CONSTRUCTION SURFACE WATER MANAGEMENT PLAN

Site Name:

Contractor Name:

Reference Number:

Planning Application No:

August 2018

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Content Amendment Record

Issue No	Revision	Description	Date	Signature

1. Introduction & Aim

1.1 The requirement for a Construction Surface Water Management Plan (CSWMP) is based on the duty to ensure that surface water quality and quantity is managed throughout the construction process to mitigate impacts off site.

2. Site Details

2.1 Location:

3. Roles & Responsibilities

3.1 This section identifies the key roles and responsibilities for the scheme. This is to be completed by the appointed contractor.

Role	Contact	Company Name & Address	Contact No & Email	Key Responsibilities

4. Managing Surface Water During Construction

Tick one option box from the type of surface water system you intend to use and supply details as an appendix.

Option 1.

Build, use and remediate permanent surface water drainage system

Option 2.

Install, use and remove a temporary surface water drainage system

Option 3.

Utilise existing system with pollution control measures (Brownfield sites only)

Details to include:

- Construction Surface Water Drainage System Design
- Construction Management, Maintenance and Remediation Schedules
- Required Consents (e.g. Land Drainage Act, Environmental Permit etc)
- Flood Risk Controls
- Pollution, Water Quality & Emergency Control Measures
- Phasing Plan (if required)
- Construction Site Plan showing compounds, material storage areas, temporary site parking etc



5. Flood & Weather Alert

5.1 Flood Alert (River and Sea Flood Risk)

Project Manager and Works Manager should sign up to the Environmental Agency flood warning system https://www.gov.uk/sign-up-for-flood-warnings if the site is within a flood zone 2 or 3.

Alert Level	Definition	Action	Responsibility
Flooding Alert	Flooding is possible – be prepared		
Flood Warnings	Flooding is expected – immediate action required		
Severe Flood Warning	Severe flooding danger to life		



5.2 Weather Alerts (Surface Water Flood Risk)

Project Manager and Works Manager should sign up to the Met Office weather warning system https://www.metoffice.gov.uk/public/weather/warnings

Alert Level	Definition	Action	Responsibility
Yellow: Be Aware	Yellow warnings can be issued for a range of weather situations. Many are issued when it is likely that the weather will cause some low- level impacts, including some disruption to travel in a few places. Other yellow warnings are issued when the weather could bring much more severe impacts to many people but the certainty of those impacts occurring is much lower. It is important to read the content of yellow warnings to determine which weather situation is being covered by the yellow warning.		
Amber: Be Prepared	There is an increased likelihood of impacts from severe weather, which could potentially disrupt your works plans. This means there is the possibility of travel delays, road and rail closures, power cuts and the potential risk to life and property.		
Red: Take Action	Dangerous weather is expected and, if you haven't already done so, you should take action now to keep yourself and your works force safe from the impact of the severe weather. It is very likely that there will be a risk to life, with substantial disruption to travel, energy supplies and possibly widespread. You should avoid travelling, where possible, and follow the advice of the emergency services and local authorities.		

6. Legislation & Guidance

The Water Environment (England and Wales) regulation 2009

Land Drainage Act 1991

SEPA Engineering in the Water Environment Good Practice Guide Temporary Construction Methods

Methods

Control of Water Pollution from Construction Sites – Guide to Good Practice (SP156)

Control of Water Pollution from Construction Sites – Guidance for Consultants and Contractors (C532)

Control of Water Pollution from Linear Construction Projects – Technical Guidance (C648

Control of Water Pollution from Linear Construction Projects – Site Guide (C649)

Environmental Good Practice – Site Guide (C650)

The SUDS Manual (C753)

BS 8582:2013 Code of practice for surface water management for development sites

BS 8582:2013 Code of practice for surface water management for development sites

7. Company, Contractor Accreditation (e.g.ISO) and Environmental Policies

8. Appendices List



APPENDIX A

CONTENT

PDC Engineering Construction Surface Water Management Plan. Revision 0



Construction Surface Water Management Plan Revision 0

Job No. 29514

Proposed Extension to The Mill at Roger Skinner Ltd. Queen Street Stradbroke Suffolk IP21 5HL

Client: Roger Skinner Ltd.

February 2024

Civil • Structural • Environmental • Surveying





REPORT CONTROL SHEET

Client:	Roger Skinner Ltd.	Job No.:	29514
Project Name:	Proposed Extension to the Mill at Roger Skinner Ltd.		
	Queens Street		
	Stradbroke		
	Suffolk		
	IP21 5HL		

Issue				
		Report Prepared by:		
Devision O	Eshmany 2024	Chloe Spencer M.Sc, AMIEnvSc Senior Environmental Consultant		
Revision U	February 2024	Report Reviewed & Authorised by:		
		Matt Hare B.Sc, CEng, MCIWEM, C.WEM, MICE, MIMechE Director - Infrastructure		

CONDITIONS OF INVESTIGATION & REPORTING

This report and its findings should be considered in relation to the terms of the brief and objectives agreed between PDC Engineering and the Client.

PDC Engineering are only able to work with information available at the time the Construction Surface Water Management Plan is carried out which have been applied to the Construction Surface Water Management Plan in accordance with current best practice. PDC Engineering cannot be held responsible for any subsequent flooding to the development or surrounding area.

The details contained in this Construction Surface Water Management Plan are based upon information provided by others and upon the assumption that all relevant information has been provided by those parties from whom it has been requested and that such information is accurate. Information obtained by PDC Engineering has not been independently verified by PDC Engineering, unless otherwise stated in the report.

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APPENDIX A

Silt Control Toolbox Talk⁽⁶⁾



1.0 INTRODUCTION

1.1 Background Information

This Construction Surface Water Management Plan (CSWMP) was prepared by PDC Engineering. The report was commissioned by Hollins Architects on behalf of Roger Skinner Ltd.

This has been prepared to address Mid Suffolk District Council's Planning Condition 20 of Planning Application, Reference DC/22/02971, for the erection of an extension to the existing factory facility to provide additional packing and storage space on Roger Skinner Ltd, Queen Street, Stradbroke, IP21 5HL, referred to here within as the site.

