Environmental Management System (EMS) for Prichard Remediation Ltd.

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1.0. Introduction

The EMS produced for Prichard Remediation Ltd is designed for use with mobile plant permit SR2008No27 and the applied for bespoke variation. This EMS is only applicable for the activities that are to be undertaken through deployments issued by Natural Resources Wales (NRW) or the Environment Agency (EA). The deployment applications themselves will cover more site-specific assessment and procedure (if required) to deal with any environmental issues that may arise within each deployment due to the potential variability of each site they are deployed on.

The standards outlined within the following documents submitted will be adhered to throughout site operations:

How to Comply, SGN5.06, H1 guidance, and H4 guidance

The site is registered at:
Prichard Remediation Ltd
Earthmovers House, Unit 16,
Llantrisant Business Park,
Llantrisant,
Pontyclun
CF72 8LF

The site operator is:
Llantrisant Recycling Centre Ltd
Earthmovers House, Unit 16,
Llantrisant Business Park,
Llantrisant,
Pontyclun,
CF72 8LF.

1.1. Site TCM

The TCM for this permit and the deployments will be George Harvey, he has successfully completed the WAMITAB Level 4 MR0C13 Medium Risk Operator Competence for Land Remediation. WAMITAB reference number has not yet been provided due to delays on the part of WAMITAB.

1.2. Site Plans

The extent and layout of the permitted operations will be shown within drawings / plans to be submitted with each deployment applied for. The deployment applications will identify the following:

- Operating boundary
- Security and access arrangements
- Areas of waste soils and contaminated material, substances or products for remediation by the mobile plant.
- Location/siting of principal plant and equipment
- Process, treatment, storage, and quarantine areas
- Drainage systems
- Location of boundary monitoring points and pollution control units
- Potential receptors (i.e. Housing, watercourses etc.)
- Protected sites (if applicable i.e. SAC, SPA, Ramsar or SSSI within 1 km)

Should it not be feasible to show any of the above for example due to the particular method of treatment, site specifics or nature of waste to be treated then this will be covered by confirmation in each deployment.

1.3. Site Security

In general, each site will be fenced in its entirety with the addition of the following infrastructure:

- Offices and stores;
- Diesel tanks;
- Drainage holding pit;
- Electricity supply;
- External yard lighting;
- CCTV cameras (where possible); and
- Water Storage Tanks / bins as a waste management area

A review of the area will be undertaken prior to works and boundaries inspected daily.

1.4. Site Identification Board

A site identification board will be displayed and maintained at the site entrance and display the following information:

- Site name and address;
- Permit holder's name;
- Permit number;
- Emergency contact details including telephone number;
- Statement that the site is licensed by the NRW;
- Natural Resources Wales contact numbers including incident hotline number 0300 807060; and
- Days and hours site is open.

The sign will be maintained in a legible condition and updated as necessary.

2.0. Operational Procedures

Waste will generally be treated in line with a pre-agreed remediation plan/site strategy that will have been agreed or approved through the applicable planning process. Ideally and wherever possible, prior engagement will be sought from the appropriate regulation authority, whether that be NRW or the EA, before deployments are sought though this may not always be possible. Each site will be dealt with on an individual basis and consideration given to its nature, waste arising classification, most suitable and effective treatment methodology and the risks presented to the environment and public health. In virtually all situations, this EMS will work in conjunction and be complimented by the sites CEMP document.

The wastes and their applicable waste codes that are treated by this permit will be agreed by NRW / EA through the deployment process. Only agreed wastes will be treated and by the agreed and permitted treatment methodologies. Any material that is not able to be treated will be contained on site and removed for disposal at a suitably licensed facility.

2.1. Pre-acceptance procedures

The pre-acceptance procedures adopted for Prichard Remediation Ltd are in accordance with the Sector Guidance Note 5.06 section 2.1.1. In order to ensure that unsuitable wastes are not accepted into the process; the site management team will be used to ensure that the materials identified are suitable to be treated and by the prescribed treatment methodology. This will be done by checking that the waste being treated is firstly coded correctly and secondly whether the EWC code is on the list of permitted wastes agreed as part of the deployment. The site management will also determine whether the waste is likely to be contaminated and what nature this contamination takes. This assessment will be visual and will often involve the use of laboratory testing. If it is deemed that the wastes are not suitable to be recovered on site as a result of these procedures; they will not be accepted into the process and will be removed from site.

A pre-acceptance screening procedure will be used to ensure that the wastes that are being proposed for treatment comply with firstly the requirements of the environmental permit held and secondly, whether the wastes are suitable to be recycled or recovered. This process will involve a review of information from the site and may include representative samples of the waste being treated on site before bulk loading inputs to ensure that effectiveness of the treatment. However, more often than not this will already have been undertaken as part of a detailed remediation strategy and site investigation prior to any commencement of works on site.

