



**FSG Property Services Ltd**



**Unit 9, Avant Business Center  
Third Avenue, Denbigh West  
Bletchley, Milton Keynes  
MK1 1DR**

## **Environmental Procedures Manual**

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# **Environmental Policy Statement**

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## Environmental Policy Statement

### 1. Introduction

FSG Property Services Ltd recognises its responsibility to minimise any potential adverse environmental impact of our operations and is committed to up-holding its duties as a good and responsible organisation for the greater benefit of its customers, employees and the general public.

This environmental policy forms part of our overall health, safety and environmental policy.

### 2. Policy statement

The Company will take a pro-active and balanced approach to managing its business activities in an environmentally responsible way.

Our commitment is to;

- ◆ Ensure that all applicable legislation, regulations and codes of practice are adhered to on all sites and at our works.
- ◆ Developing a culture in which protection of the environment is a common objective shared with clients, contractors, suppliers and employees.
- ◆ Provide suitable training to all our employees and self employed persons to raise their awareness of all environmental matters and to enable them to work in an environmentally friendly way at all times.
- ◆ Avoid wastage of materials, water and energy by paying careful attention to their use.
- ◆ Always seek to use wherever possible materials from renewable sources and recycled or recyclable materials.
- ◆ Produce products that minimise pollution during their manufacture and erection.
- ◆ Minimise the use of raw materials and waste during the manufacture and erection of our products.
- ◆ Have due regard for all natural features, vegetation and the welfare of wildlife sharing our work sites.
- ◆ Plan carefully to prevent pollution and minimise environmental disturbance as a result of our activities.
- ◆ Reduce as far as possible the production of noise, vibration, dust and other emissions that could affect our neighbours during our work activities
- ◆ Minimise the use of paints that contain solvents and lead.
- ◆ Use biodegradable chemicals wherever possible.
- ◆ Recycle as much waste as possible minimising the amount of materials sent to landfill or for incineration.

This policy will be reviewed annually or whenever a significant change occurs.



Jon Lennox      Managing Director

31 January 2015

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## **Environmental Management System**

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## Environmental Management System

### 1. Introduction

FSG Property Services Ltd carries out property maintenance for HA's and LA's in the public sector focussing on projects, voids, decent homes modernisation, kitchen and bathroom refurbishments, disabled adaptations and small building works. It specialises in roofline works incorporating re-roofs, fascias, soffits and rainwater goods renewals and installations to new or existing buildings and the design and installation of bespoke aluminium cladding and rainwater systems in the private, public and commercial sectors. Green Deal works are undertaken in and on properties for all sectors of the community and includes cavity wall insulation, loft insulation, solar PV and thermal installations and other renewable energy technology installations.

Customers cover a very wide range including individual property owners, local authorities, housing associations, house builders, main contractors and other owners or providers of all types of buildings. Work on existing buildings involves the taking down removal and safe disposal of existing roofline and rainwater goods together with any other items or materials removed in the course of refurbishing properties internally and externally such as kitchen units and fittings and sanitary ware from bathrooms.

All sites are surveyed before tendering or commencing work so the environmental issues can be identified and appropriate action planned to ensure the objectives detailed in the Environmental Policy are met and that all relevant legislation is complied with.

The Company's activities are not likely to have a significant effect on the environment however the following environmental management system has been set up to ensure the best environmental practices are used.

The Company is committed to a policy of continued improvement in all its activities with particular emphasis on environmental matters.

### 2. Objectives

Our objectives for protecting the environment so far as is reasonably practicable are;

- ◆ To reduce waste and the consumption of resources (materials, fuel and energy).
- ◆ Reduce or eliminate the production of polluting releases into the environment.
- ◆ Design products and services in such a way as to minimise their adverse environmental effects in production, use and disposal.
- ◆ Control the environmental effects of raw material sourcing.
- ◆ Minimise the adverse environmental effects of new developments through strategic planning.
- ◆ Work towards the achievement of sustainable development.

The management will, wherever possible, set quantifiable environmental targets.

