

Appendices

- **Document 1a**
- **Document 2a**
- **Document 2b**
- **Document 3a**
- **Document 3b**
- **Document 4a**
- **All WAMITAB Certification**

Pilkington Asbestos Removal Services Ltd

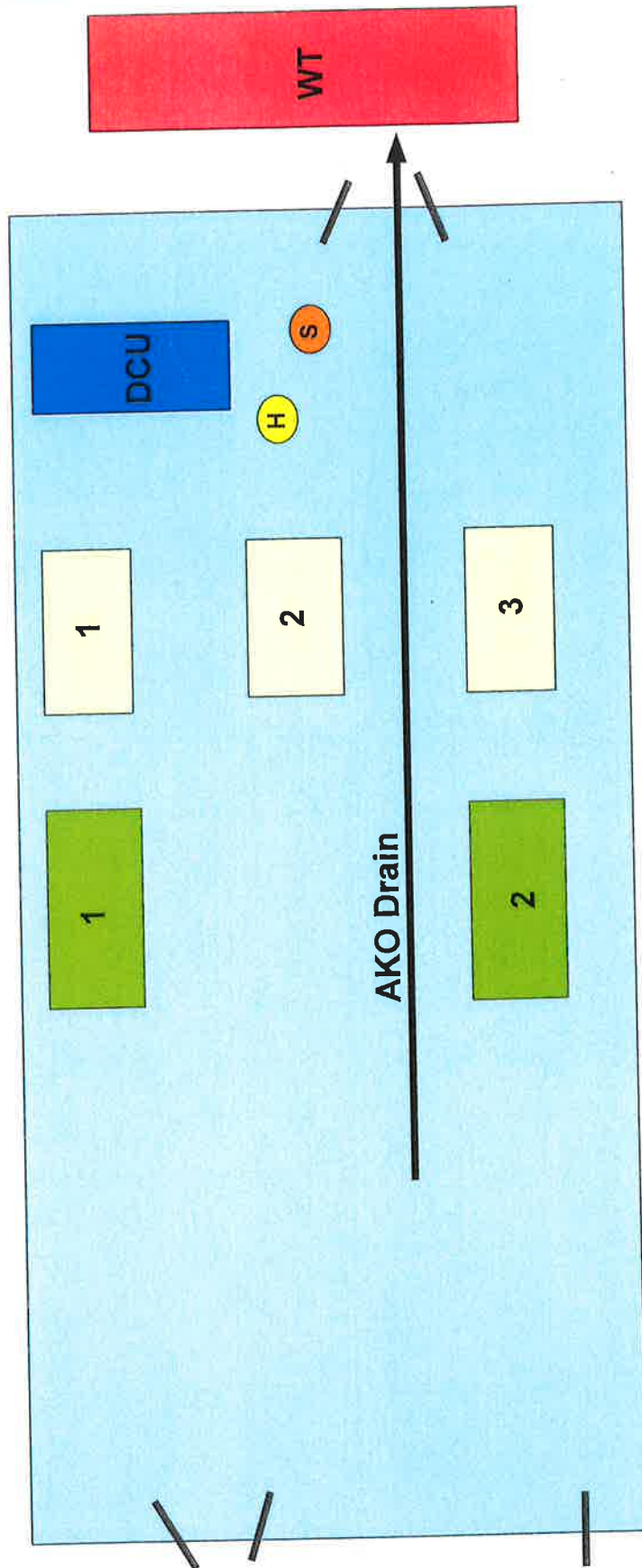


Document 1a

We currently hold a Standard rules SR2008No9 and we would like to add Standard Rules SR2008 No24 to our permit to enable clinical and healthcare waste to our waste transfer station.

Plan of the Pilkington Asbestos Removal Ltd Waste Transfer Station

Pilkington Asbestos Removal Services Ltd
Document 2a



-  - Spill Kit
-  - H Vac
-  - Clinical Waste Skips x 2
-  - Asbestos Skips x 3
-  - Waste Tank
-  - Decontamination Unit

Pilkington Asbestos Removal Services Ltd

Document 2b



1 FACILITY AND OPERATOR ADDRESSES

Facility Details

Glan Aber Works
Unit 2&3
Vale Road
Rhyl
LL18 2PL

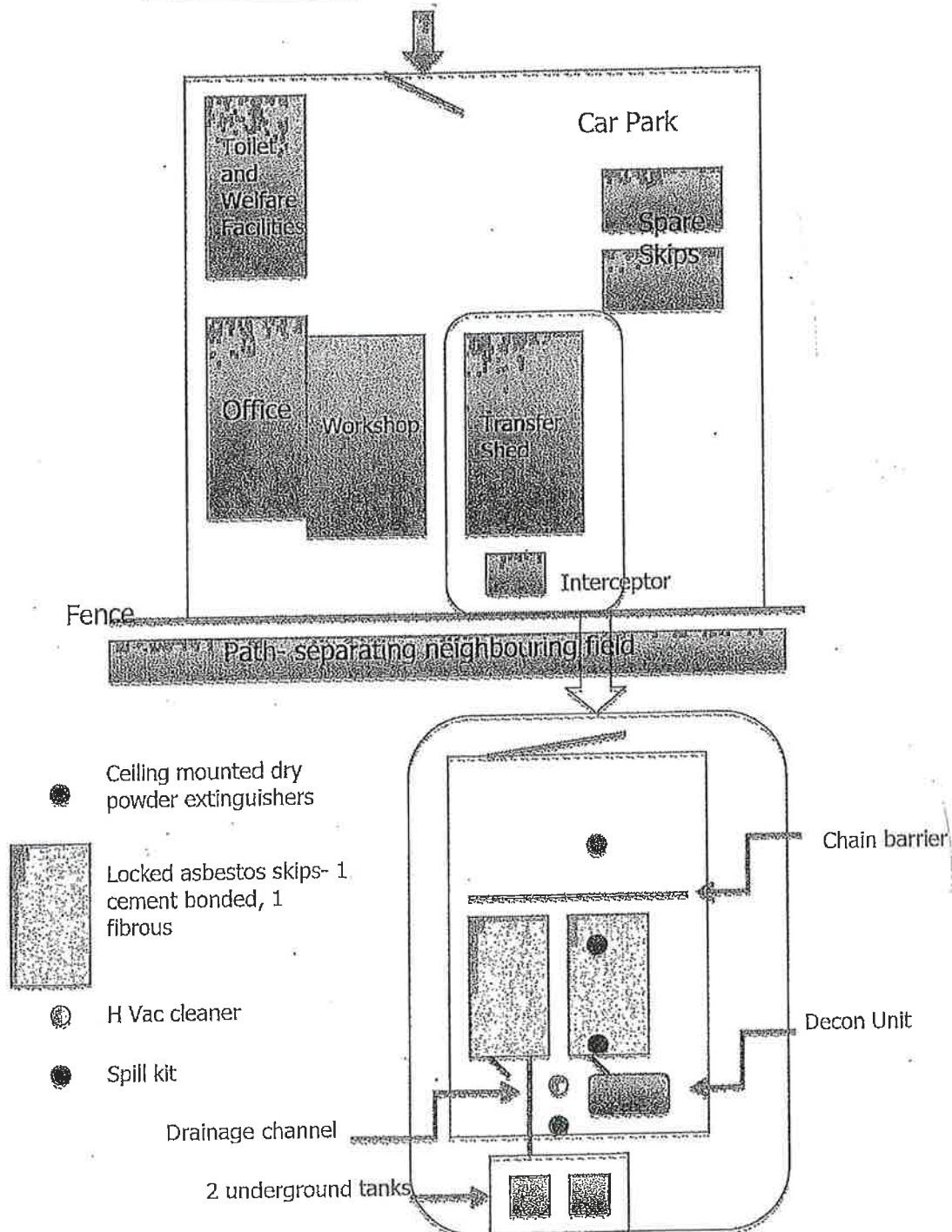
Tel. 01745 350257

Email: parsltd@hotmail.co.uk

Operator Details

Pilkington Asbestos Removal Services Ltd

2 SCHEMATIC FACILITY LAYOUT



Pilkington Asbestos Removal Services Ltd

ACCIDENT MANAGEMENT PLAN

This Accident Management Plan (AMP) document is the property of PARS Ltd. The Accident Management Plan has been developed based upon known activities and information available at the time of preparation.

The Management System provides the procedures necessary to operate the facility in accordance with the conditions of the relevant Standard Rules Environmental Permit and to meet the wider requirements for this type of operation set out within the Environmental Permitting (England & Wales) Regulations 2010 (SI 2010 No. 675) and the Waste (England and Wales) Regulations 2011 (SI 2011 No. 988)

PREPARED BY:

PILKINGTON ASBESTOS REMOVAL SERVICES Ltd

AUTHORISED BY:

Derek Pilkington

CONTROLLED COPY No: 1

COPYHOLDER: (Site- Site Operatives)

1. INTRODUCTION

1.1 BACKGROUND

1.1.1 A management system has been produced for the PARS Asbestos Waste Transfer Site ("the facility"), which is operated by PARS Ltd ("the Operator") under a Standard Rules environmental permit ("the permit") issued by Natural Resources Wales.

