



Copart UK Ltd  
Environmental Management System (EMS)  
ISO 14001:2015

**Chester – 405**

Prince William Avenue  
Sandycroft  
Chester  
CH5 2QZ

**EAWML 37210**

| Revision | Date       | Version No | Reason for amendment | Updated by | Signature                                                                            |
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| N/A      | 09/11/2020 | 1          | Document Creation    | RD Woolley |  |
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## **1.0 INTRODUCTION**

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This document, comprising a Site Specific Environmental Management system (EMS) has been prepared by Richard Woolley, the Environment & Risk Manager representing Copart UK Limited in accordance with the Environmental Permitting Regulations and sets out the considerations and operational details that are relevant to the operation of the Authorised Treatment Facility (ELV) facility for Copart UK Limited at Prince William Avenue, Chester. It details the nature of the site, relevant site and infrastructure works, methods of operation and environmental controls. The Working Plan relates to the storage of End of Life Vehicles.

The site is permitted to store ELVs under waste management Licence EAWML 37210.

ELV depollution and dismantling will be undertaken in accordance with the minimum technical requirements for the treatment of end of life vehicles as set out in Annex 1 (3) of the End of Life Vehicles Directive (2000/53/EC).

The permit requires that the operator manages and operates the activity in accordance with a written Management System that identifies and minimises risks of pollution including those arising from operations, maintenance, accidents, incidents, non-conformances, closure and those drawn to the attention as a result of complaints; and using sufficient competent person and resources.

Additionally, the Regulatory Body has published Environmental Permitting Guidance to help Operators understand the conditions or rules of the Permit.

This EMS is written in accordance with Natural Resources Wales guidance;

### **1.1 Site Location & Description**

Copart UK Limited  
Prince William Avenue  
Sandyacre  
Chester  
CH5 2QZ

### **1.2 Operational Location**

Site Grid Reference: Easting 334224, Northing 367109

### **1.3 Site Description**

The Prince William Avenue site is located within a large industrial area to the West of Chester. The site is bordered by a mixture of open agricultural land and commercial premises comprising a mixture of vehicle business, logistics companies and storage warehouses.

Vehicular access to the site is off Prince William Avenue and leads into a secure gated and security fenced entrance at the south-eastern point of the site.

The nearest residential properties are located along factory road, off Prince William Avenue.

The site is not situated within a Nitrate Vulnerable Zone (NVZ) (2017) designated for surface water and groundwater.

The nearest watercourse is the located along the northern boundary of the yard; the River Dee. The River Dee is located approximately 45m from the edge of the northern boundary.

The site is located within a C1 flood risk area – Area of minimal flood hazard (Appendix 9)

The site is located within 200 metres of the River Dee which has protected status (Appendix 2)

The site is not currently located within an Air Quality Management Area.

The following have been identified as potentially sensitive environmental receptors:

- Local Businesses
- Local residential properties
- River Dee

## 1.4 Permitted Activities

Copart UK Limited shall not undertake any waste management activity unless it is specifically listed below in table 1.

**Table 1 – Permitted waste activities**

| Specified Waste Management Operation | Permitted Waste Types which may be subject to the specified Operation                                    | Limits on Specified Waste Management Operations Maximum Storage                                                                                                                                                                                                                                    |
|--------------------------------------|----------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Keeping Storage</b>               | Vehicles drained of all fluids other than fluid in shock absorbers and batteries removed<br><br>16.01.06 | Stored in areas with impermeable pavement and sealed drainage system provided in accordance with condition 2.1.2.<br><br><b>Maximum Storage capacity 150 vehicles / tonnes</b>                                                                                                                     |
|                                      | Undrained vehicles and parts<br>16.01.04                                                                 | Stored in areas with impermeable pavement and sealed drainage system provided in accordance with condition 2.1.2<br><br>Maximum storage on site as a result of motor vehicle dismantling:<br><br><b>Vehicles - 150<br/>Engines / Gearboxes - 250<br/>Tyres - 2500<br/>Catalytic Exhausts - 250</b> |
|                                      | Crushed motor car shells awaiting removal from site                                                      | <b>150 Motor car shells</b>                                                                                                                                                                                                                                                                        |
|                                      | Fluids                                                                                                   |                                                                                                                                                                                                                                                                                                    |

|                                                                                        |                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|----------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                        |                                                                                      | <p>Stored in containers in a bunded area provided in accordance with condition 2.1.2</p> <p>Maximum storage on site as a result of motor vehicle dismantling and draining (only)</p> <p><b>Petrol – 2,050 litres</b><br/> <b>Diesel – 1,025 litres</b><br/> <b>Coolant / Antifreeze – 2,050 litres</b><br/> <b>Brake / clutch – 250 litres</b><br/> <b>Power steering fluid – 250 litres</b><br/> <b>Engine oil (mineral) – 2,050 litres</b></p> |
|                                                                                        | Batteries                                                                            | <p>Stored in a covered area with an impermeable acid resistant base or in an acid resistant, leak proof container with a close-fitting lid to prevent ingress of surface water</p> <p>Maximum storage – <b>250 batteries</b></p>                                                                                                                                                                                                                 |
| <b>Treating</b><br>Dismantling to remove engines and gearboxes. Separation and sorting | Vehicles and vehicle parts not containing fluids other than fluid in shock absorbers | Treated in areas with hardstanding or impermeable pavement provided in accordance with condition 2.1.2                                                                                                                                                                                                                                                                                                                                           |
| Draining and dismantling of vehicles                                                   | Vehicles and vehicle parts containing fluids                                         | Treated in areas with hardstanding or impermeable pavement provided in accordance with condition 2.1.2                                                                                                                                                                                                                                                                                                                                           |
| Size reduction by compaction / crushing                                                | Vehicles and vehicle parts drained of all fluids with batteries removed              | Treated in areas with hardstanding or impermeable pavement provided in accordance with condition 2.1.2                                                                                                                                                                                                                                                                                                                                           |

## 1.5 Permitted Waste Quantities

Permitted waste quantities are detailed in table 2 below;

**Table 2 – Permitted waste quantities on site**

| Permitted Waste Categories                 | Maximum Permitted Quantities (tonnes/year) |
|--------------------------------------------|--------------------------------------------|
| End of life vehicles 16.01.04              | 12,000 per year                            |
| End of life vehicles 16.01.06 (Depolluted) |                                            |

## 1.6 Hours of Operation

The standard hours of operation, including ELV receipt, handling and treatment are presented in table 3 including maintenance activities.

**Table 3 – Site hours of operation**

| Weekday         | Waste acceptance | Waste Treatment | Maintenance |
|-----------------|------------------|-----------------|-------------|
| Monday – Friday | 08.00 – 17.00    | 08.00 – 17.00   | As required |
| Saturday        | Nil              | Emergency only  | As required |
| Sunday          | Nil              | Nil             | As required |
| Bank Holidays   | Nil              | Nil             | As required |

## 1.7 Operating Techniques

Copart UK Limited will ensure that the activities are carried out using the techniques and the manner described below in table 4.

**Table 4 – Operating Techniques**

| Operating Techniques                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ol style="list-style-type: none"><li>1. Uncontaminated ferrous metals and alloys and uncontaminated non-ferrous metals shall be stored on hard standing or an impermeable surface. All other metals shall be stored on an impermeable surface with sealed drainage system.</li><li>2. All metals shall be treated on impermeable surface with sealed drainage system</li><li>3. Uncontaminated plastic, glass and ferrous and non – ferrous wastes arising from the treatment of end of life vehicles shall be stored on hard standing or an impermeable surface with sealed drainage system. All other wastes shall be stored on an impermeable surface with sealed drainage system.</li><li>4. Lead acid batteries shall be stored in containers with an impermeable, acid resistant base and a cover to prevent the ingress of water</li><li>5. Batteries to be stored, PCB's / PCTs containing capacitors and other hazardous waste to be stored in dedicated, labelled and appropriate containers inside the building</li></ol> |

## 1.8 Technical requirements

Hazardous waste shall not be mixed, either with a different category of hazardous waste or with other waste, substances or materials and appropriate measures are taken.

Copart UK Limited will ensure that all batteries will be placed directly into purpose built acid resistant containers / stored on wooden pallets and shrink wrapped within the depollution building on an impermeable surface.

Any hazardous components such as oil filters and brake pads that become detached from ELVs during movement around the site shall be stored separately inside sealed labelled containers inside the building upon impermeable surfacing.

## 2.0 OPERATIONAL OVERVIEW

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## **General Management**

- Copart UK Limited will manage and operate the activities in accordance with the site-specific Environmental Management System (EMS) and the Environmental Permit, using sufficient competent persons and resources. Operating Techniques refer to the technical standards cited within the EA guidance and this specified in this EMS and Environmental Permit.
- Records demonstrating compliance with condition 1.1.1 of the permit shall be maintained in accordance with Section 7 of this document.
- Any person having duties that are or may be affected by the matters set out in this EMS, shall have convenient access to a copy of this document and the permit. These documents shall be displayed in the site office with a copy of the Permit.

## **2.1 Organisational Structure**

- The primary nature of the business is the collection and storage of ELV's.
- The registered office is Acrey Fields, Woburn Road, Wootton, MK43 9EJ.
- The Managing Director has overall responsibility for the permitted operation. The Company employs thirty staff at the site (this includes full time permanent and seasonal staff).
- The Director is responsible for ensuring that the company structure is regularly reviewed and kept updated to reflect any changes in management and staffing within the organisation; and / or as regards external contractors and consultants. Roles and responsibilities will be defined, and a written record will be maintained.
- The Managing Director has overall responsibility for the upkeep and maintenance of the various documents pertaining to the Permit. This include this EMS. The Director had elected to delegate this duty to the organisations Environment & Risk Manager.
- The Environmental Manager has overall responsibility for implementation, audit and review of the system.
- The EMS will be reviewed at least every three years or before if there are any significant operational changes, management changes, complaints, or incidents, whichever occurs sooner.
- In the event of an accident, incident, or non-compliance, as identified in an internal audit or external audit i.e. conducted by the regulatory body, the relevant sections should be reviewed and amended in order to identify and eliminate the root cause.
- Activities on site shall be subject to internal audits on an annual basis to monitor the effectiveness of the EMS and the activities on site.
- Reliable records shall be kept that relate to the EMS. These shall be retained in a secure location and made available to the Regulator and to all those who are working at the site. Further information on record keeping is included in Section 7.

## **2.2 Staffing**

Copart UK Limited shall ensure that sufficient personnel, who are suitably trained and competent, are present to manage and operate the on-site reprocessing activities safely and without causing pollution. Personnel will be fully familiar with the requirements of the Permit as is relevant to their specific duties. Personnel shall have clearly defined roles and responsibilities. The site will also have a technically competent manager to ensure the facility is operated in compliance with regulations, see section 2.4 below. The staff numbers are presented below in table 5.

| Personnel | Management | Office support Staff | Yard Operatives | Drivers | Total |
|-----------|------------|----------------------|-----------------|---------|-------|
| Number    | 7          | 15                   | 20              | 25      | 67    |

The site is operated under the ultimate control of the Manager Director and day to day responsibility rests with the Site Manager. The site employs 67 employees. Staff numbers will be maintained at a level sufficient to operate and supervise the site effectively and throughout periods of employee sickness and holidays.

## 2.3 Training

### Employees

- Training needs shall be identified, and appropriate training provided on an on-going basis. This will include the EMS. All employees will be made aware of the importance of the EMS and supporting management plans. The Site Manager shall maintain training records.
- The EMS identifies risks and provides information on the appropriate measures that must be taken to prevent pollution and to ensure that the site is operated in accordance with the permit. The EMS includes maximum storage quantities that the site is permitted to store.
- Roles and responsibilities shall be clearly communicated to each member of staff. The Site Manager shall ensure that regular and adequate training is provided to staff (and their deputies) who have specific responsibilities for procedures or plant with a potential environmental impact to enable staff to fulfil their role. The Site Manager shall ensure that staff are aware of the potential for harm to personnel and the environment from materials and equipment they are responsible for.
- Training and refresher training records for all members of staff will be updated, maintained, and stored in the site office. These shall be available for inspection (Appendix 3).

### Contractors

- All visitors to the site shall sign in prior to undertaking any works / inspections, and any other business on site
- The Site Manager shall ensure that all visitors attending the site sign in by completing the visitor book located at the reception counter. They shall receive site induction training. This will include: Health and safety, including emergency procedures

All contractors shall be required to sign to confirm that they have received this training.

- The Site Manager will ensure that the permit-to-work procedure is followed at all times. This is located on site. Records will be maintained.
- All sub-contractors that are authorised to collect and deliver vehicles on behalf of Copart receive training that highlights the key elements of the site's EMS, training is undertaken on an annual basis and a written record retained on site.

## 2.4 Technical Competence

The Site Manager and operatives will be appropriately trained and will be conversant with the requirements of the Environmental Permit and Management System, with particular regard to:

- Waste acceptance / rejection procedure
- Operational Controls
- Maintenance Procedures
- Record Keeping
- Awareness of regulatory implications of the permit
- Awareness of all potential environmental effects from the operations
- Emergency action plan and prevention; and
- Notification to the Natural Resources Wales and other regulatory bodies

A copy of the Environmental Permit and Management System will be kept at the site office and will be readily available for reference by site staff, other company staff, Natural Resources Wales and other regulatory authorities.

A designated person will hold a suitable qualification in order to operate the site compliantly (see Table 6 below). The suitably qualified person's actual attendance hours on site will be recorded in the Site Diary. Copies of certificates are located on the site notice board.

| Name            | Qualification        |
|-----------------|----------------------|
| Charles Whyte   | WAMITAB COTC Level 4 |
| Richard Woolley | WAMITAB COTC Level 4 |

Any changes in technically competent management at the site, and/or the name of any incoming personnel, together with any evidence that such personnel has required technical competence, shall be submitted to Natural Resources Wales within 5 working days of change in management. No site operations shall take place unless there is sufficient, trained and competent staff on site.

