Chatham Freight Limited,
Building 63,
Chatham Docks,
Gillingham Kent,
ME4 4SR

Environmental Management System (EMS)

Original document date 2017

Carried out for:

Chatham Freight Station Limited

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Contents

General Management

Chatham Freight Station Limited (the company) will operate the facility in compliance with the conditions of the site environmental permit and as per the procedures and guidance detailed within this Environmental Management System (EMS). The site will have sufficient resources and competent persons to manage and operate the site giving due consideration to health and safety and the environment.

The permit holder will maintain records of procedural compliance as contained within this EMS. All records will be legible and stored in date order within clearly marked files. All files will be stored within the site office or designated address and made available to regulatory authorities on request.

All operational and managerial staff will be made aware of the conditions contained within the permit and the procedures and guidance contained within the EMS.

A copy of the permit and EMS will be kept in the site office in a clearly marked file.

The appointed Technically Competent Manager (TCM) will be qualified to manage a Low Risk waste management operation and will maintain continued professional competence as required by the Waste Management Training & Advisory Board (WAMITAB).

The TCM's qualification certificate will be made available to the regulator on request.

A site diary shall be maintained throughout the life of the operation and contain as a minimum the following:

- Number of waste loads delivered in a single day
- Number of staff present on site and their duties
- Visits by regulating authorities
- Attendance of the TCP
- Plant in use at the site
- Record of incidents and accidents
- Record of non-conforming waste
- Failure of site plant
- Site closure due to equipment failure or mechanical events
- Spillages of any potentially polluting substances
- Complaints
- Any noteworthy events

Waste Acceptance

All waste materials that enter the site are subject to the waste acceptance procedure contained within this document.

No waste will be accepted that is not permitted by the site permit and stated within this EMS.

All members of staff will be familiar with the Waste Acceptance Procedures and made aware of their duties in respect of its compliance.

Risk assessments

The operator and his staff will be aware of the potential risks posed by the site operation and respond in a positive manner to any possible threat to the environment and local amenities.

Risk assessments will be reviewed periodically and immediately following any incident that has the potential to threaten the environment or pose a breach of the conditions of the site permit. Risk assessments shall be maintained that represent the health and safety requirements of staff and visitors, likewise, environmental risk assessments shall be produced to reflect the potential operational impact.

Vehicle Movement and Control

It is the operator's responsibility to control vehicles entering and exiting the site to ensure compliance with the site permit conditions.

Vehicles delivering waste must be sheeted to ensure containment of the load and respect the speed limit imposed by the operator.

Wheel cleaning facilities are not required as the site is serviced by a solid road and all surfaces are of concrete construction.

Incidents and Accidents

All hazardous liquids that are stored in containers with a capacity that exceeds 5lts will be held in an area that is engineered to prevent leaks or spillage which may cause damage to the environment.

All oils, fuels and lubricants will either be stored in containers that are bunded, double skinned, held on trays or held within an area that has an impermeable surface and sealed drainage.

All containers will be free of leaks and maintained in good condition, dispensing equipment such as funnels, nozzles and jugs will be fit for purpose.

Refuelling and maintenance of plant and machinery will only take place in designated areas.

Any activity that caused the spillage will cease immediately and will only recommence once the spillage has been cleared.

Absorbent materials sufficient to manage the maximum possible volume of spilled material will be retained on site.

Absorbent granules or dried sand will be applied to the area of spillage, the amount applied will be sufficient to absorb any spilt material.

The absorbent material and any item or waste that has been contaminated by the spillage will be bagged and disposed of as hazardous waste.

Servicing or maintenance to site plant will be carried out by competent persons and any substances having the potential to pollute will be removed from site and disposed of in accordance with hazardous waste regulations.

All spillages will be recorded within the site diary.

Permitted Activities

It is proposed that the facility will be permitted to receive non-hazardous waste streams for the purpose of treatment or transfer to another waste disposal or recycling facility, or to disposal, should the end of life status of the waste be reached.

The treatment may consist of mechanical and manual sorting, separation, shredding and baling of waste into different components for disposal or recovery.

No more than the permitted amount of waste per annum will be treated unless the waste stream is received under exemption to permitting. However, waste exemptions shall not co-exist with the permit unless authorisation is received in writing from the regulating authority.

In essence, the following processes will apply at the facility:

- Separating types of mattresses by material type
- Depending on the types of materials, mattresses are then either mechanically separated or manually stripped using specialist tools
- The by-products and materials extracted from the mattresses, such as polyester, foam, cotton and steel are then baled and passed on to other recycling outlets or manufactures to re-start as another product
- Remaining residues are sent to landfill for disposal

The waste types acceptance at the treatment facility are as follows:

Schedule 2 – Waste types

Table S2.1 Permitted waste types and quantities for non-hazardous waste transfer station with physical treatment	
Maximum quantity	**The total quantity of waste accepted at the site for the above activity shall be less than 25,000 tonnes a year.**
Waste code	**Description**
19	Wastes from waste management facilities, off-site waste water treatment plants and the preparation of water intended for human consumption and water for industrial use
19 12	**wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified**
19 12 01	paper and cardboard
19 12 02	ferrous metal
19 12 03	non-ferrous metal
19 12 04	plastic and rubber
19 12 07	wood other than that mentioned in 19 12 06
19 12 08	textiles
19 12 12	other wastes (including mixtures of materials) from mechanical treatment of wastes other than those mentioned in 19 12 11
20	**Municipal wastes (household waste and similar commercial, industrial and institutional wastes) including separately collected fractions**
20 03	**other municipal wastes**
20 03 07	bulky waste

All waste materials entering the site will do so via the weighbridge office and be subject to a pre-acceptance procedure before arriving to ensure wastes conform to the conditions of the site permit.

Whilst vehicles are within the permitting boundary of the site, they shall be governed by the written procedures in force and conditions of the site permit.

Once vehicles have proceeded via the weighbridge and undergone waste acceptance procedures, they will follow the instructions given by the weighbridge clerk. Once this has been checked it will come under the direction and responsibility of the site foreman and his staff.

Waste Acceptance Procedures

Vehicles entering the site will do so via the weighbridge office. The driver will park on the dedicated weighbridge and report to the site office to process the documentation.

All customers using the site will hold a valid waste carriers licence should they be required to do so.

Companies failing to produce a valid waste carriers licence will be refused further tipping facilities until such time that they are registered.

The weighbridge office will keep a copy of the licence of regular customers for reference. Occasional customers will have to prove that they hold a valid waste carriers licence.

Duty of Care Waste Transfer Note

All customers will have to show a copy of their duty of care document to the weighbridge staff.

The member of staff will check the material description and EWC code and confirm that this material is acceptable within the permit conditions.

Should the transfer note either not include a EWC code or that code be deemed to be incorrect then appropriate communications to the customer to rectify the transfer note will be made. It is not permissible for the weighbridge clerk to alter the EWC code entered on the transfer note by the producer, unless this is done in conjunction with the producer based on previous verification.

The weighbridge clerk will then sign the duty of care document and retain a copy.

When all relevant checks are complete, the weighbridge clerk will produce a weighbridge ticket that confirms the duty of care details and includes quantities of waste carried in tonnes.