### 3. Planning the use and disposal of materials

#### 3.1 Existing buildings

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The surveyor will carefully examine the structure of any existing building that is to be up-graded to identify what materials are to be removed, how they are to be handled and disposed of. Examples of such materials are;

- ◆ Wood – painted or treated – often suffering from decay or insect infestation.
- ◆ Ferrous metals – cast iron guttering & downpipes, steel brackets, baths, sinks, fastenings etc.
- ◆ Plastic materials – UPVC, ABS.
- ◆ Aluminium.
- ◆ Copper from old water pipe work, storage tanks etc.
- ◆ Asbestos cement sheets, moulded rainwater goods, other ACM's.
- ◆ Roofing felt - often in bad condition.
- ◆ Old sealing materials of uncertain composition.
- ◆ Brick & cement rubble.

The presence and state of all such materials will be noted on an inspection report (Form Ref ESR 01, Environmental Survey Report – Existing Properties) so that appropriate planned removal and disposal can be dealt with. Priority will always be given to removal techniques that are safe and have the least impact on the environment. Wherever possible all materials removed will be sent for recycling. Only materials that cannot be recycled will be disposed of to landfill which is regarded as a last resort.

### 3.2 New and cleared existing buildings

The new materials to be used will be defined following the specification agreed with the client. The disposal of the following will be planned with priority being given to recycling at all times;

- **Off-cuts of;**
  - Plastic materials
  - Aluminium
  - Ferrous metals
  - Copper
  - Wood
  - Under cloak materials
  - Other recyclable material e.g. brick & cement rubble

- **Paper & packaging materials**

These types of materials that are in good condition and will be recycled

- **Used containers for;**

- Mastics & sealants
- Paint

These types of materials that are not generally recyclable will be disposed of according to the maker's instructions.

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The planned requirements of all materials and their ability to be recycled will be noted on an inspection report (Form Ref ESR 02, Environmental Survey Report – New Build & Replacement Materials). This will allow for planned removal and disposal of the projected volumes of the identified waste products accordingly.

#### 4. Waste disposal

The disposal of all waste will be carefully planned as detailed in 2 above with priority being given to minimising waste and to recycle as much as possible. All waste is to be segregated according to its composition, biodegradability and ability to be recycled.

##### 4.1 Recycling

- ◆ All materials suitable for recycling will be separated and stored in appropriate containers ready for recycling.
- ◆ Materials will be removed from site usually on a daily basis and will be taken back to the depot for storage and ultimately, collection by an approved Waste Disposal Contractor. The company has a Waste Carriers License and a copy is to be issued to all operatives to hold in their vehicles to present to legal authorities when requested.
- ◆ When working on sites, recyclable materials will be placed in designated bins provided by the main contractor.
- ◆ All recyclable waste will be disposed of to suitable waste contractors and records of the transactions will be kept. All Waste Transfer Notes are to be handed to the Logistics Manager at FSGPS Ltd office.
- ◆ Where possible recyclable materials will be sold to off-set the cost of collection, storage and disposal.

##### 4.2 Non-recyclable waste

This will be disposed of by sending for landfill, incineration, or other approved methods as appropriate for the materials involved and is regarded as the last resort method of dealing with waste.

A list of current recycling and waste disposal contractors is included in **Annex A**.

#### 5. Purchasing policy

##### 5.1 Materials

Our policy is to specify the best and most appropriate materials for the work in hand having due regard to the individual client's specification.

Details of our purchasing policy are;

- To specify materials which have the best practicable environmental performance consistent with acceptable performance and cost to the contract.

Account will be taken of;

- ◆ Using renewable raw materials so as not to deplete scarce resources
- ◆ Use minimal energy, water etc in their production

- ◆ Ability to be recycled easily and at reasonable cost and with minimum energy input
- ◆ There is a viable market for the recycled material
- ◆ Containing non-toxic ingredients as far as possible
- ◆ Present minimum hazards to the users and others coming into contact with it
- ◆ Have a long service life

Suppliers of all materials will be required to provide as much information as possible regarding the environment issues concerning the production, use and disposal of their products.

The company will always seek the most environmentally friendly materials and products that are offered by the market consistent with acceptable performance and cost.