All waste to be utilised within the aforementioned treatment process will be present on site and generally have the following information assigned to them:

- How the waste was derived including any variability within the process.
- The EWC code assigned for the waste.
- Chemical analysis and composition of the waste.
- Quantity of waste to be treated.
- Any hazards within the waste.
- How old is the waste material, and;
- Contingency plans for non-conforming waste should the need arise.
- Acceptance procedures

All wastes that are treated by Prichard Remediation Ltd are both visually and olfactory checked when picked up, tipped off and stored on the site of end use (if applicable). They will also often be the subject of additional sampling and testing to ensure that they have been treated to the desired specification for the client and for reuse.

Duty of care paperwork is checked, as applicable, by the operative on site at the point of collection or delivery to ensure that the waste is compliant with the EWCs on the permit and deployment of the site. It may be the case that a season ticket is used for wastes that are repeat loads under the same deployment. However, often as the waste is being moved within the same permitted site area the duty of care requirement will not be needed.

All vehicles that are depositing materials onto site will be directed to the most appropriate waste reception area by the foreman for site. When the load is tipped off, the contents are visually checked for contaminants and to see if the waste matches that described and coded on the accompanying transfer note (where applicable).

Waste will then be stored on the site waiting for treatment / treated at the source location. The storage of the waste will not exceed those parameters identified within permit / deployment forms. The wastes will often be bulked up in order to gain enough of a tonnage to make the treatment process effective. The waste may need to be bulked up on site as there may only be a small window of opportunity to treat the waste and reuse the products (as applicable) in periods of dry and suitable weather.

The waste will be stored / treated in pre-determined locations that have been appropriately risk assessed to ensure that the environment is protected, in line with the approved risk assessment for each site deployment.

Batch / material treatment information is to be retained where relevant and used as part of the treatment process and will include all information obtained during pre-acceptance, acceptance, storage, treatment and/or removal off-site.

These records will be kept so that inspection of loads can be simply carried out.
The tracking system should operate as a waste inventory/stock control system and include as a minimum:

- date of arrival / production on-site
- pre acceptance and acceptance analysis results (chemical and visual) if required
- intended treatment/disposal route
- record accurately the nature and quantity of wastes held on site
- where the waste is physically located in relation to a site plan

The adoption of such a tracking system will allow for accurate figures with regards current storage and treatment tonnages on site at any one time to be provided.
The treatment methodologies and waste type to be treated under the permit for Prichard Remediation Ltd are detailed within the permit.

2.2. Waste rejection procedures

Waste shall only be acceptable for treatment at site if it conforms to the list of permitted wastes, if it conforms to the written description of the waste producer and if the tonnage limit allows it, all of which are prescribed by the deployment form.

If, in the unlikely event a waste type is encountered on site that does not comply with the above then the usual site rejection procedures will be enforced:

- The waste will be separated from any other wastes currently on site and will be stored in a dedicated quarantine area.
- The waste will be re-directed from site to another suitably permitted facility (under the control of Prichard Remediation Ltd group if possible).

The quarantine area will ideally be located away from the rest of the waste and product material on site to avoid any potential cross contamination. However, there may be temporary areas within specific treatment areas that are used as interim holding areas and these may change from time to time as needs arise. However, at all times cross contamination will be prevented and the risk to the environment and public health managed according to the risk assessment agreed as part of the deployment. Should anything be encountered, that would require this risk assessment to be updated, NRW will be informed and the risk assessment updated accordingly. Due to the waste acceptance procedures on site and the site investigation information generally obtained at the outset of most projects, it is not foreseen that more than 1 load of rejected material will be physically deposited on site and so the load will be able to fit in a 40yd sealed skip. The quarantined material will not be stored on site for longer than necessary, though this may vary depending on the nature of the material encountered. However, it will generally be no more than 5 working days to reduce the risk of any pollution occurring.

3.0. Mobile Plant Treatment Procedures

3.1. Product storage

All waste that Is not able to be stockpiled shall be stored within a secure container (including lagoons). It is not anticipated that liquid wastes will be stored on site during the deployment phase, though on occasion this may occur.

Material stockpiles that are required for treatment will often be large to ensure efficiency of operation and to minimise the amount of movement of plant. On occasion, multiple items of the same plant will be used for treatment purposes. In this case, site supervision will ensure that the areas and material being treated at any one time confirm to the deployment form agreed.

Any non-waste material or material that is encountered will be kept separate from waste material wherever this is feasible. In the event that they have to stockpiled or kept next to each other, then a sacrificial layer will be provided to ensure that no cross contamination occurs. This will of course only happen if the site investigation and contamination encountered (where applicable) does not provide for any unacceptable leaching risk.