1.2 Objectives

This CSWMP has been prepared in response to Mid Suffolk District Council's Planning Condition 20, that requested the following;

"Prior to commencement of development, details of a Construction Surface Water Management Plan (CSWMP) detailing how surface water and storm water will be managed on the site during construction (including demolition and site clearance operations) shall be submitted to and have been approved in writing by the Local Planning Authority. The CSWMP shall be implemented and thereafter managed and maintained in accordance with the approved Plan for the duration of construction. The approved CSWMP shall include: Method statements, scaled and dimensioned plans and drawings detailing surface water management proposals to include:-

- *i.* Temporary drainage systems
- *ii. Measures for managing pollution / water quality and protecting controlled waters and watercourses*
- *iii.* Measures for managing any on or offsite flood risk associated with construction

Reason - To ensure the development does not cause increased flood risk, or pollution of watercourses or groundwater."

A variety of public, published, and site-specific information sources have been consulted in the compilation of this report, a list of these sources can be found in **Section 8.0, References**.

2.0 SITE DESCRIPTION

2.1 Location & Site Setting

The proposed site is located in the settlement of Stradbroke, to the west of Queens Street (B1118), **Table 2.1** below provides a site summary, and **Figure 2.1** below details the site's location.

Site Summary	Details	
Site Address	The Mill at Roger Skinner Ltd., Queens Street, Stradbroke, Suffolk, IP21 5HL	
Coordinates (Easting & Northing)	622730, 274380	
Local Planning Authority	Mid Suffolk District Council	



Site Summary	Details
Lead Local Flood Authority (LLFA)	Suffolk County Council
Environment Agency Area of Responsibility	East Anglia
Internal Drainage Board (IDB)	None

 Table 2.1 Site summary⁽¹⁾



Figure 2.1 Location of the site, red line denotes the site boundary⁽²⁾.

The site is situated adjacent to the existing Roger Skinner Ltd. premises that primarily comprises of the Mill building. Agricultural land is located to the south, west, and north of the main site area.

A drainage ditch runs along the southern boundary of the site and two existing ponds are located to the east of the proposed extension.

2.2 Existing Site Layout & Topography

The majority of the existing site comprises undeveloped agricultural land, except the east of the site near the existing building which comprises gravel and concrete, and the north-east of the site which comprises part of an existing bund and lagoon as shown on Drawing No. 21707/003 in the **Drawings Appendix**.

The site will be accessible via an existing access road off Queens Street (the B1118) which is to the east of the site.



Ground levels vary across the site from 52.47m AOD in the north-west, to 53.31m AOD in the south. Levels along the bed of the ditch, lagoon, and the bund have been excluded from the range of existing ground levels⁽¹⁾.

2.3 Hydrology

As identified in **Section 2.1**, a drainage ditch runs along the southern boundary of the site, flowing in an east to west direction, before heading north-west along the western edge of the client's ownership boundary. Two existing ponds are also located to the east of the proposed extension. The client has confirmed that these are linked to the site's existing drainage system and outfall to the ditch along the eastern edge of Queen Street⁽¹⁾.

3.0 PROPOSED DEVELOPMENT

3.1 Description

The proposed development is for the construction of an extension to the Mill at Roger Skinner Ltd. An area of concrete will immediately surround the building to the west, and south, which will adjoin to the existing concrete to the south-east of the building. A proposed drainage basin will be located in the north-east of the site. Refer to Drawing No. 28100/805 in the **Drawings Appendix** detailing the proposed site layout. The site will continue to be accessible via an existing access road off Queens Street (the B1118) which is to the east of the site⁽¹⁾.

3.2 Proposed Surface Water Drainage

The surface water runoff from the proposed hardstanding will be conveyed to an attenuation basin. The basin will attenuate the flow prior to the water discharging at a restricted rate into the existing drainage system which outfalls into drainage ditch to the east of the site via a flow control⁽¹⁾.

The attenuation system will comprise of a 1.00m deep attenuation basin, including freeboard and a wet bench, with a bank slope of 1 in 4. A filter drain will run along the western extent of the yard to intercept the yard water and convey it to the basin⁽¹⁾.

The drainage system is designed to contain up to and including the 1 in 100 year rainfall event including climate change, refer to Drawing No.'s 29514/805 & 806 in the **Drawings Appendix** detailing the proposed drainage system, basin sections, and drainage details.

4.0 INSTALLATION OF THE DRAINAGE SYSTEM

During construction phase, before the new drainage system is installed, there is the potential for uncontrolled surface water runoff from the site. In order to mitigate against surface water flooding during construction activities, the construction works will be programmed so that the associated drainage infrastructure is constructed, and operational throughout the construction programme.

The installation of the surface water drainage network will therefore be undertaken during the early stages of the construction project which will enable the capture of surface water runoff.



The works will include the construction of the outfall into the existing surface water drainage system to the east of the site, however a penstock control will also be installed to enable controlled discharge into the system during the construction works.

5.0 **PREVENTION OF SEDIMENTS & POLLUTION ENTERING THE DITCH NETWORK**

During construction, and especially following the removal of any vegetation, there is the potential for sediments, and pollutants to be washed off-site within surface water runoff, which without mitigation has the potential to pollute on- and off-site ditches. Sediment within the water can result from a number of different activities on-site, and the following mitigation measures will be incorporated in the construction phase of works to minimise silt/sediment/pollution accumulation in the local ditch network.

Vigilant site management, and mitigation measures as detailed in Section 5.2, Good Site Practice will be incorporated into the construction phase of works to minimise the amount of sediment, and pollution accumulation entering into the drainage system or discharging off-site.

At no time should water containing silt outfall directly into the ditch network.

5.1 Attenuation Basin

The attenuation basin will enable the sediment build up to be easily monitored, and any required sediment removal activities to be undertaken, reducing the risk of pollution/sedimentation to the local ditch network.

When the basin is constructed a fixed sediment depth marker will be installed to enable the accumulation of sediment to be monitored during the construction phase, and allow the sediment to be removed as required. Before final completion, the attenuation basin will be dredged and the sediment removed, the new drainage system will also be inspected to ensure that all debris has been removed.

