

# Metal recycling industry

Environmental management toolkit



# Waste Sector - Metal Recycling Sites



## Management Toolkit for Small and Medium Sized Businesses

### *What is it?*

A pack of information, with **helpful simple templates**, specifically aimed to help small and medium sized businesses manage their operations to **reduce the risk of harming the environment**. To work well it requires someone in your business to take responsibility for environmental management on site.

This management toolkit supports the more detailed guidance on environmental management provided by the Environment Agency, listed in *Section 7* of this toolkit. It is not intended to meet all the requirements of an environmental management system (EMS) specified in a permit issued under the Environmental Permitting Regulations 2007 (for more information on a permit EMS see the reference [“How to Comply with your Environmental Permit”](#) in Section 7 of this toolkit). However, it can be used to form part of such an EMS. It is designed for small and medium sized businesses regulated by the Environment Agency, but the templates and principles can also be used by non-regulated businesses, and will benefit them in many of the ways listed below.

### *Why use it?*

Most businesses have the potential to cause pollution. This management toolkit will help you consider:

- *Is there a less risky alternative to the way we do things?*
- *Is my equipment fit for purpose, inspected and maintained?*
- *Are my procedures and training adequate?*
- *In the event of something going wrong, am I prepared to deal with it?*

As well as answering these questions, this toolkit will also help you identify and manage your typical impacts on the environment, examples of which are listed on the next page.

### **As a result, benefits to a well managed site include:**

- improved **resource efficiency** and **productivity** which help to build a **sustainable** business
- reduce **risks and loss**
- reduced operating **costs**, including costs associated with environmental regulation
- more likely to **obtain business** from others that require their business partners to manage their environmental impacts effectively
- improved **reputation** amongst staff, customers and the public
- increased chance of **funding** for your business by demonstrating responsible environmental management
- improved **legal compliance**, avoid **prosecution**, receive fewer visits from environmental regulators

## Version for Metal Recycling Site

***This tool will help you identify and manage typical impacts on the environment:***

- **air emissions**, (e.g. dust from the storage, treatment and movement of waste)
- **land contamination**, (e.g. accidental spills of solvents and oils)
- **noise and odour pollution**, (e.g. vehicle movement, waste handling, storing, transporting)
- **Energy usage**, (e.g. poorly maintained machinery, inefficient procedures and motors)
- **waste disposal**, (e.g. such as solid and liquid wastes)
- **water discharges**, (e.g. run-off from waste storage or spills from sewage tankers)

### **Example: Tank bunds**

A bunded tank will contain a spill should an accidental leak or rupture occur. The bund will have prevented contamination of the groundwater which is commonly used for drinking water, or surface water which may be used for fishing.

It is important that your bunds are regularly inspected, maintained and collected rainwater regularly removed and disposed of properly.

### **Example: Site drainage**

A blocked drain could mean that rainwater containing sediment and other contaminants enters surface water courses. This can damage plants and wildlife and leave you open to prosecution.

Making sure your site drainage is free from blockages will reduce the chances of you polluting surface water courses. Know where the drain flows to and, if contamination needs to be contained in the event of a spillage, seal the drainage off and have a plan to handle the contained spillage in a responsible way.

## ***How should it to be used?***

The tools and templates within the toolkit are listed in the contents table on the next page. Your site responsible person should take the template versions in this toolkit and;

- amend them, if required, to make them specific for their site activity
- keep the tools and templates together in a file, or as an electronic document, for quick reference by site employees, customers and for the regulator during their visits
- track progress in preparing your toolkit by completing the last two columns in the contents table when it has been completed. It is suggested that you start with item 1 in the toolkit contents.
- If you require further help then speak to your regulator and/or use the references in *Section 7* of this pack

**In summary, with regard to environmental regulation, these simple tools will help you to:**

- show that activities that could harm the environment are under control
- develop an environmental management system for you site activities
- be less likely to breach your permit or cause pollution and, therefore, avoid enforcement action
- avoid having to pay higher charges for non-compliance (e.g. could help improve your Operational Risk Appraisal 'OPRA' rating)

