



## **ENVIRONMENTAL POLICY**

### **Environmental Policy Statement**

In reflecting the Environmental Policy of the Partners of Graham Turner Commercial Interiors, the company recognises it has a duty to ensure that its activities are conducted in a manner, which reflects a commitment to protect the environment.

*It is the policy of Graham Turner Commercial Interiors to:*

- Comply with all legislation, regulations and Codes of Practice on environmental matters relevant to our operations.
- Minimise environmental disturbance in all our activities.
- Make efficient use of natural resources, minimising waste and conserving energy and water.
- Incorporate into commercial decision making an awareness of environmental factors. This applies particularly when tendering for, and starting, new contracts.
- Promote environmental awareness and understanding amongst all staff so that their working activities are carried out in accordance with legislation. Company policy and go environmental practices.
- Endeavour to ensure that our contractors, sub-contractors and major suppliers are aware of and apply environmental standards compatible with our own.
- Regularly review the policy to ensure that the objectives set are being met; look for continuing improvements in our environmental performance.
- Partner has developed and will implement this Policy.
- Consult with Nexus Business Support on all matters.

**Graham Turner**  
**Partner**  
**January 2009**

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## **2.0 ENVIRONMENTAL RESPONSIBILITIES**

### 2.1 STATEMENT OF RESPONSIBILITIES

- 2.1.1 The Company Partner Graham Turner will be responsible for the content of the policy and its periodic updating and also for its operation throughout the Company. With advise from Nexus Business Support Ltd.
- 2.1.2 The framework of devolved responsibility will follow the line management Structure.
- 2.1.3 The Company will develop and encourage environmental training of employees at all levels.

## **3.0 ENVIRONMENTAL SPECIFIC POLICIES AND PROCEDURES**

### 3.1 WASTE MINIMISATION

To ensure that Graham Turner Interiors plays its part in helping to achieve reduction in the proportion of Controlled Waste going to landfill the following procedures are to be considered, at tender stage and during construction.

- 3.1.1 Planning and Contract Procedures to be followed;
  - (a) Materials produced/ generated, unless contaminated should be considered to have a commercial value and therefore be within the commercial cycle and the chain of utility.
  - (b) Take care of new materials brought onto site to prevent damage. The waste factor in the Construction Industry is estimated at 10%.
  - (c) Devise construction methods that reduce the production of materials.
  - (d) Educate staff on need to minimise waste.
  - (e) Establish procedures to measure waste as a first step in setting waste reduction targets.
  - (f) Improve housekeeping.
  - (g) If materials are found to have no immediate or untreated value the procedures specified in Section 3.2 must be followed.
  - (h) Disposal of liquid waste is included in Section 3.3 - Protection of Controlled Waters.
  - (i) All site based employees and sub-contractors are to be informed of the procedures in force for the reduction and disposal of waste.

## **3.0 ENVIRONMENTAL SPECIFIC POLICIES AND PROCEDURES**

### 3.2 TRANSPORT AND DISPOSAL OF CONTROLLED WASTE

#### 3.2.1 Introduction

The Controlled Waste (Registration of Carriers and Seizure of Vehicles) Regulations 1991 (amended).

It is a criminal offence for anyone to transport controlled waste without being registered with The Environment Agency. Controlled waste includes industrial waste which encompasses construction and demolition waste.

- i.e. As dug and demolition spoil, waste and unwanted surplus materials, asphalt plantings packaging, worn out plant and equipment, scrap metal.

The Company is not registered with the Environmental Agency so any waste transported in all Company and Hired In plant and vehicles is illegal.

### 3.2.2 Environmental Protection Act 1990 (EPA 90) Waste Management Licensing Regulations 1994 Waste Management - The Duty of Care - A Code of Practice

The introduction of an explicit Duty of Care is the most significant aspect of the EPA90 as far as the waste producer is concerned.

Section 34 imposes a 'Duty of Care' on holders of controlled waste. Anyone producing, transporting or disposing of controlled waste is a 'holder' of the waste.

A breach of Duty of Care is a criminal offence.

The Company is under a 'Duty of Care' if it suspects that the waste is being disposed of illegally. Therefore, only sub-contractors and waste carriers who can demonstrate compliance with the law should be employed, i.e. they should produce an original or official copy of their registration certificate (not photocopy) before starting work.

