

Reference	SOP 08
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1. Purpose

To ensure that all activities on Haz Waste sites will be carried out in accordance with the environmental permit conditions. Activities will be managed and operated in accordance with a management system which identifies and minimises risks of pollution arising from operations, maintenance activities, accidents or incidents and non-conformances.

2. Scope

This procedure applies to all Hazardous Waste operational sites.

3. Framework

The Senior Management Team (SMT) will maintain a management systems plan SSI/631/600, which will list all registered, participating sites and activities and be updated annually. This plan will include a list of relevant procedures that form part of the Integrated Management System. The plan will also record the divisional management structure and organisation chart, updated annually.

The SHEQ Systems Manager will maintain a list of relevant legislation.

4. Aspects register and Objectives and Targets

The Site Manager will produce a site specific aspects and impacts registers on form QF659/08/01.

The evaluation should be carried out using the criteria noted on the form to identify environmental aspects arising from activities carried out on site to the following receptors:-

- Air
- Water
- Land
- Waste Produced
- Use of raw materials
- Local issues

The evaluation should consider aspects during both normal and non-routine operations.

5. Objectives and Targets

The Senior Management Team (SMT) will hold an annual review which will consider environmental, quality and safety performance and produce annual objectives and targets based upon key divisional issues identified by complaints, non conformance, accidents & incidents, regulatory notifications, audits and the aspects register.

The Hazardous Waste (HW) divisional objectives and targets will include the requirement for setting at least 1 site specific target at each site and will be recorded on form QF659/08. Site specific objectives and targets will be agreed by SMT and Site Manager (SM) and recorded on the same form.

6. Communication and Review

The SMT will hold an annual review which will discuss performance on last year's objectives and targets. The review will also consider objectives and targets for the coming year. The review will be minuted to enable presentation to all site staff.

The SM will hold a quarterly local review. The review will consider progress towards objectives and targets, inclusive of quality and safety objectives & targets where applicable. The review shall also consider any audit findings, complaints, Non-conformances, legislation updates, training requirements, contractor and supplier performance. Minutes and actions are to be recorded.

The SM will ensure that all site staff are aware of Environmental, Quality and H&S objectives and targets and site staff are updated on progress towards them.

7. Emergency preparedness

The SMT will ensure that each site implements and maintains an Incident/Emergency Management Plan. The plan should identify potential emergency situations and outline an action plan to manage the situation including an up to date contact list and schematic layout of the site.

Plans are to be agreed with the SHEQ coach and the SM will ensure that it is easily accessible and all requirements are communicated to site staff.

The plan should give guidance on:-

- Accidents and 1st aid
- Site evacuation procedures
- Fires
- Waste spillage or leakage
- Incidents on site eg adverse reaction
- Heavy rain & Flooding

The SM will ensure that key personnel are trained with the necessary skills to meet the requirements of the emergency plan.

Any equipment eg fire extinguishers or alarms, held specifically to deal with emergencies must be fully tested for functionality and records of inspections maintained.

8. Evaluation of suppliers

The SM will assess their environmental, safety and quality credentials of their suppliers. Typically, suppliers will be requested for details of any Environmental Permits, EQH&S policies and management systems accreditations where applicable. Major suppliers will be assessed by the central procurement team.

For suppliers of Waste Management Services, involving the transfer of waste, the suppliers may be subject to a compliance audit from Biffa staff to satisfy our obligations under DOC.

Ongoing contractor and supplier performance is discussed at daily production meetings and quarterly reviews

9. Auditing and Inspections

The SHEQ Systems Manager will maintain a schedule of external audits. Internal audits will be completed by the SHEQ department and recorded on the internal intranet Obi.

Following EA inspections details of CAR reports, including CCS scores are immediately uploaded onto BiffaNet by the SM or a delegated person. Any significant environmental issues are reported to the SMT, SHEQ and Group Environment Manager.

The SMT/SM will action any items raised through CAR's or as part of an improvement programme within a timescale agreed by the relevant regulatory authority (RRA). Completion of the requirement will be by written agreement with the RRA.

10. Environmental Permits

The SM will ensure that:-

Only waste of the type and quantity listed in the permit can be accepted on site, unless subject to another authorisation.

The waste must be processed in accordance with the operating techniques for specified activities and quantities listed in the permit.

A 'technically competent manager' is present for the required attendance period.

Adequate security measures are in place to prevent unauthorised access to the site.

Appropriate measures are taken to ensure the efficient use of energy and raw materials and ensure that operational activities have a minimal impact on the environment in accordance with Waste hierarchy (avoid/recover/recycle etc) principles.

11. Records & reporting

The site will keep records of all waste received and transferred offsite. A summary report of all waste types and quantities will be made for each quarter and submitted to the RRA within a month of the end of the reporting quarter.

Quarterly returns of all types and quantities of Hazardous waste received on site will be reported within a month of the end of the reporting quarter.

The SM will ensure that where required by the site permit and in a form and time agreed by the RRA, report:-

- The results of any emissions monitoring required by the site.
- Any production and performance data as specified in the site permit.
- A summary progress report of management system targets & objectives will be submitted to the RRA on an annual basis.

Complaints from the general public, authorities and customers are immediately recorded either on the compliance database or IRS database depending on their nature and dealt with accordingly.

Schedule 6 notifications are submitted to the EA in accordance with the Site Permit following senior management approval.

12. Emissions & Monitoring

The SM will implement measures to prevent the release of fugitive emissions of substances. A monitoring programme is to be established for areas of sites identified as potential sources of environmental release. Results from this monitoring will be used to calculate annual mass emissions and reported to the RRA annually as part of the site Pollution Inventory Report. Operational activities must also be free of odour and noise at levels likely to cause a nuisance.

Sites with identified point source emissions for air, water or land will implement a monitoring programme to ensure that any emissions do not exceed the specified limits.

The results from this monitoring will be reported on a frequency and format agreed with the RRA.