The site shall be supervised by the Technically Competent Manager for at least 20% or at least 10 hours per week during the hours of operation. The TCM shall sign /out of the site diary each time he / she attends site.

The Site Manager shall maintain training records to demonstrate that the TCM has achieved Continuing Competence (CC). These shall be made available for inspection by the Regulator.

Additionally, during operational hours, the site shall be supervised by the Site Manager / Supervisor who is suitably trained and conversant with the requirements of the Environmental Management System and the Permit conditions with respect to:

- Waste acceptance and control procedures
- Operational controls and environmental monitoring
- Site maintenance (site inspection checklist)
- Record keeping
- Emergency action plans
- Notification to the regulatory body

## **2.4 Site Identification Board**

In conformance with permitting regulations and the Management System, Copart UK Limited shall display a clear, all-weather, easily readable Site Notice at or near the entrance to the site. The Site Sign/Notice shall contain the following information:

- Company Name
- The Permit Number
- Permit Holders Name
- Emergency Contact Number
- Permit Holders Telephone Number
- Statement that the site is permitted by Natural Resources Wales
- Regulatory Body National Telephone Numbers

The Identification Board shall be inspected at least once per week. In the event of damage or defect, the board shall be repaired or replaced within three working days.

There shall also be additional signs giving the following information:

- Site speed limit
- Destination signs for vehicles arriving on site and directions to site reception, and
- Details for Health and Safety requirements

Signage shall be checked and maintained in good condition at all times

## **2.5 Site Security**

Site security is based on the following objectives:

- To prevent possible unauthorised access to the site, either by humans or livestock, so far as is practicable; and
- To prevent /minimise vandalism to site plant and reduce the potential for pollution or injury outside operational hours.

Vehicular access to the site is restricted by the provision of one lockable metal gate at the site entrance. Additionally, access is restricted along the remaining boundaries by 1.8m palisade fencing.

The site security shall be fully inspected at the commencement of each working day. Any defects or damage shall be made secure by temporary repair by the end of each working day and shall be repaired within 24 hours of the damage being detected. All inspections, defects, damage and repairs shall be recorded in the site diary or log sheets.

The site has the benefit of CCTV cameras placed at strategic locations all around the site (Appendix 4). This is remotely monitored over the 24-hour period.

The site shall be kept closed and secure at all times when unattended.

All callouts and follow-up action will be recorded in the Site Diary as soon as practicable, preferably within 24 hours of the call being made.

## **2.6 Site Office and Site Lighting**

Flood lights will be erected around the site to provide adequate lighting during the hours of darkness.

## **3.0 Site Operations**

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Site operations are carried out as per Section 3.0. The operational procedures are deemed appropriate for the waste types to be processed.

### **3.1 Contingency Planning**

The Site Manager shall ensure that there are contingency plans in place to manage storage and treatment operations in the event of:

- Machinery / Plant Breakdown
- Accidents that may result in pollution to the environment
- Delivery problems
- Adverse weather conditions
- Staff shortages

The Site Manager shall ensure that there are:

- Repair / servicing contracts in place for all plant and machinery
- That repair / replacement can be achieved timely
- That there is sufficient storage provision in the case of interruptions to the operation
- Available staff to cover absence

Plant maintenance records shall be maintained. These shall be made available for inspection by the regulator.

### **3.2 Control of mud & debris**

The likelihood of mud and debris being deposited on the public highway is considered unlikely for the following reasons:

- The site access road and operational areas all comprise concrete / tarmacadam / aggregate
- Containment, storage and treatment of waste is in designated areas within the site and / or containers and on concrete surfaces;
- The maintenance of clean vehicle turning areas, free of extensive mud deposits;
- In the unlikely event of significant mud deposits being evident on a vehicle's wheels, the vehicle shall be stopped, and any mud shall be removed by hose before leaving the site.

In the unlikely event of any mud/debris found to be on the public highway resulting from lorry movements, from the site, the affected public areas outside the site shall be cleaned, traffic shall be isolated from sources of mud/debris within the site to prevent the further tracking of mud/debris. Measures shall be taken to clear any such sources from the highway as soon as is practicable.

The site manager will report the incident to the local authority (Wiltshire Council) and arrange with a local contractor for the road to be cleaned via a mechanical road sweeper as soon as is practicable. Any incident will be recorded within the site diary.

### **3.3 Potentially polluting leaks and spills**

Adherence to the monitoring regime set out in table 8, in conjunction with the site engineering for pollution prevention and the acceptance of non - hazardous uncontaminated wastes and hazardous waste contained within ELV's only, shall ensure that the risk of potentially polluting leaks and spillages from the site is minimised.

Treatment and storage shall be carried out within a building that benefits from concrete impermeable concrete surfacing and sealed drainage system that shall significantly reduce the potential for polluting spills to enter the ground or surface water. There is no pathway to ground or surface water as there are no drainage discharge points from within the building.

Hazardous wastes such as lead acid batteries shall be stored within purpose built lidded battery boxes / stored on wooden pallets with Shrink Wrap inside the building. All potentially polluting substances removed from ELV's will be stored in purpose built sealed, labelled tanks and vessels inside the building / sealed bunded above ground tanks outside.

Any minor spillages of liquid metal or oil shall be cleaned up immediately, using proprietary absorbent materials / absorbent pads to clean up liquids. In the unlikely event of a major spillage, immediate action shall be taken to prevent contamination entering surface drains, watercourses and un-surfaced ground. Pollution spill kits and oil absorbent shall be placed around the area affected until the spill is cleared up.

Once the spillage has been contained any materials that may be subject to contamination shall be cleared immediately and placed in sealed, labelled containers. Natural Resources Wales shall be informed immediately, and the details of the event recorded in the site diary.

In the event that a spillage has contaminated the surface water drainage system, the site manager shall arrange for the drainage system to be cleaned and emptied and the contents disposed of to a suitably permitted site. Duty of Care paperwork shall be maintained at the site. Natural Resources Wales will be notified with immediate effect.

### **3.4 Fires on site**

No wastes shall be burnt on site. There shall be no smoking within the building. The use of welding/cutting tools (i.e. with naked flame) must be sanctioned first by the site manager/competent person.

Special care shall be taken with respect to potentially explosive/volatile material during handling, e.g. aerosol cans, oxidising agents, corrosive substances. These shall be removed from the metal load prior to further handling. These wastes are not permitted under the permit and, the quantities and occurrence of these metal types entering the site is predicted to be small as long as the metal acceptance procedures as strictly adhered to.

All site operatives shall be required to recognise signs of smouldering ELVs at the point of reception. Such ELVs shall be removed to a safe area. The site manager shall be informed. In the event of a smouldering ELV, the operative shall make an immediate assessment of the situation and inform the site manager. The fire shall be extinguished as soon as practicable.

Any fire event on site that requires the attendance of the emergency services will be reported to Natural Resources Wales within 24hrs and a reference number obtained and filed.

## **Fire training**

Appropriate fire extinguishers shall be kept within the site boundary and shall be easily accessible. All site operatives shall be trained in accordance with the Company Fire Procedure.

The Site shall maintain such a number of trained Fire Marshalls, all training shall be recorded and stored with the site manager.

## **3.5 Waste acceptance and control Procedures**

Waste is pre-arranged prior to arrival so that the site can manage incoming loads.

Waste acceptance and control procedures are based on the following categories:

- The inspection of incoming ELVs and appropriate documentation
- The maintenance of Duty of Care ELV transfer notes and Hazardous Waste Consignment Notes

All ELVs received at the site shall be visually inspected to confirm that the description and composition conform to the written description and the European Waste Code on the relevant Duty of Care Transfer Note and to any other accompanying documentation including Hazardous Waste Consignment Notes.

Once confirmed the ELVs shall be offloaded to the appropriate area where the ELV shall be visually checked by a yard operative to ensure that there are no non-permitted wastes within the load. All ELVs received shall be kept separate until they have been inspected by a yard operative and logged onto the electronic system for tracking purposes, once they have been received, they will be stored in the allocated row location.

## **3.6 Waste refusal**

In the event that an ELV, upon inspection, is non-compliant with the Environmental Permit the following steps shall be implemented:

- Refusal of the ELV (s) to be unloaded into the receiving area
- Enter the event in the site diary
- Contact the waste producer to advise and arrange collection / disposal

Any items of non-permitted waste which are detected after acceptance at the site shall be placed immediately in the designated quarantine storage area, comprising a skip or similar container and segregated from the other wastes. The details shall be entered into the site diary.

Natural Resources Wales shall be informed immediately in respect of all hazardous waste rejected by the site. Quarantined waste shall be removed from site within 7 days. A record shall be kept of all rejected waste in the Site Diary.

### 3.7 Site inspections

The site inspections shall be in the form of a checklist and undertaken by the Technically Competent Person (TCM) or nominated person in his / her absence. The checklist report shall be kept on file and made available to Natural Resources Wales. Table 8 represents the areas that need to be covered and gives the appropriate time intervals.

As part of both weekly and monthly site inspections, all drainage points are inspected to ensure that all gullies are free of debris and in such a condition that they are fully operational, all drainage grates are free of litter and debris and function.

Following heavy or prolonged rainfall / snow, the drainage system is checked daily to ensure that it is fully functional and without defect.

If a defect is highlighted, this should be reported immediately to the site manager to arrange an approved local contractor to investigate defects and close out highlighted defects.

All information is recorded on the weekly / monthly site inspection sheet and filed on site for inspection by Natural Resources Wales.

A copy of the site inspection checklist is included in Appendix 5.

**Table 8 – Site Inspection Checklist**

| Issue                                                               | Frequency | Action                                                                                                                                                                                                                               |
|---------------------------------------------------------------------|-----------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| General site and road cleanliness (presence of mud /debris)         | Daily     | Sweep impermeable surfacing if mud/ debris present. Record Inspections /actions in diary.                                                                                                                                            |
| Inspect drums, drip trays and containers for leaks                  | Daily     | Any leaks to be stopped and cleaned up, containers to be replaced/ repaired immediately. Record Inspections/ defects, damage and repairs in diary                                                                                    |
| Inspect all tanks and bunding and empty if required                 | Daily     | As above. Empty the bunds if required and dispose of to a suitably permitted site. Record Inspections/defects, damage and repairs in diary.                                                                                          |
| Visual inspection of boundary fences /walls for breaks / damage     | Daily     | Any defects shall be made secure by temporary repair before the start of operations/end of working day and shall be repaired within 24 hours of the damage being detected. Record Inspections/ defects, damage and repairs in diary. |
| General site Cleanliness (presence of litter outside site boundary) | Daily     | Site walkover and inspection. Collection from inside and outside site once daily. Investigate the cause. Record Inspections                                                                                                          |
| Surface dust/debris                                                 | Daily     | Sweep yard, remove debris and damp down in dry weather                                                                                                                                                                               |
| Site Signage                                                        | Weekly    | Check that signs are in good condition and arrange to repair /replace if damaged. Record Inspections/ defects, damage and repairs in diary                                                                                           |
| Gas Cylinder Storage Cage                                           | Daily     | Check orphaned gas cylinder storage is safe. Record inspections/ defects, damage and repairs in diary                                                                                                                                |

|                                                                                                                           |         |                                                                                                                                                                                                                             |
|---------------------------------------------------------------------------------------------------------------------------|---------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Pest Infestation check                                                                                                    | Daily   | Contact contracted pest control company if presence of pests is noted. Record Inspections and results in site diary                                                                                                         |
| Ensure waste is stored in segregated areas within the processing and storage areas within building (tyres, batteries etc) | Daily   | Check quantities are in accordance with EMS and Permit. Segregate as and when necessary. Record in site diary.                                                                                                              |
| Inspection of plant                                                                                                       | Daily   | Maintenance/repair/regular servicing. Record in diary or plant maintenance log sheets                                                                                                                                       |
| Check oil separator is clean and in good working order. Arrange maintenance if needed.                                    | Weekly  | Remove liquids and silt as and when necessary. Empty interceptor by vacuum tanker and dispose of to a licensed third-party disposal facility as and when required. Record Inspections/ defects, damage and repairs in diary |
| Inspect gulley grates / Drainage system                                                                                   | Weekly  | Ensure these are free of silt and debris, clear / repair as necessary.                                                                                                                                                      |
| Inspection of skips, containers and 'Roro' bins for damage                                                                | Weekly  | Repair / replace                                                                                                                                                                                                            |
| The building and roofing                                                                                                  | Weekly  | Any defects affecting the integrity shall be repaired within one week.                                                                                                                                                      |
| Check condition of impermeable surfacing in the processing areas                                                          | Monthly | Maintenance/repair of cracks etc. Record in diary                                                                                                                                                                           |

## 4.0 POLLUTION CONTROL, MONITORING & REPORTING

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### Introduction

A risk assessment encompassing whole business significant aspects, impact and risks has been produced in accordance with Natural Resource Wales guidance. Please refer to the risk assessment found in Appendix 6.

## **5.0 EMISSIONS & MONITORING**

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Waste management facilities have the potential to cause pollution if emissions are not controlled and monitored appropriately. This operation does not involve any point source emissions to air, land or water from any areas where waste is stored and treated (depolluted) inside the building.

Surface water falling onto the external operational area drains via gullies and an oil separator to the public surface water sewer. The oil separator is subject to regular maintenance and inspection.

The following sections therefore set out the appropriate measures that the site has taken to prevent or minimise the risk to potentially sensitive receptors.

## 5.1 Monitoring Control and Reporting of Dusts, Fibres, Particulates

Given the nature of the waste inputs, dust is not an issue at this site. However, the key sources for the generation of dust on – site are listed below:

- Dust raising from concrete / tarmacadam access road and operational surfaces through vehicle movements;
- Dust raising from the deposit, mechanical movement and loading and of ELVs
- Loading /unloading of ELVs

The site manager shall take all reasonable measures to reduce and prevent dust emissions generated by the site. The table below sets out the measures that shall be undertaken to control and monitor the release of dust, fibres and litter.

