VEOLIA MINIMUM REQUIREMENTS

Going Beyond Legal Compliance

HOUSEHOLD WASTE RECYCLING CENTRE

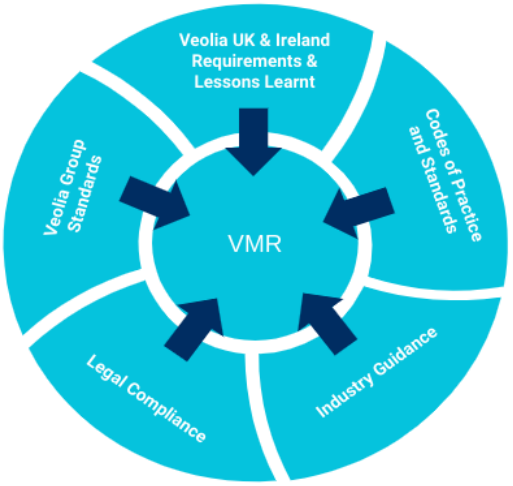
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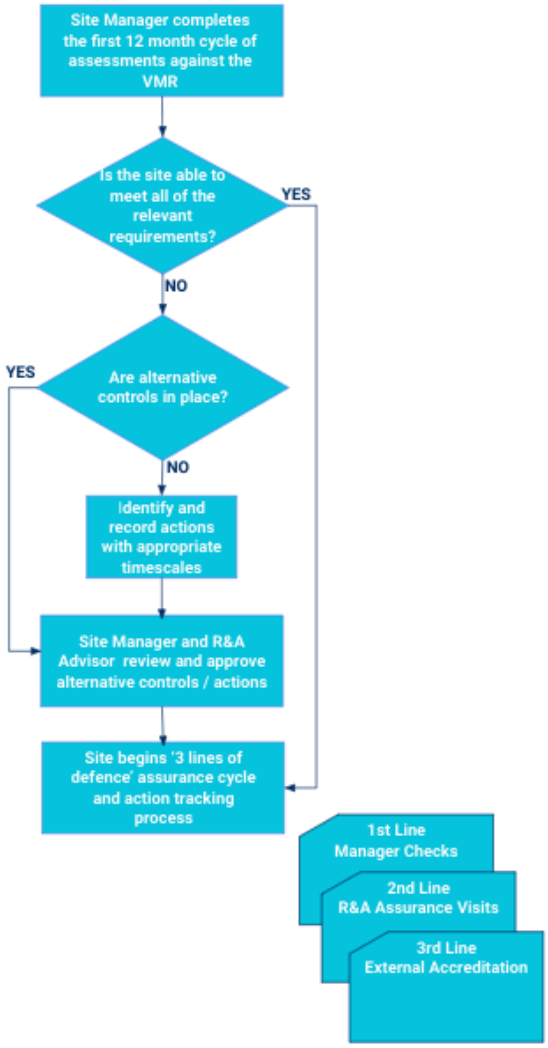
Purpose of the Document

The purpose of the *Veolia Minimum Requirements (VMRs)* is to help our operational managers understand what is needed at their particular operation/site. These requirements have been defined based on relevant legislation, the identification of key risks to be managed, and the application of lessons learned from across our UK and Ireland operational businesses.

The VMRs bring together all of the elements to manage key risks relating to Health & Safety, Quality, Environment, Security, and Insurance in one place. They are held on the company Veolia Management System (VMS) alongside any key procedures specific to the operation type. The VMRs will provide consistency across our operations and assurances to the site management that the key risks at the site are managed.



VMR Implementation Process



An assurance programme is in place to verify the implementation and controls of the VMR. The programme is a '3 lines of defence' approach

1st Line: Managers complete a self-check using a rolling checklist aligned with the relevant sections of the VMR. All sections are reviewed each year.

2nd Line: The Risk and Assurance team completes assurance visits to verify operations' adherence to the VMR requirements, manager self-checks, and improvement actions.

3rd Line: A programme of external audits is conducted annually; sampling several sites to verify compliance and effectiveness of the VMRs, VMS and our ISO certifications (9001, 14001, 45001, 22301).

Notes:

This document does not replace any specific requirements laid down in the site permit or planning approvals, nor any action plans in place with regulatory authorities. It is intended for application during normal operations. Any key changes including those made to plant or process, people, or procedures must follow a Management of Change (MOC) process with appropriate sign-off.

International Standards are referenced throughout the requirements. These are to be used as an assurance that products, parts, or services meet expected standards when procured from suppliers/contractors - these standards should be noted in associated documentation i.e. certificate of installation/conformity or similar.

Where construction work is undertaken then reference is to be made to the Construction VMR.

