



Environmental Policy Document



This Policy will be reviewed as necessary to ensure it complies with all relevant Regulations, Codes of Practice, etc.

Issue	June 2020	N. Redpath CMIOSH
Revision A	June 2021	N. Redpath CMIOSH
Revision B	June 2022	N. Redpath CMIOSH
Revision C	June 2023	N. Redpath CMIOSH
Revision D		

Environmental Policy Statement

R.M Myers & CO.LTD is committed to the development of environmental solutions and to improve on environmental best practice. R.M Myers & CO.LTD is also committed to minimising its impacts and effects on the local and global environment.

Continual monitoring and reporting will help R.M Myers & CO.LTD achieve its aims and objectives, which are as follows: -

- Undertake environmental assessments on all projects prior to commencement. This will ensure regulatory and local bylaws are complied with.
- Develop practical and coherent plans on how to manage the results of the assessment.
- Liaise with local communities and develop acceptable solutions wherever possible.
- Execute the works to minimise the effects of noise, dust and inconvenience to those affected.
- Actively encourage all employees to consider how to reduce waste, reuse or recycle prior to disposal.
- Recognise the importance of training and updating our employees on environmental best practice.
- Where there is opportunity, aim to influence the client on positive environmental solutions.
- Comply with the legal and other requirements and adopt good monitoring systems to maintain compliance.
- During the project, protect important wildlife habitats and archaeological sites.

Signed: Date:
Director responsible for Environmental Management

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Policy Overview

R.M Myers & CO.LTD accept that effective environmental management on site requires a team effort. This includes input from the main contractor (principal contractor) and sub-contractors onsite, the contractors' organisation off site, designers, clients and suppliers. To manage this teamwork effectively the **site manager** should follow the steps outlined below. So should the managers of any sub-contractor on site that has the potential to cause environmental impacts through its activities - which applies to all trades and operations.

Step 1 – Identify the environment obligations of the project

- Identify legal obligation
- Identify environmental requirements contained in the project brief, specification or contract documents. This should include a review of any Environment Impact Assessment, Environmental Statement or other client/designer derived assessment.

Step 2 – Identify the environmental risks (including emergencies) particular to the site

- Review relevant documentation identified in Step 1
- Talk to environmental regulators about their concerns for the site at an early stage
- Liaise with clients and designers to establish how they can help identify and overcome potential environmental difficulties.
- Compile a risk register for the site
- During site induction alert all site personnel to the risks associated with the construction on site

Step 3 – Identify environmental responsibilities

- Define the environmental responsibilities of all personnel working on site, including those who are involved in implementing and monitoring initiatives
- Define lines of communication between site personnel, and those responsible for producing the site environmental plan (see below)

Step 4 – Establish an environmental management plan (EMP)

- Information gathered in Steps 1 to 3 can be used to form the basis of an Environmental Management System (EMS).
- The most important features of an EMP is that it is site specific, accessible regularly revised and in constant use
- The site EMP can be used to develop method statements for specific components of work

- Method statements are key documents on site as these will be referenced during the process and will incorporate not only environmental, but also all other requirements e.g. health and safety and buildability

Step 5 – Monitoring and follow up

- A robust monitoring system should be implemented to ensure you are meeting the requirements of your EMP
- All monitoring data should be retained so there is an auditable trail
- Monitoring refers to a wide range of activities, including:
 - Audit reports
 - Maintaining and reviewing training records
 - Chemical analysis of discharges and nearby streams
 - Waste transfer notes
 - Records of dust generation
 - Noise monitoring records.

The management framework

Sub-contractor responsibilities and the supply chain

Sub-contractors and those further down the supply chain need to understand their environmental obligations and ensure they meet them. As with any controls, environmental responsibility can be implemented with incentives or penalties. It is important for contractors and sub-contractors to work together to ensure successful delivery of projects (see checklist below for suggestions on selecting and managing sub-contractors).

Checklist – Selecting and managing sub-contractors

- Sub-contractors should present proof of their past environmental performance along with records of past and pending prosecutions
- Ensure that sub-contractors have a copy of the site EMP before commencing work
- Ensure sub-contractors attend environmental training sessions/inductions
- Ensure sub-contractors are aware of their environmental obligations on the project
- The contract should include requirements to follow good environmental practice
- Audit the performance of sub-contractors during the project.

Environmental Legislation

Below is a list of environmental legislation that is pertinent to R.M Myers & CO.LTD 's activities. R.M Myers & CO.LTD will update the list using the Environment Agency website.

www.gov.uk/government/organisations/environment-agency

- **Environmental Protection Act 1990**

EA Section 33 of the Act states that any person shall not (subsection (1)(a) deposit controlled waste or extractive waste, or knowingly cause or knowingly permit controlled waste or extractive waste to be deposited in or on any land unless an environmental permit authorising the deposit is in force and the deposit is in accordance with the licence and submit controlled waste, or knowingly cause or knowingly permit controlled waste to be submitted, to any listed operation (other than an operation within subsection (1)(a)) that—

(i) is carried out in or on any land, or by means of any mobile plant, and

(ii) is not carried out under and in accordance with an environmental permit.

(c) treat, keep or dispose of controlled waste or extractive waste in a manner likely to cause pollution of the environment or harm to human health.

Section 34 introduces a statutory Duty of Care for all those producing or dealing with waste. As a waste producer, R.M Myers & CO.LTD has regard for this section of the EPA.

Environmental Protection (Duty of Care) Regs. 1991

EA Require anyone who produces, receives, holds, carries, treats or disposes of controlled waste or who, as a broker, has control of such waste, to prepare and retain written descriptions of waste and transfer notes and to furnish copies on request. The transfer notes should contain a description of the waste and all parties in the transaction and be kept for a minimum of two years. Waste should only be transferred to an authorised person. Waste transfer notices are retained by the business and are available for inspection at all times.

The Environmental Permitting Regulations (England and Wales) 2016

Some facilities could harm the environment or human health unless they are controlled. The environmental permitting regime requires operators to obtain permits for some facilities, to register others as exempt and provides ongoing supervision by regulators. It also repealed the Water Resources Act 1991 (most notably sections 85 to 91).

The Waste (England and Wales) Regulations 2014

If your business or organization produces or handles waste, you must take all such measures as are reasonable in the circumstances to prevent waste and apply the waste hierarchy when you transfer waste.

Regulation 13 cover duties in relation to collection of waste.

13.— (1) An establishment or undertaking which collects waste paper, metal, plastic or glass must, from 1st January 2015, take all such measures to ensure separate collection of that waste as are available to the establishment or undertaking in that capacity and are—

(a) technically, environmentally and economically practicable; and

(b) appropriate to meet the necessary quality standards for the relevant recycling sectors.

(2) For the avoidance of doubt, co-mingled collection (being the collection together with each other but separately from other waste of waste streams intended for recycling with a view to subsequent separation by type and nature) is a form of separate collection.

(3) Every waste collection authority must, when making arrangements for the collection of waste paper, metal, plastic or glass, ensure that those arrangements are by way of separate collection.

Regulation 35 covers the transfer note process when controlled waste is transferred.

Hazardous Waste (England and Wales) Regulations 2016 (as amended)

Producers of hazardous wastes are required notify the Environment Agency annually, if producing more than 500 kg of hazardous waste. (Includes fluorescent tubes, IT monitors, inks and toners.). Prior to hazardous waste being moved from premises, a consignment note is completed. These consignment note records must be retained for three years. Quarterly returns on all consignments of hazardous waste must be made to the producer from the consignee.

Landfill Tax Regulations 2016 (as amended)

In October 1996, a tax on waste disposal in landfill sites (Landfill Tax) was introduced in the UK.

A treasury tax of currently £82.60 per tonne on standard waste and £2.60/tonne for inert waste going to landfill is charged.

The landfill directive's overall objective is to supplement the requirements of the Waste Framework Directive and prevent or reduce as far as possible the

negative effects of landfilling on the environment as well as any resultant risk to human health.

Controlled Waste (Carrier of Carriers and Seizure of Vehicles) Regulations 1991 (as amended)

These regulations require you to register if you transport waste. You will need to register as a 'lower tier' or 'upper tier' registration.

Environmental Protection Act Part 2A Contaminated Land The Contaminated Land (England) Regulations 2006

Part 2A provides a means of dealing with unacceptable risks posed by land contamination to human health and the environment, and enforcing authorities should seek to find and deal with such land. The overarching objectives of the Government's policy on contaminated land and the Part 2A regime are to identify and remove unacceptable risks to human health and the environment, to seek to ensure contaminated land is made suitable for its current use and to ensure that the burdens faced by individuals, companies and society as a whole are proportionate, manageable and compatible with the principles of sustainable development.

