

ENVIRONMENTAL MANAGEMENT SYSTEM

ENVEO ASTON Ltd

Corbet Arms, High Street, Market Drayton, TF9 1PY

Site: Unit 15, Clwyd Close, Hawarden Industrial Estate, CH5 3NU



Version 1.0

March 2024

The current version of the Environmental Management System (EMS) is preliminary and the final version will be further developed after the Waste Operation Permit issue.

1. PURPOSE

The ENVIRONMENTAL MANAGEMENT SYSTEM (EMS) determines the way of management, structuring and use of the procedures, instructions and records, as well as the rules for the distribution, control, storage and withdrawal of invalid documentation. These documents become mandatory after their approval by the Management of the Company.

The purpose of this procedure is to ensure that the personnel using the documents related to the conditions of the Waste Operation Permit have easy and quick access to the most current editions of these documents and to the management of the document control process.

This document sets out how the Company will manage the acceptance, loading/unloading and storage of collected waste oil, including control of relevant waste documentation:

- address the risks and opportunities associated with the waste aspect;
- outlines how waste documentation is stored and maintained;
- outlines the storage and transfer of waste to authorise person/businesses
- without harming the environment
- describes the compliance with relevant environmental legislation

2. DEFINITIONS

EMS - Environmental Management System

Procedure - The procedure is a document that defines the structure, responsibilities, scope and mechanism of environmental management activities.

Instruction - The instruction is a document that represents a sequence of rules and actions for the implementation of certain activities.

Record – A record keeping document. It is linked to a relevant procedure, instruction or is an independent document.

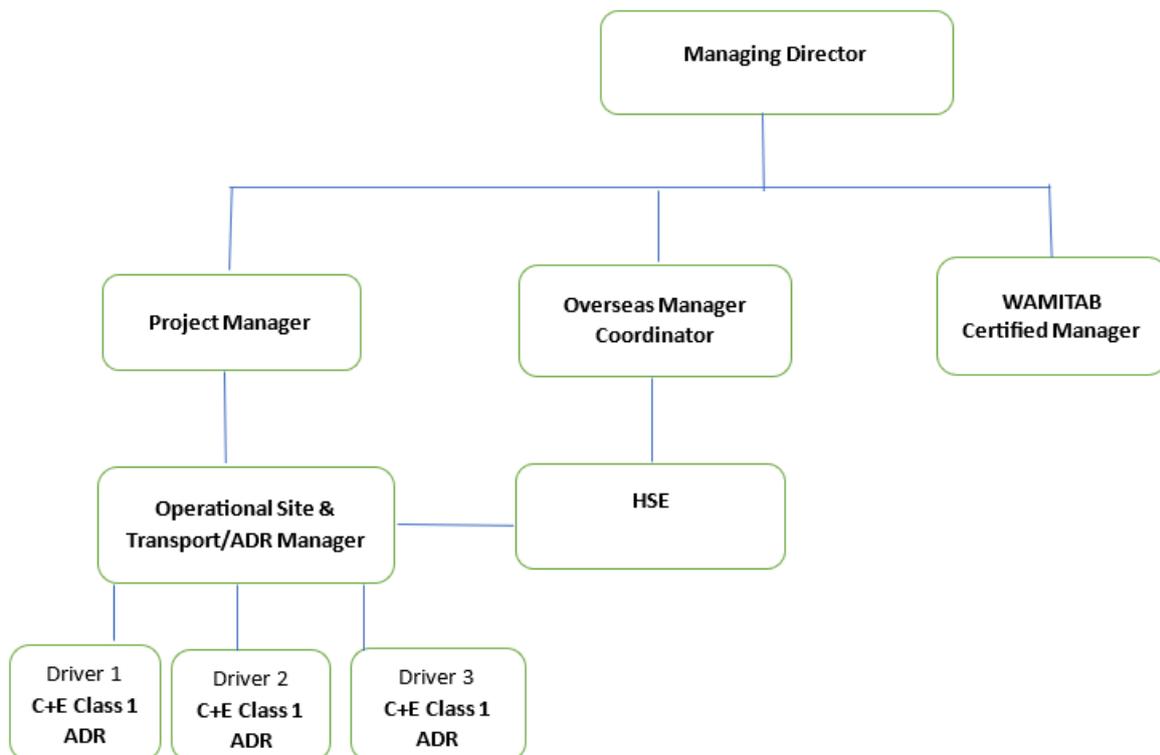
3. RESPONSIBILITIES AND ORGANISATIONAL CHART

3.1. Company Environmental Policy

Environmental protection is carried out by reducing the use of natural resources, reducing harmful emissions and introducing environmentally cleaner technologies, which is incorporated in the policy of ENVEO ASTON Ltd. The company applies clear principles that include:

- Identification of the significant environmental aspects and impacts of the activity of ENVEO ASTON Ltd., development of programs with appropriate measures for their control;
- The Company has an established environmental policy, which expresses its desire to build a systematic approach to environmental protection by reducing the use of natural resources, reducing harmful emissions from its activities, implementing modern waste management methods.
- Use of modern equipment and facilities meeting the requirements of the Best Available Techniques (BAT) and good global practices.
- Preventing and reducing the possibilities of emergency situations and implementing the Risk Assessment Plan.

3.2. Organisational Chart



3.3. Environmental Management System

The environmental management is directly related to the activity and is aimed at maintaining serviceable equipment operating under optimal technological and energy mode, ensuring rhythmic and qualified operation in accordance with environmental protection requirements.

A procedure has been developed for the regular training of personnel on environmental protection and occupational safety. According to this procedure, an annual training program for periodic professional training is prepared, the training needs are determined and the relevant programs are drawn up.

The Company applies an instruction for updating the documents in case of changes in the regulations, the work and the management of the activities on the territory of the site, and also in case of withdrawal of the invalid documentation.

Instructions for the operation and maintenance of the facilities have been developed and are being implemented. These written instructions are kept on site and are made available to the competent authorities upon request.

3.4. Reporting

The Operator shall send all reports and notifications required by the Waste Operation Permit to the relevant competent authority using the given contact details.

3.5. Best Management Practices

The Company, fulfilling the principles laid down in the environmental policy applies the following practices in its activity:

- constantly monitors the world practice in the industry and the development of technologies;
- conducts staff training on environmental issues;
- improves the working environment;
- follows the principles of the circular economy in compliance with the waste management hierarchy;
- complies with the environmental policy of the United Kingdom.

4. RELATED DOCUMENTS

The environmental management system includes the following documents:

4.1. Procedures

- ✓ **EA-P 01** Environmental training
- ✓ **EA-P 02** Information exchange
- ✓ **EA-P 03** Recording
- ✓ **EA-P 04** Documents management
- ✓ **EA-P 05** Waste oil pre-acceptance procedure
- ✓ **EA-P 06** Waste oil acceptance procedure
- ✓ **EA-P 07** Waste oil rejection procedure
- ✓ **EA-P 08** Waste oil storage procedure

4.2. Instructions

- ✓ **EA-I 01** Instruction for operation and maintenance of equipment, including pipelines, tanks and bunds.
- ✓ **EA-I 02** Maintenance instructions for the site plumbing system.
- ✓ **EA-I 03** Instruction for maintenance of the site power supply network.
- ✓ **EA-I 04** Instruction for periodic inspection and maintenance of the condition of the sewage system at the site.
- ✓ **EA-I 05** Instruction for actions when loading/unloading waste oil.
- ✓ **EA-I 06** Guidance on monitoring equivalent noise levels and total sound power levels.
- ✓ **EA-I 07** Instruction for periodic compliance assessment of the quantities of generated waste.
- ✓ **EA-I 08** Instruction for periodic compliance assessment of the collection, transportation and temporary storage of waste oil.
- ✓ **EA-I 09** Instruction for periodic compliance assessment of emission values and technical indicators.
- ✓ **EA-I 10** Instruction for establishing the reasons for the established non-compliances and taking corrective actions.
- ✓ **EA-I 11** Instruction for detecting and removing leaks from pipelines, tanks or bunds for waste oil.
- ✓ **EA-I 12** Instruction for removing spills.
- ✓ **EA-I 13** Instruction for periodic compliance assessment with measures against fugitive emissions.

