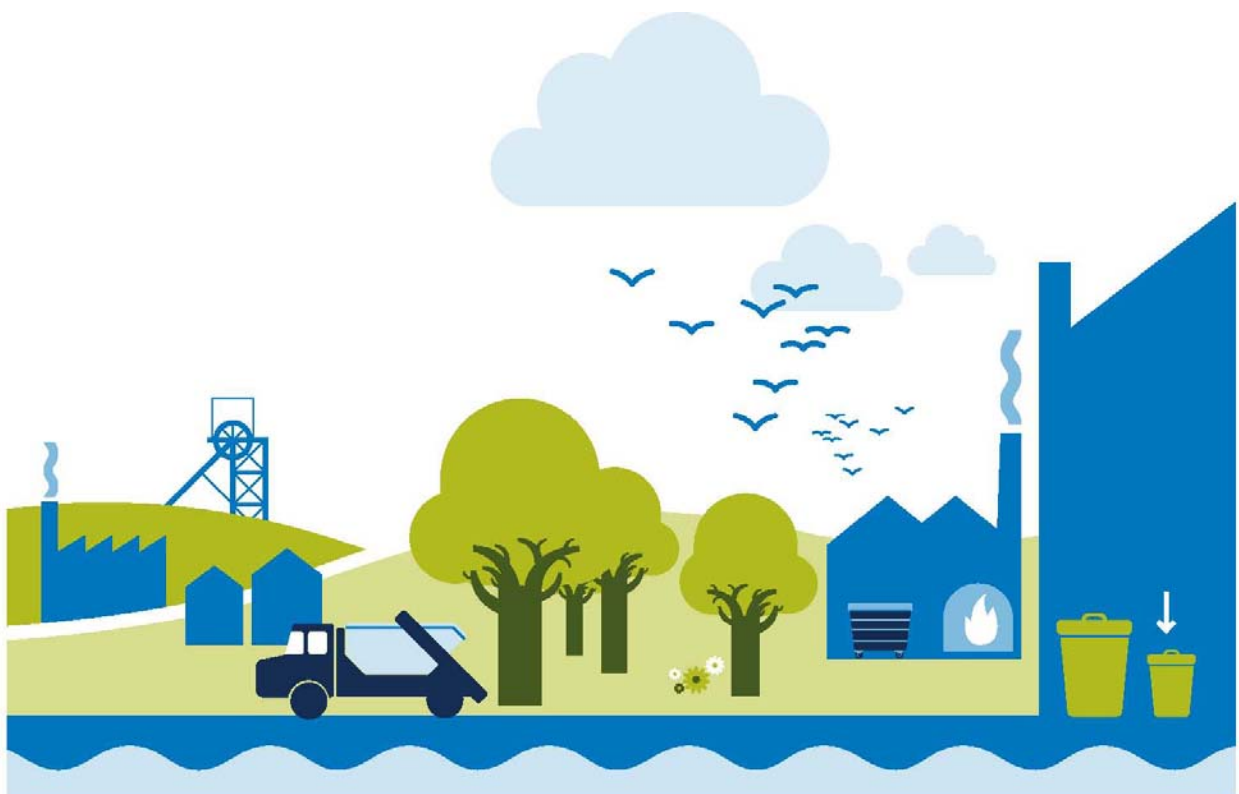


How to comply with your environmental permit  
Additional guidance for:

# Horizontal Guidance Note H6 - Environmental Management Systems



We are the Environment Agency. It's our job to look after your environment and make it **a better place** – for you, and for future generations.

Your environment is the air you breathe, the water you drink and the ground you walk on. Working with business, Government and society as a whole, we are making your environment cleaner and healthier.

The Environment Agency. Out there, making your environment a better place.

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# Contents

<b>Introduction</b> .....	<b>2</b>
<b>1. Managing your activities</b> .....	<b>4</b>
1.1 What is an EMS .....	4
1.2 Which part of my permit makes it a requirement to have an EMS in place? .....	4
1.3 What will an effective EMS achieve? .....	6
1.4 Types of external EMS .....	7
1.4.1 ISO14001 .....	8
1.4.2 EMAS .....	10
1.4.3 BS 8555 .....	11
1.4.4 Green Dragon Environmental Standard .....	12
<b>2 Operations</b> .....	<b>14</b>
2.1 What should be included in an EMS for larger higher risk operations? .....	14
2.2 What should be included in an 'in house' EMS for smaller lower risk operations? .....	15
2.2.1 Identifying and minimising risks of pollution .....	15
2.2.2 Operations and maintenance .....	16
2.2.3 Accidents .....	17
2.2.4 Incidents and non-conformances .....	19
2.2.5 Closure .....	19
2.2.6 Complaints .....	20
2.2.7 Staff training and competence .....	20
2.2.8 Odour, noise and emissions management plans .....	21
2.2.9 Documentation of legislation and other requirements .....	22
<b>4 Annex</b> .....	<b>25</b>
4.1 Appendices .....	25
4.2 Other sources of information .....	25

# Introduction

## Introduction

### About this guidance

This guidance is part of a suite of technical guidance notes designed to help you, if you hold or are thinking of applying for an [Environmental Permit](#). The guidance will help you understand how to comply with the requirement for an operator who holds an environmental permit to have an EMS.

The introduction to this suite is [How to Comply with your Environmental Permit](#) which covers a large proportion of what an operator needs to know. There is a separate [How to Comply with Your Environmental Permit for intensive pig and poultry activities](#) and two others for radioactive substances regulation. These give more information on how to comply with the requirement for an EMS for those particular regimes. You should read the introduction relevant to you before you read the additional notes.

There are additional notes that cover issues specific to a particular business

sector, and what the Environment Agency call “horizontal” guidance notes that go into more detail on a particular topic, for example risk assessment, noise or odour. [Click here to see a list of the available sector and “horizontal” notes](#). H6 is one of these “horizontal” guidance notes. All of these are available from our website.

This guidance does not apply to radioactive substances regulation (RSR). Follow links for guidance documents on the management arrangements for [RSR nuclear operators](#) and for [RSR non-nuclear operators](#).

If you are making a new application for a permit under the Environmental Permitting Regulations you should start with the Environmental Permitting application form which will lead you through the necessary steps. Click [here](#) for the application form and guidance.

# 1

## Managing your activities

**1.1 What is an EMS**

**1.2 Which part of my permit makes it a requirement to have an EMS in place?**

**1.3 What will an effective EMS achieve?**

**1.4 Types of external EMS**

# What is an EMS

## 1. Managing your activities

### 1.1 What is an EMS

An EMS is a structured system which, once implemented, helps an organisation to identify the environmental impacts resulting from its business activities. It also helps manage and reduce those impacts, so that the environmental performance of the organisation is improved. An EMS should provide a methodical approach to planning, implementing and reviewing an organisation's environmental management.

The role of an organisation's EMS is to identify and control the risks that the organisation's activities pose to the environment and human health.

An EMS can help you save money by:

- identifying where efficiency savings can be made;
- ensuring compliance with environmental legislation;
- identifying and managing significant environmental impacts;
- providing benchmarks for improvement;
- helping to manage resources.

It can also provide a way for you to plan for and demonstrate that steps have been taken to reduce or prevent environmental harm occurring as a result of your operations.