1.1.2 Conditions in the environmental permit states that:

1.1.2.1 The operator shall manage and operate the activities:

a) 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 of the operator as a result of complaints; and

b) Using sufficient competent persons and resources.

1.1.2.2 Records demonstrating compliance with rule 1.1.1 shall be maintained.

1.1.3 In line with Environment Agency's Guidance Note: "How to comply with your environmental permit (v6 June 2013) an accident management plan has been prepared and implemented for these operations. Based on this guidance the accident management plan has been produced to:

- Identify events or failures that could damage the environment;
- Assess how likely they are to happen and the potential environmental consequences; and
- Take steps to minimise both the potential causes and consequences of accidents.

1.1.4 This Accident Management Plan (AMP) has been produced in the light of the Environment Agency's guidance and forms an integral part of the Management System under which the facility will be operated. In particular, the AMP provides the procedures that should be implemented to either prevent or minimise potential impacts of accidents, incidents and non-conformances.

1.1.5 A review of the potential risks to the environment associated with the operation of the facility has been undertaken, with consideration taken of the local environmental setting and nature of the waste operations. These considerations have informed the scope of the Accident Management Plan, as well as the associated Management System. A copy of the Generic Environmental Risk Assessment is included at Appendix AMP8.

- 1.1.6 The AMP and associated Management System, has been developed with reference to the Environmental Agency's Guidance Note: "How to Comply with your Environmental Permit" (v6 June 2013).

1.2. DISTRIBUTION AND AUTHORISATION RECORDS

- 1.2.1 It is the overall responsibility of the **Technically Competent Manager** to authorise the AMP is detailed in Table 1.
- 1.2.2 Copy Number 1 will be retained at the Waste Transfer Area and Copy Number 2 will be retained at the office of the Technically Competent Manager. Issue of controlled copies can either be completed via email direct to the recipient, or in hard copy using the issue receipt in Table 2.
- 1.2.3 Acknowledgement of receipt must be obtained from the recipient. If the AMP is issued electronically this should be via return email, and if the AMP is issued in hard copy, the recipient should complete the issue receipt in Table 2 and return the photocopied page. **This acknowledgement must be retained in the Miscellaneous Appendix of the Master Copy of the AMP.**

Table 1: Accident Management Plan controlled copy holders

Copy No.	Recipient	Location
1	Site Operative	Waste Transfer Area
2	Technically Competent Manager	Office

- 1.2.4 Any revisions made to the "Master Copy" shall be issued to all other controlled copyholders. It is then the responsibility of the controlled copyholder to amend their MS manual as revisions are received.
- 1.2.5 The document issue status is as indicated in Table 3 in Section 1.4. Dates and scope of revision will be as set out in the updated revision record in table 3.

Table 2: Controlled Copy Issue Receipt

Copy No.	Recipient	Date Issued	Date Received	Signature*
1	Site Operative			
2	Technically Competent Manager			

*Only if AMP is issued in hard copy format

1.3. REVISION RECORD

1.3.1 Minor changes to the AMP (e.g. changing a name in the contacts) do not require a re-brief of the AMP manual to the site staff. These can be recorded below.

1.3.2 Major changes, or six subsequent minor changes, do require a full briefing to the site staff and new issue number.

TABLE 3: Accident Management Plan Revision Record

Issue Number	Date	Section Number	Subject	Authorised
1		1-4 Inclusive	Issued for Use	

**The continuation sheet for this table must be retained in Miscellaneous
Appendix of the Master Copy**

1.4. BREIFING OF THE ACIDENT MANAGEMENT PLAN

- 1.4.1 This AMP and any subsequent revision, must be briefed to all site-based staff, and recorded in a “live” version of Table 5 below. This includes any agency personnel or sub-contractors employed by PARS Ltd so as to execute their responsibilities with respect to compliance with the permit.

Responsibility: It is the responsibility of the **Technically Competent Manager** to ensure that the AMP is communicated to site staff and that this is recorded.

Table 5: Accident Management Plan Briefing Record

Name	Signature	Company	Issue Number	Date

The continuation sheet for this table must be retained in the Miscellaneous Appendix of the Master Copy of the AMP

2. FACILITY DETAILS

1 FACILITY AND OPERATOR ADDRESSES

Facility Details

Glan Aber Works
Unit 2&3
Vale Road
Rhyl
LL18 2PL

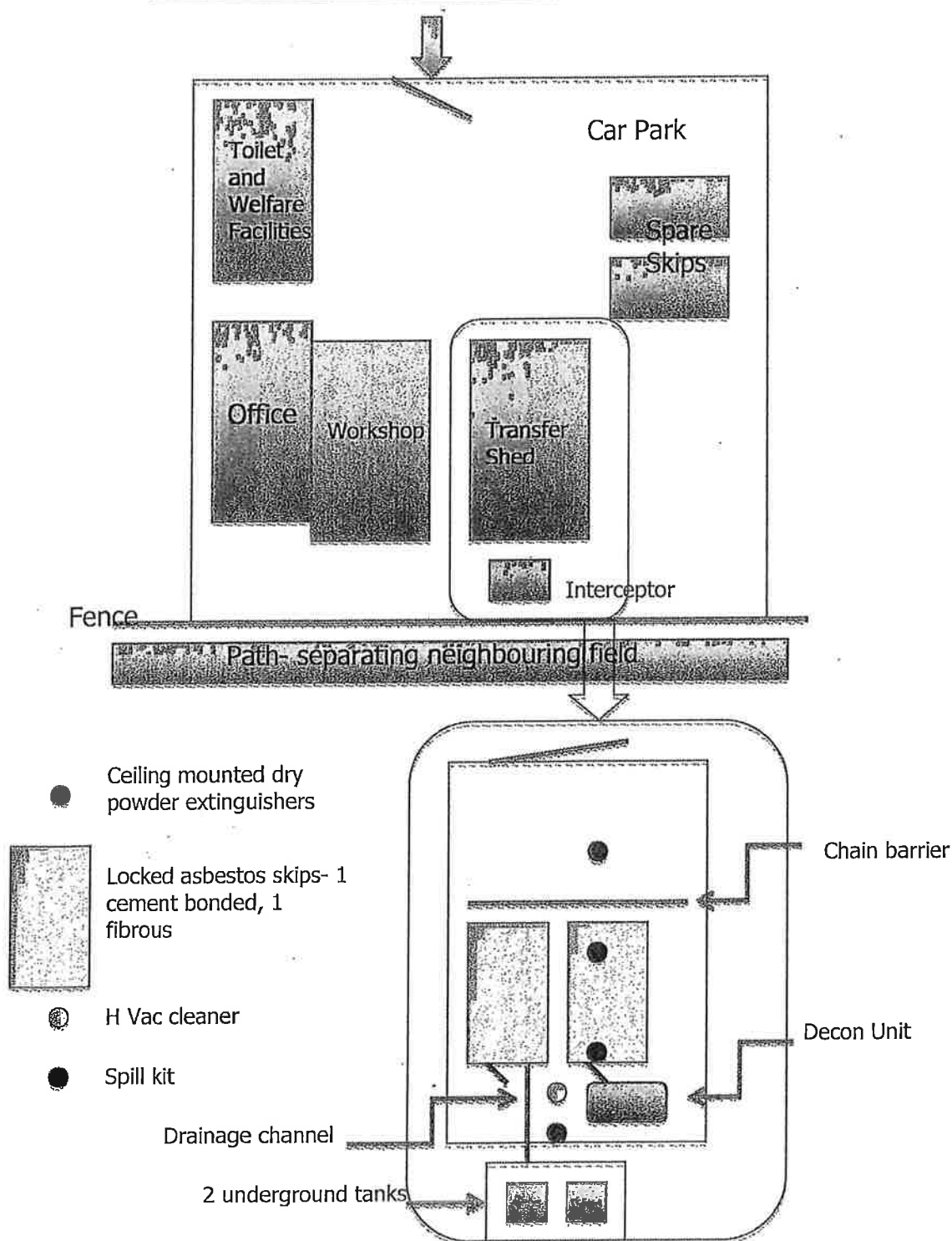
Tel. 01745 350257

Email: parsltd@hotmail.co.uk

Operator Details

Pilkington Asbestos Removal Services Ltd

2 SCHEMATIC FACILITY LAYOUT



3. CONTACT DETAILS

1 Emergency Numbers

Table 6: Emergency Contact Numbers

Contact:	Telephone No:
Emergency Services and Regulators	
Emergency Services	999 (Staffed 24hrs)
Natural Resources Wales (Environment Hotline)	0800 80 70 60 (Staffed 24hrs)
Natural Resources wales (Site Officer)	TBC
Health	
Local Hospital (A&E Department)	01745 583 910
NHS Direct	0845 4647 (Staffed 24hrs)
Crime	
North Wales Police	101 or 999
Utilities	
UK Power Networks	0800 783 8838 (Staffed 24hrs)
Natural Gas Emergency Services	0800 111 999 (Staffed 24hrs)
Dwr Cymru	0800 052 0130 (Staffed 24hrs)

2 COMPANY EMERGENCY CONTACTS

Contact	Telephone Number
Technically Competent Manager	07836 540 186
Site Office	01745 350 257

Nearest Hospital (Accident and Emergency)

