing, or may cause significant pollution;
2. The breach of a limit specified in the permit;
3. Any significant adverse environmental effects.

12.2.2 The Environment Agency will be notified without delay with written confirmation (i.e., an email & telephone conversation with the local Enforcement Officer) of such incidents, which must be submitted within 24 hours.

12.2.3 The Environment Agency will be notified within 14 days of the occurrence of the following matters, except where such disclosure is prohibited by Stock Exchange Rules.

Where the operator is a registered company: -

- Any change in the operator's trading name, registered name, or registered office address; and

- Any steps taken with a view to the operator going into administration, entering into a company voluntary arrangement, or being wound up.

## 12.3 Avoidance, recovery, and disposal of wastes produced by the activities

12.3.1 The requirements laid down by The Waste Regulations 2011 will be complied with as far as possible and in particular: -

a) Waste managed by the activities; and

b) All waste generated by operations conducted onsite will be dealt with in accordance with the waste hierarchy; and

c) If disposal is necessary, a manner will be selected which reduces the potential impact on the environment.

12.3.2 All wastes generated will be quantified & characterised using appropriate competence.

12.3.3 Any hierarchy deviations will be justified and recorded.

12.3.4 Every three years a Company Director will review all arrangements & practices around the management of wastes. Steps identified by such a review will be implemented as necessary & deemed appropriate to operational compliance.

## 12.4 Site Security

12.4.1 Site security arrangements include concrete perimeter walls with a lockable access gate.

12.4.2 CCTV cameras are in operation 24-hours a day.

12.4.3 Outside operational hours the site access gates are shut, securely locked, and remotely monitored.

12.4.4 Security arrangements (concrete walls & access gate) are inspected on a weekly basis. Any necessary repairs will be completed as soon as possible to maintain the sites perimeter, which may result in interim repairs until an external contractor can attend site.

12.4.5 Directors constantly evaluate all onsite security arrangements.

# 13 Training

13.1.1 A Responsible Person completes a training needs assessment to ensure all new employees have the required training to complete their day-to-day tasks correctly & safely; these needs are presented at Table 11 below.

13.1.2 Training records are held within the Office.

**Table 8: Training Matrix (Recommendations)**

| Training Requirements | | Responsible Persons | Operatives |
|---|---|---|---|
| Internally Completed Training ('Toolbox Talks') | Permit Requirements | | |
| | Environmental Management System Procedures | | |
| | Emissions Management Procedures | | |
| Externally Accredited Training | Mechanical Equipment | | |
| | First Aider | | |
| | Fire Marshall | | |
| | Fire Awareness | | |

| Key | |
|---|---|
| **Required** | |
| **Not Required** | |

# 14 Maintenance

## 14.1 Daily Checks

14.1.1 All mechanical equipment is inspected on a daily basis prior to the commencement of operations.

14.1.2 Defects are raised & recorded as appropriate.

14.1.3 If repairs cannot be completed onsite an appropriate external contractor (dependent on the type of malfunction) will be contacted to affect a repair.

## 14.2 Monthly Checks

14.2.1 A Responsible Person will undertake a thorough inspection of all critical site infrastructure & equipment on a monthly basis, which is recorded in the Site Diary.

14.2.2 Repairs will be recorded where appropriate. If a repair cannot be completed onsite, then the faulty item will be isolated, and arrangements made for repairs to be affected as soon as practicable.

## 14.3 Annual Checks

14.3.1 Routine mechanical maintenance is scheduled against the records kept in the Office. These records determine the frequency at which inspections take place.

14.3.2 All records are kept in the Office.

## 14.4 Maintenance Checklist

**Table 9: Maintenance Checklist**

| Maintenance | Frequency | | | | | Location of Instructions |
|---|---|---|---|---|---|---|
| | Day | Week | Month | Year | 5 years | |
| Internal | | | | | | |
| Clean up spills on surfaced areas. | O | | | | | Office |
| Inspect integrity of site security perimeter | | R | | | | Office |
| Inspect integrity & state of site surfaces/access road | O | R | | | | Office |
| Clean site surfaces to prevent 'track-out'. | O | | | | | Office |
| Inspect storage areas | O | R | | | | Office |
| Inspect electrical equipment | | R | | | | Office |
| Inspect fire fighting equipment | | R | | | | Office |
| Inspect integrity of drainage channels | | R | | | | Office |
| Inspect integrity of interceptor | | | R | | | Office |
| External | | | | | | |
| Operational Fleet (Servicing/MOT) | | | | E | | Office |
| Mechanical Lifting Equipment (LOLER) | | | | E | | Office |
| Fire extinguishers | | | | E | | Office |
| PAT testing | | | | E | | Office |
| Electrical Wiring | | | | | E | Office |

| Key | |
|---|---|
| Operative | O |
| Responsible Person | R |
| External Contractor | E |

