

OIL AND WATER LTD

HEALTH AND SAFETY & ENVIRONMENTAL

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Introduction

This document and all appendices have been produced to reaffirm the Commitment of the Company and employees of Oil & Water Limited to all aspects of Health & Safety and environmental matters.

This information is designed to answer and support Tender processes and independent audits by stakeholders of the Company. Further information regarding each aspect of this document can be provided, together with copies of supporting information by contacting the Safety Manager on 07866.011.118

Directors

The Directors are:

Mr Peter Frampton
Mr Simon Mason

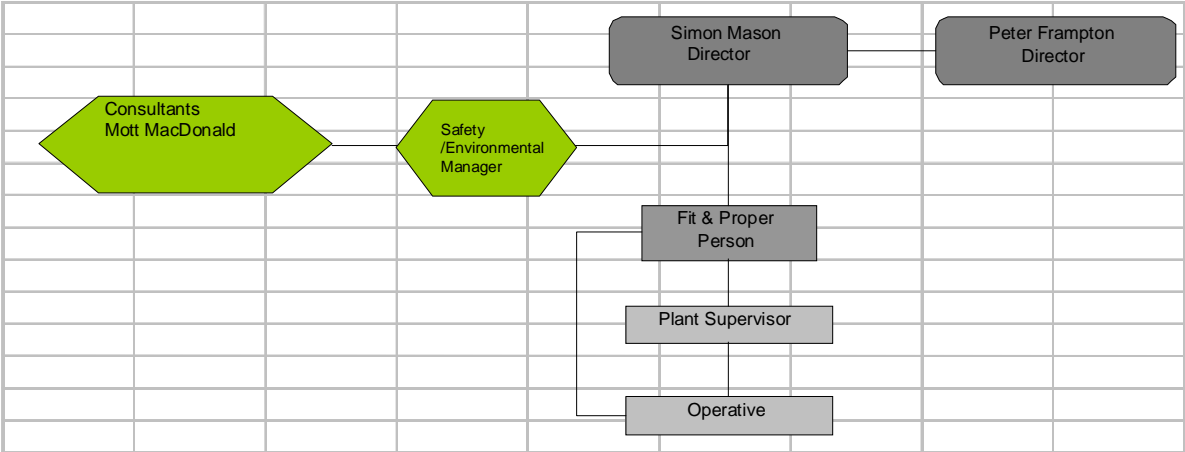
Oil & Water Limited provide the following services

- 1 Hazardous waste Reception and Transfer
- 2 Treatment of Aqueous Wastes
- 3 Recovery for recycling of oil wastes

1. Safety Policy

- 1.1 A copy of the Health & Safety Policy for the company, signed by the Managing Director, has been provided in Appendix A.
- 1.2 Diagrams 1.1 and 1.2 & 1.3 shows the organisational charts for each company and how duties under the policy are allocated from the Managing Director who is ultimately responsible for the Health & Safety of all Oil & Water Limited employees and contractors.
- 1.3 Oil & Water Limited operates under a Permit to Work system that takes into account all the potential hazards of an operation and identifies where specific training is required.
- 1.4 Day to day monitoring of compliance to the policy is undertaken by the business unit manager; additionally Oil & Water has appointed an independent consultant (Mott MacDonald) to monitor compliance and perform audits of operational systems.
- 1.5 An Employee Safety handbook is provided at the Head office and each satellite office and is available for inspection on site.
 - 1 Health & Safety Policy
 - 2 Individual Responsibilities
 - 3 Safety Rules
 - 4 Occupational Health
 - 5 First Aid
 - 6 Fire Actions
 - 7 Joint Consultation
- 1.6 A copy of the Employee Safety Handbook is available at each office location and a copy is available for each employee. A poster describing the following information is clearly displayed at each office/workshop location and contains the following information
 - 1 Employer's general duties
 - 2 Employees general duties
 - 3 Name and contact details of Health & Safety advisor
 - 4 Contact details for the Health & Safety Executive
- 1.7 On induction, each employee is made aware of the location and scope of all above information and is asked to sign to confirm their understanding.