<b>Pack Contents</b>	<b>Have you completed the template for your site and has it been filed?</b>	<b>Signed by: Date:</b>
1. <b>Environmental Impacts Plan and Controls</b>		
2. <b>Accident / Pollution Incident Management Plan</b> , including;  A – Site Plan  B – Key Site and Emergency Contacts  C – List of Substances and Storage Facilities  D – Preventing Accidents... and what to do if they happen		
3. <b>Maintenance Checklist</b> and maintenance record		
4. <b>Training Checklist / Record</b> for your staff		
5. <b>Complaints Form</b> for recording complaints about your site from members of the public.		
6. <b>Accident (and incident) recording form</b>		
7. <b>Further Help</b>		
8. <b>Posters</b> for own use and display at facility		

# MANAGEMENT TOOLKIT FOR SMALL AND MEDIUM SIZED BUSINESSES

## 1. Environmental Impacts Plan and Controls

<b>Table 1</b>																
<b>Site Activity:</b> <i>Please Specify</i>																
<p>The key pieces of environmental legislation affecting this sector are:</p> <p><i>(Add as many as apply to your site activities – you should ensure that this list is kept up to date for your site and covers all applicable legislation)</i></p>	<ul style="list-style-type: none"> <li>The Environmental Permitting (England and Wales) Regulations 2007, SI 3538</li> <li>Groundwater regulations 1998, SI 2746</li> <li>Water Resources Act 1991, as amended.</li> <li>Environmental Protection Act 1990</li> <li>Control of Pollution (Oil Storage) (England) Regulations 2001, SI 2954</li> </ul>							<ul style="list-style-type: none"> <li>Hazardous Waste Regulations (2005)</li> </ul>								
	<b>Process / Activity/Equipment</b>	<b>A</b>	<b>W</b>	<b>E</b>	<b>D</b>	<b>L</b>	<b>N</b>	<b>R</b>	<b>Process / Activity/Equipment</b>	<b>A</b>	<b>W</b>	<b>E</b>	<b>D</b>	<b>L</b>	<b>N</b>	<b>R</b>
<p><b>Processes / Activities / Equipment at your site:</b> (insert H or M or L where applies)</p> <p>List all the processes / activities / equipment at your site in these columns.</p> <p>Then put an (H) high impact, or (M) medium impact, or (L) low impact in the box next to the process / activity / equipment if it can result in an environmental impact listed below under normal or abnormal operation.</p> <ul style="list-style-type: none"> <li>➤ Emissions to Air (including dust) - <b>A</b></li> <li>➤ Emissions to Water - <b>W</b></li> <li>➤ Energy Usage (e.g. electricity, gas, oil) - <b>E</b></li> <li>➤ Waste Disposal - <b>D</b></li> <li>➤ Land Contamination - <b>L</b></li> <li>➤ Nuisance (i.e. noise or odour) - <b>N</b></li> <li>➤ Resource Consumption (e.g. water, chemicals, not energy) - <b>R</b></li> </ul>	e.g. Baling	L	-	M	L	-	H	-	Shearing							
	Bulking								Shredding							
	Compacting								Sorting							
	Crushing								<i>Others: (specify)</i>							
	Cutting															
	Storage															
	End disposal															
	Grading															
	Surface water drainage															
	Grinding															
	Screening															
	Separation															
	Drum washing, crushing, shredding and cutting															

# MANAGEMENT TOOLKIT FOR SMALL AND MEDIUM SIZED BUSINESSES

## 1. Environmental Impacts Plan and Controls (Table 1 – Continued)

<b>Table 1</b>																
<b>Site Activity:</b> <i>Please Specify</i>																
<p>The key pieces of environmental legislation affecting this sector are:</p> <p><i>(Add as many as apply to your site activities – you should ensure that this list is kept up to date for your site and covers all applicable legislation)</i></p>	•							•								
Process / Activity/Equipment	A	W	E	D	L	N	R	Process / Activity/Equipment	A	W	E	D	L	N	R	
<b>Processes / Activities / Equipment at your site:</b> (insert H or M or L where applies)																
List all the processes / activities / equipment at your site in these columns.																
Then put an (H) high impact, or (M) medium impact, or (L) low impact in the box next to the process / activity / equipment if it can result in an environmental impact listed below under normal or abnormal operation.																
➤ Emissions to Air (including dust) - <b>A</b>																
➤ Emissions to Water - <b>W</b>																
➤ Energy Usage (e.g. electricity, gas, oil) - <b>E</b>																
➤ Waste Disposal - <b>D</b>																
➤ Land Contamination - <b>L</b>																
➤ Nuisance (i.e. noise or odour) - <b>N</b>																
➤ Resource Consumption (e.g. water, chemicals, not energy) - <b>R</b>																