Glan Clwyd Hospital, Rhyl, Denbighshire, LL18 5UJ (4.2 miles)

Get directions My places

Driving directions to Rhyl LL18 5UJ, UK

Rhyl LL18 2PL
UK

1. Head southwest toward Vale Rd/A525
420 ft
2. Turn left onto Vale Rd/A525
Continue to follow A525
Go through 4 roundabouts
2.7 mi
3. Turn right at St. Asaph Rd/A525
1.3 mi
4. Turn right
249 ft
5. Turn left
Destination will be on the right
0.1 mi

Rhyl LL18 5UJ
UK

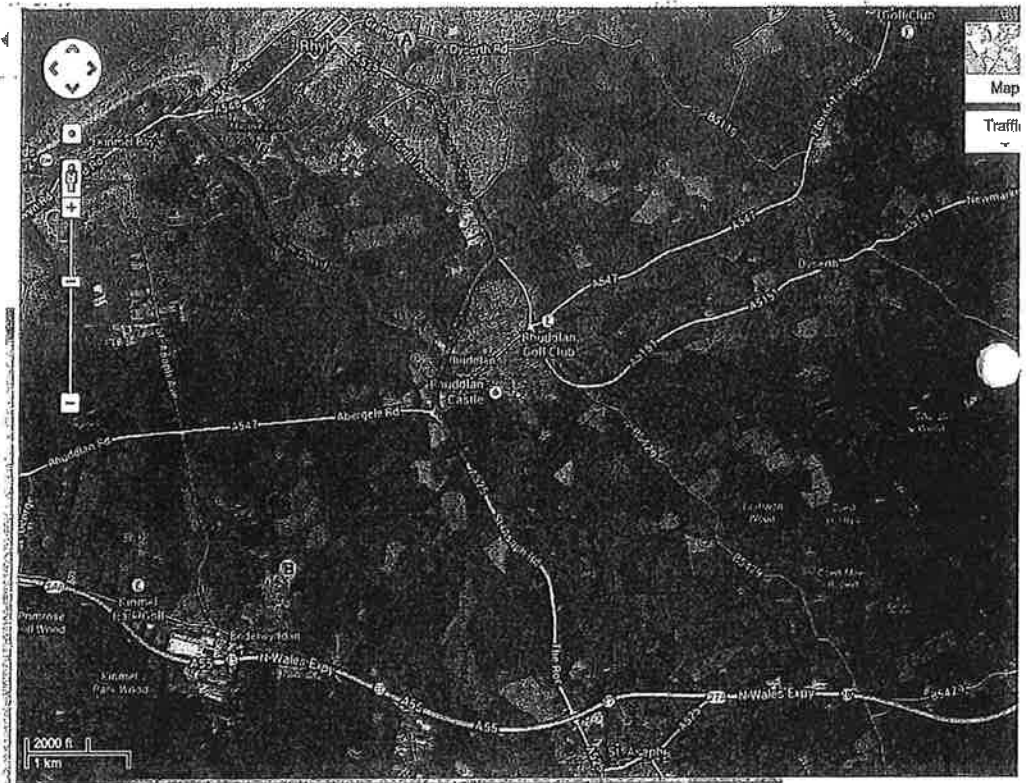
Save to My Maps Est. fuel cost: £1.19

These directions are for planning purposes only. You may find that construction projects, traffic, weather, or other events may cause conditions to differ from the map results, and you should plan your route accordingly. You must obey all signs or notices regarding your route.

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Google Maps - ©2013 Google - Terms of Use - Privacy



4. EMERGENCY PROCEDURES

4.1 HIGHER RISK ASPECTS

Fugitive Emissions & Leaks and Spillages

- 4.1.1 Owing to the nature of the activity specific procedures to minimise the risk from fugitive emissions have been included at **Appendix MS3** of the Management System.
- 4.1.2 Specifically, procedures for dealing with potential release of asbestos dust and the potential to harm to health through exposure.

Transfer Area

- 4.1.3 The transfer area is enclosed and contains three locked skips for the reception of fibrous and cement bonded asbestos and two clinical waste skips for the storage of offensive/hygiene and clinical waste.
- 4.1.4 The area is checked formally on a daily basis by the **Technically Competent Manager** and also by operatives involved in the transfer activity.

For a release of asbestos during the unloading, implement the following emergency procedure:

- Spray down the area using sprays provided in the vans and also in the transfer station. Ensure a full soaking;
- Where the spillage occurred as a result of a split bag, rebag the material and place in the appropriate container;
- H vac the area;
- Report to the **Technically Competent Manager** (or their deputy). They will then contact the appropriate regulatory authorities.
- Independent analysts will be required to confirm the cleanliness of the area before it is permitted to reopen.

In undertaking the above procedure staff will be wearing full PPE as part of their normal activity, but further disposable PPE and masks are provided in a cabinet within the transfer area.

A decontamination unit is provided within the transfer area and this will be used in the event individuals are exposed to asbestos fibres during the above process.

For the potential of exposure to harmful substances or microorganisms, through the unloading and storage of offensive/hygiene and clinical waste, implement the following emergency procedure:

- Safely remove the contaminates using appropriate equipment provided within the Waste Transfer Station;
- Wear suitable PPE including specialist protective gloves;
- Dispose of the waste within the designated skip safely;
- Decontaminate the area using "Black Bleach"
- Report to the **Technically Competent Manager** (or their deputy). They will then contact the appropriate regulatory authorities.

In undertaking the above procedure staff will be wearing full PPE as part of their normal activity, but further disposable PPE and masks are provided in a cabinet within the transfer area.

For major fuel/oil or chemical spillage, implement the following procedure;

1. Clear the area immediately and turn off any non - moveable equipment in the vicinity (if safe to do so).
2. Attempt to make a bund or raft to contain the liquid in order to limit the extent of the spillage.
3. If required, use the personal protective equipment (PPE) provided on site.
4. If safe to do so, try and contain the spill using absorbent materials available within the on-site spill kit.
5. Report to the **Technically Competent Manager** (or their deputy). They will then contact the appropriate emergency services (phone 999, ask for the fire and Rescue Service and Ambulance Service if there are any injuries) and request assistance.
6. Natural Resources Wales will be contacted to explain what has happened so they can take any appropriate action; a note will be made of the telephone conversation.
7. At no time put staff, customers or the public at risk.
8. If appropriate close the facility, wait at the gate for the emergency services and explain the situation prior to allowing access on site.
9. Do not allow staff or the public to go back into the facility until authorised to do so.

10. Keep staff, customers, and if appropriate public, informed about what is going on at all times.
11. Once it is safe to enter the site, re-open to customers and update Natural Resources Wales; make a note of the telephone conversation.
12. Formally report the incident and remedial actions to Natural Resources Wales as soon as practicable, in accordance with the Permit.
13. Any incidents will be investigated in order to determine the cause and review the relevant management procedures; the nature of the incident and remedial action will be recorded using the Pollution Incident Form provided at **Appendix AMP1** of the Accident Management Plan.
14. The resultant spillage material should be disposed of in accordance with the requirements of the Environmental Protection Act 1990 and the EP Regulations. Specialist advice must be sought in the event of any doubt.
15. The Management System and Accident Management Practicable after the incident has been dealt with.

Fire

- 4.1.5 There is the potential for some items on site to burn. Therefore, appropriate precautions and responses are required to minimise the risk from fire.
- 4.1.6 Firefighting equipment will be located within the Transfer area, namely ceiling mounted dry powder sprinkler system (a traditional water sprinkler would freeze in the unheated building).
- 4.1.7 In the event of a fire at the facility, the following procedure will be implemented:
 1. Clear the area straight away.
 2. Any fire will be treated as an emergency and will be extinguished at the earliest opportunity.
 3. If required, use the personal protective equipment (PPE) provided on site.
 4. If necessary, the Fire services will be summoned and the facility will be evacuated, with all staff assembling at the identified muster point.
 5. Natural Resources Wales will be informed, as soon as is practicable, and in accordance with the reporting requirements set out within the permit.

6. Incidents of fire may result in the accumulation of fire residues. It will be the responsibility of the **Technically Competent Manager** to arrange for the disposal of fire residues.
7. Appropriate equipment, will be used to collect the residues for placement in a suitable container (such as a plastic sack, depending upon the quantity). This will then be placed in the site's container for non-recyclable waste for disposal at a suitably permitted facility.
8. Any incidents of fire will be investigated in order to determine the cause and review the relevant management procedures; the nature of the incident and remedial action will be recorded using the Pollution incident form provided at **Appendix AMP1** of the Management System and include measures to be taken if non-confirming or unsuitable wastes are discovered after acceptance.

2 LOWER RISK ASPECTS

Unsuitable Wastes

- 4.2.1 This is considered to be a very low risk aspect. The nature of the activities on site means that any waste brought back to the site will be deemed to be "Asbestos containing, Clinical or Offensive/Hygiene Waste" and will be handled as such. As a result of this no "unsuitable wastes" are expected to be brought to the site, nevertheless an appropriate waste acceptance procedures have been put into place. These procedures are provided at **Appendix MS2** of the Management System and include measures to be taken if non-confirming or unsuitable wastes are discovered after acceptance.