### 5.2 Tools, Plant and Equipment

When selecting these items the following matters will be taken into account along with performance, price availability etc;

- ◆ Energy performance
- ◆ Noise
- ◆ Vibration
- ◆ Dust and emission control
- ◆ Types of consumable materials involved e.g. lubricants, filters, cleaning & maintenance

Manufacturers will be required to supply performance details of all such items so that it can be taken into account when purchasing new items.

## 6. Working Practices

When planning the work the environmental issues surrounding working practices will be taken into equal account with other important matters to ensure the work is carried out safely and efficiently.

Site specific method statements are to reflect the procedures enclosed in this EMS document and are to be taken into account at the Pre-Tender and Contract Award stages and be included in any discussions at Contract Pre-Start Meetings.

## 7. Noise and vibration

The Company has a duty of care to its employees and any other persons who could be adversely affected by noise and vibration emanating from the work activities. The Control of Noise at Work Regulations 2005 applies to all work situations.

Where necessary noise levels will be measured and appropriate action will be taken to ensure the regulation is complied with.

Similarly the Control of Vibration at Work Regulations 2005 will be applied to all relevant activities.

The most appropriate working methods will be used to reduce noise emissions and vibration to a minimum by;

- ◆ Using the most appropriate tools and equipment
- ◆ Reducing the need for noisy activities
- ◆ Keep noisy plant away from public areas or other dwellings
- ◆ Restrict working hours to minimise disturbance to others
- ◆ Ensure that all deliveries of materials take place at reasonable times of the day

- ◆ Minimise drop heights of materials into hoppers, skips or onto the ground
- ◆ Where necessary liaise with conservation groups to minimise any impact on sensitive wildlife

Where noise cannot be reduced to below the **lower exposure action level** of 80 dB (A) measured over an 8 hour shift operators will be required to wear suitable hearing protection and other persons in the vicinity will be warned of the noise hazard.

If the **upper exposure action level** of 85 dB (A) is reached then hearing protection zones will be set up. The exact arrangements will be set out in detail, in the site specific method statement.

Vibration can be easily transmitted through building structures and could be an issue when the building is occupied during the work activity.

The company will liaise with any occupants of the building and others in the vicinity to explain the duration of the work and the practical aspects of any control measures.

### 8. Dust, Emissions and Odours

Dust emissions may constitute a statutory nuisance under the Environmental Protection Act 1990 in which case the local authority could issue an abatement notice effectively stopping the work until the dust is properly controlled.

Working practices will be adopted to eliminate, reduce or control dust emissions and the production of odours.

Special consideration for control measures will be given in circumstances where general good practice may not be sufficient to avoid causing problems.

#### 8.1 Dust Suppression

As it is difficult to suppress dust once it is airborne emphasis will be placed on strategies and control measures to prevent dust being developed. Our strategy for avoiding dust generation is;

- ◆ In dry weather drive vehicles on and off site at slow enough speed to avoid raising dust
- ◆ Damp down the vehicle parking area and immediate haul roads
- ◆ In wet conditions clean the wheels of vehicles leaving the site as deposited mud will dry out later to form dust.
- ◆ Use enclosed chutes where appropriate for dropping waste and debris to the ground
- ◆ Ensure the exhaust from IC engine plant and vehicles does not blast directly onto the ground
- ◆ When materials such as sand and aggregate are stored in stockpiles locate the stockpiles away from the boundary of the site and downwind of any sensitive areas.
- ◆ Take great care when mixing cement in windy conditions
- ◆ Minimise the height of fall of materials
- ◆ Clean up any spillages of dust materials as soon as possible
- ◆ Minimise grinding and cutting of materials on site.
- ◆ Dust collection equipment should be used on power saws, powered cutting discs etc.
- ◆ Use a **fine** water spray on cutting operations on concrete, brickwork or similar.
- ◆ Where necessary mix a suitable proprietary binding agent with the water NB this could lead to contamination of ground water so advice from the Environment Agency should be sought before doing this.
- ◆ No bonfires will be lit on any site.
- ◆ Dust screens will be used where necessary.
- ◆ Where asbestos cement is being removed special control measures will be used as detailed in Asbestos Essentials non- licensed tasks guidance notes a14, em7 etc. all work involving the removal of asbestos cement items will be strictly in accordance with the Control of Asbestos Regulations 2012.