**Table 9 – Measures to Control and Monitor the Release of Dust, Fibres and Particulates**

| Measures                       | Specifications                                                                                                                                                                                                                                                                                                                              | Requirements                                                                                                                                                                                                                                                                                                                                                                 |
|--------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Physical Containment           | Limiting site speed limits                                                                                                                                                                                                                                                                                                                  | Speed on site limited to <5mph                                                                                                                                                                                                                                                                                                                                               |
| Monitoring of aerial emissions | Daily visual monitoring of aerial emissions at site boundaries shall be carried out by staff supervising waste handling operations                                                                                                                                                                                                          | <ul style="list-style-type: none"> <li>• Nominated staff shall monitor at least once per day at the site boundary that is downwind of operations</li> <li>• Observations and weather conditions including wind condition shall be recorded in the site diary</li> <li>• All complaints shall be recorded in the site diary and on the complaint form (Appendix 7)</li> </ul> |
| Operational Procedures         | <ul style="list-style-type: none"> <li>• All waste handling, loading, unloading, treatment to be undertaken inside the depollution building</li> <li>• Daily sweeping of operational areas on a need must basis</li> <li>• Dampening of site vehicle access route, manoeuvring areas and ELV handling areas using a water bowser</li> </ul> | As required                                                                                                                                                                                                                                                                                                                                                                  |

The site manager shall take account of the weather conditions and operate the water bowser (if available), on a, needs must basis throughout any waste handling operations that are undertaken in the external areas and which may have the potential to generate dust emissions.

The TCM shall nominate a person, or persons to be responsible in the absence of the TCM to undertake and record daily random visual monitoring events. Additionally, all staff shall be made aware of the importance of preventing dust emissions from leaving the boundary of the site.

Records of each inspection shall be made in the site diary and shall include the time, date, wind direction, weather conditions, site activities, signature, comments and result at time of inspection. The form is included in Appendix 5.

In the event of a complaint the site manager shall immediately investigate the source of the dust and whether it is originating from the site. Action shall be taken to prevent any further emissions leaving the site. A complaints form shall be completed describing the incident and should include details as specified above. A record shall also be made in the site diary /log sheet. The form is included in Appendix 7.

## **5.2 Monitoring and Control of Odours**

This type of operation is very unlikely to result in the generation of odours however monitoring shall be undertaken by the site manager/supervisor at least once per day downwind of the site boundary. All monitoring events shall be recorded in Site Diary/log sheet.

In the event of particularly odorous waste being discovered in an ELV, the operator shall place the waste in sealed bags or a sealed container and remove it from site as soon as practicable. Details of the event and any complaints shall be recorded in the site diary.

In the event of a complaint the site manager shall investigate the site to assess the origin of the odour. A complaints form shall be completed, and a record made in the site diary. The form is included in Appendix 7.

## **5.3 Monitoring and Control of Noise**

There are no maximum noise limits imposed by the Planning consent.

The Operator recognises that noise impacts must be managed in order to prevent any nuisance to sensitive receptors located near close to the site.

The site manager shall ensure that:

- Noise impacts are considered as part of routine inspections;
- Noise impacts are controlled at source using good operational practices, including physical and management control measures;
- All appropriate measures are taken to prevent, or where that is not reasonably practicable to reduce noise emissions.

The key sources of noise at the site are listed below;

- Loading / unloading dry metal, containers, skips;
- Loading / unloading ELVs

- Forklift trucks;
- HGV Movements
- Vehicle movements to and from site
- Depollution rigs and associated activities

It is important to note that the above sources do not generate noise continuously. This means that noise levels vary throughout the working day. The following paragraphs highlight the nature of these sources.

Vehicles movements both to the site, from the site and within the site for unloading, loading and mobile plant movements occur intermittently between the hours of 08.00 – 17.00 hours on Monday to Friday and on Saturday, between 08.00 – 13.00 hours. Vehicles comprise cars, vans, skip lorries and 32 tonne lorries. Mobile plant comprises of 8 JCB Loaders, 1 FLT, 1 tractor and 1 360<sup>0</sup> grab crane.

Skip lorries delivering replacement waste skips to the site - It is therefore recognised that on occasion there shall be some noise associated with that activity. All activities shall be undertaken within normal operational hours Monday to Friday only.

It is recognised that noise has the potential to travel via the air and impact sensitive residential receptors. The nearest residential properties are located approximately 45 metres from the site, However, the site is located within an industrial estate and surrounded by a wide range of business services including motor traders, large industrial processing factories and storage and logistics facilities that operate 24hr a day.

The Operator shall ensure that control measures are taken to minimise noise levels beyond the site boundary, to the satisfaction of the Planning Authority and Natural Resources Wales. These are summarised in table 10;

**Table 10 – Measures to Control Noise**

| Measures               | Specifications                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Requirements                                                    |
|------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------|
| Operational Procedures | <ul style="list-style-type: none"> <li>• All waste treatment activities shall be within the depollution building</li> <li>• Limitation to operational hours</li> <li>• Limiting vehicle speeds within the site to 5mph.</li> <li>• Maintenance of site access roads and site surfaces.</li> <li>• Plant machinery and equipment shall be so installed, maintained and operated in accordance with manufacturer's guidelines and within acoustic enclosures where their use necessitates this. Maintenance records are maintained and are open to inspection.</li> <li>• Suppression or limitation of audible noise from warning devices on vehicles.</li> <li>• Plant, machinery and engines switched off when not in use</li> <li>• If at any time it is necessary to undertake operations of a temporary nature that have the potential to generate elevated levels of noise the TCM or nominated person shall contact NRW to inform them to advise them that noise shall be temporary.</li> <li>• Staff is trained to recognise elevated levels of noise from plant and equipment. Staff are responsible for reporting any noise problems to the TCM to enable the issue to be rectified.</li> <li>• If plant/ machinery are found to be faulty and operating at elevated levels the TCM shall immediately arrange repair/replacement.</li> </ul> | <p>Site Permit</p> <p>EMS based on regulatory body guidance</p> |

|                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |          |
|----------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------|
|                      | <ul style="list-style-type: none"> <li>In the event of breakdown of equipment and plant, elevated noise levels may leave the site. In this case the site shall consider limiting the hours of operation or immediately cease the activity and arrange repair replacement.</li> <li>Staff, are trained to avoid all unnecessary noise due to misuse of plant and equipment and other sources of noise such as unnecessary shouting / radios, etc. If noise emissions are caused due to a failure in the standard of operation the TCM shall arrange retraining</li> </ul> |          |
| Physical Containment | <ul style="list-style-type: none"> <li>All treatment (depollution) activities are undertaken within the depollution building</li> <li>If the physical control measures are not adequate to prevent noise emissions the Operator shall make improvements to the infrastructure in consultation with NRW</li> </ul>                                                                                                                                                                                                                                                        | As Above |
| Noise Monitoring     | <ul style="list-style-type: none"> <li>None required</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | EMS      |

In the event that a complaint is received direct from source or from NRW, the TCM or nominated person shall complete a Complaint Form recording all details and undertake an investigation to determine if the source is on site. If it is confirmed that site activities are the cause of the noise impact the activity shall immediately cease until the problem is rectified. The details of the investigation shall be kept with the complaint form.

The TCM shall contact Natural Resources Wales to inform them of the investigation and actions taken. Details of all complaints, investigations and actions taken shall be recorded in the Site Diary and on the complaint form (Appendix 6). Records shall be retained for inspection.

## 5.4 Monitoring and Control of Litter

The risk of litter becoming a nuisance is considered to be low because of the waste types. However, the potential for litter nuisance shall be further minimised with the implementation of the following provisions:

- Daily inspection of the site boundary at least once per day, to be recorded in the site diary;
- Litter Picking
- Skips, bins and other waste containers to be kept closed / netted at all times

## 5.5 Monitoring and Control of Pests

An inspection of stored waste for pest infestations shall be carried out at least at weekly intervals by the yard manager and shall be recorded in the site diary.

On detection or notification of pest infestations, immediate action shall be taken to:

- Isolate and secure/ removal of waste(s) that are attracting scavengers or flies;
- Secure the attendance of a professional pest control contractor, to eliminate the pest infestation.

The incident and remedial action shall be recorded in the site diary.

## **6.0 Notifications**

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### **Reporting to the Regulatory Body**

The business shall ensure that Natural Resources Wales is notified in the following circumstances.

Natural Resources Wales shall be notified without delay following the detection of:

- (a) 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;
- (b) the breach of a limit specified in the permit; or
- (c) any significant adverse environmental effects.

Written confirmation of actual or potential pollution incidents and breaches of emissions shall be submitted within 24 hours.

Where Natural Resources Wales has requested in writing that it shall be notified when the operator is to undertake monitoring and/or spot sampling, the business shall inform Natural Resources Wales when the relevant monitoring and/or spot sampling is to take place. The business shall provide this information to Natural Resources Wales at least 14 days before the date the monitoring is to be undertaken.

Natural Resources Wales shall be notified within 14 days of the occurrence of the following matters except where such disclosure is prohibited by Stock Exchange rules:

- (d) 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.
- (e) Where the operator is a corporate body other than a registered company:
  - any change in the operator's name or address; and
  - any steps taken with a view to the dissolution of the operator.
- (f) In any other case:
  - the death of any of the named operators (where the operator consists of more than one named individual);
  - any change in the operator's name(s) or address(es); and any steps taken with a view to the operator, or any one of them, going into bankruptcy, entering into a composition or arrangement with creditors, or, in the case them being in a partnership, dissolving the partnership.

## **7.0 Site Records**

---

### **7.1 Security and Availability of Records**

All Duty of Care Transfer Notes shall be kept for a minimum of 2 years and Hazardous Waste Consignment Notes for a minimum of 3 years in the site office (or other designated centre of administration) in a locked cabinet secure from loss, damage and deterioration.

Waste accepted by the site, waste rejected by the site and/or despatched from the site and site diaries shall be kept in the site office for a minimum of 3 years. These shall be available for inspection by an authorised person.

## **7.2 Records of Waste Movements (Waste Returns)**

Records of all waste movements shall be kept in accordance with the relevant condition in the permit. Additionally, a summary record of the waste types accepted and removed from the site shall be made on the Natural Resources Wales form every quarter. This information shall be submitted to Natural Resources Wales within 1 month following the end of the quarter.

## **7.3 Records of off-site Environmental effects**

Records of any off-site environmental effects including pollution incidents that caused or were alleged to have caused, harm or health effects shall be kept until the site is surrendered.

## **7.4 Records of on-site Environmental effects**

Records that relate to the condition of the land and groundwater shall be kept until the permit surrender. Records shall include details on;

- design, construction, inspection, monitoring & maintenance
- Failure of pollution prevention control measures
- Spills and incidents
- Records of investigations and remedial actions
- Records of remedial action in response to non-conformances as noted by a Environment Agency Officer

## **7.5 Site Diary**

A site diary shall be kept secure within the site office and made available for inspection by the Environment Agency as and when required. The diary shall contain the following information and be maintained in a form in which it can be audited:

- Start and finish of any construction works
- Maintenance
- Plant and machinery breakdowns
- Emergencies
- Problems with ELVs received and action(s) taken
- Site Inspections and consequent actions carried out by the site management team
- TCM attendance – the date and the time on site and the time left site
- Dispatch of any records to the Regulatory Body
- Severe weather conditions
- Any environmental issues and remedial action(s) taken



- Any complaints related to operational activities
- Records of site monitoring – odour / dust / litter / pests / surface water
- Records of inspection of the interceptor

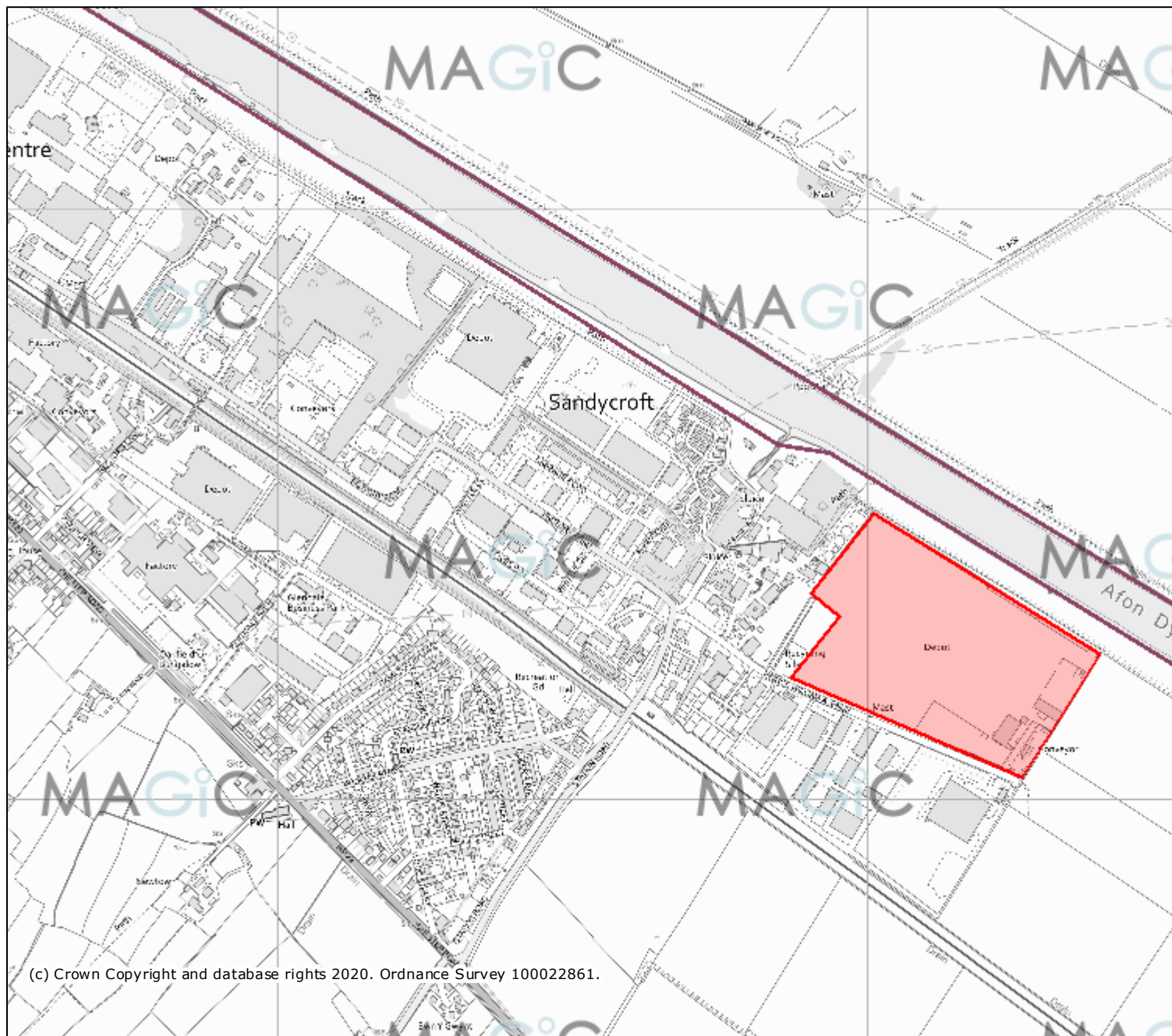
All records shall be completed within 24 hours of the event