Mechanical Breakdown

- 4.2.2 An appropriate planned preventative maintenance (PPM) programme will be implemented for plant/equipment, as well as any associated infrastructure, as required by the Management System.
- 4.2.3 If it is found that any essential spares and consumables are not available from local suppliers at short notice, then these will be identified and kept at the facility. A daily written record will be kept of the checks and any repairs.
- 4.2.4 Routine maintenance of the plant/equipment and infrastructure will be undertaken by appropriately trained/skilled mechanics. It is likely that these will be available at the Depot, or will be contracted from outside, as necessary.
- 4.2.5 Any malfunction or breakdown leading to an environmental incident will be dealt with promptly and process operations adjusted or stopped until normal operations can be restored. All such malfunctions will be recorded in the facility diary and, if appropriate, Natural Resources Wales will be informed, as soon as is practicable, and in accordance with the reporting requirements set out within the permit.

Drainage

- 4.2.6 There is a drainage system provided at the facility, with a grid surface drain leading to underground tanks.
- 4.2.7 The integrity of the surface, drainage channels and tanks will be checked on a working daily basis (formal procedure PAR/07/1113 and inspection form PAR/08/113) and will be repaired, as and when required, to ensure that it provides a solid, impermeable pavement capable of withstanding the operation and loading/unloading of wastes and capable of directing fluids through the drainage system (i.e. channels are not blocked).
- 4.2.8 Spills or leaks of hazardous fluids or chemicals onto the surface will be treated as an emergency and will be dealt with according to the procedures set out in this AMP.

Odour

- 4.2.9 The waste inputs to the facility are limited by the permit to asbestos containing wastes and as these are not intrinsically odorous, this is not expected to be an issue at the facility.
- 4.2.10 Where excessive levels of odour are identified beyond the facility boundary, or upon receipt of a complaint, the **Technically Competent Manager**, or appointed delegate, will instigate an investigation of the cause as soon as practicable (formal procedure PAR/07/113 and inspection form PAR/08/113). The investigation should determine the nature and source of the odour. The Management System will be updated accordingly and complaints will be logged (PAR/14/113).
- 4.2.11 Where necessary, the **Technically Competent Manager**, or appointed delegate, will instruct the cessation of any operations causing complaints of odour until such time as the situation can be resolved or the removal from site, to a suitably permitted facility, of any specific waste stream that can be identified as the source of the odour complaint. Any such waste should be removed from the site within 48 hours (or otherwise agreed with Natural Resources Wales).
- 4.2.12 If Significant odour is identified beyond the site boundary and is causing a nuisance, **Natural Resources Wales will be informed, as soon as is practicable, and in accordance with the reporting requirements set out within the permit.**
- 4.2.13 Any significant odour incidents will be investigated in order to determine the cause and review the relevant management procedures; the nature of the incident and remedial action will be recorded using the Pollution Incident Form provided at **Appendix AMP1** of the AMP.
- 4.2.14 In this event, a written odour management plan will be produced that will outline the measures that will be employed, and what response will be made, to prevent or minimise the odour.

4.2.15 The odour management plan will be submitted to Natural Resources Wales for approval. Once approved, the odour management plan will form part of the Management System under which the facility is operated.

Pests

4.2.16 The prospect of the wastes that will be accepted at the facility becoming attractive to pests and vectors of disease is considered to be remote. Nevertheless, the facility will be inspected on a working daily basis and if pests do threaten to become established at the facility, then the following may be considered: -

- Rodent control inspections on a quarterly basis, or as frequently required, by a qualified contractor;
- Bird Control using established bird scaring techniques; and
- Fly control as and when required by independent contractors.

4.2.17 If pests are found to be causing a nuisance, **Natural Resources Wales will be informed, as soon as is practicable, and in accordance with the reporting requirements set out within the Permit.**

4.2.18 In the unlikely event that waste accepted to the facility is subsequently identified to be fly infested, this should be isolated and placed in an appropriate container. Any such waste should be removed from the facility within 48 hours (or as otherwise agreed with Natural Resources Wales).

4.2.19 The **Technically Competent Manager**, or appointed delegate, will instigate an investigation of the cause as soon as practicable. The investigation should determine the nature and source of the waste such that similar waste types can be restricted from the facility in the future. The Management System will be updated accordingly (formal procedure PAR/07/1113).

Litter

4.2.20 The prospect of the waste that will be accepted at the facility becoming a significant source of litter is considered to be remote. Nevertheless, the facility will be inspected on a working daily basis for litter accumulations (formal procedure PAR/07/1113 and inspection form PAR/08/113).

4.2.21 In the unlikely event that litter does become evident at or around the facility, site personnel will be instructed to collect it for appropriate disposal. If litter is leaving the facility, it will be collected forthwith: otherwise, the facility will be tidied at the end of the working day.

4.2.22 If the litter is found to be leaving the facility on a regular basis, or if complaints are received, the **Technically Competent Manager** will review the existing procedures and control measures.

Unauthorised Access and Vandalism

4.2.23 Site security measures will be inspected on a daily working basis by the **Technically Competent Manager** (or their delegated deputy), in order to prevent unauthorised access and the risk of harm to the intruder or to the environment from acts of vandalism.

4.3 SITE CLOSURE

4.3.1 In the unlikely event that the facility has to be closed for any reason (see Section 4.1.4), loads will be diverted to other permitted facilities for the duration of the closure.

4.3.2 Natural Resources Wales will be notified of the closure in accordance with the Permit and a record will be made in the Site Diary.

APPENDICES TO THE ACCIDENT MANAGEMENT PLAN

AMP1 Pollution Incident Report Form

AMP2 Environmental Risk Assessment

MISCELLANEOUS APPENDIX

APPENDIX AMP1: POLLUTION INCIDENT REPORT FORM

This section contains a copy of the Pollution Incident Report Form, which must be completed in the event of an incident that has, or may, result in pollution; a copy must be inserted behind this cover sheet. Completed copies will be retained as part of the facility diary.

Accident (and Incident) Record

Record of accidents, incidents or near misses

Date and time of the incident	
What happened, what was it about?	
Was anyone else aware of this – other witnesses? If so who?	
What caused it?	
What have you done to make sure that it does not happen again?	
Was there any significant pollution or environmental damage to land, water or protected areas – for example: dust, odour or noise pollution outside the site or spillage of polluting liquids onto the ground, or at a site of special scientific interest, or into a drain or a watercourse? If so what?	
Is there a continuing threat? Yes / No	
If there was (or still is), then you must take steps to prevent further damage and notify the Environment Agency on 0800 807060 and any other relevant regulators ASAP. Have you done so? Yes / No	Who did you phone? At what time did you phone?
You must also write or send an email to confirm this to the local office (see your accident management plan for the address) Have you done so?	Yes/No What date did you contact?
Please print your name and sign	

Continue overleaf or on a separate sheet if you do not have enough room.
Keep the completed form in the file to discuss with the Environment Agency when they visit.

APPENDIX AMP2: ENVIRONMENTAL RISK ASSESSMENT

This section contains a copy of the Generic Environmental Risk Assessment that has been used to inform the production of the Management System and Accident Management Plan; a copy must be inserted behind this cover sheet.

Miscellaneous Appendix

Miscellaneous documents which are relevant to the AMP, but do not have a specified location, should have their details entered in the table below and then be inserted in to the AMP behind this page.

Table 9: Miscellaneous documents added to the MS Manual

[illegible]

Pilkington Asbestos Removal Services Ltd MANAGEMENT SYSTEM

This Management System (MS) document is the property of PARS Ltd. The Management System has been developed based upon known activities and information available at the time of preparation.

The Management System provides the procedures necessary to operate the facility in accordance with the conditions of the relevant Standard Rules Environmental Permit and to meet the wider requirements for this type of operation set out within the Environmental Permitting (England & Wales) Regulations 2010 (SI 2010 No. 675) and the Waste (England and Wales) Regulations 2011 (SI 2011 No. 988)

PREPARED BY:

Environmental Leadership Ltd

AUTHORISED BY:

Derek Pilkington

CONTROLLED COPY No: 1

COPYHOLDER: (Site- Site Operatives)

1. INTRODUCTION

1.1 BACKGROUND

- 1.1.1 A management system has been produced for the PARS Asbestos Waste Transfer Facility ('the facility'), which is operated by PARS Ltd ('the Operator'). The relevant details are provided below.