### 1.2 Which part of my permit makes it a requirement to have an EMS in place?

If you hold a permit under the Environmental Permitting Regulations 2010 you are required to have an appropriate EMS in place. It must set out in detail, how all the activities that happen on your site will be managed in accordance with the permit.

In newer permits the permit condition or rule requiring an operator to have an EMS in place is typically condition 1.1.1. It says:

**The operator shall manage and operate the activities:**

1. in accordance with a written management system that identifies



# Which part of my permit makes it a requirement to have an EMS in place?

and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances [closure]<sup>1</sup> and those drawn to the attention of the operator as a result of complaints; and

2. using sufficient competent persons and resources.”

Additionally there is a typical permit condition or rule 1.1.2 on the permit that requires;

**Records demonstrating compliance with rule 1.1.1 shall be maintained.**

Typically permit condition or rule 1.1.3 on the permit;

**Any person having duties that are or may be affected by the matters set out in this permit shall have convenient access to a copy of it kept at or near the place where those duties are carried out.**

These conditions mean that as an operator you must put in place management arrangements to ensure that you comply with the permit condition and protect the environment from harm which could be caused by your activities. The Environmental Permitting Regulations 2010 cover a wide range of activities both

in terms of scale and risk. The type of EMS implemented must be proportionate to both the scale and the risk that the activities, covered by the permit, pose to the environment. This is discussed more in [section 1.4](#).

In order to comply with these permit conditions, an operator must ensure that an EMS is in place, that it's adequate for the activities taking place and that it's being implemented.

The condition requiring an operator to have an EMS in place specifies that it has to be written down. In order to easily demonstrate compliance with this condition your EMS can be written down either electronically or in paper form, however it must be freely available to all employees, management, any contractors working on site as well as the regulating officer.

---

<sup>1</sup> This does not apply to mobile plant, stand-alone water discharge activities or stand-alone groundwater activities.

# What will an effective EMS achieve?

## 1.3 What will an effective EMS achieve?

An effective EMS will:

- Minimise or prevent the risk of pollution to the environment by the activities which are being undertaken.
- Be implemented at a strategic level and integrated into corporate plans and policies so that all staff know their environmental responsibilities.
- Assess the organisation's environmental impacts and identify opportunities to reduce pollution to air, land and water.
- Reduce waste.
- Set out clear objectives and targets to minimise the significant environmental impacts.
- Record environmental performance against targets and industry performance indicators to encourage continual improvement.
- Ensure compliance with environmental legislation and take action to prevent and correct cases of non-compliance.
- Deliver good resource management and encourage sustainable development and financial benefits.
- Identify key interested parties and communicate company environmental performance to them clearly.

An effective EMS should prove to be cost neutral and will often lead to sustained savings via environmental efficiencies in reduced waste production and energy use. If an accident or incident of non-compliance happens on the site an audit of the management system should provide the operator with a means of detecting the root cause of the problem.



# Types of external EMS

## 1.4 Types of external EMS

A number of external bodies provide certification/verification schemes through which an organisation's EMS will be assessed for conformity to the requirements of that bodies' particular standard.

These standards are:

- ISO14001 (International Organisation for Standardisation) - Worldwide Standard.
- EMAS (Eco Management and Audit Scheme) - originally a European Standard now extended to organisations outside Europe.
- BS8555 (British Standards) through the Acorn Scheme.
- Green Dragon Environmental Standard - Available in Wales and England.

The Environment Agency strongly supports registration to one of these bodies followed by certification/verification of your EMS by that body. This is especially important for the following activities:

- waste facilities
- installations
- mining waste operations
- waste mobile plant
- large water discharge activity (discharging over 20m<sup>3</sup>/day)

- groundwater discharge activities (discharging over 20m<sup>3</sup>/day).

A less formal in house system may be sufficient for smaller organisations undertaking the following activities:

- small low risk waste operation;
- water discharge activity of less than 20m<sup>3</sup> /day;
- a low risk groundwater discharge activity of up to 20m<sup>3</sup>/day.

If an organisation doesn't have the resources to pursue formal certification/verification to the standards listed above then they could develop their own in-house EMS. However, whilst an in house EMS may be as effective as any other, it's harder to assess its effectiveness as it's not being assessed by an external organisation using a standard auditing approach.

The schemes described below are suitable for smaller organisation to use.

The European Commission has developed EMAS 'easy' which aims to help small and medium sized enterprises achieve registration for EMAS, details can be found at

# Types of external EMS

<http://ec.europa.eu/environment/emas/toolkit/>

Alternatively the phased approach provided by BS 8555 is particularly useful for smaller operations and can make EMS implementation much simpler. Information can be found under:

[IEMA Acorn](#)

[Green Dragon Environmental Standard](#)

It's important to remember that a permit requires an operator to attain certain environmental outcomes. These may extend beyond the scope of ISO 14001,

EMAS, Green Dragon or BS8555 registration.

Registration to one of the formal standards is valuable however it doesn't guarantee permit compliance. Check your permit carefully to ensure that all parts are included in your EMS, especially information about maintenance if applicable.

If the activities you will be carrying out have been identified as not needing registration to an external body you may wish to skip to [section 2.2](#).

## 1.4.1 ISO14001

ISO 14001 is an internationally recognised standard. ISO 14001 involves the following aspects.

### **Developing an environmental policy which will have to be made public.**

An environmental policy provides direction for management of the environment by providing a framework for setting and reviewing environmental objectives and targets.

The policy must make three commitments:

1. Compliance with all applicable legal requirements, and with other requirements to which the organisation

subscribes relating to its environmental aspects;

2. Prevention of pollution;
3. Continual improvement.

### **Environmental Aspects.**

An environmental aspect is an element of an organisation's activities, products or services that can interact with the environment. Environmental aspects must include those that currently interact with the environment, and those that have potential to interact with the environment, for example, accidents and incidents like fires.

# Types of external EMS

Organisations should include not only environmental aspects that they can control but also identify those which they can influence. For example, through the procurement of goods and services like motor vehicles and contractors.

## Objectives and targets

Objectives are the goals that the organisation sets for itself for achieving improved environmental performance. For example, an organisation's objective could be to reduce energy use.

Targets provide a way of checking how the organisation is improving as it works towards achieving the objective. One objective could have several targets. An example target to the above objective could be to reduce energy use by 10% by year 2012.

The setting of objectives and targets is based on the information obtained during the initial review and identification of significant environmental aspects. Targets should be:

- Specific – each target should address one issue only.
- Measurable – your targets should be expressed quantitatively, for example, 10% reduction/unit.
- Achievable – your targets must be something that you can achieve. For example a zero energy use target is unachievable for most organisations.
- Relevant – your targets should be challenging but not overly ambitious.

Remember they can always be revised once they have been met.

- Time restricted – your target must be assigned an end date for delivery.

## Environmental action plans

- Maintenance Plans.
- Accident and emergency plans and contacts.
- Staff competence training and awareness plans.
- A listing of staff roles, responsibilities and authority.
- Plans outlining the lines of communication for EMS related issues.
- Documents required by ISO 14001 and plans for the control of these documents.
- Operational controls – i.e. documented procedures to control processes and operations which do or could have significant environmental impact.

If required by an environmental permit any odour management plans, noise management plans and emissions management plans would be included here.