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## Appendix 1 – Site Map

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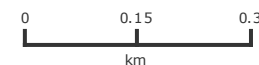
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ymin = 366700

xmax = 335200

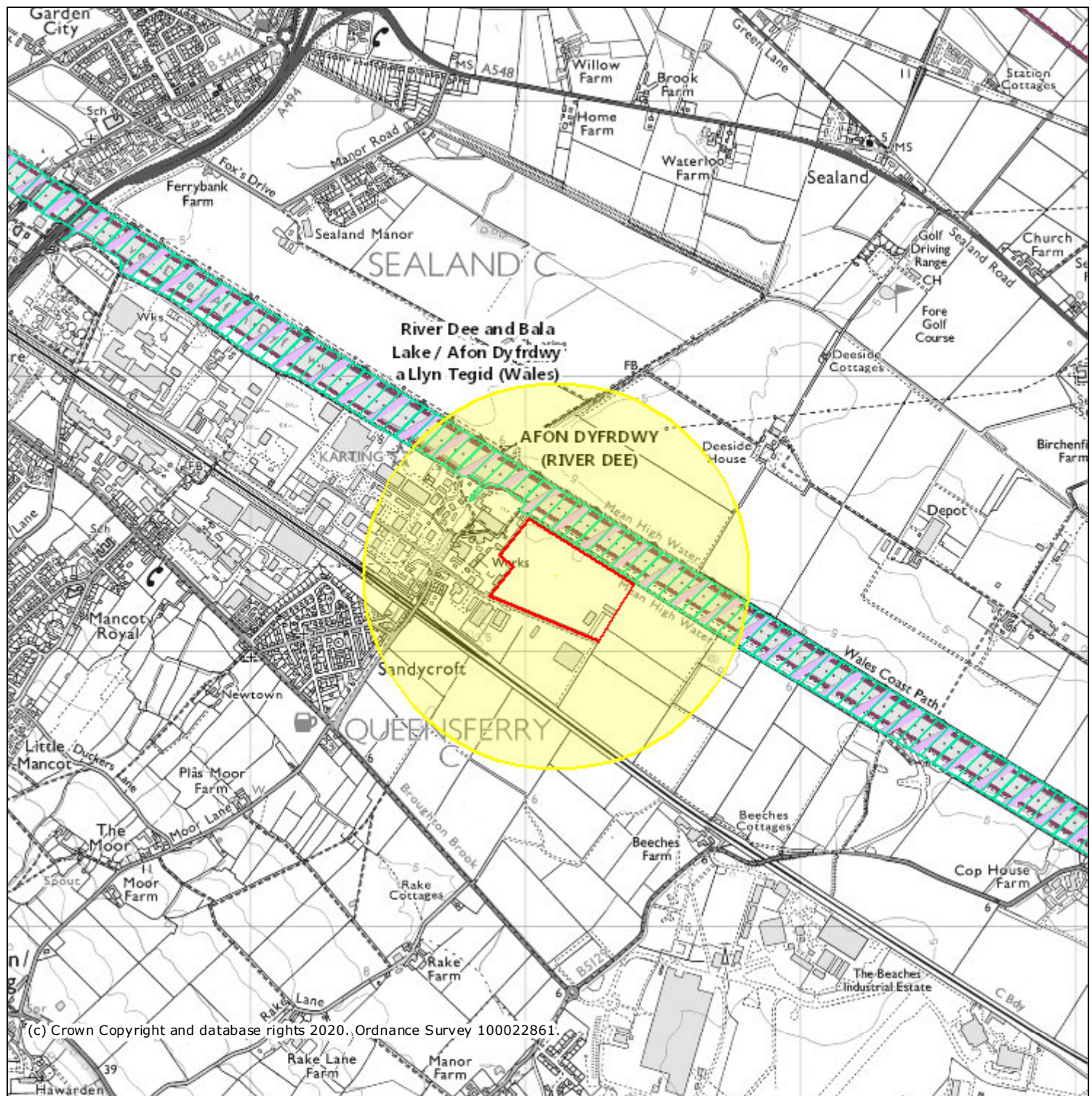
ymax = 368200



Map produced by MAGIC on 10 November, 2020.  
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## Appendix 2 – Environmentally Sensitive Receptors

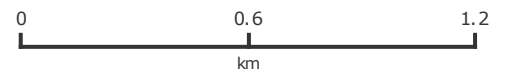
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### Legend

-  National Nature Reserves (Wales)
-  Ramsar Sites (Wales)
-  Sites of Special Scientific Interest (Wales)
-  Special Areas of Conservation (Wales)
-  Special Protection Areas (Wales)
-  Biosphere Reserves (Wales)



Projection = OSGB36

xmin = 330700

ymin = 365800

xmax = 337400

ymin = 368900

Map produced by MAGIC on 13 November, 2020.

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## Appendix 3 – Staff Training Matrix

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Copart UK Ltd  
Environmental Management System (EMS)  
ISO 14001:2015

Environmental Training Log

September 2019

| Revision | Date       | Version No | Reason for amendment | Updated by | Signature                                                                            |
|----------|------------|------------|----------------------|------------|--------------------------------------------------------------------------------------|
| N/A      | 11/09/2019 | 1          | N/A                  | RD Woolley |  |
|          |            |            |                      |            |                                                                                      |
|          |            |            |                      |            |                                                                                      |
|          |            |            |                      |            |                                                                                      |
|          |            |            |                      |            |                                                                                      |
|          |            |            |                      |            |                                                                                      |



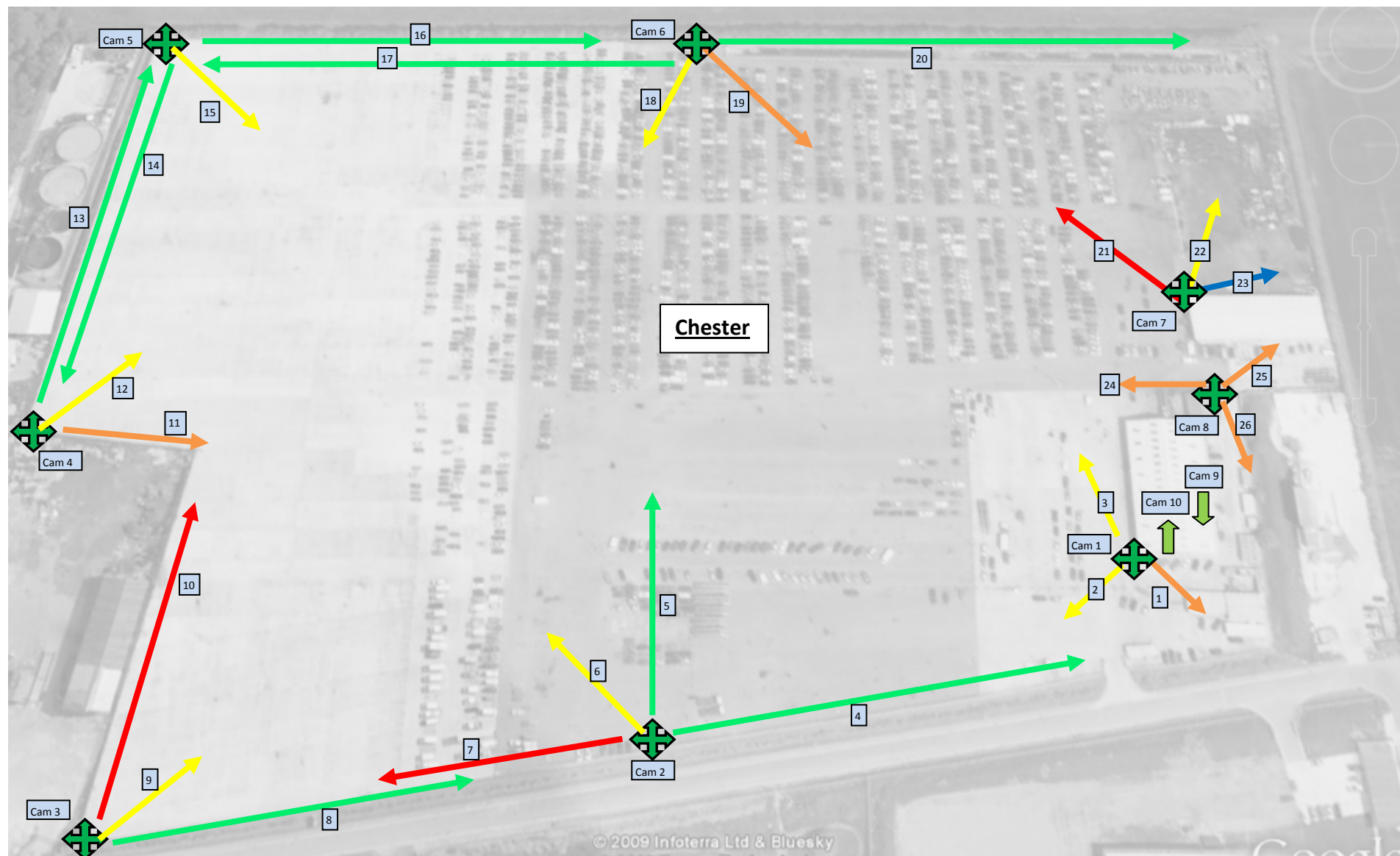
## Operation Centre Environmental Training Requirement Matrix

| Operation Centre: All Operation Centres                                                                                                                                                                                                                                                                                                                                   |                                               |                                   |                                    |                         |                      |                                         |                      |                          |                                       |          |  |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------|-----------------------------------|------------------------------------|-------------------------|----------------------|-----------------------------------------|----------------------|--------------------------|---------------------------------------|----------|--|
| Colleague Name                                                                                                                                                                                                                                                                                                                                                            | Training Undertaken                           |                                   |                                    |                         |                      |                                         |                      |                          |                                       | Comments |  |
|                                                                                                                                                                                                                                                                                                                                                                           | Environmental Awareness                       |                                   |                                    |                         |                      |                                         |                      | Pollution & Emergency    |                                       |          |  |
|                                                                                                                                                                                                                                                                                                                                                                           | Certificate of Technical Competence (WAMITAB) | Hazardous Waste Consignment Notes | Environmental and permit awareness | Environmental Awareness | Fire Prevention Plan | Site Environmental Inspection Reporting | IOSH Managing Safely | Spill response procedure | Emergency & Pollution Prevention Plan |          |  |
| <div><div></div><div>Core Skills - Training / Knowledge required prior to completion of probationary period</div><div></div><div>Additional training / knowledge required to fulfil all roles within the position</div><div></div><div>Optional training for additional responsibilities not specific to position</div><div></div><div>Not applicable to role</div></div> |                                               |                                   |                                    |                         |                      |                                         |                      |                          |                                       |          |  |
| Site Management Team                                                                                                                                                                                                                                                                                                                                                      |                                               |                                   |                                    |                         |                      |                                         |                      |                          |                                       |          |  |
| General Manager                                                                                                                                                                                                                                                                                                                                                           |                                               |                                   |                                    |                         |                      |                                         |                      |                          |                                       |          |  |
| Assistant GM                                                                                                                                                                                                                                                                                                                                                              |                                               |                                   |                                    |                         |                      |                                         |                      |                          |                                       |          |  |
| Yard Team                                                                                                                                                                                                                                                                                                                                                                 |                                               |                                   |                                    |                         |                      |                                         |                      |                          |                                       |          |  |
| Yard Manager                                                                                                                                                                                                                                                                                                                                                              |                                               |                                   |                                    |                         |                      |                                         |                      |                          |                                       |          |  |
| Yard Supervisor                                                                                                                                                                                                                                                                                                                                                           |                                               |                                   |                                    |                         |                      |                                         |                      |                          |                                       |          |  |
| Yard Operatives                                                                                                                                                                                                                                                                                                                                                           |                                               |                                   |                                    |                         |                      |                                         |                      |                          |                                       |          |  |
| Transport Team                                                                                                                                                                                                                                                                                                                                                            |                                               |                                   |                                    |                         |                      |                                         |                      |                          |                                       |          |  |
| Transport Manager                                                                                                                                                                                                                                                                                                                                                         |                                               |                                   |                                    |                         |                      |                                         |                      |                          |                                       |          |  |
| Drivers                                                                                                                                                                                                                                                                                                                                                                   |                                               |                                   |                                    |                         |                      |                                         |                      |                          |                                       |          |  |
| Processing Team                                                                                                                                                                                                                                                                                                                                                           |                                               |                                   |                                    |                         |                      |                                         |                      |                          |                                       |          |  |
| Processing Operatives                                                                                                                                                                                                                                                                                                                                                     |                                               |                                   |                                    |                         |                      |                                         |                      |                          |                                       |          |  |
| Office Team                                                                                                                                                                                                                                                                                                                                                               |                                               |                                   |                                    |                         |                      |                                         |                      |                          |                                       |          |  |
| Office Manager                                                                                                                                                                                                                                                                                                                                                            |                                               |                                   |                                    |                         |                      |                                         |                      |                          |                                       |          |  |
| Office Supervisor                                                                                                                                                                                                                                                                                                                                                         |                                               |                                   |                                    |                         |                      |                                         |                      |                          |                                       |          |  |
| CSR                                                                                                                                                                                                                                                                                                                                                                       |                                               |                                   |                                    |                         |                      |                                         |                      |                          |                                       |          |  |