Site Name:	Pilkington Asbestos Removal Services Ltd
Site Address:	Glan Aber Works, Unit 2&3, Vale Road, Rhyl, LL18 2PL
Company Name ¹ :	Pilkington Asbestos Removal Services Ltd
Company Address ² :	Glan Aber Works, Unit 2&3, Vale Road, Rhyl, LL18 2PL
Authorisation Ref ³ :	EPR/ UB3097TE/A001
Authorisation Type:	Environmental Permit / Exemption
Authorisation Date ⁴ :	2/5/13
Operator Name ⁵ :	Pilkington Asbestos Removal Services Ltd
Insert a copy of the relevant authorisation into the Miscellaneous Appendix.	
Notes	¹ Name of company undertaking the operations under the MS and ² head office ³ Reference number of relevant waste authorisation for the site and ⁴ date issued ⁵ Name of the company to whom waste authorisation is registered

- 1.1.2 This Management System (MS) has been produced to meet the specific requirements of the Permit and provides the procedures necessary to operate the facility in compliance with the Permit and to meet the wider requirements for this type of waste operation set out within the Environmental Permitting (England & Wales) Regulations 2010 (SI 2010 No. 675).
- 1.1.3 The MS has been developed with reference to the Environment Agency's Guidance Notes: "*How to Comply with your Environmental Permit*" (v5, Aug 2012) and "*How to Comply with your Environmental Permit Additional Guidance for: Horizontal Guidance Note H6 - Environmental Management Systems*" (April, 2010). Other relevant guidance has also been referred to, as appropriate.
- 1.1.4 In addition to the activities that are authorised under the Permit, the facility may also, from time to time, be authorised to undertake various storage and recovery operations under Schedule 3, Part 1 of the EP Regulations (or previous relevant Regulations). A list of any and all registered exemptions will be included within the **Miscellaneous Appendix**.

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1.2 KEY COMPONENTS

1.2.1 The MS provides the relevant procedures for the key components of an environmental management system (EMS). These key components are dealt within the following sections of the MS manual:

2. **Management and Staff Responsibilities**
3. **Resource Management**
4. **Operations and Maintenance**
5. **Emergency Planning**
6. **Environmental Management System**

1.3 DISTRIBUTION AND AUTHORISATION RECORDS

1.3.1 It is the overall responsibility of the **Technically Competent Manager** to authorise the MS and to ensure that it is reviewed and maintained such that it remains fit for purpose.

1.3.2 The controlled distribution of the MS manual is detailed in Table 1.

1.3.3 Copy No 1 will be retained at the Site Office. Copy No 2 will be retained by the Technically Competent Manager as the "Master Copy".

1.3.4 Issue of controlled copies can either be completed via email direct to the recipient, or in hard copy using the issue receipt in Table 2 overleaf.

1.3.5 Acknowledgement of receipt must be obtained from the recipient. If the MS manual is issued electronically this should be via return email, and if the MS manual is issued in hard copy, the recipient should complete the issue receipt in Table 2 and return the photocopied page. **This acknowledgement must be retained in the Miscellaneous Appendix of the Master Copy of the MS manual.**

Table 1: Management System controlled copyholders

Copy No.	Recipient	Location
1	Site Operative	Site
2	Technically Competent Manager	Site Office

1.3.6 Any revisions made to the "Master Copy" shall be issued to all other controlled copyholders. It is then the responsibility of the controlled copyholder to amend their MS manual as revisions are received.

1.3.7 The document issue status is as indicated in Table 3 in Section 1.4. Dates and scope of revision will be as set out in the updated revision record in Table 3.

Table 2: Controlled Copy Issue Receipt

Copy No.	Recipient	Date Issued	Date Received	Signature*
1	Site Operative			
2	Technically Competent Manager			

* Only if MS is issued in hard copy format

1.4 REVISION RECORD

- 1.4.1 Minor changes to the MS manual (e.g. changing a name on the organisation chart) do not require a re-brief of the MS manual to the site staff. These can be recorded below by entering the issue number and AMD, e.g. 1 (AMD).
- 1.4.2 Major changes, or six subsequent minor changes, do require a full briefing to the site staff and a new issue number.

Table 3: Management System Manual Revision Record

[illegible]

The continuation sheet for this table must be retained in the Miscellaneous Appendix of the Master Copy of the MS manual

1.5 **BRIEFING OF THE MANAGEMENT SYSTEM**

- 1.5.1 This MS manual, and any subsequent revision, must be briefed to all site-based staff, and recorded in Table 5 below. This includes any agency personnel or sub-contractors employed by the Company so as to execute their responsibilities with respect to compliance with the Permit.

Table 5: Management System Briefing Record

Name	Signature	Company	Issue No	Date

The continuation sheet for this table must be retained in the Miscellaneous Appendix of the Master Copy of the MS manual

- 1.5.2 Minor changes to the MS manual (e.g. changing a name on the organisation chart) do not require a re-brief of the MS to site staff.
- 1.5.3 Major changes, or six subsequent minor changes, do require a full briefing to the site staff (see Section 1.6 for the current revision status).

Responsibility: It is the responsibility of the **Technically Competent Manager** (or, in his absence, a nominated deputy) to ensure that the MS is communicated to site staff and that this is recorded.

2. MANAGEMENT AND STAFF RESPONSIBILITIES

2.1 MANAGEMENT

2.1.1 The **Technically Competent Manager** has the overall responsibility for:

- introducing the environmental objectives; and
- providing the necessary resources for implementing and improving the MS and meeting associated environmental objectives.

2.1.2 The **Technically Competent Manager** has the overall responsibility for:

- Introducing, reviewing and maintaining this Management System (MS) to facilitate the appropriate operation of this permitted facility.

2.1.3 The **Technically Competent Manager** also has responsibility for:

- ensuring that the Management System requirements are established, implemented, maintained and reviewed;
- setting and agreeing measurable environmental objectives for the Site Staff including their awareness of potential environmental impacts;
- monitoring and managing the day-to-day implementation of the Management System at the site; and
- setting and communicating responsibilities on site.

2.2 OPERATIONAL STAFF

2.2.1 The **Technically Competent Manager** will ensure that all operational staff are aware of the importance of the implementation of the Management System and their responsibilities towards this.

2.2.2 Individual responsibilities are set out within this MS manual and operational staff have a duty to fulfil these specific responsibilities. Regardless of particular assigned responsibilities, operational staff have the overarching responsibility to ensure that the Management System is properly and consistently implemented, that any and all deviations are reported and that any defined environmental objectives are met.

2.3 ALLOCATION OF RESPONSIBILITIES

2.3.1 The allocation of responsibilities for the tasks that comprise the Management System is set out within this MS manual and the associated appendices.

2.4 ENVIRONMENTAL POLICY

2.4.1 The COMPANY is committed to ensuring that its activities are conducted in accordance with sound environmental practices, with a Policy included as Appendix MS7.3. **RESOURCE MANAGEMENT**

3.1 STAFFING

- 3.1.1 The Company will ensure that the necessary staff resources are available at all times to implement and improve the MS for the operation of the facility.
- 3.1.2 When considering staff resources, the Company will ensure that all staff are competent to fulfil their relevant role on the basis of applicable experience, skills, education and training.

Responsibility: it is the responsibility of the **Technically Competent Manager** to identify the requirement for and calibre of staff to implement the MS.

3.2 ORGANISATION

- 3.2.1 The organisational structure relevant to the operation of the Facility is fairly simple, with the operatives on site undertaking waste activities reporting to the Technically Competent Manager.

Administrative support is provided through a number of office staff who undertake the financial, HR and other support functions.

3.3 STAFF TRAINING

Implementing the Management System

- 3.31 The MS manual will be communicated to the staff identified in Section 3.2.1, as well as any agency personnel or sub-contractors, as required.
- 3.3.2 To ensure the MS can be implemented effectively and efficiently, all relevant site and office-based staff, including any agency personnel or sub-contractors, will need to be trained as respects the requirements of the MS, and the associated Accident Management Plan, as it affects those individuals' work activities and responsibilities.

Training Needs Assessment

- 3.3.3 **Training needs assessment:** all operatives and any contractors, including agency staff, working at the facility will need specific environmental awareness training. In essence, these are anyone driving the site machine(s) and operators of any mobile plant/equipment on the permitted facility. Office-based staff do not need the same level of training in environmental awareness and their training needs will be assessed separately, where appropriate.
- 3.3.4 **Key posts:** these have been identified as the site operatives and technically competent manager.
- 3.3.5 **Environmental permit awareness:** both operational and any office-based staff will need to be trained as respects the requirements of the Permit conditions as they affect the individuals' work activities and responsibilities; this will be recorded and training records retained at **Appendix MS5**. Refresher training

will be given at least annually.

- 3.3.6 **Review:** the training needs assessment and training programme will be reviewed at least annually and the outcome recorded. The current training programme and records will be provided at **Appendix MS5**.

Responsibility: the **Technically Competent Manager** is responsible for undertaking and recording the training needs assessment and recording any training undertaken, whether internal or external.

General Training Requirements

- 3.3.7 In addition to any training specific to their role in implementing the MS and AMP and complying with the conditions of the Permit, the following general training requirements have been identified and will be implemented and recorded:

- a) Site machine drivers/operators engaged at the site will be appropriately trained in the operation of the site machine(s) and this will include relevant health and safety aspects. The training will be provided by approved instructors (either internal or external).
- b) Additionally, site machine drivers/operators will receive training in the environmental impacts that may be caused by the operation of plant and equipment under their control in normal and abnormal circumstances. Refresher training will be given at least annually.
- c) Office-based staff will need to be competent to use the telecommunication and information technology (IT) systems, specifically the computer-based record and document management systems.

- 3.3.8 **Reporting:** all staff will be instructed to report any deviations from the MS, including any and all conditions of the Permit, to the **Technically Competent Manager**; this will include 'near misses'. The **Technically Competent Manager** will then notify the Environment Agency and/or Health and Safety Executive, if appropriate.