Oil & Water Limited H&S Organisational Tree



2 Health & Safety Services

- 2.1 Health & Safety advice is available within Oil & Water Limited from the Safety Manager. The scope of such advice is limited to the procurement and maintenance of a technical library containing all applicable legislation and H&S guidance/leaflets.
- 2.2 The Safety Manager role is provided by Mr Martyn Eggleton and the current library is held in the Laboratory Office at 20 Wincombe Business Park, Shaftesbury, Dorset, SP7 9QJ. All employees may request copies of all legislation held and can ask for any alternative documents to be held by contacting the above on 01747 858561, or fax 01747 858562.
- 2.3 Guidance on the interpretation of information or further and/or more specific information can be obtained from the HSE Website.
- 2.4 The monitoring of environmental parameters and job specific monitoring that could affect the H&S of employees (noise, gas presence) are carried out by suitably trained supervisors and communicated to all operatives through 'toolbox talks' prior to commencement of works.
- 2.5 The monitoring of longer-term specific parameters (noise, occupational health) is sought externally with suitably qualified (Institute of Acoustics etc), approved contractors.
- 2.6 The monitoring and auditing of compliance to management techniques outlined throughout this document is carried out by QMS International to BS EN ISO9001:2000 for Oil & Water Limited. Copies of the registration certificate have been provided in Appendix B.
- 2.7 Inspections of site conditions and management systems at sites on which Oil & Water Limited personnel are operating can be organised with our client's permission.

3 Health & Safety Performance

- 3.1 Summaries, statistics and reports of all accidents and near-misses are recorded and have been summarised in Table 3.1
- 3.2 Such information may be used by the Management and Directors to identify trends and potential areas for improvement or other training needs.

Table 3.1 H&S Statistics for O&W Limited

	Current Year 2009		Last Year 2008		Two Years Ago 2007	
	No.	%	No.	%	No.	%
Average number employed	34		30		28	
Number of Fatalities	0	0	0	0	0	0
Number of Major and >3 day injuries	0	0	0	0	0	0
Number of non-reportable injuries	0	0	0	0	0	0
Prosecutions / Improvement / Prohibition Notices	0	0	0	0	0	0
Number of civil claims against the company	0	0	0	0	0	0

- 3.3 In addition to the statistics given above, Oil & Water Limited can confirm that neither the Company nor any of its employees have been prosecuted for any breach of health & safety legislation within the last five years.
- 3.4 In addition to the statistics given above, Oil & Water Limited can confirm that neither the Company nor any of its employees have had any Prohibition or Improvement Notice served on them in the last five years.

4 Training

- 4.1 The Directors of Oil & Water Limited have not attended formal Health & Safety Courses but have a full working knowledge of the Health & Safety at Work Act 1974 and have read, understand and are committed to following the guidance provided in Health & Safety Guidance INDG343 02/02 C700 – Directors Responsibilities for Health & Safety. The commitment of the Directors has been formally stated and recorded in the Health & Safety Policy in Appendix A.
- 4.2 All site supervisors have been instructed in general Health & Safety Issues whilst undergoing job specific training. However while none of the employees of Oil & Water Limited holds any NEBOSH or IOSH certificates other than the Safety Manager who has the NEBOSH General Certificate.
- 4.3 All operatives undergo external job-specific training which includes Health & Safety issues and general first aid requirements. For example, the confined space entry training is undertaken by all operatives and includes general first aid instruction. Copies of certificates will be provided to the client for approval prior to commencement of work.
- 4.4 Induction training is provided to all new employees. Additionally, site-specific training may be provided either by the Client or Oil & Water Limited to the satisfaction of the client prior to commencement of work. Copies of signed certificates of competence and signed receipt of information (if provided) forms will be provided to the client for approval prior to commencement of work
- 4.5 Employees required to operate plant and machinery are selected or trained for selection to the appropriate training scheme, certificates will be provided to the client for approval prior to commencement of work.
- 4.6 The appropriateness of training provided is constantly reviewed by consultation of relevant industry journals, liaison with clients and attendance of trade exhibitions. The effectiveness of training is monitored by the Operations Manager by the supplier review process.

