the
GRAHAM BOLTON PLANNING
partnership limited

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PROCESSING OF ANIMAL BY-PRODUCTS TO PRODUCE TALLOW AND MEAT AND BONE MEAL BY HEATING AND CENTRIFUGAL EXTRACTION

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SITE REPORT & POLLUTION RISK TO LAND

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CONTENTS

Summary

This document is the Site Report for Edge Close Green Energy Ltd incorporating the associated activity of the generation of electricity using animal oil (tallow) derived from the Installation activity and which supplies heat for use in a heat exchange boiler which generates steam for the process. It is submitted as part of the application for a permit to operate an Installation under the Environmental Permitting (England and Wales) Regulations 2016, and should be read in conjunction with the other documents submitted as part of the Permit application.

Records of the site and surrounding areas have been reviewed in order to describe the condition of the site and, in particular, to identify any substance in, on or under the land which may constitute a pollution risk to the land. Potential polluting emissions and pollution prevention measures in respect of the Installation activity have been identified and an assessment of future pollution potential to land has been undertaken – see also Documents B2.2, B2.3 and B2.11.

An assessment of the potential pathways and impact of pollutants upon land has been undertaken.

It is concluded that as the site is previously undeveloped and has not been subject to past pollution incidents, there is no current risk to land. It is also concluded that given the nature of the raw material, the processes involved and the control and prevention measures in place that during the operation of the prescribed process on the Installation site there is no reasonable or likely risk of contamination of land.

1. INTRODUCTION

1.1 This application site report (ASR) has been prepared by The Graham Bolton Planning Partnership Limited (GBPP) following a site visit by personnel of GBPP, and investigation of relevant desk top data. This report has been compiled in liaison with management of Edge Close Green Energy Ltd and F Redfern & Sons Ltd which operates the adjoin knackery, Intermediate Plant, veterinary waste transfer station and carcass and pet incinerator.

Site Location

1.1 The Installation is located at the rear (north) of the knackery at Main Road, Flagg, Derbyshire, SK17 9QT. The site is at easting 413212, northing 368971. The site covers an area of approximately 0.7 hectares. The location of the site can be seen in plan ECGE SM1.

1.2 Flagg is an elongated village in the White Peak area of the Peak District National Park, to the south east of Buxton. The appearance of the locality is defined by the primary limestone geology of the area and the historic medieval strip farming now defined by dry stone walls. Development in the village straddles Main Road locality but is mainly located on the north side of the road; the development consists of residential properties and farms.

1.3 The site is part of a traditional dry stone walled strip agricultural field rising to the north of the knackery. The field, and site, is previously undeveloped and used to hold stock in connection with the wider knackery business.

1.4 The southern part of what at one time would have been an open field is occupied by the knackery business and associated activities of F Redfern & Sons Ltd. It is occupied by a number of large agricultural styled modern buildings; the Installation building is being constructed in the same style and

scale to fit in with those buildings and will immediately adjoin the hides building at the northern end of the knackery.

1.5 Prior to excavation, the site was steeply rising land. There are no streams near the site.

2 DETAILS OF THE INSTALLATION

2.1 The proposal at Flagg is to retain rather than dispatch off-site the animal carcasses and by-products received at the knackery and Intermediate Plant and use an innovative process to extract the animal oil (tallow) – it is not a process of dehydration or evaporative rendering, as described by the Secretary of State for traditional "rendering". The extracted oil would be used as a clean biomass fuel in an electricity generating set (Directly Associated Activity) to provide electricity to the Installation and knackery, export to the grid, and heat used in a heat exchange boiler to create steam for the Installation process.

2.2 The process is detailed in Document B2.1A. Animal by-products would be passed from a storage bin through grinders, to obtain a correct size for processing in accordance with the EU Animal By-Products Regulations (ABPR), a metal detector, and then passed to the process plant in which it would be heated and homogenised to allow water and the animal oil to be extracted by a high speed centrifuge; the remaining material would then be passed to a dryer and the MBM shipped off-site for use as a fuel elsewhere. A 450mm diameter chimney, extending 3m above the ridge, would disperse emissions from the heat exchange boiler and the generating set; emissions from the dryer and process equipment would be used as combustion air in the generating set. Waste water from the process would collected and despatched off-site for disposal.