The regulations provide the statutory framework for contaminated land. LA are required to identify contaminated land within their areas, with "Special Sites" being regulated by the EA. Identified sites are to be cleaned to a "suitable for use" standard, with remediation.

Notices being served on the person who originally caused the contamination, advocating the "Polluter Pays Principle". If this person cannot be found, then the owner/occupier will be held responsible. As a company we are not aware of any contamination to the land.

Environmental Protection Act 1990, Part III: Statutory Nuisance and Clean Air Noise and Statutory Nuisance Act 1993

Enables local authorities and private individuals to take action to secure abatement of nuisances such as noise, odours, dust etc. Concerned with street noise from sources such as vehicles, equipment, machinery and burglar alarms. Also deals with the recovery of expenses incurred by the local authority in abating statutory nuisance.

Control of Pollution (Oil Storage) (England) Regulations 2001

If you store more than 200 litres of oil above ground at an industrial, commercial or institutional site, then these regulations apply. All types of oil are covered by the regulations. Waste oils aren't included as these are regulated by the Environmental Permitting Regulations.

Tanks, drums and containers must be strong enough to hold the contents without leaking or bursting. Oil containers must be placed away from traffic routes. To avoid damage by collision. Secondary containment must be provided to provided containment of oil leaks, this includes its ancillary pipework.

Town & Country Planning (Environmental Impact Assessment) Regulations 2011

These regulations require that before granting “development consent” for projects, including development proposals, authorities should carry out a procedure known as environmental impact assessment (EIA) and produce an environmental statement (ES) for any project that is likely to have significant effects on the environment.

Waste Electric and Electronic Equipment (WEEE) Regulations 2015 (as amended)

These regulations impose obligations on producers of EEE they sell in terms of financing the collection, treatment, recovery, and environmentally sound disposal of WEEE.

Responsibilities

Managing Director

- Must be aware of the companies' legal responsibilities with regard to environmental control and management.
- Appoint a member of staff to have a specific duty to implement the policy and be responsible for environmental operational control.
- Monitor the performance of the environmental appointed person to ensure resources are available and duties are carried out.
- Ensure adequate resources are available to meet the requirements of the Environmental management system, with particular attention paid to environmental legal compliance and prevention of pollution.
- Establish an organisational system to ensure a hierarchy for environmental management is in place.
- Ensure the arrangements section of the policy is communicated to the entire workforce.
- Ensure that environmental legislation is closely monitored to maintain legal compliance.
- Ensure individuals are competent and trained to undertake their role successfully.
- Maintain overall responsibility for the competency and suitability of the management team.
- Monitor the effectiveness of the policy and instigate amendments where appropriate.
- Ensure pre-start meetings include a discussion on environmental aspects assessments.
- Include environmental compliance into the regular health and safety meetings.

Site Managers - Foreman

Site Managers shall be responsible for the overall implementation of the environmental policy and environmental impact assessment controls on their site.

The Site Managers must:

- Make themselves fully aware of the policy and any specific section which is relevant to them.
- Continually assess the environment throughout the project to prevent pollution and reduce the risk of local pollution and note any significant changes.
- Co-operate with all stakeholders' i.e. local residents or local authority, with regards to managing environmental risks.
- Be aware of the companies' legal responsibilities with regard to environmental control and management.
- Assess and monitor the project and all site activities to identify environmental aspects (cause), associated impacts (affect) and controls.
- Ensure meetings include a discussion on environmental issues and control.
- Monitor the performance of environmental control to ensure resources are available and duties are carried out.
- Include environmental compliance into the contractors' health and safety pre-start meetings.
- Ensure all contractors are aware of any issues which must be considered to protect the environment at induction.
- Manage waste on site using the environmental hierarchy of reduce, reuse, recycle and finally waste disposal.
- Check the credentials of the waste management company and make reasonable enquiries to ensure waste is transferred in compliance with their registration and environmental permit.

Site Managers / Foreman - continued

- Ensure a suitable number of skips are available for contract waste and monitor skips for mixing of active and inert waste.
- Ensure waste transfer or consignment notes are accurate.
- Ensure oil is stored within secondary containment systems.
- Ensure spill kits are available for environmental spillages.
- Undertake a post project assessment with the contracts manager to identify improvements which could have been made to that specific project and the policy overall.

Site Workers

- Make themselves fully aware of the policy and request to see any section which may be relevant to their work.
- Take note of any information which is being given to you via tool box talks or induction.
- Report to the manager any breaches of the site rules and any spills which may cause environmental pollution.
- Take action if a spill takes place which could pollute the waterways i.e. absorb oil spills or position an absorbent boom around surface water drains.
- Report to the managers any significant changes to the environment or damaged equipment (leaking hoses etc) to reduce the risk of pollution.
- Co-operate with all managers with regards to improving the environment and follow the system of work developed.
- Be aware of the companies' legal responsibilities with regard to environmental control.
- Follow the principles of good waste management on site using the environmental hierarchy of reduce, reuse, recycle and finally waste disposal.
- Ensure you do not contaminate the waste within skips by mixing the active and inert waste and do not mix non-hazardous and hazardous waste.
- Do not overfill skips, which causes litter and waste to spill onto the carriageway.
- Check waste transfer or consignment notes are accurate and report to the manager any discrepancies.
- Report to the managers any improvements which could have been made to that specific project.

Definitions

Environmental Pollution

Pollution of the environment is taken to mean pollution of the air, water and land from any industrial and commercial activity capable of causing harm to man and other living organisms on the planet.

Environmental aspect – An element of the companies' activities that can interact with the environment. (Diesel bund, excavation, waste management, etc.)

Environmental impact – Any change to the environment from activities which R.M Myers & CO.LTD have control. (Water pollution, air contamination, ground contamination etc.)

Waste – Includes any material which constitutes a scrap material, effluent or other unwanted surplus substance. Waste can then be sub divided into 4 types: -

Inactive waste – covers materials that do not undergo significant physical, chemical or biological reactions or cause environmental pollution when deposited at a landfill under normal conditions. These include uncontaminated soils and rocks, ceramics, concrete, masonry and brick rubble.

Putrescible waste – covers waste that will rot such as food and timber.

Active waste – are those that are not inactive wastes. They include acids, pesticides, wood preservative, oily sludge's, batteries, waste oils, asbestos, timber and plastics, bitumen etc. Some active wastes may also be special wastes. Active waste is subject to a higher rate of landfill tax than inactive waste.

Hazardous Waste – are that are deemed to be dangerous to life, they may be corrosive, reactive, explosive, oxidizing, carcinogenic or flammable. Some of the more common site special wastes include acids, alkaline solutions, oily sludge's, asbestos, waste oils and wood preservatives. The Hazardous Waste Regulations should be referred to for a comprehensive list.

Water Pollution – Pollution of controlled waters; these include watercourses, road drains, surface water gullies and water contained in underground strata.

Pollution means poisonous, noxious or polluting matter, solid matter or any trade sewage effluent. Examples are cement or concrete wash water which are highly alkaline, oil etc.

Definitions (continued)

Air Pollution – Dust, emissions and odours are defined as a nuisance under the Environmental Protection Act. In addition, smoke, fumes and gases from any site or premise may also be a nuisance. The person responsible (principal contractor, contractor etc.) can be required by the local authority to put a stop to the nuisance through an abatement notice. An aggrieved individual may apply to the magistrates for an abatement order. Breach of the notice or order is a criminal offence.

Noise and vibration radiating from the site are also defined as a statutory nuisance and are also covered under the Environmental Protection Act.

Ground Contamination- Contaminated land can be defined as any land which is shown to contain sufficient qualities or concentrations of a substance such as to pose a direct or indirect hazard to man, the environment, or other targets.

Industrial contamination has often migrated beyond the deposition zone, via leachate. Some contaminants date back to the industrial revolution and is often the result of a succession of different industries using the same site; in particular old buildings demolished containing asbestos.

Natural Contamination may be found where the industrial processes are so ancient that they are now considered natural (out washing of old Lead mines, heavy metals such as Cadmium, Mercury in soils)

Establishing the Site

When setting up the site, Contracts and Site Managers will plan the site layout and offices to minimise visual intrusion. In urban areas the site will usually be screened by a suitable, well-constructed hoarding, which will be maintained by the management to reduce fly-posting and graffiti.

Working hours

Site working hours will be established at the beginning of the project to reduce annoyance to the neighbours. On some projects the working hours are defined through contractual agreements or through local authorities who issue Section 60 or 61 notices under The Control of Pollution Act.

Lighting

Site lighting may be used as a deterrent to vandals and thieves. Lighting will be kept to a minimum brightness and located to reduce direct light into other properties. Infra-red lighting will be considered for security where necessary.