# MANAGEMENT TOOLKIT FOR SMALL AND MEDIUM SIZED BUSINESSES

## 1. Environmental Impacts Plan and Controls

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

Table 2A. Emissions to Air [A] (use as many forms as required)						
Process / Activity / Equipment on Site	Potential Impact	Is impact controlled by equipment?	Is equipment included on maintenance checklist?	Is impact controlled by a procedure ?	Person using the procedure received training?	Comments
e.g. Dust from site activity A ( <i>state specific activity</i> )	Potential for local air quality issues from dust. Also, a cause for complaints	No – fugitive emission from machinery movement	Not applicable	Yes – see procedure FE001/A	Yes – see training list	The dusty road is dampened down on a regular basis as per procedure
<i>Add any other that apply</i>						

**MANAGEMENT TOOLKIT FOR SMALL AND MEDIUM SIZED BUSINESSES**

<b>Table 2A (Continued) Emissions to Air [A] (use as many forms as required)</b>						
<b>Process / Activity / Equipment on Site</b>	<b>Potential Impact</b>	<b>Is impact controlled by equipment?</b>	<b>Is equipment included on maintenance checklist?</b>	<b>Is impact controlled by a procedure ?</b>	<b>Person using the procedure received training?</b>	<b>Comments</b>
<i>Add any other that apply</i>						

# MANAGEMENT TOOLKIT FOR SMALL AND MEDIUM SIZED BUSINESSES

Table 2B. Energy Usage [E] <i>(use as many forms as required)</i>						
Process / Activity / Equipment on Site	Potential Impact	Is impact controlled by equipment ?	Is equipment included on maintenance checklist?	Is impact controlled by a procedure ?	Person using the procedure received training?	Comments
e.g. Electricity usage for large machine / activity <i>A (state specific machine / activity)</i>	The impacts associated with electricity production are well documented (e.g. Air emissions) There is scope to reduce these impacts by using electricity efficiently on site.					
<i>Add any other that apply</i>						

**MANAGEMENT TOOLKIT FOR SMALL AND MEDIUM SIZED BUSINESSES**

<b>Table 2B (Continued) Energy Usage [E] (use as many forms as required)</b>						
<b>Process / Activity / Equipment on Site</b>	<b>Potential Impact</b>	<b>Is impact controlled by equipment ?</b>	<b>Is equipment included on maintenance checklist?</b>	<b>Is impact controlled by a procedure ?</b>	<b>Person using the procedure received training?</b>	<b>Comments</b>
<i>Add any other that apply</i>						

## MANAGEMENT TOOLKIT FOR SMALL AND MEDIUM SIZED BUSINESSES

Table 2C. Emissions to Water [W] <i>(use as many forms as required)</i>						
Process / Activity / Equipment on Site	Potential Impact	Is impact controlled by equipment ?	Is equipment included on maintenance checklist?	Is impact controlled by a procedure?	Person using the procedure received training?	Comments
e.g. Oil/Water separator	Oil passes through the separator into a watercourse potentially causing harm to environment	Yes – separator operation	Yes – see separate checklist	Yes – Procedure listed	Yes – November 2009	
e.g. Surface water run-off from buildings, car parks and concrete hard standing	Under normal conditions surface water run-off should be uncontaminated. However, if contamination occurs by accident, it has the potential to cause water pollution to local watercourse if there is a site drain failure					e.g. The accidental contamination case is considered in our Accident / Incident Management Plan
<i>Add any other that apply</i>						

**MANAGEMENT TOOLKIT FOR SMALL AND MEDIUM SIZED BUSINESSES**

<b>Table 2C (Continued) Emissions to Water [W] (use as many forms as required)</b>						
<b>Process / Activity / Equipment on Site</b>	<b>Potential Impact</b>	<b>Is impact controlled by equipment ?</b>	<b>Is equipment included on maintenance checklist?</b>	<b>Is impact controlled by a procedure?</b>	<b>Person using the procedure received training?</b>	<b>Comments</b>
<i>Add any other that apply</i>						