Waste transfer notes will include the following as a minimum:

- Waste producer's details
- Waste carrier's details and registration reference
- EWC Code and description of the waste
- Date
- Disposal site details
- Signature
- Volume / weight

The weighbridge clerk will issue a weighbridge ticket after completing all the required areas on the ticket, a copy will be given to the driver. A copy of the customer's duty of care will be retained with the reception ticket.

Export of Waste

All processed waste that is exported from site will be subject to the relevant duty of care requirements and in the case of international shipments, will comply to Trans-frontier Shipment regulations or Article 18 controls.

Visual Inspection of The Load

When the customer has tipped the load, it will be immediately inspected by a site operative.

The operative will inform the customer that the load is compliant or non-compliant.

If the load is non-compliant with the permit conditions then the rejected load procedure will be followed.

If part of a load is found to be non-compliant then the non-compliant element will be stored within a quarantined area for subsequent disposal to a suitably licensed facility.

A record will be made in the site diary of any non-complete loads or parts thereof.

Noise and Vibration

All site plant will be maintained in accordance with the manufacturers instruction and not operated if found defective. The operator shall implement a formal maintenance programme for all site plant, this may take the form of a Repair and Maintenance contract with the supplier or local arrangements for older equipment.

All mobile plant are fitter with rubber tracks or tyres to prevent noise and vibration.

All drivers and operators will conduct their activities in a manner to minimise the emission of noise and the use of horns will be discouraged unless used in emergency situations.

Travel speed within the site is 5mph.

There will be no loud music on the site.

Welfare Facilities

Welfare facilities are provided for site staff in the form of a mobile canteen and portable toilet.
The operator will have full first aid facilities in case of accidents. A member of staff will be designated and available as the site first aider with their photo prominently placed within the site office and canteen.

Complaints

Should complaints be received pertaining to the operation and site activities, these will be recorded in the site diary, communicated to the TCM and / or site manager for investigation and action where necessary. The relevant regulating authority will also be informed if deemed necessary. The site operates a complaints procedure which shall be adhered to under these circumstances.

Polluting substances

It is not anticipated that polluting substances will occur on site as the waste acceptance procedures will actively prevent the potential from imported waste materials. Plant and machinery will be maintained fit for purpose and substances used in scheduled maintenance and servicing will be removed from site.

Fuel tanks will be bunded (secondary containment) to 110% of the capacity of the tank and filling equipment shall be maintained fit for purpose.

Spillage

Prevention

All hazardous liquids that are stored in containers with a capacity that exceeds 5lts will be held in an area that is engineered to prevent leaks or spillage which may cause damage to the environment.

All oils, fuels and lubricants will either be stored in containers that are bunded, double skinned, held on trays or held within an area that has an impermeable surface and sealed drainage.

All containers will be free of leaks and maintained in good condition, dispensing equipment such as funnels, nozzles and jugs will be fit for purpose.

Refuelling and maintenance of plant and machinery will only take place in designated areas.

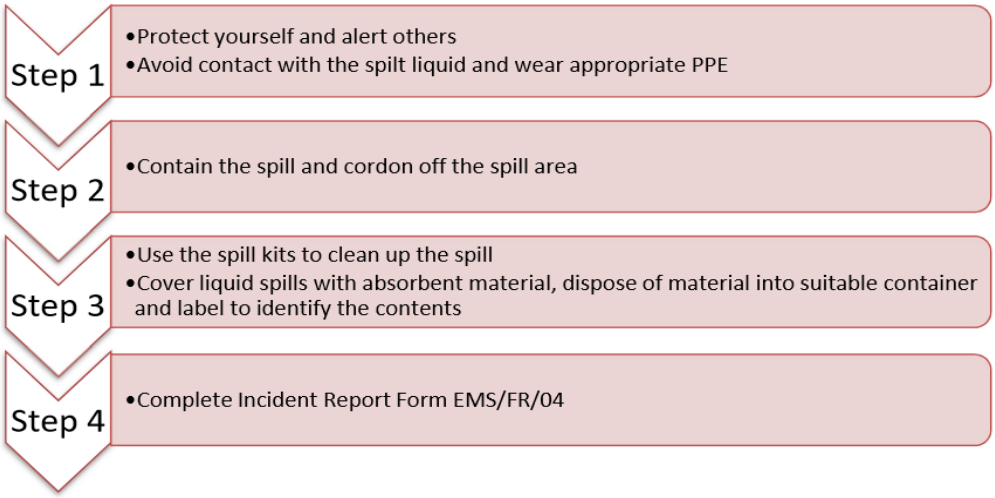
In the Event of Spillage

The activity that caused the spillage will cease immediately and will only recommence once the spillage has been cleared.

Absorbent granules or dried sand will be applied to the area of spillage, the amount applied will be sufficient to absorb any spilt material.

The absorbent material and any item or waste that has been contaminated by the spillage will be bagged and disposed of as hazardous waste.

Minor spills.



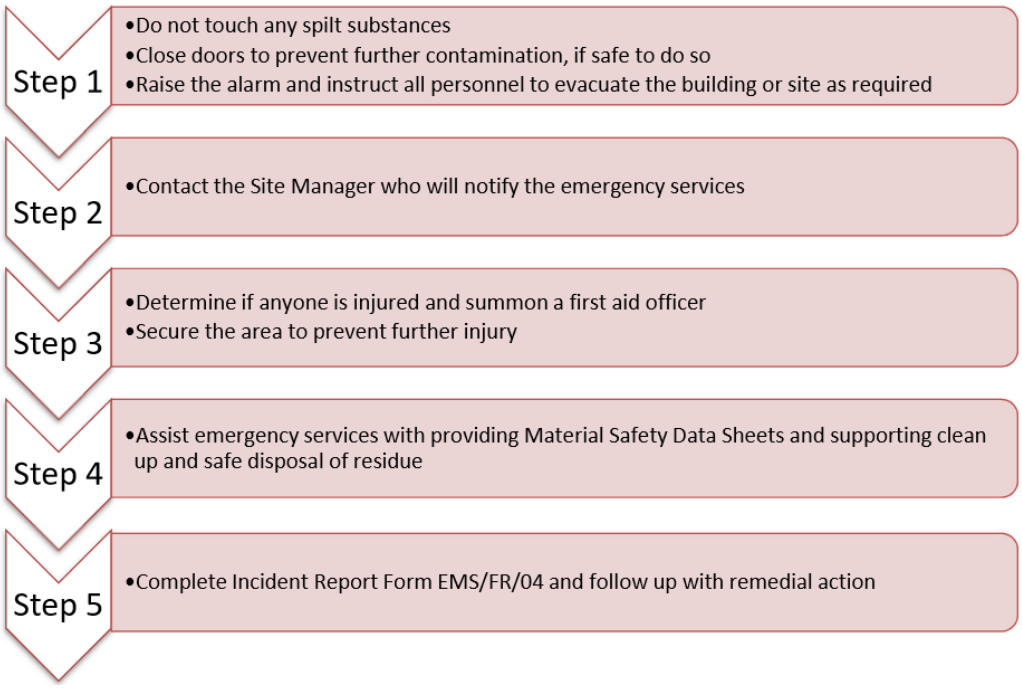
Spill Kits

Spill kits will be maintained at the facility in order to respond to any spill incident. The spill kits will include:

- absorbent granules or sand;
- protective overalls;
- chemical/oil resistant gloves;
- chemical/oil resistant goggles; and
- a broom and shovel

Major Spillage Procedure.