## Checking

Monitoring and measurement of an organisations' activities that can have an environmental impact. This allows the organisation to evaluate their compliance with any requirements placed upon them by relevant legislation, permits and any other schemes they have subscribed to.

# Types of external EMS

Any non-conformances discovered should be corrected and action should be taken to reduce or where possible eliminate the possibility of further non-conformances.

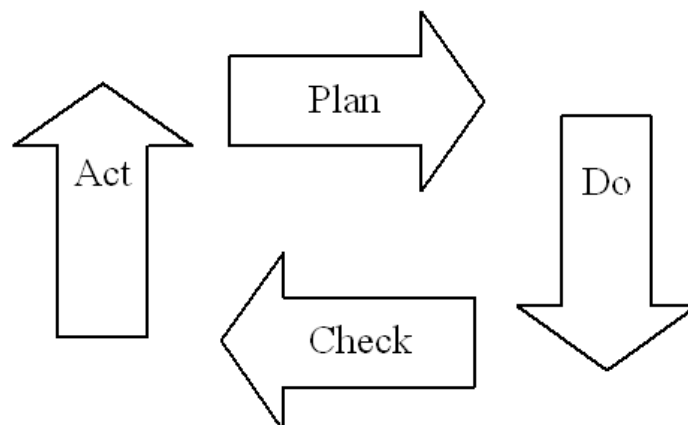
Checking also involves the results of any internal audits, carried out under the internal audit program, and any actions taken as a result.

## **Management review.**

Is an opportunity for top management to take a comprehensive look at the continuing suitability, adequacy and effectiveness of the environmental management system. A review should also approve actions to improve the system, to reduce exposure to environmental risk and to improve the environmental performance of the organisation.

## 1.4.2 EMAS

The EU Eco-Management and Audit Scheme (EMAS) is based around the Denning Cycle see diagram below.



**Plan** - This stage involves:

1. Carrying out an initial environmental review;
2. Developing an environmental policy;
3. Developing an environmental program.

**Do** - How to implement and structure an environmental management system including:

1. Assigning responsibility within the EMS;
2. Evaluating training needs and providing new skills and education;

# Types of external EMS

3. Communication with internal and external stakeholders;
4. Organisation of environmental documentation;
5. Control and maintenance of documents and worksheets;
6. Development of codes of conduct and precise instructions to support the EMS;
7. Accident and emergency plans.

**Check** - This stage involves controlling and monitoring environmental performance and management systems including:

1. Monitoring and measurements;
2. Reviewing continual improvements and corrective actions;
3. Records;
4. Internal audits.

**Act** - This stage involves:

1. Reviewing the environmental management system;
2. Communicating and reporting on the organisations environmental performance;
3. Getting official recognition through external verification.

## 1.4.3 BS 8555

BS 8555 is designed for small and medium sized companies to make it easier to achieve ISO14001 or EMAS through a phased approach. BS 8555 is useful for demonstrating a company's commitment to environmental improvement and working towards ISO14001 or EMAS.

What's involved?

The phased approach used by BS 8555, piloted through the Acorn Scheme, breaks down the process of developing an EMS into five levels. A sixth level allows organisations to develop systems which will meet requirements of the international standard, ISO14001. These levels are:

1. Commitment and establishing the baseline
2. Identifying and ensuring compliance with legal, and other requirements
3. Developing objectives, targets and programmes
4. Implementation and operation of the environmental management system
5. Checking auditing and reviewing
6. Gaining formal recognition of the environmental management system

After each phase of the scheme has been implemented, the organisation can either assess themselves through internal audits,

# Types of external EMS

allow major customers to assess them against the appropriate phase criteria or be assessed by a third party to ensure that the requirements of each phase have been met.

The phased approach of BS 8555 allows organisations who don't have the resources to gain European or international certification, or to implement a fully fledged EMS, but which have made progress in environmental management, to receive acknowledgement of their efforts.

An independent inspection scheme developed by the Institution of Environmental Management and Assessment (IEMA) offers accredited recognition for organisations evaluating and improving their environmental performance through the phased implementation approach. This is known as the [Acorn Inspections Scheme](#)

## 1.4.4 Green Dragon Environmental Standard

The Green Dragon Environmental Standard incorporates the following key principles of environmental management:

1. Continual environmental improvement;
2. Compliance with environmental legislation;
3. Pollution prevention;
4. Communication of environmental issues.

There are five levels in the Green Dragon Environmental Standard which organisations can work towards obtaining. These are:

1. Commitment to environmental management;
2. Understanding environmental responsibilities;
3. Managing environmental impacts;
4. Environmental management program;
5. Continual environmental improvement.

Organisations will receive different levels of recognition dependant on the level they obtain. The Green Dragon Environmental Standard can be used as a stepping stone towards obtaining EMAS or ISO14001.

# 2

## Operations

**2.1 What should be included in an EMS for larger higher risk operations?**

**2.2 What should be included in an 'in house' EMS for smaller lower risk operations?**



# What should be included in an EMS for larger higher risk operations?

## 2 Operations

### 2.1 What should be included in an EMS for larger higher risk operations?

The Environment Agency strongly recommends that larger, higher risk operations register their EMS with one of the external certification bodies. Whilst the actual content of the EMS may vary slightly due to the different requirements of the schemes there are several criteria which all EMS's should include.

1. An environmental policy
2. An analysis of the significant environmental effects of the activities carried out
3. How to comply with and go beyond legal and other requirements
4. Clear environmental objectives and targets
5. An environmental action plan.
6. Responsibilities for compliance should be clearly linked to a named member of staff
7. Plans for training, awareness and competence of staff
8. An effective communication strategy to both internal and external parties
9. Document management and control procedures
10. Operational control procedures
11. Emergency preparedness and response plans
12. Monitoring and measurement plans and records
13. Records of non-conformance and corrective and preventative action that will/has been taken as a result
14. Records management
15. Regular internal audits
16. Regular management reviews to ensure continual improvement
17. Methods to report environmental performance externally
18. Once all the above have been completed independent verification and validation of your environmental management system and environmental information.

As well as this operators should ensure that all aspects of the management condition 1.1.1 are met. See section 2.2 below.

# What should be included in an 'in house' EMS for smaller lower risk operations?

## 2.2 What should be included in an 'in house' EMS for smaller lower risk operations?

Typical permit condition or rule

(Typically condition 1.1.1 on the permit)

(b) using sufficient competent persons and resources.

The operator shall manage and operate the activities:

1.1.2 Records demonstrating compliance with rule 1.1.1 shall be maintained.

(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 [note this does not apply to mobile plant, stand-alone water discharge activities or stand-alone groundwater activities] and those drawn to the attention of the operator as a result of complaints; and

1.1.3 Any person having duties that are or may be affected by the matters set out in this permit shall have convenient access to a copy of it kept at or near the place where those duties are carried out.

### 2.2.1 Identifying and minimising risks of pollution

This means that operators are required to state how the activities carried out by their organisation can interact with the environment and cause pollution. Every possible source of pollution must be identified and controlled. Once these potential sources of pollution are identified plans need to be put in place to minimise the chance of the organisation's activities causing environmental pollution.

A site plan or map can be useful in helping to identify the activities carried out on the site. The map should include environmental considerations such as drainage (including both surface and foul drains), chemical and oil storage locations, location of waste skips, location of sample points for permits to discharge, wind direction, local neighbours, potential areas of contaminated land and so on.