No waste materials shall be stored for periods greater than 12 months before being used under deployment.

3.2. Monitoring Procedures

All areas of the site are to be monitored for escape of emissions in periods of heavy wind, dry periods, heavy rainfall and extensive plant and vehicle movement. Any defects/incidents found within the inspection will be reported to the Site Manger and Environmental Manager for the company and a schedule of repair/mitigation works will be initiated. If a breach of permit conditions has occurred that has resulted in an environmental pollution incident as defined by NRW; NRW will be informed as soon as possible.

All mobile plant will be inspected by drivers in accordance with established company procedures. Any repairs will be carried out promptly by the company's maintenance department on site, or if required transported to the company's workshop.

Sampling and testing results will also be reviewed to ensure that compliance with product specification / remediation standards are being met. Any non-compliant material will be identified, removed and retested or disposed of from site if it is not suitable. The deployment application will detail how Prichard Remediation Ltd will ensure that this doesn't happen and against what levels comparison will be made.

3.3. Plant for deployment

The required plant and machinery will be dependent on the nature and type of contamination and the most suitable treatment methodology for the site. This will be advised to NRW / EA prior to the deployment form being agreed.

4.0. Accident Management

The processes to be followed in the case of an accident/incident on site are to be adopted to ensure that if an accident/incident does occur, the impact on the environment is as minimal as possible.

The operator recognises that “accident” for the purposes of this document means an accident, incident or event that may result in pollution.

The site risks will be identified by the risk assessment completed for each deployment. The following list details those items which require particular attention:

- Emissions and monitoring (including noise, dust, odour)
- Breakdown and Spillages
- Drums and other containers
- Plant and vehicle maintenance
- General accident procedures

Following the completion of the site-specific risk assessment, where it is deemed necessary (particularly with reference to emissions) where it is deemed that a specific monitoring plan needs to be in place this will be submitted as part of the deployment form. Generally, these will include / reference the CEMP documents.

4.1. Emissions and Monitoring

Odour / Dust / Noise can all be potential issues off site and are commonly associated with remediation projects / practices. However, site specific plans will be formulated at the site when the waste is being treated should any complaints be made that the treatment is giving rise to any of these issues. A generic OMP / NMP / DMP has been produced and is attached to this EMS.

Due to the varying nature of the sites through the mobile plant/deployment scheme; this will have to be considered site specifically upon deployment application.

Prichard Remediation Ltd will continue to maintain and service the plant in accordance with the manufacturer recommendations to help keep the machinery as quiet as possible and working effectively.

Mud, debris and dust will continue to be managed in a way that currently exists on across all Prichard Remediation sites. The use of a road sweeper will be used if deemed necessary and be used more frequently if required along the roads and lanes surrounding the site where the deployment is being made. Tractors and bowsers may also be used.

However, if complaints about noise and dust are received from outside of the deployment boundary then an investigation will be initiated. This will include Frisbee monitoring for dust and a noise monitoring programme will be developed that incorporates monitoring of noise levels at several locations at different times of the operational day. This will enable Prichard Remediation Ltd to identify any patterns in the complaints and noise levels, reducing them where possible.

4.2. Breakdown and Spillages

In the event of breakdown of the plant, alternative machines will be brought on site until it is repaired. If an alternative machine cannot be used, then waste will be stored until the plant is repaired. In the event of a long-term breakdown of the plant an alternative machine will be brought on site until the faulty unit is repaired. Due to the large volume of plant and machinery available through the group it is no foreseen that any breakdowns will result in the deployment needing to be stopped at any time.

Any spillages of fuel will be cleared immediately by depositing materials from a spill kit on the affected area. The material will be placed in a skip/container to be taken to a suitably licensed site for disposal.

If there is a risk that dust will be emitted following a malfunction or breakdown the plant will be shut down for repairs.

4.3. Plant and vehicle maintenance

Each item of plant and machinery used by Prichard Remediation Ltd is visually inspected each day before the plant is operated. This includes maintaining equipment specifically to reduce noise levels, for example balancing fans and fixing loose covers. If any defects are noted, these are immediately reported to the plant manager and the defect is fixed either onsite, or if this is not possible, the plant is transported to the maintenance department at where a full repair workshop is sited. When not in use, the plant will be shut off to avoid any potential nuisance being caused by the turning over of the engines.

The plant and machinery are routinely fully serviced and maintained at 6 month and annual time periods to ensure the effective and efficient operation of the site.

Prichard Remediation Ltd run an effective maintenance programme for all plant used.