Security Measures

- The site boundary will be enclosed using high quality fencing, gates and locks. Where the site has regular public contact such as street and city works solid barriers (hoardings) will be used.
- Managers will avoid where possible the stacking of materials against the boundary fence, to reduce the risk of vandals and thieves access.
- The substances and materials which are potentially hazardous will be secured and fuel outlets will be locked.
- All plant will be secured, keys will be removed and plant will be immobilised when necessary.
- The site manager will consider the positioning of the site cabin to allow a good view of the site and will alert the local police if there are any signs of forced entry.

Establishing the Site (continued)

Managing Materials

The purchasing department and site management team will aim to minimise resource use and reduce the amount of waste sent for disposal by improving the management of materials and components at site level.

Better control will also reduce the likelihood of spillage incidents, contaminated materials from incorrect storage, less damage to building materials due to better storage, all which means less waste of raw materials.

Ordering Checklist

- Order the correct quantity of materials at a time near to when they are needed, therefore reducing storage times. This is a must on sites with spatial limitations.
- Prior to order, check in what form the materials will be delivered so that the correct plant can be arranged.
- Make sure that the delivery is received by a representative of R.M Myers & CO.LTD to supervise the delivery, carry out a quality inspection and to ensure the materials are delivered in the correct place.
- Store materials which are valuable in a secure lock up.
- Store materials away from vehicle movements where possible to reduce the risk of damage.
- Secure lightweight materials to protect them from wind damage.
- Ensure chemicals and hazardous substances are stored to comply with the manufacturer's instructions.

Vehicle Access Routes

R.M Myers & CO.LTD will plan site traffic routes to reduce problems with the local traffic and to ensure safety requirements are complied with in line with HSG 144 Management of vehicles and plant on construction sites.

Local residence will also be considered to reduce the problem of vehicle emissions, noise and the visual intrusion of queuing traffic.

Plans will be drawn up by the site management team to include, each access and egress route (preferably this will be arranged to allow the vehicles to enter and exit the site in a forward direction), the agreed lorry route by the nearest main road, clear unambiguous signage and established banksman for control of movements and unloading.

Checklist

- When ordering materials ensure that the drivers are aware of any traffic restrictions.
- Arrange for deliveries to reduce local traffic congestion (e.g. when working near schools, deliver before 8a.m. or after 9:15a.m.)
- Instruct drivers to switch off engines when waiting to reduce CO₂ emissions.
- Where possible arrange for delivery vehicles to go straight into site without having to queue outside.
- Where possible load and unload vehicles off the highway.
- Plan parking for site personnel vehicles.
- Utilise road sweepers to maintain local roads and reduce contamination, particularly when removing spoil.
- Ensure existing footpaths are maintained in good condition.
- Make good any damage to pavements as soon as possible.

Ground Contamination

Before a development begins all the land should be regarded as being potentially contaminated. The initial responsibility lies with the client, who should carry out a full site investigation, to include soil and water sample analysis and a geotechnical survey.

If contamination is located, then the contaminated area should have a clear boundary marked, usually fenced off to a height of 2 metres with adequate warning signs displayed.

Access to and from the site should be through a hygiene facility and by use of controlled washing systems for vehicles leaving the contaminated site.

Hygiene – must be situated at the most convenient access point to the contaminated area. Boot washes must be located immediately outside the hygiene unit.

The hygiene unit must be laid out to allow staged cleaning. Segregating storage of personal clothes, protective equipment, washing facilities and toilet facilities.

A trough sink must be available allowing cleansing of the forearm. Nailbrushes, soap and disposable towels to be provided. Hot and cold running water must be supplied. Toilets will be located next to the washing area so that the hands must be cleansed before using the facility.

Areas for eating and smoking should not be located in the contaminated area of the site. Such areas should, where possible, be accessible by going through the hygiene unit.

Cleaning of Cabs – The use of positive pressure cabs should be considered to prevent the entry of contaminants, otherwise the cabs on site should be vacuumed at the end of every shift to prevent the build up of contaminants.

A high pressure water jet, wash facility should be provided at the boundary of the contaminated site to wash the wheels, arches and underside of the vehicle when leaving the site. The disposal of such water should be discussed with the local water authority or recycled (recirculated) if possible.

Contaminated Land (continued)

Waste Removal

Sheets should be provided for skips or open top lorries when moving contaminated soils from the site. Sheeting should be carried out within the site. Where necessary a special designated gantry should be available to aid the fitting of sheets. Those involved with sheeting the lorry should avoid contact with the contamination.

Control of dusts – Where considerable quantities of dust will be produced, water sprays should be used to dampen down the dust (tractor with water bowser or water jet which has manual control of the water pressure). This will be necessary to protect not only the workers but the general public. Wind speed limits should also be considered to suspend works if the wind exceeds a certain level (e.g. gusting to 25mph) a wind speed meter will be required to accurately assess.

Personal Protective Equipment – An assessment on the PPE needs must be undertaken to protect workers. The protection usually required would include respiratory, skin hand (gloves) and body (disposable coveralls), foot protection (Wellingtons or boots without laces) and eyes due to contaminated dusts. The normal PPE considerations also apply such as head protection and high visibility clothing.

Site Monitoring – Air monitoring of working positions (particularly in the cabs of excavators) within the hygiene unit and in clean parts of the site should be considered depending on the level of risk posed. This will usually be detailed in the pretender plan or ground survey report. Boundary samples should also be taken to reassure the public.

Any water courses which may be subject to contamination should also be monitored.

Specialists in atmospheric monitoring techniques should be contacted prior to project commencement to identify the type of sampling required.

Contingency Plans

Contingency plans should be drawn up to deal with any residual contamination found on site. The plan must set out actions which should be taken by site management should contamination be found during the construction phase. Such measures may include encapsulating the contamination with an overlay of soil until specialist removal can be instigated.

Water

R.M Myers & CO.LTD accepts that water is a vital resource and aims to manage water properly on site. All site team management are made aware of the controls required to ensure that watercourses are not polluted during the project and that any pollutants getting into the surface water drain or groundwater will end up polluting local water systems.

The site management team will evaluate the potential water pollution risks

- Assess drainage drawings to establish surface water and sewage. And ensure they are in a suitable condition and connected to an outlet.
- Identify local watercourses which have the potential to be polluted.
- Working with groundwater and silty water from excavations.
- Works in contaminated ground and pumping water from excavations.
- Wash out from concreting operations.
- Spillage from chemicals and substances.

The site management team will then identify appropriate control methods (see next section on water – best practice) and pass on the information to relevant workers.

The site manager is then responsible for implementing and monitoring the control methods and initiating any pollution emergency response.

Water – Best Practice

Before starting the project carry out a survey to establish the location of the local streams and mark the position of the surface water drains and foul sewer. On sites with complex drainage it may be prudent to mark the surface water in blue and the foul sewer in red.

Ensure a survey has been undertaken on utility services, gas, water, electricity, telecommunications and drainage.

Water – Best Practice (continued)

Ensure services are protected against damage in particular to the environment, heavy plant tracking over manhole covers, which may cause collapse resulting in sewer blockage.

Disposing of water from site

Construction site run off and all waste waters must be disposed of in accordance with the requirements of the regulatory authorities, for example

- Consent is required from the local sewerage undertaker (Northumbrian Water) to discharge effluent to the public sewer
- Consent is required from the Environment Agency to discharge to a watercourse.

In most cases consent may take time. Therefore, the management team must plan ahead to avoid costly delays at site.

Spillage

Immediately catching the spill is the best emergency response which includes use of bunds around oil storage tanks, use of drip trays on mobile plant.

However, if a spillage occurs then spill kits, sand bags or even sand can be used as a barrier to block off drains or barrier sensitive areas.

Sand and soil which has become contaminated must be disposed of properly.

Vehicle Washing

Where possible vehicles should be washed in a bunded area or discharged to the foul sewer. On sites with a large muck shift a wheel wash system should be acquired which recirculates the water. The contaminated water should then be disposed of by a permitted disposal contractor.

Solid Wastes

Good controls on packaging and skips will reduce the risk of litter blowing into watercourses. Monitoring of local streams and rivers will help the manager quickly identify any problem areas.

Silty Water

A number of options are available as follows: -

- Pumping to grassland/fields – this procedure will require permission from the land owner and the Environment Agency
- Pumping into the foul sewer – this will require permission from the water companies (Northumbrian Water).

Water – Best Practice (continued)

- Pump to a settlement tank – retaining water in an undisturbed state long enough for the suspended solids to settle out. The clean water is then either pumped out or flows out of a discharge point.
- Filtration System – passing silty water through a steel tank fitted with a suitable filter.
- Finally, and the most costly pump into a tanker and dispose of off-site.