A major spill is one that cannot be contained safely with the material on site and threatens safety to life.



Investigations & Notifications - Spillage

All spillages will be recorded within the site diary.

Any spillage which results in an escape of hazardous material from the site through overflowing the boundaries or via the drainage system will be reported to the Environment Agency immediately.

Any spillage of liquid that is estimated to exceed 10lts will be investigated by the site supervisor and the results of the investigation will be recorded in writing together with recommendations in report format.

Working Restrictions

The facility has no restriction of operation due to its location within Chatham Docks and will continue to operate in this manner. However, waste inputs usually occur between 7.00 and 18.00 Monday to Friday. The period between 18.00 and 5.00 will be used for processing mattresses and textiles in readiness for export for further treatment.

Waste Reception and Storage

All materials received at the site which are classified as non-hazardous and require treatment under the permit will be tipped within the waste reception or storage area.

The site is impermeably paved with reinforced concrete and a sealed drainage system. Waste reception and storage will only be conducted within areas of the site with impermeable surface.

All waste treatment activities are undertaken undercover of the building. Only baled metal waste is stored outside.

No waste will be stockpiled to a height exceeding 4m.

The maximum pile size will not exceed 750m3 for loose and baled waste. The actual waste pile sizes are stipulated in the Fire Prevention Plan which should be read in conjunction with this document.

Where circumstances dictate that no waste storage is available below the stipulated height or more than the stipulated volume, then the site will be closed for the purposes of waste reception until such time as sufficient storage is available.

Material will be removed from this area for storage, segregation or treatment as previously described within the general operations section.

Materials deposited at the site will be processed in date order with feed stock to the treatment process being continually rotated in sequence i.e. oldest first. In the event of a build-up of excessive materials that are likely to result in prolonged storage then material input to the facility will be restricted and additional resources will be employed to rectify the situation.

Waste shall only be sent for disposal if no further treatment is viable or circumstances dictate that such disposal is required to prevent a breach of the permit and/or uncontrolled emissions

Materials will be loaded from the storage bay in rotation to avoid prolonged storage. Additional resources will be employed to reduce any excessive stockpiling should the need arise.

Materials will be stored in a manner that do not compromise the health and safety of persons working within the site.

To prevent stagnation of material and maintain a continual throughput it is proposed to store certain baled waste in the open in readiness for transport from site. Stored material will consist of the following waste types only:

- Baled metal springs
- Baled metal pocket springs retaining material covering

The bales will be wire wrapped and stored no higher than 4 metres to ensure stability is maintained.

Throughput

The facility will only accept permitted waste streams and the total annual tonnage will not exceed 25,000 tonnes per annum.

Emissions and Monitoring

All materials received at the facility under the conditions of the permit will be deposited within the waste reception and treatment areas which are permanently under cover.

The waste reception area will be inspected daily for fugitive waste and all areas shall be kept clean and free from debris.

Repairs or cleaning will be instigated without delay and a note made in the site diary.

All liquids will be stored as per the preventative measures detailed within the Accident Management Plan contained within this EMS.

The Company will submit to the Environment Agency an emissions management plan if requested to do so within an agreed period of time.

The requirements of any such plan will be implemented once the plan has been formally approved by the Environment Agency.

All site operations and activities will be controlled for purpose of reducing the likelihood of accidents.

All hazards will be risk assessed to enable the incorporation of best available techniques and therefore minimise the risk to human health and the environment.

Environmental risk assessments have not identified odour and noise as potential nuisance factors; therefore, these do not require specific consideration by production of individual management plans.

Fire Prevention

The Site shall fall under the governance of the Fire Prevention Plan (FPP) prepared by Ravenswood Environmental Support Services, dated June 2017. The FPP is a standalone document but should be read in conjunction with this EMS.

The site operates a strict no smoking policy and smoking is only permitted at designated locations which are clearly marked for the activity. The use of E cigarettes is also prohibited within the operational areas of the site.

Flammable and explosive materials such as oils, lubricants and gases will be stored separately from combustible substances and wastes. Any welding or cutting will take place in an isolated area which is free of combustible materials

Contact Details

The site manager and TCM shall provide contact details to the relevant regulating authorities should out of hours' contact become necessary. Contact details of the site manager and TCM shall be kept available in the site office.

Service	Name	Contact	Contact
Office landline	Chatham Freight	01634893092	Ditto
Managing Director	Jimmy	07939 999991	Ditto
Site Administrator	Tania Dogaru	07597 250099	Ditto
Local EA	Nick Ennis	0208 47 47 441	
National EA	Emergency Contact	0800 80 70 60	Ditto

Local Police	Kant Police	01622 690690	999
Fire Brigade		01622692121	999
Local Authority	Medway Council	01634 333 333	Ditto
Medway Hospital	Medway Maritime	01634 830000	Ditto

Litter

The site does not accept designated paper or cardboard waste, but from time to may find de minimis amounts in incoming waste streams. In this event, paper and cardboard will be placed in a suitably sized bin and transferred to an appropriate recycling facility for onward treatment.

All vehicles entering the site must be sheeted as a minimum, although history would suggest most waste is brought to site in sealed containers.

House Keeping

The site will be kept tidy and of a visually acceptable appearance. Site equipment whether in use or not will be stored in an organised manner sympathetic to the sites operation and access requirements. Debris within the site boundary including litter, mud and other waste materials will be cleaned on a regular basis either by mechanical sweeper, other mechanical equipment or by hand. Weeds will be removed at regular intervals and signage cleaned as required to ensure clear visibility.

Housekeeping requirements will extend to within the building by daily inspection by the site supervisor and director. Plant and equipment shall be maintained fit for purpose and cleaned daily to prevent building up of debris.

Waste storage bays shall be maintained as per the requirements of the fire prevention plan which includes as minimum:

- Waste stored in bays shall cease 0.5m below the top of the bay wall
- Waste shall not protrude out of the open aspect of the bay
- Concrete plinths used for the storage of waste shall be maintained fit for purpose and replaced if damaged
- A clear space shall be maintained at the front of each bay to prevent waste articulation between bays

Pests

General non-hazardous waste may attract rodents therefore bait boxes will be deployed throughout the site. These boxes will be checked on a 4-weekly basis and the bait topped up if required. Baiting shall only be conducted by a regulated contractor evincing the correct disciplines for the nature of their work.

Any waste streams that are likely to attract flies will be treated and or removed from site as a priority.

The director and supervisor shall maintain a watchful eye for the presence of flies and should quantities exceed what is commonly expected during warm weather conditions action shall be taken to eradicate the numbers before becoming an infestation.

Records

All records contained within the Appendix of this management system shall be completed in a legible manner within 1 working day of the occurrence.

All records will be retained for a minimum period of 2 years and be made available to the Environment Agency on their written request.

All of the recording systems contained within the appendix of this EMS will be filed in separate clearly marked folders which will be stored and maintained within the site office. It will be the responsibility of the site TCM to ensure that all records are completed as per the procedures contained within this EMS.