5.0. Management, Site Staff and Training

5.1. Management

The Environmental Manager will undertake audits of the site's performance against the Management System to ensure the site is operating effectively and compliant with any new regulatory or permit requirements. A regular review of the management system will be undertaken by management.

5.2. Technical Competency

The relevant technical competency is held by George Harvey. Management will ensure that the Technical Competency is maintained in accordance with industry requirements. Suitably qualified consultancy staff will be brought in to manage the site if this is not the case.

5.3. Site Management

Direct responsibility for implementing the Management System at the site is held by the Site Manager. All site staff will report directly to the Site Manager.

The Site Manager will also be responsible for interim audits of the management system in response to changes to the site's operation, company changes, incident/accidents, complaints, and use of new plant or techniques. This will include reviewing as appropriate permit documentation such as inspection records, operational procedures and associated records including training.

5.4. Staff Training

All staff will be trained and competent to both manage and operate the site to ensure compliance with the permit and this will be recorded through staff training matrix, tool box talks and staff training schemes as applicable. These will be reviewed and updated regularly as required. Any contractors working on site will also have the skills and knowledge they need and a contractor check sheet will be completed prior to commencing any works.

All staff working on permitted activities will be trained on what the management system means and their responsibilities and role within it. Copies of the permit will be kept on site in the main office for access at all times. In addition, each site will generally operate the following:

- Sign in sheet and plant allocations sheet to determine sufficient resource capability and capacity;
- Organigram for each project listing the roles and responsibilities of all your staff

- Tool box talks will be regularly carried out to ensure staff are trained in aspects that can lead to pollution and the measures to be taken to prevent that pollution and accident and incident management
- Site induction for staff, visitors and contractors

5.5. Plant and vehicle training

All operatives that are required to operate plant and machinery are suitably trained in it operation, safety and maintenance. This training is regularly monitored and checked by a dedicated training and resource department. Staff will also be provided with regular tool box talks to ensure they are kept up to date with site activities.

6.0. General Accident Procedures

If an accident or incident causes damage to the environment, or risks doing so, the site manager or a member of staff designated by him must:

a. Immediately isolate the problem
b. Report the accident to the Natural Resources Wales local office
c. Do whatever is necessary to minimise the environmental consequences
d. Clean up after the incident or spillage
e. Record the incident or accident, in a report book or folder
f. Find out why the accident happened
g. Consider if your response and actions were adequate
h. Take any actions needed to stop it happening again
i. Review and amend the accident management plan as soon as possible. Investigate malfunction, breakdown or failure of plant and equipment, techniques and near misses, releases to the environment, or impacts on the local amenity. The site Manager must be able to:
    I. Detect abnormal operation and investigate the causes
    II. Assess the information and decide what to do.
    III. In the short-term, get back to normal operation.
    IV. In the long-term take steps to make sure the problem does not happen again.

7.0. Information Records

7.1. Waste Records

In the event that waste is received on the site or removed from the site, the following will be recorded for each load of waste:

- The vehicle registration number;
- The haulier's Registration of Carriers registration number;
- A Transfer Note showing the waste producer, a description and amount of the waste;
- The haulier of the waste and the waste's collection point; and
- Location the load is directed to for unloading.

If the material removed is hazardous, consignment notes will be used and information recorded accordingly.

7.2. Site Diary

The Site Diary will be maintained by Site Staff and kept at the site offices, recording:

- Site opening times;
- Staff on site;
- Daily weather conditions;
- Incidents / abnormal site conditions;
- Refused loads / unacceptable wastes;
- Details of regular daily and weekly site inspections including any consequent actions;
- Regulatory inspections, with the outcome and any actions required;
- Plant breakdown / failure;
- Site closure; and,
- Complaints and actions taken.

The site diary will be available for inspection to Natural Resources Wales officers.

7.3. Other Record Keeping

In addition to the Site Diary the Site Staff / Site Operator will also keep:

- Permit;
- Management system and accompanying documentation;
- Details of plant maintenance and inspection records;
- Details of waste removed from site;
- Complaint details including investigations and outcomes;
- Reviews, audits and amendments of management system;
- Records of training of staff; and

- Natural Resources Wales Compliance Assessment Reports and actions.

All records associated with the site shall be kept for a minimum of six years in accordance with the requirements of the Environmental Permit.

8.0. Complaints

Any complaints received at the site will be immediately investigated by the Site Staff and / or the Site Operator. Where appropriate, remedial action will be taken.

The complaint will be reported to the Site Operator within 24 hours. The original complainant will be informed of the outcome of the investigation of the complaint and any actions taken within 5 workings days.

Details of each complaint, including the complainant's details, actions taken and outcomes, will be recorded on a complaint log, which will form part of the records of the site diary.