This document provides the minimum requirements for Veolia operated Haulage and Logistics (including Hazardous Waste) operations and is to be used in conjunction with the Core Content VMR and the HWRC tool kit.

Veolia's Life Saving Rules

Following detailed analysis of serious and fatal accidents across Veolia Group, 12 simple rules have been introduced, highlighting the highest risk situations linked to each of our High Risk Management Standards (HRMS). These "Life Saving Rules" (LSR) focus the attention of all employees on work practices and / or behaviours, which, if followed, will help to reduce and prevent these types of accidents from happening.

Life Saving Rules *are* ***simple to remember***, ***practical***, *and* ***easy to apply*** *to our activities. They are* ***applicable to everyone*** *and are* ***not to be ignored***.

They can save lives if they are always applied as a last barrier of protection. In Veolia UK&I, these Life-Saving Rules are incorporated into our Veolia Minimum Requirements (VMR).

For your business activity the relevant ***Life Saving Rules*** are:



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Further reading:

Household Waste Recycling Centres procedure

HSE Waste 26 Guidance

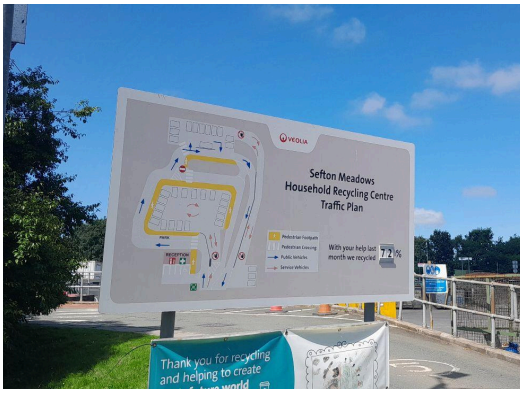
1. Waste Depositing





1.1 General requirements for all HWRC sites		*Links*
a	Automated External Defibrillator (AED) to be installed and maintained on site	AED Minimum Requirements
b	CCTV is installed in all public access areas	Use of CCTV
c	Site personnel are visible and available to direct MoPs to appropriate points on site	
d	Brush and pans for clean up are available in the area with designated storage area	
e	Good visibility is maintained through provision of adequate lighting, (minimum 50 lux)	
f	Manual handling aids are provided and assessed fit for purpose with weekly checks. Assessments for use and training is in place	
g	Clear approved signage of waste accepted using symbols at each deposit point	
h	Fully stocked spill kits are available, contents are checked weekly, and people on site are trained to use them	
i	No unauthorised totting is permitted by MoPs or employees and signage is place	
j	Tools / aids are available for safe retrieval of unintended items deposited in containers. Where access to the container is required, a procedure is in place to agree a safe method of access, which is reviewed by Risk & Assurance and approved by the Contract Manager prior to work commencing	
k	Suitable checks are carried out and recorded for contamination of skips (prevention where possible)	
l	Designated quarantine area for storage of non-conforming loads / wastes/ samples is established with signage and maintained. This can be flexible to fit in with operational requirements unless size is specified in a site specific FPP	

1. Waste Depositing

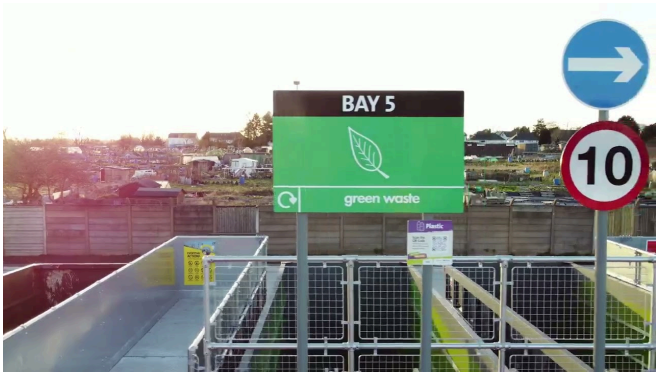




1.2 Managing vehicles and pedestrians		*Links*
m	Vehicles and pedestrians are segregated by designated parking / paths and drop off points	
n	Clear and easy to read signage is displayed at site entrances to assist members of the public to follow the correct traffic routes (i.e. signs, road markings). On larger sites where there are known issues with high volumes of traffic arriving at site (queuing) a site route plan is displayed	
o	There are clearly marked parking bays for off-loading	
p	Measures are in place to prevent overhang of vehicles on walkways for reversing cars following risk assessment	
q	A reverse only or drive through (parallel parking) policy for loading bays is in place with clear signage	
r	Sites are to prevent reversing across sites (e.g. from bay to bay, or side to side of location)	
s	Locations are to prevent all vehicles from reversing off site once materials have been deposited into the correct containers. All vehicles leaving site must be driven off site forwards facing	
t	There is signage detailing: wear seatbelts, children and pets to be kept in the vehicle, turn engines off, put handbrake on, wear appropriate footwear, report all accidents to site staff and ask for assistance if required	
u	Walkways are maintained to prevent slips, trips and falls	
v	Uneven ground, raised curbs / steps are highlighted	