#### **The Duty of Care also includes:-**

- (a) Preventing any other person from illegally treating, keeping, depositing or otherwise disposing of the Waste,
- (b) Preventing the escape of waste,
- (c) On transfer of the waste to ensure that:
  - (i) Transfer only occurs to an authorised person or for authorised transportation.
  - (ii) Transfer is accompanied by a written description of the waste sufficient to enable others to avoid illegal disposal see (a) above, and therefore contravention of the Duty of Care.
- (d) Keeping records, which have to be retained for two years?

#### **Authorised persons are:**

- (a) Waste Collection Authorities
- (b) Holders of waste management licences
- (c) Carriers of Controlled Waste registered under the Control of Pollution (Amendment) Act 1989 or carriers who are exempt from the registration requirements
- (d) Scottish Waste Disposal Authorities
- (e) Persons exempt from waste management licensing

### 3.2.3 Exemptions under Waste Management Licensing Regulations 1994

To encourage the reuse and recycling of waste, many reclamation and recycling activities which are not seen as a threat to human health or the environment have been exempt from licensing.

**Construction activities exempt are as follows:**

**WMLR94**  
**SCHEDULE 3**  
**EXEMPTIONS**

<b><u>Route/ Activity</u></b>		<b><u>Material</u></b>
<b>Storage</b>		
If used in there existing state i.e. (without treatment)	Para 17	Waste Items
If suitable for future use on site	Para 19	Demolition, construction or tunnelling waste, including road planning's
<b>Spreading</b>		
If beneficial to agricultural or ecological improvement	Para 7	Soil, waste wood etc.
Land improvement	Para 9	Soil, rock, sludge etc arising from construction or demolition work
<b>Recycling</b>		
Manufacture of products from including road stone or aggregates	Para 13	Material which arises from demolition, construction & tunnelling work
Crushing, grinding or other size reduction	Para 24	Bricks, tiles or concrete
<b>Burning</b>		
If burnt on land where plant is produced	Para 30	Wood, bark or other matter

## NOTES

The following conditions apply:

1. The waste is recovered or disposed of without endangering human health and without using processes or methods which could harm the environment and in particular without
  - (i) Risk to water, air, soil, plants or animals; or
  - (ii) Causing nuisance through noise or odours; or
  - (iii) Adversely affecting the countryside or places of special interest.
2. The exempt activity must be registered with the Environment Agency before the activity starts.
3. Some activities require planning permission.
4. Time limits and quantities apply to some activities.
5. The Partner Graham Turner must be consulted when any exemption is being considered.

### 3.2.4 Contractual Arrangements - Examples of Compliance

Subject to the foregoing the following options apply:

- (a) If the Company sub-contracts the disposal of waste it is under no special duty of care to check on the final destination of the waste but a Registered Carrier MUST be used (see Section 3.2.2 above).
- (b) If the Company sub-contracts both the excavation and disposal of waste to a single sub-contractor then it is under no special duty of care in either checking the transfers of waste or of checking the final destination.
- (c) If the Company sub-contracts the excavation and disposal separately then again it is not under the duty of care because it is not the holder of the waste.
- (d) If the Company is carrying the waste it has a duty of care to see that the transfer of the waste is to another registered carrier or a holder of a waste management licence.

Further information is given in Waste Management - The Duty of Care, A Code of Practice.

A breach of the duty of care is an offence under the Environmental Protection Act although a breach of the Code is not. However, the Code is admissible as evidence in court and can have the effect of being persuasive regarding actions from the duty of care.

### 3.2.5 The Hazardous Waste Regulations 2005

These Regulations establish a criteria under which a material or object is determined as Special Waste. They require the Environment Agency to be notified by consignment note of movements of special waste.

#### (a) Definition of Hazardous Waste

Hazardous waste is defined as any controlled waste listed in Part 1 of Schedule 2 of the Regulations.

These are the most dangerous wastes and can include anything, which is hazardous, toxic, explosive, corrosive, infectious and flammable or otherwise potentially harmful and is being discarded.

Typically the following are regarded as displaying these properties which would classify them as Hazardous waste:

- Acids
- Oily sludge's
- Batteries
- Pesticides
- Pharmaceutical compounds
- Waste oils (hydraulic, engine, gear, lubricating)
- Fly ash
- Industrial solvents
- Alkaline solutions
- Wood preservatives
- Photographic chemicals
- Asbestos
- Medicinal wastes
- Waste tyres
- Discarded vehicles

#### (b) Hazardous waste (duty of care)

It is envisaged that all hazardous Wastes produced and identified by Mac surfacing Limited activities will be handled by a registered hazardous waste carriers.