## Appendix 4 – Site CCTV Map

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# Site Plans





## Appendix 5 – Environmental Site Inspection Sheet

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## Monthly Site Environmental Inspection

Site \_\_\_\_\_ Inspection undertaken by \_\_\_\_\_

Time of Inspection \_\_\_\_\_ Weather Conditions \_\_\_\_\_

Date of Inspection \_\_\_\_\_

| Inspection Items            |                                                                                                                           | Action Required? |    | N/A | Remarks (i.e. specify location, problem observed, possible cause of non-conformity and / or proposed corrective / preventative action(s)) |
|-----------------------------|---------------------------------------------------------------------------------------------------------------------------|------------------|----|-----|-------------------------------------------------------------------------------------------------------------------------------------------|
|                             |                                                                                                                           | Yes              | No |     |                                                                                                                                           |
| <b>Legal Compliance</b>     |                                                                                                                           |                  |    |     |                                                                                                                                           |
| Scrap Metal Dealers Licence |                                                                                                                           |                  |    |     | Expiry date                                                                                                                               |
| Electricity meter reading   |                                                                                                                           |                  |    |     | Meter 1:<br>Meter 2:<br>Meter 3:<br>Meter 4:<br>Meter 5:                                                                                  |
| WAMITAB Holders             |                                                                                                                           | 1:<br>2:         |    |     |                                                                                                                                           |
| 1.                          | <b>Air Pollution Control</b>                                                                                              |                  |    |     |                                                                                                                                           |
| a.                          | Plant equipment and machinery (any black smoke observed, please indicate the plant number)                                |                  |    |     |                                                                                                                                           |
| b.                          | Refrigeration Gas Escapes (Is there any visible damage to any AC unit)                                                    |                  |    |     |                                                                                                                                           |
| c.                          | Hoarding provided along boundaries and properly maintained (any damage / opening observed, please indicate the location). |                  |    |     |                                                                                                                                           |
| 2.                          | <b>Land Pollution Control</b>                                                                                             |                  |    |     |                                                                                                                                           |
| a.                          | Is concreted area in good condition?                                                                                      |                  |    |     |                                                                                                                                           |
| b.                          | Are there any unmanaged fuel / oil spillages?                                                                             |                  |    |     |                                                                                                                                           |



|                                                          |                                                                                                                                                                                                        |  |  |  |  |
|----------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|--|--|--|
| c.                                                       | Are there any burnout vehicles stored on unprotected land i.e. not on concrete?                                                                                                                        |  |  |  |  |
| d.                                                       | Any fuel / oil / AdBlue stored on unprotected land?                                                                                                                                                    |  |  |  |  |
| e.                                                       | Are portable fuel containers (jerry cans) kept on a bund or drip tray?                                                                                                                                 |  |  |  |  |
| f.                                                       | Are drip mats/trays in use under mobile plant i.e. balers etc?                                                                                                                                         |  |  |  |  |
| g.                                                       | Are bunds, drip trays and drip mats free from rainwater and spill content?                                                                                                                             |  |  |  |  |
| h.                                                       | Are sufficient spill kits available at suitable locations (check if any have been used or if they are in need of replacement) and are their containers free from rubbish and used absorbent materials? |  |  |  |  |
| i.                                                       | Is there any oil spillage? Clean-up the contaminated soil immediately?                                                                                                                                 |  |  |  |  |
| <b>3. Water Pollution Control &amp; Water Management</b> |                                                                                                                                                                                                        |  |  |  |  |
| a.                                                       | Is onsite drainage adequate and working appropriately i.e. Gullies and channels free of debris?                                                                                                        |  |  |  |  |
| b.                                                       | Visual signs of pollution in watercourses or of contaminated water reaching these water courses                                                                                                        |  |  |  |  |
| c.                                                       | Are all manholes on site sealed and covered?                                                                                                                                                           |  |  |  |  |
| d.                                                       | Interceptor condition and operational (any visible leak, 'sheen' around the base of interceptor?                                                                                                       |  |  |  |  |
| e.                                                       | Are sedimentation traps free of silt and sediment i.e. wash bays                                                                                                                                       |  |  |  |  |

|           |                                                                                                                                                                        |  |  |  |  |
|-----------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|--|--|--|
| f.        | Debris and silt removed from wash bay                                                                                                                                  |  |  |  |  |
| g.        | Are all water supply pipes free from leaks? E.g. hosepipes                                                                                                             |  |  |  |  |
| h.        | Are all taps (Internal & External) free from leaks / drips?                                                                                                            |  |  |  |  |
| i.        | Are all toilets / urinals free from leaks / drips?                                                                                                                     |  |  |  |  |
| <b>4.</b> | <b>Waste Management</b>                                                                                                                                                |  |  |  |  |
| a.        | Is the site kept clean and tidy? (e.g. litter free as far as reasonably practical, good housekeeping)                                                                  |  |  |  |  |
| b.        | Is there a recycling scheme in operation?                                                                                                                              |  |  |  |  |
| c.        | Are all waste skips / containers:<br>Lids / covers securely on<br>Easily accessible to staff<br>In good condition (i.e. no holes / tears etc)                          |  |  |  |  |
| d.        | Is there a separate bin / container for hazardous waste (i.e. spill clean-up material)?                                                                                |  |  |  |  |
| e.        | Is waste being disposed of in the correct skip/container (check no hazardous waste is being disposed of in the general waste skip) and are any skips due for emptying? |  |  |  |  |
| f.        | Are batteries stored correctly, under cover and on a concreted surface?                                                                                                |  |  |  |  |
| <b>5.</b> | <b>Storage of Chemicals and oils etc</b>                                                                                                                               |  |  |  |  |
| a.        | Are chemicals / fuels / oil stored and labelled correctly?                                                                                                             |  |  |  |  |
| b.        | Are all fuel tanks labelled with hazard and content labels?                                                                                                            |  |  |  |  |

|           |                                                                                  |  |  |  |  |
|-----------|----------------------------------------------------------------------------------|--|--|--|--|
| c.        | Are all oil / fuel drums stored on bunded trays when not in use?                 |  |  |  |  |
| d.        | Are fuel dispensing pipes in good condition and free from leaks / drips?         |  |  |  |  |
| e.        | Has the monthly tank inspection been undertaken?                                 |  |  |  |  |
| <b>6.</b> | <b>Statutory Nuisances (Dust, Noise, Odours, Fumes, Vibration, pest)</b>         |  |  |  |  |
| a.        | Are all site access roads clear of mud?                                          |  |  |  |  |
| b.        | Is there evidence or potential for windblown dust pollution to escape from site? |  |  |  |  |
| c.        | Are there any odours from waste skips / bins?                                    |  |  |  |  |
| d.        | Have any complaints from neighbours or the local authority been resolved?        |  |  |  |  |
| e.        | Is the site free from obvious pest infestation (vermin, scavengers, wasps etc)?  |  |  |  |  |
| <b>7.</b> | <b>Resource Conservation</b>                                                     |  |  |  |  |
| a.        | Are energy conservation practices adopted (i.e. 'Turn light off' signs) in situ? |  |  |  |  |
| <b>8.</b> | <b>General Site Management</b>                                                   |  |  |  |  |
| a.        | Is site signage clean, in good repair and visible to the public?                 |  |  |  |  |
| b.        | Are gas bottles stored in locked and secure cage?                                |  |  |  |  |
| <b>9.</b> | <b>Aboveground Storage tank(s)</b>                                               |  |  |  |  |
| a.        | Is there a spill response pack and is it fully stocked?                          |  |  |  |  |
| b.        | Is spill response sign legible, undamaged and in a prominent position/           |  |  |  |  |
| c.        | Are fill ports tightly sealed and locked where present                           |  |  |  |  |

|    |                                                                                                                                                   |  |  |  |  |
|----|---------------------------------------------------------------------------------------------------------------------------------------------------|--|--|--|--|
| d. | Are dispenser hoses free from corrosion, deterioration, and leakage                                                                               |  |  |  |  |
| e. | Is the dispense hose functioning correctly?                                                                                                       |  |  |  |  |
| f. | Is the container structure free from damage, leakage?                                                                                             |  |  |  |  |
| g. | Can the tank be secured when not in use?                                                                                                          |  |  |  |  |
| h. | Is the tank(s) protected from collision damage?                                                                                                   |  |  |  |  |
| i. | Is the bund alarm in a serviceable condition?                                                                                                     |  |  |  |  |
| j. | Are all tanks labelled with; <ul style="list-style-type: none"> <li>• Content label</li> <li>• Warning label</li> <li>• Quantity label</li> </ul> |  |  |  |  |
| k. | Are bunds free from litter / water ingress                                                                                                        |  |  |  |  |



**Please Note.**

A shaded cell designates an item in a non-conformance status and that action is required to address a problem. It is expected that the non-conformance will be closed out in a timely manner and before the next monthly inspection is submitted.

Any action that is not closed out will be issued with a non-conformance and a related time limit.

**Environmental Actions from Inspection**

| Key (Priority) |                      |   |           |   |         |
|----------------|----------------------|---|-----------|---|---------|
| 1              | Urgent Action Needed | 2 | Important | 3 | Routine |

| Ref. No | Action Required | Action Taken By (Initial) | Level of Priority * / Date to Act By | Progress Made |
|---------|-----------------|---------------------------|--------------------------------------|---------------|
|         |                 |                           |                                      |               |
|         |                 |                           |                                      |               |
|         |                 |                           |                                      |               |
|         |                 |                           |                                      |               |
|         |                 |                           |                                      |               |
|         |                 |                           |                                      |               |
|         |                 |                           |                                      |               |

Signature \_\_\_\_\_

Date \_\_\_\_\_

Please ensure that the inspection is sent to the Environment & Risk Manager by the last Friday of the month.

Please send to; [Richard.woolley@copart.com](mailto:Richard.woolley@copart.com)





## Appendix 6 – Environmental Risk Assessment

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Copart UK Ltd  
Environmental Management System (EMS)  
ISO 14001:2015

EP-02 Register of significant environmental aspects, impacts  
and Risks

June 2020

| Revision | Date       | Version No | Reason for amendment                                 | Updated by | Signature                                                                            |
|----------|------------|------------|------------------------------------------------------|------------|--------------------------------------------------------------------------------------|
| N/A      | 17/08/2019 | 1          | N/A                                                  | RD Woolley |  |
| 1        | 16/06/2020 | 1.1        | 1. Annual Review and update<br>2. Staff title update | RD Woolley |  |
|          |            |            |                                                      |            |                                                                                      |
|          |            |            |                                                      |            |                                                                                      |
|          |            |            |                                                      |            |                                                                                      |
|          |            |            |                                                      |            |                                                                                      |



## 1.0. Information

The purpose of this register of significant environmental aspects and impacts is as follows;

- To make information available to the senior management team
- To provide a record and understanding of the current environmental aspects at each location and enable updating as required
- To enable screening of the environmental aspects and decisions to be made on the focus of the environmental programmes

## 2.0. Responsibility

The Environment and Risk Manager is responsible for maintaining the register of significant environmental aspects and impacts and updating changes made to it.

## 3.0. Definitions

**Environmental Aspect** – element of Copart’s activities, products, services, and processes that can interact with the environment

**Environmental Impact** – any change to the environment, whether adverse or beneficial, wholly, or partially resulting from Copart’s environmental aspects

## 4.0. Scope

This procedure covers all environmental aspects and impacts undertaken at the following business operating levels which creates, controls or has reasonable influence over.

- Copart storage facilities
- Copart processing and de-pollution facilities
- Copart Corporate facilities

These will also include those;

- Relating to current, past, and proposed future activities
- Occurring under normal, abnormal, or reasonably foreseeable emergency conditions

## 5.0. Procedure

Significance scores are allocated by applying the following guidance:

| Score                         | 1      | 2          | 3      |
|-------------------------------|--------|------------|--------|
| <b>Likelihood / Frequency</b> | Rarely | Occasional | Often  |
| <b>Harm / Danger</b>          | Low    | Medium     | High   |
| <b>Cost</b>                   | <£50k  | >£50k      | >£100k |
| <b>Legal / Regulation</b>     | None   | N/A        | Yes    |
| <b>Controls / Detection</b>   | High   | Medium     | Low    |
| <b>Stakeholder Interest</b>   | Low    | Medium     | High   |

Aspects with a negative impact receive a negative score, and those with a positive impact receive a positive score

A significant score results from multiplying each of the scores allocated for the above 6 criteria. Aspects with positive impacts are highlighted green on the Register of Environmental Aspects & Impacts.

Aspects which score -60 or below are deemed significant.

Significant environmental aspects are highlighted red on the Register of Environmental Aspects and Impacts.

Significant environmental aspects may result in risk or opportunities and are added to the register of environmental contextual issues accordingly.