Emergency Spill

Ensure that the site manager has details on the procedure to be followed in the event of an emergency. If the spill is significant it should be reported to the Environment Agency on their pollution line 0800 807060.

A typical emergency plan will include:-

1. Employees to immediately report the pollution problem and the pollution source.
2. Stopping the flow of the source and switch off sources of ignition.
3. Avoiding the spread -
 - site drainage plan
 - Stem the flow
 - Dam the flow with spill kits or sand
 - Divert from drainage and watercourses
4. Only use sand or absorbent pads to mop it up
5. Shovel contaminated sand into sacks or skips
6. Dispose of contamination appropriately.

Waste

R.M Myers & CO.LTD aim to manage waste effectively on all its sites. R.M Myers & CO.LTD focuses on the amount of materials that are wasted, the way in which wastes are handled and the best method of disposal.

All managers will aim to effectively manage the waste by initially allocating sufficient space to store the waste. The space allocated will be assessed by identifying what types of wastes are being generated on site. The site manager will monitor the waste by:-

- Assessing the quantities of raw material wastage
- Assessing the quantities of each type of waste
- The suitability of the waste storage areas
- The cost of disposal for different types of waste.

Also see **managing materials** page 18.

The management will reduce waste initially by reducing the quantities ordered (avoid over ordering), ordering lengths of materials to size to reduce off cuts and arranging for delivery of materials at the correct time.

The next phase is to reduce the amount of waste going to landfill. R.M Myers & CO.LTD will aim to minimise the disposal costs (landfill tax) by reusing and recycling wastes generated on site wherever possible.

If possible the waste should be separated and stockpiled. The manager must assess what wastes could be reused. Examples as follows: -

- Concrete – used as aggregate in new concrete
- Excavation spoil – used as fill or landscaping
- Timber – shuttering, hoardings etc.
- Topsoil – landscaping

Transporting of waste

R.M Myers & CO.LTD accepts its responsibility to dispose of waste arising from the project at an environmentally permitted site in line with the **Environmental Protection (Duty of Care) Regulations 1991**.

The site managers will monitor the waste being removed from site using the following check list: -

- Check the copy of the waste carriers' registration document and that it is still valid.
- Check that the waste carrier is authorised to carry that type of waste (hazardous waste etc.)
- The transfers notes and consignment notes should be completed in full and contain an accurate description of the waste.
- Copies of the waste transfer note must be kept for 2 years (3 years if classified as hazardous)

To ensure the waste management company are complying with their duty of care, spot checks will be carried out by following the waste vehicle to the disposal site at least once in every project or once every 50 load if bulk waste removal is taking place, such as demolition.

Noise

Good relations with the people living and working in the vicinity of R.M Myers & CO.LTD operations are of particular importance. The Control of Pollution Act 1974 (Section 60) and the Environmental Protection Act Part III contain specific requirements to control noise from construction sites.

Local authorities are able to serve an abatement notice on any persons who are creating or expected to create noise. As an alternative an application may be made to the local authority for prior consent.

The Environmental Protection Act defines noise emanating from a site which is prejudicial to health as a statutory nuisance. There is no level set for statutory nuisance and the local authority has the power to serve a notice.

General Controls

The first action required is to identify any activity which may create noise, such as vehicles, machinery, construction activity and employees. The following control measures will be used where possible: -

Substitute

- Specify noise reduced plant
- Use bored instead of impact pile driving

Modify the Noise Route

If possible modify the path between the noise generation and the receiver by consideration of:

- Enclosure of the workplace
- Using sound absorbing material (screens)
- Using mufflers and silencers to reduce noise transmitted along pipes and ducts.
- Provision of anti-vibration mountings under machines
- Enclosing the noisy machines or covers around noisy parts
- Using the quietest machinery available.

Noise (continued)

Distance

Increasing the distance between the noise source and the receiver can provide considerable improvement. In the open air sound decreases by 6dB for every doubling of the distance away from the source.

- At 1 metre distance the noise level is 112 dB
- At 2 metre distance this would be 106dB
- At 4 metre distance this would be 100dB
- At 8 metre distance this would be 94dB.

Public Relations

Local residents near to the site should be contacted at an early stage of the construction phase to explain what is going to happen, why it is necessary and the duration.

Consideration should also be given to the timing of the noisy operations. Some activities such as piling, breaking out, demolition, earth moving, scabbling etc cause the greatest problems.

If a complaint is brought to the notice of the site by a member of the public, every effort should be made to resolve the complaint before the enforcing authority is informed.

Any complaints received should be recorded and the contracts manager should be informed immediately.

Noise Checklist

- ✓ Is a noise survey required to ascertain ambient noise levels
- ✓ Has a section 61 notice been applied for if noisy work is expected
- ✓ Has contact been made with the local authority
- ✓ Are the restrictions imposed by local authority being adhered to
- ✓ Has plant been serviced at regular intervals
- ✓ Have noise barriers been provided around noisy operations
- ✓ Is all plant equipped with noise damping
- ✓ Is the quietest available plant being used
- ✓ If appropriate is fabrication being carried out off site
- ✓ Have complaints been reported
- ✓ Have complaints been addressed to a satisfactory conclusion

Vibration

Although high vibration levels are rare over sustained periods they can cause damage to buildings and sensitive equipment such as computers. Low levels can cause nuisance to residents. It is likely that local residents will complain about any perceived vibrations as soon as they become noticeable.

There are three primary aims of R.M Myers & CO.LTD management which are: -

- To avoid causing damage to nearby structures
- To avoid causing annoyance and concerns
- To avoid being falsely accused of causing damage.

Controls

- Evaluate the potential for vibration and thereby damage.
- Monitor conditions before works start. Such as existing cracks in buildings or damage such as broken tiles, loose pipes or cracked plaster
- Inform Neighbours. Informing neighbours of the potential for vibration allows the off-site staff to learn of any particularly sensitive issues that may be time dependent and that may be avoided by limiting hours of work.
- Minimise effects by isolating plant, position plant such as crushers away from sensitive areas. Ensure all plant is maintained.
- Monitor the conditions after the works are completed. (pre-condition survey)

Dust

R.M Myers & CO.LTD recognises that dust, emissions and odours arising from site will annoy neighbours and can even cause health risks at very high concentrations.

Dust for this policy is considered to be any airborne solid matter up to about 2mm in size. Some dust such as limestone is also chemically active.

The following points will be considered by the management team to avoid dust generation: -

Demolition

- Use of enclosed chutes for dropping materials down to ground level.
- Locate crushing plant away from sensitive areas
- Ensure a water bowser is available to suppress dust.

Plant

- Clean the wheels of vehicles leaving the site so that mud does not spread on the surrounding roads
- Ensure that exhausts do not discharge directly to the ground.
- Ensure vehicles carrying a dusty load are covered via a sheet
- ensure vehicles comply with MOT emissions standards

Materials

- locate stockpiles out of the wind if possible
- keep stockpiles to the minimum height
- ensure all dust generating materials transported around site are covered with a tarpaulin
- damp down
- avoid spillage and clean up as soon as possible

Haul Roads

- select suitable haul roads away from sensitive areas
- sweep haul roads regularly
- provide a length of paved road before the exit to the site.
- use a road sweeper on public roads
- limit the speed of vehicles
- damp down

Cutting/grinding

- minimise cutting and grinding on site
- use dust extraction and water suppression on cutting saws
- use water suppression on stihl saws

Energy Consumption

Efficient energy use not only reduces operating costs, but also produces important environmental benefits. Most of the energy use is produced by burning fossil fuels, coal, oil and gas. Burning these fuels produces a variety of pollutants including Sulphur dioxide, nitrogen oxide and carbon dioxide.

Using energy efficiently and thereby reducing pollution is recognised by R.M Myers & CO.LTD . The following measures will be implemented to reduce energy consumption: -

Lighting

- lighting levels will be appropriate for each task
- all lamps will be switched off when rooms are not in use
- all lamps and fittings shall be in a clean condition
- Movement detectors will be considered for appropriate areas

Heating Systems

- All heating systems will be regularly maintained
- Heating pipes and tanks will be insulated
- Heating systems will be isolated when not required
- Unoccupied areas will not be heated unnecessarily

Air Conditioning

- Air conditioning will only be fitted when it is deemed necessary
- Areas must not be overcooled
- The unit will be adequately maintained and cleaned
- The heat exchanger surface should be free of dirt and the air flow unobstructed

General

- Turn off hot and cold water taps completely and report any leaks or drip as soon as possible
- Switch off any appliance which is not being used
- Don't make more photocopies than are actually needed
- Send an e-mail as opposed to paper documentation
- R.M Myers & CO.LTD will display environmental advisory notices around the premises

Environmental Policy Statement

R.M Myers & CO.LTD is committed to the development of environmental solutions and to improve on environmental best practice. R.M Myers & CO.LTD is also committed to minimising its impacts and effects on the local and global environment.

