

ENVIRONMENTAL MANAGEMENT PLAN (EMP)

Company	Keltbray Ltd	Contract No.	
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Revision History

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This Revision

	Print Name	Signature	Position	Issued to:
Author	Shane Grealy		Site Manager	Project Team
Checked by	A McClafferty		Director	
Approved by				

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	Shane Grealy	<i>Shane Grealy</i>	06	04	16

DOCUMENT INFORMATION

Related documents

Document Title	Owner
Construction Phase Health & Safety Plan (CPHSP)	Keltbray
Project Quality Plan (PQP)	Keltbray
Site Waste Management Plan (SWMP)	Keltbray
Prevention Incident Response Plan (PIRP)	Keltbray
Traffic Management Plan (TMP)	Keltbray
Noise, Dust and Vibration Management Plan (NDV)	Keltbray

Abbreviations	The abbreviations listed below apply to this document:
Ambient Noise	Normal background noise levels, which varies dependent on the location.
Consent (discharge)	A statutory document issued by the Environment Agency under Schedule 10 of the Water Resources Act 1991 or the Scottish Environment Protection Agency under the Control of Pollution Act 1974 to indicate any limits and conditions on the discharge of an effluent to controlled water.
PM	Project Manager
dB (A)	Decibel aura - sound pressure level that corresponds to the frequency response of the human ear.
EA	Environment Agency
EHD	Local Environmental Health Department for a Unitary Authority area.
EHO	Environmental Health Officer
EMP	Environmental Management Plan
EMS	Environmental Management System to EN ISO 14001
Environmental aspect	Element of an organisations activities or products or services that can interact with the environment
Environmental impact	Any change to the environment, whether adverse or beneficial, wholly or partially resulting from an organisations environmental aspects
SAC	Special Area for Conservation
Section 60 notice	Issued under the Control of Pollution Act 1974 to control noise pollution and nuisance. If issued the conditions must be complied with until revoked or successfully appealed against
Section 61 consent	Issued under the Control of Pollution Act 1974 to permit noise on site.
Sustainable development	“Development that meets the needs of the present without compromising the ability of future generations to meet their own needs” (from the Bruntland Report).
PC	Keltbray Ltd
LA	Camden Council

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1. SCOPE

Keltbray Limited will commence the soft strip, asbestos removal, structural demolition plus design and installation of temporary works to the retained structures located at Parker House.

This document comprises an Environmental Management Plan (EMP) written specifically for the project with the intent of providing a framework within which the environmental aspects of soft stripping and structural demolition works will be managed. It identifies and summarises particular issues relevant to the works to be undertaken on site and contains a set of procedures for each environmental issue.

The format of the Plan reflects the elements of the Environmental Management System Standard ISO 14001:2004.

Keltbray operates an Integrated Management System (IMS) detailed in the Company Quality Manual. This contains Policy Statements, organisational details and Company Procedures, which provide generic arrangements to ensure compliance with safety, quality and environmental requirements.

This Environmental Management Plan (EMP) and other project specific documents are complementary to the Company Procedures.

1.1. Programme of works

The program of the main works to take place at Parker House project will be as follows:

Operation	Start Date	Duration
Vacant possession of Parker House	June 2016	
Early Demolition works/ enabling Scaffold, initial soft strip	June 2016	
Vacant possession		
Site Establishment	As per contract Programme - T16017-DW-TP-01-REV 01	
Asbestos Removal / Soft Strip	As per contract Programme T16017-DW-TP-01-REV 01	
Temporary Works	As per contract Programme T16017-DW-TP-01-REV 01	
Structural Demolition	As per contract Programme T16017-DW-TP-01-REV 01	

Works carried out will comply and where possible go beyond compliance of the Camden council Code of Practice for Deconstruction and Construction.

For full program please refer to the Demolition Works Package program:
T16017-DW-TP-01-REV 01

2. ENVIRONMENTAL POLICY

Keltbray is committed to address environmental issues in line with the statutory requirements, company procedures. The Keltbray Environment Policy is detailed as **Appendix 1** of this document. The policy states the company commitment to comply with or exceed applicable legal requirements and other requirements, to which we subscribe; to prevent pollution; and achieve continual improvement through the development of environmental performance indicators.

The project team is committed to implementing the Keltbray Environmental Policy and any requirements from client. As part of this commitment, the Keltbray Environment Policy Statement will be communicated to interested parties such as Sub Contractors, Clients and Local Authorities including Keltbray staff, and posted on Environmental, Health and Safety Notice Boards

Responsibility for developing Environmental Policy is by the HSEQ department who have the competence to advice on environmental issues.

The EMP will allow specific local arrangements for the contract, with particular reference to:

- Noise
- Waste Management (including Hazardous)
- Emissions
- Contamination of land, drains and water courses
- Environmental Management System
- Dust
- Other Interested Parties; e.g. Heritage, Environment Agency, Local Authority Environmental Health Officers, The Royal Society for the Protection of Birds, and DEFRA
- Site Lighting
- Leakage/Spillage control
- Exhaust Fumes

This plan will act as the framework for the Environmental Management system at the site being supplemented by Method Statements and Task Briefing Sheets. All contractors involved in the project will be required to provide information that will demonstrate how they will manage environmental matters.

Methods of work will be employed that prevent and or reduce pollution to the local surroundings, in particular for:

- Local Watercourses
- Drainage Systems
- Land
- Noise and Vibration
- Waste Management
- Spillage/Leakage
- Light Pollution

Throughout the plan reference will be made to the relevant Keltbray procedures that comprise the Keltbray Integrated Management System.

3. PLANNING

3.1. Register of Environmental Aspects and Impacts

Environmental Aspects and Impacts are identified and included in this project Environment Plan prior to the start of works.

Keltbray will actively seek details of environmental assessments carried out from the client's representative and the pre construction information, if none are provided we shall take account of information on specific project environmental risks

The significance of an aspect will be determined through the assessment of key drivers including legal requirements; level of risk to the environment; level of risk to the business.

Where any residual risks are judged to be significant the Project Team, headed by Project manager shall ensure that there are emergency plans in place that define the action to be taken and appoint the person responsible for doing so. Environmental impacts and aspects for this phase of works are shown on Table 1.1

2	All Site Activity	CO2	Energy use on site (Plant and Lighting)	CO2 emissions leading to climate change, and air pollution	Y	<p>Temporary electrics on the contract spec. to include energy efficient features and ensure bespoke switching controls to avoid lighting/heating areas unnecessarily;</p> <p>Signage, Toolbox talks and site induction to encourage switching off appliances.</p> <p>Monitor CO2 emissions based on diesel consumption, display performance in high profile location (BREEAM requirement) and display information alongside to reinforce good practice in reducing emissions;</p> <p>Regular maintenance/servicing of plant;</p>	<p>Temporary electrics standard scope of works</p> <p>Toolbox talk on climate change</p> <p>CO2 monitoring database</p>	<p>Keltbray Site Manager</p> <p>Site Manager / Environment Co-ordinator</p> <p>Nominated Supervisor</p>
3	Site Establishment	Nuisance	Transport/ Vehicles to/from site	Air pollution	Y	<p>Switch off engines to reduce air pollution communicated by signage</p> <p>Implement Traffic Management Plan identifying routes / times /restrictions - based on local circumstances (e.g. schools, and advice from local authority and emergency services)</p> <p>Communicate traffic management plan to suppliers and sub-contractors as part of Environmental Plan</p>	<p>Health and Safety Climate Change Levy</p> <p>Climate Change Levy New Roads and Street works Act 1991 (if involved in work on public highway)</p>	<p>Site Manager</p> <p>Site Banksman</p> <p>Site Manager</p>