## MANAGEMENT TOOLKIT FOR SMALL AND MEDIUM SIZED BUSINESSES

Table 2D. Waste Disposal [D] <i>(use as many forms as required)</i>						
Process / Activity / Equipment on Site	Potential Impact	Is impact controlled by equipment ?	Is equipment included on maintenance checklist?	Is impact controlled by a procedure ?	Person using the procedure received training?	Comments
e.g. Hazardous Waste from activity A <i>(state specific machine / activity)</i>	e.g. Chemicals, ink jet cartridges, fluorescent tubes, waste oils, all must be handled in accordance with Hazardous Waste Legislation					
e.g. General unsorted waste	Most general unsorted waste is landfilled and this has associated impacts e.g. ecotoxicity, global warming and nuisance e.g. odour. General waste volumes can be reduced if sorting systems are used. Need to meet legal Duty of Care requirements.					
<i>Add any other that apply</i>						

**MANAGEMENT TOOLKIT FOR SMALL AND MEDIUM SIZED BUSINESSES**

<b>Table 2D (Continued) Waste Disposal [D] (use as many forms as required)</b>						
<b>Process / Activity / Equipment on Site</b>	<b>Potential Impact</b>	<b>Is impact controlled by equipment ?</b>	<b>Is equipment included on maintenance checklist?</b>	<b>Is impact controlled by a procedure ?</b>	<b>Person using the procedure received training?</b>	<b>Comments</b>
<i>Add any other that apply</i>						



**MANAGEMENT TOOLKIT FOR SMALL AND MEDIUM SIZED BUSINESSES**

<b>Table 2E (Continued) Nuisance (e.g. Noise, Odour) [N] (use as many forms as required)</b>						
<b>Process / Activity / Equipment on Site</b>	<b>Potential Impact</b>	<b>Is impact controlled by equipment ?</b>	<b>Is equipment included on maintenance checklist?</b>	<b>Is impact controlled by a procedure ?</b>	<b>Person using the procedure received training?</b>	<b>Comments</b>
<i>Add any other that apply</i>						

# MANAGEMENT TOOLKIT FOR SMALL AND MEDIUM SIZED BUSINESSES

Table 2F. Resource Consumption (not energy) [R] <i>(use as many forms as required)</i>						
Process / Activity / Equipment on Site	Potential Impact	Is impact controlled by equipment ?	Is equipment included on maintenance checklist?	Is impact controlled by a procedure ?	Person using the procedure received training?	Comments
e.g. use of chemicals for activity A <i>(state specific activity)</i>	Harm to human health or escape to the local environment. Management of hazardous substances according to COSHH and Hazardous Waste Regulations					
e.g. use of water	Inefficient use results in natural resource depletion					
<i>Add any other that apply</i>						

**MANAGEMENT TOOLKIT FOR SMALL AND MEDIUM SIZED BUSINESSES**

<b>Table 2F (Continued) Resource Consumption (not energy) [R] (use as many forms as required)</b>						
<b>Process / Activity / Equipment on Site</b>	<b>Potential Impact</b>	<b>Is impact controlled by equipment ?</b>	<b>Is equipment included on maintenance checklist?</b>	<b>Is impact controlled by a procedure ?</b>	<b>Person using the procedure received training?</b>	<b>Comments</b>
<i>Add any other that apply</i>						

**MANAGEMENT TOOLKIT FOR SMALL AND MEDIUM SIZED BUSINESSES**

<b>Table 2G. Land Contamination (e.g. storage of hazardous substances) [L] (use as many forms as required)</b>						
<b>Process / Activity / Equipment on Site</b>	<b>Potential Impact</b>	<b>Is impact controlled by equipment ?</b>	<b>Is equipment included on maintenance checklist?</b>	<b>Is impact controlled by a procedure ?</b>	<b>Person using the procedure received training?</b>	<b>Comments</b>
e.g. Storage of substance A ( <i>specify specific substance</i> )	Substance A can cause harm to the ecotoxicity of the soil, and could leak into groundwater.					
<i>Add any other that apply</i>						

**MANAGEMENT TOOLKIT FOR SMALL AND MEDIUM SIZED BUSINESSES**

<b>Table 2G (Continued) Land Contamination (e.g. storage of hazardous substances) [L] (use as many forms as required)</b>						
<b>Process / Activity / Equipment on Site</b>	<b>Potential Impact</b>	<b>Is impact controlled by equipment ?</b>	<b>Is equipment included on maintenance checklist?</b>	<b>Is impact controlled by a procedure ?</b>	<b>Person using the procedure received training?</b>	<b>Comments</b>
<i>Add any other that apply</i>						