Continual monitoring and reporting will help R.M Myers & CO.LTD achieve its aims and objectives, which are as follows: -

- Undertake environmental assessments on all projects prior to commencement. This will ensure regulatory and local bylaws are complied with.
- Develop practical and coherent plans on how to manage the results of the assessment.
- Liaise with local communities and develop acceptable solutions wherever possible.
- Execute the works to minimise the effects of noise, dust and inconvenience to those affected.
- Actively encourage all employees to consider how to reduce waste, reuse or recycle prior to disposal.
- Recognise the importance of training and updating our employees on environmental best practice.
- Where there is opportunity, aim to influence the client on positive environmental solutions.
- Comply with the legal and other requirements and adopt good monitoring systems to maintain compliance.
- During the project, protect important wildlife habitats and archaeological sites.

Signed: Date:
Director responsible for Environmental Management

Environmental Policy Contents

- **Policy Statement**
- **Contents**
- **Policy Overview**
- **Environmental Legislation**
- **Individual Responsibilities**
 1. **Director**
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- **Ground Contamination**
- **Water**
- **Waste**
- **Transporting Waste**
- **Noise**
- **Vibration**
- **Dust**
- **Energy Consumption**

Policy Overview

R.M Myers & CO.LTD accept that effective environmental management on site requires a team effort. This includes input from the main contractor (principal contractor) and sub-contractors onsite, the contractors' organisation off site, designers, clients and suppliers. To manage this teamwork effectively the **site manager** should follow the steps outlined below. So should the managers of any sub-contractor on site that has the potential to cause environmental impacts through its activities - which applies to all trades and operations.

Step 1 – Identify the environment obligations of the project

- Identify legal obligation
- Identify environmental requirements contained in the project brief, specification or contract documents. This should include a review of any Environment Impact Assessment, Environmental Statement or other client/designer derived assessment.

Step 2 – Identify the environmental risks (including emergencies) particular to the site

- Review relevant documentation identified in Step 1
- Talk to environmental regulators about their concerns for the site at an early stage
- Liaise with clients and designers to establish how they can help identify and overcome potential environmental difficulties.
- Compile a risk register for the site
- During site induction alert all site personnel to the risks associated with the construction on site

Step 3 – Identify environmental responsibilities

- Define the environmental responsibilities of all personnel working on site, including those who are involved in implementing and monitoring initiatives
- Define lines of communication between site personnel, and those responsible for producing the site environmental plan (see below)

Step 4 – Establish an environmental management plan (EMP)

- Information gathered in Steps 1 to 3 can be used to form the basis of an Environmental Management System (EMS).
- The most important features of an EMP is that it is site specific, accessible regularly revised and in constant use

- The site EMP can be used to develop method statements for specific components of work
- Method statements are key documents on site as these will be referenced during the process and will incorporate not only environmental, but also all other requirements e.g. health and safety and buildability

Step 5 – Monitoring and follow up

- A robust monitoring system should be implemented to ensure you are meeting the requirements of your EMP
- All monitoring data should be retained so there is an auditable trail
- Monitoring refers to a wide range of activities, including:
 - Audit reports
 - Maintaining and reviewing training records
 - Chemical analysis of discharges and nearby streams
 - Waste transfer notes
 - Records of dust generation
 - Noise monitoring records.

The management framework

Sub-contractor responsibilities and the supply chain

Sub-contractors and those further down the supply chain need to understand their environmental obligations and ensure they meet them. As with any controls, environmental responsibility can be implemented with incentives or penalties. It is important for contractors and sub-contractors to work together to ensure successful delivery of projects (see checklist below for suggestions on selecting and managing sub-contractors).

Checklist – Selecting and managing sub-contractors

- Sub-contractors should present proof of their past environmental performance along with records of past and pending prosecutions
- Ensure that sub-contractors have a copy of the site EMP before commencing work
- Ensure sub-contractors attend environmental training sessions/inductions
- Ensure sub-contractors are aware of their environmental obligations on the project
- The contract should include requirements to follow good environmental practice
- Audit the performance of sub-contractors during the project.

Environmental Legislation

Below is a list of environmental legislation that is pertinent to R.M Myers & CO.LTD 's activities. R.M Myers & CO.LTD will update the list using the Environment Agency website.

www.gov.uk/government/organisations/environment-agency

- **Environmental Protection Act 1990**

EA Section 33 of the Act states that any person shall not (subsection (1)(a) deposit controlled waste or extractive waste, or knowingly cause or knowingly permit controlled waste or extractive waste to be deposited in or on any land unless an environmental permit authorising the deposit is in force and the deposit is in accordance with the licence and submit controlled waste, or knowingly cause or knowingly permit controlled waste to be submitted, to any listed operation (other than an operation within subsection (1)(a)) that—

(i) is carried out in or on any land, or by means of any mobile plant, and

(ii) is not carried out under and in accordance with an environmental permit.

(c) treat, keep or dispose of controlled waste or extractive waste in a manner likely to cause pollution of the environment or harm to human health.

Section 34 introduces a statutory Duty of Care for all those producing or dealing with waste. As a waste producer, R.M Myers & CO.LTD has regard for this section of the EPA.

Environmental Protection (Duty of Care) Regs. 1991

EA Require anyone who produces, receives, holds, carries, treats or disposes of controlled waste or who, as a broker, has control of such waste, to prepare and retain written descriptions of waste and transfer notes and to furnish copies on request. The transfer notes should contain a description of the waste and all parties in the transaction and be kept for a minimum of two years. Waste should only be transferred to an authorised person. Waste transfer notices are retained by the business and are available for inspection at all times.

The Environmental Permitting Regulations (England and Wales) 2016

Some facilities could harm the environment or human health unless they are controlled. The environmental permitting regime requires operators to obtain permits for some facilities, to register others as exempt and provides ongoing supervision by regulators. It also repealed the Water Resources Act 1991 (most notably sections 85 to 91).

The Waste (England and Wales) Regulations 2014

If your business or organization produces or handles waste, you must take all such measures as are reasonable in the circumstances to prevent waste and apply the waste hierarchy when you transfer waste.

Regulation 13 cover duties in relation to collection of waste.

13.— (1) An establishment or undertaking which collects waste paper, metal, plastic or glass must, from 1st January 2015, take all such measures to ensure separate collection of that waste as are available to the establishment or undertaking in that capacity and are—

(a) technically, environmentally and economically practicable; and

(b) appropriate to meet the necessary quality standards for the relevant recycling sectors.

(2) For the avoidance of doubt, co-mingled collection (being the collection together with each other but separately from other waste of waste streams intended for recycling with a view to subsequent separation by type and nature) is a form of separate collection.

(3) Every waste collection authority must, when making arrangements for the collection of waste paper, metal, plastic or glass, ensure that those arrangements are by way of separate collection.

Regulation 35 covers the transfer note process when controlled waste is transferred.

Hazardous Waste (England and Wales) Regulations 2016 (as amended)

Producers of hazardous wastes are required notify the Environment Agency annually, if producing more than 500 kg of hazardous waste. (Includes fluorescent tubes, IT monitors, inks and toners.). Prior to hazardous waste being moved from premises, a consignment note is completed. These consignment note records must be retained for three years. Quarterly returns on all consignments of hazardous waste must be made to the producer from the consignee.

Landfill Tax Regulations 2016 (as amended)

In October 1996, a tax on waste disposal in landfill sites (Landfill Tax) was introduced in the UK.

A treasury tax of currently £82.60 per tonne on standard waste and £2.60/tonne for inert waste going to landfill is charged.

The landfill directive's overall objective is to supplement the requirements of the Waste Framework Directive and prevent or reduce as far as possible the

negative effects of landfilling on the environment as well as any resultant risk to human health.

Controlled Waste (Carrier of Carriers and Seizure of Vehicles) Regulations 1991 (as amended)

These regulations require you to register if you transport waste. You will need to register as a 'lower tier' or 'upper tier' registration.

Environmental Protection Act Part 2A Contaminated Land The Contaminated Land (England) Regulations 2006

Part 2A provides a means of dealing with unacceptable risks posed by land contamination to human health and the environment, and enforcing authorities should seek to find and deal with such land. The overarching objectives of the Government's policy on contaminated land and the Part 2A regime are to identify and remove unacceptable risks to human health and the environment, to seek to ensure contaminated land is made suitable for its current use and to ensure that the burdens faced by individuals, companies and society as a whole are proportionate, manageable and compatible with the principles of sustainable development.