# 15 Contingency Planning

**Table 10: Contingency Measures**

| Eventuality | Procedures/Measures |
|---|---|
| Accident | Measures may include: -<br>1. The affected area will be isolated.<br>2. If necessary, the emergency services will be contacted.<br>3. A Responsible Person will decide on a case-by-case basis if cessation of operations around the affected area is necessary until the appropriate measures have been taken and/or the emergency services have arrived. |
| Supply Chain Failure (Including Transportation Shortages) | Measures could include: -<br>1. Confirm current storage times for materials accumulated onsite.<br>2. Increase monitoring of material stockpiles onsite.<br>3. Contact outlets for the specified stream and arrange transportation.<br>4. If the outlet is not receiving the specified waste stream, contact other outlets. |
| Breakdowns (Mechanical Equipment) | Measures could include: -<br>1. Immediate isolation of the affected machinery.<br>2. Deploy absorbents if required.<br>3. External contractors instructed to complete repairs.<br>4. Hire in relief equipment in interim if needed.<br>5. Reschedule material despatch to align with scheduled repairs and/or relief machinery availability. |
| Site Closure | Measures could include: -<br>1. Appropriate signage will be erected; notifying any visitors that operations have been suspended.<br>2. Advise customers of the situation.<br>3. Wastes will not be accepted on to site.<br>4. Contact all potential outlets to ensure that all waste material is managed in accordance with the waste hierarchy where possible.<br>5. Notify EA that customers & receiving outlets have been contacted and provide scheduled dates for material removal.<br>6. Notify EA once stockpiles have been reduced to acceptable level. |

# 16 Management

16.1.1 This section of the site EMS addresses any potential emissions that may arise from site operations. It demonstrates the measures taken to prevent or minimise the release of emissions such that they do not cause pollution as required by Condition 3 of Permit: -

*"Pollution" means emissions as a result of human activity, which may: -*

*(a) Be harmful to human health or the quality of the environment;*

*(b) Cause offence to a human sense;*

*(c) Result in damage to material property; or*

*(d) Impair or interfere with amenities and other legitimate use of the environment.*

## 16.2 Monitoring

16.2.1 Responsible Persons will remain mindful of the potential impact operations could have on the local environment and take all reasonable steps to avoid giving rise to pollution or nuisance as a consequence of site operations.

16.2.2 In the event of ongoing issues or concerns being identified these will be investigated and appropriate actions implemented. This may include the formulation of management plans.

16.2.3 In the event of an emissions release that has caused, is causing, or may cause significant pollution, the Environment Agency will be notified within 24 hours, advice taken, and action recorded.

## 16.3 Dust Emissions

16.3.1 It is not expected that dust generation/release will present any significant problems due to the nature of the wastes dealt with onsite.

## 16.4 Dust Monitoring

16.4.1 Operatives & Responsible Persons will monitor conditions on an ongoing basis throughout the working day. Relevant observations will be recorded in the Site Diary.

## 16.5 Odour Emissions

16.5.1 It is not expected that odour generation/release will present any significant problems due to the non-putrescible nature of wastes dealt with onsite.

## 16.6 Odour Monitoring

16.6.1 Responsible Persons will monitor odour levels on an ongoing basis throughout the working day. Relevant observations will be recorded in the Site Diary.

## 16.7 Noise & Vibration Emissions

16.7.1 The overall noise emissions amenity impact is considered to be low, due to the isolated nature of the operation & onsite controls/procedures.

16.7.2 Noise generated on the site would principally be associated with the operation of mechanical equipment.

16.7.3 Silencing equipment is fitted to all plant/machinery where appropriate and all equipment is operated in accordance with the manufacturer's recommendations.