Reporting

All reports and notifications required by this EMS and permit will be submitted to the Environment Agency at the contact address supplied by the inspecting officer.

Within 1 month of the end of any quarter, commencing 1st April each year, the company will submit a return to the Environment Agency detailing all materials received and disposed of from the site. The information will be submitted electronically using a form downloaded from the Environment Agency website. Once submitted a hard copy will be retained in a separate clearly marked file which will be kept in the site office.

Notifications

The following incidents require the immediate notification to the Environment Agency:

- Any breakdown, malfunction or equipment failure that has resulted in an emission which has caused or may cause significant pollution.
- Any breach of a limit specified within this EMS. Any significant adverse environmental effect
- Fire

Notifications should be made by telephone on 03708 506 506

Any reported incident should be confirmed in writing to the Environment Agency within 24 hours of the incident.

If requested to do so in writing, by the Environment Agency, the Company will conduct monitoring or sampling relating to elements detailed within the site Permit or this EMS.

The Company will give the Environment Agency a minimum of 14 days' notice of the date that the monitoring or sampling is to take place. The TCM will make the notification and retain a copy.

The operator will notify the Environment Agency in writing of any of the following changes:

- Change in trading name or registered name
- Change in registered office

- Intention to go into administration, voluntary arrangement or being wound up

Technical Competence

The appointed Technically Competent Manager (TCM) will be qualified to manage a Medium Risk waste treatment and transfer facility and will maintain continued professional competence as required by the Waste Management Training & Advisory Board (WAMITAB).

The TCM will sign and date the visitor's book upon arrival to site and sign out on departure.

The TCM's qualification certificate will be on open display within the site office

The site will be operated with the following personnel:

Company Director
Resident Site Supervisor
Technically Competent Manager (TCM)
Weighbridge Operator
Machine operatives x 2
Agency workers (as required)

Local Environment

Natural England have designated the area of estuary adjacent to the dock yard as intertidal mudflats which are submerged at high tide and exposed at low tide and feature on the Priority Habitat Inventory for mudflats. The area is also designated as a priority area for Country Stewardship measures addressing Lapwing habitat issues and seabird nesting sites.

Emission Controls

In order to protect the local environment and habitats a H1 risk assessment has been completed that identifies the potential risk emanating from the facility and waste operations. In addition, this document seeks to augment the H1 risk assessment by accumulation of the following factors:

- ### Dust

  As the entire area is paved with concrete and tarmac there is little potential for dust emissions generated by waste delivery vehicles or site operations. The former is restricted by the dockyard speed limit which is frequently enforced by use of mobile speed cameras and dockside personnel. The dock authority employs a mechanical road sweeper to maintain the thoroughfares in good order free from debris and litter.

  Site operations are conducted within the main processing hall which is completely covered save for ingress and egress points. Dismantling of mattresses does create airborne dust and fibres which are encouraged to extraction fans at the north end of the building after passing through filters.

  Loading out of baled textiles is unlikely to create fugitive dust emissions as this activity is undertaken close to the exit located to the east of the building, and again, on impermeable concrete base which is kept damp in hot dry weather.

Due to the type of wheels fitted to site vehicles, waste handling trucks have solid rubber tyres fitted, there is a tendancy for the fabric of the tyres to wear leaving residue on the impermeable surface. The operator will therefore instigate a regular cleaning regime of the impermeable surface either manually or in large open areas, mechanically, to avert the build up of surface debris.

- ## Noise

Dismantling of mattresses and the general processes undertaken at the site to render the aforementioned into individual components is solely carried out within the main processing hall.

The machinery used in the receipt, storage and treatment of waste are all fitted with rubber tyres and standard industry exhaust moderators. Static plant such as balers are also within the building and create little noise during waste processing.

Any noise generated by machinery and movement of vehicles is deadened by virtue of the type of waste stored and treated on site. Stockpiled mattresses, textiles and carpets have a quality that absorbs noise to the extent of soundproofing the building.

Mechanical shredding of mattresses is the most likely activity to generate noise and therefore this will only be undertaken within the building for the following reasons:

- Prevent and contain dust emissions
- Benefit from the surrounding stored waste to absorb sound
  Ease of introducing water to the shredding process that effects to lubricate the materials

As mentioned elsewhere in this document, the site operates a fire tender that is available on standby when shredding of mattresses takes place and it is recommended that shredding activities are only carried out when this is in effect.

- ## Plant Failure

Chatham Freight employs a number of waste handling machines of varying types designed for different aspects of the treatment process. 360-degree excavators are used extensively for loading static plant and baled textiles into storage. Three excavators are in use at the site, one with extended reach with the capabilities for loading articulated vehicles and stacking bales. Two smaller excavators which feed the baler and shredding equipment but used primarily for disassembling mattresses as this process is no longer carried out manually.

Small grab trucks are used for transporting baled textile round the site and for loading containers ready for export. The site operates 2 such grabs for this activity.

Day-to-day maintenance is carried out by site staff, but should repairs or breakdowns occur, arrangements are in place with suitably disciplined companies located within the dockyard to provide immediate assistance

In the extremely unlikely event that more than two items of plant break down simultaneously and normal operations could not continue, the site would close to further waste deliveries until such time as normal working conditions resumed. It is noted that all large items of plant are supplied on R&M contracts.

- ### Arson, Vandalism and Unauthorised Entry

Chatham Freight Station is located in the centre of Chatham Docks, Gillingham Kent, and operated by Peel Ports. Entry to the docks is through continuously manned security gates and access is restricted to business users only.

Security personnel patrol the docks throughout the day and night and have contact details for each business establishment. Outside of the main dock entrance the site is surrounded by the waters of the river Medway. Where the docks are joined to the mainland in the south, the curtilage is protected by security fencing and CCTV monitoring.

Kent Police data search for the Chatham Docks area shows no recorded evidence of criminal activity within the dock yard during the past year (2020 figures were reviewed).

In addition to the above inherent security measures the site is operated 24 hours a day and staff are on site during weekends to perform maintenance tasks.

Fire Management

There is a dedicated Fire Prevention Plan (FPP) produced for the site and approved by the Environment Agency which must be read in conjunction with this document. The FPP is a standalone document and shall take precedence in times of fire emergency.

Site Procedures

The site operates under set procedures pertinent to the operation being undertaken and relevant requirements of health and safety legislation. Copies of site procedures are given in the following appendices.

APPENDICES

Appendix 1…… Plant Maintenance Procedure

December 2020

APPENDIX 1

Plant Maintenance Procedure

Site Procedure 00/01

Plant Maintenance Schedule

This site procedure is intended for plant operators and general operatives who use mobile plant during their duties at Chatham Freight Limited. It is intended to provide a guide for the minimum frequency of maintenance required and should not be considered exhaustive or replace the manufacturers recommendations for the maintenance of specific plant.

Associated documents **-**
Operators check sheet
Manufacturers maintenance manual

The waste treatment facility at Chatham Freight Station Limited operates the following items of plant:

- Mobile 360-degree waste handling machinery
- Baler
- Waste handling clamp
- Shredder

It is the operator's responsibility to ensure that daily checks are carried out in accordance with the plant manual specific to the plant being used. The Site Manager or Director will ensure checks are undertaken as specified by the manufacturers instruction and company procedures. Records of weekly checks will be kept in the site office for review if required.