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- ◆ Asbestos cement removal will be fully detailed in the relevant site specific method statement.

Dust levels will be monitored when necessary, initially on a qualitative basis and the results will be recorded.

In extreme cases, or where monitoring is imposed by the local authority, quantitative measurements will be necessary and such measurements will be conducted by a competent person.

### 9. Ground Contamination

The Company recognises the need to ensure that ground at or near the working site must not be contaminated with any noxious or undesirable material. Ground contamination can quickly lead to the contamination of water courses thus exacerbating the problem.

The following steps will be taken to avoid ground contamination;

- ◆ Ensure that no materials are spilled on the ground.
- ◆ Accidental spillages will be cleared up as a matter of priority
- ◆ Drip tray will be used under IC engine plant and vehicles where there is a likelihood of oil contamination.
- ◆ Any water used to suppress dust (silty water) will be disposed of safely and legally usually with consent from the relevant authority.
- ◆ Water and wet rags used to suppress asbestos fibres will be collected and disposed of as hazardous waste in the same way as asbestos materials.

### 10. Water

The Company recognises that it is important to manage water properly on site to protect the environment. The contamination of water courses or if unacceptable wastes are disposed of to a sewer the Company is at risk of prosecution in addition to polluting the environment.

#### 10.1 Disposing of water from site

This applies to a wide range of types of discharge both polluted and unpolluted. Construction site runoff and all waste waters arising must be disposed of in accordance with the requirements of the regulatory authority e.g.

- ◆ Consent will be obtained from the local sewerage undertaking to discharge effluent into the sewers.
- ◆ Consent will be obtained from the Environmental agency to discharge direct to a watercourse.

The consent will establish allowable concentrations of pollutants and flow rates.

#### 10.2 Avoiding contamination of sewers and watercourses

The following precautions will be taken to avoid contaminating sewers or watercourses;

- ◆ Spillages of any materials will be avoided.
- ◆ Oil and fuel tanks will be bunded to 110% of the tank capacity
- ◆ Drip trays will be used where there is a risk of minor contamination
- ◆ Water run off from contaminated ground will be controlled with relevant consent
- ◆ No washing of vehicles or items of plant will be carried out on site.

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Material safety data sheets for any chemicals used on site must be obtained and a COSHH Assessment carried out and be readily available for reference at all times by potential users of the products.

The Company has an Emergency Response Plan which all operators are aware of. This plan is detailed in **Annex B**.

Operators have been trained in this emergency response procedure.

### 11. Transport

The use of motor vehicle transport is an inescapable part of the Company's business due to the scattered nature of the working sites. The use of public transport or rail freight is not a viable option. With this in mind the following controls on the use of road vehicles has been put in place.

- ◆ When vehicles are purchased their fuel consumption, maintenance intervals and effective load carrying capacity etc. will be taken into account along with other operational requirements to ensure the most environmentally friendly option available is selected.
- ◆ Records of fuel consumption are maintained for each vehicle to ensure continued efficient performance
- ◆ All vehicles will be maintained according to the maker's instructions to ensure continued running efficiency and that exhaust emissions remain within specification
- ◆ Vehicles will be loaded to their capacity wherever possible to cut down on unnecessary or part loaded journeys
- ◆ All journeys will be planned to ensure the most efficient use of the vehicle.
- ◆ Engines will not be allowed to idle where it is avoidable.
- ◆ Drivers are required to use the vehicle in the most efficient way and to report any deficiencies immediately.
- ◆ Drivers are to adhere to the guidance given in the Drivers Handbook at all times.
- ◆ Vehicle monitoring systems will be installed to aid managers in controlling routes and planning of deliveries etc. These systems will also be used to produce 'League Tables' to encourage drivers to improve in the areas of fuel efficiency and courteous driving behaviour.

### 12. Risk Assessments

In addition to normal health and safety risk assessments, separate environmental risk assessments have been carried out and are referenced at **Annex C**.

These assessments are to be utilised when carrying out Pre-Tender and Pre-Award site inspections and the results will be incorporated into Site Specific Method Statements and communicated to all operatives working on the site.