If Graham Turner Interiors identify Hazardous waste while undertaking any activity on a project they will inform either the client or principle contract immediately.

Works will be suspended until specialist Hazardous waste consultant or client has been consulted. Graham Turner Interiors will only restart works when instructed that it is safe to do so, by either the client or the specialist Hazardous waste consultant.

#### (c) Informing the Client and Principle contractor

The Hazardous Waste Carrier will provide all the paperwork, for the correct disposal of waste and copies of all the relevant, transfer notes ,waste carriers licences and Exemptions and waste

Management licences will be held for minimum period of at least 5 years at Mac Surfacing limited head office.

## 3.3 PROTECTION OF CONTROLLED WATERS

### 3.3.1 Introduction

There are essentially three methods used to obtain water, which we drink, bathe in, cook with and use in processes and in the manufacture of a whole range of products and these are:

- i) Main river abstraction;
- ii) Collection in reservoirs; and
- iii) Abstraction of groundwater from boreholes.

Groundwater forms that part of the natural water cycle which is present within underground strata (aquifers). It is out of sight and often out of mind.

There is strict legislation to ensure that construction activities do not pollute these waters (see paragraph 3.3.6).

### 3.3.2 Operations that may Pollute Ground Water and Surface Water

- (a) Penetration unto aquifers by construction operations such as piling works, ground investigations, deep excavations permitting movement of potential pollutants.
- (b) Disturbance and removal of and construction within contaminated ground.
- (c) Activities causing hydrogeological changes and possible transfer of contaminated groundwater such as ground improvements, major excavations, pumping and dewatering.
- (d) Disposal and treatment of waste from construction and other operations such as the use of septic tanks, soakaways, settling ponds, material processing, etc.
- (e) Ground contamination from material and fuel storage and transfer, maintenance work especially in sensitive areas, leakage from oil tanks and valves.
- (e) The use of potential contaminants such as chemicals, hydrocarbons, etc.
- (g) Excavation works, dredging in existing watercourses.

### 3.3.3 Common Activities that can Cause Pollution

- (a) Run off from hardstandings, building and plant yards.
- (b) Vandalism and theft on site.
- (c) Carrying out concreting operations near or in watercourses.
- (d) Washing cut concrete mixing plant or cleaning ready mix concrete lorries.

- (e) Run off from site roads.
- (f) Overflow from wheel wash facilities.
- (g) Carrying out overpumping or other pumping operations.

NOTE; Under Section 85 of the Water Resources Act 1991 it is an offence to discharge trade or sewage effluent into controlled waters without the prior consent of the Environment Agency.

#### 3.3.4 Operations that may affect Groundwater Flow

Operations which affect groundwater flow may increase the seriousness of pollution of groundwater and surface water by, for example, reducing the volume of water so that the concentration of a pollutant is increased. The following are examples of operations which may affect groundwater flow.

- (a) All forms of groundwater abstraction or pumping operations (i.e. deep excavations)
- (b) Construction of highways, railways, cuttings and tunnels.
- (c) Field drains and other surface water drainage systems that will intercept recharge water.
- (d) Paving large areas.
- (e) Activities and installations which may connect naturally occurring aquifers, e.g.
  - Borehole construction and exploration drilling
  - Piling
- (f) Activities such as mining, the construction of highways and railways with their associated tunnels, cuttings and borrow pits, the construction of impermeable barriers, piling and borehole drilling can, in certain circumstances, cause problems by draining groundwater from aquifers, diverting groundwater, or causing two aquifers to interconnect.

#### 3.3.5 Working on Contaminated Land

Details of contamination levels should be contained in the Pre-start Health and Safety Plan. If they are not, the Planning Supervisor should be asked for details.

Particular care is needed to avoid pollution of water resources when operating on contaminated land.

Contaminated sites may include land currently or previously used in connection with the following activities and may contain a variety of harmful substances:

- Coal-gas manufacture
- Landfilling and other waste disposal activities including waste lagoons

- Chemical manufacture
- Heavy industry
- Mining
- Sewage treatment
- Metal refining
- Oil refining and hydrocarbon storage

It may often be necessary for an investigation to be carried out to discover the nature and extent of contamination of a site so that any operations to be carried out on that site can be undertaken in a way which minimises the potential dangers to the purity of groundwater and surface water.