Pre-start-up check;

Before using the waste handling equipment for the day, the following pre-start checks must be undertaken before work commences in addition to the plant maintenance check sheet requirements.

- All fluid levels
- Fan belt
- Loose components
- Trapped debris
- Battery is free of waste build up and compartment is clean

Should you suspect a fault with the equipment report the matter to the site manager or director immediately before using the equipment.

You must be aware that waste handling equipment can get hot, especially during hot weather and the risk of fire is greater under these conditions. Allow equipment to cool during break times or during periods of inactivity.

Checks throughout the day;

During hot dusty conditions waste handling equipment will require regular checks for trapped debris and clogging of the ventilated areas of the engine compartment. These need only be visual and brief to determine whether the equipment requires cleaning.

REMEMBER; HYDRAULIC COMPONENTS SUCH AS RAMS WILL BECOME HOT UNDER OPERATING CONDITIONS.

Equipment should be checked at least every two hours when operated constantly and less if conditions are hotter or dustier than normal.

- Dust suppression sprinkler system should be in use if the above is prevalent.

Waste handling equipment should be stopped mid-morning and mid-afternoon if worked continuously and sensitive areas cleaned by compressed air to remove build-up of fine particles and debris. Radiators are particularly susceptible to clogging during dusty conditions.

Washing down of equipment should only be considered at the end of the working day or should concern over the safety of the equipment take precedence. *Reason being that wet components can attract fine particles and encourage clogging if not allowed to dry thoroughly before re-use.*

APPENDIX 2

Rejected Load Procedure

Site Procedure 00/02

Rejected Load Procedure

This site procedure is intended for use in support of Duty of Care requirements for waste acceptance and is designed to ensure that waste accepted at the site is compliant with the requirements of an environmental permit or any active waste exceptions that may be registered for the site.

***Associated documents* -**
Waste Acceptance Procedure
Rejected Load Form

1. If the site clerk finds that the waste on the vehicle at the waste reception area does not comply with the conditions of the permit, the waste will not be accepted. The driver will be issued with a Rejected Waste Form and asked to leave the site.

2. If during or after deposit, the operative observes the presence of a significant quantity of unacceptable waste he will alert the driver and, if possible, reload the unacceptable waste onto the delivery vehicle.

3. If the vehicle has left the working area, the operative will contact the waste reception office and inform the site clerk who will detain the delivery vehicle at the site office if possible.

4. The site clerk will inform the Site Manager or his nominee who will then inspect the load with the delivery driver and, where practicable, ensure that the unacceptable waste is returned to the waste producer

5. Where the delivery vehicle has already left site, the unacceptable waste will be isolated or moved to a temporary storage location if safe to do so. Unacceptable waste is not to be covered with other waste.

6. The waste carrier will then be offered the opportunity to remove the waste.

7. If the carrier is unable to collect the waste, it will be re-loaded into a suitably safe container on his behalf.

8. The waste will then be consigned to an alternative disposal facility that is authorised to receive such waste, using a registered (and reputable) waste carrier.

9. Wastes that have been deemed unacceptable will be removed from the site within 5 calendar days of receipt

10. Each load of waste dispatched from the site will be accompanied by a waste transfer note.

11. The Site Manager or his nominee will record the incident in the site diary and inform the waste producer and waste carrier with the issue of a Rejected Waste Form. Where unauthorised waste is received for a second time from the same waste producer a warning letter will be issued to the waste producer in addition to the Rejected Waste Form. Any further receipt of unauthorised waste will result in the issue of a letter prohibiting the waste producer's use of the site.

12. Copies of waste rejection forms and letters issued to customers will be stored securely and filed with other relevant contract documentation.

APPENDIX 3

Waste Acceptance Procedure

Site Procedure 00/03

Waste Acceptance Procedure

This site procedure is intended for use in support of Duty of Care requirements for waste acceptance and is designed to ensure that waste accepted at the site is compliant with the requirements of an environmental permit or any active waste exceptions that may be registered for the site.

***Associated documents* -**
Rejected Load Procedure
Rejected Load Form

1. Waste acceptance criteria and procedures must be in place to ensure that all wastes accepted are suitable waste types under the permit or other prevalent protocols, are non-hazardous and that their acceptance will not intentionally cause a breach of permit conditions.

2. All waste deliveries must be accompanied by a completed waste transfer note providing the following details:

    a. Name and Address of waste producer

    b. Carriers registration number

    c. Waste carriers name and address

    d. Waste Description

    e. EWC Code

    f. Date

    g. Name and Address of intended disposal point

3. Waste deliveries must be pre-booked into site following confirmation of account status with the company commercial manager.

4. The drivers of all vehicles delivering waste to the site must report to the site office to disclose the nature of the waste they are carrying and provide the relevant documentation.

5. The site office is manned by a clerk who will record the movement of vehicles to and from the site and identify the loads they are carrying. The clerk will complete transfer notes and is responsible for their safe storage. The site clerk will sign the waste transfer note to confirm the details are correct. The transfer note will be signed after inspection of the waste on return of the vehicle to the office after the deposit of the waste has taken place. Transfer notes will be made available for inspection by representatives of the Environment Agency on request.

6. The site clerk will ensure that a fully completed Waste Transfer Note is received for every load (unless part of a multiple consignment) and includes the appropriate EWC Code.

7. The waste carrier will then be offered the opportunity to remove the waste. If the carrier is unable to collect the waste, it will be re-loaded into a suitably safe container on his behalf.

8. Only authorised carriers will be allowed on site. Any new waste carrier must provide evidence of registration (registration certificate or official copy certificate) before being allowed to deposit the load. In addition, occasional checks of waste carriers who regularly use the site will be carried out to check that their registration is still current.

9. Where possible, all loads of waste delivered to site will be visually inspected at the waste reception area (where practicable) and again when the waste is deposited at the discharge point of the main processing hall. The objective of this inspection is to try and detect the presence of unauthorised waste. It is acknowledged that the vast majority of waste deliveries arrive in enclosed containers and therefore visual inspection at the waste reception area is not possible.

10. CCTV surveillance of the main processing area and waste discharge point provides secondary inspection of incoming waste loads and may serve to detect unauthorised waste that is not visible from the ground.

11. Loads that appear acceptable after inspection at the waste reception area will be directed to the discharge point in the main processing hall. If the site clerk's inspection detects any unauthorised waste it will be dealt with in accordance with the waste rejection procedures.

12. After inspection of the load the site clerk will sign the waste transfer note to confirm that the details are correct. If inspection is not possible in the waste reception area, the clerk will only sign the waste transfer note when the vehicle returns to the waste reception area after the deposit of the waste has taken place.

13. The operative will observe every load as the waste is deposited from the delivery vehicle.

14. If the operative's inspection detects any unacceptable waste it will be dealt with in accordance with the Waste Rejection Procedures.