## 6.0. Environmental Impacts

Further details regarding the environmental impacts referred to in the Register of Environmental Aspects and Impacts is as follows;

| Environmental impact | Details                                                                                                       |
|----------------------|---------------------------------------------------------------------------------------------------------------|
| Air Pollution        | Climate change<br>Ozone depletion<br>Acid rain<br>Local air quality                                           |
| Water pollution      | Harm to aquatic habitats and species, groundwater and drinking water supplies                                 |
| Land Contamination   | Pollution of soils which can directly harm human health, vegetation or be mobilised to surface or groundwater |



Statutory Nuisance

Noise  
Odours  
Light Pollution

Resource depletion

Depletion of finite natural resources, for example, fossil fuels, minerals, fresh water, biodiversity, soil fertility, land

Habitat Destruction

Destruction of natural habitats either directly through greenfield development and intensive grounds maintenance or indirectly through pollution or resource depletion

## 7.0. Review

The register of environmental Aspects and impacts and the significance scoring shall be reviewed and updated at least annually, and also if there is any significant change to equipment, operational processes, legislation, stakeholder interest or in response to any significant incidents.

| Ref. | Aspect                                  | Activity/process                                                | Impact                                                                           | Conditions | Significant Criteria   |               |      |              |                      |                      |                   | Notes                                                                     | Direct / Indirect | Operational Controls                                                                                                                                                                                                     |
|------|-----------------------------------------|-----------------------------------------------------------------|----------------------------------------------------------------------------------|------------|------------------------|---------------|------|--------------|----------------------|----------------------|-------------------|---------------------------------------------------------------------------|-------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|      |                                         |                                                                 |                                                                                  |            | Likelihood / frequency | Harm / Danger | Cost | Legal / Regs | Controls / Detection | Stakeholder Interest | Score             |                                                                           |                   |                                                                                                                                                                                                                          |
| 1.   | Carbon Management – building energy use | HVAC, lighting                                                  | Air pollution<br>Resource depletion<br>Habitat destruction                       | Normal     | 3                      | -2            | 3    | 3            | 1                    | 3                    | -162              | Normal operations                                                         | Indirect          | Carbon & Energy management plan<br>Environmental risk assessment<br>Sustainable procurement policy<br>ITS sustainable procurement<br>Storage quotas<br>Email spam filters<br>Archiving<br>Power-down for network devices |
|      |                                         | Data centres, ICT                                               |                                                                                  | Abnormal   | 2                      | -2            | 2    | 3            | 2                    | 3                    | -144              | Building commissioning<br>Evening / weekend events<br>Heatwave, cold snap |                   |                                                                                                                                                                                                                          |
|      |                                         | Training equipment                                              |                                                                                  | Emergency  | 1                      | -2            | 2    | 3            | 2                    | 3                    | -72               | Controls / equipment failure                                              |                   |                                                                                                                                                                                                                          |
|      |                                         | Space & water heating                                           |                                                                                  |            |                        |               |      |              |                      |                      |                   |                                                                           |                   |                                                                                                                                                                                                                          |
|      |                                         | Building construction & maintenance                             |                                                                                  |            |                        |               |      |              |                      |                      |                   |                                                                           |                   |                                                                                                                                                                                                                          |
| 2.   | Carbon Management – fuel use            | Own fleet – transportation of vehicles                          | Air pollution<br>Statutory nuisance<br>Resource depletion<br>Habitat destruction | Normal     | 3                      | -1            | 1    | 3            | 1                    | 3                    | -27               | Normal operations                                                         | Direct            | MOT<br>Preventative maintenance<br>Driver handbook<br>Driver training                                                                                                                                                    |
|      |                                         | Workshop equipment                                              |                                                                                  | Abnormal   | 1                      | -1            | 1    | 3            | 1                    | 3                    | -9                | Equipment maintenance                                                     |                   |                                                                                                                                                                                                                          |
|      |                                         | Emergency                                                       |                                                                                  | 1          | -2                     | 1             | 3    | 1            | 3                    | -18                  | Equipment failure |                                                                           |                   |                                                                                                                                                                                                                          |
| 3.   | Carbon Management – travel              | Staff business travel, staff commuting                          | Air pollution<br>Resource depletion<br>Habitat destruction                       | Normal     | 3                      | -2            | 3    | 3            | 1                    | 3                    | -162              | Normal operations                                                         | Indirect          | Staff travel plans                                                                                                                                                                                                       |
|      |                                         |                                                                 |                                                                                  | Abnormal   | 2                      | -2            | 3    | 3            | 1                    | 3                    | -108              | Conferences / Events                                                      |                   |                                                                                                                                                                                                                          |
|      |                                         |                                                                 |                                                                                  | Emergency  | N/A                    |               |      |              |                      |                      | 0                 | N/A                                                                       |                   |                                                                                                                                                                                                                          |
| 4.   | Water use                               | Building cleaning                                               | Resource depletion<br>Water pollution<br>Habitat destruction                     | Normal     | 3                      | -1            | 1    | 1            | 1                    | 3                    | -9                | Normal operations                                                         | Direct            | Contractors induction<br>Environmental risk assessment<br>SWOP<br>Driver / yard operative training                                                                                                                       |
|      |                                         |                                                                 |                                                                                  | Abnormal   | 2                      | -1            | 1    | 1            | 1                    | 3                    | -6                | Equipment maintenance                                                     |                   |                                                                                                                                                                                                                          |
|      |                                         |                                                                 |                                                                                  | Emergency  | 2                      | -1            | 1    | 1            | 3                    | 3                    | -18               | Equipment failure / drought order declared / burst pipe                   |                   |                                                                                                                                                                                                                          |
|      |                                         | Building construction & maintenance                             |                                                                                  | Normal     | 2                      | -1            | 1    | 1            | 1                    | 3                    | -6                | Normal operations                                                         |                   |                                                                                                                                                                                                                          |
|      |                                         |                                                                 |                                                                                  | Abnormal   | 2                      | -1            | 1    | 1            | 1                    | 3                    | -6                | Equipment maintenance                                                     |                   |                                                                                                                                                                                                                          |
|      |                                         |                                                                 |                                                                                  | Emergency  | 1                      | -2            | 1    | 1            | 2                    | 3                    | -12               | Equipment failure / drought order declared / burst pipe                   |                   |                                                                                                                                                                                                                          |
|      |                                         | Facility maintenance<br>Fleet wash down<br>Lot Vehicle cleaning |                                                                                  | Normal     | 3                      | -2            | 1    | 1            | 1                    | 3                    | -9                | Normal operations                                                         |                   |                                                                                                                                                                                                                          |
|      |                                         |                                                                 |                                                                                  | Abnormal   | 2                      | -2            | 1    | 1            | 1                    | 3                    | -6                | Equipment maintenance                                                     |                   |                                                                                                                                                                                                                          |
|      |                                         |                                                                 |                                                                                  | Emergency  | 1                      | -1            | 1    | 1            | 3                    | 3                    | -18               | Equipment failure / drought order declared                                |                   |                                                                                                                                                                                                                          |
|      |                                         | Buildings domestic use                                          |                                                                                  | Normal     | 3                      | -2            | 2    | 3            | 1                    | 3                    | -108              | Normal operations                                                         |                   |                                                                                                                                                                                                                          |
|      |                                         |                                                                 |                                                                                  | Abnormal   | 2                      | -2            | 2    | 3            | 1                    | 3                    | -72               | Equipment maintenance                                                     |                   |                                                                                                                                                                                                                          |
|      |                                         |                                                                 |                                                                                  | Emergency  | 1                      | -2            | 2    | 3            | 3                    | 3                    | -108              | Equipment failure / drought order declared                                |                   |                                                                                                                                                                                                                          |
| 5.   | Purchasing                              | Paper                                                           | Resource depletion<br>Habitat destruction<br>End-of-life treatment & disposal    | Normal     | 3                      | -2            | 3    | 1            | 2                    | 3                    | -108              | Normal operations                                                         | Indirect          | Sustainable procurement policy<br>Working procedures<br>Training                                                                                                                                                         |
|      |                                         | Stationery supplies                                             |                                                                                  | Abnormal   | N/A                    |               |      |              |                      |                      | 0                 | N/A                                                                       |                   |                                                                                                                                                                                                                          |
|      |                                         |                                                                 |                                                                                  | Emergency  | N/A                    |               |      |              |                      |                      | 0                 | N/A                                                                       |                   |                                                                                                                                                                                                                          |
|      |                                         | Furniture                                                       |                                                                                  | Normal     | 2                      | -2            | 3    | 1            | 1                    | 3                    | -36               |                                                                           |                   |                                                                                                                                                                                                                          |
|      |                                         |                                                                 |                                                                                  | Abnormal   | N/A                    |               |      |              |                      |                      | 0                 | N/A                                                                       |                   |                                                                                                                                                                                                                          |
|      |                                         |                                                                 |                                                                                  | Emergency  | N/A                    |               |      |              |                      |                      | 0                 |                                                                           |                   |                                                                                                                                                                                                                          |
|      |                                         | Printed publications                                            |                                                                                  | Normal     | 3                      | -2            | 3    | 1            | 1                    | 3                    | -54               |                                                                           |                   |                                                                                                                                                                                                                          |
|      |                                         |                                                                 |                                                                                  | Abnormal   |                        |               |      |              |                      |                      | 0                 | N/A                                                                       |                   |                                                                                                                                                                                                                          |
|      |                                         |                                                                 |                                                                                  | Emergency  |                        |               |      |              |                      |                      | 0                 |                                                                           |                   |                                                                                                                                                                                                                          |
|      |                                         | ICT equipment                                                   |                                                                                  | Normal     | 3                      | -2            | 3    | 1            | 1                    | 3                    | -54               |                                                                           |                   |                                                                                                                                                                                                                          |
|      |                                         |                                                                 |                                                                                  | Abnormal   | N/A                    |               |      |              |                      |                      | 0                 | N/A                                                                       |                   |                                                                                                                                                                                                                          |
|      |                                         |                                                                 |                                                                                  | Emergency  | N/A                    |               |      |              |                      |                      | 0                 |                                                                           |                   |                                                                                                                                                                                                                          |
|      |                                         | Clothing, uniforms & PPE                                        |                                                                                  | Normal     | 1                      | -1            | 1    | 1            | 1                    | 3                    | -3                |                                                                           |                   |                                                                                                                                                                                                                          |
|      |                                         |                                                                 |                                                                                  | Abnormal   | N/A                    |               |      |              |                      |                      | 0                 | N/A                                                                       |                   |                                                                                                                                                                                                                          |
|      |                                         |                                                                 |                                                                                  | Emergency  | N/A                    |               |      |              |                      |                      | 0                 |                                                                           |                   |                                                                                                                                                                                                                          |
|      |                                         | Yard supplies                                                   |                                                                                  | Normal     | 3                      | 1             | 3    | 1            | 2                    | 3                    | -54               |                                                                           |                   |                                                                                                                                                                                                                          |
|      |                                         |                                                                 |                                                                                  | Abnormal   | N/A                    |               |      |              |                      |                      | 0                 | N/A                                                                       |                   |                                                                                                                                                                                                                          |
|      |                                         |                                                                 |                                                                                  | Emergency  | N/A                    |               |      |              |                      |                      | 0                 |                                                                           |                   |                                                                                                                                                                                                                          |