4	All Site Activity	CO2, Noise, Air Pollution	Vehicle use - deliveries	CO2 emissions leading to climate change, local traffic congestion	Y	Vehicles to have full loads; Consolidate orders to ensure fewer deliveries; Consolidate orders to ensure fewer deliveries;		Site Banksman Site Supervisor
5	Site Establishment	WATER	Water: Foul Water and Sewage discharges	Contamination of existing land, possible contamination of watercourse s through surface water drains. Contamination of rivers.	Y	Storage to be in marked containers, in good condition, bunded and/or on drip trays/plant nappies, well away from drains (10m+). All fill pipes, draw pipes and sight gauges to be enclosed within the bund. Tank Vent pipes should be directed down into the bund. Bunds should be 110% of volume of single drums or 25% of total volume of multiple drums. Drip trays or plant nappies to be used when transferring liquids	Water Resources Act 1991 Control of Pollution (Oil Storage) (England) Regulations 2001	Site Manager
6	All Site Activity	WATER	Storage and fuelling	Risks of spillage, ground contamination and run-off into water systems	Y	Spill kits available at appropriate locations Refuelling of bowsers and/or storage tanks on site will be supervised at all times. Refuelling point min 15m away from the open drainages Bunded hazardous waste bin for spill kits from spillages and for drip tray contents Staff trained in correct procedures (Toolbox talks/induction and	Water Resources Act 1991 Water Industry Act 1991 Control of Pollution (oil storage) regulations	Site Banksman

						<p>supervisor reinforcement)</p> <p>Emergency response plan covering spillages, communicated to relevant staff.</p> <p>Interceptors on drains Water efficient specification for site accommodation, including the following features:</p> <ul style="list-style-type: none"> • water flow restrictors if background water pressure is above 2 bar, • push taps, spray taps, • Cisterns 6l maximum size. <p>Consider sanitary waterless urinals or presence sensors on urinals to avoid unnecessary flushing</p> <p>Staff trained to report leaks reinforce with appropriate signage</p>		
7	Site Establishment	WATER	Water demand at Site Accommodation	Pressure on existing supply, low flow - depletion of water resources	Y	Sensible use of water for washing cups etc. - mention at Environment Launch staff signage in kitchens	Water Resources Act 1991 Water Industry Act 1991	Site Manager Environment Co-ordinator

8	All Site Activity	WATER	Water demand on site - from mixing concrete, concrete wash out, damping down, wheel washing	Pressure on existing supply, low flow - depletion of water resources	Y	<p>Ensure water hoses kept out of vehicle paths to avoid breakage & leaks Hoses to be trigger hoses</p> <p>Jet washers to be used for vehicle wheel washing instead of hoses.</p> <p>Smart valve on water supply to site to control timings of supply and automatically detect big leaks</p> <p>Check valves and water points regularly Staff trained to report and repair leaks – reinforce with appropriate signage</p>	Control of Pollution (oil storage) regulations	Site Manager
9	All Site Activity	WASTE	Waste production	Environmental (and cost) impacts of waste management landfill, transport, recycling processes and their impacts	Y	<p>See SITE WASTE MANAGEMENT PLAN</p> <p>Emphasis on waste hierarchy to prevent, reduce re-use, re-cycle and dispose waste from site</p>	<p>Environmental Protection Act 1990 Part II –</p> <p>Environmental Protection (Duty of Care) Regulations (Registration of Carriers & Seizure of Vehicles) Regulations 1991</p> <p>Waste (England & Wales) Regulations 2011</p>	See Site Waste Management Plan (Roles and responsibilities)

10	All Site Activity	WASTE	Hazardous Waste: Storage and disposal.	Increased landfill requirements and loss of landfill space; contamination of land and water	Y	<p>See SITE WASTE MANAGEMENT PLAN Prepare Dedicated Site Waste Management Plan</p> <p>Identify waste and approved hazardous waste disposal contractor;</p> <p>Gain a copy of the operator's licence to handle hazardous waste; Maintain Hazardous Waste Log</p>	<p>Environmental Protection Act 1990 Part II –</p> <p>Environmental Protection (Duty of Care) Regulations 1991 Controlled Waste (Registration of Carriers & Seizure of Vehicles) Regulations 1991 -</p> <p>Environmental Permitting (England and Wales) Regulations 2010 & 2011 Amendments</p>	See Site Waste Management Plan
11	All Site	AIR / DUST	Dust (General)	Disturbance of public (and particularly nearby neighbours such as school, shop and residents). interference land wildlife and ecology.	Y	<p>Visual monitoring of dust levels on site and from transport leaving site. Damp down when required. Use sheets on skips likely to cause dust.</p> <p>Monitor debris on local carriageways and maintain with road sweep as appropriate; Communicate good practice to site operatives (induction, Toolbox Talks and Daily Activity Briefings as needed)</p> <p>Consider temporary screening, as well as dust suppression, if appropriate.</p> <p>Dust inspections to be conducted as a minimum once daily and recorded Dust control measures as per Project Noise & Dust Minimisation Plan</p>	<p>Climate Change Act 2008</p> <p>Environmental Protection (Controls on Ozone Depleting Substances) Regulations 2011</p>	Site Manager

12	Groundwork, Substructure, Piling	CONTAMINATED LAND	Potential disturbance of Existing contaminated land.	Variety of possible health and ecological impacts from spread of contamination	Y	<p>It is likely that parts of the ground at the site are contaminated; however, ground disturbance is currently limited to removal of foundations and as such should not result in removal of contaminated ground.</p> <p>Whenever pre-information of possible contamination is provided, ensure land is characterised as thoroughly as necessary in advance, through professional geotechnical report, with recommendations on further action. (City & Guilds, Ref:J09260, June 2010) Keep watching brief for contaminated soil.</p>	Environmental Protection Act 1990 Environment Act 1995, Contaminated Land Regulations 2006, Control of pesticide Regulations 1986, Wildlife and Countryside Act 1981, Hazardous Waste Regulations 2005	Client/Keltbray Site Manager
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13	All Site Activity	NOISE	Noise-producing activities	Disturbance of public (and particularly nearby neighbours) leading to statutory nuisance.	Y	<p>Design out noise attenuation measures as far as possible (particularly during demolition), avoid percussive techniques if alternatives are available</p> <p>Use tight fitting, sealed acoustic enclosures on noisy equipment when possible (e.g. hoods and doors on generators, jackets on pneumatic drills)</p> <p>Arrange main electricity supply as early as possible to avoid generator use.</p> <p>Maximise efficiency of deliveries by arranging full loads and where possible at off peak times</p> <p>Co-ordinate deliveries to minimise waiting Times</p> <p>Instruct that engines to be turned off while waiting</p> <p>Good maintenance of plant and vehicles</p> <p>Operations to be in accordance with the Section 60/61 an as per agreed working hours with LBI</p> <p>For necessary works to be carried outside agreed hours, optimise sequencing to minimise duration, seek dispensation or variation from the Local Authority and inform neighbours as early as possible.</p>	<p>Environmental Protection Act 1990 Part III - Control of Pollution Act</p> <p>Clean Neighbourhoods and Environment Act 2005</p> <p>Environmental Noise (England) Regulations 2006 SI 2238</p> <p>Environmental Noise (England) (Amendment) Regulations 2009 SI 1610</p> <p>Sections 60/61 or 80/81 - TBT Noise and Vibration</p>	Site Manager
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14	All Site Activity	TRAFFIC		Dust / dirt deposited by transportation vehicles and plant travelling to/from site or around site perimeter to alternative access points	Y	<p>Visual inspection of lorries by banksman prior to leaving site to ensure that vehicles will not leave mud on the public highways.</p> <p>Plan site layout to minimise site traffic travelling outside of site boundary and minimise movement not on hard standing.</p> <p>Cover skips/lorry loads which could cause deposits or dust</p>	<p>New Roads and Street Works Act 1991 (if involved in works on public highway)</p> <p>NEW Road Vehicles (Construction and Use) (Amendment) Regulations 2010 SI 312</p>	Site Manager Site
15	All Site Activity	LIGHT, CO2	Light emitting from temporary site lighting systems.	Disturbance of public and wildlife. Stress and loss of sleep. CO2 emissions	Y	<p>Minimise lighting to that required for security and safety, and maximise other aspects of security to minimise need for lighting</p> <p>Consider location /fit light shields if needed</p> <p>Switching and timer controls to be specified</p> <p>Lighting to be focussed downwards/ inwards to minimise impact on residents</p> <p>Specify for energy efficient lighting</p>	<p>Environmental Protection Act 1990 Part III - Control of Pollution Act Sections 60/61</p> <p>BS7909:2011 TEMPORARY ELECTRICAL SYSTEMS</p>	Keltbray/ Others