5 Sub-contractors

- 5.1 Sub contractors are sometimes used for both construction work, transportation of materials / plant and waste disposal. All such contractors are appointed after review jointly by the Commercial Manager and the Technical Manager. Supplier performance is reviewed at quarterly review meetings attended by all Senior Management.
- 5.2 Labour only sub-contractors are appointed subject to presentation of any relevant certification.

6 Joint Consultation

- 6.1 The appointed Supervisors act as Safety Representatives for operatives employed by the Company.
- 6.2 Due to the low complexity of reporting lines given in tables 2.1 and 2.2, a formal Safety Committee has not been appointed.
- 6.3 A 'toolbox talk' prior to all works carried out on site provides opportunity for all employees to draw attention to any potentially unsafe working practices or risks to health & safety and allows management to review control and safety measures.

7 Design

- 7.1 Oil & Water Limited has not and does not envisage any works, including temporary works, that involve design elements
- 7.2 Should any design issues be raised, external consultation will be sourced to ensure that all obligations under the Control (Design & Management) Regulations 1994.

8 First Aid Arrangements

- 8.1 Oil & Water Limited understands and is committed to the Duties under the Health & Safety (First Aid) Regulations 1981 and the Management of Health & Safety at Work Regulations 1999
- 8.2 The following is a brief outline of arrangements in place to ensure the statement at paragraph 8.1 is complied with
- 1 Provision of certificated 'First Aider' training to ensure availability of 'suitable' persons as defined under the Health & Safety (First Aid) Regulations 1981.
 - 2 Minimum 2 man (usually 3-man) working teams to ensure that there is adequate suitable personnel available to either provide or source help where required.
 - 3 Every operative undergoes job-specific training which includes for general first aid relevant to the work.
 - 4 The provision of all relevant, suitable PPE (as outlined in Section 9) together with relevant instruction in its proper use.

- 5 Provision of first aid containers on Company vehicles and vans.
- 6 Toolbox talks on client's sites to ensure that all operatives are aware of the availability of first aid on site.

9 Personal Protective Clothing & Equipment (PPE / RPE)

9.1 Personal protective equipment is provided, together with adequate instruction to ensure its proper use, to all employees based on a risk assessment (Section 11) and CoSHH assessment (Section 13) and includes the following equipment.

- 1 Hand protection (all work)
- 2 Head protection (all work)
- 3 Ear protection
- 4 Foot protection (all work)
- 5 Inclement weather protection
- 6 Eye protection
- 7 Respiratory protection
- 8 Hi-visibility vests or jackets
- 9 Fall arrestors
- 10 Breathing apparatus
- 11 Chemical resistant suits
- 12 Any other equipment as deemed necessary

10 Young Persons

10.1 Oil & Water Limited will not employ any young persons (under the age of 18 years)

11 Risk Assessment and Safety Method Statement

- 11.1 Written risk assessments for all work activities are produced along with relevant safety method statements
- 11.2 Site/work specific risk assessments and safety method statements are produced and reported prior to commencement of any work on client's sites. The scope and format of such assessments are provided in Appendix C.
- 11.3 The potential risks highlighted in the above assessments along with the relevant control measures arising from them are presented to the workforce for information and review as part of the 'toolbox talks' prior to commencement of work.

12 Noise Assessments

- 12.1 Noise assessments will be undertaken by supervisors for any identified operations likely to exceed noise levels specified in the Noise at Work Regulations 1989. Such assessments may be backed up by assessment by external members of the Institute of Acoustics where necessary.
- 12.2 Where deemed to be necessary or recommended suitable ear protection will be provided to all employees.
- 12.3 To protect third parties, exclusion zones with warning signs will be set up at a suitable distance (as described by Noise monitor) to prevent unprotected entry to 'noisy' areas. All noise assessments will be carried out with reference to BS4142:1997

