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ENVIRONMENT POLICY
POLICY STATEMENT

Everyone working in the construction industry has a special and shared responsibility for the environment.

The industry is a major user of the earth's resources and the scale of our operations often impinges on local communities affecting their day-to-day lives and well being. The buildings we construct, refurbish and maintain become part of the world we live in an everyday reminder of what we do. In a very real way we are affecting the future environment in which everyone will live and work.

We at RD Bull take this responsibility very serious. Caring for the environment is a part of our working culture and every working day we genuinely endeavor to behave in line with the highest environmental principals.

We will co-operate fully with and carry out the requirements of the Environment Agency, Local Authorities and other Companies.

This document outlines our environmental policy and objectives, which guide our day-to-day activities.

Further specific environmental details can be obtained upon request, either from our Head Office, our Safety Consultant or detailed within the Site Management Plan held by the site concerned.

Signed: Date: 16th July 2011

Richard Bull
Managing Director

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INTRODUCTION

This policy and procedures document has been prepared to comply with the requirements of BS EN ISO 14001:2004, and will be reviewed regularly to ensure compliance with current legislation and company procedures. It describes the organisation and arrangements to put into practical effect the commitment made in the Environmental Policy Statement.

RD Bull is committed to maintaining high environmental standards throughout the companies operations. Company requirements are stated in this document to secure, so far as is reasonably practicable, the environmental well being of our own employees and of others, including the general public, who may be affected by our operations.

Every employee is required to take all reasonably practicable steps, to ensure that work is carried out in a safe and efficient manner in accordance with the law and the procedures laid down by the group.

Information, instruction, training and supervision will be given to ensure that only safe systems of work are applied to our operations as applicable. Protective clothing and other personal safeguards will be issued and used appropriate to the tasks being carried out.

The Company's Environmental Management System comprises this document and as a minimum the details identified within Site Management Plans and company procedures. The system is applicable to all projects and permanent offices.

Formal amendment to this document is the responsibility of the Environmental Consultants with the approval of RD Bull . It will be brought to the notice of all employees. Staff appointed responsible for the management and implementation of this environmental policy, will ensure that at least one copy is available on each site.

1.0. GUIDING PRINCIPLES

RD Bull fully supports the aims and objectives of the Environmental Protection Act 1990, and the Environment Act 1995, together with any other relevant statutory provisions.

The Governments plans for Integrated Pollution Control (IPC) provide the framework for our actions. We shall always co-operate fully with the Environment Agency to ensure that these requirements are properly met.

For non-I PC processes, we work closely with respective Local Authorities, the Environment Agency and any other affected parties such as English Heritage etc.

Our main aim is to plan activities and implement control measures to ensure compliance with Client requirements, and relevant statutory provisions associated with our works, to avoid the need for complaint and issue of enforcement (improvement or prohibition) notice, or prosecution.

These requirements are detailed within a specific Management Plan for each project. We shall:

1.1. MITIGATE THE ENVIRONMENTAL IMPACT OP OUR OPERATIONS

• By paying particular attention to the concerns of the local and wider community affected.

1.2. MINIMISE USE OF THE EARTH'S RESOURCES

• By using appropriate recycling procedures and materials from renewable resources wherever practical.

1.3. ENSURE BEST APPROPRIATE ENVIRONMENTAL STANDARDS

• At all of our sites and offices wherever we have influence.

1.4. ENCOURAGE ENVIRONMENTAL ATTITUDES

• Among staff, supplies and subcontractors, by working with companies whose environmental attitude reflects our own, and increase awareness by appropriate training.

1.5. BE ENVIRONMENTALLY FORWARD THINKING

• By reviewing our environmental policy in line with the latest environment-sensitive thinking as it unfolds in the everyday world.

1.6. SEEK ALTERNATIVE SOLUTIONS

• Where we have influence over the design elements of our projects, we shall evaluate alternatives where possible and reduced environmental impact.

2.0. KEY ENVIRONMENTAL CONCERNS

As Civil Engineering and Building Contractors, we deal every day with a number of environmental problems, which specifically relate to our industry.