16.7.4 Maintenance inspections are carried out on all equipment and machinery. Any malfunctions or defects are therefore identified at the earliest opportunity.

## 16.8 Noise & Vibration Monitoring

16.8.1 Responsible Persons will monitor noise levels on an ongoing basis throughout the working day. Relevant observations will be recorded in the Site Diary.

## 16.9 Scavenging Birds

16.9.1 It is not expected that scavenging birds will present any significant problems as the site will not be accepting any putrescible or food wastes.

16.9.2 Responsible Persons will monitor conditions on an ongoing basis throughout the working day. Relevant observations will be recorded in the Site Diary.

## 16.10 Pests

16.10.1 The risk of infestation of pests and vermin is minimised by maintaining general good housekeeping and ensuring that the site is clean and tidy.

16.10.2 Responsible Persons will monitor site conditions for any signs of pest infestation.

16.10.3 In the event that flies, or other such problematic insects are introduced to the site with incoming waste, insecticides offering rapid and long-term treatment will be utilised and the offending waste promptly removed from site.

## 16.11 Litter

16.11.1 Any escape of litter will be controlled throughout the working day & cleared immediately on identification.

16.11.2 Operatives complete a final inspection around the site perimeter at the end of the working day and remove any fugitive material/debris found in the access road and/or operational areas.

# 17 Emergency Procedures

17.1.1 The following procedure applies to **All Emergencies**: -

1. A Responsible Person will take immediate control of any incident pending handover to the appropriate authority (if currently onsite).
2. As much information as possible will be gathered, including names & addresses of any bystanders, & photos taken as evidence if possible.
3. Appropriate personal protective equipment is to be used at all times (PPE is located within the Site Office).
4. Complete an Environmental Incident Record form as shown at Appendix EMS1.

## 17.2 Environmental Incident Record Form Procedure

1. Complete Environmental Incident Record Form as detailed at Appendix EMS1 in the event of any accident/incident with potential environmental implications.
2. Once investigations are complete any corrective action recommended is acted upon and recorded.
3. Once actioned, a copy of any completed form is held within the Site Office for at least three years.

# 18 Complaints Investigation Procedure

1. Complete a Complaints Record Form.
2. An investigation is undertaken to determine presence/absence, characteristic and intensity of the reported issue. The time of the complaint will be linked with site activities. Review the Site Dairy to determine if any abnormal site operations/conditions were present at the time of the complaint.
3. A Responsible Person will determine any appropriate action necessary to remedy/mitigate the cause(s) of the identified complaint.
4. Specialist advice will be sought if deemed necessary.
5. Any actions taken will be recorded in the Site Diary.
6. Written confirmation of any actual or potential pollution incidents must be submitted to the Environment Agency Permitting Officer within 24 hours of detection. (Information at front of document).
7. All complaint forms will be available for inspection by representatives of regulatory bodies.

# 19 Leakages or Spillages Procedure

19.1.1 On identification of a **Leak or Spillage** the following procedure is to be followed: -

1. Prevent unauthorised access to the affected area.
2. Prevent uncontrolled escape of potentially contaminating liquids using supply of absorbent materials to control the flow of liquids.
3. If safe to do so, isolate source of leak/spillage to prevent further losses, which may involve switching off a particular piece of machinery & deploying a containment vessel (i.e., drip trays) underneath the affected area.
4. If necessary, absorbents will be deployed.
5. If necessary, initiate controlled evacuation of the site.
6. All contaminated absorbents must be placed in a leak proof container, labelled & stored pending removal.
7. Seek specialist advice on decontamination of the site surfaces if necessary.
8. Complete an Environmental Incident Record Form (See Appendix EMS1).
9. Any action(s) taken will be recorded in the Site Diary.
10. Written confirmation of any actual or potential pollution incidents must be submitted to the Environment Agency via the Permitting Office within 24 hours. (Information at front of document).
11. Confirm site clean up with the Environment Agency. (Information at front of document).
12. Replenish supplies of absorbent materials.