13 Control of Substances Hazardous to Health (COSHH)

- 13.1 Oil & Water Limited regularly undertakes the loading/unloading and transport of hazardous and dangerous materials and therefore employs a certified Dangerous Goods Safety Advisor as required under the Carriage of Dangerous Good. A copy of the DGSA Certificate is provided in Appendix D
- 13.2 As part of the risk assessment, the presence of any hazardous material is identified and presented to the DGSA for review. An assessment is undertaken in accordance with the Control of Substances Hazardous to Health Regulations 1999 and provided to the Operations Manager.
- 13.3 The COSHH assessment will indicate the appropriate risk and safety phrases for the chemical in question along with the relevant PPE to reduce any potential risks to the workforce.
- 13.4 In general the COSHH assessment is limited to a risk reduction by prevention of exposure exercise rather than material substitution due to the nature of the work.
- 13.5 To protect third parties, exclusion zones with warning signs will be set up at a suitable distance to prevent unprotected entry to work areas.
- 13.6 The Company will utilise the HSE e-COSHH Essentials system when reviewing or updating COSHH assessments.

14 Informing Employees

- 14.1 All employees will receive information, instruction and training based upon risk assessments as identified in Sections 11, 12 and 13.
- 14.2 All employees are informed of all risks, control measures, duties and training required at 'toolbox talks' performed prior to commencement of work. All employees are consulted at this point to identify any extra training requirements.

- 14.3 Oil & Water Limited trains individuals with specific responsibilities such as electrical hazard. Such training is sought externally and results in the issue of a Certificate of Competence. Copies of such certificates and the scope of training are available as required.

15 Housekeeping and Waste Control

- 15.1 Unless specified otherwise by contract, Oil & Water Limited will clear all waste/debris/rubbish on a regular basis. This could be a daily basis for non-controlled and non-special waste; however where waste is deemed as Special under the Special Waste Regulations 1996, a minimum of 3 days delay will be incurred due to legislative constraint.

- 15.2 Oil & Water Limited is registered as a both a waste carrier and a waste broker as detailed below and issued by the South Wessex Area authority (01258 483398). A copy of the Registration Certificate had been provided in Appendix E

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- 15.3 Oil & Water Limited operate a physico-chemical treatment facility with oil/hydrocarbon recovery and waste transfer at Shaftesbury under the Pollution Prevention and Control Regulations. Copies of the Licence and permit are provided in Appendix F

- 15.4 All 3rd party waste hauliers, brokers and disposal services will be sourced from appropriately licensed or registered Company. All legally required, traceable paperwork relating to waste removed from site will be maintained in accordance with applicable legislation.

16 Temporary Works & Access Equipment

- 16.1 Where applicable, all ladders, scaffolds and other temporary works platforms and temporary retaining structures will be constructed by approved, certified personnel.

- 16.2 Where such materials are hired, all equipment will be checked for maintenance and servicing records to ensure that current certificates are in date, the working load limits will not be exceeded. Where such materials are owned by Oil & Water Limited monitoring and maintenance checks will be performed in accordance with the manufacturer's instructions as a minimum.

- 16.3 A final visual check of integrity will be performed prior to using any such equipment.

- 16.4 To protect third parties, exclusion zones with warning signs will be set up at a suitable distance prevent unauthorised entry to temporary work areas.

- 16.5 All man-entry equipment including tripod escape systems and BA equipment will be externally certified for use in accordance with statutory controls as outlined in Section 17

17 Plant & Equipment – Statutory Test & Maintenance

- 17.1 Task lighting and portable electrical hand tools will be provided where applicable and will be suitably rated/classified for the area of work. Voltage and safety requirements will be assessed and detailed in the safety method statements and all equipment will be checked prior to use.
- 17.2 To ensure that the most up-to-date technology is used, many items of equipment are hired from approved suppliers together with the relevant certification of maintenance, calibration and inspection.
- 17.3 Company owned equipment is cleaned and maintained, where possible, on completion of work at the Company's Depot in Kingsnorth, Kent. Such informal maintenance is backed up by independent testing such as PAC tests, BA equipment tests etc, this is documented by use of 'tagging' system on relevant equipment.
- 17.4 Such tags and certificates can be provided and checked prior to commencement of any work.