1. Waste Depositing





1.3 Single level sites		*Links*
w	Gantry steps are of suitable construction and non-slip material with risers fitted between treads, high visibility edges and risers (of different colours), and broad tread	
x	Safe means of moving steps are identified and used. For steps <50kg this can be 2 person lift or mechanical means. For steps weighing >50kg this is by mechanical means or wheels	
y	Handrails are fitted to steps with clear "use hand rails provided" signage in place	
z	Daily inspections of gantries and steps are carried out and recorded	HWRC Daily Site Inspection Checklist
aa	Annual maintenance programme is in place for all gantries in operation	

1.4 Split level sites		*Links*
bb	Gantries are kept clear of trip hazards and no waste stored on them	
cc	Railings / fencing are maintained in good condition and inspected daily	
dd	Access is prevented to gantries during container servicing using gates / chains	
ee	Secured access to lower yard	

2. Waste Management and Storage





2.1 Gas cylinders & aerosols		*Links*
a	Cylinders are clearly labelled, stored upright and in a single layer, in fully enclosed cages or solid containers which are lockable	Gas Cylinder Storage
b	Flammable cylinders are segregated from oxidising / toxic materials by at least 3m / firewall and a minimum of 6m from potential ignition sources and 3m from site boundary	
c	Aerosols are stored in a ventilated container that is out of direct sunlight with warning signs (no smoking / naked flames) and segregated from flammable waste and ignition sources	

2.2 Batteries		*Links*
d	Vehicle batteries are stored in plastic, ventilated containers with lids, labelled ‘corrosive and vehicle batteries only’ at least 6m from flammable storage area	
e	Domestic batteries are stored in a plastic, lidded and ventilated container with labelling ‘dry batteries only’ and kept a minimum of 3m away from vehicle battery storage	
f	Large domestic batteries (e.g. from battery powered garden tools) and small domestic batteries (e.g. AA, AAA etc.) are stored separately	
g	A local instruction is in place for dealing with lithium battery fires to include: ○ Identification of battery fire risk areas ○ Provision of long handled tools and metal containers with sand or vermiculite to recover batteries in risk areas ○ 1.5m exclusion zone to be implemented around battery in the metal container ○ Observation of battery until smoldering, fire/explosion has ceased for more than 30 minutes ○ After 30 minutes remove the battery from the area and maintain a 30 minute fire watch	Lithium battery fires

2. Waste Management and Storage





2.3 Asbestos		*Links*
h	HWRC staff are trained in asbestos awareness (recognition, handling & storage). Relevant RPE and PPE is available and worn with with trained personnel face fit tested within the last 2 years	
i	Asbestos is double wrapped before acceptance and stored in fully enclosed lockable container and labelled e.g. ‘asbestos cement waste only’, ‘warning contains asbestos’	
j	If an emergency situation arises for dealing with asbestos, (fly-tipped, or placed in containers on site), sites’ local emergency plans are implemented, including quarantining the area and seeking advice from the local Risk and Assurance team on how to proceed	
k	A hose with sprinkler head and water source is available for dampening down	

2.4 Other Waste		*Links*
l	Paints and adhesives are stored in weatherproof, bunded and ventilated containers which are protected from water ingress (e.g. undercover). Containers are labelled indicating contents and ‘flammable no naked flames’, and positioned a minimum of 6m from flammable cylinders and battery containers	
m	Hazardous chemicals are stored in locked containers with bunding, ventilation, and 3m from toxic waste. Household chemicals are in closed lid containers. All items are recorded and record maintained	
n	Fluorescent / cathode ray tubes must be stored in closed lid containers	
o	Small and large WEEE is stored separately in designated containers on an impermeable surface	
p	Gypsum is to be stored in weatherproof containers	

3. Compaction





3.1 General		*Links*
a	Controls are in place to ensure site operatives and members of the public cannot access the operational area during compaction using measures such as full site or partial (barriered) closures	
b	Radio communications are in place between all site staff to control traffic e.g. weighbridge/control room/ site operative and mobile plant operator	Workplace Transport Risk Assessment
c	All mobile plant is fitted with reversing cameras, audible reversing alarm and beacon lights	Mobile Plant
d	Pre-use checks are completed and recorded for all Mobile plant	Mobile Plant: pre-use checks
e	Weekly vehicle cleaning is in place and includes radiators and exhausts with training in place for those completing the task	
f	Windscreen and side protection are in place on all mobile plant	
g	Controls are in place to protect people and vehicles against projectiles e.g. debris netting	
h	Overhead obstructions are highlighted and signage is in place	
i	Local written work instructions are required on site for the activities identified	