APPENDIX 4
Permit to Work

Site Procedure 00/04

Permit to Work

This site procedure is intended for use in support of the Fire Prevention Plan and must be reviewed prior to any works commencing and used in conjunction with a "Permit to work" form

***Associated documents* -**

Hot Works Permit

Site Rules

Site Induction

1. Any contractor that is conducting any task within any part of the facility must be issued with authorisation to conduct that task. This authorisation can only be given using the permit to work form.
2. The permit to work authorisation will be issued by a manager or his nominee who has received appropriate training.
3. On arrival at the facility all contractors will report to the weighbridge office
4. The office will record their arrival in the visitor's book and direct them to the site manager who will issue the permit to work authorisation.
5. Each section of the permit to work form will be completed and assurance will be sort from the contractor that they understand fully the instruction and detail given in each section.
6. On completion of the work or at the end of each working day the manager or his nominee will sign-off the form.
7. For the tasks that continue in to another day a new permit to work will be issued at the start of every day
8. Only persons involved in the specific task and covered by the permit can enter the work area
9. All persons associated to the work must be made aware of the hazards involved and measures to be taken
10. The hazardous area is clearly defined
11. Appropriate PPE is provided and worn at all times in the work area

APPENDIX 5

Emergency Procedures

Site Procedure 00/05

Emergency Fire Procedure

This procedure sets out the requirements for site management and operational staff in the event of a Fire at Chatham Freight Limited.

1. On discovering a fire immediately raise the alarm by operating the nearest fire alarm bell or air horn, shout fire! Only tackle a fire if you are confident to do so and where the risk is negligible. Site management must be notified immediately when a fire is discovered.

2. Evacuate all non-essential personnel to the assembly point located outside the main building.

3. Fire extinguishers and hoses are located at various points around the site (see fire point location plan)

4. The site fire tender must be kept on standby at all times when a fire is discovered.

5. The fire hoses are to be kept primed and ready for use in the event of a fire.

6. If the fire is not manageable then the fire services must be called by dialling 999 and the following activities actioned:

- Where appropriate check toilets and offices to ensure people are aware of the fire
- Leave the building by the nearest exit
- Do not stop or return to collect belongings
- Ensure visitors are escorted from the premises to the assembly point
- Return to the facility only when it is safe and authorised to do so by the emergency services.

Standard Operating Procedures

Fire tender

- The fire tender must be checked daily and a record made of such checks (site Diary)
- The tender must be kept full of water in readiness for use
- The tender must be started and run for a short period to ensure operational availability when required
- A list of staff trained in the use of the fire tender is to be maintained on site

Pressurized Hoses System

- The static water tank is to be kept full at all times in readiness for an emergency
- The system is pressurized by means of an electric pump which is activated automatically when water flow is sensed
- Hoses are located at strategic points along the eastern side of the building and designed to reach the opposite wall if required

7. Site plant have the appropriate fire extinguishers accessibly located on the machine

8. This waste facility operates under the management of a "Fire Prevention Plan" of which a copy is kept in the site office and should be made available to the emergency services upon request.
9. Any discharge of a fire extinguisher, however this may occur must be reported to the site manager immediately after use and arrangements made for replacement.

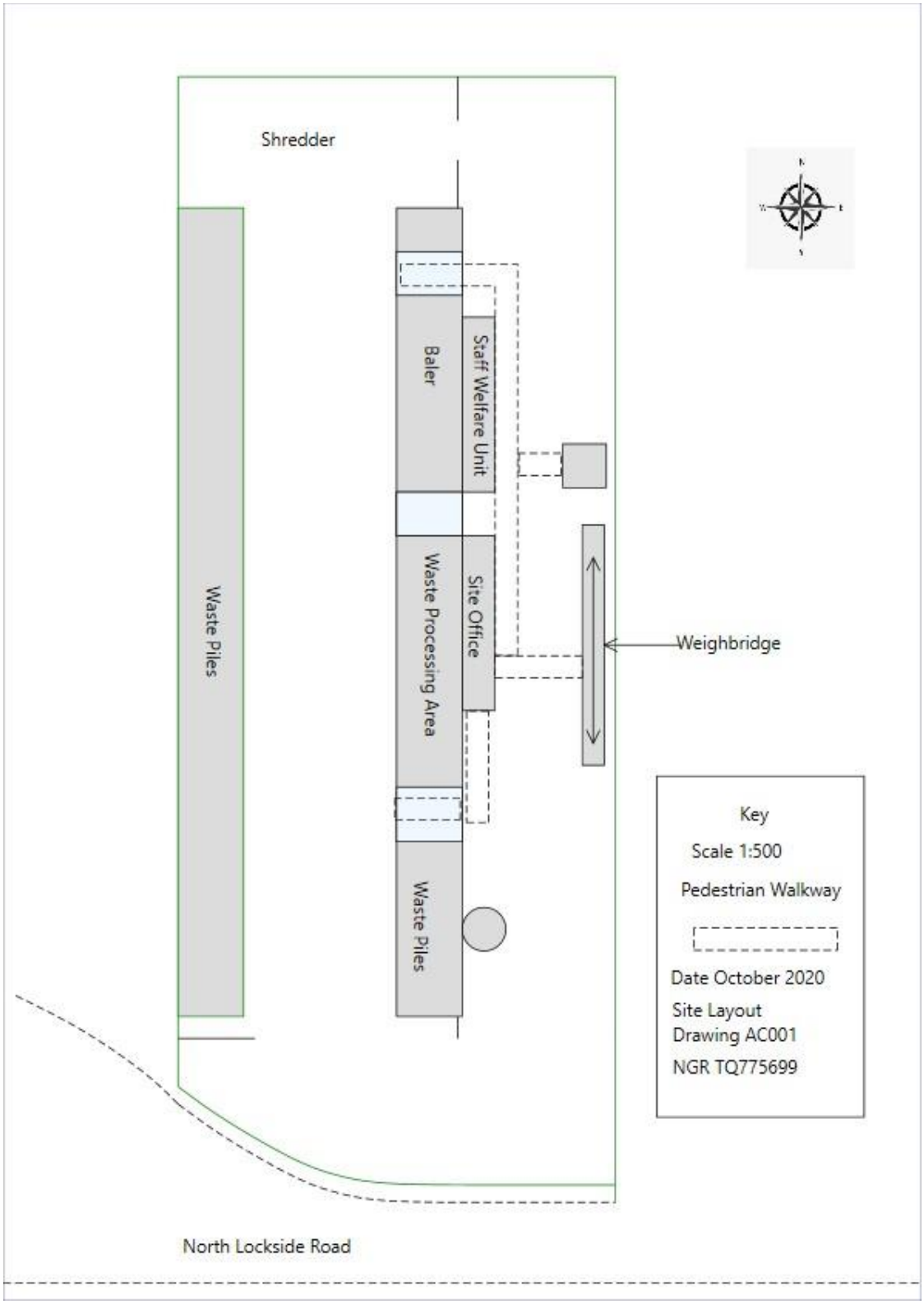
10. Fire extinguishers will be maintained in accordance British Standards

Post Emergency Activities

- Procedures relating to a fire emergency, during and after the event, are detailed in the Fire Prevention Plan.
- The company Health and Safety representative should be informed of the event of a fire and subsequently investigate the circumstances surrounding the incident and conduct a full review of operating and emergency procedures with recommendations for betterment if required.