# MANAGEMENT TOOLKIT FOR SMALL AND MEDIUM SIZED BUSINESSES

<b>Table 3. General Waste Management (use as many forms as required)</b>					
<b>Waste Produced at Site (with EWC, if known)</b>	<b>Where does the waste go?</b>	<b>Can it go to recovery / recycling?</b>	<b>Is it being stored correctly on site?</b>	<b>Are Duty of Care requirements being met?</b>	<b>Comments</b>
e.g. General waste (EWC ref) sent for disposal	ABC landfill	No – Checked on 1/11/09	Yes – Checked on 1/11/09	Yes – Checked on 1/11/09	State the checks that were made and refer to any documentation



## **2. Accident / Pollution Incident Management Plan**

Further help is available from [PPG21: Pollution incident response planning](#) (See section 7)

Created by: \_\_\_\_\_ Date: \_\_\_\_\_

Review Date: \_\_\_\_\_ Version: \_\_\_\_\_

### **Accident / Pollution Incident Management Plan Contents**

A – Site Plan

B – Key Site and Emergency Contacts

C – List of Substances and Storage Facilities

D – Preventing Accidents / Incidents... and what to do if they happen.

### **A – Site Plan**

Insert site plan showing location of the following items:

- **Site entrances and exits** available to the emergency services
- **Buildings**; the buildings and other main constructions
- **Drainage**; including
  - foul drainage (marked in red),
  - surface water drainage (marked in blue)showing
  - the direction of flow and
  - the discharge points to the sewer, watercourse or soakaway.
  - The location of manhole covers and drains,
  - The location of stop and diverter valves and interceptors
- **Service mains**; the routes of
  - water supply, gas, electricity)
  - mains water stop tap, and gas and electrical supply isolating valves / switch.
- **Storage of hazardous materials**; eg oil and fuel tanks, chemical stores, raw materials, waste materials etc.
- **Process lines**; location and direction of main process lines/pipes.
- **Accident and emergency response items**; such as fire extinguishers, fire hydrants, fire water tanks / ponds, spill kits, sand bags, alarms, first aid kit etc.
- **Vulnerable receptors**; on site or adjacent receptors that could be affected by the site operations, such as porous / unmade ground, watercourses, springs, boreholes, ecologically sensitive sites, residential properties, schools, offices, hospitals etc.
- **Pollution control points**; such as inspection or monitoring points, bunds,.
- **Treatment**; location of any on site trade effluent or sewage effluent treatment plant.

## MANAGEMENT TOOLKIT FOR SMALL AND MEDIUM SIZED BUSINESSES

### **B – Key Site and Emergency Contacts**

This table contains information and contacts you may need in an emergency  
*(amend, as required, to suit your site).*

<b>SITE DETAILS</b>			
Location:			
Postcode:			
Site Access Grid Reference:			
<b>SITE CONTACTS</b>	Name	Office Hours (specify)	Out of hours
Owner:			
General Manager:			
Site Manager:			
Site Supervisor:			
Security Contact:			
Landowner / Agent:			
<b>EMERGENCY SERVICES</b>		Office Hours	Out of hours
Emergency		999	999
Medical:			
Police:			
Fire:			
<b>REGULATORS</b>		Office Hours	Out of hours
Health and Safety Executive (HSE)			
Local Authority:			
Environment Agency (Local)			
EA (24 hour emergency hotline)		0800 80 70 60	
Natural England (for Wales, Countryside Council for Wales)			
<b>UTILITY / KEY SERVICES</b>	Name	Office Hours	Out of hours
Water undertaker:			
Sewerage undertaker:			
Gas supplier:			
Electricity supplier:			
Oil supplier:			
Fuel supplier:			
Chemical supplier:			
Oil spill contractor:			
Maintenance contractor:			
Electrician:			
Plumber:			
Locksmith:			
Joiner:			
<b>OTHER KEY CONTACTS</b>		Office Hours	Out of hours
Head Office:			
Adjacent landowners:			
Neighbours:			
Specialist advisors:			





### D - Preventing Accidents / Incidents ..... and what to do if they happen

The following table is a list of the things that could go wrong and harm the environment. The list covers many of the things that could go wrong for a site such as yours but you should look and see if you can see anything else specific to your site that could cause a problem. If you can then add it to the list.