16	All Site Activity	CONTAMINATED LAND	Disposal of ground water.	Silt in Sewage system. Health and ecological risks from airborne exposure, contamination of watercourse	Y	<p>Groundwater issues not anticipated as there are no excavations within the scope of works.</p> <p>In the event that excavations are included within the scope of works and the groundwater is encountered:</p> <p>Obtain consent to discharge. Dispose of water in accordance with consent. Use sedimentation tank if required.</p> <p>Encapsulate area and contain groundwater for remediation/special disposal if contaminated.</p> <p>Restrict access until remediated if contaminated.</p> <p>Monitor water quality for compliance with discharge consent</p>	<p>Environmental Protection Act Part IIA</p> <p>The Contaminated Land (England) (Amendment) Regulations 2012</p> <p>TBT Contaminated Land</p>	Site Manager
18	General	HERITAGE		Damage to built heritage	N	Any heritage finds that might be of heritage value will be reported to the Site Manager who will then advise the Project Manager and seek further instruction from a qualified specialist.		<i>Site Manager</i>
19	General	ARCHAEOLOGY		<i>Damage to archaeological resources</i>	Y	No archaeological issues on site for the works to be carried out under the scope of this document		<i>Site Manager</i>

20	All	Training/communication to Ensure environmental good practice and requirements are integral parts of all project activity (by management, staff, operatives, sub-contractors)	All	All	Y	Environment Plan Management of materials Project meeting's agenda item Sub-contract meeting's agenda item Toolbox talks Site induction Management inspections, including those for monthly reporting of progress and priorities to head office 6-monthly audits and continuous support from head office environment team	This document	Environment Co-ordinator Head office SHE team
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3.2. Environment Legislation, Regulation and Other Requirements

A register of Environmental Legislation is maintained by Keltbray SHEQ department, and is available to project teams, this includes:

- *Environmental Protection (Duty of Care) Regulations 1991*
- *Hazardous Waste (England and Wales) Regulations 2005*
- *The Contaminated Land (England) (Amendment) Regulations 2012*
- *Environmental Protection Act 1990*
- *Control of Pollution Act 1974 (COPA)*
- *Cleaner Neighbourhoods and Environment Act 2005*
- *The Control of Substances Hazardous to Health Regulations 2002 (COSHH)*
- *Control of Asbestos at Work Regulation 2012*
- *Environment Act 1995*
- *The Conservation of Habitats and Species Regulations 2010 (replaces Conservation (Natural Habitats etc.) Regs 1994)*
- *The Conservation of Habitats and Species (Amendment) Regulations 2011*
- *Noise and Statutory Nuisance Act 1993*
- *The Groundwater (England and Wales) Regulations 2009*
- *The Water Resources Act 1991 as principally amended by the Water Act 2003*

All works will be conducted in compliance with the requirements of applicable environmental law and shall pay particular regard to the Control of Pollution Act (COPA) 1974, the Environmental Protection Act 1990; the Water Resources Act 1991 and the Environmental Act 1995.

Keltbray will also comply at all times with any other mandatory requirements such as those specified by relevant local planning, highways and environment health authorities, or the relevant statutory agency. Keltbray will specifically comply and where possible go beyond compliance of the City of London's Code of Practice for Deconstruction and Construction Sites (May 2013) for all works at the 60-70 St Mary Axe project.

3.3. Objectives, Targets and Management Programme

As part of the overall management of the project, Keltbray will set targets and objectives employing environmental good practice to minimise effects on the natural environment.

Keltbray aim to achieve these environmental objectives, inclusive of those on Waste, Noise, Dust, Vibration and Spillage, through commitment to:

- *Compliance with the relevant legislation*
- *Establishing and implementing procedures to achieve those objectives*
- *On-going monitoring and review of progress*
- *Continuous improvement in Environmental performance*

The following objectives and targets have been identified for 60-70 St Mary Axe project:

Aspect (Hazard)	Impact (Risk)	Objective/Target	How Will This Be Achieved?
Nuisance-Noise. Noise travels further at night.	Nuisance to public.	<p>Ensure formal dialogue with Local Authority in place should a Section 61/60 agreement be required</p> <p>Nuisance letter/liaison distributed in good time</p> <p>Keep unsocial hours working and noise levels to a minimum applying BPM.</p>	<p>Identify residential/business areas susceptible to noise</p> <p>Nuisance notification letter requirement/content agreed with client early in scheme</p> <p>Liaison with Local Authority</p> <p>Liaison with other contractors as required</p> <p>Scaffold to relevant elevations, non-percussive methods used in sensitive areas</p>
Oil and fuel spills – Leakage.	Pollution of watercourse, drain, etc.	<p>No oil spills</p> <p>No fuel spills</p> <p>No leakage of contaminants</p> <p>No environmental harm</p>	<p>Identify environmental receptors (e.g. watercourses, springs, drains, etc.) and protect where applicable</p> <p>Fuelling operations at designated fuelling points using drip trays/Plant nappies</p> <p>Bunded Generators</p> <p>Suitable spill kits and absorption materials available wherever risk present</p> <p>Minimal storage of fuels, oils etc.</p> <p>Preventative maintenance and machine checks before start of each shift</p> <p>Suitable Emergency response in place (via Keltbray On Call Manager)</p>
Spoil from construction-contaminated waste (Controlled Disposal)	Minimise to limit waste of resource (e.g. landfill) and pollution.	<p>Safe removal of construction waste from site</p> <p>Reuse or recycle where possible</p> <p>Minimise dust</p>	<p>Use of Hazardous Waste Contractors for identified hazardous and/or contaminated waste</p> <p>Recycling for non-hazardous spoil</p> <p>Designated storage area while awaiting disposal</p> <p>Minimise dust by covering during disposal/transport</p>

Aspect (Hazard)	Impact (Risk)	Objective/Target	How Will This Be Achieved?
General construction Waste (Controlled Disposal)	Minimise to limit waste of resource (e.g. landfill) and pollution.	<p>Minimise waste produced</p> <p>Safe removal of construction waste from site</p> <p>Achieve at least 95% reuse/recycle of non contaminated waste</p> <p>All sites in clear/tidy conditions by end of each shift</p> <p>All waste stored in correct skips</p> <p>Minimise dust during demolition</p>	<p>Induction Briefings to all staff</p> <p>Implement waste hierarchy</p> <p>Suitable Waste Skips at Site of Work</p> <p>Selection of appropriate site waste contractor to achieve recycling target</p> <p>Minimise dust by covering during disposal/transport</p> <p>Suppress dust by source using water hoses</p>
Releases of Litter or wastes (Uncontrolled)	Materials from construction can spread in windy conditions.	<p>All sites cleared at end of each shift</p> <p>All waste stored in correct skips</p>	<p>Induction Briefings to all staff</p> <p>Supervisory staff site walkthroughs at the end of each shift. Prompt corrective action taken.</p> <p>Suitable secured waste skips onsite. Covered where risk wind dispersal</p>
Exhaust emissions	<p>Nuisance to public</p> <p>Air pollution</p>	<p>Minimise exhaust emissions</p> <p>Minimise potential nuisance to Members of the public and local residents, businesses</p> <p>Engineering Acceptance Certificated</p> <p>Vehicle Acceptance Body Certified</p>	<p>Induction Briefings to all staff, manage deliveries to keep it to a minimum.</p> <p>Inspection and Monitoring on site</p> <p>No Idling, Policy for the project</p> <p>Machines/Plant switched off when not in use</p>
Site lighting	<p>Nuisance to public.</p> <p>Potentially affect safe operational working of the infrastructure.</p>	<p>Minimise potential nuisance to members of the public and local residents, businesses</p> <p>No operational issues reported</p>	<p>Suitable lighting for the site of work</p> <p>Maximise dayshift working where possible</p> <p>Ensure angle of lighting is facing worksite and shrouded where required</p>
Disposal of (Hazardous Waste)	<p>Hazardous waste. Health risk.</p> <p>Pollution of Land.</p>	<p>Minimise risk to staff and other contractors</p> <p>Minimise risk to Members of the public</p> <p>Minimise risk to infrastructure and environment</p>	<p>Store in suitable containers on site</p> <p>Licensed Hazardous Waste Contractor</p> <p>Waste Transfer Notes issued</p>

This Environmental Management Plan will be briefed in person to relevant Project Staff and subcontractors by the Project Manager. The objectives and Targets are highlighted as part of the briefing. Objectives and targets are identified to site operatives through Project Induction and Environmental Toolbox Talks.

The above Objectives/Targets will be monitored as part of the project SHEQ monthly meetings.