The sediment from the basin has the potential to contain low levels of pollutants such as metals, and hydrocarbons, therefore removal/disposal of this will be undertaken in accordance with the requirements of relevant waste management legislation.

Daily inspections of the basin will be undertaken, with additional inspections during periods of heavy rainfall.

At the end of each working day a visual inspection of the basin will be undertaken to confirm that the basin contains clean surface water runoff only, and settlement has occurred. Providing the inspection confirms this, discharge into the ditch network via the flow control and vortex separator will then be permitted. At the start of the next working day the penstock control will be re-installed to prevent discharge to the ditch. Should the inspection confirm that the water is not clean, the water will be pumped out into a tanker for appropriate off-site disposal. The basin and on-site drainage network will then be cleaned prior to discharge into the ditch.

Should any works lead to temporary excessive surface water ponding, in particular adjacent to the site boundaries which could result in off-site flooding, surface water will be pumped into the basin,



and additional measures potentially taken to prevent any flow e.g. installation or increasing the scale of soil bunds on-site.

If required, measures will be taken to prevent water entering into excavations through the use of cut-off ditches. Should water be generated from dewatering of excavations it will be pumped into the basin, to enable settlement.

The basin has the ability to intercept the majority of the sediment and pollution that would typically arise during the construction phase, and stop this from entering into the ditch network. However, through vigilant site management as detailed in the subsequent **Section 5.2, Good Site Practice** the amount of sediment, and pollution entering the basin will be limited.

5.2 Good Site Practice

5.2.1 Soil Bunds

Ground levels fall to the north, therefore should flow paths be identified during the construction phase, soil bunds should be installed to prevent the silty water discharging off-site or into the surrounding ditch network. Soil bunds restrict the flow of water and suspended sediments entering into the ditch network.

5.2.2 Emergency Spill Kits

As identified in **Section 2.1** & **2.3**, a drainage ditch runs along the southern boundary of the site and two existing ponds are also located to the east of the proposed extension.

Emergency spill kits will be kept on-site in areas appropriate to their risk. As part of the site induction all construction workers will be briefed on the importance of water quality, the location of the surface water drainage features on- and off-site, and the location and use of the spill kits.

The site operatives will be trained in their use and how to deal with any spillages of materials likely to contaminate the local ditch network.

All spill kits will be fully stocked at all times, and an inventory of equipment within the container will be clearly displayed on the lid.

In the event of a spillage, the material must be contained (using absorbent material such as sand, soil, or commercially available booms). In the event of a significant occurrence the Environment Agency should be notified immediately.

Spills that may pollute the water environment have the potential to result from variety of activities, the following will be considered when undertaking the below tasks;

• **Deliveries:** Special care will be taken during deliveries, especially when fuels, and hazardous materials are being handled. All deliveries will be supervised by a responsible person.



Storage tank levels will be checked prior to delivery to prevent overfilling, and to ensure that the product is delivered to the correct tank. Should a spillage occur, suitable materials should be readily available to contain the spill.

• **Refuelling:** The risk of spillage of fuel is greatest during the refuelling of plant. Mobile plant will be refuelled in a designated area, preferably on an impermeable surface away from any drains. A spill kit will be available in this location. Hoses and valves are to be checked regularly for signs of wear, and will be turned off and locked away when not in use. Any diesel pumps and similar equipment are to be placed on drip trays to collect minor spillages, trays will be checked regularly, and accumulated oil will be removed for disposal.

5.2.3 Use of Concrete and Cement Products

Concrete and cement products have the potential to have a serious impact on the water environment. It is essential to take particular care with all works involving concrete and cement. Construction of concrete structures during the construction phase shall be monitored to prevent associated contaminated material entering the surface water drainage network. Pre-cast work or permanent formwork shall be used where possible to reduce the amount of in-situ concreting required. Washing out of concrete wagons or other equipment used in concreting operations shall only be undertaken in designated contained washout areas. These shall be located away from the surface water drainage network, and shall be impermeable to prevent infiltration into the ground.

5.2.4 Storage of Substances that have the Potential to Cause Pollution

Some of the materials used within the construction process have the potential to cause pollution to the water environment, including fuel, oil, chemicals, cleaning materials, and paint. All of these substances must be sited on an impervious base, within a bund, and secured. The base and bund walls must be impermeable to the material stored and of an appropriate capacity. Leaking or empty oil drums must be removed from the site immediately, and disposed of via a licensed waste disposal contractor.

The contents of any tank will be clearly marked on the tank, and a notice displayed requiring that valves and trigger guns be locked when not in use. All valves and trigger guns are to be protected from vandalism and unauthorised interference.

All containers will be maintained and kept in a good condition to prevent any leaks and/or contamination of the surrounding area. General good housekeeping practices will be applied, and lightweight materials will be covered or weighted down.

Bowsers will be stored within a secure compound when not in use.

5.2.5 Geotextile Matting

All surface water drains in the working area or those susceptible to sedimentation during the construction process, will have a geotextile matting which will permit water to pass through but prevent silt and debris entering into the drainage network.



5.2.6 Placement and Covering of Soil Heaps

Soil heaps will be located and configured in a way that will reduce the risk of contamination of the local ditch network e.g. protective coverings used to prevent any erosion of the soil.

5.2.7 Stockpiling

Stockpiling of materials during construction may restrict flow and result in ponding of water on-site. In order to minimise flow paths across the site, stockpiling will be kept to a minimum and space will be provided between stockpiles to minimise the impact on overland flow.

5.2.8 Road Sweeping/Wheel Washes/Plant Washing Facilities

The requirement, and frequency of road sweeping will be dictated by site conditions.

Any wheel washes and plant washing facilities are to be securely constructed with no overflow, and the effluent will be contained for proper treatment, and disposal. The effluent will not be allowed to infiltrate into the ground.

5.2.9 Limiting Compaction of Natural Ground & Stripping Unnecessary Areas

Vehicles and traffic will be limited to main routes and set paths to avoid unnecessary compacting of soils across the site, which will reduce the natural drainage potential of the ground.

Unvegetated and newly disturbed areas will be limited in exposure to decrease the likelihood of erosion and runoff.