2.3 The Installation will be housed in a purpose built, sound attenuated and closed building extending to 600m^2 for which planning permission has been granted, and which is currently under construction. The building, measuring 20m by 30m and with an eaves height of 6.1m and 8.12 to the apex, will include four large roller shutter doors on the east facing elevation to allow access for the introduction of plant or delivery of raw material or collection of meat and bone

meal (MBM); except when required all doors will be kept shut. Personnel and emergency access doors will be self-closing.

2.4 Externally, the Installation site also includes four 6m tall storage tanks within a concrete bund 1.7m in height, two 60Te capacity for recyclable water, one 60Te tank for waste water and one 40Te heated tank for storing animal oil (tallow). The area of tank storage with its bund is approximately $85m^2$. The volume of the bund is $142.5m^3$ in excess of the requirement for 110% capacity of the largest tank within the bund.

3 SITE HISTORY

3.1 The adjoining knackery site has a long history in that use extending to over 50 years. In that period the business and development on that site has expanded reflecting the reduced number of knackery businesses operating, changes resulting from the BSE and Foot and Mouth Disease crises and Regulatory requirements.

3.2 The Installation site has no specific history being part of the agricultural grazing land formerly part of the knackery business.

4 OBJECTIVES

4.1 The objectives of this report, in association with the other reports prepared for the Environmental Permitting application are:

- Identifying the environmental setting and land pollution history of the site;
- Identifying activities that will be conducted at the installation that may lead to land pollution – see Documents B2.2 and B2.11;
- Identifying and assessing the preventative measures that are in place to protect the land – see Documents B2.3 and B2.8; and
- Assessing whether there is:
    - little likelihood that land pollution or leaks to land will occur during the future life of the installation, or there is
    - a reasonable possibility that there is potential for current or future land pollution of the land from the installation.

5. SITE SETTING AND SOURCES OF DESK STUDY INFORMATION

5.1 The following sections detail the source of Desk Study Information searched in order to describe the condition of the Installation site and, in particular, to determine the potential for substances to be present in, on or under the land associated with present and past uses of the site and its surrounding areas.

Environmental Consents, Licences, Authorisations, Permits and Designations for the Site and Surrounding Area

5.2 Derbyshire Dales District Council is the regulating authority for the prescribed activities carried on at the adjoining site of the knackery/Intermediate Plant and the veterinary waste transfer station.

5.3 Under Permit No. 98/5.1/B F Redfern & Sons Ltd is licenced to operate a **waste incineration process** prescribed under Section 5.1 of Schedule 1 of the Regulations, with the directly associated activity of the reception and flaying (knackery activity) of animal carcasses prior to incineration.

5.4 F Redfern and Sons Ltd also operate a **veterinary waste transfer station** on the adjoining site under Permit No. 98/Waste/A. Pre-bagged veterinary waste and sharps are collected from veterinary practices and bulked up for onward shipment to a clinical waste disposal facility.

5.5 The Environment Agency data maps have been reviewed. To the north of the Installation site at Carlton Hill, Taddington, is a **waste processing and landfill** facility (DER009/43210) operated by Derbyshire Waste Ltd.

5.6 Due west of the site at Hindlow Works, over 3.5km away, there are **cement and lime processing plants** operated by Tarmac Ltd (XP3134UZ and Licence AH 9839) and also Buxton Lime Industries (BK95471N).

5.7 The Environment Agency data maps reveal that the location is within a **groundwater vulnerable zone**, though not a groundwater protected zone; there is an intermediate major aquifer beneath the location. It is noted that the aquifer is potentially vulnerable to phosphates from agricultural application.

5.8 The Duke of Rutland has a **large scale water abstraction licence** (No. 03/28/39/0088) for a location 2km due west of the Installation site near Pomeroy, for the purposes of aquaculture, and F Redfern & Sons Ltd have a **small scale water abstraction licence** (No. 03/28/39/0108) at Flagg close to the Installation site for general agricultural purposes.

5.9 **Upper Lathkill SSSI** is located approximately 1.2km to the south east of the Installation site. This is a geological site rocks with caves in the carboniferous limestone of the central Derbyshire limestone dome; the rocks exposed in Monyash quarry afford a section through an outstanding example of a shelf developed reef, a limestone structure composed of and formed by marine organisms. It is of great importance in the interpretation of the geological history of the Derbyshire area during early Carboniferous times, some 340 million years ago.