The regulations provide the statutory framework for contaminated land. LA are required to identify contaminated land within their areas, with "Special Sites" being regulated by the EA. Identified sites are to be cleaned to a "suitable for use" standard, with remediation.

Notices being served on the person who originally caused the contamination, advocating the "Polluter Pays Principle". If this person cannot be found, then the owner/occupier will be held responsible. As a company we are not aware of any contamination to the land.

Environmental Protection Act 1990, Part III: Statutory Nuisance and Clean Air Noise and Statutory Nuisance Act 1993

Enables local authorities and private individuals to take action to secure abatement of nuisances such as noise, odours, dust etc. Concerned with street noise from sources such as vehicles, equipment, machinery and burglar alarms. Also deals with the recovery of expenses incurred by the local authority in abating statutory nuisance.

Control of Pollution (Oil Storage) (England) Regulations 2001

If you store more than 200 litres of oil above ground at an industrial, commercial or institutional site, then these regulations apply. All types of oil are covered by the regulations. Waste oils aren't included as these are regulated by the Environmental Permitting Regulations.

Tanks, drums and containers must be strong enough to hold the contents without leaking or bursting. Oil containers must be placed away from traffic routes. To avoid damage by collision. Secondary containment must be provided to provided containment of oil leaks, this includes its ancillary pipework.

Town & Country Planning (Environmental Impact Assessment) Regulations 2011

These regulations require that before granting “development consent” for projects, including development proposals, authorities should carry out a procedure known as environmental impact assessment (EIA) and produce an environmental statement (ES) for any project that is likely to have significant effects on the environment.

Waste Electric and Electronic Equipment (WEEE) Regulations 2015 (as amended)

These regulations impose obligations on producers of EEE they sell in terms of financing the collection, treatment, recovery, and environmentally sound disposal of WEEE.

Responsibilities

Managing Director

- Must be aware of the companies' legal responsibilities with regard to environmental control and management.
- Appoint a member of staff to have a specific duty to implement the policy and be responsible for environmental operational control.
- Monitor the performance of the environmental appointed person to ensure resources are available and duties are carried out.
- Ensure adequate resources are available to meet the requirements of the Environmental management system, with particular attention paid to environmental legal compliance and prevention of pollution.
- Establish an organisational system to ensure a hierarchy for environmental management is in place.
- Ensure the arrangements section of the policy is communicated to the entire workforce.
- Ensure that environmental legislation is closely monitored to maintain legal compliance.
- Ensure individuals are competent and trained to undertake their role successfully.
- Maintain overall responsibility for the competency and suitability of the management team.
- Monitor the effectiveness of the policy and instigate amendments where appropriate.
- Ensure pre-start meetings include a discussion on environmental aspects assessments.
- Include environmental compliance into the regular health and safety meetings.

Site Managers - Foreman

Site Managers shall be responsible for the overall implementation of the environmental policy and environmental impact assessment controls on their site.

The Site Managers must:

- Make themselves fully aware of the policy and any specific section which is relevant to them.
- Continually assess the environment throughout the project to prevent pollution and reduce the risk of local pollution and note any significant changes.
- Co-operate with all stakeholders' i.e. local residents or local authority, with regards to managing environmental risks.
- Be aware of the companies' legal responsibilities with regard to environmental control and management.
- Assess and monitor the project and all site activities to identify environmental aspects (cause), associated impacts (affect) and controls.
- Ensure meetings include a discussion on environmental issues and control.
- Monitor the performance of environmental control to ensure resources are available and duties are carried out.
- Include environmental compliance into the contractors' health and safety pre-start meetings.
- Ensure all contractors are aware of any issues which must be considered to protect the environment at induction.
- Manage waste on site using the environmental hierarchy of reduce, reuse, recycle and finally waste disposal.
- Check the credentials of the waste management company and make reasonable enquiries to ensure waste is transferred in compliance with their registration and environmental permit.

Site Managers / Foreman - continued

- Ensure a suitable number of skips are available for contract waste and monitor skips for mixing of active and inert waste.
- Ensure waste transfer or consignment notes are accurate.
- Ensure oil is stored within secondary containment systems.
- Ensure spill kits are available for environmental spillages.
- Undertake a post project assessment with the contracts manager to identify improvements which could have been made to that specific project and the policy overall.

Site Workers

- Make themselves fully aware of the policy and request to see any section which may be relevant to their work.
- Take note of any information which is being given to you via tool box talks or induction.
- Report to the manager any breaches of the site rules and any spills which may cause environmental pollution.
- Take action if a spill takes place which could pollute the waterways i.e. absorb oil spills or position an absorbent boom around surface water drains.
- Report to the managers any significant changes to the environment or damaged equipment (leaking hoses etc) to reduce the risk of pollution.
- Co-operate with all managers with regards to improving the environment and follow the system of work developed.
- Be aware of the companies' legal responsibilities with regard to environmental control.
- Follow the principles of good waste management on site using the environmental hierarchy of reduce, reuse, recycle and finally waste disposal.
- Ensure you do not contaminate the waste within skips by mixing the active and inert waste and do not mix non-hazardous and hazardous waste.
- Do not overfill skips, which causes litter and waste to spill onto the carriageway.
- Check waste transfer or consignment notes are accurate and report to the manager any discrepancies.
- Report to the managers any improvements which could have been made to that specific project.

Definitions

Environmental Pollution

Pollution of the environment is taken to mean pollution of the air, water and land from any industrial and commercial activity capable of causing harm to man and other living organisms on the planet.

Environmental aspect – An element of the companies' activities that can interact with the environment. (Diesel bund, excavation, waste management, etc.)

Environmental impact – Any change to the environment from activities which R.M Myers & CO.LTD have control. (Water pollution, air contamination, ground contamination etc.)

Waste – Includes any material which constitutes a scrap material, effluent or other unwanted surplus substance. Waste can then be sub divided into 4 types: -

Inactive waste – covers materials that do not undergo significant physical, chemical or biological reactions or cause environmental pollution when deposited at a landfill under normal conditions. These include uncontaminated soils and rocks, ceramics, concrete, masonry and brick rubble.

Putrescible waste – covers waste that will rot such as food and timber.

Active waste – are those that are not inactive wastes. They include acids, pesticides, wood preservative, oily sludge's, batteries, waste oils, asbestos, timber and plastics, bitumen etc. Some active wastes may also be special wastes. Active waste is subject to a higher rate of landfill tax than inactive waste.

Hazardous Waste – are that are deemed to be dangerous to life, they may be corrosive, reactive, explosive, oxidizing, carcinogenic or flammable. Some of the more common site special wastes include acids, alkaline solutions, oily sludge's, asbestos, waste oils and wood preservatives. The Hazardous Waste Regulations should be referred to for a comprehensive list.

Water Pollution – Pollution of controlled waters; these include watercourses, road drains, surface water gullies and water contained in underground strata.

Pollution means poisonous, noxious or polluting matter, solid matter or any trade sewage effluent. Examples are cement or concrete wash water which are highly alkaline, oil etc.

Definitions (continued)

Air Pollution – Dust, emissions and odours are defined as a nuisance under the Environmental Protection Act. In addition, smoke, fumes and gases from any site or premise may also be a nuisance. The person responsible (principal contractor, contractor etc.) can be required by the local authority to put a stop to the nuisance through an abatement notice. An aggrieved individual may apply to the magistrates for an abatement order. Breach of the notice or order is a criminal offence.

Noise and vibration radiating from the site are also defined as a statutory nuisance and are also covered under the Environmental Protection Act.

Ground Contamination- Contaminated land can be defined as any land which is shown to contain sufficient qualities or concentrations of a substance such as to pose a direct or indirect hazard to man, the environment, or other targets.

Industrial contamination has often migrated beyond the deposition zone, via leachate. Some contaminants date back to the industrial revolution and is often the result of a succession of different industries using the same site; in particular old buildings demolished containing asbestos.

Natural Contamination may be found where the industrial processes are so ancient that they are now considered natural (out washing of old Lead mines, heavy metals such as Cadmium, Mercury in soils)

Establishing the Site

When setting up the site, Contracts and Site Managers will plan the site layout and offices to minimise visual intrusion. In urban areas the site will usually be screened by a suitable, well-constructed hoarding, which will be maintained by the management to reduce fly-posting and graffiti.

Working hours

Site working hours will be established at the beginning of the project to reduce annoyance to the neighbours. On some projects the working hours are defined through contractual agreements or through local authorities who issue Section 60 or 61 notices under The Control of Pollution Act.

Lighting

Site lighting may be used as a deterrent to vandals and thieves. Lighting will be kept to a minimum brightness and located to reduce direct light into other properties. Infra-red lighting will be considered for security where necessary.