5.2.10 Weather Warnings

The site will register with the Met Office to receive Severe Weather Warnings, so that in the event of extreme wind, snow or rain, tasks that have the potential to cause sedimentation/pollution are postponed.

Severe weather warnings are available in a number of ways, including radio, television, the Met Office website, social media, smart phone apps, RSS, and via email alerts. Details on signing up to the email alert service are available on the Met Office webpage 'Guide to Email Alert Service' <u>https://www.metoffice.gov.uk/about-us/guide-to-emails</u>.

Table 5.2 below defines the Met Office alert levels, which range from Yellow (be aware) to Red (Take Action).



Alert Level	Definition	Action	Responsibility
Yellow Be aware	Severe weather is possible over the next few days and could affect you. Yellow means that you should plan ahead, thinking about possible travel delays, or the disruptions to day to day activities. The Met Office is monitoring the developing weather situation and Yellow means keep an eye on the latest forecast and be aware that the weather may change or worsen, leading to disruption of plans in the next few days.	Review site mitigation measures. Undertake any actions to ensure the site is prepared.	Site Manager
Amber Be prepared	There is an increased likelihood of bad weather affecting you, which could potentially disrupt plans, cause travel delays, road closures, interruption to power and the potential risk to life and property. Amber means you need to be prepared to change plans, and protect the site, and its workers from the impacts of the severe weather.	Review site mitigation measures. Undertake any actions to ensure the site is prepared.	Site Manager
Red Take action	Extreme weather is expected. Red means you should take action now to keep yourself and others safe from the impact of the weather. Widespread damage, travel, and power disruption, and risk to life is likely. You must	Review of site, take action to secure or move equipment and materials. Red alert will normally require the closure of site	Site Manager
	avoid dangerous areas and follow the advice of the emergency services and local authorities.	to protect the workforce.	

Table 5.2 Met Office alert levels and required site actions⁽³⁾.

6.0 **PRIOR TO OCCUPATION**

Before final completion the new drainage system will also be inspected to ensure that all debris has been removed, in addition to being jetted and cleaned. As part of this the attenuation basin will be dredged and the sediments removed.

7.0 SUMMARY

With good practice and the measures outlined in **Section 5.0** and **6.0** above, the risk of sedimentation and pollution to the surface water ditch network will be no greater than during the operational phase. Should site operatives require further details, reference should be made to CIRIA C532 Control of Water Pollution from Construction Sites⁽⁴⁾, and C768 Guidance on the Construction of SuDS⁽⁵⁾. Frog Environmental's Silt Control Toolbox Tool⁽⁶⁾ has been included in **Appendix A** to provide further details on silt management.



8.0 **REFERENCES**

A variety of public, published, and site-specific information sources have been consulted in the compilation of this report, a list of these sources can be found below.

- 1. PDC Engineering (2022) Flood Risk Assessment & Surface Water Drainage Strategy.
- 2. Google Maps (2024) Google Maps.
- 3. Met Office website (2024) Weather Warnings Guide.
- 4. CIRIA (2001) Control of Water Pollution from Construction Sites. CIRIA C532.
- 5. CIRIA (2017) Guidance on the Construction of SuDS. CIRIA C768.
- 6. Frog Environmental (2018) Silt Control Toolbox Talk (refer to Appendix A).



DRAWINGS APPENDIX

CONTENT

Drawing No. 21707/003 -Drawing No. 28100/805 -Drawing No. 28100/806 -

- Topographical Survey Updated Survey Oct 2021
- Proposed Site Plan Showing Schematic Drainage Layout
- Surface Water Drainage Details







Scale 1:25

Note: Refer to Typical Manhole Detail for details of manhole construction

All pipes entering or leaving manhole shall have a flexible joint within 600mm of the inside face of the manhole. The next pipe shall be a short rocker pipe with length as shown in the table

below			
Dia of largest pipe in MH (mm	ı)	Int. Dia. of MH (mm)	
Less than 375 375 to 700 750 to 900		1200 1500 1800	
Pipe Dia		Rocker Pipe Length	
150-600 675-750 825 and over		600mm 1000mm 1250mm	
	•		, ,

Typical Manhole Detail (MH) - Plan Scale 1:25

Sieve size (mm)	Percent passing %		
	Coarse aggregate 4 - 40mm (4/40) (BS 7533-13:2009)	Coarse aggregate 4 - 20mm (4/20) (BS 7533-13:2009)	
80	100	-	
63	98-100	-	
40	90-99	100	
31.5	-	98-100	
20	25-70	90-99	
10	-	25-70	
4	0-15	0-15	
2	0-5	0-5	
1	-	-	
Filter medium to be made up of; • clay and silt (<0.063mm) <5% • fine sand (0.063 - 0.2mm) <20% • medium sand (0.2 - 0.6mm) <35% to 65% • coarse sand (0.60 - 2.0mm) <50% to 60%			

fine gravel (2.0 - 6.0mm) <10%

Filter Drain Detail Scale 1:20

Note General:

1. This document has been created in accordance with Plandescil Ltd. terms & conditions along with the scope of works provided by the client to Plandescil Ltd. Any use of this document other than for its original purpose is prohibited, Plandescil Ltd. accepts no liability for any third party use of this document.

2. Plandescil Ltd. is to be informed immediately of any alterations/deviations identified on-site from the information shown on the engineering drawings. 3. Plandescil Ltd. to be immediately notified of any suspected omissions or

discrepancies. 4. All proprietary materials to be fixed strictly in accordance with

- manufacturer's recommendations using materials approved by the manufacturer
- 5. Inspections by the Local Authority, shall be arranged by the contractor to suit their program.
- 6. Until technical approval has been obtained from the relevant authorities it should be understood that all drawings issued are preliminary and not for construction. Should the contractor start site work prior to approval being given, it is entirely at their own risk.

