

POLLUTION PREVENTION POLICY

Aware of the environmental issues associated to construction J. Coffey Construction is committed to a policy of pollution prevention on all the projects we undertake in line with the Environmental Agency's pollution prevention guidance document 'PPG6'.

PRE-Construction:

Prior to the start of any project, the pre-construction team will review all relevant information included in the contractual documents such as soil reports, which may identify contaminated ground, drawings identifying water sources or sensitive receptors and any potential sources of pollution/contamination thereafter ensuring the project delivery team are aware of any such pollution sources to ensure measures are in place to mitigate the potential of an environmental incident at the start of any new project.

Project Commencement:

In the first instance the site team should be aware of the three main themes that could trigger an incident, Source, Pathway, Receptor. The **Source** (where pollution can come from) could be a fuel tank, a drain pipe, a liquid container, a gas cylinder, vehicle exhausts. Then **Pathway**, how the pollution could travel through the environment not just the obvious air, land & water, but air conditioning ducts and people; finally the **Receptor** needs to be considered such as a drain outlet leading to another pathway, human, other environmental receptors.

The project team will ensure they are aware of the risks associated to a potential environmental incident, by identifying surface waters and groundwater on, under or adjacent to the project. The team will identify any permissions required e.g. abstraction of discharge licensing paying particular attention to Environmental Permitting Regulations.

The team will then focus on which pollution risks are most significant to the works and focus on those first.

Operatives will be trained in environmental incident mitigation such as 'Spill Drill' training to ensure operatives understand best practice in containment and aftermath implementation.

Site Security:

When acting as a Principal Contractor all efforts will be made to ensure the site boundary is secure and access to site is controlled and ensure all polluting substances are securely locked away in site specific CoSHH cage containers with bunding as the organisation is mindful that if there is unauthorised access onto site then the 'Polluter Pays Principle' kicks in leaving the company at risk to huge fines and loss of reputation.

Public Nuisance:

Naturally projects will have some effect on interested parties such as residents in close proximity, commercial & retail outlets, churches, schools etc. all of which could become effected by the works being carried out. To mitigate this potential, it has to be remembered that noise, dust, fumes & light are other sources of pollution, and just as important to control so as not to affect the wellbeing of those in close proximity to the works. Plant and equipment will be used so far as is reasonably practicable, with retro fit equipment fitted to mitigate fume emissions, acoustic screening to reduce noise, dust suppression through damping down and light pollution (night works) with responsible positioning of flood lighting.

Pollution Prevention Preparation:

During any project set up, a number of control measures will be put in place to mitigate the risk of circumstances leading to pollution namely but not limited to:

- Consider applying for a **Section 61 Consent** to the local authority to approve working methods to reduce and manage noise.
- The Site Manager will identify existing site drainage systems to ascertain SW drains from FW drains
- Secure CoSHH storage cages or cabins which will have adequate bunding to ensure any chemical/fuel containers stored in the bunds have a 10% greater capacity to ensure securing containment along with access to CoSHH data sheets identifying the CoSHH items being stored.
- Locate an 'Oily Pig' to filter bunds containing minor spillage
- Spill kits will be located in close proximity to all plant, fuel & chemical storage, drain gullies, refuelling locations, where there is a risk a spillage may occur.
- Static plant will have bunding placed beneath them to contain leaks
- Appropriate fire extinguishers will be located in close proximity to hot works activities ensuring no combustible materials are close to the works.
- Installation of acoustic screening
- Spoil heaps will be battered on the sides to mitigate dust migration
- A responsible person will be designated to monitor high risk activities on site with sufficient authority to enable them to act to prevent an incident
- Staff will have relevant training to enable an immediate safe response to an incident
- Relevant permissions/licensing will have been applied for and in place prior to the associated works such as discharging surface or ground water from excavations.
- Regular weekly inspections will be carried out by the appointed Site Based Sustainability Champion.
- Fortnightly inspections will be carried out by the Environmental Manager for the organisation who will issue a report based on findings and follow up actions.
- A Senior Manager/Director will carry out a monthly audit on controls and general compliance to the organisation's ISO 14001:2015 standard or BREEAM requirements with a report issued with findings and further actions
- Segregated waste location

Our key supply chain partners will be engaged and required to support this policy's implementation and we will also work with our clients to ensure that the aims of this policy are delivered.

This policy applies to all employees and other personnel engaged in J Coffey Construction operations:

Date: 01.09.19

Signed:

James Coffey
Managing Director

On behalf of J. Coffey Construction