# What should be included in an 'in house' EMS for smaller lower risk operations?

The site plan doesn't necessarily have to be a highly technical drawing but does need to represent all the main features of the site and be drawn to scale.

The route and final destination of the drains should also be identified on the plan.

Consider what is involved with each activity that takes place on the site and the pollution which may arise from it. Consider the pollution risks under normal operations as well as under abnormal operations, that is, when something goes wrong. Accidents can cause significant pollution over a short period of time and need to be minimised.

Consider at a minimum:

- Process operation
- Plant and machinery
- Waste disposal
- Solid waste management
- Emissions/discharges for example, noise and odour
- Water use/discharges
- Raw materials used
- Storage of materials on site
- Transportation and distribution

### 2.2.2 Operations and maintenance

Permit condition 2 sets out the operations which are permitted to be carried out at a particular site. The EMS should specify exactly what activities the permit allows to be carried out on site. This will ensure that

- Energy sources and usage
- Product design
- Packaging

Consider how any potential pollution from the above activities could impact on the following:

- Air
- Water
- Land
- Neighbours
- European sites, for example, SSSI's, SAC's, SPA's, RAMSAR sites
- Flora and fauna
- Archaeology and the built environment.

Once the above have been identified, plans must be put into place to minimise the chance of the identified activities causing pollution. Tables one to four [environmental impacts plans](#) and controls, found in the annexes, could help with the implementation of these plans. [Pollution Prevention Guidance](#) document 21 on pollution incident response planning could also help with developing plans.

staff know what they are and aren't allowed to do.

Written operating instructions should be provided to staff who are required to use

# What should be included in an 'in house' EMS for smaller lower risk operations?

any plant and equipment present onsite. The instructions should provide direction on how equipment is to be used to achieve the work objective and address any precautions which are to be taken as part of that work to ensure any risks to the environment posed by the use of the equipment are minimised or eliminated. These instructions should include details of what to do when things go wrong, that is, when the plant or equipment malfunction and how to stop a malfunction causing an adverse environmental impact.

At a minimum the Environment Agency would expect any maintenance advice provided by a manufacturer, supplier or installer to be followed. As many pollution incidents reported to the Environment Agency can be traced back to a maintenance failure it's very important that the EMS includes a plan for proactive and preventative not reactive maintenance of the plant and equipment used on the permitted site. If an organisation chooses to use an inspection or maintenance timescale which differs from that recommended by the manufacturer, supplier or installer the

reasoning behind this should be explained in writing in this section of the EMS.

Table 5 which can be found in Annex two is a simple maintenance checklist which, if used properly, could provide a plan for proactive maintenance.

A record that the maintenance checks were actually carried out when they were scheduled should also be kept. This could be done in a 5 year diary. Alternatively the maintenance checklist and maintenance record forms in tables 5 and 6, found in the annexes, could be used.

The following information relating to the maintenance checks should be entered into the diary (or chosen method of recording the information):

- The check or maintenance job done (for example, *Checked interceptor*)
- Who did it (for example, *Mr A Person*)
- The result (for example, *40cm of oil was emptied*)

### 2.2.3 Accidents

All permit holders are required to put in place an accident management plan which can be put into action as and when required. It should be clearly communicated to all employees, managers and contractors who work at the site.

An organisation's accident management plan should form part of their EMS. To produce an accident management plan the following steps should be taken:

# What should be included in an 'in house' EMS for smaller lower risk operations?

- identify risks from the activities carried out that could damage the environment;
- assess how likely they are to happen and the potential environmental consequences;
- take action to minimise the potential causes and consequences of accidents;
- identify how to minimise the consequences should such accidents occur.

If an accident does happen and it may cause an adverse environmental impact, permit holders will be expected to:

- immediately do what it says in the accident management plan;
- do whatever else is necessary to minimise the environmental consequences;
- take all precautions to ensure the health and safety of both employees and external people is not compromised;
- find out why the accident happened and take action to stop it happening again;
- review the accident management plan.

The accident management plan must be reviewed at least every 4 years, if management or named responsible people change or as soon as possible after an accident. Any updates or changes needed

must then be put into an updated accident management plan. If no changes are needed record the date of the review and the fact that no changes were needed.

An accident management plan should include:

- A site map, which will include all the information mentioned in [section 2.2.1](#) as well as information on where accident response equipment such as spill kits and fire extinguishers are located.
- A list of key contacts and contact numbers.
- Information on preventing accidents which could occur on the site and what to do if an accident happens.

Guidance can be found in [horizontal guidance document H1](#).

Table 7 found in the annexes, titled [accident/incident plan](#) contains examples of accidents which may occur on a generic site. Operators should delete accidents which are not relevant to their site and add in any extra ones which are identified whilst writing the accident management plan.

# What should be included in an 'in house' EMS for smaller lower risk operations?

## 2.2.4 Incidents and non-conformances.

All incidents and non-conformances should be recorded. This includes those reported by external people as well as those picked up in monitoring, reviews and audits of the site.

Incidents that require investigation include any malfunction, breakdown or failure of plant or equipment or techniques and any near misses which affect or potentially affect the environment. Non-conformances include where the management system is not followed as well as non-compliances with the conditions in the permit.

If an incident or non-conformance occurs the EMS should be reviewed to find the root cause of the problem and steps should be taken to ensure that there is no re-occurrence. The findings of the review should be communicated to employees to

ensure they understand any changes that need to be made to operations or procedures.

Table 8 may be useful in [recording accidents and incidents](#) which occur on site. Table 9 may be useful in [recording non-conformances](#) which occur on site. Both these tables can be found in the annexes.

Operators should have site security measures in place, if necessary, to prevent unauthorised access to the site and any resultant pollution that unauthorised access may cause to the environment or human health. [How to Comply with Your Environmental Permit](#) gives further information on when site security is necessary. Site security measures should be recorded in the EMS and any breaches of security should also be recorded.

## 2.2.5 Closure

This does not apply to mobile plant, stand-alone water discharge activities or stand-alone groundwater activities.

Closing operations down is probably the last thing on operators minds when they first apply for a permit and start up operations. However, this is the time where operators

will need to put in place plans for closure of their site. This is because when the Environment Agency receives an application to surrender a permit, it requires operators to show that the site has been returned to its original state. It's therefore, especially important to ensure operators know the state of the land where the



# What should be included in an 'in house' EMS for smaller lower risk operations?

permitted activities will be taking place, prior to starting the activities.

The permitted sites management system will need to ensure that processes are in place to record details of how the land under the site was thoroughly protected when the operations started and during operations under the permit. For example, by recording the use and maintenance of impermeable surfacing and leak tight drains. If there is historic contamination then you are advised to record details of this contamination. This should be recorded on the site map or plan.

The records of how the land was protected and where relevant, of any historic contamination will provide a point of reference, to be considered at permit surrender alongside records of any relevant spills and incidents which occurred during the time the site was permitted and what you did to rectify and clean up after those incidents.