3.4. Management Structure and Responsibility

Project environmental management responsibilities are detailed below:

Duty	Duty Holder
Overall Responsibility for Environmental Issues	Keltbray Project Manager (PM)
Site Environment co-ordinator	Keltbray Project Manager (PM)
Environmental Management Guidance and Advice	Keltbray SHE Advisor (SHEQ)

Key project environmental management activities

Duty	Responsibility	
	Action	Review
Arrange for Project Specific EMP to be compiled prior to project start	PM	Client
Approve Project Specific EMP for issue & distribute	PM	SHEQ
On-going review and update of EMP	PM	SHEQ
Ensure risk assessments, Method statements and Task Briefing Sheets are prepared and communicated to whoever needs the information	PM	SHEQ
Identify training needs for site personnel	PM	SHEQ
Ensure induction training has been undertaken	PM	-
Ensure Environmental inspections/audits are carried out	SHEQ	-
Notify Statutory Reporting Point and Client of environmental incidents on site and of any Environment Agency activity on site	PM	SHEQ
Identify environmental hazards on site	SHEQ	PM
Method statements, Task Briefing Sheets and risk assessments to include specific environmental control measures as appropriate	PM	SHEQ
Health and Safety File	PM	SHEQ

Key: PM: Keltbray Project Manager; SHEQ: Keltbray Safety Quality & Environmental Advisor.

An Organisation Chart for this project is attached as Appendix 3 of this plan.

A general organisation structure (and responsibilities) for a project is detailed as follows:

3.4.1. Project Manager

- *Responsible for the implementing, directing and co-ordinating the agreement*
- *Liaise with, and co-ordinate Keltbray project team*
- *Lead the periodic review of the Environmental Management Plan*
- *Manage the collation of information for the Health and Safety File Safety File that is related to EMP*
- *Manage the appointment of suitably trained and qualified staff*
- *Consider environmental aspects and Impacts during safety tours*
- *Chair Project Meetings that will include an agenda item of environmental issues*
- *Agree methodology for environmental issues*

- *Co-ordinate the planning of the works*
- *Prepare progress reports/reviews regarding environmental compliance on site*
- *Monitor the compliance of the contract with Keltbray/Client environmental requirements*
- *Ensure that any environmental accidents, incidents and near misses are reported and investigated in line with Keltbray procedures.*
- *Identify environmental aspects and impacts during survey activities*
- *Ensure controls for environmental aspects and impacts are detailed in Method Statements and Task Briefing Sheets*
- *Identify environmental toolbox talks to be delivered ahead of relevant activities*
- *Manage the site(s), via Site Manager, in accordance with Company/Client Environmental Policies, relevant legislation and good practice.*
- *Ensure that site teams are competent to identify, assess and control environmental impacts of the project.*

3.4.2. Safety, Health, Quality, & Environment Advisor

- *Review the Environmental Plan, as well as providing guidance on content.*
- *Review and monitor compliance with the Environmental Plan.*
- *Offer ongoing guidance to the project team in relation to Environmental issues.*
- *Carry out duties as specified in Contract Requirements for the environment.*
- *Provide information and advice service to all Managers and Contractors on environmental issues.*
- *Provide updates on any legislative changes.*

4. Competence, Training and Awareness

4.1. Induction training

The Induction briefing will cover environmental issues. All persons receiving the induction briefing will be required to sign a register. A copy of the Site Rules and Induction Briefing will be available on the site notice board.

This EMP will also be available on site and a copy issued to any subcontractors prior to commencement on site.

The Project Manager will ensure that all employees are in possession of or have access to the relevant publications or appropriate extracts relating to environmentally sound performance of their particular tasks. They shall also ensure that their staffs understand the requirements of new documentation in relation to their own duties.

Any project specific environmental training identified will be subject to the company training and competency procedures.

4.2. Awareness

A site-specific environmental briefing will be carried out as determined by the environmental risk assessments by the Site Supervisor to all Keltbray personnel, subcontractors and visitors, and will be recorded.

In addition to this plan being available to contract staff, specific information will be communicated through the following means:

- Briefings by managers/supervisors and when necessary representatives from other departments
- Alerts
- Environmental Tool Box Talks

- Keltbray Briefs (monthly Keltbray Bulletins & Briefs)

4.3. Toolbox talks

Toolbox talks are given by the Project Manager/Supervisor to company operatives on a regular basis and will cover environmental issues when these are relevant to the work in progress, e.g. waste management, noise prevention, spillage prevention and other environmental subjects as described below.

4.4. Visitors training

Visitors to site will be directed to the Site Manager/Supervisor and required to sign the visitors book on arrival and when leaving. Visitors will be accompanied a Keltbray representative at all times and be briefed on any relevant environmental issues i.e. noisy hours, listed buildings.

5. Communication

5.1. Internal Communication

Copies of the company Environmental Policy Statement will be displayed on the Site Office Notice Board.

All staff, including sub-contractors will be effectively briefed on their environmental responsibilities. This will be carried out during the induction session and will be supplemented using Task Specific Method Statements and Task Briefing Sheets.

Everyone involved in the project is required to report any issues of environmental concern immediately when they become apparent.

Personnel shall be adequately briefed in terms of their environmental responsibilities to enable the requirements of this plan to be complied with.

5.2. External Communication

During the duration of the project, external communications with Members of the Public, Local Authorities, Landowners, Residential and Business Premises Owners may take place due to certain aspects and key elements of the project. Such communications will be carried out in partnership with representatives PC as required.

Any works that are likely to be carried out beside or close to Residential or Business Premises will be carried out in such a way as to minimise any potential disruption to these owners.

Any environmental complaints that are made during the life of a project will be held on a Complaints Register. All complaints will be dealt with in a systemic and professional manner until a satisfactory conclusion that suits all parties is agreed.

Environmental issues will also be discussed as part of the project and client progress meetings, and (where appropriate) other involve contractors/other parties

All communication with Third Parties not associated with the Contract must only be made by authorised Company representatives.

Communication with parties involved with the Contract (e.g. the Environment Agency) must be referred to the Project Manager.

5.2.1. Specific Procedure references:

- 029 - SHEQ_PRO_029 - Internal & External Communication

6. Documentation

The following is a list of company procedures that will be utilised as part of this project:

- 041 - SHEQ_PRO_041 - Site Waste and Material Management
- 056 - SHEQ_PRO_056 - Environmental Risk Assessment

The distribution of these documents is controlled through Keltbray Integrated Management System.

6.1. Control of Documents

The following environmental documents are subject to document control as identified in the Quality Plan.

- Environmental Management Plan
- Site Waste Management Plan
- Monthly Environmental Report

Project staff shall adhere to the Keltbray Document Control System as defined in Keltbray Integrated Management System. These procedures describe the process for both document version control and distribution control.

7. Operational Control

This section details arrangements to be implemented within projects issued under the contract agreement.

- Permissions, Licenses and Consents
- Traffic Management Requirements
- Access and Egress
- Parking arrangements and restrictions on deliveries
- Positioning of site accommodation, welfare and material storage
- Emergency arrangements

7.1. Noise, Dust & Vibration Management

Keltbray will use noise mitigation measures at this project, to ensure the minimum reverse impact on the residential dwellings and leisure facilities around areas of work. These measures will include considerate positioning of plant and the use of silencers on generators where practicable.

Discussions on environmental monitoring will be initiated with client and Camden to agree the monitoring management to be undertaken.

Keltbray actively communicates with neighbours in writing, in particular to house-holds, regarding the work taking place when noise levels are expected to be significant, as it is the case on this project. A copy of letters will be sent to the appropriate Local Authority, Local Authority Environmental Health Officers and will be available for inspection.

Keltbray suppliers provide information that is used to determine the noise and vibration characteristics of the plant provided. Whenever it is anticipated that noise and vibration levels resulting from work activities will be excessive, notification to Local Authority, Local Authority Environmental Health Officers or an application for Section 60 or section 61 Agreement may be required.

A baseline Monitoring for (Noise, Dust and Vibration) will be carried out on the surrounding site elevation. Further monitoring will commence as agreed and instructed by client at this project.

Keltbray actively instigates and invests in the use of quieter machines, and the best location for static plant and equipment to minimise noise. We aim to meet with the client and Local Authority Environmental Health Officers to discuss works and means of further noise reduction in the event there is concern that noise will reach unreasonable levels.

7.1.1. Helpline

A contact list for the on-call manager and site personnel shall be produced for the project. Company vehicles and Keltbray site signage will display Company Telephone details and email address.