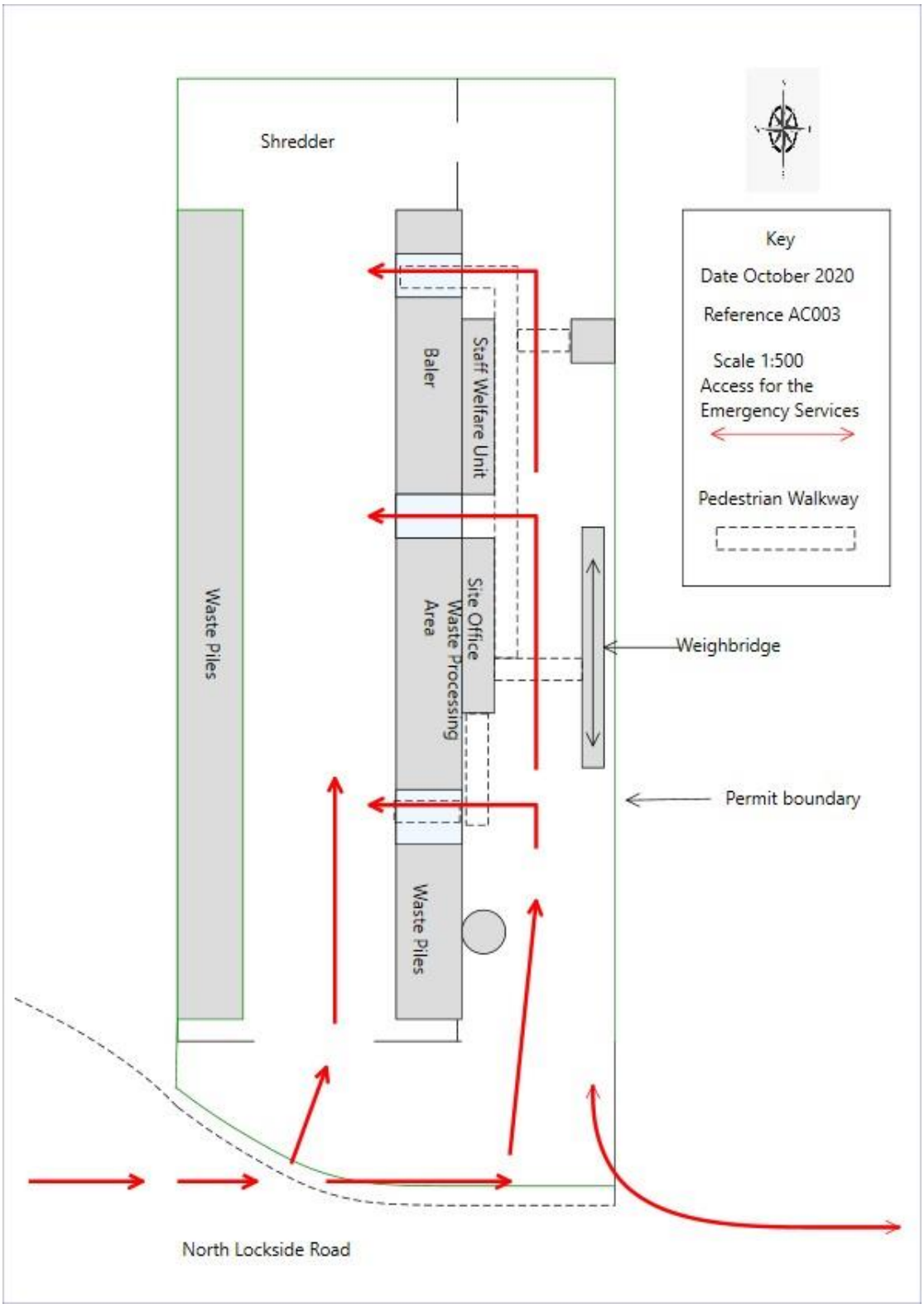
APPENDIX 6

Site Layout Plan



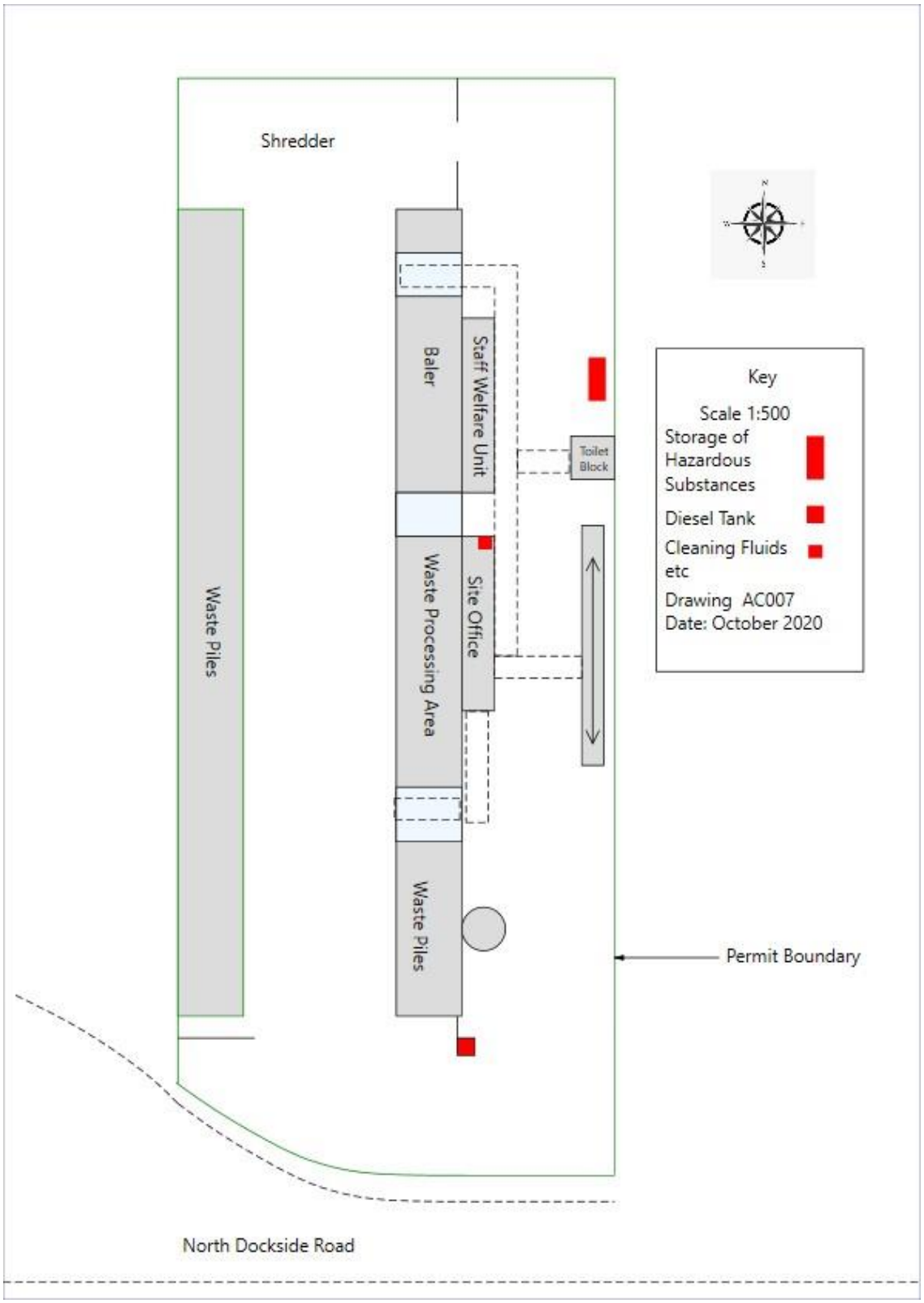
APPENDIX 7

Access for Emergency Services



APPENDIX 8

Location of Hazardous Substances



APPENDIX 9

Control of Substances Hazardous to Health (C.O.SH.H.)