### 13. Monitoring

Site environmental audits and inspections will be carried out by a competent person at appropriate regular intervals, by agreement with the Client if necessary. Form ESR 03, Site Environmental Inspection report, will be used as a guide and record of site environmental inspections to assist in facilitating ongoing improvements to the system.

Each report is to be reviewed by the HSQE team.

### 14. Environmental Management Reviews

These will be carried out as and when required to give senior management the opportunity to consider the overall stance of the Company in relation to environmental matters and in particular the direction of

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environmental policy and the effectiveness of the environmental management system. It will consider the whole organisation from design, through purchasing to production, despatch and waste disposal.

### 15. Amendments and Updates

All amendments and updates are to be recorded in the Revision Log and copies redistributed accordingly.

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# Annexes

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## Annex A

### List of approved and qualified recycling and waste disposal contractors

Shanks Waste Management Ltd

Unit 22 Nursling Industrial Estate  
Oriana Way  
Southampton SO16 0YU

Service Enquiries: 0800 0282877

Local Contact

Shanks Waste Management Ltd  
Bleak Hall  
Milton Keynes  
MK6 1NE

Caroline Sykes  
Tel: 01908 202111  
Mob: 07773 813584

## Annex B

### Emergency Response Plan

#### For spillages that could lead to contamination of sewers, watercourses or the ground

1. In case of spillage of oils and chemicals report immediately to the manager or supervisor who should then report the incident to the Environment Agency Tel. 0800 807060 and/or the sewerage undertaking.

They will find out anyway so it is much better to report first as it builds up a better relationship.

2. Don't panic; think before you act otherwise you could make matters worse.
3. Try to identify the source of the pollution and stop the flow immediately. Switch off sources of ignition if fuel is leaking.
4. If fuel or oil has leaked into the drainage system flammable liquid and vapours can travel a long way from the source of pollution and present an explosion hazard.
5. If chemicals or hazardous substances are involved get advice from the COSHH Assessment or Material Safety Data Sheet (MSDS) or by using the emergency telephone number on that sheet.
6. Avoid the spillage spreading;
  - ◆ Check the site drainage plan – where do spillages go?
  - ◆ Stop the flow as soon as possible
  - ◆ Dam the flow with sand, earth or polythene.
  - ◆ Divert from drains, sewers and watercourses when possible
7. Get a spill kit (ensure you always know the location of the spill kit). Use absorbent materials where appropriate Place a boom across watercourses as a precaution
8. Do not wash spillages into the drainage system – it only makes things worse. Never use detergents. Use sand or absorbent pads to mop it up.
9. If the spill has already entered the drain, block off the entrance to the drain.
10. Shovel contaminated sand/earth/granules into sacks or skips according to size. These must be disposed of appropriately. Oil pools may be removed by a sludge-gulper first.

## Annex C

### Environmental Risk Assessments

Indexed here as these are attached as separate documents

ERA No	Title	Date
01	Contamination of Watercourses	January 2010
02	Ground Contamination	January 2010
03	Waste Disposal	January 2010
04	Noise	January 2010
05	Vibration	January 2010
06	Emissions of Dust and Odours	January 2010
07	Wildlife and Natural Features	January 2010
08		

## Annex D

### Management control forms

Indexed here as these are attached as separate documents

Ref No	Title	Date
ESR 01	Environmental Survey Report (Existing Properties)	January 2010
ESR 02	Environmental Survey Report (New Build & Materials to be Used)	January 2010
ESR 03	Site Environmental Inspection Report	January 2010

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**REVISION LOG**

Ser	DATE	REVISION DETAILS	SECTION
01	01/09/2008	First issue	All
02	15/04/2009	Reviewed Change of address	EMS
03	15/01/2010	Reviewed layout, updated content to reflect current company format, version control of forms	All
04	25/01/2011	Reviewed and signed by MD	All
05	25/01/2012	Reviewed and signed by MD	All
06	23/03/2013	Reviewed, addition of new work streams, logo	All
07	31/01/2014	Reviewed and signed by MD	All
08	05/08/2014	File Name Change	Title
09			
10			
11			
12			
13			
14			

**SECTION KEY**

EPS = Environmental Policy Statement

EMS = Environmental Management System (Insert paragraph number)

ANN = Annex (Insert Annex Number)

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