|      |                                                | Building maintenance, materials & equipment                               |                                                                                                     | Normal     | 2                      | -2            | 3    | 1            | 1                    | 3                    | -36                                              | N/A                                               |                      |                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|------|------------------------------------------------|---------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------|------------|------------------------|---------------|------|--------------|----------------------|----------------------|--------------------------------------------------|---------------------------------------------------|----------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|      |                                                |                                                                           |                                                                                                     | Abnormal   |                        |               |      |              |                      |                      | 0                                                |                                                   |                      |                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|      |                                                |                                                                           |                                                                                                     | Emergency  |                        |               |      |              |                      |                      | 0                                                |                                                   |                      |                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| Ref. | Aspect                                         | Activity / process                                                        | Impact                                                                                              | Conditions | Significance Criteria  |               |      |              |                      |                      | Notes                                            | Direct / Indirect                                 | Operational Controls |                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|      |                                                |                                                                           |                                                                                                     |            | Likelihood / Frequency | Harm / Danger | Cost | Legal / Regs | Controls / Detectors | Stakeholder interest |                                                  |                                                   |                      | Score                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 6.   | CFCs / ODSs                                    | Air conditioning                                                          | Air pollution                                                                                       | Normal     | 3                      | -1            | 1    | 3            | 2                    | 1                    | -18                                              | Normal operations                                 | Direct               | F Gas register, leak testing, annual servicing, AC inspections                                                                                                                                                                                                                                                                                                                                                                       |
|      |                                                | Fire suppression systems                                                  | Abnormal                                                                                            | 2          | -2                     | 1             | 3    | 3            | 1                    | -36                  | Equipment maintenance                            |                                                   |                      |                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|      |                                                | Refrigeration                                                             | Emergency                                                                                           | 1          | -3                     | 1             | 3    | 3            | 1                    | -27                  | Leakage of refrigerants if not handled correctly |                                                   |                      |                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 7.   | Hazardous substances (storage, use & handling) | SVO & on-site workshops, oil, fuels, paints, adhesives                    | Water pollution<br>Land contamination<br>Habitat destruction                                        | Normal     | 3                      | -1            | 1    | 3            | 2                    | 1                    | -18                                              | Normal operations                                 | Direct               | H&S Management system<br>Asbestos register<br>Site operational risk register<br>Work instructions;<br>Storage of fuels, oils & chemicals<br>Oil and chemical spillage procedure<br>Procedure of using spill kits<br>Local risk assessments<br>Shared service contracts<br>COSHH register<br>Driver training<br>Yard operative training<br>Fuel dispensing training<br>PPE<br>Annual service<br>Drip trays<br>Weekly site inspections |
|      |                                                |                                                                           |                                                                                                     | Abnormal   | 2                      | -3            | 1    | 3            | 2                    | 1                    | -36                                              | Refuelling, maintenance                           |                      |                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|      |                                                |                                                                           |                                                                                                     | Emergency  | 1                      | -3            | 1    | 3            | 2                    | 1                    | -18                                              | Uncontrolled release                              |                      |                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|      |                                                | Yard maintenance, oil, fuel, pesticides & herbicides                      |                                                                                                     | Normal     | 2                      | -1            | 1    | 3            | 1                    | 1                    | -6                                               | Normal operation                                  |                      |                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|      |                                                |                                                                           |                                                                                                     | Abnormal   | 2                      | -2            | 1    | 3            | 1                    | 1                    | -12                                              | Refuelling, equipment maintenance                 |                      |                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|      |                                                |                                                                           |                                                                                                     | Emergency  | 1                      | -3            | 1    | 3            | 1                    | 1                    | -9                                               | Uncontrolled release                              |                      |                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|      |                                                | Building cleaning, solvents, bleaches, aerosols, chemicals                |                                                                                                     | Normal     | 2                      | -1            | 1    | 3            | 1                    | 1                    | -6                                               | Normal operation                                  |                      |                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|      |                                                |                                                                           |                                                                                                     | Abnormal   | 2                      | -2            | 1    | 3            | 1                    | 1                    | -12                                              | Equipment maintenance                             |                      |                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|      |                                                |                                                                           |                                                                                                     | Emergency  | 1                      | -2            | 1    | 3            | 1                    | 1                    | -6                                               | Uncontrolled release                              |                      |                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|      |                                                | Wash bay, chemicals                                                       |                                                                                                     | Normal     | 1                      | -1            | 1    | 1            | 2                    | 1                    | -2                                               | Normal operation                                  |                      |                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|      |                                                |                                                                           |                                                                                                     | Abnormal   | 1                      | -2            | 1    | 3            | 1                    | 1                    | -6                                               | Refuelling, maintenance                           |                      |                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|      |                                                |                                                                           |                                                                                                     | Emergency  | 2                      | -3            | 1    | 3            | 1                    | 1                    | -18                                              | Uncontrolled release                              |                      |                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|      |                                                | Vehicle storage, oil, fuels                                               |                                                                                                     | Normal     | 2                      | -1            | 1    | 3            | 1                    | 1                    | -6                                               | Normal operations                                 |                      |                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|      |                                                |                                                                           |                                                                                                     | Abnormal   | 1                      | -1            | 1    | 3            | 1                    | 1                    | -3                                               | Equipment maintenance, contaminated vehicle       |                      |                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|      |                                                | Fuel deliveries & storage                                                 |                                                                                                     | Emergency  | 1                      | -2            | 1    | 3            | 3                    | 1                    | -18                                              | Equipment failure, uncontrolled release           |                      |                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 8.   | Fire                                           | Fire safety                                                               | Air pollution<br>Water pollution<br>Land contamination<br>Resource depletion<br>Habitat destruction | Normal     |                        |               |      |              |                      |                      | 0                                                | Normal operations                                 | Direct               | General workplace inspections<br>Statutory & critical equipment inspection<br>Annual PAT testing<br>Fire Marshalls<br>Local fire risk assessments<br>Local Fire prevention plan<br>Internal audits<br>Scheduled fire system maintenance<br>Annual system testing & service<br>Scheduled fire alarm testing<br>Scheduled fire drills                                                                                                  |
|      |                                                |                                                                           |                                                                                                     | Abnormal   | N/A                    |               |      |              |                      |                      | 0                                                | Abnormal operations                               |                      |                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|      |                                                |                                                                           |                                                                                                     | Emergency  | 1                      | -2            | 1    | 3            | 1                    | 2                    | -12                                              | Emergency fire incident                           |                      |                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|      |                                                |                                                                           |                                                                                                     |            |                        |               |      |              |                      |                      |                                                  |                                                   |                      |                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 9.   | Land Contamination                             | Building maintenance                                                      | Water pollution<br>Land pollution<br>Habitat destruction                                            | Normal     | 1                      | -1            | 1    | 3            | 1                    | 1                    | -3                                               | Facility construction / extension                 | Direct               | Due diligence<br>Site operational risk register<br>Shared user agreements<br>Work instructions<br>Spill response procedure<br>Spill kits                                                                                                                                                                                                                                                                                             |
|      |                                                | Property acquisition                                                      |                                                                                                     | Abnormal   | 1                      | -2            | 1    | 3            | 1                    | 1                    | -6                                               | Uncontrolled mobilisation of land contamination   |                      |                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|      |                                                | Vehicle storage                                                           |                                                                                                     | Emergency  | N/A                    |               |      |              |                      |                      |                                                  |                                                   |                      |                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 10.  | Emissions to water                             | Yard construction & maintenance                                           | Water pollution<br>Land contamination<br>Habitat destruction                                        | Normal     | 3                      | -2            | 1    | 3            | 2                    | 1                    | -36                                              | Normal operations                                 | Direct               | Site operational risk register<br>Oil interceptor maintenance<br>Work instructions<br>Waste management<br>Hazardous waste management<br>Storage of fuels, oils & chemicals<br>Oil and chemical spill procedure                                                                                                                                                                                                                       |
|      |                                                |                                                                           |                                                                                                     | Abnormal   | 2                      | -2            | 1    | 3            | 2                    | 2                    | -48                                              | Equipment maintenance                             |                      |                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|      |                                                |                                                                           |                                                                                                     | Emergency  | 1                      | -3            | 1    | 3            | 1                    | 2                    | -18                                              | Uncontrolled release                              |                      |                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|      |                                                | Car parks, vehicle storage, deliveries, site drainage<br>Vehicle cleaning |                                                                                                     | Normal     | 3                      | -2            | 1    | 3            | 1                    | 1                    | -18                                              | Normal release to foul sewer with oil interceptor |                      |                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|      |                                                |                                                                           |                                                                                                     | Abnormal   | 1                      | -2            | 1    | 3            | 1                    | 1                    | -6                                               | Vehicle / equipment wash down                     |                      |                                                                                                                                                                                                                                                                                                                                                                                                                                      |

|     |                                    |                                                                                                                                            |                                                                                                                           | Emergency  | 2                      | -2            | 1    | 3            | 1                    | 1                    | -12   | Uncontrolled release, spillage                     |                   | Procedure for using spill kits                               |
|-----|------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------|------------|------------------------|---------------|------|--------------|----------------------|----------------------|-------|----------------------------------------------------|-------------------|--------------------------------------------------------------|
|     |                                    | Buildings domestic water effluent                                                                                                          |                                                                                                                           | Normal     | 3                      | -1            | 1    | 3            | 1                    | 1                    | -9    | Normal release to foul sewer                       |                   |                                                              |
|     |                                    |                                                                                                                                            |                                                                                                                           | Abnormal   | N/A                    |               |      |              |                      |                      | 0     | N/A                                                |                   |                                                              |
|     |                                    |                                                                                                                                            |                                                                                                                           | Emergency  | N/A                    |               |      |              |                      |                      | 0     | N/A                                                |                   |                                                              |
| 11. | Noise, nuisance & emissions to air | Building maintenance – dust emissions, paint & varnish fumes                                                                               | Air pollution<br>Statutory nuisance                                                                                       | Normal     | 3                      | -1            | 1    | 3            | 2                    | 3                    | -54   | Normal operations                                  | Direct            | Site operations risk register                                |
|     |                                    |                                                                                                                                            |                                                                                                                           | Abnormal   | 2                      | -2            | 1    | 3            | 3                    | 3                    | -108  | Building works                                     |                   | H&S Management system                                        |
|     |                                    |                                                                                                                                            |                                                                                                                           | Emergency  | 1                      | -3            | 1    | 3            | 3                    | 3                    | -81   | Uncontrolled release                               |                   | Contractors induction                                        |
|     |                                    |                                                                                                                                            |                                                                                                                           |            |                        |               |      |              |                      |                      |       |                                                    |                   | LEV Maintenance register                                     |
| Ref | Aspect                             | Activity / Process                                                                                                                         | Impact                                                                                                                    | Conditions | Significance Criteria  |               |      |              |                      |                      | Score | Notes                                              | Direct / Indirect | Operational Controls                                         |
|     |                                    |                                                                                                                                            |                                                                                                                           |            | Likelihood / Frequency | Harm / Danger | Cost | Legal / Regs | Controls / Detection | Stakeholder interest |       |                                                    |                   |                                                              |
|     |                                    | LEV & fume cupboards – extraction of internal dust, fumes or odour to external vents                                                       | Air pollution<br>Statutory nuisance                                                                                       | Normal     | 3                      | -1            | 1    | 3            | 1                    | 2                    | -18   | Normal operations                                  | Direct            | H&S management systems                                       |
|     |                                    |                                                                                                                                            |                                                                                                                           | Abnormal   | 2                      | -1            | 1    | 3            | 1                    | 2                    | -12   | Equipment maintenance                              |                   | Site operations risk register                                |
|     |                                    |                                                                                                                                            |                                                                                                                           | Emergency  | 1                      | -2            | 1    | 3            | 2                    | 2                    | -24   | Equipment failure                                  |                   | H&S Management system                                        |
|     |                                    | Yard operations – use of plant and transporters                                                                                            |                                                                                                                           | Normal     | 2                      | -1            | 1    | 3            | 1                    | 2                    | -12   | Normal Operations                                  |                   | Contractors induction                                        |
|     |                                    |                                                                                                                                            |                                                                                                                           | Abnormal   | 1                      | -1            | 1    | 3            | 1                    | 2                    | -6    | Equipment maintenance                              |                   | LEV Maintenance register                                     |
|     |                                    |                                                                                                                                            |                                                                                                                           | Emergency  | 1                      | -2            | 1    | 3            | 1                    | 2                    | -12   | Equipment failure                                  |                   |                                                              |
|     |                                    | Generators, compressors & other motorised equipment                                                                                        |                                                                                                                           | Normal     | 2                      | -1            | 1    | 3            | 1                    | 3                    | -18   | Normal operations                                  |                   |                                                              |
|     |                                    |                                                                                                                                            |                                                                                                                           | Abnormal   | 1                      | -1            | 1    | 3            | 1                    | 3                    | -9    | Equipment maintenance                              |                   |                                                              |
|     |                                    |                                                                                                                                            |                                                                                                                           | Emergency  | 1                      | -2            | 1    | 3            | 1                    | 3                    | -18   | Equipment failure                                  |                   |                                                              |
| 12. | Biodiversity                       | Facility expansion & maintenance                                                                                                           | Habitat destruction                                                                                                       | Normal     | 1                      | -2            | 1    | 3            | 1                    | 2                    | -12   | Normal operations                                  | Direct            | Site operational risk assessment                             |
|     |                                    |                                                                                                                                            |                                                                                                                           | Abnormal   | N/A                    |               |      |              |                      |                      | 0     | N/A                                                |                   | Contractors induction                                        |
|     |                                    |                                                                                                                                            |                                                                                                                           | Emergency  | N/A                    |               |      |              |                      |                      | 0     | N/A                                                |                   | Environmental risk assessment                                |
|     |                                    | Protect habitats & species on our sites identified as significant:<br>1. Newbury<br>2. Bristol                                             |                                                                                                                           | Normal     | 3                      | 2             | 1    | 3            | 1                    | 2                    | 36    | Normal operations                                  |                   | Green team                                                   |
|     |                                    |                                                                                                                                            |                                                                                                                           | Abnormal   | N/A                    |               |      |              |                      |                      | 0     | N/A                                                |                   |                                                              |
|     |                                    |                                                                                                                                            |                                                                                                                           | Emergency  | N/A                    |               |      |              |                      |                      | 0     | N/A                                                |                   |                                                              |
| 13. | Environmental education & research | Education for sustainability                                                                                                               | Air pollution<br>Water pollution<br>Land contamination<br>Statutory nuisance<br>Resource depletion<br>Habitat destruction | Normal     | 3                      | 2             | 1    | 1            | 1                    | 2                    | 12    | Normal operations                                  | Direct            | Education for Sustainability strategy                        |
|     |                                    | Staff training & awareness raising                                                                                                         |                                                                                                                           | Abnormal   | N/A                    |               |      |              |                      |                      | 0     | N/A                                                |                   | Staff environmental awareness training                       |
|     |                                    |                                                                                                                                            |                                                                                                                           | Emergency  | N/A                    |               |      |              |                      |                      | 0     | N/A                                                |                   | Staff inductions                                             |
| 14. | Wastes                             | General waste & recycling                                                                                                                  | Resource depletion<br>Air pollution<br>Water pollution<br>Statutory nuisance<br>Habitat destruction                       | Normal     | 3                      | -2            | 2    | 3            | 1                    | 3                    | -108  | Normal operations                                  | Direct            | Confidential, sanitary, hazardous and WEEE waste collections |
|     |                                    |                                                                                                                                            |                                                                                                                           | Abnormal   | 2                      | -2            | 1    | 3            | 1                    | 3                    | -36   | Full site clean up                                 |                   | Contractors induction                                        |
|     |                                    |                                                                                                                                            |                                                                                                                           | Emergency  | 1                      | -2            | 1    | 3            | 2                    | 3                    | -36   | Unexpected high volumes, reallocation of postcodes |                   | Environmental risk assessment                                |
|     |                                    | Construction & maintenance                                                                                                                 |                                                                                                                           | Normal     | 3                      | -2            | 1    | 3            | 3                    | 3                    | -162  | Normal operations                                  |                   | Work instructions                                            |
|     |                                    |                                                                                                                                            |                                                                                                                           | Abnormal   | 2                      | -2            | 1    | 3            | 3                    | 3                    | -108  | Refurbishment, expansion                           |                   | Waste management                                             |
|     |                                    |                                                                                                                                            |                                                                                                                           | Emergency  | 1                      | -2            | 1    | 3            | 3                    | 3                    | -54   | Unplanned, waste management plans not followed     |                   | Hazardous waste management                                   |
|     |                                    | Confidential waste                                                                                                                         |                                                                                                                           | Normal     | 3                      | -1            | 1    | 3            | 1                    | 3                    | -27   | Normal operations                                  |                   | Oil and chemical spill procedure                             |
|     |                                    |                                                                                                                                            |                                                                                                                           | Abnormal   | 2                      | -1            | 1    | 3            | 1                    | 3                    | -18   | Archiving clearance                                |                   | Procedure for using spill kits                               |
|     |                                    |                                                                                                                                            |                                                                                                                           | Emergency  | N/A                    |               |      |              |                      |                      | 0     | N/A                                                |                   | Sustainable procurement policy                               |
|     |                                    | Sanitary waste                                                                                                                             |                                                                                                                           | Normal     | 3                      | -1            | 1    | 3            | 1                    | 3                    | -27   | Normal operations                                  |                   | Staff inductions                                             |
|     |                                    |                                                                                                                                            |                                                                                                                           | Abnormal   | N/A                    |               |      |              |                      |                      | 0     |                                                    |                   | Toolbox talks                                                |
|     |                                    |                                                                                                                                            |                                                                                                                           | Emergency  | N/A                    |               |      |              |                      |                      | 0     |                                                    |                   |                                                              |
|     |                                    | Hazardous waste<br>Chemical<br>Cat A&B vehicles<br>Depollution oils / fluids<br>On-site workshop oils / fluids<br>Spill clean-up materials |                                                                                                                           | Normal     | 2                      | -2            | 1    | 3            | 1                    | 3                    | -36   | Normal operations                                  |                   |                                                              |
|     |                                    |                                                                                                                                            |                                                                                                                           | Abnormal   | 2                      | -3            | 1    | 3            | 1                    | 3                    | -54   | Deliveries                                         |                   |                                                              |
|     |                                    |                                                                                                                                            |                                                                                                                           | Emergency  | 1                      | -3            | 1    | 3            | 1                    | 3                    | -27   | Uncontrolled release                               |                   |                                                              |
|     |                                    | WEEE waste                                                                                                                                 |                                                                                                                           | Normal     | 3                      | -2            | 1    | 3            | 1                    | 3                    | -54   | Normal operations                                  |                   |                                                              |
|     |                                    |                                                                                                                                            |                                                                                                                           | Abnormal   | 2                      | -2            | 1    | 3            | 2                    | 3                    | -72   | Refurbishment period                               |                   |                                                              |