Andy McClafferty	Operations Director	07711888870
Shane Grealy	Site Manager	07966694581

7.2. Dust

Keltbray will take all reasonable steps to minimise any nuisance caused by dust or fumes generated by our work activities. This may include:

- Spraying water at work faces, loading operations and site access roads;
- Dampening of exposed soil and stockpiles if necessary;
- The location of stockpiles of soil and other materials away from dust-sensitive properties, taking into account prevailing wind, if necessary;
- Erecting windbreak netting around material stockpiles and vehicle loading/unloading areas, exposed excavation and material handling operations, if necessary;
- Regular inspection and cleaning of local highways and site boundaries for dust deposits;
- Loading of material into lorries/skips within designated bays/areas;
- Hoarding or fencing with wind nets around the site perimeter;
- Sheeting of lorries leaving site carrying loose material;
- No unauthorised burning of any materials on site; and
- Neighbourhood liaison if required by client and PC
- All site personnel trained in best practice for dust control by regular Environmental Toolbox talks.

7.3. Air Pollution

Keltbray will take all practicable steps to minimise the risk of air pollution. These steps include:

- No engine idling of road vehicles, small plant or generators
- Plant and equipment is serviced regularly to ensure good working order
- Delivery of materials and other equipment kept to a minimum
- Road vehicle exhaust emissions are the main source of air pollution in the UK, and the main pollutants are nitrogen dioxide (NO₂) and small particles known as PM₁₀. Of primary relevance to rail construction activities is PM₁₀, of which constructive-derived dust can contribute significantly to a worsening of local air quality conditions.
- Available mitigation includes:
 - Limiting the amount of stockpiled material on site;
 - Damping down regularly; and
 - Maintaining hoarding
- Monitoring and Recording Monthly CO₂ emission generated by site activities, waste removal and associated works.

- Dust nuisance occurs more readily during prolonged dry weather and especially in strong winds. The site management will ensure that during such weather conditions vigilance is maintained and plans are in place for dealing with these situations.

7.4. Interference with Drains and Watercourses

Works will be arranged in such a way to ensure that any interference with drains, spring and watercourse is prevented or minimised at this project. In the event of working on or near a drain, preventative and protective measures will be put in place to ensure no damage is caused and continual flow. This may include installation of a diversionary route whilst works are carried out. All such drains etc. will be put back as they were found once site works are complete or a permanent alternative is installed due to our work operations.

Any unknown drains, springs or watercourse discovered during work operations will be protected in the same way and put back 'like for like' upon completion of the works.

Existing site drainage will be utilised during demolition for evacuation of water from damping down etc, with adequate protection such as sand bag barriers and filter mesh as required. A drainage plan of the existing drainage points and routes will be obtained from the client.

7.5. Hydrology and Aquatic Courses

Keltbray will not knowingly lower the quality of any surface or ground water and the company shall comply with all relevant environmental legislation associated with the scope of works.

It is also not envisaged that 'discharges' into controlled waters will be carried out. Should consents be required, Details for discharging into controlled waters (The Water Resources Act 1991 as principally amended by the Water Act 2003 – COPA 1974) and/or discharge to sewers (Water Industry Act 1991) will be maintained.

Substances (Fuels, Oils, and Chemicals etc.) will generally be stored at the main Depot in a secured 'bunded' facility. Storage of such materials on site only be done so in accordance with the COSHH assessment, and will be kept to a minimum.

7.6. Archaeology

In the event of any discovery of archaeological remains during the life of the contract, Keltbray will inform client.

Where it is known that the presence of archaeological remains may exist on site, Keltbray shall ensure all the correct permissions and consents are in place before allowing work to commence.

7.7. Ecology

Keltbray will comply with statutory requirements in respect of the preservation of nature conservation areas and protected species. Any disturbance to such areas or species will be minimised. All appropriate licences or consents will be obtained prior to commencing works.

7.8. Site Boundaries

Provision of a 2.4m high hoarding will secure the site and to segregate members of the public from site activities. This will be agreed with Local Authority.

7.9. Lighting

Night time working is not included within the scope of the contract, consideration to local residents and businesses will be given when positioning and directing lighting. Lighting shall be suitable and sufficient whilst preventing nuisance to local people, site vehicle operations, or other transportation. Local authority guidance shall be sought where required along routes.

8. Site Waste Management Plan

Waste Management

A Site Waste Management Plan (SWMP) has been produced in line with company procedures and BRE requirements:

- The waste streams, EWC category, and quantities (in tonnes) that will be generated by the works;
- Waste Hierarchy as stated on Waste (England and Wales) Regulation 2011
- The proposed method of storage, handling and transportation of waste;
- The means of disposal and the relevant consents and licensing conditions in compliance with statutory requirements;
- The reporting and monitoring procedures.

All redundant materials will be disposed of via an appropriately licensed waste operator. All waste transfer notes will be maintained on site or at a suitable office location and will be available for inspection at all times.

A strategy will be adopted to ensure that any surplus material will be managed so far as is reasonably practicable to maximise the environmental and development benefits from surplus material.

A general waste skip will always be provided in the site compound. Additional skips for individual waste streams will also be provided to match current work activities. These skips will include:

- Wood
- Concrete
- Cable
- Metal

8.1. Waste minimisation

Keltbray is aware of its obligations under the Environmental Protection Act 1990 and Hazardous Waste (England & Wales) Regulations 2005, and will not only comply with these regulations, but will actively look at waste reduction through re-cycling and using alternatives.

The works shall be carried out in such a way that, as far as is reasonably practicable, the amount of spoil and waste to be disposed of is minimised.

The waste streams have been reviewed to identify:

- How the quantity of waste can be eliminated/minimised
- Estimated quantity of waste produced (tonnes)
- How waste should be stored/monitored

The waste hierarchy will be applied throughout the duration of the project as shown on Figure 1

Redundant equipment will be offered to the client to allow for reuse as spares where possible, or responsibly disposed of through authorised routes.

The waste hierarchy



9. Emergency Preparedness and Response

9.1. Emergency Contact Numbers & Emergency Facilities

The following Emergency Contract Numbers will be utilised for all works associated with this plan:

Name	Position	Contact Number
On Call Manager	Keltbray Project Manager	07966694581
Environment Agency	Emergency Hotline	0800 80 70 60

9.1.1. Emergency procedures

Keltbray will investigate all environmental incidents at the earliest opportunity in order to identify the basic causes. Subcontractors will report any environmental incidents immediately to the Keltbray Project Manager.

Keltbray is committed to ensuring the protection of the environment and in particular the protection of watercourses from accidental leakage of oil/diesel/brake fluid/petrol from tracked machines and road vehicles.

In the event of oil or any other spillage the following action will be taken:

Immediately advise your Supervisor or if out of hours the On Call Manager

- The exact location of the spillage
- The substance involved in the spillage
- An estimate of the quantity involved
- Details of the vehicle, plant involved
- Whether any watercourses, protected sites and/or sewers are, or are likely to be, affected

Details of how to respond to these incidents are detailed in Appendix 5 Initial Environmental Incident Response Procedure. Spill kits will be available at designated areas around site.

Additionally Keltbray will:

- Make every effort to contain the spillage with the use of spill kits or other means if available.
- Make suitable arrangements to reduce the risk of spillage at re-fuelling points e.g. drip trays, 'bunded' tanks.
- Ensure Fire Extinguishers, as applicable, will be available to reduce the risk of fire.
- If appropriate, the incident shall be reported to the Environment Agency. This will be done within 12 hours of the incident occurring.

10. CHECKING

10.1. Monitoring and Measurement

This Environmental Plan is planned to be reviewed on a maximum six monthly basis during the contract to reflect changes in statutory legislation or policies but can be amended at any time to reflect changes in the legislation, typing errors, additions, omissions and lessons learned in the event of an incident. Typical topics that are monitored and reviewed are:

- Compliance with relevant Waste Legislation.
- Interfaces with Interested/Outside Parties.
- Compliance with all relevant procedures and processes.
- Alignment of objectives with those of client and any policy changes.

Outcomes of reviews will be recorded. Where the document text is revised, the plan will require Keltbray authorisation and client acceptance.

Please refer to separate document; KBY_NDVMP_001 for the full noise, dust and vibration management plan.

Incident Reports may be generated through various means such as site inspections, project audits as well as the customer or public complaints.