- 3.3.9 **Risks from contracts work:** all contractors will be issued with appropriate Work Instructions prior to allowing them to start on site. These instructions will include environmental control requirements relevant to their work. Contractors will be instructed to report any incident that they see on the site, or as a result of their own work, that could damage the environment (water, air or land) to the **Technically Competent Manager** (or **nominated deputy** in his absence).

Competence

- 3.3.10 The site activities fall within the requirements of an approved competence scheme; and suitably qualified personnel (or external contractors) will provide the necessary technically competent persons provisions for the operation of the facility. Attendance on site will be logged within the site diary records and **the relevant (copy) certificate(s) will be retained in Appendix MS5 of the Master Copy of the MS manual**. Continuing competence certification will also be retained in order to ensure that the necessary provisions are being met on an ongoing basis.

- 3.3.11 The standards set out in the CIWM/WAMITAB approved competence scheme as applicable to the operation of an asbestos waste transfer facility will be used for this purpose (4MTSH).

Supporting the Management System

- 3.3.11 In addition to the specific requirements outlined above, the **Technically Competent Manager** will promote the content and importance of the Management System to Site Staff by “toolbox talks” which will be undertaken as deemed appropriate; will evaluate the performance of staff and will discuss proposals for improvements.
- 3.3.12 Staff will be encouraged to contribute their suggestions for improvements to this Management System. The **Technically Competent Manager** will have the role of reviewing suggested improvements and incorporating into the MS manual, where appropriate.
- 3.3.14 It is recognised that contractors can be a significant contributor to the environmental impact of the activities undertaken on site, therefore they will be clearly inducted onto the site to ensure that they are aware of their roles and responsibilities in relation to the permit and this management system.

4. OPERATIONS AND MAINTENANCE

4.1 GENERAL OPERATIONAL COMMITMENTS

- 4.1.1 **Commitment:** The Company is committed to operating its facilities in a manner that will minimise potential impacts to the environment.
- 4.1.2 **Site inspection:** The Company is committed to undertaking checks and inspections of its site plant, equipment and work activities that might have an adverse impact on the local environment. This is to be undertaken and reported on a working daily basis. **Appendix MS1** provides examples of the reporting forms that we will use for both plant and the facility. Inspections will be on a nil reporting basis – that is, if nothing untoward is found, a record will still be made.

Responsibility: It is the responsibility of the **Site Staff** to undertake the site inspections on a daily basis and the responsibility of the **Technically Competent Manager** (or nominated deputy in their absence) to ensure the Report Forms are completed and any identified exceptions are dealt with or reported to senior management for further action, as appropriate.

- 4.1.3 **Operational procedures:** As a Standard Rules Environmental Permit an Environmental Risk Assessment has been prepared (PAR/03/0915) to identify the aspects that demand particular attention as: waste acceptance and fugitive emissions (particularly dust and mud on the roads). The general operational procedures, including waste acceptance procedures, for the facility are provided at **Appendix MS2**; additional specific procedures are also provided at **Appendix MS3** (fugitive emissions and spillage) as well as the other measures

set out in the associated Accident Management Plan (AMP), a copy of which is also held on site.

The Company commitment (4.1.1) informs the day to day operation of the site and in particular the application of the Waste Hierarchy as required by the Waste (England & Wales) Regulations 2011. Wherever practical the following hierarchy will be applied:

Prevention/Reduction

Preparing for Re-Use

Recycling

Other Recovery

Disposal

Users of the site will be instructed on the requirements necessary to facilitate the waste hierarchy, such as waste segregation.

- 4.1.4 **Monitoring procedures:** see Site Inspections at Section 4.1.2 and Operational Procedures at Section 4.1.3, as well as **Appendix MS2** and **Appendix MS3** as well as other relevant procedures set out within the associated Accident Management Plan.

Responsibility: It is the responsibility of the **Technically Competent Manager** (or nominated deputy in their absence) to ensure that the site monitoring is undertaken by the Site Staff and any identified issues are dealt with or reported for further action, as required.

- 4.1.5 **Site security:** the site is small and is enclosed and contained within a secure business unit. Vehicle access is limited by the site of the site and is controlled by fences. This will be part of the site inspection at Section 4.1.2.

4.2 PLANNED PREVENTATIVE MAINTENANCE

Provision of Plant and Equipment

- 4.2.1 **Provision of plant and equipment:** the Company will ensure that appropriate plant and equipment are provided for the operations undertaken at the Facility. Plant and equipment permanently based at the facility is limited and will normally be owned by the company, or will be hired as appropriate from reputable suppliers.

Scope and Requirement for Planned Preventative Maintenance

- 4.2.2 Many pollution incidents reported to Natural Resources Wales can be traced back to a maintenance failure. It is important, therefore, that the MS includes a plan for proactive and preventative maintenance of the plant and equipment used on the site.

4.2.3 **Inclusion in the Planned Preventative Maintenance (PPM) programme:** all plant and equipment that have recommendations, provided by the manufacturer, supplier or installer, for preventative maintenance will be deemed to have been identified as falling within this section.

4.2.4 Any plant and equipment that do not have specific recommendations will be reviewed and assessed as to the appropriate maintenance measures. Any and all equipment deployed permanently at the facility will take first priority as respects their maintenance. Those brought to the facility on an occasional basis will take second priority, until they are about to be deployed at the facility when their maintenance record will be examined for compliance.

Responsibility: It is the responsibility of **Technically Competent Manager** to identify the appropriate maintenance measures for plant and equipment that do not have specific maintenance requirements.

4.2.5 **The Planned Preventative Maintenance (PPM) programme:** for the majority of items of plant and equipment the programme of maintenance will be that recommended by the manufacturer, supplier, installer or, in the absence of which, as devised by **the Technically Competent Manager**, in consultation with others.

Responsibility: It is the responsibility of the **Technically Competent Manager** to ensure that the PPM regime is implemented and any identified maintenance issues are dealt with or reported to senior management for further action, as required.

4.2.6 In addition to any Planned Preventative Maintenance regime for plant and equipment identified under Section 4.2.5, there is also a commitment to check such items on a working daily basis – see commitment under Section 4.1.2.

Testing and Inspection

4.2.7 In addition to any PPM programme for plant and equipment identified under Section 4.2.3, there is also a commitment to check such items on a working daily basis – see commitment under Section 4.1.2.

Responsibility: **Site Staff** are responsible for checking items on a working daily basis and recording the findings on the check sheets provided.

4.2.8 Results of inspections by the Site Staff are to be compiled on a working daily basis by the **Technically Competent Manager** for action, as appropriate.

Responsibility: the **Technically Competent Manager** will ensure that resources are made available to address the findings of audits/ inspections.

4.3 AUDITING

4.3.1 **Availability of audit results:** audit results are compiled by the Site Staff on a working daily basis (Section 4.1.2) and reported to the **Technically Competent Manager** for action, as appropriate. Any audits/inspections undertaken by third

parties will also be made available to the **Technically Competent Manager**.

- 4.3.2 Environmental performance auditing:** the site activities are relatively simple and as such environmental performance auditing is not deemed to be appropriate, nevertheless, the Company will conduct a formal review at least annually. A record of any significant updates made to the Management System as a result of the audit will be retained in Table 3.

5. EMERGENCY PLANNING

5.1 ACCIDENT MANAGEMENT PLAN

- 5.1.1 Accident Plan:** the potential environmental impacts of the operations at the site, their consequences, preventative management measures and emergency actions to take in the event of an occurrence are all identified in the Accident Management Plan for the facility, a copy of which is held on site (PAR/05/1113).

- 5.1.2 Training:** the procedures set out within the Accident Management Plan will be communicated clearly to all employees and contractors who work at the facility. This will form part of the training of all staff set out in Section 3.3.2.

5.2 INCIDENT REPORTING

- 5.2.1 Referrals by Site Staff:** any referrals made in accordance with Section 3.3.8 will be addressed to and assessed by the **Technically Competent Manager** (or authorised deputy). They will be investigated and any remedial action, if required, implemented and reported, if appropriate, to the Environment Agency and/or Health & Safety Executive.

- 5.2.2 Complaints:** any complaints about the site operations and/or its impact on the environment made by third parties (including Contractors in accordance with Section 3.3.9) will be passed to the **Technically Competent Manager** (or authorised deputy) in the first instance. They will then make a note of the complaint in the complaints register in the Site Diary (**Appendix MS4**) and either resolve it or take other actions as may be appropriate, such as referring it to the Regulator. All investigations and remedial actions taken following such reports will be recorded in writing.

- 5.2.3 Incident reporting:** all incidents reported in accordance with Sections 3.3.8, 3.3.9, 5.2.1 and 5.2.2 will be investigated by the **Technically Competent Manager** (or authorised deputy). If necessary, suitable corrective action will be ordered and monitored as to its effectiveness and completion. This procedure will be iterated until satisfaction is assured. Any reporting to Natural Resources Wales and/or Health and Safety Executive will be undertaken by, or on the instruction of the **Technically Competent Manager**. All reports under this Section will be recorded in writing using form PAR/21/1113 (**Appendix MS5**).