The table describes what you should be doing to reduce the chances of each possibility happening. It also describes what should be done if the worst actually happens.

#### HOW TO COMPLETE & REVIEW YOUR PLAN

- Read each line and see if they are right for your site. Some may not be applicable. You may need some different ones.
- Make sure you are committed to doing the things it says as you will be held to them.
- If it refers to using equipment such as spill-kits, make sure you have these available.
- Finally make sure that all your staff know about the plan, where to find it, and what it contains. It is important that they know how to prevent accidents and what to do.

Once your plan is completed, test it regularly and make a record of this. You can design exercises to be discussion based, table top or live. You can set them up to test the whole plan or critical elements within it such as:

- contacts lists;
- the activation process;
- equipment;

If possible, include external parties as this helps validate your plan.

Frequency of testing should be related to the environmental risk your site poses, staff turnover, the introduction of new processes or materials and conclusions from any previous exercises or incidents.

You should review your plan, as a minimum, every 3 to 4 years. You may need to review this plan following an incident, accident, complaint or if the Environment Agency asks you to do so.

## MANAGEMENT TOOLKIT FOR SMALL AND MEDIUM SIZED BUSINESSES

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

## MANAGEMENT TOOLKIT FOR SMALL AND MEDIUM SIZED BUSINESSES

Possible Accident / Incident	What would the harm be?	How do we reduce the chances of it happening?	What to do if it happens
Puncture; of vessels and tanks etc due to impact – such as fork lift trucks.	Contamination of land, drains, groundwater and watercourses..	<p>and tanks will be tested for integrity.</p> <p>Insulation and protection of pipe work.</p> <p>Tanks and vessels generally located within / on secondary containment facilities.</p> <p>Storage locations of drums and non-permanent vessels protected by use of barriers or fencing.</p> <p>Movement of drums and containers using safe techniques.</p>	Spill response procedure as described above.
<i>Others: Please Specify</i>			
<b>Fire</b>			
Fire	<p>Smoke and pollution,</p> <p>Firewater causes contamination of land, groundwater and watercourses.</p>	<p>Separation of incompatible materials and of combustible materials and ignition sources.</p> <p>Incorporation of fire breaks into site layout and containment of fire water.</p> <p>No smoking policy.</p> <p>Maintain tidy site and minimize stockpile of combustible materials.</p> <p>Fire training and emergency drills.</p>	Fire procedure describing what to do in the event of a fire, including details about fire alarms, exit routes and muster points, responsible personnel such as a fire warden and the location and use of emergency fire equipment such as extinguishers, hoses, sand bags and drain covers.
<b>Cross contamination</b>			
Due to transfer and mixing of incompatible materials, drainage cross connections etc.	<p>Explosion, smoke and pollution of air,</p> <p>Contamination of land, drains, groundwater and watercourses.</p>	<p>Maintenance of up to date drainage plan.</p> <p>Maintenance of inventory of substances with material property details.</p> <p>Procedure for contractors to work on site including induction training and permit to work.</p> <p>Fail-safe filling systems.</p>	Fire procedure as described above.

## MANAGEMENT TOOLKIT FOR SMALL AND MEDIUM SIZED BUSINESSES

Possible Accident / Incident	What would the harm be?	How do we reduce the chances of it happening?	What to do if it happens
<i>Others: Please Specify</i>			
<b>Flood</b>			
Due to ingress of watercourse floodwater, blocked drains, burst water main, use of fire water.	Contamination of raw materials, buildings, land, drainage system, groundwater and watercourses with fire and flood water.	Maintenance of drains. Fitting of flap / non return valves on drains. Safe location for storage of hazardous materials.	Flood procedure describing what to do in the event of a flood warning such as installation of barge boards, use of sand bags, movement or protection of sensitive materials.
<i>Others: Please Specify</i>			
<b>Failure of Services</b>			
Due to failure of supply; water, electricity, gas supply and of sewerage system.  Due to utility supply being struck and broken / cut.	Flooding, explosion with subsequent contamination of land, drains, groundwater and watercourses.	Provision of standby facilities. Maintenance of up to date plans showing location of utility services. Procedure for contractors to work on site including induction training and permit to work.	Utility supply failure procedure describing what to do in the event of services supply failure such as manual shut down of process valves, start up of emergency generator, use of standby materials etc.  Flood and fire procedure as described above.
<i>Others: Please Specify</i>			
<b>Failure of Containment</b>			
Failure of containment facilities due to land movement, impact, corrosion etc.	Contamination of land, drains, groundwater and watercourses.	Provision of secondary containment for hazardous liquids. Inspection of primary and secondary containment facilities. Integrity testing of tanks and bunds & pressure loss alarms.	Spill response procedure as described above.