5.10 The Company does **not hold a discharge licence** for the waste water stream; the waste water will be removed from the Installation site for off-site authorised disposal.

Geology and Hydrogeology

5.11 The Installation site is located within the Derbyshire dome of carboniferous limestone with outcrops of dolomite (a hardened limestone), volcanic rocks (basalt – this was quarried eg at Calton Hill to the north) and infused minerals, notably lead and fluorspar which have been mined commercially; a large number of redundant workings are within 2km of Flagg, including the former Hubberdale lead mine, north west of the site. Shale and gritstone bedrocks

also form part of the underlying geology of the Peak District but not in the locality of the site.

5.12 In the immediate vicinity of the Installation site, the land is underlain by Monsal Dale Limestone above the Bee Low Limestone series. Within a kilometre to the south and south east of the site, the limestone is overlain with Longstone Mudstones with outcrops of apron reef limestones associated with the Bee Low series.

5.13 The rocks in the Peak District dome is massively fissured karst limestone allowing for large supplies of water to be gathered in aquifers. As noted, an intermediate Major Aquifer underlies the site.

5.14 The nature of the geology below and the hydrology of the area indicates that there is a potential pathway which could lead or contribute to pollution of groundwater and land without appropriate controls.

Site Investigation and Assessment

5.15 There has been no previous relevant site investigation or assessment undertaken at the Installation site prior to the submission of the planning application for the Installation development.

5.16 The Installation is being developed on previously undeveloped land formerly in agricultural use associated with the operation of the knackery. On inspection there is no apparent evidence of any past pollution of the site.

5.17 The site has been excavated to allow for construction of the Installation building and access from the knacker yard. Limestone ground rock, with intrusions of harder (dolomite?) limestone outcrops overlain with clay-like soils have been exposed; no evidence of any past pollution of the site has been revealed.

Other Information

5.18 The site is not within a Local **Air Quality** Management Area. The site is not near any major roads which form part of the roadside network surveyed for air quality.

5.19 The Local air quality management archive records have been reviewed. The latest records of ambient quality are:

- Nox (2015) <10ugm^{-3} as NO_2
- Sulphur dioxide, background concentration (2015) <2ugm^{-3}
- Carbon monoxide, max 8hr mean Background concentration (2010) 1.1 – 1.6 mgm^{-3}
- PM_{10} (2015) <13ugm^{-3}

5.20 The most recent archived records of ambient air quality for the site and locality indicate either lower than recorded pollutant levels or minimal levels (CO).

5.21 There have been a number of historic odour pollution incidents associated with the adjoining site and operation of an incinerator. These occurred during the late 1990's and early part of the first decade of the present century when Durga Environmental Ltd operated a carcass incinerator associated with the disposal of cattle under the Over Thirty Month Scheme which was instituted as a precautionary measure to eradicate BSE. That operation, which was controlled under an IPPC Authorisation issued by the Environment Agency, ceased more than a decade ago and Durga vacated the building which adjoined the knackery. There have been no pollution incidents associated with the operation of the carcass and pet incinerator operated by F Redfern and Sons on the adjoining site.

6 Handling of Materials and Process in the Installation

Activities that have been assessed that could lead to impact to land include:

- Raw material delivery

  The delivery of raw material into the reception hopper – spillage may occur giving rise to spillage of blood and animal tissue. The delivery will primarily be of whole carcasses, carried out within a building with sealed floors and which drain to a sealed system to collect such spillages and wash down waters, with traps to collect any residual raw material. Risks of land pollution from this activity are therefore expected to be minimal, now and in the future.

- Waste water storage area and transmission

  Whilst the storage tanks for waste water and recyclable water are new, over filling (if no level control equipment is fitted), vehicle strike (not possible in this location) or during collection or transmission activities could result in spillages. However any spills would be caught by the bund around the tanks, provided to the required capacity of 110% volume of the largest tank (of four) or enter the site's drainage system – this drains to a sump within its own concrete bund from where it is pumped to the storage tanks; except in the event of failure of the pipework, this is not an expected to cause land pollution now or in the future.