1. Using chemicals or other hazardous substances at work put people's health at risk, so the law requires employees to control exposure to hazardous substances to prevent ill health and harm. They must protect both employees and others who may be exposed by complying with the Control of Substances Hazardous to Health Regulations 2002 (COSHH) (as amended)

2. Hazardous Substances

3. Hazardous substances include but not limited to:

- Substances used directly in work activities (e.g. adhesives, paints, cleaning products and solvents)
- Substances generated during work activities (e.g.) fumes from soldering and welding)
- Naturally occurring substances (e.g. grain dust)
- Biological agents such as bacteria and other micro-organisms
- Fuels and lubes used in refuelling of plant and machinery

4. What COSHH requires (to comply with COSHH the following steps will be taken)

Step 1 Assess the risk

Step 2 Decide what precautions are required

Step 3 Prevent or adequately control exposure

Step 4 Ensure that control measures are used and maintained

Step 5 Monitor the exposure

Step 6 Carry out appropriate health surveillance

Step 7 Prepare plans and procedures to deal with incidents, accidents and emergencies

Step 8 Ensure employees are properly informed, trained and supervised

5. Employees at Chatham Freight Station Limited do not work with or exposed to large quantities of hazardous substances. However, all products must be assessed and if found to be hazardous must be categorised and those potentially exposed to the substance trained and issued with appropriate PPE.

6. In the first instance, a data sheet must be obtained from the material supplier, this will then be assessed for compliance with the intended use.

7. Those potentially exposed to any substance will be trained by those appointed to do so by the company. A record of training will be kept on file.

8. All COSHH data and risk assessment sheets will be kept in a clearly marked file in the site office.

9. Regular Tool Box Talks will be undertaken to reinforce personal diligence of staff when dealing with potentially harmful substances.

APPENDIX 10

Permit Boundary

APPENDIX 11

Environmental Risk Assessments

ODOUR

Hazard	Receptor	Pathway	Risk Management	Probability of exposure	Consequence	Residual Risk
Odour from waste	Neighbouring industries <50m away	Air	Malodorous waste rejected from site before deposit or removed from site as a priority	Minimal due to containment features of the building	Potential annoyance which will have more impact in elevated temperatures and may result in complaints from neighbours	Not significant as the type of waste accepted at the site is seldom odorous.

Noise and Vibration

Hazard	Receptor	Pathway	Risk Management	Probability of Exposure	Consequence	Residual Risk
Engine noise from plant and vehicle movement	Neighbouring industries	Air	Speed limit in force for waste delivery vehicles. Stored waste has the properties to suppress sound effectively soundproofing the building	Not probable	None	No residual risk
Noise of static plant	Neighbouring industries	Air	Building soundproofed by storage of mattresses and textiles	Not probable	None	No residual risk
Noise from reversing bleepers	Neighbouring industries	Air	Most vehicles employ white noise warning bleepers and reversing only into the building	Unlikely due to the surrounding noise from other industries.	Reversing bleepers are a safety feature and must not be removed	Minimal due to the infrequency of use of bleepers and

			and from the weighbridge			surrounding activities
Vibration from plant and vehicle movements	Neighbouring industries	Ground	Only small machines are in use and all are fitted with rubber tyres	Minimal	None	No residual risk

Fugitive Emissions

Hazard	Receptor	Pathway	Risk Management	Probability of Exposure	Consequences	Residual Risk
Dust from waste processing operations	Neighbouring industries	Air	Site conditions checked daily, and water suppression used if required. Waste processing takes place in the main building which contains potential dust emissions	Low to none. All areas are paved and kept clean and free of debris. Waste mattresses are not inherently dusty.	Potential complaints from neighbouring premises but unlikely as dust management techniques are sufficient.	Very small due to the features of the building, types of waste treated and paved ground conditions
Debris from mattress processing	Chatham Docks and neighbouring industries	Air and vehicles wheels	Good housekeeping is essential and recovery of any fugitive debris outside of the building is carried out at regular interval	Minimal as waste from mattresses is unlikely to adhere to vehicles and checks are made before leaving the facility	Complaints from port authorities	Minimal
Vermin attracted to site due to warmth of waste stored on site	Immediate area and neighbours	Ground	Pest control in use on site - bait boxes. Rotation of waste piles will disturb vermin	Not probable as waste is stored in the building and continuous rotation of waste piles ensues.	Complaints from neighbouring business	Minimal if control is implemented as required by site procedures.

Fire Risk

Hazard	Receptor	Pathway	Risk Management	Probability of Exposure	Consequences	Residual Risk
Water runoff during a fire	Chatham Docks	Overland and permeate through ground surface	Building has concrete plinth supporting the main structure and is located in a depression that affords water storage	Medium due to the proximity to the docks	Pollution of controlled waters	minimal
Water runoff during a fire	Groundwater	Seep through ground surface	The integrity of the sealed surface within and surrounding the site must be maintained by inspection and immediate action if required	Medium if sealed surface is not maintained correctly	Potential pollution of groundwater	Minimal due to maintenance programme and inspection procedures in place
Smoke from fire	Neighbouring amenities	Air	Early containment is essential combined with enactment of emergency action plan	High to neighbouring amenities but smoke tends to rise rapidly. Prevailing wind direction is towards open waters of the river estuary.	Smoke inhalation, air pollution.	Medium following adherence to emergency action plan
Fire in waste piles	Chatham docks and neighbouring industries	Air and conductivity via adjoining land	Ensure segregation is maintained and pathways are eliminated. No smoking rule enforced at all times. Plant is maintained as required.	Possible if adherence to FPP is not maintained.	Fire taking hold of entire building and spreading to neighbouring premises	Minimal if adherence to FPP and EMS is maintained

Incidents

Hazard	Receptor	Pathway	Risk Management	Probability of Exposure	Consequences	Residual Risk
Oil spillage	Ground and controlled waters	Over ground and potential seepage through surface	Regular inspection of fuel filling equipment. Staff trained to react and use appropriate spill kits.	Minimal	Pollution of groundwater	Minimal due to impermeable concrete base
			Ensure concrete surface remains intact. Oil drums to be seated on spill trays.	Not very probable. Manager and TCM to ensure adherence to procedures	Pollution of controlled waters	Minimal due to management procedures in place.

Arson

Hazard	Receptor	Pathway	Risk Management	Probability of Exposure	Consequences	Residual Risk
Fire in waste processing hall	Other waste piles and neighbouring premises	Air and conductivity	Site is manned 24 hours. Constant security patrols day and night. Security gates and fences with CCTV coverage	Unlikely due to location and security measures in place	minimal	Negligible
Damage to site plant releasing fuels and lubes	Ground and surface water	Over and through the ground	As above	Unlikely	Minimal	Negligible