## MANAGEMENT TOOLKIT FOR SMALL AND MEDIUM SIZED BUSINESSES

Possible Accident / Incident	What would the harm be?	How do we reduce the chances of it happening?	What to do if it happens
<i>Others: Please Specify</i>			
<b>Vandalism</b>			
Unauthorised entry and tampering or malicious damage to property, plant and equipment.	Contamination of land, drains, groundwater and watercourses.	Secure gate and perimeter fence. Site locked when un-manned, tanks and valves locked when not in use out of hours. Plant and equipment locked in secure storage out of hours. Security system installed including camera and recording facilities.	Spill response procedure as described above.

**3. Maintenance Checklist**

**(Metal Recycling Site) – Use as many of these forms as required (the examples included may or may not be applicable for your site – amend as appropriate)**

Item requiring maintenance	How often? (tick the appropriate box)						Where are maintenance instructions?	Who is responsible?
	Day	Week	Month	Year	2 years	5 years		
Check the oil interceptor		✓					Cabin wall	
Check drains and drainage channels for blockages.		✓						
Clean up spills on surfaced areas or tank bunds	✓							
Check state of fences and gates – (to avoid vandals or children getting in and, for example, letting liquids out of a tank).		✓						
Visually check the un-surfaced areas to ensure that there are no spills. Clean up if necessary.		✓						
Check bunds are not filling with rainwater – pump out if necessary (via the oil interceptor).			✓					
Check the de-pollution area concrete for cracks or excessive oil.				✓				
Inspect the bunds for potential leaks, cracks, holes etc.				✓				
Integrity testing of underground pipes / tanks								
Maintenance of mechanical grab. (As advised by the supplier.)								
Maintenance of depollution equipment (As advised by the supplier.)								
Maintenance of baler (As advised by the supplier.)								
Maintenance of fork truck. (As advised by the supplier.)								
Maintenance of petrol storage. (As advised by the supplier.)								
Maintenance of Battery storage boxes								
Check Storage Tank capacity to prevent possible overfilling								







**MANAGEMENT TOOLKIT FOR SMALL AND MEDIUM SIZED BUSINESSES**

**4. Training Checklist**

**(Metal Recycling Site) - Use as many of these forms as required**

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

JOB	TRAINING REQUIRED (tick boxes to show who needs which training)														COMMENTS		
	Environmental awareness						Maintenance/operations					Accidents and emergency					
	Certificate of Technical Competence	Supervision of waste management sites	Environmental and permit awareness	Waste receipt inc Duty of Care	Waste separation and storage		Maintenance of mechanical grab	Maintenance of separation conveyor	Maintenance of baler	Maintenance of shearer	Maintenance of shredder	Maintenance of Eddy Current alloy separation system	Fire procedure	Spill response procedure		Flood procedure (where applicable)	Failure of services
Site Manager																	
Site Supervisor	√	√		√									√	√	√	√	
Site operator A			√		√		√										
Site operator B																	
Contractor 1																	

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

**4. Training Checklist (Continued)**

**(Metal Recycling Site) - Use as many of these forms as required**

JOB	TRAINING REQUIRED (tick boxes to show who needs which training)															COMMENTS		
	Environmental awareness					Maintenance/operations					Accidents and emergency							
	Add as required					Add as required						Add as required						