- Wash down waters

  Drain to a sealed system to collect spillages and wash down waters. Newly built, draining to a sump within its own bund and pumped to storage tanks, as referred to above (Waste Water). The potential for pollution is limited from this biodegradable material.

- Fuel (animal oil – tallow) storage area

  Spillage could occur during filling or emptying operations. However any spills would be caught by the bund around the tank, provided to the required capacity of 110% volume of the largest tank (of four). Additionally, tallow must be heated to remain liquid – the material would solidify in the event of spillage. Such spills would collect on the impermeable surface of the Installation or within the bund. The tank is not in a location where it could be struck by a vehicle.

- Meat and Bone Meal (MBM)

  MBM is a product of the process which is deposited into a trailer after drying (and cooling, to reduce dust and flammability). Spillage could occur during loading of the trailer, though unlikely during conveyance as augurs are enclosed. "Curtains" lowered into the trailer from the loading mechanism to retain the material will reduce the possibility and extent of any spillage. Any spillage will collect on the impermeable floor and be swept up or washed down and collected by the drainage traps. Pollution from this bio-degradable material is therefore most unlikely.

- Chemical use and storage

  The Company uses small quantities of cleaning chemicals on the site. The largest containers used are 25 litres for wash down chemicals. The use and handling of these chemicals is considered to be a low risk due to the nature and packaged volume, and that they will be kept in a secure area on the impermeable surface.

- Storage & Handling of Animal By-Products

  No animal carcasses or by-products will be stored on site – all raw material will be introduced into the Installation process as required, and capacity allows. All raw material will, therefore, be retained on the knackery/Intermediate Plant until required. There is no pollution risk from this source.

7 Surface Water and Foul Drainage

A plan of the site drainage is enclosed with the main PPC application as Document ECGE SM3.

No assessment or testing of the drainage system has been carried out to date, however the Company will test the system as it is installed.

8 ASSESSMENT OF LAND POLLUTION POTENTIAL

8.1 Current Status of Site

It is concluded that there is no existing pollution of the site. It is a previously undeveloped site and observations during construction have not revealed any pollution which may have migrated from adjoining land (the knackery).

8.2 Polluting Substances and Relevant Activities

A list of all substances used, stored or produced (or waste products from the process) on the site is contained within the table in Appendix A1. An assessment of their pollution potential has been made based upon their properties, toxicity and volume stored, used or manufactured.

8.3 Preventative Measures

The pollution preventative measures (physical infrastructure and those relating to testing, inspection and maintenance) for each relevant activity associated with the identified significant potentially polluting substances have been identified and their extent and condition assessed. The results of this work are shown in Appendix A2.

8.4 Assessment of the Likelihood of Land Pollution

Appendix A2 contains an assessment of the likelihood of future land pollution from the activities identified.

The assessment is that for the relevant activities at the Installation there is little likelihood that land pollution or leaks which pose a significant risk to the land will occur during the future life of the activity. No further reference data for the site need to be collected.

It should be noted that the drainage system (of the wash down waters) does not have a second or tertiary containment but it is still considered that there sufficient pollution prevention measure and there is little likelihood of

pollution. Drained wash down waters, which may include sedimentary material, i.e. blood and MBM, though traps should remove most of this, is fully biodegradable. The low risk that this material represents to the environment, specifically land and ground water, is recognised in its exemption for storage and land spreading, within defined parameters, within the amended waste licensing regulations, though the wash down waters with the waste water stream from this Installation will be removed from site for authorised disposal.

9 Land Pollution History

9.1 There is no record of any pollution to land at the site. GBPP have not been made aware of any reports of any pollution incidents occurring nearby or on the site which could have contaminated land.

9.2 The operations, whilst small scale, have the potential to give rise to minimal levels of ground pollution, principal contaminates are likely to have been liquid wastes arising from the delivery of animal carcases, e.g., blood, and waste water. These materials are fully bio-degradable and derived from abattoirs are still applied to land as an agricultural fertilizer. Pollution from these substance is therefore likely to be limited to short term upset in the ground's oxygen content – long-term pollution of the site form these substances is very unlikely.