# 20 Equipment & Machinery Malfunction & Failure Procedure

20.1.1 On identification of any Equipment or Machinery Malfunction or Failure the procedure to be followed is: -

1. Cease operations immediately & determine if continuation of use poses a significant risk to health or the environment.
2. If continuation poses a significant risk, switch off and isolate the affected piece of equipment.
3. Notify a Responsible Person who will instruct the appropriate maintenance personnel or external contractor to undertake necessary repairs.
4. Notify Environment Agency Permitting Officer if the malfunction or failure could cause pollutants to escape the permitted boundary. (Information at front of document).
5. Complete an Environmental Incident Record Form. (See Appendix EMS1).
6. Any action(s) taken will be recorded in the Site Diary.
7. Written confirmation of any actual or potential pollution incidents must be submitted to the Environment Agency via the Permitting Office within 24 hours. (Information at front of document).

## 21 Non-Conformance Procedure

1. Non-conformance identified.
2. A Non-Conformance Record form is completed (see Appendix EMS3).
3. A Responsible Person initiates an investigation of the non-conformance & ascertains potential impact(s) on the environment and how serious any potential effects could be.
4. Once the non-conformance has been assessed, action will be taken to remedy the cause.
5. All actions will be recorded in the Site Diary.
6. In the event of an emissions release that has caused, is causing or may cause significant pollution, the Environment Agency will be notified within 24 hours, advice taken, and action recorded in the Site Diary.

# 22 Periodic Review

22.1.1 The adequacy of this EMS will be reviewed in light of any non-conformance. If any amendments to the EMS are required, the Environment Agency will be provided with an updated version.

# Appendix EMS1: Environmental Incident Record Form

| | |
|---|---|
| Date & time of the incident | |
| What happened, what was it about? | |
| Was anyone else aware of this – other witnesses? If so, who? | |
| What caused it? | |
| What have you done to make sure that it does not happen again? | |
| Was there any **significant pollution** or **environmental damage** to land, water, or protected areas – for example: dust, odour or noise pollution outside the site or spillage of polluting liquids onto the ground, or at a site of special scientific interest, or into a drain or a watercourse? (If so, then complete an incident form)<br><br>Is there a continuing threat? Yes/No | |
| If there was (or still is), then you must take steps to prevent further damage and notify the Environment Agency on 0800 807 060 and any other relevant regulators ASAP. Have you done so? Yes / No | Who did you phone?<br><br>At what time did you phone? |
| You must also write or send an email to confirm this to the local office (see your accident management plan for the address) Have you done so? | Yes/No<br><br>What date did you contact? |
| Please print your name, date, and sign: | |

# Appendix EMS2: Complaint Record Form

| | |
|---|---|
| Who made the complaint? Name: | |
| Address | |
| Phone No | |
| Date and time they made the complaint | |
| What happened, what was it about? | |
| Was anyone else aware of this – other neighbours or your staff? If so, who? | |
| Did the complaint relate to your site? If so, what happened? What went wrong? | |
| What have you done to make sure that it does not happen again? | |
| Was there any **significant pollution** or **environmental damage** to land, water, or protected areas – for example: dust, odour or noise pollution outside the site or spillage of polluting liquids onto the ground, or at a site of special scientific interest, or into a drain or a watercourse? (If so, then complete an incident form) | |
| If there was, then you must take steps to prevent further damage and notify the Environment Agency on 0800 807 060 and any other relevant regulators ASAP. Have you done so? Yes / No | Who did you phone?<br>At what time did you phone? |
| You must also write or send an email to confirm this to the local office (see your accident management plan for the address) Have you done so? | Yes/No<br>What date did you contact? |
| Please print your name, date, and sign: | |

# Appendix EMS3: Non-Conformance Record Form

| | |
|---|---|
| Date and time non-conformance identified | |
| What happened, what was it about and what permit condition does it relate to? | |
| What caused it? i.e., what happened that should not have happened OR what didn't happen that should have? | |
| What has been done to make sure that it does not happen again? | |
| Has the site EMS been reviewed in light of the incident and have any changes to operations and procedures been rolled out in response? Include dates. | |
| Was there any significant pollution – for example: oil entering a surface water drain. If so, what? | |
| If there was then you must notify the Environment Agency on 0800 807060 ASAP. Have you done so? | Yes/No/not applicable.<br>Time:<br>Date:<br>EA. Incident number: |
| Print name, date, and sign | |