Security Measures

- The site boundary will be enclosed using high quality fencing, gates and locks. Where the site has regular public contact such as street and city works solid barriers (hoardings) will be used.
- Managers will avoid where possible the stacking of materials against the boundary fence, to reduce the risk of vandals and thieves access.
- The substances and materials which are potentially hazardous will be secured and fuel outlets will be locked.
- All plant will be secured, keys will be removed and plant will be immobilised when necessary.
- The site manager will consider the positioning of the site cabin to allow a good view of the site and will alert the local police if there are any signs of forced entry.

Establishing the Site (continued)

Managing Materials

The purchasing department and site management team will aim to minimise resource use and reduce the amount of waste sent for disposal by improving the management of materials and components at site level.

Better control will also reduce the likelihood of spillage incidents, contaminated materials from incorrect storage, less damage to building materials due to better storage, all which means less waste of raw materials.

Ordering Checklist

- Order the correct quantity of materials at a time near to when they are needed, therefore reducing storage times. This is a must on sites with spatial limitations.
- Prior to order, check in what form the materials will be delivered so that the correct plant can be arranged.
- Make sure that the delivery is received by a representative of R.M Myers & CO.LTD to supervise the delivery, carry out a quality inspection and to ensure the materials are delivered in the correct place.
- Store materials which are valuable in a secure lock up.
- Store materials away from vehicle movements where possible to reduce the risk of damage.
- Secure lightweight materials to protect them from wind damage.
- Ensure chemicals and hazardous substances are stored to comply with the manufacturer's instructions.

Vehicle Access Routes

R.M Myers & CO.LTD will plan site traffic routes to reduce problems with the local traffic and to ensure safety requirements are complied with in line with HSG 144 Management of vehicles and plant on construction sites.

Local residence will also be considered to reduce the problem of vehicle emissions, noise and the visual intrusion of queuing traffic.

Plans will be drawn up by the site management team to include, each access and egress route (preferably this will be arranged to allow the vehicles to enter and exit the site in a forward direction), the agreed lorry route by the nearest main road, clear unambiguous signage and established banksman for control of movements and unloading.

Checklist

- When ordering materials ensure that the drivers are aware of any traffic restrictions.
- Arrange for deliveries to reduce local traffic congestion (e.g. when working near schools, deliver before 8a.m. or after 9:15a.m.)
- Instruct drivers to switch off engines when waiting to reduce CO₂ emissions.
- Where possible arrange for delivery vehicles to go straight into site without having to queue outside.
- Where possible load and unload vehicles off the highway.
- Plan parking for site personnel vehicles.
- Utilise road sweepers to maintain local roads and reduce contamination, particularly when removing spoil.
- Ensure existing footpaths are maintained in good condition.
- Make good any damage to pavements as soon as possible.

Ground Contamination

Before a development begins all the land should be regarded as being potentially contaminated. The initial responsibility lies with the client, who should carry out a full site investigation, to include soil and water sample analysis and a geotechnical survey.

If contamination is located, then the contaminated area should have a clear boundary marked, usually fenced off to a height of 2 metres with adequate warning signs displayed.

Access to and from the site should be through a hygiene facility and by use of controlled washing systems for vehicles leaving the contaminated site.

Hygiene – must be situated at the most convenient access point to the contaminated area. Boot washes must be located immediately outside the hygiene unit.

The hygiene unit must be laid out to allow staged cleaning. Segregating storage of personal clothes, protective equipment, washing facilities and toilet facilities.

A trough sink must be available allowing cleansing of the forearm. Nailbrushes, soap and disposable towels to be provided. Hot and cold running water must be supplied. Toilets will be located next to the washing area so that the hands must be cleansed before using the facility.

Areas for eating and smoking should not be located in the contaminated area of the site. Such areas should, where possible, be accessible by going through the hygiene unit.

Cleaning of Cabs – The use of positive pressure cabs should be considered to prevent the entry of contaminants, otherwise the cabs on site should be vacuumed at the end of every shift to prevent the build up of contaminants.

A high pressure water jet, wash facility should be provided at the boundary of the contaminated site to wash the wheels, arches and underside of the vehicle when leaving the site. The disposal of such water should be discussed with the local water authority or recycled (recirculated) if possible.

Contaminated Land (continued)

Waste Removal

Sheets should be provided for skips or open top lorries when moving contaminated soils from the site. Sheeting should be carried out within the site. Where necessary a special designated gantry should be available to aid the fitting of sheets. Those involved with sheeting the lorry should avoid contact with the contamination.

Control of dusts – Where considerable quantities of dust will be produced, water sprays should be used to dampen down the dust (tractor with water bowser or water jet which has manual control of the water pressure). This will be necessary to protect not only the workers but the general public. Wind speed limits should also be considered to suspend works if the wind exceeds a certain level (e.g. gusting to 25mph) a wind speed meter will be required to accurately assess.

Personal Protective Equipment – An assessment on the PPE needs must be undertaken to protect workers. The protection usually required would include respiratory, skin hand (gloves) and body (disposable coveralls), foot protection (Wellingtons or boots without laces) and eyes due to contaminated dusts. The normal PPE considerations also apply such as head protection and high visibility clothing.

Site Monitoring – Air monitoring of working positions (particularly in the cabs of excavators) within the hygiene unit and in clean parts of the site should be considered depending on the level of risk posed. This will usually be detailed in the pretender plan or ground survey report. Boundary samples should also be taken to reassure the public.

Any water courses which may be subject to contamination should also be monitored.

Specialists in atmospheric monitoring techniques should be contacted prior to project commencement to identify the type of sampling required.

Contingency Plans

Contingency plans should be drawn up to deal with any residual contamination found on site. The plan must set out actions which should be taken by site management should contamination be found during the construction phase. Such measures may include encapsulating the contamination with an overlay of soil until specialist removal can be instigated.

Water

R.M Myers & CO.LTD accepts that water is a vital resource and aims to manage water properly on site. All site team management are made aware of the controls required to ensure that watercourses are not polluted during the project and that any pollutants getting into the surface water drain or groundwater will end up polluting local water systems.

The site management team will evaluate the potential water pollution risks

- Assess drainage drawings to establish surface water and sewage. And ensure they are in a suitable condition and connected to an outlet.
- Identify local watercourses which have the potential to be polluted.
- Working with groundwater and silty water from excavations.
- Works in contaminated ground and pumping water from excavations.
- Wash out from concreting operations.
- Spillage from chemicals and substances.

The site management team will then identify appropriate control methods (see next section on water – best practice) and pass on the information to relevant workers.

The site manager is then responsible for implementing and monitoring the control methods and initiating any pollution emergency response.

Water – Best Practice

Before starting the project carry out a survey to establish the location of the local streams and mark the position of the surface water drains and foul sewer. On sites with complex drainage it may be prudent to mark the surface water in blue and the foul sewer in red.

Ensure a survey has been undertaken on utility services, gas, water, electricity, telecommunications and drainage.

Water – Best Practice (continued)

Ensure services are protected against damage in particular to the environment, heavy plant tracking over manhole covers, which may cause collapse resulting in sewer blockage.

Disposing of water from site

Construction site run off and all waste waters must be disposed of in accordance with the requirements of the regulatory authorities, for example

- Consent is required from the local sewerage undertaker (Northumbrian Water) to discharge effluent to the public sewer
- Consent is required from the Environment Agency to discharge to a watercourse.

In most cases consent may take time. Therefore, the management team must plan ahead to avoid costly delays at site.

Spillage

Immediately catching the spill is the best emergency response which includes use of bunds around oil storage tanks, use of drip trays on mobile plant.

However, if a spillage occurs then spill kits, sand bags or even sand can be used as a barrier to block off drains or barrier sensitive areas.

Sand and soil which has become contaminated must be disposed of properly.

Vehicle Washing

Where possible vehicles should be washed in a bunded area or discharged to the foul sewer. On sites with a large muck shift a wheel wash system should be acquired which recirculates the water. The contaminated water should then be disposed of by a permitted disposal contractor.

Solid Wastes

Good controls on packaging and skips will reduce the risk of litter blowing into watercourses. Monitoring of local streams and rivers will help the manager quickly identify any problem areas.

Silty Water

A number of options are available as follows: -

- Pumping to grassland/fields – this procedure will require permission from the land owner and the Environment Agency
- Pumping into the foul sewer – this will require permission from the water companies (Northumbrian Water).

Water – Best Practice (continued)

- Pump to a settlement tank – retaining water in an undisturbed state long enough for the suspended solids to settle out. The clean water is then either pumped out or flows out of a discharge point.
- Filtration System – passing silty water through a steel tank fitted with a suitable filter.
- Finally, and the most costly pump into a tanker and dispose of off-site.