18 General Welfare Arrangements

- 18.1 It is usual for the client to provide general welfare arrangements, however where identified as needed, other statutory welfare provisions will be provided by Oil & Water Limited in accordance with the relevant guidance. Details will be provided on a job-specific basis but will include the following:
- 1 Provision of suitable decontamination areas.
 - 2 Provision of suitable emergency washing facilities.
 - 3 Provision of contamination monitoring equipment.

19 Asbestos

- 19.1 Oil & Water Limited is not registered as a Licensed Asbestos Removal contractor and therefore will not undertake work with asbestos.
- 19.2 Oil & Water Limited has access to a number of licensed Asbestos Removal contractors and will aid the client in sourcing such services were required.

20 Road/Utility Work

- 20.1 Oil & Water Limited does not currently undertake road/utility work and therefore has not yet obtained certification of employees under the New Roads and Street Works Act.

21 Interface with Others

- 21.1 Oil & Water Limited will co-operate with the client and other relevant contractors in connection with the work and/or Health & Safety or Environmental matters.

22 Storage of Hazardous/Flammable substances/gases and Environmental Matters

- 22.1 Where work requires the storage of hazardous materials, any such arrangements will be in accordance with applicable regulations including:

- 1 Control of Pollution (Oil Storage) Regulations 2001
- 2 HSG176 - The Storage of flammable liquids in tanks
- 3 HSG71 - The Storage of flammable liquids in containers
- 4 HSG51 - The Storage of Packaged Dangerous Substances

- 22.2 Oil & Water Limited is dedicated to the commitments made in the Environmental Policy and therefore will comply with its duties under Environmental Legislation and will work with the Client to minimise or prevent noise or nuisance production, protect ground and surface waters and minimise the production of waste materials. A copy of the Environmental Policy is provided in Appendix A.

23 Client & Site Specific Health & Safety Training

- 23.1 Oil & Water Limited will allow its employees to be released on provision of reasonable notice for Client and Site specific training at no cost to the Client.

24 Communication Arrangements

- 24.1 Each job will be allocated a supervisor who will act as the point of contact on site for the receipt of health & safety or environmental communications arising from the works
- 24.2 The relevant supervisor will be named and contact information provided to the client's contact prior to commencement of works.

25 Employers and Public Liability Insurance

- 25.1 Each Company within the group has employers and public liability insurance as detailed below, the certificate has been provided in Appendix G

Cover	Level
Employer's	£10,000,000
Public Liability	£10,000,000

26 References

- 26.1 The following references are Company for whom we have carried out similar works to that for which we are tendering or currently providing and may be contacted to confirm information provided in this document.

EON plc

*Kingsnorth Power Station
Hoo St Werburgh
Rochester
Kent
ME3 9NQ*

Kaneb Terminals Limited

*London Road
Grays
Essex
RM17 5YU*

*Mr J. Offam
01634 250088*

*Mr Danny Carter
01375 374775*

ADM Pura Ltd

*London Road
Purfleet
Essex
RM19 1SD*

*Mr Hugh Glover
01780.894.200*



27 Health & Safety Plan

- 27.1 For contracts or projects to which the full scope of the CDM regulations apply, Oil & Water Limited will liaise with the Client to prepare a fully scoped and resourced Health & Safety plan.

28 Confirmation of Arrangements

- 28.1 The signatory to this document confirms that Oil & Water Limited will operate to a high standard of Health and Safety, and accepts the need for, and the requirement to provide any relevant health and safety information to the Client concerning associated works.
- 28.2 In addition to above, Oil & Water Limited confirms that the foregoing items will be the responsibility of Oil & Water Limited for any sub-let operations and that any sub-let contractor has been assessed for competence and resource and also in accordance with the CDM Regulations (where applicable).
- 28.3 Any operation that is to be sub-let will be identified to the client and approved prior to commencement of operations.

Signed on Behalf of Oil & Water Limited:

Signed.......... Director

Simon Mason

Date 02/02/2010