|  |  |                       |           |     |    |   |   |   |   |      |                                                     |  |  |
|--|--|-----------------------|-----------|-----|----|---|---|---|---|------|-----------------------------------------------------|--|--|
|  |  |                       | Emergency | 2   | -2 | 1 | 3 | 3 | 3 | -108 | Unplanned, waste management procedures not followed |  |  |
|  |  | Furniture & equipment | Normal    | 3   | -1 | 1 | 3 | 1 | 3 | -27  | Normal operations                                   |  |  |
|  |  |                       | Abnormal  | 2   | -1 | 1 | 3 | 2 | 3 | -36  | End of life clearance / refurbishment               |  |  |
|  |  |                       | Emergency | N/A |    |   |   |   |   | 0    | N/A                                                 |  |  |



## Appendix 7 – Complaint Form

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Copart UK Ltd  
Environmental Management System (EMS)  
ISO 14001:2015

Environmental Complaint Handling

December 2019

| Revision | Date       | Version No | Reason for amendment | Updated by | Signature                                                                            |
|----------|------------|------------|----------------------|------------|--------------------------------------------------------------------------------------|
| N/A      | 30/12/2019 | 1          | N/A                  | RD Woolley |  |
|          |            |            |                      |            |                                                                                      |
|          |            |            |                      |            |                                                                                      |
|          |            |            |                      |            |                                                                                      |
|          |            |            |                      |            |                                                                                      |
|          |            |            |                      |            |                                                                                      |



## Environmental Complaint Handling

---

### What is this?

This is a written procedure that outlines how complaints regarding environmental issues relating to the company's activities are handled.

---

### What does the responsible manager have to do?

The responsible manager must ensure that:

- All complaints are taken seriously and dealt with appropriately
  - Any immediate actions required are implemented
  - All complaints are investigated, to identify the remedial actions required, the root cause, and preventative measures necessary to avoid recurrence
  - Further investigation, any actions requiring approval are addressed promptly and actioned in a timely manner
  - A record is made of all complaints, along with any response and / or action taken
  - Periodically, the complaints records are reviewed to identify any trends, and appropriate steps required
- 

### What do employees have to do?

All employees must:

- Report any complaint that is received to the responsible manager immediately
- Report any incident which may cause a nuisance, or give rise to a complaint, to the responsible manager immediately

## ENVIRONMENTAL INCIDENT & COMPLAINT REPORTING FORMS

### Filling in this form

- **Part A** of this form is to be **completed** with the full details of the person making the complaint

| PART A: DETAILS OF PERSON (S) MAKING COMPLAINT        |                                                                                      |                    |  |        |
|-------------------------------------------------------|--------------------------------------------------------------------------------------|--------------------|--|--------|
| 1                                                     | Full name of Complainant                                                             |                    |  |        |
| 2                                                     | Contact Address                                                                      |                    |  |        |
| 3                                                     | Contact Number                                                                       |                    |  |        |
| PART B: TO BE COMPLETED BY SITE MANAGER               |                                                                                      |                    |  |        |
| 4                                                     | Full Name                                                                            |                    |  |        |
| 5                                                     | Job Title                                                                            |                    |  |        |
| 6                                                     | Was this incident reported directly to you?                                          | Yes                |  | No     |
| <i>If no, state capacity in completing this form:</i> |                                                                                      |                    |  |        |
| 7                                                     | Who else was involved? [✓]                                                           | None               |  | Staff  |
|                                                       |                                                                                      | Contractor         |  | Public |
|                                                       |                                                                                      | Public             |  | Other  |
| 8                                                     | Date and time of incident                                                            | Date               |  | Time   |
| 9                                                     | Please provide a brief description (i.e. summary of what occurred)                   |                    |  |        |
|                                                       |                                                                                      |                    |  |        |
| 10                                                    | Would you describe it as: [✓]                                                        | An incident        |  |        |
|                                                       |                                                                                      | Near miss          |  |        |
|                                                       |                                                                                      | Legislative breach |  |        |
|                                                       |                                                                                      | Pollution incident |  |        |
| 11                                                    | How would you summarise the occurrence? [✓]                                          |                    |  |        |
|                                                       | Fire or explosion                                                                    |                    |  |        |
|                                                       | Spillage or leak of substances other than special/hazardous                          |                    |  |        |
|                                                       | Spillage of special, hazardous or restricted substances (e.g. oil, detergent, paint) |                    |  |        |
|                                                       | Emission to air of gas, dust, fumes or other pollutants                              |                    |  |        |
|                                                       | Pollution of water courses, surface water drains, foul water sewers                  |                    |  |        |

|                                                                        |                                                                                                                                                                                                                                                                                                                                                                   |                    |                                |  |
|------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------|--------------------------------|--|
|                                                                        | Contamination of land, flora, fauna                                                                                                                                                                                                                                                                                                                               |                    |                                |  |
|                                                                        | Noise, litter, light, odour, vibration or other nuisance                                                                                                                                                                                                                                                                                                          |                    |                                |  |
|                                                                        | Waste management (escape or improper storage/disposal)                                                                                                                                                                                                                                                                                                            |                    |                                |  |
|                                                                        | Human health and safety                                                                                                                                                                                                                                                                                                                                           |                    |                                |  |
|                                                                        | Other risk: (please describe)                                                                                                                                                                                                                                                                                                                                     |                    |                                |  |
|                                                                        | <b>Further details:</b> Please give as much detail as you can. For instance, the name of any substances involved, what happened leading up to the event, the part played by any people including third parties, the names of any witnesses, any action taken at the time of the event. (Continue on a separate piece of paper, or enlarge this box, if required). |                    |                                |  |
|                                                                        |                                                                                                                                                                                                                                                                                                                                                                   |                    |                                |  |
| Signed:                                                                |                                                                                                                                                                                                                                                                                                                                                                   | Date of completion |                                |  |
|                                                                        | After completion of <b>PART A &amp; B</b> : Photocopy this form twice (unless sending by email). Send the ORIGINAL form to the Environmental Manager. Retain one COPY for your own records                                                                                                                                                                        |                    |                                |  |
| <b>PART C:</b><br><b>(for completion by the Environmental Manager)</b> |                                                                                                                                                                                                                                                                                                                                                                   |                    |                                |  |
| 1                                                                      | Preventative or corrective action(s) identified and agreed                                                                                                                                                                                                                                                                                                        |                    |                                |  |
|                                                                        |                                                                                                                                                                                                                                                                                                                                                                   |                    |                                |  |
| 2                                                                      | What are the actual or foreseeable potential consequences known at this time? [✓]                                                                                                                                                                                                                                                                                 |                    |                                |  |
|                                                                        | Clean-up/Restoration                                                                                                                                                                                                                                                                                                                                              |                    | Breach of Licence Requirements |  |
|                                                                        | Adverse Customer Reaction                                                                                                                                                                                                                                                                                                                                         |                    | Habitat or Species             |  |
|                                                                        | Contamination of Water                                                                                                                                                                                                                                                                                                                                            |                    | Health Effects                 |  |
|                                                                        | Adverse Publicity/Reaction                                                                                                                                                                                                                                                                                                                                        |                    | Enforcement Notice             |  |
|                                                                        | Prosecution                                                                                                                                                                                                                                                                                                                                                       |                    | Civil Claim                    |  |
| 3                                                                      | Signed                                                                                                                                                                                                                                                                                                                                                            |                    | Date of implementation         |  |
|                                                                        | Position                                                                                                                                                                                                                                                                                                                                                          |                    |                                |  |

**PART D:**  
**(for completion by the EMS manager)**

|   |                                                                                                                                                       |  |                        |  |
|---|-------------------------------------------------------------------------------------------------------------------------------------------------------|--|------------------------|--|
| 1 | <b>VERIFICATION</b> Give information on the verification process, include details of any checks carried out, and reference any audit checklists used. |  |                        |  |
| 2 | Signed                                                                                                                                                |  | Date of implementation |  |
|   | Position                                                                                                                                              |  |                        |  |

**INCIDENT CLOSURE:**

|  |          |  |                        |  |
|--|----------|--|------------------------|--|
|  | Signed   |  | Date of implementation |  |
|  | Position |  |                        |  |



## Appendix 8 – Spill Management Process

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# Sub Contractor Spill Management

It is a legal requirement to clean up any spill as part of Copart's business activities. If you are in possession of a spill kit, please follow the instruction as below, otherwise, report to site staff when you arrive at the Copart site.

## 1. Assess the risk

Before you take action, make sure the scene is safe to proceed. Determine the source of the spill, the product(s) involved and protect yourself from any hazards that may be present.

## 2. Protect

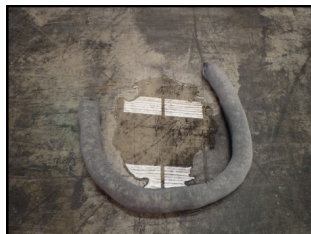
Choose the proper PPE and equipment to safely respond

## 3. Stop

Prevent any further material spilling if safe to do so, e.g pinch or bend pipes and cable tie closed

## 4. Spill Containment

Use absorbent socks (Booms), pads to contain the spill to the immediate area. Prevent spilled product from entering waterways, storm drains, sewers, floor drains, etc.



## 5. Recover Spilled Material

Use absorbent products (pads & booms) found in your spill kit to recover all free liquids and thoroughly clean the area.



## 6. Collect and Package Absorbents

Gather used absorbents and other contaminated materials and place into temporary disposal bags. Secure with cable tie and store safely until return to the OC and ask site staff to dispose



## 7. Proper Waste Storage and Disposal

Used absorbents, contaminated material and other waste products must be stored and disposed of in accordance to local regulations. Place into Hazardous waste storage container at OC. If you are unsure where this is located, please ask your line manager

## Information

**1: Inspect the vehicle at the point of collection to ensure that the vehicle is not leaking fluids / liquids**

**2: If leak discovered, managed spill for transit**

**3: Report to site staff the vehicle lot number and location to so that the spill can be managed in a timely manner to minimise the risk of pollution**



**Copart UK Limited**

**Bristol - 0844 856 6649**

# Spill Kit User Instructions

It is a legal requirement to clean up any spill as part of Copart's business activities, in order to deal with a spill, always follow policies and procedures and consult your line manager if you have any questions or concerns.

## 1. Assess the risk

Before you take action, make sure the scene is safe to proceed. Determine the source of the spill, the product(s) involved and protect yourself from any hazards that may be present.

## 2. Protect

Choose the proper PPE and equipment to safely respond

## 3. Stop

Prevent any further material spilling if safe to do so, e.g stand oil drum up, close valves etc on fuel tanks

## 4. Spill Containment

Use absorbent socks (Booms), pads to contain the spill to the immediate area. Prevent spilled product from entering waterways, storm drains, sewers, floor drains, etc.



## 5. Recover Spilled Material

Use absorbent products (pads & booms) found in your spill kit to recover all free liquids and thoroughly clean the area.



## 6. Collect and Package Absorbents

Gather used absorbents and other contaminated materials and place into temporary disposal bags. Secure with cable tie and store safely until return to the OC



## 7. Proper Waste Storage and Disposal

Used absorbents, contaminated material and other waste products must be stored and disposed of in accordance to local regulations. Place into Hazardous waste storage container at OC. If you are unsure where this is located, please ask your line manager

## 8. Replace or Restock Spill Kit

Immediately replace or restock used spill kit components to ensure preparedness should another spill occur;

Min 10 x spill pads  
Mins 4 x booms  
2 x disposable bag  
2 x cable tie  
Chemical spill kit



**Copart UK Limited**



## Appendix 9 – Flood Risk Map

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Map Perygl Llifogydd / Flood Risk Map -

Allwedd / Map Key

Zone C1

Zone C2

Zone B

Zone A

Graddfa / Scale at A3 1: 25,000

Dyddiad / Date  
13/11/2020