Environmental Performance Indicators will be submitted in line with client and PC requirements.

10.2. Evaluation of Compliance

Regular monitoring will take place by project delivery staff during the life of the project to ensure that the surveillance plan for this contract is implemented. In addition the Safety & Quality and Environment Advisor will carry out audits/inspections as required.

Examples of topics that will be monitored and reviewed are:

- Noise & Vibration levels (based on monitoring reports and any complaints).
- Compliance with waste legislation (storage facilities, transfer notes, SWMP, etc.).
- Interface with interested parties
- Compliance with Keltbray Procedures.
- Alignment of objectives with those of PC and any policy changes.
- Compliance with all relevant environmental legislation.

10.3. Control of Records

All records pertaining to the implementation of this EMP shall be included within the Health and Safety File if required by PC.

The following records are retained as indicated and are available for audit purposes:

Record	Responsible Person
Complaints	Project Manager (Copy forwarded to SHEQ Department)
Consents, Discharge Consents, Temporary Work etc.	Project Manager
Supplier Information etc.	Procurement Manager
Non-Compliance and follow ups	Project Manager, SHEQ Department
Accident and Incidents follow up	Project Manager, SHEQ Department
Training	Resources Manager, Training & Development Department
Environmental Noise & Vibration Assessments	Project Manager, SHEQ Department
Waste Disposal Records	Project Manager
Site Waste Management Plan	Project Manager

10.4. Internal Audit

The SHEQ team will carry out internal audits in order to establish compliance with all the pertinent requirements. These may be supplemented by:

- Audits carried out by the client
- Audits of sub-contractors
- Third party or regulatory authority audits of ourselves or our subcontractors including those carried out for quality system certification purposes

Keltbray has established an internal audit programme as part of the Management System. Where appropriate, the results of these audits shall be used to correct and prevent recurrence of deficiencies, which affect the Project.

Audits will be carried out in accordance with the three main management system standards for Quality, Safety & Environment ISO 9001, ISO 14001 and OHSAS18001.

11. MANAGEMENT REVIEW

The project team will periodically review and continually improve its environmental management system, with the objective of improving its overall environmental performance.

11.1. Review of the environmental management system

During the EMP review, the Project Team shall conduct a review of the project's environmental management system and evaluate the system's continuing suitability, adequacy and effectiveness. This review will cover the environmental aspects of activities that are within the scope of the environmental management system. This review may include:

- results of internal audits and evaluations of compliance with applicable legal and other requirements;
- communication from external interested parties, including complaints,
- status of corrective and preventive actions,
- changing circumstances, including
- results of the evaluation of environmental aspects from planned or new developments,
- changes in applicable statutory legislation, procedures and other requirements.
- lessons learned from emergency situations and incidents,

Outputs from the review of the environmental management system shall include decisions on the system's suitability, adequacy and effectiveness and the identification of improvement priorities.

11.2. Continual improvement

Continual improvement is a key attribute of an effective environmental management system. This is accomplished through the achievement of environmental objectives and targets and the overall enhancement of the environmental management system or any of its components.

Where opportunities for improvement are identified, they will be evaluated to determine what actions should be taken. The actions for improvement will be planned, and changes to the environmental management system implemented in accordance with those plans.

12. REFERENCES

BS EN ISO 14001: 2004 Environmental Management Systems

Useful Regulatory Pollution Prevention Guidance notes

The table below lists the Pollution Prevention Guidance (PPG) notes that have been produced by the environmental regulators as key guidance for topics discussed within this plan. Copies of the PPG notes outlined below are available free of charge, from the environmental regulators or can be downloaded from Environment Agency website at www.environment-agency.gov.uk/ppg

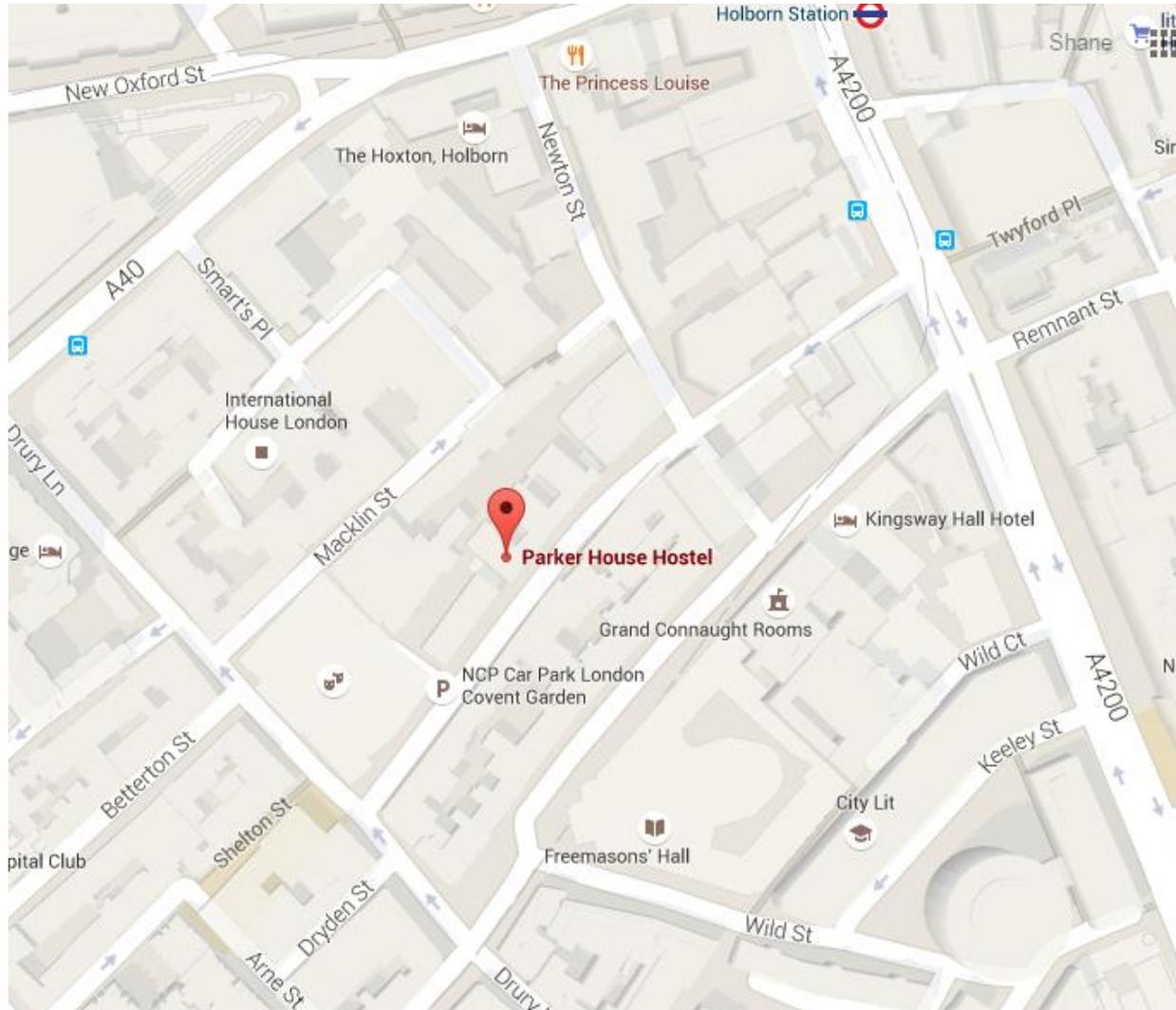
PPG No.	Title
1.	General guide to the prevention of pollution
2.	Above ground oil storage tanks
3.	Use and design of oil separators in surface water drainage systems
4.	Disposal of Sewage where no mains drainage is available
6.	Working at construction and demolition sites
7.	Refuelling facilities
8.	Safe storage and disposal of used oils
18.	The control of spillages and fire fighting run-off
21.	Pollution incident response planning
26.	Storage and handling of drums and intermediate bulk containers

----- End of document text [Appendices follow] -----

APX 1: KELTBRAY ENVIRONMENTAL POLICY

A copy of Keltbray's environmental policy is displayed on site notice board and is available on the internal shared filing system: <S:\Keltbray Management System\Group Policy Statements>

APX 2: SITE LOCATION



APX 3: SITE DRAINAGE PLAN

Existing site drainage plan will be inserted here when made available.