Information and guidance on site condition reports can be found in [horizontal guidance document H5](#)

## 2.2.6 Complaints

All complaints received by an organisation about their activities must be recorded and acted upon. Table 10, in the annexes, contains an example [complaints record form](#). If the site receives a complaint this form should be completed and shown to the Environment Agency when they visit the

site. The forms can be used as evidence that any complaints received have been taken seriously and that actions have been taken to rectify any problems identified, especially if the Environment Agency has also received the same complaint.

## 2.2.7 Staff training and competence

**1.1.3** (Typically on the permit) Any person having duties that are or may be affected by the matters set out in this permit shall have convenient access to a copy of it kept at or near the place where those duties are carried out.

There must be enough competent staff to manage and operate the sites activities without causing pollution. Staff must be competent in the activities they are expected to carry out. Staff are expected to not only be competent in normal situations



# What should be included in an 'in house' EMS for smaller lower risk operations?

but also be adequately trained so that they are competent in abnormal situations such as plant failures or accidents.

Staff roles and responsibilities must be clearly defined and names must be placed against each role and responsibility for example, who is the technically competent person for the site. Documentation stating who is in charge of ensuring compliance with each part of the permit and other relevant legislation and guidance must be kept. These documents must be updated at regular intervals especially if staff change roles or leave the organisation. [Table 11](#) could be used to record this information.

Any person with duties that are controlled by the permit should have convenient access to a copy of it, kept at or near the place where they work. This includes not only staff but any contractors that may be working on the site as well. The copy may be in paper form or electronically available. The most important aspect is that staff and

contractors are aware of the permit, what is contained in it, what their obligations are under it and where and how to access it.

The [training checklist and record forms](#) tables 12 and 13 may help to ensure that the recording requirements for training received by staff are met. The training checklist can be used to identify the training required for each different role in the organisation. It will need to be modified for each specific site. The training requirements listed on the forms are examples only.

There is also a [delegation of responsibilities form](#), table 14. This form is to be used when a member of staff is away from work, for example annual leave, on long term sick leave or on maternity leave. This is to ensure that the duties normally carried out by that person are delegated to another suitably trained person.

## 2.2.8 Odour, noise and emissions management plans

### **If specified in your environmental permit.**

The Environmental Permitting Regulations require the control of pollution including odour, noise and emissions. The potential impacts of these need to be controlled as they can have serious adverse impacts on the environment and human health. Odour,

noise and emissions management plans must be included as part of a sites EMS, as the plans will include information on how to minimise adverse impacts arising from any odour, noise or emissions produced as part of the activities carried out on the site.

# What should be included in an 'in house' EMS for smaller lower risk operations?

Information about what should be included in each of the plans can be found at the links described below.

Detailed guidance on odour management and a list of activities which frequently cause odour issues can be found in [horizontal guidance document H4](#).

Sector specific guidance can also be found at the above link.

Detailed guidance on how to produce a noise management plan can be found in [horizontal guidance document H3](#).

More information on emissions management plans can be found in [How to Comply with your Environmental Permit](#).

## 2.2.9 Documentation of legislation and other requirements

Operators must keep a record of any applicable environmental obligations, permits, exemptions, codes of practice, legislation and any other requirements they are signed up to.

The legislation which is relevant to the permit holder's activities must be kept, preferably on a register along with the names of those people in the organisation who are responsible for ensuring it is complied with.

[Netregs](#) can help organisations identify which legislation is applicable to them.

The requirements of any permit or authorisation an organisation may have from the Environment Agency should also be included in this register, along with who

has responsibility for ensuring that it is complied with.

Also remember to include other commitments the business has, for example, an agricultural business who have membership of the Assured Farmers and Growers organisation, Assured Chicken Producers, Farm Assured Welsh Livestock, Assured Dairy Farms and so on, must ensure that the requirements of these commitments are included in the register of legal and other requirements.

Industry codes of practice, for example, quality protocols being used on the site and non-regulatory guidelines should also be included here.

Table 15 contains an example [register of legislation and other obligations](#).

# What should be included in an 'in house' EMS for smaller lower risk operations?

Remember in order for any EMS to be effective it must be implemented, and there

must be evidence in the day to day activities taking place on the site that the EMS is being used.

# 4

## Annexes

**4.1 Appendices**

**4.2 Other sources of information**

# Appendices

## Other sources of information

### 4 Annex

#### 4.1 Appendices

Some example EMS's have been developed which may prove useful. When a new permit is issued the operator will be sent a copy of an example EMS if one exists for their permitted activity. The permitted activities covered along with their links are listed below:

- [Management toolkit for operators holding a stand alone permit for the discharge of up to 20 cubic metres per day of secondary treated sewage effluent to surface waters.](#)
- [Management toolkit for operators holding a stand alone permit for the discharge of up to 20 cubic metres per day of sewage effluent via an infiltration system to groundwater.](#)
- [Management toolkit for operators holding a permit to discharge waste pesticide washings to land.](#)
- [Management toolkit for operators holding a permit to discharge to land, enzyme treated sheep dip.](#)
- [Management toolkit for operators holding a permit to discharge to land used sheep dip.](#)
- [Management toolkit for permit holders holding permits for general waste sector sites.](#)
- [Management toolkit for end-of-life vehicle authorised treatment facilities.](#)
- [Management toolkit for metal recycling businesses.](#)
- [Management toolkit for the food and drink industry.](#)
- [Management toolkit for general sector businesses.](#)

#### 4.2 Other sources of information

- Envirowise <http://www.envirowise.gov.uk/>
- ISO 14001 [http://www.iso.org/iso/management\\_standards.htm](http://www.iso.org/iso/management_standards.htm)
- EMAS <http://www.iema.net/ems/emas>
- EMAS toolkit for small organisations <http://ec.europa.eu/environment/emas/toolkit/>
- BS 8555 Acorn Scheme [http://www.iema.net/ems/acorn\\_scheme/acornpart](http://www.iema.net/ems/acorn_scheme/acornpart)
- Green Dragon Environmental Standard <http://www.groundworkinwales.org.uk/greendragon/index.html>
- Environment Agency [www.environment-agency.gov.uk](http://www.environment-agency.gov.uk)

## Other sources of information

- Further information on preventing pollution can be found in our Pollution Prevention Guidelines available on our web site at [www.environment-agency.gov.uk/ppg](http://www.environment-agency.gov.uk/ppg)
- Netregs <http://www.netregs.gov.uk/>
- MAGIC is a web based interactive map service which may be useful in finding local sensitive sites. [www.magic.gov.uk](http://www.magic.gov.uk)
- The fire and rescue manual has information on spill response. It can be found at;
- <http://www.communities.gov.uk/publications/fire/environmentprotectvol2>
- WAMITAB <http://www.wamitab.org.uk/>
- Regulatory Guidance Notes. These documents are designed to help you understand the Environmental Permitting Regulations <http://www.environment-agency.gov.uk/business/topics/permitting/36419.aspx>
- Radioactive substances regulation: management arrangements <http://www.environment-agency.gov.uk/business/sectors/32517.aspx> (nuclear) and <http://www.environment-agency.gov.uk/business/sectors/32481.aspx> (non-nuclear).