5.3 AUDITING AND REVIEW

- 5.3.1 **Audit trail:** the reports made under Section 5.2.3 will be made in writing and the **Technically Competent Manager** will ensure that every complaint, incident and investigation is followed up until signed off as having been dealt with satisfactorily.
- 5.3.2 **Review:** the effectiveness of the emergency planning regime, and the associated Accident Management Plan, and the need for any improvements will be reviewed at least annually as part of the environmental performance audit (see Section 4.3.2).

6. ENVIRONMENTAL MANAGEMENT SYSTEM

6.1 INTRODUCTION

- 6.1.1 Owing to the nature of the operations undertaken at the facility, it is not considered necessary to have an environmental management system (EMS) that is externally accredited; instead a simple EMS has been adopted and is set out below.

6.2 ENVIRONMENTAL RESPONSIBILITY

- 6.2.1 The Company ("Pilkington Asbestos Removal Services Ltd") will be the Permit holder for the facility and as the site Operator, will also be responsible for the implementation and operation of the permit.

6.3 PLANNING

- 6.3.1 The annual environmental performance audit (see Section 4.3.2) will be used to identify and list those environmental aspects of the activities that are within our control and over which we can be expected to have influence. The potential for these aspects to have an adverse impact upon the environment will be reviewed with the Environmental Risk Assessment (PAR/03/0915).
- 6.3.2 Our procedure for the identification of, and access to, legal and other requirements that are applicable to the environmental aspects of our activities is through regular reviews of formal information sources, to include the Environment Agency/Natural Resources Wales, Business Links, CIWM and DEFRA, as required.

A list of relevant legislation is included as Appendix MS8.

- 6.3.3 The annual environmental performance audit (see Section 4.3.2) will be used to establish and maintain any identified improvements. This will include designation of responsibility for achieving any improvements at each relevant function and level of our organisation and the means and time-frame by which they are to be achieved.

6.4 IMPLEMENTATION AND OPERATION

- 6.4.1 The annual environmental performance audit (see Section 4.3.2) will be used to define, document and communicate roles, responsibilities and authorities in order to facilitate effective environmental management. We shall provide sufficient resources essential to the implementation and control of the Management System.
- 6.4.2 The **Technically Competent Manager** will have the defined role, responsibility and authority for ensuring that Management System requirements are established, implemented, maintained and reviewed.
- 6.4.3 We have identified training needs (see Section 3.3) and will ensure that all personnel whose work may create a significant impact on the environment have received appropriate training (see Section 3.3).
- 6.4.4 We have established and shall maintain procedures to make our employees for each relevant function and level aware of the importance of the general environmental responsibility and of complying with the requirements of the Management System; in particular the following:
- the potential environmental impacts of their work activities;
 - their roles and responsibilities in achieving compliance including emergency preparedness and response; and
 - the potential consequences of departure from specified operating procedures.
- 6.4.5 We have established and will maintain procedures for internal communication between the various levels and functions of the organisation and for receiving, documenting and responding to relevant communications from external interested parties (see Section 5.2).
- 6.4.6 The annual environmental performance audit (see Section 4.3.2) will be used to identify those operations and activities that are associated with any identified significant environmental aspects. These activities will be planned, including maintenance, in order to ensure that they are only carried out under appropriate conditions (see whole of Section 4).
- 6.4.7 Before any process change is implemented at the facility or new infrastructure installed, the **Technically Competent Manager** will assess the potential environmental benefits and/or adverse impacts. Capital approval and purchasing will be guided by the results of these assessments, having regard to our commitment for continual environmental improvement.
- 6.4.8 We have established and will maintain our procedure to identify potential for and respond to accidents and emergency situations and for preventing or mitigating the environmental impacts that may be associated with them (see whole of Section 5).

6.5 CHECKING AND CORRECTIVE ACTION

- 6.5.1 The annual environmental performance audit (see Section 4.3.2) will be used to monitor and measure, on a regular basis, the key characteristics of the operations and activities that can have a significant impact on the environment. This will also be used to evaluate compliance with the relevant environmental legislation and regulations.
- 6.5.2 The annual environmental performance audit (see Section 4.3.2) will be used as a periodic system audit in order to determine whether or not the Management System conforms to our planned arrangements for environmental management and has been properly implemented and maintained.
- 6.5.3 This will also serve to review the Management System to ensure its continuing suitability, adequacy and effectiveness. The review will address the possible need for changes to policy, objectives and other elements of the Management System in the light of audit results, changing circumstances and our commitment to continual improvement. A copy of any amendments proposed to the Management System as a result of the review will be submitted to Natural Resources Wales for approval.
- 6.5.4 The **Technically Competent Manager** will be responsible for handling and investigating accidents or non-compliance, taking action to mitigate any impacts caused and for initiating and completing corrective and preventive action. Under these circumstances the Management System and Accident Management Plan would be reviewed, as soon as practicable, with the result of the review used to inform changes in the documented procedures. A copy of any amendments proposed to the Management System and/or Accident Management Plan as a result of the review will be submitted to Natural Resources Wales for approval. A record of any significant updates made to the Management System will be recorded in Table 3.
- 6.5.5 The Management System and Accident Management Plan will also be reviewed if there is a significant change to the activities undertaken at the facility; such as a change in the nature of activities or major re-structure affecting the roles and responsibilities identified within the Management System. This review will be informed by an appropriate assessment of risk. A copy of any amendments proposed to the Management System as a result of the review will be submitted to Natural Resources Wales for approval. A record of any significant updates made to the Management System will be recorded in Table 3.

- **APPENDICES TO THE MANAGEMENT SYSTEM**

MS1 Site Inspection and Mobile Plant Checklists

MS2 Operation Procedures

MS3 Procedure to Minimise Fugitive (Dust) Emissions; Drainage and Spillage Procedure

MS4 Complaints Register

MS5 Training and Competence Records

MS6 Environmental Incident Report and Record

MS7 Environmental Policy

MS8 Legislation Register

MISCELLANEOUS

APPENDIX MS4: COMPLAINTS REGISTER

This section contains a copy of the blank Complaints Register. A copy will be maintained as part of the facility diary records.

APPENDIX MS1: SITE INSPECTION PROCEDURES AND RECORDS

This section contains a copy of the procedures used for the inspection of the facility and the associated Site Inspection Check List and Daily Plant Inspection Check List; a copy of each must be inserted behind this cover sheet. Completed copies will be retained as part of the facility diary.

APPENDIX MS6: ENVIRONMENTAL INCIDENT RECORDS

This section contains blank copies of the Environmental Incident Records, to include the form completed (PAR/21/1113) and also the diary record sheet (PAR/19/1113). Working versions will be retained in the Site Diary.

APPENDIX MS7: ENVIRONMENTAL POLICY

This section contains the Environmental Policy for the Company. This will be communicated through the corporate website, or directly to external parties as deemed appropriate.

Miscellaneous Appendix

Miscellaneous documents which are relevant to the MS, but do not have a specified location, should have their details entered in the table below and then be inserted in to the MS manual behind this page.

Table 9: Miscellaneous documents added to the MS Manual

[illegible]

Pilkington Asbestos Removals Ltd

Environmental Policy Manual

Introduction

Purpose

At Pilkington Asbestos Removals Ltd (PARS), our aim is developing and maintaining a first class environmentally responsible culture within our company. This is driven by our goal for zero pollution incidents which is a key objective within the business.

PARS Ltd remains focussed on developing a positive and proactive environmental culture, not only for our own people, but also for our suppliers and subcontractors.

Caring for people, the community and the environment is at the heart of all we do and is a key value within our business.

The purpose of this document is intended to provide information to all PARS Ltd employees on the company's organisation and arrangements for environmental management to ensure our impacts are minimised, and to set out management and employee responsibilities to achieve this.

This document has been prepared to define the way PARS Ltd intends to manage environmental issues and meet the requirements of ISO14001, which is summarised as follows:

- To establish an environmental policy that is appropriate to PARS Ltd
- To identify the legislative and regulatory requirements relevant to the organisations environmental compliance.
- To identify the environmental aspects (risks) arising from the company's past, existing or planned activities or services determine the environmental significance of those aspects (risk) and introduce control measures to manage environmental impacts.
- To identify priorities and set appropriate environmental objectives and targets.
- To establish a structure, procedures and programme to implement the policy and achieve the objectives and targets.
- To define responsibilities and provide resources for planning, control, monitoring, corrective action, auditing and review of activities to ensure both that the policy is complied with and that the Environmental Management System remains appropriate.

Environmental Policy Statement

PARS Ltd recognises the importance of environmental protection and is committed to operating its business responsibly and in compliance with legal requirements, the company is registered and certified under BS EN ISO14001 – 2004.

The company is committed to reducing our environmental impact and continually improving our environmental impact and continually improving our environmental performance as an integral part of our business strategy and operating methods.

The company encourages our customers, suppliers and all business associates to do the same. Not only is this sound commercial sense for all; it is also a matter of delivering on our duty of care towards future generations.

It is the company's declared policy to operate with and to maintain good relations with all regulatory bodies.