APX 4: SITE MANAGEMENT ORGANISATIONAL CHART

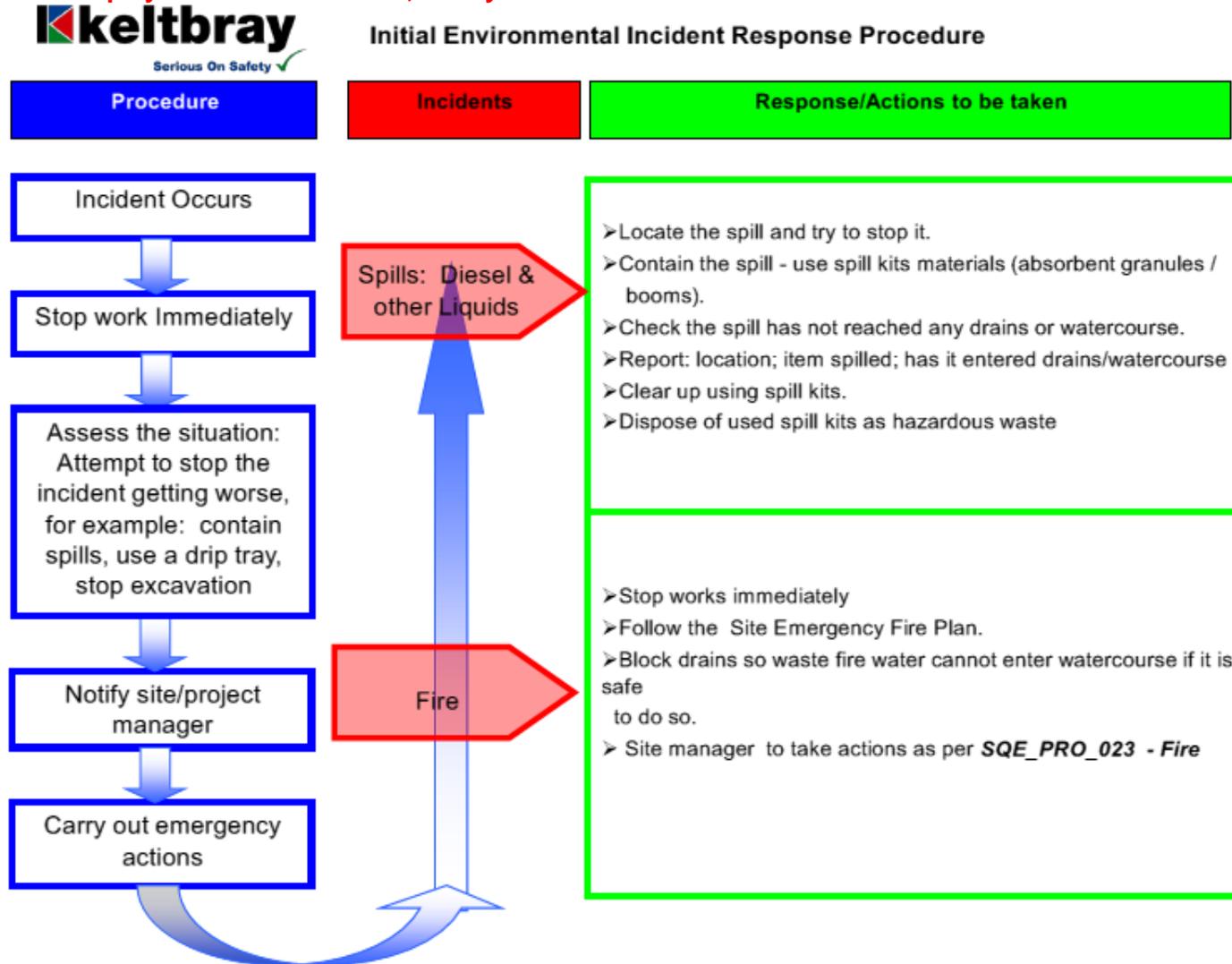
TBC

APX 5: UK ENVIRONMENTAL REGULATORS

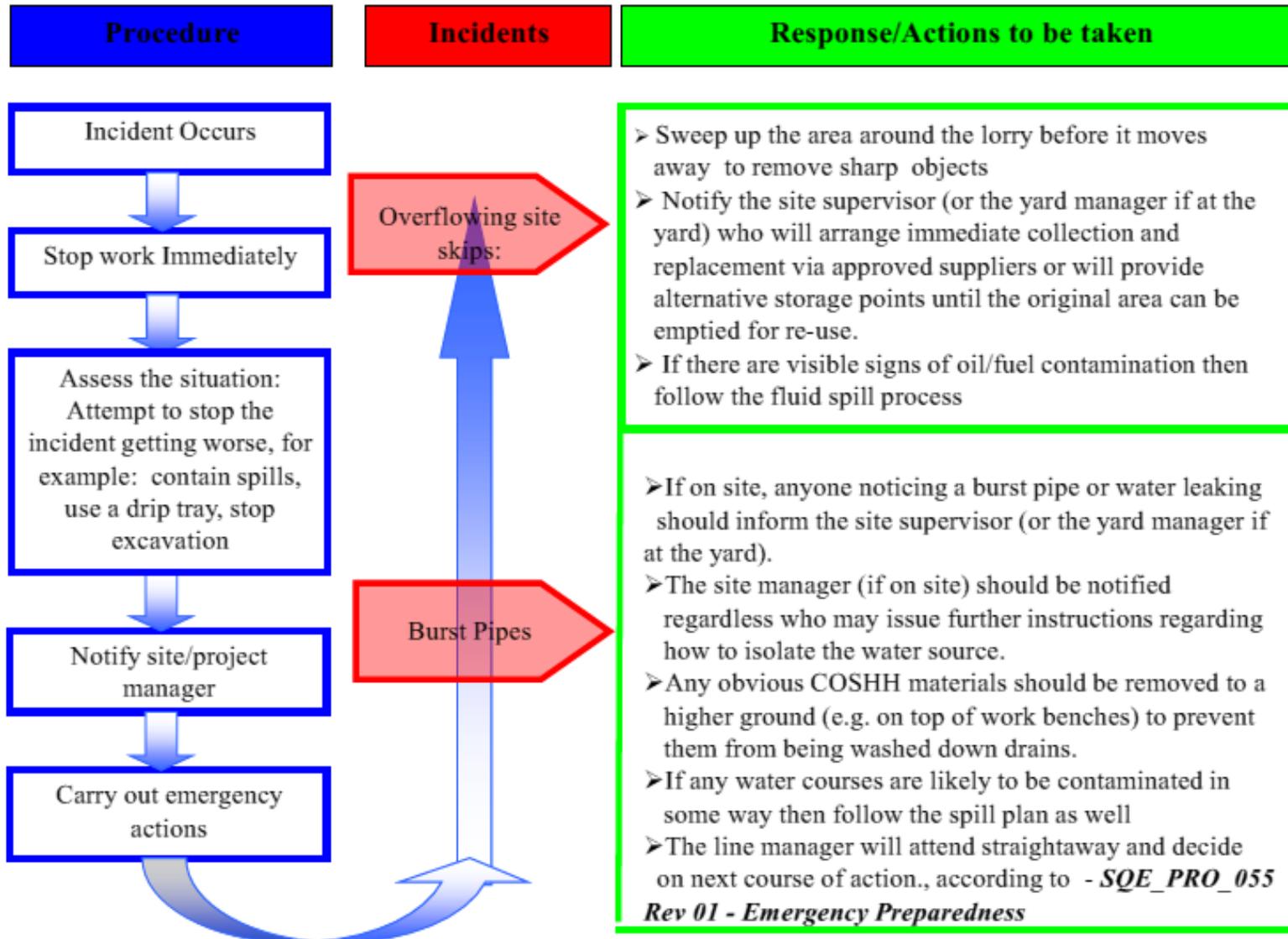
Regulator	Responsibilities	Contact number	Website
Environment Agency England and Wales	Discharges to land and controlled water, waste, effluent discharges, abstraction licences some nature conservation functions, ground contamination, enforcing environmental legislation	08708 506 506	www.environment-agency.gov.uk
Department of Environment Food and Rural Affairs (Defra)	Policy maker for all aspects of the environment, rural matters, farming and food production at national level	08459 33 55 77	www.defra.gov.uk
Local authority	Noise, air quality, traffic, the planning process and contaminated land. Some powers under waste legislation to stop, search waste carriers and confiscate vehicles	02076 063 030	www.open.gov.uk