### 3.3.6 Discharge Legislation

- (a) The Water Resources Act 1991 regulates discharges to inland waters as distinct from drainage from trade premises to sewers. Discharge is permitted only with the consent of the Environment Agency, subject to conditions.

Under Section 85 of the Water resources Act 1991 it is an offence to cause or knowingly permit without consent any direct discharge of any poisonous, noxious or polluting matter (including any trade or sewage effluent) to enter any stream or controlled water.

- (b) The Water Industry Act 1991 controls discharge to sewers.

Under Section 118 of this Act an occupier of trade premises is committing an offence if he discharges trade effluent without the consent of the sewerage undertaker.

- (c) License or Consent

When a license or consent is granted it will specify the levels of pollution that must not be exceeded, and once consent is issued the conditions specified will be monitored by the authority concerned. Conditions that will be set by the Environment Agency will probably be impossible to meet, but councils, etc. are likely to be co-operative.

Liquid wastes are best dealt with by the disposal to sewers to be treated by the sewage treatment process. The Environment Agency encourages this rather than using watercourses.

#### NOTE

Some gullies discharge to a watercourse and not to a sewer.

### 3.3.7 Contract Planning Procedures

- (a) At tender stage, the legal disposal of liquid waste must be considered.
- (b) Disposal methods are to be raised at the Pre-Contract Meeting.

- (c) The advice and approval of discharge is to be obtained from the appropriate authority as soon as possible.
- (d) Copies of any licences/consents are to be sent to Head Office
- (e) Discharges which exceed the permitted levels should be reported to the controlling authority immediately to ensure limitation of contamination. This applies particularly to accidental discharges, e.g. fuel oil.

### 3.3.8 Procedures for the Safe Storage and Disposal of Potential Pollutants

Many substances stored at depots and on site represent potential sources of pollution and possible causes of prosecution.

Leakage of degreasing fluids, anti-fouling and other paints, fuels, oils, generator fuels, bitumen products and damaged batteries must be avoided.

All site based employees and sub-contractors are to be informed of the procedures adopted to prevent the pollution of Controlled Waters.

- (a) Oil and Chemicals
  - i) All fuel and chemical storage must be sited on an impervious base within a bund and be secure. The bund must be impermeable to the material stored and of sufficient capacity to contain 110% of the volume of the largest tank.
  - ii) Delivery and refuelling must be strictly controlled and together with any oil storage tanks should be confined to a location remote from any watercourse or drain.
  - iii) Leaking oil drums must be removed from site immediately.
  - iv) All valves and trigger guns should be sited within the bund and be resistant to unauthorised interference and vandalism, and should be turned off and securely locked when not in use.
  - v) Water/oils, etc. in the bund must be pumped out and disposed of as waste and not allowed to drain.
  - vi) Contents of tanks should be clearly marked.
- (b) Static Plant
  - i) To prevent spillage during fuelling and contamination from drips a drip-tray is to be provided.
- (c) Silt, Cement and Grout

- i) The washout from concrete/grout mixing plant or the cleaning of ready mix concrete Lorries must not be allowed to flow into any drain or watercourse.
  - ii) Site roads must be regularly scraped and kept free from deposits in order to prevent silt, oil or other materials entering any drain or watercourse.
  - iii) Any lorry wheel wash facility should be securely constructed with no overflow and the effluent should be contained for proper treatment and disposal.
- (d) Disposal at end of Contract

The following rules are to be applied when considering return to the Depot:

- i) Oil/diesel tanks are to be empty.
- ii) Bunds are to be empty.
- iii) Opened or partly filled cans/tins/drums are to be disposed of by site using the correct "waste route
- iv) LPG/ Oxygen/ Acetates/ Inert gas cylinders are not to be returned to the Depot but returned to the owner of the cylinder.
- v) Other full containers that are clearly marked with their contents can only be returned to the Depot after obtaining the express permission of the Plant Manager.

### **3.4 COMPANY POLICY AND PROCEDURES FOR REDUCING IMPACT ON THE ENVIRONMENT**

The following procedures are to be implemented:

#### **3.4.1 Protecting Resources/Recycling**

3.4.2 The use of recycled products should be used where possible, e.g. brick hardcore /cold planings, rather than virgin crushed rock; pulverised flyash PFA, as a cement replacement.