The key areas of concern are:

2.1. NOISE POLLUTION

• Particularly where it may affect people on the site, and the quality of life for people living and working in the vicinity.

2.2. VISUAL POLLUTION

• Including site boards, site cleanliness and general site tidiness.

2.3. AIR POLLUTION

• Where it poses a risk to people on site, in the vicinity or further afield.

2.4. WASTE MATERIALS AND EFFLUENT

• As defined in the Waste Management Licensing Regulations, and the Special Waste Regulations, this applies to the most hazardous wastes. These are substances which become waste when discarded such as:

(a) Rubble, concrete and other solids which do not decompose.
(b) Waste which will rot and decompose such as food, paper and timber.
(c) Wastes which are dangerous to dispose of or store.

2.5. CONTAMINATED LAND

• It's increasing use for re-development poses special problems and requires particular consideration for its rehabilitation.

2.6. WATER POLLUTION

• As defined in The Water Resources Act 1991 and Water Act 2003 covering controlled waters and all water courses and water in underground strata. This is a major concern for our operations as surface water gullies and road drains usually discharge into controlled waters.

2.7. WASTEFUL PRACTICES

• Which make inefficient use of materials and consumables both in the office and on-site as part of the construction process.

3. 0. PRINCIPLE OBJECTIVES

Everybody in the company has a duty of care to ensure that problems are dealt within a responsible manner with due concern for the environment. This care will operate on an individual, managerial and company level.

Our Management Systems are designed to meet the concerns already outlined. We consider the necessary actions to be taken both during planning and other non-operational stages and the measures required during construction. Issues addressed are those which are of immediate concern to the general public such as noise, nuisance and airborne pollution and those 'behind the scenes' factors such as waste control and land remediation which are a vital part of the overall environmental picture.

3.1. IMPACT ASSESSMENT

Where we have influence at the project design stage, a systematic analysis of the potential environmental impact will be carried out. This information will be included in the project details, and shall be provided to the regulatory bodies where required, in order to obtain necessary permission, to carry out the works. The evaluation will ensure that measures adopted to mitigate environmental impact in one area of operations do not impinge on another.

3.2. SITE ESTABLISHMENT

This will be implemented in such a way that likely causes of environmental nuisance are eliminated or minimised. In particular, boundary fencing and site screening will be of good appearance so that the passing public and local residents will have no cause to complain about the visual impact of our operation.

3.3. WORK METHODS

These will be planned to minimise environmental effect, particularly where residential areas are concerned. Minimising use and routing of site traffic through residential areas is a prime requirement.

3.4. COMMUNITY RELATIONS

We will inform affected parties where appropriate and explain how and when our operations will affect them, by use of public meetings, notices, signs or by verbal or written means. Where considered appropriate we will make contact with residential associations and implement a public relations programme to acquaint the local community with the essential nature of our operations.

3.5. ONGOING ASSESSMENTS

Ongoing environmental assessments and inspections will be made during construction to ensure that work is being carried out in an environmentally sensitive manner until the project is completed.

3.6. DEALING WITH COMPLAINTS

In practice, all site operations will be planned and carried out to avoid any reason for complaint. Where a complaint is raised, prompts action will be taken to mitigate concerns and resolve the situation to avoid further upset. In every case we will be sensitive to concerns so that there will be no justifiable reason to complain to the local enforcing authority.

4. 0. MINIM ISING EFFECT

4.1. NOISE LEVELS

The company recognises that noise is a very sensitive issue. For this reason operations will be planned, including working to restricted hours wherever possible to avoid the need to apply to the local authority for special permissions under the Control of Pollution Act 1974.

Wherever practical, we will work within the ambient noise level, which exists in the vicinity of the site. To help meet this objective we will carry out a noise survey in areas of concern before commencing operations. This will be especially important when operating near hospitals, schools, residential areas and places of work. Noisy site activity particularly during the evening, night, Sunday morning and weekend will be minimised. Where it is considered essential for site progress, the reasons will be explained to residents.