APX 6: INITIAL ENVIRONMENTAL INCIDENT RESPONSE PROCEDURE

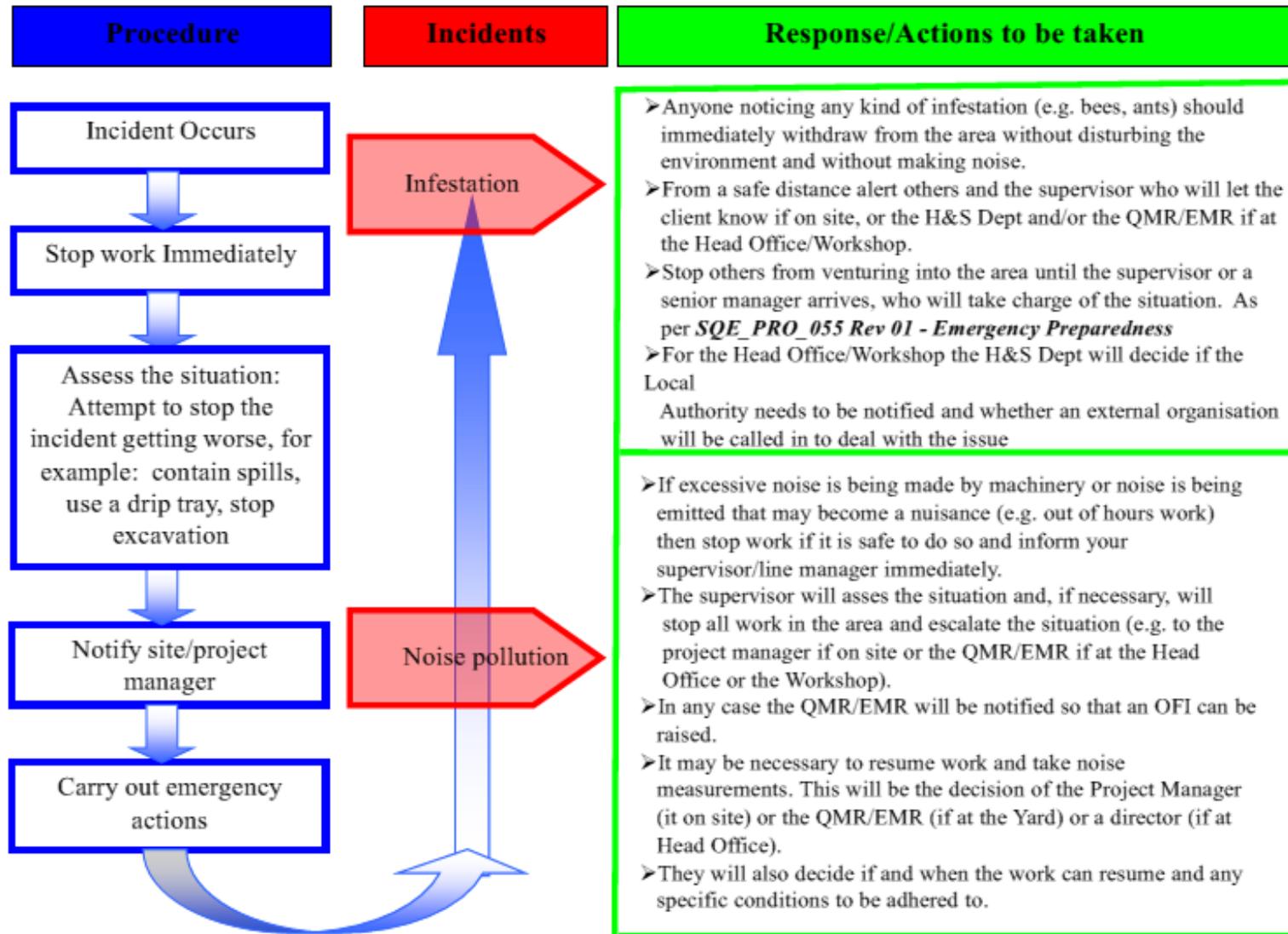
Note: This information must be displayed at the site Health, Safety and Environmental Information Board



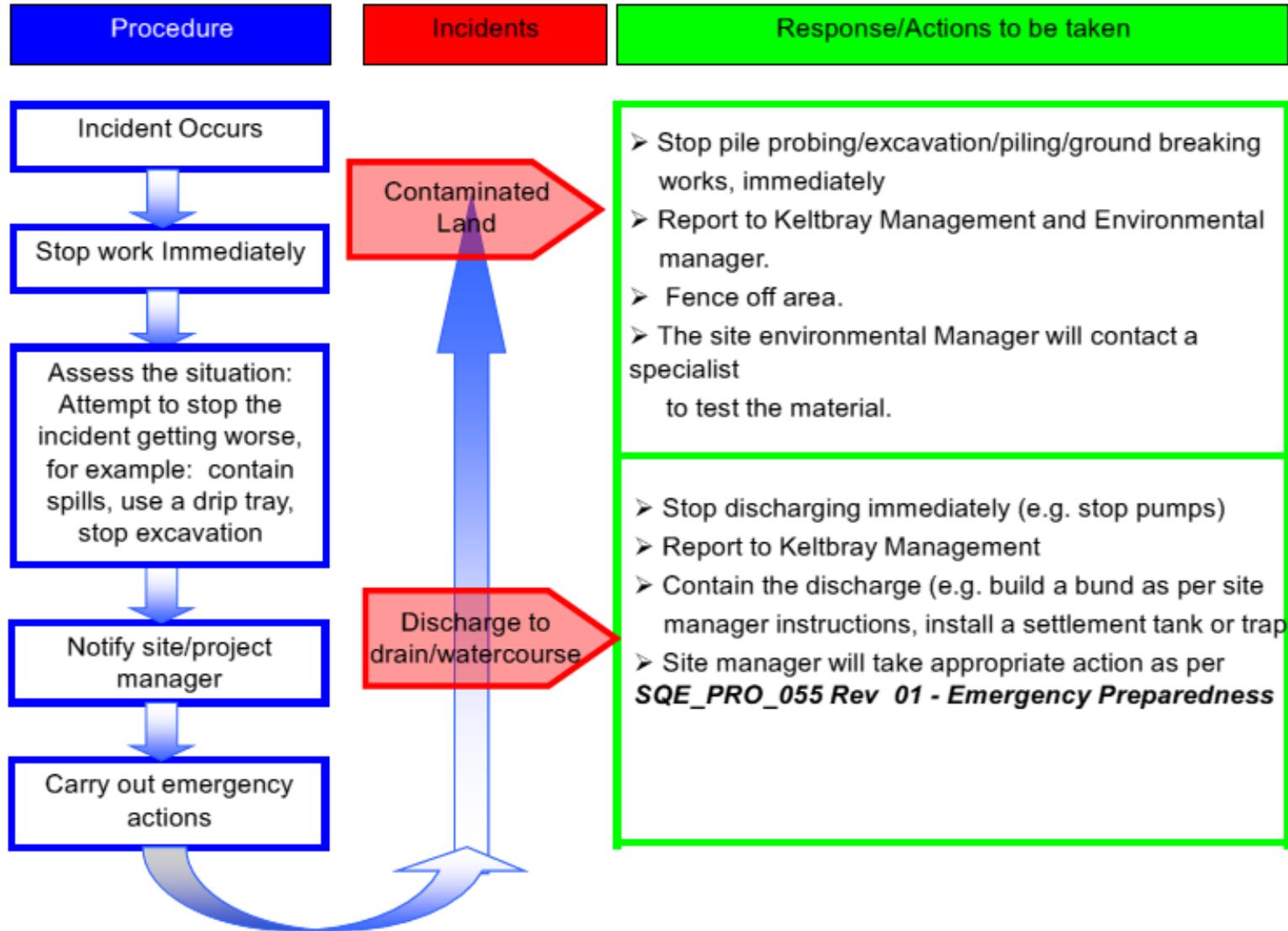
Initial Environmental Incident Response Procedure



Initial Environmental Incident Response Procedure



Initial Environmental Incident Response Procedure



APX 7: BASELINE ENVIRONMENTAL MONITORING REPORT

A baseline environmental monitoring report will be made available in the project folder on completion.