Clients will be asked to use recycled products or those utilising renewable sources where possible, e.g. timber from renewed/managed forests, products as above.

Site offices will endeavour to recycle paper and bottles using local paper/ bottle banks or charities. The use of recycled paper will be encouraged.

#### **Vehicles/Plant**

Where possible all Company vehicles will be fitted with catalytic converters or be converted to run on lead free petrol.

Drivers should maximise fuel economy by careful driving.

Mileage of all staff vehicles is recorded and monthly results sent to Head Office who will introduce savings when appropriate.

Plant should be switched off when not in use.

#### 3.4.3 Saving of Electricity and other Resources

Good housekeeping measures should be employed at all work locations such as:

- (a) Switching off lights.
- (b) Turning down heating and putting on more clothes rather than sitting in shirtsleeves.
- (c) Attending to leaking taps.

#### 3.4.4 Sub-Contractors and Suppliers

Sub-contractors and suppliers are to be encouraged to follow good environmental practices and follow the policy and procedures of Mac Surfacing Limited.

The following wording should be included in orders to all sub-contractors and suppliers.

Sub-contractors/ suppliers are required to carry out their activities in a manner which complies with Environmental Legislation and protects the environment. (add for sub-contractors only) In particular they will be required to satisfy Mac Surfacing Limited that they and their agents comply with the provisions of the Controlled Waste (Registration of Carriers and Seizure of Vehicles) Regulations 1991 and Section 34 of the Environmental protection Act 1990.

In addition while on site they are to follow the procedures laid down in Mulcair Limited's Environment Policy and Procedures Document.

#### 3.4.5 Environmental Reporting

Activities within the Company which affect the environment will be monitored by an external Health safety and Environmental Consultant.

Environmental matters will be included with the existing arrangements for reporting on Safety.

Improvement targets will be set annually.

This policy will be reviewed annually by the Directors

### 3.5 NUISANCE CAUSED BY SITE OPERATIONS

The Environmental Protection Act 1990 lays down a number of conditions that would constitute a statutory nuisance.

These "nuisance conditions" may come to light as a result of Local Authority inspections or more likely from a complaint to the Local Authority by a member of the public.

The following are a list of "statutory nuisance conditions" that generated:

- |                 |                          |
|-----------------|--------------------------|
| 1. Smoke        | 4. Smells                |
| 2. Fumes or gas | 5. Noise                 |
| 3. Dust         | 6. Accumulation of waste |

But only if prejudicial to health or a nuisance.

To ensure that our site operations are carried out in a manner that will reduce the chance of a nuisance charge, the following must be considered and Site Specific Procedures establishing where necessary. These procedures may need to be agreed with the Client.

#### 3.5.1 Control of HGV Traffic

The impact on the community of HGV traffic to and from the site will be controlled by the use of prescribed routes perhaps agreed with the Local Authority and other appropriate bodies and routes sign posted accordingly.

#### 3.5.2 Control of Mechanical Noise

Wherever continuous pumping of water is necessary, electrical pumps operated off a main supply will be used, provided that a supply of the appropriate location is feasible. Other plant working continually should be silenced and where necessary be screened.

#### 3.5.3 Limiting Periods of Noise and Disturbance

The impact on the community of noise and general disturbance from on-site operations may need to be controlled by restricting the operation of machinery to the following time periods: 8.00AM -6.00 PM, Monday to Friday.

#### 3.5.4 Limiting Dust Pollution

The impact on the community from dust from on-site operations can be controlled by the use of dust suppressant water sprays (where this is feasible) and tarpaulin or other suitable material for covering lorries whose loads are likely to create a nuisance.

#### 3.5.5 Protection of Wildlife

Certain areas in the close vicinity of the works may contain wildlife habitats. Prior to the commencement of work, site staff will liaise with the Resident Engineer and his staff in agreeing protective measures. Sites designated as Sites of Special Scientific Interest (SSSIS) are particularly vulnerable.

### 3.5.6 Efficiency and Control of Emissions

All vehicles used on site or to haul to and from the site will be regularly serviced to ensure both fuel efficiency and that exhaust emissions will as a minimum be within legal limits.

### 3.5.7 Reduction of Visual Impact

Site compounds will be kept clean and not an eyesore. Temporary earthwork bunds may have to be considered.

Signed .....

Dated .....