Note Drainage:

- 1. Unless noted otherwise all pipework shall be constructed from PVC-U to BS EN 1401-1 bedded and backfilled as per the manufacturer's recommendations and the above listed publications.
- 2. All private drainage shall be in accordance with BS EN 752 and relevant sections of Approved Document H of the Building Regulations. The Contractor's attention is drawn to Diagrams 7 and 8 of 'The Building Regulations Approved Document H' showing details of drains laid below and near to buildings.
- 3. Generally, pipes to have granular bed & surround in accordance with manufacturers recommendations, ensuring adequate protection with respect to depth and location.
- 4. All foul water pipes to be 100mm ø, and laid no flatter than 1:40 or 1:80 where at least 1 WC is connected, unless stated otherwise. All surface water pipes to be 150mm ø, and laid no flatter than 1:150 unless stated otherwise.
- 5. SVP's, stub stacks & RWP's are shown indicatively only. Refer to architect's drawings for accurate locations. 6. Rainwater downpipes that do not connect directly to an access point shall
- be fitted with a rodding access. 7. All cover levels shown on this drawing are approximate based on survey levels. Exact levels of new covers and frames to be determined on-site to
- match levels and profiles of finished surfaces. 8. All covers, gratings and frames to chambers, gullies, channels etc. shall be
- of the correct load class to suit their location: • Load Class D400 car parking not accessible to HGV.
- Load Class E600 areas subject to HGV loading.

• Gratings in pedestrian areas to be designed for pedestrian use (i.e. heel safe). 18. All pre-cast and in-situ concrete and mortars used in the construction of drains and sewers shall be made from sulphate resisting cement.

- 19. All levels and dimensions should be checked on-site by contractors and relevant sub-contractors. 20.Existing services & sewers indicated on this and any other related drawings are shown indicatively. All existing public utility services and private apparatus are not necessarily shown on the drawings. The contractor shall liaise with the utility provider to determine precise location of existing services. Existing services should be marked out on-site prior to any
- excavation works. All utility company guidelines, and health & safety procedures must be strictly followed. 21.Prior to commencement of the works all drainage outfall points, whether existing sewer, drain, or watercourse, shall be verified on-site by the Contractor. If the outfall point is found to be higher or significantly lower than shown on the drawings then Plandescil Ltd. shall be notified immediately. Prior to commencement of construction on-site the Contractor shall install all off-site drainage connections, or satisfy themselves that there are no obstructions or other reasons why the drainage connections cannot be made.

APPENDIX A

CONTENT

Silt Control Toolbox Talk

Managing silt does not need to be hard work or expensive.

This toolbox talk will help you manage silt before it becomes a problem.

 Sit is the number one pollutant from construction sites.

 Regulation is getting tougher and the fines are getting bigger.

Why do we need to control silt?

- Silt has the potential to harm aquatic plants and animals, smother important habitat, reduce water quality and transport other contaminants such as oil and chemicals.
- Silt pollution can also impact abstractions, affecting drinking water supplies, irrigation, aquaculture and angling as well as damaging the general recreational and amenity value of water.
- It is an offence to allow polluting materials to drain into a watercourse. Silt pollution can result in prosecution and with it the potential for large financial penalties and reputational damage.

What are the sources of silt?

There are a number of high-risk areas on site that are prone to silt mobilisation during rainfall:

- roads and parking areas
- exposed soil
- dewatering muddy excavations
- plant and wheel washing facilities
- vehicles tracking across rivers, streams and ditches
- material storage areas and stockpiles
- uncontrolled concrete wash waters

How does silt pollution escape from site?

Once sediments are mobilised • they will travel the path of least resistance, often resulting in muddy water leaving site.

Key pathways include:

- ditches and streams
- overland flow
- land drains
- surface water and foul drains
- bore holes

What are the benefits of silt control?

- reduce the risk of delays and the associated cost
- save space and land acquisition costs by managing settlement ponds
- improve relationships with the client, regulator and neighbours
- reduce complaints, disputes and the potential for compensation claims
- enable quicker, cheaper and better land reinstatement
- maintain and improve reputation within the industry

<u>Remember</u>: it's easier and cheaper to prevent pollution than to have to respond to and control a pollution event

The following site checklist can be used as a guide to help plan silt management:

<u>DO:</u>

Before works start:

Be aware of all rivers, streams, ditches and drains and where they flow to, plan to protect these from mobilised silt

How much rainfall can reasonably be expected? Ensure any settlement ponds are sized appropriately

Check what silt control interventions are needed e.g. filtration devices, pipe reactors, silt capture channels. Seek advice early if unsure

Plan to divert clean water away from exposed soils and working areas i.e. minimise silt creation

✓ Plan ahead for disposal for silt and include this in the Site Waste Management Plan

Minimise the extent and duration of soil disturbance, establish new vegetation on bare ground as soon as possible

Retain a vegetated strip (buffer zone) adjacent to rivers, streams and ditches

During construction:

As the site develops check if the silt control measures are still adequate

Report to construction manager any pollution or evidence of discoloured water leaving site

Prevent contaminated water from entering watercourses untreated

Roads and drains on site should be kept free of sediment build up.

✓ Keep site access clean and free from mud and standing water

Check site drainage and silt control interventions after rainfall events

Check silt treatment systems are working and that water being finally discharged from site is clear of silt on a daily basis

Monitor lagoons and silt traps, ensure they are working as planned

DON'T:

Don't strip land of vegetation unless it is necessary. Aim to reduce exposed soil on site

Don't store piles of excavated material within 10m of a river, stream or ditch

Don't pump muddy water to rivers, streams or ditches without treatment in place

Don't release muddy water from excavations or lagoons without appropriate controls

Don't release road-sweeper waste or concrete washout directly onto the land or into drains, use designated site-specific methods of disposal

Don't hose down roads, concrete or cement spills directly into rivers, streams, ditches or drains without controls in place

Don't wash off any tools or plant directly in rivers, streams or ditches

It is less expensive to prevent silt pollution than to receive a fine.

Even with good planning, intense downpours can lead to silt control problems. If conditions change, contact the site manager.