It is the company's objective to carry out all measures responsibly practicable to meet, exceed, develop and continually improve our environment performance through the implementation of the following:

- PARS Ltd directors, managers and supervisors will provide visible leadership in Environmental matters and consider the environment as an integral part of business.
- PARS Ltd will assess our activities to minimise impacts from significant environmental aspects including:
 - Waste
 - Releases to water
 - Contamination of land
 - Nuisance and amenity
 - Emissions to air
 - Carbon emissions
 - Archaeology and local history
 - Wildlife
- Support and comply with or exceed the requirements of current environmental legislation and codes of practice.
- Ensure that all employees understand our environmental policy and conform to the high standards it requires.
- Minimize waste and then reuse or recycle as much of it as possible.
- Minimize energy and water usage in our buildings, vehicles and on site in order to conserve supplies, and minimize our consumption of natural resources, especially where they are non-renewable.
- Operate and maintain company vehicles with due regard to environmental issues as far as reasonably practical and encourage the use of alternative means of transport wherever possible.
- Apply the principles of continuous improvement in respect of air, water, noise and

light pollution from our premises and reduce any impacts from our operations on the environment and local community.

- As far as possible purchase products and services that do the least damage to the environment and encourage other to do the same.
- Assess the environmental impact of any new process or products we intend to introduce in advance.
- Address complaints about any breach of our Environmental Policy promptly and to the satisfaction of all concerned.
- Update our Environmental Policy annually in consultation with staff, associates and customers.
- The PARS Ltd BS EN ISO 14001:2004 will be maintained and will be internally audited as well as verification from the external certificated body.
- This policy is communicated to all employees, suppliers and sub-contractors and is made available to the public upon request.

.....
Derek Pilkington
Managing Director

.....
Date

Reviewed 6th January 2014

Statement of Intent

To support our environmental policy and objectives we are committed to responsible business practices in the following environmental areas and as such, are developing programmes and procedures to improve our performance.

Carbon Footprint and energy efficiency

Our approach to a reduction in carbon footprint is focussed on our most significant contributions which are transport and site fuel use. Key areas where improvements will need to be made in transport include reducing mileage, increasing fleet efficiency, improving driver behaviour and the amount of vehicles required to each specific area of works.

Sustainable Procurement Policy

The materials we use during the asbestos removal projects and within the office, contribute to our environmental performance and as such we recognise the contribution sustainable materials make to improved environmental performance. We have already contributed significantly in this area by developing and setting objectives, to increase the amount of recycled materials we use. We will continue to support initiatives and activities to minimise waste materials by setting clear targets to increase the amount of waste diverted from landfill, thereby improving our resource efficiency.

We are committed to improving the way we procure other materials such as vehicles, fuel, utilities, water and office consumables to ensure they are sourced through responsible environmental credentials.

As such we will develop mechanisms to:

- Enhance employee awareness of relevant environmental and social effects of purchases through appropriate training.
- Provide guidance and relevant information to employees to allow them to select sustainable products and services.
- Give preference to products and services that can give value and can be manufactured, used and disposed of in an environmentally and socially responsible way.
- Work with existing and potential suppliers to investigate and introduce responsible process and products.
- Develop sustainability criteria that can be included in specifications to suppliers including the following:
 - Health and Safety
 - Environmental protection
 - Quality management
 - Equality and Diversity
 - Ethical sourcing – including human and employee rights, corruption and competition.
- Ensure that sustainability criteria are considered in the placing of orders.

Resources, responsibilities and authority

Managing Directors

Responsibilities include:

- Ensure that there is an up to date Environmental Policy and that it is brought to the attention of all employees.
- Ensure that the company are operating in accordance with ISO14001.
- Ensure there are instructions for the organisation and methods for carrying out the company policy and make sure that each person is aware of their responsibilities and the means by which they can carry them out.
- Institute reporting, investigation and costing of incidents. Promote analyses of investigations to discover the root causes and trends to eliminate risks and to ensure the prevention of recurrence.
- Ensure adequate personal knowledge and understanding of environmental matters and arrange training where required.
- Ensure suitable disciplinary measures are conducted on individuals that fail to discharge satisfactorily their responsibilities for environmental protection.
- Arrange regular meeting with staff to discuss company performance and improvement areas.
- Ensure environmental arrangements and responsibilities have been identified, formulated and implemented by direct reports.
- Ensure sufficient resources are available to allow the business to fulfil its environmental obligations.
- Ensure that objectives are set, targets identified and monitored in line with the ISO14001:2004.
- Ensure that significant environmental risks and performance is reported internally and externally.
- Ensure office managers and supervisors have received adequate environmental training to enable them to fulfil their responsibility in line with the requirements of this policy.
- Ensure sufficient resources are available to allow the business unit and department to fulfil its statutory environmental obligations.
- Ensure adequate personal knowledge and understanding of environmental matters.
- Ensure suitable processes are in place to induct new employees into the business.
- Where environmental knowledge and understanding is below an acceptable standard, ensure appropriate training is put in place.
- Ensure suitable disciplinary measures are conducted on individuals that fail to discharge satisfactorily their environmental responsibilities.

Supervisors and Site Supervisors

- Ensuring staff under their control have received adequate training to enable them to fulfil their responsibilities in line with the requirements of this policy.
- Ensure sufficient resources are in place to fulfil the business' statutory environmental obligations.
- Reporting to the Managing Directors any environmental issues or concerns that may arise.
- Responsible for the implementation and monitoring of agreed control measures within the company and on site, to effectively ensure environmental protection.

All staff and Site Operatives

- Co-operate with managers on environmental matters.
- Not interfere with anything provided to protect the environment.
- Report all environmental concerns to an appropriate person.
- Seek further advice from supervisors as required.
- Ensure that environmental issues are properly considered for persons under the direct control.
- Contribute in reducing incidents and waste as an integral part of the business process.

Pilkington Asbestos Services Ltd recognises the importance of environmental protection and is committed to operating its business responsibly and in compliance with all legal requirements relating to asbestos removal contracting. It is the Organisation's declared policy to operate with and to maintain good relations with all regulatory bodies.

It is the PARS objective to carry out all measures reasonably practicable to meet, exceed or develop all necessary or desirable requirements and to continually improve environmental performance through the implementation of the following:

- Assess and regularly re-assess the environmental effects of the Organisation's activities
- Training of employees in environmental issues
- Minimise the production of waste
- Minimise material wastage
- Minimise energy wastage
- Promote the use of recyclable and renewable materials
- Reduce and/or limit the production of pollutants to water, land and air
- Control noise emissions from operations
- Minimise the risk to the general public and employees from operations and activities undertaken by the Organisation

This Policy is communicated to all employees, suppliers and sub-contractors and is made available to the public.



Certificate No. OCC4781

Operator Competence Certificate

Qualification Title:

Managing Transfer - Hazardous Waste - 4MTSH

This Certificate is awarded to

Derek Pilkington

Awarded: 03/04/2014

Authorised

WAMITAB Chief Executive Officer

CIWM Chief Executive Officer

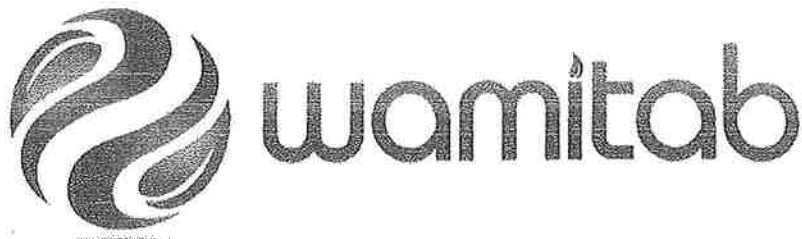


The Chartered Institution
of Wastes Management

This certificate is jointly awarded by WAMITAB and the Chartered Institution of Wastes Management (CIWM) and provides evidence to meet the Operator Competence requirements of the Environmental Permitting (EP) Regulations, which came into force on 6 April 2008.



00054024



Qualification Title:

**WAMITAB Level 4 Diploma In Waste Management Operations : Managing
Transfer - Hazardous Waste (QCF) - 4MTSH**

Qualification Accreditation Number:

600/0436/8

This Certificate is awarded to

Derek Pilkington

Awarded: 03/04/2014

Serial No:24703/4MTSH/1

Authorised

Ray Burberry
Qualifications Manager, WAMITAB



00054207



Credit certificate

This certificate determines credit awarded to:
Derek Pilkington

Units gained:

		Credit Value	Credit Level
Y6015875	Monitor procedures to safely control work operations	4	3
K6009711	Manage physical resources	3	4
M6009712	Manage the environmental impact of work activities	5	4
A6017618	Organise the transportation of loads	5	3
Y6021501	Control work activities on a waste management facility	9	3
A6021670	Manage the movement, sorting and storage of waste	7	3
K6021423	Procedural compliance	6	4
M6021424	Manage and maintain effective systems for responding to emergencies	19	4
D6021435	Control maintenance and other engineering operations	13	4
K6021504	Manage improvements to waste management operations	7	4
F6021606	Manage the reception of hazardous waste	15	4
A6021510	Manage the transfer of outputs and disposal of residues from hazardous waste transfer and recovery operations	11	4

Awarded: 03/04/2014

Serial No.: 24703/HSS3/1

Authorised

Ray Burberry
Qualifications Manager, WAMITAB

Regulated by

Ofqual



For more information see <http://register.ofqual.gov.uk>



Llywodraeth Cymru
Welsh Government

The qualifications regulators logos on this certificate
indicate that the qualification is accredited only for
England, Wales and Northern Ireland.



00054204