Where our activities will cause increased noise levels we shall use best available quiet machinery. This will be properly maintained to minimise noise levels and noise reduction screens may be used.

4.2. VISUAL POLLUTION

Perception of correct environmental behaviour is often influenced by a variety of visual signals. We will do everything we can, not only to behave in an environmentally sensitive way, but also to be seen doing so.

The following actions will therefore be taken in and around our operational sites.

Site boards and publicity information signs will be kept clean and comply with local requirements.

- Access routes will be properly marked.
- Vehicles and pedestrians will be kept apart wherever practical.
- Good site tidiness will be an ongoing objective with materials properly stored and vehicles
- parked sensibly.
- Rubbish will be regularly cleared and action taken to prevent airborne litter.

4.3. AIRBORNE POLLUTION

All site personnel will be made fully conversant with the effects of airborne pollution.

Fundamental factors they will need t be acquainted with are:

- The ease with which airborne particles contained in dust and smoke can spread especially in strong or prevailing winds.
- The danger to people in the immediate area and further afield.
- How gases and dust can contaminate crops, enter the food chain and ultimately pose a real threat to the general population
- How airborne acids and gases can attack the fabric of buildings and other structures.

4.4. PREVENTATIVE ACTION

Dust will be controlled at source using damping down procedures. Precautions will be taken to ensure that water used in the damping down process, which may have become contaminated, does not run into a watercourse or sewer.

The use of plant and machinery close to residential dwellings will be closely controlled so that the effects of exhaust emissions are restricted. Similar consideration will be given to the routing of vehicles.

Where operations will create a large amount of dust, appropriate actions will be taken to keep it to a minimum. Operations to be controlled in this way include:

(a) Rubbish dumping in skips. Sheeting should be used to prevent the escape of dust, particularly during transport.

(b) Mechanical raking-out of mortar joints and similar operations. To mitigate the effect, a water suppressant or vacuum device will be used.

(c) Earthworks / Haulage routes on site. Dust suppression measures shall be implemented.

5. 0. PROTECTING WATER COURSES

We will take every reasonable precaution to ensure the protection of rivers, streams and other watercourses.

5.1. PRIOR CONSENTS

Permission will be obtained from the Local Authority or Environmental Agency before discharge into a watercourse takes place, and provisions made to ensure discharge is safe.

To remove silt contamination, controlled pumping will take place via a settlement tank or lagoon, and if necessary, further testing shall be carried out for other contaminants prior to

discharge.

Where work is being carried out near a foul tank or trunk sewer, we will give the required notice to the Water Authority prior to commencement of any works.

5.2. PRECAUTIONS

Care will be taken to minimise the possibility of cement leaking into the watercourse when wet concrete is placed in the vicinity. Cleaning concrete mixing plant, such as ready mix concrete lorries, will only be carried out where resulting effluent cannot flow into watercourses and drains. Where there is a risk, control measures shall be agreed.

6. 0. STRATEGY FOR WASTE CONTROL AND DISPOSAL

6.1. DESIGNATED RESPONSIBILITY

Whilst everyone on site will be called upon to do everything they can to minimise waste, it is the appointed Site Agent/Managers responsibility to ensure the following actions are addressed:

• Minimise waste and ensure its correct storage and removal.

• Where possible, segregate individual waste types so that materials can be re-processed for use on site or sold on. Wherever practical the preferred option is for recyclable material to be reused on site or moved to another site where it is appropriate.

• Ensure that toxic or hazardous wastes are not mixed with general site waste.

• Take care that stored liquid waste does not permeate into the ground.

• Under no circumstances allow waste to be burned on site.

• Store liquid waste in a suitable manner for eventual removal to a specialist disposal site.

• Prevent unsupervised discharge of liquid waste to a drainage or sewer system. Where discharge is allowable, obtain authorisation from the appropriate authority, and monitor at all times.

6.2. WASTE DISPOSAL PROCEDURES

All waste from the site will be taken to a facility licensed by the Environment Agency.