> for silt control advice contact: 0345 057 4040 info@frogenvironmental.co.uk www.frogenvironmental.co.uk @frogenv

Civil engineering and building

- Industrial, Commercial, Agricultural and Domestic building design
- Foundation Design and ground improvements
- Highway Engineering including Civil 3D
- Retaining walls
- Sheet Piling

- Infrastructure planning and design
- Design of sustainable drainage system (SUDS)
- Soakaway design
- Architectural design of industrial buildings
- Planning and building regulation applications

- 3D conceptual models
- Renewable Energy Civil Engineering design and project management
- Anaerobic Digestion and Waste to Energy Project design and detail

Environmental engineering

- Contaminated Land reports
- Environmental impact assessments (EIA)
- Flood Risk Assessments
- Water supply, treatment, storage and distribution
- Foul and surface water & effluent/leachate drainage design
- Drainage network modelling
- 1D & 2D flood modelling
- Hydraulic river modelling
- Flood Alleviation
- Breach & overtopping analysis
- Reservoir flood inundation modelling
- Consent to discharge applications
- o Environmental Permits
- Nutrient Neutrality

Structural engineering

- Structural calculations for Commercial, Agricultural and Domestic building design
- Structural design using steel, stainless & carbon steel, concrete, timberand masonry
- Maritime and Hydraulic structures
- Structural surveys and structural suitability surveys
- Structural failure studies
- Subsidence claims
- o 3D Finite Element Analysis
- Structural monitoring
- Structural enhancement/ remedial work
- Historic building advice
- 3D Revit & Level 2 BIM structural design & modelling

人 Surveying land and buildings

- Geomatic / topographical site surveys
- Building, Road, and Earthworks Setting out
- Engineering Setting out
- Establish precise site survey control
- 3D digital terrain modelling

- Volumetric analysis
- Site area computations
- Flood risk surveys using GPS active network
- Measured building floor plans and elevation surveys
- Land transfer plans to Land Registry requirements
- Drainage network surveys
- Assistance/Expert witness in land boundary disputes
- Deterioration monitoring
- Preparation of asset plans
- As built record surveys

PDC Engineering

Units T6 & T7, Snetterton Business Park, Harling Road, Snetterton, NR16 2JU

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PDC Engineering is a trading name of Plandescil Limited whose registered company number is 01447113 and whose registered office is Units T6 & T7, Snetterton Business Park, Harling Road, Snetterton, NR16 2JU.

Civil • Structural • Environmental • Surveying

APPENDIX B

CONTENT

Environment Manual

- 1. Introduction into Roger Skinner Ltd manufacturer of pet foods
- 2. Environmental permit condition
- 3. Odour monitoring procedure

1. Introduction into Roger Skinner Ltd manufacturer of pet foods

Roger Skinner Limited falls into scope of *Process Guidance Note 6/24(13): Statutory guidance for pet food manufacturing* as per the description of dried pet foods in clause 3.2 and the definition of *dry products* in clause 3.7 and 3.12.

The process employed at Roger Skinner Limited is simpler than many other pet food manufacturers and as such, much of Appendix 3 of *Process Guidance Note 6/24(13): Statutory guidance for pet food manufacturing* is not applicable.

Roger Skinner Ltd is a manufacturer of dry dog food kibbles (with a moisture less than 15%) which involve the use of vegetables materials and some pre-processes animal materials.

The pre-processed animal materials are coming into tote bags and labelled as Cat. 3 – Not for Human Consumption. The bulk liquids raw materials are distributed into enclosed tanks directly through the pipe into the site confined oil tank. Fugitive emissions from raw material handling and raw material storage are low intensity.

Emissions of particulate matter may arise from the processing and size reduction (grinding and milling) of dry materials. Other fugitive emissions of dust may arise from transfer of potentially dusty materials including discharge into hoppers and onto conveyors, and delivery to storage silos. A dust emission on intake area might be caused by the arrival of bulk grains on site. The dust emission is classified as low, medium, or high onto <Grain authority to tip form TC 03.5C Q01>. The offloading of the bulk grain is extracted, and maintenance records are kept by Technical Manager and engineering. In case of high dust emission, the unloading is stopped and is brought into Technical and Production Operative Manager for further actions.

Dry ingredients (inclusive of meat and fish meals) and poultry/sunflower oils are employed across all products in varying quantities and all products are cooked in the same manner, thus there are no changes in process conditions causing an increase in odour emissions. Odours emitted can vary based on the type of meals used in a recipe (meat or fish) but the variation is minimal. Due to the nature of the ingredients used, there is no adverse change based on weather conditions. Odours are only emitted during the production process as the sole emission is from the oven flue – during factory breakdown or shut-down, no odours are emitted. During periods of shutdown or breakdown, raw materials remain dormant and no adverse odours are emitted.

Fugitive emission from product handling and storage are in low intensity.

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Odours are monitored as per the requirement of the permit issued to Roger Skinner Limited, dated 27/10/2015 (appendix 1 – odour monitoring procedure) and against the hedonic scale documented on *EM001 Q1 Environmental Monitoring Point map* and on *EM001 Q2 Environmental Monitoring Records*. Any action required will be taken as detailed below.

Roger Skinner Ltd is committed to providing value added products in such a way that it minimises the impact of their activities on the environment.

In particular, Roger Skinner Ltd undertake to:

- Meet all legal requirements and regulations.
- Strive to prevent pollution to air, water and land caused by its activities.
- Continually develop and improve its environmental policies, practices, and performance.
- Implement and maintain an on-going carbon reduction programme.
- Set and review environmental performance objectives and targets.
- Provide training for all employees sufficient to meet the requirements of their responsibilities within the Environmental Management System.
- Work with its suppliers to minimise the impact of their operations on the environment through a quality purchasing policy.
- Work towards the Process Guidance Note 6/24(13)

The implementing of Statuary guidance for pet food manufacturing helps our company in the following ways:

- Boosts our image.
- Compliance to Environmental Legislations
- Improves cost control through materials and energy.
- Reduces environmental incidents which result in loss of reputation, liability etc.
- Improves image with authorities.
- Improves employee ethics.
- Improves awareness in society.

All employees are contributing to our ongoing success by:

- Switching off electrical supplies (when not required)
- Ensuring waste is segregated in accordance with our Waste handling procedure OP 04.12
- Reporting water wastage e.g. dripping taps, leaking hoses, faulty equipment e.g. spray bars
- Switching off the forklift engines when not in use.
- Having knowledge of where spill kits are located. In the event of a spillage, contact Site engineering department:
 - Oil / bulk liquids storage area
 - Plant room adjacent to workshop

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Roles and Responsibilities at Roger Skinner Ltd

The Technical Manager is responsible for the Environmental Management System is established, implemented and maintained and reports its performance.