- ✓ **EA-I 14** Instruction for periodic compliance assessment with measures to prevent/reduce emissions of odorous substances.
- ✓ **EA-I 15** Instruction for actions in the event of disasters and accidents.
- ✓ **EA-I 16** Instruction for actions in the event of spillage.
- ✓ **EA-I 17** Instruction for actions in the event of failure of equipment.
- ✓ **EA-I 18** Instruction for actions in the event of fire.

4.3. Records

EMS includes logs and documents which keep records, generated in the process of carrying out the activities, by responsible persons in order to adequately manage the processes and ensure traceability and opportunities for their analysis.

- ✓ **EA-R 01** Annual amount of accepted waste oil.
- ✓ **EA-R 02** List of personnel to carry out specific activities in fulfilment of the conditions in the Waste Permit
- ✓ **EA-R 03-01** Annual Training Plan
- ✓ **EA-R 03-02** Training Attendance Records
- ✓ **EA-R 04** List of the relevant legislative acts
- ✓ **EA-R 05** Documents register
- ✓ **EA-R 06** List of possible emergency situations with an impact on the environment and human health
- ✓ **EA-R 07** Accident register
- ✓ **EA-R 08** Inspection of the accident and appointment of corrective actions
- ✓ **EA-R 09** List of personal protective equipment
- ✓ **EA-R 10** Inspection of personal protective equipment
- ✓ **EA-R 11** List of countermeasures in the event of an accident
- ✓ **EA-R 12** Inspection of the means for countermeasures in case of accidents
- ✓ **EA-R 13** List of personnel responsible for actions provided for in the emergency plan
- ✓ **EA-R 14** Records of the inspection of the readiness of the personnel to act in case of accidents
- ✓ **EA-R 15** List of authorities/persons to be notified in the event of an accident
- ✓ **EA-R 16** Non-compliance register
- ✓ **EA-R 17** Corrective actions register
- ✓ **EA-R 18** Inspection of the water supply network

- ✓ **EA-R 19** Inspection of the sewage system and oil-water separator
- ✓ **EA-R 20** Inspection of pipelines, tanks and bunds
- ✓ **EA-R 21** Register of sources of fugitive emissions and odours and verification of measures to limit fugitive emissions from these sources
- ✓ **EA-R 22** Complaints Register
- ✓ **EA-R 23** Waste oil pre-acceptance checklist
- ✓ **EA-R 24** Emergency Situation Register

4.4. Other

- ✓ **EA-AMP** Accidents Management Plan
- ✓ **EA-PPM** Planned Preventative Maintenance
- ✓ **EA-SCP** Site Closure Plan
- ✓ **EA-SSP** Site Security

5. PROCESS

5.1. Description of the technological process

The activities that will be done on site include loading/unloading and storage of waste oils (R 13).

The oils will be collected mostly from garages and will be transported to the site using specialized trucks.

The collected waste oils will be unloaded and stored in two fixed closed tank containers with a total capacity of 48 tonnes (24 tonnes each). The tanks will be positioned on an impermeable surface within a bunded area having a sufficient volume as required by the legislative requirements. The total annual throughput will be 3'000 tonnes per year.

The collected oils from the site will be dispatched to external refineries for further recovery operations (R 9). No treatment of the waste will be performed on site.

The activity of receiving and dispatching used oils will proceed as is shown on fig.1. At the arrival of a waste oil loaded truck, it will enter the site and stop at the loading / unloading area (6). The unloading process will be accomplished through an electrical pumps coupled to the stationary tank containers. The pump will be situated within the bunded area thus safeguarding the site against leakages. There will be a special hose attached to the pump benefiting from a protective cap. The hose will be fastened to the truck and the unloading operation will commence.

When a minimum of 24 tonnes of waste oil are collected in the stationary tank containers another tank container will be positioned on a truck with semitrailer and parked at the loading / unloading area (6).

The special hose will be coupled with the valve of the tank container and the loading operation will commence after reversing the pump flow.

Having been fully loaded this truck will be dispatched to a chosen external refinery.

Any unlikely leakage inside the bunded area will be treated with adsorbents which will later be handed over to a licensed collector.