Special Waste and Controlled Waste will be separated and handled as appropriate.

Special Waste is defined in the Waste Management Licensing Regulations 1994, as those, which are a danger to health, by inhalation, ingestion and skin or eye contact, or materials with a flash point of 21CC or less. The Special Waste Regulations incorporate a wider range of hazard properties, e.g. an extended flash point to (55$_3$C) ecotoxicity etc.

All Controlled Wastes will be taken to an appropriately licensed controlled waste tip.

Transport of waste materials to the appropriate type of tip will only be undertaken by a properly registered carrier who has current registration for the type of waste being disposed of.

6.3. WASTE CONTROL DOCUMENTATION

To ensure correct disposal of waste, documented procedures will be implemented and fully complied with.

6.4. CONTROLLED WASTE

A waste transfer not will be completed which will specify the originator of the waste, its description, the carrier and disposal arrangements.

6.5. SPECIAL WASTE

The 'Five copy' consignment note procedure detailed within the Special Waste Regulations will be strictly adhered to.

The person on site in charge of waste disposal will obtain the name and address of the disposal tip before the consignment leaves. That person will ensure that the tip has an appropriate license. If in doubt the Environment Agency will be contacted.

The carrier must return a copy of the form validating correct disposal.

7. 0. DEALING WITH CONTAMINATED LAND

We shall only remove contaminated land where instructed to do so. Wherever possible, we shall carry out remediation as an alternative to eliminate or minimise the environmental risk.

The following procedures will be adopted:

7.1. ASSESSING THE HAZARD

An assessment will be made prior to appropriate remedial action being taken. The area(s) of hazardous waste shall be identified on site and cordoned off accordingly.

7.2. EMPLOYEE/PUBLIC SAFETY

All work will be carried out in accordance with appropriate HSE publications, and Specific Method Statements', with dirty/clean areas developed as appropriate.

7.3. PERSONAL PROTECTIVE EQUIPMENT

All visitors and persons working on the site shall wear safety boots, helmet and a hi-visibility vest. Further precautions will depend upon the activities being carried out on site as well as the type of work being undertaken by the person(s) in question.

7.4. DEALING WITH CONTAMINATED MATERIAL

Special waste will be removed to a licensed waste tip. Materials that can remain on site will be isolated by an appropriate encapsulation method, or be suitably remediated. Before leaving the site, all vehicles shall be checked to prevent contaminates being split or deposited on the public highway

7.5. BUNDED STORAGE AREAS

These will be used to avoid the spillage and spread of contaminated materials around the site.

7.6. STORAGE TANKS FOR CONTAMINATED LIQUIDS

These will be located on firm foundations above the ground so that they can be regularly inspected for corrosion or leaks. They will be lined with an appropriate impermeable material and clear marking will show capacity and contents. Where existing tanks are in place, these shall be used and removed if required upon completion of the works.

8. 0. RESOURCE MANAGEMENT

In recognition of the fact that the earth's resources are finite, every step will be taken to minimise waste through recycling or other techniques.

8.1. CONSTRUCTION MATERIALS

Whenever possible, we will upgrade low quality materials by blending with others, or modify with additives. We will crush, pulverise and stabilise materials that would be otherwise classified as unsuitable or deemed to be waste. Where possible, these alternative 'environmentally friendly' materials shall be proposed for incorporation into the works.

8.2. VEHICLES

Company owned and operated vehicles shall generally be diesel powered, as this has been considered to be more energy efficient than equivalent petrol driven vehicles, resulting in less fuel consumed by our fleet generally.

8.3. OFFICE MATERIALS

All staff shall be encouraged to take sensible measures to sue products such as stationary produced from recycled materials. Waste paper shall be kept to a minimum, and where possible a recycling system implemented.

8.4. FUEL ECONOMY

Staff shall be encouraged to switch off lights, heaters, office equipment and machinery when not in use. Rooms will be kept at a comfortable leave and not allowed to overheat.

8.5. BATCH ECONOMY
Over-ordering of materials will be discouraged. The same applies when batching material such as mortar on site.