The Technical Manager, Engineering department, Operational Director has responsibility for ensuring that contractors are made aware of procedures and requirements.

The Technical Manager is responsible for:

- Ensuring the training needs and competence (relative to the significant aspects) of all staff are met.
- Maintaining training records.

2. Environmental permit condition

Emissions

Roger Skinner Limited contains all processing operations within the factory building. Release of uncontrolled emissions is achieved using an oven flue as the sole and complete source of extraction for all odorous air. A draft response procedure was submitted to the regulator to allow the issuing of permit no. EP 200/15 dated 27/10/2015. An updated response procedure has been completed in conjunction with this document to be submitted to the regulator 13/02/2018, as per the guidance in appendix 3 of *Process Guidance Note 6/24(13): Statutory guidance for pet food manufacturing*.

No visible particulate matter is emitted from the oven flue and as such not beyond the installation boundary.

The oven flue was installed in accordance with the requirement in section 3 of the permit issued 27/10/2015 and approved by the regulator.

Good hygiene for odour control

European regulations laying down health rules as regards animal by-products and derived products not intended for human consumption, (Regulation (EC) 1069/2009 and the accompanying implementing Regulation (EC) 142/2011 apply to this sector and are enforced for reasons other than odour control.

There is a daily, weekly and cleaning schedule and a procedure which production operative have been trained to follow. The plant is mostly dry cleaned apart of the extruder where no chemicals are applied. All effluent from floor washings is drained to an effluent treatment plant.

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Usual the Food processing takes a huge amount of water, and the food industry is the largest source of water/effluent off all industrial activities. The effluent is collected on a call by a licenced company and is classified as non-hazardous.

Buildings, ventilation

Records are kept as part of the offload process of the emissions observed, the dust emission is classified as low, medium or high onto <Grain authority to tip form TC 03.5C Q01>.

The raw material delivery vehicles are unloaded inside closed doors.

The fans installed in the processing area are designed just to circulate the air inside and outside of the building without filtering the air.

Air movement exhaust fan Extruder

Air movement exhaust fan Muesli line

Ai Movement exhaust fan Muesli line

Dryer Cyclone

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There are 5 air movements exhaust fans in total and are wall mounted with attenuators fitted. The main design and function of the attenuators are to attenuate the noises in ventilation duction. The fans are not constructed with filters.

Another wall mounted fan is the dryer cyclone which is not fabricated with filters.

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The dryer waste ventilation is roof installed without filters, a few meters in height.

The cooler exhaust fan is roof fitted without filters.

The boiler exhaust fan is wall fitted without filters and duct just steam.

Processing

Loading of processing tanks at Roger Skinner Limited is largely automated with minimal human intervention, minimising spillage, and disturbance.

The process plant, extruder, drier, cooler, conveyor belts and vessels are enclosed to minimise emissions.

The plant is ventilated (by no filtered fans) to maintain an adequate negative pressure within the raw material reception and processing areas.

At Skinners Pet Foods Ltd, our process is outside the range of most areas in Appendix 3.

Due to the fact that we are a dry meal plant, factory like "changes in process conditions" do not affect an increase in odour emissions. In the event of a factory breakdown or shutdown, odour emissions cease completely because they are only emitted during the production process. Raw materials that are left dormant at this stage do not emit any odour at all due to the fact that all the raw materials are in a dry state. This is also the case where weather conditions change, as the raw materials are not adversely affected by changes in temperature be they high or low.

Wastes capable of causing odour

The disposal of certain animal by products falls under the controls of a European Regulation (EC) 1069/2009 laying down rules as regards animal by products and derived products not intended for human consumption. The food waste at Skinners' is segregated into 1X40 Yard enclosed container and is recycled by a contracted company named Warrens Group food waste recycling every 2 weeks or arranged by Skinners. The food waste collection is undertaken frequently in order to prevent accumulation and subsequent attraction of pests, also, the environment of the site is improved. The Warrens Group is recycling the Skinner's waste food to generate electricity, heat and biofertiliser.

The cardboard, plastic and tote bags are based on site and recycled by the licensed contractors <B&B Skip> every month or on call.

All general waste (canteen, office waste) is removed from the site by the housekeeper/cleaner and placed within appropriate external covered waste container. The general waste collection is arranged by Skinners and is collected by Warrens Group.

Any engineering waste (metal, broken lights, etc.) is controlled by the Engineering department and an approved contractor is contacted to remove this waste as required. The engineering metal waste is

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Engineering waste

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stored in one special container located outside the processing area and collected by Lee Smiths Scrap metals limited.

All wastewater is disposed of through the drainage system on site and is collected by M. Gaze & Co Ltd on call and is classified as non-hazardous.

Waste collection and disposal contractors are licensed and registered with the Environmental Agency. Roger Skinner Limited is using just licensed waste carrier's companies.

Roger Skinners Ltd Storage external waste disposal

Food waste 40-yard skip

Cardboard waste skip

PP sacks waste skip

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General waste compactor/container

Other bulk, loose, dry material – storage and loading and transport around site

Dusty materials are stored solely in the intake area and transferred in enclosed conveyors and augers. Once passed through the extrusion process, all dusty materials cease to be.

Dusty materials are transferred in enclosed conveyors and augers.

Monitoring provisions

Monitoring is completed in accordance with this requirement and outlined in Environment manual.

Roger Skinner Limited will inform the regulator should any abnormal emissions likely to have an effect on the local community be identified through its regular monitoring.

Extraction equipment is maintained as required by the manufacturers and records of maintenance are held by the engineering and Technical department.

Records and training

The staff whose functions could impact on air emissions from the activity has received appropriate training. Staff are trained as required to allow them to monitor emissions in accordance with the permit and records are held by Roger Skinner Limited.

Records of all monitoring are held as required by the regulator and available for examination if requested.