# Appendix EMS4: Environment Agency Notification Form

**Part A**

| **(a) Notification requirements for any malfunction, breakdown or failure of equipment or techniques, accident, or emission of a substance not controlled by an emission limit which has caused, is causing or may cause significant pollution** | |
|---|---|
| **To be notified within 24 hours of detection** | |
| Date and time of the event | |
| Reference or description of the location of the event | |
| Description of where any release into the environment took place | |
| Substance(s) potentially released | |
| Best estimate of the quantity or rate of release of substances | |
| Measures taken, or intended to be taken, to stop any emission | |
| Description of the failure or accident | |

| **(b) Notification requirements for the detection of any significant adverse environmental effect** | |
|---|---|
| **To be notified within 24 hours of detection** | |
| Description of where the effect on the environment was detected | |
| Substance(s) detected | |
| Concentrations of substances detected | |
| Date of monitoring/sampling | |

**Part B-to be submitted as soon as practicable.**

| | |
|---|---|
| Any further accurate information on the matters for notification under Part A | |
| Measures taken, or intended to be taken, to prevent a recurrence of the incident | |
| Measures taken, or intended to be taken, to rectify, limit or prevent any pollution of the environment which has been or may be caused by the emission | |
| The dates of any unauthorised emissions from the facility in the preceding 24 months | |
| Name* | |
| Post | |
| Signature | |
| Date | |

*Authorised to sign on behalf of operator

# Appendix EMS5: Accident Investigation Forms

**Site Details:**

| | |
|---|---|
| Date of Accident: | Time: |
| Site of Accident: | Site Manager/Supervisor at Time of Event: |

**The injured person (If required)**

| | |
|---|---|
| Name of Injured Person: | Date of Birth or Age: |
| Nature of Injuries: | Part of Body Injured (Tick as Appropriate) |
| | Hands, Wrists, Finger<br>Feet, Ankles, Toes<br>Legs, Knees, Hip, Thigh<br>Eyes<br>Head, Face, Neck<br>Torso<br>Back, Spine |
| First Aid Treatment: | |
| Hospital Treatment & Contact Address/Telephone: | |
| Follow Up Treatment (If Any) | |

**Details of Accident (Please Detail Location Onsite):**

| |
|---|
| |

**For Office Use Only:**

| | |
|---|---|
| Time Off Work (Seven Days RIDDOR): | |
| Recorded in Accident Logbook: Y/N | Accident Logbook Number: |
| RIDDOR Reportable: Y/N | RIDDOR Report Number: |
| Further Investigation Required: Y/N<br><br>Note: Use the accident log number for investigation. | |
| Distribution: Office/Site File/Client/Other (Please Specify) | |

| |
|---|
| Continuation box for any additional information or information not able to be entered in other boxes: |

| | |
|---|---|
| Print Name: | Date: |
| Position: | Signature: |

**Instructions for reporting accidents: -**

All work in the immediate area will cease and the working area is to be made safe.

In the event of an accident the extent of the injuries will be immediately assessed by the first aider: -

1. If the injuries sustained are of minor nature than the first aid provider will apply first aid to the injuries and make appropriate recommendations to the injured person.
2. If the injuries sustained are of a significant or serious nature, then the first aid provider will administer as much first aid as they are capable of/comfortable to deliver & make the injured person as comfortable as possible while the emergency services are contacted.

# Appendix EMS8: Site Infrastructure Plan

TBC

# Appendix EMS9: Climate Change Risk Assessment

| **Potential changing climate variable** | **A**<br>**Impact** | **B**<br>**Likelihood** | **C**<br>**Severity** | **D**<br>**Risk**<br>(B x C) | **E**<br>**Mitigation**<br>(What will you do to mitigate this risk) | **F**<br>**Likelihood**<br>(After mitigation) | **G**<br>**Severity**<br>(After mitigation) | **H**<br>**Residual risk**<br>(F x G) |
|---|---|---|---|---|---|---|---|---|
| 1. Summer daily maximum temperaturemay be around 7°C higher compared toaverage summer temperatures now. | There is the potential for increased temperatures for dust/odour increase from the drying of wastes. However, it is not expected that the activities onsite will give rise to significant dust/odour emissions due to the nature of the wastes handled. | 3 | 2 | 6 | Emissions mitigation measures already addressed within supporting documentation. Materials are removed on an ongoing basis, based on the maximum storage times specified within the Permit are not exceeded. Regular site cleaning and use of water provisions to keep temperatures down. Ensure water supplies are sufficient and potential for consideration around harvesting rainwater in winter months for use in summer. Consideration for the shading of electrical equipment is exposed to direct sun light. Ensure housekeeping arrangements are maintained to a good standard to prevent any vegetation growing around the site and wastes are contained within storage areas. Managing suitable segregation and separation of wastes. Regular inspection and preventative maintenance of the site, plant, or equipment. | 3 | 1 | 3 |