Emergency Spill

Ensure that the site manager has details on the procedure to be followed in the event of an emergency. If the spill is significant it should be reported to the Environment Agency on their pollution line 0800 807060.

A typical emergency plan will include:-

7. Employees to immediately report the pollution problem and the pollution source.
8. Stopping the flow of the source and switch off sources of ignition.
9. Avoiding the spread -
 - site drainage plan
 - Stem the flow
 - Dam the flow with spill kits or sand
 - Divert from drainage and watercourses
10. Only use sand or absorbent pads to mop it up
11. Shovel contaminated sand into sacks or skips
12. Dispose of contamination appropriately.

Waste

R.M Myers & CO.LTD aim to manage waste effectively on all its sites. R.M Myers & CO.LTD focuses on the amount of materials that are wasted, the way in which wastes are handled and the best method of disposal.

All managers will aim to effectively manage the waste by initially allocating sufficient space to store the waste. The space allocated will be assessed by identifying what types of wastes are being generated on site. The site manager will monitor the waste by:-

- Assessing the quantities of raw material wastage
- Assessing the quantities of each type of waste
- The suitability of the waste storage areas
- The cost of disposal for different types of waste.

Also see **managing materials** page 18.

The management will reduce waste initially by reducing the quantities ordered (avoid over ordering), ordering lengths of materials to size to reduce off cuts and arranging for delivery of materials at the correct time.

The next phase is to reduce the amount of waste going to landfill. R.M Myers & CO.LTD will aim to minimise the disposal costs (landfill tax) by reusing and recycling wastes generated on site wherever possible.

If possible the waste should be separated and stockpiled. The manager must assess what wastes could be reused. Examples as follows: -

- Concrete – used as aggregate in new concrete
- Excavation spoil – used as fill or landscaping
- Timber – shuttering, hoardings etc.
- Topsoil – landscaping

Transporting of waste

R.M Myers & CO.LTD accepts its responsibility to dispose of waste arising from the project at an environmentally permitted site in line with the **Environmental Protection (Duty of Care) Regulations 1991**.

The site managers will monitor the waste being removed from site using the following check list: -

- Check the copy of the waste carriers' registration document and that it is still valid.
- Check that the waste carrier is authorised to carry that type of waste (hazardous waste etc.)
- The transfers notes and consignment notes should be completed in full and contain an accurate description of the waste.
- Copies of the waste transfer note must be kept for 2 years (3 years if classified as hazardous)

To ensure the waste management company are complying with their duty of care, spot checks will be carried out by following the waste vehicle to the disposal site at least once in every project or once every 50 load if bulk waste removal is taking place, such as demolition.

Noise

Good relations with the people living and working in the vicinity of R.M Myers & CO.LTD operations are of particular importance. The Control of Pollution Act 1974 (Section 60) and the Environmental Protection Act Part III contain specific requirements to control noise from construction sites.

Local authorities are able to serve an abatement notice on any persons who are creating or expected to create noise. As an alternative an application may be made to the local authority for prior consent.

The Environmental Protection Act defines noise emanating from a site which is prejudicial to health as a statutory nuisance. There is no level set for statutory nuisance and the local authority has the power to serve a notice.

General Controls

The first action required is to identify any activity which may create noise, such as vehicles, machinery, construction activity and employees. The following control measures will be used where possible: -

Substitute

- Specify noise reduced plant
- Use bored instead of impact pile driving

Modify the Noise Route

If possible modify the path between the noise generation and the receiver by consideration of:

- Enclosure of the workplace
- Using sound absorbing material (screens)
- Using mufflers and silencers to reduce noise transmitted along pipes and ducts.
- Provision of anti-vibration mountings under machines
- Enclosing the noisy machines or covers around noisy parts
- Using the quietest machinery available.

Noise (continued)

Distance

Increasing the distance between the noise source and the receiver can provide considerable improvement. In the open air sound decreases by 6dB for every doubling of the distance away from the source.

- At 1 metre distance the noise level is 112 dB
- At 2 metre distance this would be 106dB
- At 4 metre distance this would be 100dB
- At 8 metre distance this would be 94dB.

Public Relations

Local residents near to the site should be contacted at an early stage of the construction phase to explain what is going to happen, why it is necessary and the duration.

Consideration should also be given to the timing of the noisy operations. Some activities such as piling, breaking out, demolition, earth moving, scabbling etc cause the greatest problems.

If a complaint is brought to the notice of the site by a member of the public, every effort should be made to resolve the complaint before the enforcing authority is informed.

Any complaints received should be recorded and the contracts manager should be informed immediately.

Noise Checklist

- ✓ Is a noise survey required to ascertain ambient noise levels
- ✓ Has a section 61 notice been applied for if noisy work is expected
- ✓ Has contact been made with the local authority
- ✓ Are the restrictions imposed by local authority being adhered to
- ✓ Has plant been serviced at regular intervals
- ✓ Have noise barriers been provided around noisy operations
- ✓ Is all plant equipped with noise damping
- ✓ Is the quietest available plant being used
- ✓ If appropriate is fabrication being carried out off site
- ✓ Have complaints been reported
- ✓ Have complaints been addressed to a satisfactory conclusion

Vibration

Although high vibration levels are rare over sustained periods they can cause damage to buildings and sensitive equipment such as computers. Low levels can cause nuisance to residents. It is likely that local residents will complain about any perceived vibrations as soon as they become noticeable.

There are three primary aims of R.M Myers & CO.LTD management which are: -

- To avoid causing damage to nearby structures
- To avoid causing annoyance and concerns
- To avoid being falsely accused of causing damage.

Controls

- Evaluate the potential for vibration and thereby damage.
- Monitor conditions before works start. Such as existing cracks in buildings or damage such as broken tiles, loose pipes or cracked plaster
- Inform Neighbours. Informing neighbours of the potential for vibration allows the off-site staff to learn of any particularly sensitive issues that may be time dependent and that may be avoided by limiting hours of work.
- Minimise effects by isolating plant, position plant such as crushers away from sensitive areas. Ensure all plant is maintained.
- Monitor the conditions after the works are completed. (pre-condition survey)

Dust

R.M Myers & CO.LTD recognises that dust, emissions and odours arising from site will annoy neighbours and can even cause health risks at very high concentrations.

Dust for this policy is considered to be any airborne solid matter up to about 2mm in size. Some dust such as limestone is also chemically active.

The following points will be considered by the management team to avoid dust generation: -

Demolition

- Use of enclosed chutes for dropping materials down to ground level.
- Locate crushing plant away from sensitive areas
- Ensure a water bowser is available to suppress dust.

Plant

- Clean the wheels of vehicles leaving the site so that mud does not spread on the surrounding roads
- Ensure that exhausts do not discharge directly to the ground.
- Ensure vehicles carrying a dusty load are covered via a sheet
- ensure vehicles comply with MOT emissions standards

Materials

- locate stockpiles out of the wind if possible
- keep stockpiles to the minimum height
- ensure all dust generating materials transported around site are covered with a tarpaulin
- damp down
- avoid spillage and clean up as soon as possible

Haul Roads

- select suitable haul roads away from sensitive areas
- sweep haul roads regularly
- provide a length of paved road before the exit to the site.
- use a road sweeper on public roads
- limit the speed of vehicles
- damp down

Cutting/grinding

- minimise cutting and grinding on site
- use dust extraction and water suppression on cutting saws
- use water suppression on stihl saws

Energy Consumption

Efficient energy use not only reduces operating costs, but also produces important environmental benefits. Most of the energy use is produced by burning fossil fuels, coal, oil and gas. Burning these fuels produces a variety of pollutants including Sulphur dioxide, nitrogen oxide and carbon dioxide.

Using energy efficiently and thereby reducing pollution is recognised by R.M Myers & CO.LTD . The following measures will be implemented to reduce energy consumption: -

Lighting

- lighting levels will be appropriate for each task
- all lamps will be switched off when rooms are not in use
- all lamps and fittings shall be in a clean condition
- Movement detectors will be considered for appropriate areas

Heating Systems

- All heating systems will be regularly maintained
- Heating pipes and tanks will be insulated
- Heating systems will be isolated when not required
- Unoccupied areas will not be heated unnecessarily

Air Conditioning

- Air conditioning will only be fitted when it is deemed necessary
- Areas must not be overcooled
- The unit will be adequately maintained and cleaned
- The heat exchanger surface should be free of dirt and the air flow unobstructed

General

- Turn off hot and cold water taps completely and report any leaks or drip as soon as possible
- Switch off any appliance which is not being used
- Don't make more photocopies than are actually needed
- Send an e-mail as opposed to paper documentation
- R.M Myers & CO.LTD will display environmental advisory notices around the premises