Best Available Techniques

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Best Available Techniques have been and will be employed as per the recommendations of the regulator upon visit to the Roger Skinner Limited manufacturing site.

Change in operation

Should any change in operation at Roger Skinner Limited be proposed that may affect the emissions of the site, the regulator will be informed in writing at least 14 days prior to regulation as per the requirement of the permit.

3. Odour monitoring procedure

Purpose & Scope

A requirement of the Environmental Permit issued to Roger Skinner Limited is the regular monitoring of odours released from the factory as per the Pollution Prevention and Control Act 1999.

This procedure is to cover all Roger Skinner Ltd site.

Responsibility:

- 1. Is the responsibility of the Technical Manager to implement and monitor this procedure.
- 2. It is the responsibility of the QA technician to ensure this procedure is followed in fully.
- 3. It is the responsibility of the production and warehouse leaders' team to supervise the raw materials offloads.

Frequency

Monitoring must take place upon weekly start up (usually Monday morning) approximately 8.30AM and 3PM daily (Monday to Friday) during production days.

Procedure

All information must be recorded on the **<EM001 Q2** - **Environmental Monitoring Records>** in association with the **<EM001 Q1** - **Environmental Monitoring Point Map>**. The map indicates the emissions monitoring points locates on the Roger Skinner Limited manufacturing site. The site was divided into 4 monitoring points.

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Exhaust serving drier

EM002 Q2 - Environmental Monitoring Records to be completed as following:

- 1. Go to Point 1 indicated on EM001 Q1 Environmental Monitoring Point Map.
- 2. Using *EM001 Q2 Environmental Monitoring Record,* document the date and time that you are conducting the monitoring.
- 3. Determine the wind direction using the indication of north on *EM001 Q1 Environmental Monitoring Point Map.*
- 4. Document the wind direction and perceived strength.
- 5. Determine current temperature and record.
- 6. Record the general weather condition (e.g. cloudy/sunny/foggy/raining).
- 7. Score the odour as per the Hedonic Tone Scale detailed on *EM001 Q2 Environmental Monitoring Record* and record.
- 8. Go to point 2 indicated on *EM001 Q1 Environmental Monitoring Point Map* and complete step 7 for this point.
- 9. Score the dust emission of the offload bay as per *EM001 Q2 Environmental Monitoring Record* and record.
- 10. Go to point 3 indicated on *EM001 Q1 Environmental Monitoring Point Map* and complete step 7 for this point.
- 11. Go to point 4 indicated on *EM001 Q1 Environmental Monitoring Point Map* and complete step 7 for this point.
- 12. Score the dust emission on point number 2 which indicate the intake area. The dust emissions are scored "0" if there is no dust emission, "1" for low dust emission, "2" for medium dust emission, "3" for high dust emission.

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Corrective actions

- If the odour at any point is graded at -1 or below, notify the Operations Director and Technical Manager immediately. Sufficient action will be decided upon at this point and may include stopping production of the current product through to examination of the flue to ensure correct performance. The action will be recorded.
- In case of high dust emission, the unloading is stopped and is brought into Technical and Production Operative Manager for further actions.
- All major incidents will be reported to the relevant regulatory authority in compliance with the appropriate procedure, as soon as is reasonably practicable. An incident report will be completed for all environment's incidents conform **Doc. Ref. EM001 Q3 Environmental Incident Report Form.** Any identified corrective action will be reviewed by the Technical Manager.

Non-conformances arise when processes are allowed to deviate from the operational limits e.g.

- Exceeding discharge consents.
- Having an oil spill whilst refilling bulk storage tanks.
- Not segregating waste properly.
- Not using licensed waste carriers.

The company carries out Internal Auditing to:

- Ensure upcoming certification compliance (e.g. BRC).
- Promote self-improvement (looking for continual improvement year on year).
- Audits are carried out at as per the audit schedule, the schedule is based on system documentation, the risks and aspects of the site (ongoing implementation)

The Management Review is carried out on site, every 2 years.

It Reviews: - Any changes required to policies, objectives, changes to procedures, non-conformances, audit results and other elements of the Integrated Management System.

Environmental Awareness – Documentation

The company operates a Document Control system, which includes:

- Policies.
- Environmental Manual Policy (EM001), located on technical Department.
- Environment Awareness training Presentation to Roger Skinner Ltd staff
- Quality Manual System (QMS 001) (ongoing implementation)

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Related procedures: - TC 03.5 Supplier approval procedure

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- OP 03.5A Intake offloading packaging's and ingredients procedure
 - TC 03.5B Receiving of bulk liquid on site procedure
- TC 03.5C receiving of bulk grain on site procedure
- OP 03.5F Transport conditions of Supply
- CL 04.11B Cleaning instructions procedure
- OP 04.12 Waste and waste disposal procedure
- OP 07.2A Visitors and Contractor controls
- ENG 04.7C OP01 Small bagging line indoor extractor
- ENG 04.7C OP02 Intake extractor maintenance inspections
- CL 04.11B OP02 Intake, Grinding and Sifter cleaning records
- CL 04.11B OP07 Small bagging line cleaning records
- QMS001 Quality Manual System (ongoing implementation)
- Forms and records:
 - Risk assessments (ongoing)
 - o Material Safety Data Sheets
 - COSHH assessments

Environmental Manual Document control:

Doc. Reference No.	Document title	lssue number	Issue date
EM001	Environmental Manual	02	17.02.2022
EM001P	Environment Awareness staff training presentation	02	17.02.2022
EM001 Q1	Environmental Monitoring Point Map	02	17.02.2022
EM001 Q2	Environmental Monitoring Records		17.02.2022
EM001 Q3	Environmental Incident Report Form	02	17.02.2022

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Amendment Log

Date	New	Reason	Training	Issued	Authorised
	Issue		Required	by	by
	Number				
04.03.2020	01	New Issue	Yes	S Caluian	M Peters
17.02.2022	02	Amended the logo and 2 - Waste capable of causing odour.	Yes	S Caluian	M Peters
17.09.2023	03	Amended:	Yes	S Caluian	M Peters
		Good Hygiene for odour control			
		Storage external waste disposal			
		Buildings, ventilation			

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