| | | | | | | | | |
|---|---|---|---|---|---|---|---|---|
| 2. Winter daily maximum temperature could be 4°C more than the current average, with the potential for more extreme temperatures, both warmer and colder than present. | No negative impact foreseen. | 3 | 2 | 6 | Emissions mitigation measures already addressed within supporting documentation. Materials are removed on an ongoing basis, based on the maximum storage times specified within the Permit are not exceeded | 3 | 1 | 3 |
| 3. The biggest rainfall events are up to 20% more intense than current extremes (peak rainfall intensity)*. | There is potential for an increase in surface water run off that would not cause disruption to operations. The increase in surface water could increase the number of times the interceptor is emptied during wetter periods. Potential for areas benefitting from hardstanding surface to pond if the surface cannot manage the amount of rainfall percolating through. | 3 | 2 | 6 | Increased monitoring of interceptor & drainage system during periods of wetter weather. Weather forecast to be monitored. Ensure drainage arrangements/systems are adequate and sufficient in the event of an increase in rainfall. Drainage systems are inspected and maintained as required. | 3 | 1 | 3 |
| 4. Average winter rainfall may increaseby 36% on today's averages. | There is potential for an increase in surface water run off that would not cause disruption to operations. The increase in surface water could increase the number of times the interceptor is emptied during wetter periods. Potential for areas benefitting from hardstanding surface to pond if the surface cannot manage the amount of rainfall percolating through. | 3 | 2 | 6 | Increased monitoring of interceptor & drainage system during periods of wetter weather. Weather forecast to be monitored. Ensure drainage arrangements/systems are adequate and sufficient in the event of an increase in rainfall. Drainage systems are inspected and maintained as required. | 3 | 1 | 3 |
| 5. Sea level could be as much as 0.6mhigher compared to today's level *. | No negative impact foreseen as the site is located inland. | 3 | 2 | 6 | Increased monitoring of interceptor & drainage system during periods of wetter weather. Weather forecast to be monitored. Ensure drainage arrangements/systems are adequate and sufficient in the event of an increase in rainfall. Drainage systems are inspected and | 1 | 1 | 1 |

| | | | | | | | | |
|---|---|---|---|---|---|---|---|---|
| | | | | | maintained as required. | | | |
| 6. Drier summers, potentially up to 42%less rain than now. | There is the potential for increased temperatures for dust/odour increase from the drying of wastes. However, it is not expected that the activities onsite will give rise to significant dust/odour emissions due to the nature of the wastes handled. | 3 | 2 | 6 | Emissions mitigation measures already addressed within supporting documentation. Materials are removed on an ongoing basis, based on the maximum storage times specified within the Permit are not exceeded. Review Environmental Risk Assessment Documentation. Regular inspection and preventative maintenance of the site, plant, or equipment. | 3 | 1 | 3 |
| 7. At its peak, the flow in watercourses could be 35% more than now, and at itsLutont it could be 75% less than now. | Low flow could potentially impact the mains water used onsite if there was a wider impact on the water supply network. | 3 | 2 | 6 | Increased monitoring of stockpiles & materials are removed on an ongoing basis, based on the maximum storage times specified within the Permit are not exceeded. Main's water supplies only used when necessary. | 3 | 1 | 3 |
| 8. Storms | Storms could see a change in frequency and intensity. The unique combination of increased wind speeds, increased rainfall, and lightning during these events provides the potential for more extreme storm impacts. | 3 | 2 | 6 | Increased monitoring of interceptor & drainage systems during periods of wetter weather and ongoing monitoring of infrastructure to ensure it is secure and suitable. Weather forecast to be monitored. Review structures and any vulnerabilities if weaknesses are highlighted. Regular inspection and preventative maintenance of the site, plant, or equipment. | 3 | 1 | 3 |