**Table 1 Environmental impacts plan and controls - Example**

<b>Table 1</b>																					
<b>Site Activity:</b>																					
The key pieces of environmental legislation affecting this sector are:  <i>(Add as many as apply to your site activities – you should ensure that this list is kept up to date for your site and covers all applicable legislation)</i>				<ul style="list-style-type: none"> <li>• The Environmental Permitting (England and Wales) Regulations 2010.</li> <li>• Groundwater regulations 1998, SI 2746</li> <li>• Water Resources Act 1991, as amended.</li> <li>• Environmental Protection Act 1990</li> <li>• Control of Pollution (Oil Storage) (England) Regulations 2001, SI 2954</li> </ul>				<ul style="list-style-type: none"> <li>• Hazardous Waste Regulations (2005)</li> </ul>													
Process / Activity/Equipment				A	W	E	D	L	N	R	Process / Activity/Equipment				A	W	E	D	L	N	R
<b>Processes / Activities / Equipment at your site:</b> (insert H or M or L where applies)				e.g. Oil / water separator – operation	L	H	-	H	L	-	-										
List all the processes / activities / equipment at your site in these columns.				Fuel Delivery and offloading																	
Then put an (H) high impact, or (M) medium impact, or (L) low impact in the box next to the process / activity / equipment if it can result in an environmental impact listed below under normal or abnormal operation.				Chemicals storage																	
				Surface water drainage																	
				Sorting																	
				e.g. Boilers for raising steam	H	-	H	-	-	M	M										
				<i>Others: (specify)</i>																	
<ul style="list-style-type: none"> <li>• Emissions to Air (including dust) - <b>A</b></li> <li>• Emissions to Water - <b>W</b></li> <li>• Energy Usage (for example, electricity, gas, oil) - <b>E</b></li> <li>• Waste Disposal - <b>D</b></li> <li>• Land Contamination - <b>L</b></li> <li>• Nuisance (i.e. noise or odour) - <b>N</b></li> <li>• Resource Consumption (for example, water, chemicals, not energy) - <b>R</b></li> </ul>																					



**Environmental impacts plan and controls (Table 1 - Continued)**

<b>Table 1</b>																	
<b>Site Activity:</b>																	
<p>The key pieces of environmental legislation affecting this sector are:</p> <p><i>(Add as many as apply to your site activities – <b>you should ensure that this list is kept up to date for your site and covers all applicable legislation</b>)</i></p>	•							•									
	Process / Activity/Equipment	A	W	E	D	L	N	R	Process / Activity/Equipment	A	W	E	D	L	N	R	
<p><b>Processes / Activities / Equipment at your site:</b> (insert H or M or L where applies)</p> <p>List all the processes / activities / equipment at your site in these columns.</p> <p>Then put an (H) high impact, or (M) medium impact, or (L) low impact in the box next to the process / activity / equipment if it can result in an environmental impact listed below under normal or abnormal operation.</p> <ul style="list-style-type: none"> <li>• Emissions to Air (including dust) - <b>A</b></li> <li>• Emissions to Water - <b>W</b></li> <li>• Energy Usage (for example, electricity, gas, oil) - <b>E</b></li> <li>• Waste Disposal - <b>D</b></li> <li>• Land Contamination - <b>L</b></li> <li>• Nuisance (i.e. noise or odour) - <b>N</b></li> <li>• Resource Consumption (for example, water, chemicals, not energy) - <b>R</b></li> </ul>																	

**For each Process / Activity / Equipment identified in the Table 1 above complete the following tables if there is an environmental impact [at least High (H) or Medium (M)] under normal or abnormal operation (*the examples included are guidance only*)**

**Table 2A. Emissions to Air [A] (use as many forms as required)**

Process / Activity / Equipment on Site	Potential Impact	Is impact controlled by equipment ?	Is equipment included on maintenance checklist?	Is impact controlled by a procedure?	Person using the procedure received training?	Comments
For example, flue Gas Emissions from boilers raising steam – Gas / Oil Fired	Flue Gas emissions include CO2 a greenhouse gas contributing towards global warming; NOx contributes to acidification, potential for local air quality issues with dust	Yes – boiler operation	Yes - Boilers on list	Yes – Boiler operation	Yes	Boilers gas fired – operator trained and burners and dampers regularly maintained.
For example, dust from site activity A ( <i>state specific activity</i> )	Potential for local air quality issues from dust. Also, a cause for complaints					
<i>Add any other that apply</i>						

**Table 2A (Continued) Emissions to Air [A] (use as many forms as required)**

Process / Activity / Equipment on Site	Potential Impact	Is impact controlled by equipment ?	Is equipment included on maintenance checklist?	Is impact controlled by a procedure?	Person using the procedure received training?	Comments
<i>Add any other that apply</i>						

**Table 2B. Energy Usage [E] (use as many forms as required)**

Process / Activity / Equipment on Site	Potential Impact	Is impact controlled by equipment?	Is equipment included on maintenance checklist?	Is impact controlled by a procedure?	Person using the procedure received training?	Comments
For example, electricity usage for large machine / activity A ( <i>state specific machine / activity</i> )	The impacts associated with electricity production are well documented (for example, air emissions) There is scope to reduce these impacts by using electricity efficiently on site.					
For example, electricity usage for large machine / activity B ( <i>state specific machine / activity</i> )	The impacts associated with electricity production are well documented (for example, air emissions) There is scope to reduce these impacts by using electricity efficiently on site.					
<i>Add any other that apply</i>						

**Table 2B (Continued) Energy Usage [E] (use as many forms as required)**

Process / Activity / Equipment on Site	Potential Impact	Is impact controlled by equipment?	Is equipment included on maintenance checklist?	Is impact controlled by a procedure?	Person using the procedure received training?	Comments
<i>Add any other that apply</i>						

**Table 2C. Emissions to Water [W] (use as many forms as required)**

Process / Activity / Equipment on Site	Potential Impact	Is impact controlled by equipment?	Is equipment included on maintenance checklist?	Is impact controlled by a procedure?	Person using the procedure received training?	Comments
For example, oil/water separator	Oil passes through the separator into a watercourse potentially causing harm to environment	Yes – separator operation	Yes – see separate checklist	Yes – Procedure listed	Yes – November 2009	
For example, surface water run-off from buildings, car parks and concrete hard standing	Under normal conditions surface water run-off should be uncontaminated. However, if contamination occurs by accident, it has the potential to cause water pollution to local watercourse if there is a site drain failure					The accidental contamination case is considered in our Accident / Incident Management Plan
<i>Add any other that apply</i>						

**Table 2C (Continued) Emissions to Water [W] (use as many forms as required)**

Process / Activity / Equipment on Site	Potential Impact	Is impact controlled by equipment?	Is equipment included on maintenance checklist?	Is impact controlled by a procedure?	Person using the procedure received training?	Comments
<i>Add any other that apply</i>						



**Table 2D. Waste Disposal [D] (use as many forms as required)**

Process / Activity / Equipment on Site	Potential Impact	Is impact controlled by equipment?	Is equipment included on maintenance checklist?	Is impact controlled by a procedure?	Person using the procedure received training?	Comments
For example, hazardous Waste from activity A (state specific machine / activity)	Chemicals, ink jet cartridges, fluorescent tubes, waste oils, all must be handled in accordance with Hazardous Waste Legislation					
For example, general unsorted waste	Most general unsorted waste is landfilled and this has associated impacts e.g. ecotoxicity, global warming and nuisance e.g. odour. General waste volumes can be reduced if sorting systems are used. Need to meet legal Duty of Care requirements.					
<i>Add any other that apply</i>						