**MANAGEMENT TOOLKIT FOR SMALL AND MEDIUM SIZED BUSINESSES**

**Training Record** *(use as many forms as required)*

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

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

**5. Complaints Record**

Who made the complaint?	Name:	
	Address	
	 Phone No	
Date and time they made the complaint		
What happened, what was it about?		
Was anyone else aware of this – other neighbours or your staff? If so who?		
Did the complaint relate to your site? If so, what happened? What went wrong?		
What have you done to make sure that it does not happen again?		
Was there any <b>significant pollution</b> or <b>environmental damage</b> to land, water or protected areas – for example: dust, odour or noise pollution outside the site or spillage of polluting liquids onto the ground, or at a site of special scientific interest, or into a drain or a watercourse? (If so, then complete an incident form in Section 6)		
If there was, then you must take steps to prevent further damage and notify the Environment Agency on <b>0800 807060</b> and any other relevant regulators <b>ASAP</b> . <b>Have you done so? Yes / No</b>	Who did you phone? At what time did you phone?	
You must also write or send an email to confirm this to the local office (see your accident management plan for the address) Have you done so?	Yes/No What date did you contact?	
Please print your name and sign:		

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

**6. Accident (and Incident) Record**

**Record of accidents, incidents or near misses**

This form could apply equally to health and safety, we are particularly interested in things that could impact on the environment, for example: dust, odour or noise outside the site or spillage of polluting liquids onto the ground, into a drain or a watercourse.

It is good practice to record near misses – eg the vandals opened the valve on the tank but the bund caught everything and no harm was done. You do not have to inform us of this sort of thing.

Date and time of the incident	
What happened, what was it about?	
Was anyone else aware of this – other witnesses? If so who?	
What caused it?	
What have you done to make sure that it does not happen again?	
Was there any <b>significant pollution</b> or <b>environmental damage</b> to land, water or protected areas – for example: dust, odour or noise pollution outside the site or spillage of polluting liquids onto the ground, or at a site of special scientific interest, or into a drain or a watercourse? If so what?	
Is there a continuing threat? Yes / No	
If there was (or still is), then you must take steps to prevent further damage and notify the Environment Agency on <a href="tel:0800807060">0800 807060</a> and any other relevant regulators <b>ASAP</b> .  Have you done so? Yes / No	Who did you phone?  At what time did you phone?
You must also write or send an email to confirm this to the local office (see your accident management plan for the address) Have you done so?	Yes/No  What date did you contact?
Please print your name and sign	

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

## **7. Further Help**

### **Pollution Prevention Guides**

(<http://www.environment-agency.gov.uk/ppg>)

**PPG1:** General Guide to the Prevention of Pollution

**PPG2:** Above ground oil storage tanks

**PPG3:** Use and design of oil separators in surface water drainage systems

**PPG4:** Disposal of sewage where no mains drainage is available

**PPG8:** Safe storage and disposal of used oils

**PPG13:** The use of high pressure water and steam cleaners

**PPG18:** Managing fire water and major spillages

**PPG21:** Pollution incident response planning

### ***Pollution Prevention Pays – Getting Your Site Right (24-page Guide & DVD)***

(<http://www.environment-agency.gov.uk/business/topics/pollution/36641.aspx>)

### ***How to Comply with Your Environmental Permit***

(<http://www.environment-agency.gov.uk/business/topics/permitting/32320.aspx>)

**NetRegs** – NetRegs provides **free environmental guidance** for small and medium-sized businesses in the UK

(<http://www.netregs.gov.uk/>)

### ***Environment Agency Contact Information – National Customer Contact Centre***

(<http://www.environment-agency.gov.uk/contactus/default.aspx>)

National Customer Contact Centre  
PO Box 544  
Rotherham  
S60 1BY

**Telephone:** 08708 506 506 (Mon-Fri, 8am - 6pm)

## 8.Posters

# Good Management Pays



### Look out for:

- Smells
- Noise
- Dust
- Pests
- Spills and leaks



**Would you like to find out more about us,  
or about your environment?**

**Then call us on**

**08708 506 506\*** (Mon-Fri 8-6)

**email**

**enquiries@environment-agency.gov.uk**

**or visit our website**

**www.environment-agency.gov.uk**

**incident hotline 0800 80 70 60** (24hrs)

**floodline 0845 988 1188**

**Download the toolkit from the Environment Agency website at:**

**[www.environment-agency.gov.uk/business/topics/pollution/113738.aspx](http://www.environment-agency.gov.uk/business/topics/pollution/113738.aspx)**

**or the NetRegs website at:**

**[www.netregs.gov.uk/netregs/113676.aspx](http://www.netregs.gov.uk/netregs/113676.aspx)**



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