There will be an oil-water separator operating on site. It is designated by position 5, presented on fig.1 below. This existing structure has dimensions of 4 x 5 x 1.40 meters and is executed with reinforced concrete walls and foundation, which will be completely proofed with specialised impermeable coating, resistant to water and oil. The total volume of the structure is 28 m³. The separator is covered by a rigid hood, protecting it against rainfall. The separator is equipped with a pump, level indicator and inspection points. The oil-water separator is connected to the loading area (6) with a pipe (4) for receiving any contingent spills during the loading/unloading activities and/or ingress of rainwater. The level indicator of the separator will be visually monitored by the responsible person, at regular intervals, as set by the operating procedures. When a set level of the liquid is reached, the fitted pump will be used to empty the separated oil into an IBC container, which will, in turn, be emptied into the stationary tank containers. For the discharge and treatment of the leftover contaminated water, the service of an authorised company will be used. The regular maintenance of the oil-water separator will be performed every two years. The reservoir will be completely emptied

and the wall and foundation will be cleaned from all residue and sludge. A visual inspection of the condition of the coating will be performed and, if necessary, corrective action will be taken.

Any leakage in the loading / unloading area (6) will be directed to the oil-water separator (5) with the help of a raised concrete guard curb (2), a ditch (3) and an underground pipe (4).

Rainwater from the loading / unloading area (6), possibly oil contaminated, may discharge into the oil-water separator (5). The emulsion formulated this way will be gravitationally separated into two layers: oil (top) and water (bottom). The oil layer will be periodically pumped towards the stationary tank containers. The residual contaminated water and emulsion will be sent to licenced processors for regeneration/disposal. No wastewater will be discharged into sewage system or in water body.

The rainwater within the bunded area with the stationary tank containers will remain there until self-evaporation.