**Table 2D (Continued) Waste Disposal [D] (use as many forms as required)**

Process / Activity / Equipment on Site	Potential Impact	Is impact controlled by equipment?	Is equipment included on maintenance checklist?	Is impact controlled by a procedure?	Person using the procedure received training?	Comments
<i>Add any other that apply</i>						

**Table 2E. Nuisance (e.g. Noise, Odour) [N] (use as many forms as required)**

Process / Activity / Equipment on Site	Potential Impact	Is impact controlled by equipment?	Is equipment included on maintenance checklist?	Is impact controlled by a procedure?	Person using the procedure received training?	Comments
For example, noise from site activities ( <i>state specific activity, for example, crushing</i> )	Section III of the Environmental Protection Act 1990 , noise can be classified as a statutory nuisance					
For example, noise from transport movement on site	Section III of the Environmental Protection Act 1990 , noise can be classified as a statutory nuisance					
For example, odour from site activities ( <i>state specific activity</i> )	Section III of the Environmental Protection Act 1990 , odour can be classified as a statutory nuisance					
<i>Add any other that apply</i>						

**Table 2E (Continued) Nuisance (e.g. Noise, Odour) [N] (use as many forms as required)**

Process / Activity / Equipment on Site	Potential Impact	Is impact controlled by equipment?	Is equipment included on maintenance checklist?	Is impact controlled by a procedure?	Person using the procedure received training?	Comments
<i>Add any other that apply</i>						

**Table 2F. Resource Consumption (not energy) [R] (use as many forms as required)**

Process / Activity / Equipment on Site	Potential Impact	Is impact controlled by equipment?	Is equipment included on maintenance checklist?	Is impact controlled by a procedure?	Person using the procedure received training?	Comments
For example, use of chemicals for activity A ( <i>state specific activity</i> )	Harm to human health or escape to the local environment. Management of hazardous substances according to COSHH and Hazardous Waste Regulations					
For example, use of hydraulic oil for machine A ( <i>state specific machine</i> )	Harm to human health or escape to the local environment. Management of hazardous substances according to COSHH and Hazardous Waste Regulations					
For example, use of water	Inefficient use results in natural resource depletion					
<i>Add any other that apply</i>						

**Table 2F (Continued) Resource Consumption (not energy) [R] (use as many forms as required)**

Process / Activity / Equipment on Site	Potential Impact	Is impact controlled by equipment?	Is equipment included on maintenance checklist?	Is impact controlled by a procedure?	Person using the procedure received training?	Comments
<i>Add any other that apply</i>						

**Table 2G. Land Contamination (e.g. storage of hazardous substances) [L] (use as many forms as required)**

Process / Activity / Equipment on Site	Potential Impact	Is impact controlled by equipment?	Is equipment included on maintenance checklist?	Is impact controlled by a procedure?	Person using the procedure received training?	Comments
For example, Storage of substance A ( <i>specify specific substance</i> )	Substance A can cause harm to the ecotoxicity of the soil, and could leak into groundwater.					
<i>Add any other that apply</i>						



**Table 2G (Continued) Land Contamination (e.g. storage of hazardous substances) [L] (use as many forms as required)**

Process / Activity / Equipment on Site	Potential Impact	Is impact controlled by equipment?	Is equipment included on maintenance checklist?	Is impact controlled by a procedure?	Person using the procedure received training?	Comments
<i>Add any other that apply</i>						

**Table 3. General Waste Management (use as many forms as required)**

Waste Produced at Site <i>(with EWC, if known)</i>	Where does the waste go?	Can it go to recovery / recycling?	Is it being stored correctly on site?	Are Duty of Care requirements being met?	Comments
For example, General waste (EWC ref) sent for disposal	ABC landfill	No – Checked on 1/11/09	Yes – Checked on 1/11/09	Yes – Checked on 1/11/09	State the checks that were made and refer to any documentation

**Table 3 (Continued) General Waste Management (use as many forms as required)**

Waste Produced at Site (with EWC, if known)	Where does the waste go?	Can it go to recovery / recycling?	Is it being stored correctly on site?	Are Duty of Care requirements being met?	Comments

**Table 4. List of Procedures (list procedures identified in Table 2A to 2G above, and any other procedures you have in addition)  
(use as many forms as required)**

Procedure Name	What process / activity / equipment does it relate to?	Where is the procedure kept?	Version Number	When was the procedure last reviewed?	Comments
For example, Boiler A Operation	Boiler A operation using fuel oil	Site office – control room file cabinet	2	1/11/09	Version 1 replaced as new monitoring equipment has been added to the boiler

**Table 4 (Continued) - List of Procedures** *(list procedures identified in Table 2A to 2G above, and any other procedures you have in addition)*  
*(use as many forms as required)*

Procedure Name	What process / activity / equipment does it relate to?	Where is the procedure kept?	Version Number	When was the procedure last reviewed?	Comments

**Table 5 Maintenance checklist**

*Use as many forms as required (the examples may or may not be applicable for your site – amend as appropriate)*

Item requiring maintenance	How often? Every: (tick the appropriate box)						Where are maintenance instructions?	Who is responsible?
	Day	Week	Month	Year	2 years	5 years		
Check the oil separators		✓					Cabin wall	Mr A Person
Check drains and drainage channels for blockages.		✓						
Clean up spills on surfaced areas or tank bunds	✓							
Check state of fences and gates – (to avoid vandals or children getting in and, for example, letting liquids out of a tank).		✓						
Visually check the un-surfaced areas to ensure that there are no spills. Clean up if necessary.		✓						
Check bunds are not filling with rainwater – pump out if necessary (via the oil interceptor).			✓					
Check bunds to make sure they aren't damaged or leaking, for example cracks or deformation from impact damage.		✓						
Check the de-pollution area concrete for cracks or excessive oil.				✓				
Inspect the bunds for potential leaks, cracks, holes and so on.				✓				
Add appropriate items for your site								

### Table 5 Maintenance checklist

Use as many forms as required, photocopy this blank form before first use to ensure you have easily accessible copies for the future.

Item requiring maintenance	How often? (tick the appropriate box)						Where are maintenance instructions?	Who is responsible?
	Day	Week	Month	Year	2 years	5 years		

**Table 6 Maintenance record**

<b>Item: inspect fences</b>		<b>Due: weekly</b>
<b>Completed on</b>	<b>Completed by</b>	<b>Comments</b>
<i>For example, 27-02-09</i>	<i>A Person</i>	<i>Bund around oil tank cracked. Crack repaired and bund resealed.</i>



**Table 7 Accident/incident plan**

Possible Accident / Incident	What would the environment harm be?	How do we reduce the chances of it happening?	What to do if it happens
<b>Spillages</b>			
Spillage during transfer, sorting, crushing and compaction of wastes.	Contamination of land, drains, groundwater and watercourses.	Inspect and validate all incoming wastes. Remove hazardous liquids from wastes prior to processing. Train the staff	Follow the spill response procedure. It describes what to do in the event of a spill and where the spill kit is kept.
Spillage during delivery of oil or fuel.		Supervise fuel deliveries. Use drip trays and spill materials.	
Spillages during refuelling of plant and equipment.		Plant and equipment will be refuelled in designated areas with impervious surface and will use drip trays and spill materials.	
Slow seepage of liquids from imported contaminated materials. Slow seepage can be less noticeable than 'spills'.		Incoming materials that are contaminated for example cutting oil or tramp fluid on swarf, will only be stored on impervious surfaces that are drained to an oil interceptor	
<b>Overfilling</b>			
Overfilling of oil / fuel tanks during delivery.	Contamination of land, drains, groundwater and watercourses.	Stock level control checks, supervised delivery and high level alarms.	Spill response procedure as described above.
<b>Failure of Plant or Equipment</b>			
Leakages; due to faulty pipe work, valves, over-pressure, blockages, corrosion, severe weather, ground movement and so on.	Contamination of land, drains, groundwater and watercourses.	Daily visual inspection and completion of weekly inspection checklist record. Preventative maintenance regime. Any underground pipes and tanks will be tested for integrity. Insulation and protection of pipe work.	Spill response procedure as described above.