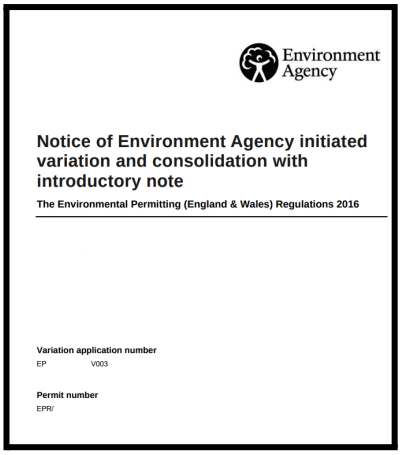
4. Container and Bin Servicing





4.1 General		*Links*
a	Site route plan for operational vehicles is clearly displayed with signage prohibiting MoPs access	
b	There is a designated area in place for safe completion of the bin servicing. Vehicles and pedestrians are segregated e.g. site closure or barriers	
c	A safe system of work is in place to prevent uneven or overfilling of containers / skips (e.g. regular compaction or emptying)	
d	Bale deflector bars are fitted to all containers	
e	Operations are supervised at all times by site personnel	
f	Posts or sleepers are used as a backstop to prevent damage to infrastructure	
g	A housekeeping regime is in place prior to bins being replaced	
h	Site staff make sure that all loads are sheeted by the driver, in a safe area, before leaving site	
i	Sheeting is done using an automated sheeting system on vehicles. Where this is not available sheeting of containers takes place from ground level	
j	Full and accurate completion of waste paperwork transfer / consignment notes is completed with paperwork kept at site according to local procedure	
k	Visual daily inspection of containers are completed, any defects or contamination are reported and recorded	
l	A process is in place to manage overweight vehicles including notification to the driver and Site Manager. No overweight vehicles are allowed to leave the site	
m	Local written work instructions are in place for any specific container and bin servicing activities which are specific to site	
n	Entering and exiting is controlled with no reversing out of the area and site	

5. Environmental Permits and Licences

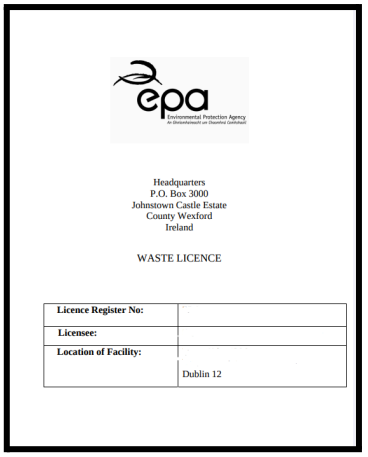

Environment Agency

Notice of Environment Agency initiated variation and consolidation with introductory note

The Environmental Permitting (England & Wales) Regulations 2016

Variation application number
EP V003

Permit number
EPR/


epa
Environmental Protection Agency

Headquarters
P.O. Box 3000
Johnstown Castle Estate
County Wexford
Ireland

WASTE LICENCE

Licence Register No:	
Licensee:	
Location of Facility:	Dublin 12

5.1 General		*Links*
a	Veolia adheres to all permit requirements, documenting site specific details in the counterpart template. Current permits, previous variations, and registered exemptions are available	Permitting and Other Statutory Environmental Licences Environmental Permit Counterpart Guidance Counterpart Template
b	Employees complete Competence Management System (CMS) training or a holder of a Certificate of Technical Competence (CoTC) is assigned, attending for the required hours and maintaining competency through ongoing training and records	Environmental Technical Competence Technical Competence Matrix
c	A permit review is completed on EcoOnline (AVA) every 12 months and the Permitting Master Records List is kept up to date	Permitting Master Records EcoOnline AVA
d	Only waste/material listed on the permit is accepted onto site	
e	Summary of waste movements (Waste Returns- including MF, Consignee and WEEE) are submitted to the relevant regulator (where permit / licence dictates) in line with specified timeframes. These are submitted by a nominated person (with cover in place for holidays and absence) and exclude any waste accepted under exemption	
f	Where combustible waste/material is stored, a documented fire prevention plan is in place, available on site and reviewed annually as a minimum	
g	A climate change survey is completed and reviewed annually with any actions recorded on EcoOnline AVA (Permitted sites in England only)	Climate Change Survey EcoOnline AVA



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