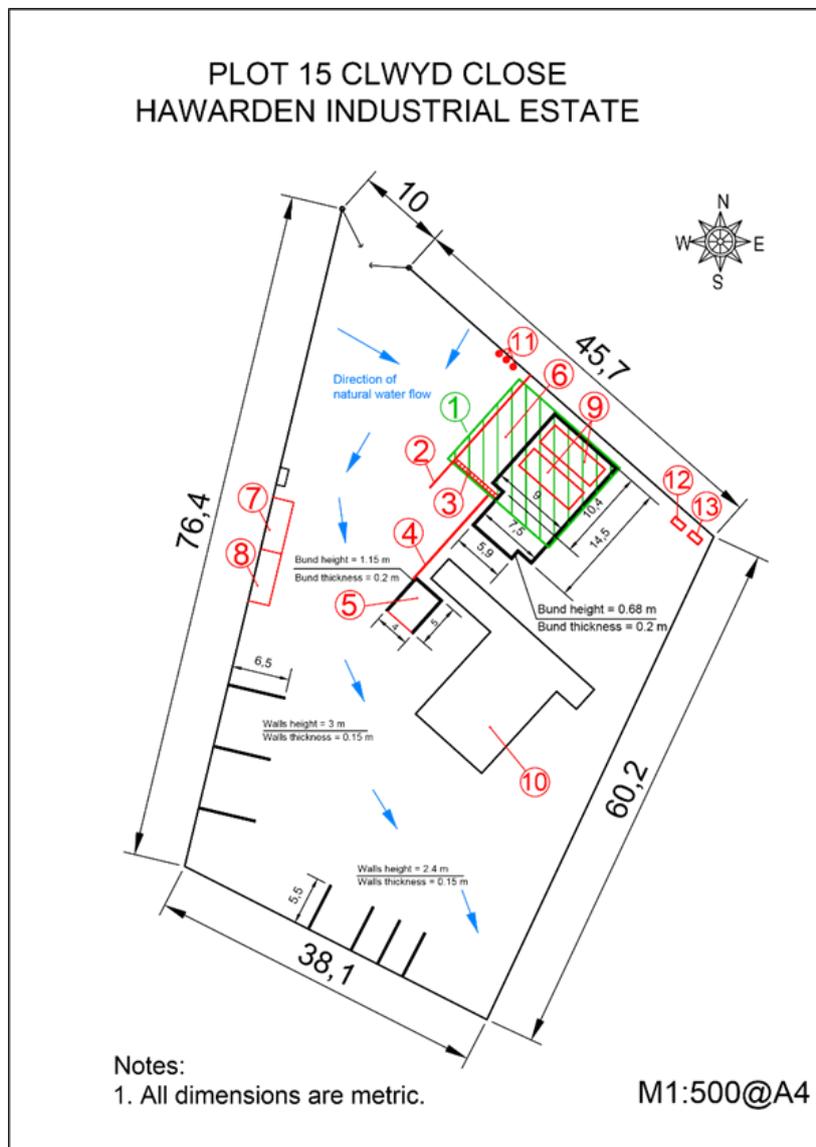


Fig.1

LEGEND:

1. Area of loading/unloading and storage of waste oil
2. Raised concrete curb to trap and direct the surface water flow to ditch, position 3
3. Ditch with grid cover
4. Underground pipe connecting the ditch with an oil-water separator, position 5
5. Oil-water separator
6. Loading / unloading area
7. Office container
8. Office container
9. Two tank containers for waste oil storage.
10. Unused existing ramp.
11. Fire Extinguishers class B
12. Box for pristine sorbents
13. Box for contaminated sorbents

ENVEO ASTON Ltd. is a holder of a Vehicle Operator License (OG2066177) and is registered as an Upper Tier Carrier, Broker, Dealer (CBDU463205).

5.2. List of accepted waste codes and names

Waste Code	Waste name
12 01 07*	mineral-based machining oils free of halogens (except emulsions and solutions)
12 01 10*	synthetic machining oils
13 01 10*	mineral based non-chlorinated hydraulic oils
13 01 11*	synthetic hydraulic oils
13 01 13*	other hydraulic oils
13 02 05*	mineral-based non-chlorinated engine, gear and lubricating oils
13 02 06*	synthetic engine, gear and lubricating oils
13 02 08*	other engine, gear and lubricating oils
13 03 07*	mineral-based non-chlorinated insulating and heat transmission oils
13 03 08*	synthetic insulating and heat transmission oils
13 03 10*	other insulating and heat transmission oils
13 04 01*	bilge oils from inland navigation
13 04 02*	bilge oils from jetty sewers
13 04 03*	bilge oils from other navigation
13 05 06*	oil from oil/water separators
13 07 01*	fuel oil and diesel
13 07 03*	other fuels (including mixtures)
16 07 08*	wastes containing oil
19 02 07*	oil and concentrates from separation

5.3. Transfer of Waste: Transfer and Consignment Notes

All waste movements must be recorded on a Hazardous Waste Consignment Note.

All Hazardous Waste Consignment Notes (HWCN) must be retained for three years and include the following information:

- Part A – Notification details.
- Part B - A written description of the waste, including a SIC Code for the process giving rise to the waste; the 6 digit European Waste Catalogue (EWC) Code (see Chapter 5.2); storage; waste quantity, etc;
- Part C – Carrier’s certificate.
- Part D – Consignor’s certificate
- Part E - Consignee Certificate

Source:

https://assets.publishing.service.gov.uk/media/5a8152a140f0b62302696ae4/LIT_6872.pdf

6. EMS REQUIREMENTS

All elements of the EMS should come under review to ensure that any amendments required in order to keep the policy up-to-date with constantly changing legal and policy requirements, contractual obligations and sector guidance are addressed within the scope of the EMS.

All EMS reviews should be formally documented and retained on file for future reference.

Any alterations or amendments to the EMS identified as required during the annual review must be communicated to all staff, contractors and the Natural Resources Wales (NRW) where applicable.

An annual management review will also take place with Senior Managers to review the suitability, effectiveness and continuity of the environmental manual. The following will also be included as part of the agenda items:

- Results of internal audits
- Communication with external parties (e.g. regulators), including complaints
- Environmental performance of the company
- Objectives and targets and whether they have been achieved
- Status of corrective and preventative actions
- Changing circumstances
- Accidents and incidents
- Improvements to site
- Compliance with environmental permit

7. REVISION HISTORY

Version	Date	Changes
1.0	18/03/2024	First issue