Puncture; of vessels and tanks etc due to impact – such as fork lift trucks.	Contamination of land, drains, groundwater and watercourses.	Tanks and vessels generally located within / on secondary containment facilities. Storage locations of drums and non-permanent vessels protected by use of barriers or fencing. Movement of drums and containers using safe techniques.	Spill response procedure as described above.
<b>Fire</b>			
Fire	Smoke and pollution, Firewater causes contamination of land, groundwater and watercourses.	Separation of incompatible materials and of combustible materials and ignition sources. Incorporation of fire breaks into site layout and containment of fire water. No smoking policy. Maintain tidy site and minimize stockpile of combustible materials. Fire training and emergency drills.	Fire procedure describing what to do in the event of a fire, including details about fire alarms, exit routes and muster points, responsible personnel such as a fire warden and the location and use of emergency fire equipment such as extinguishers, hoses, sand bags and drain covers.
<b>Cross contamination</b>			
Due to transfer and mixing of incompatible materials, drainage cross connections and so on.	Explosion, smoke and pollution of air, Contamination of land, drains, groundwater and watercourses.	Maintenance of up to date drainage plan. Maintenance of inventory of substances with material property details. Procedure for contractors to work on site including induction training and permit to work. Fail-safe filling systems.	Fire procedure as described above.
<b>Flood</b>			
Due to ingress of watercourse floodwater, blocked drains, burst water main, use of fire water.	Contamination of raw materials, buildings, land, drainage system, groundwater and watercourses with fire and flood water.	Maintenance of drains. Fitting of flap / non return valves on drains. Safe location for storage of hazardous materials.	Flood procedure describing what to do in the event of a flood warning such as installation of barge boards, use of sand bags, movement or protection of sensitive materials.

<b>Failure of Services</b>			
Due to failure of supply; water, electricity, gas supply and of sewerage system. Due to utility supply being struck and broken / cut.	Flooding, explosion with subsequent contamination of land, drains, groundwater and watercourses.	Provision of standby facilities. Maintenance of up to date plans showing location of utility services. Procedure for contractors to work on site including induction training and permit to work.	Utility supply failure procedure describing what to in the event of services supply failure such as manual shut down of process valves; start up of emergency generator, use of standby materials etc. Flood and fire procedure as described above.
<b>Failure of Containment</b>			
Failure of containment facilities due to land movement, impact, corrosion and so on.	Contamination of land, drains, groundwater and watercourses.	Provision of secondary containment for hazardous liquids. Inspection of primary and secondary containment facilities. Integrity testing of tanks and bunds & pressure loss alarms.	Spill response procedure as described above.
<b>Vandalism</b>			
Unauthorised entry and tampering or malicious damage to property, plant and equipment.	Contamination of land, drains, groundwater and watercourses.	Secure gate and perimeter fence. Site locked when un-manned, tanks and valves locked when not in use out of hours. Plant and equipment locked in secure storage out of hours. Security system installed including camera and recording facilities.	Spill response procedure as described above.

**Table 8 Accident and incident record**

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 action did you take to fix the problem? Were external agencies involved?	
What have you done to make sure that it does not happen again?	
Was there any significant pollution – for example: oil entering a surface water drain. If so what?	
If there was then you must notify the Environment Agency on 0800 807060 ASAP. Have you done so?	Yes/No/not applicable Time: Date: E.A Incident number:
Please print your name and sign	

**Table 9 Record of non-conformances**

Date and time non-conformance identified	
What happened, what was it about and what permit condition does it relate to?	
What caused it?	
What have you done to make sure that it does not happen again?	
Have you reviewed the EMS and rolled out any changes to operations and procedures? Include dates.	
Was there any significant pollution – for example: oil entering a surface water drain. If so what?	
If there was then you must notify the Environment Agency on 0800 807060 ASAP. Have you done so?	Yes/No/not applicable  Time:  Date:  E.A. Incident number:
Please print your name and sign	

### Table 10 Complaints record

Who made the complaint?	Name:	
	Address	
	Phone No	
Date and time they made the complaint		
What happened, what was it about?		
Was anyone else aware of this – other neighbours or your staff? If so who?		
Assuming the complaint relates to your site, what was the problem, what went wrong? If you can't find the source of the problem you should contact a suitably qualified person to do so and record who they were and what the problem was.		
What have you done to make sure that it does not happen again?		
Was there any significant pollution – for example: excessive odour which can be smelt off site or spillage of untreated sewage onto the ground into a drain or a watercourse? If so the Environment Agency must be informed.		
If there was then you must notify the Environment Agency on 0800 807060 ASAP. Have you done so?		Yes/No/not applicable 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/not applicable Time: Date: EA incident number:
Please print your name and sign:		

**Table 11 Staff responsibilities**

<b>Name</b>	<b>Role</b>	<b>Part of permit responsible for</b>	<b>Any other legislative responsibilities</b>	<b>Required training received?</b>

### Table 12 Training checklist

*Use as many of these forms as required*

*(the examples included may or may not be applicable for your site – amend as appropriate)*

JOB	TRAINING REQUIRED (tick boxes to show who needs which training)														COMMENTS	
	Environmental awareness						Maintenance/operations						Accidents and emergency			
	Certificate of Technical Competence	Supervision of waste management sites	Environmental and permit awareness	Waste receipt inc Duty of Care	Waste separation and storage	Awareness of local sensitive sites for example sites of special scientific interest	Maintenance of mechanical grab	Maintenance of separation conveyor	add skills appropriate to your site				Fire procedure	Spill response procedure		Flood procedure (where applicable)
Site Manager																
Site Supervisor	√	√		√		√		√					√	√	√	√
Site operator A			√		√		√									
Site operator B																
Contractor 1																

Other jobs e.g. Operator A (Grab), Operator B (Separator), Operator C (Trainee), Contractor 1(Maintenance).



**Table 13 Training record**

<b>Employee Name</b>	<b>Job Title</b>
----------------------	------------------

Training Required	Date due	Date done	Passed as competent? yes/no	Reviewers Signature	Date for Refresher	Comments

**Table 14 Delegation of responsibilities**

Name of employee to be absent	
Job title/role to be filled during absence	
Department	
Absence type e.g. maternity leave.	
Name of employee covering absences role	
Part/s of permit employee is responsible for	
Any other responsibilities the employee will be covering.	
Length of time cover will be for.	
Any training required to enable employee to cover the role effectively and competently.	



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