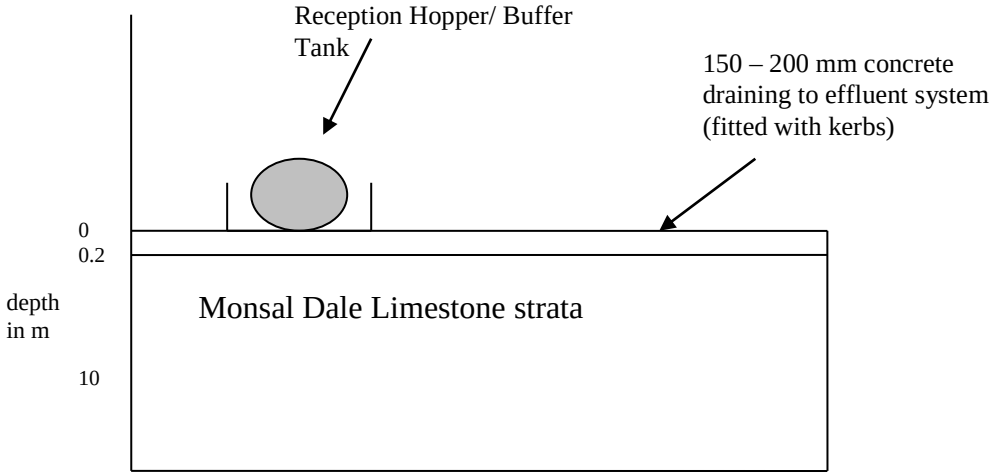
10 Summary and Conceptual Site Model

10.1 Introduction

The findings of the desk study and site reconnaissance (detailed above) have been used to develop the conceptual site model (CSM) for the site. Uncertainties in the CSM are identified and there significance discussed.

10.2 Graphical Representation of the Site

Graphical representations of the site model have been produced and are shown below



10.3 Uncertainties in the CSM

In developing this CSM the following assumptions have been made.

- It is assumed that the nature of the process and the materials, waste and products used or produced on site will remain the same or similar throughout its operation
- It is assumed that all hard standing areas shall be maintained in a reasonable condition

- The site has been excavated to the Rock Head
- There is no made ground on the site and all areas are now covered with concrete floors
- Hydro-geological parameters of the head material permeability and flow velocity; porosity and dispersivity are not typical of the head material

10.4 **Conclusions**

The outcome of using the above assumptions is that:

- Potential contamination sources have been identified within the Installation but there is no reasonable possibility of pollution to land occurring during the current and future operation of the installation.
- For most contamination, the potential impact to the ground will be limited due to the nature of processes undertaken at the site, the quantities of materials involved and the existing preventative measures in place.
- The Installation drainage system, which will not have secondary or tertiary containment, could allow the migration of pollutants to the ground underlying the site, if the new build system were to fail. As a result it is proposed that an integrity inspection of the drainage system be undertaken as part of future maintenance.

Appendix A – Data Assessment

A1 – List of Potentially Polluting Substances

Substance	Amount stored	Storage location	Properties	Toxicity, fate and behaviour in the environment
Blood	None – trace from spillage only	Not stored – spillage only	Water miscible liquid with high COD	Short term toxic effects, easily transmitted in aqueous environments Fully bio-degradable
Animal tissue	None – from spillage only	Not stored – spillage only and collected in traps	High COD	Short term effects Fully bio-degradable
Waste water	120 Te	External tanks in bund	High COD	Short term effects Fully bio-degradable
Wash down	60 Te	External tank in bund	Low COD	Short term effects Fully bio-degradable apart from trace elements
Tallow	60 Te	External heated tank in bund	Solid when cold, non-miscible as a liquid	Short term effect but easily retrieved if spilt
Cleaning Chemicals	Up to 50 litres in 25L containers	In secure store in building on impermeable floor	Caustic, water miscible liquid.	Short term toxic effects, easily transmitted in aqueous environments. Fully bio-degradable, apart from trace elements.
Meat and Bone Meal	Up to 25 Te	In trailer inside building	Dry, ground material – dust; potential flammability	Short term effect Fully bio-degradable

A2 - Assessment of the Likelihood of Land Pollution (Table 2A)

Site Operational or Site Zone	**Substance**	**Relevant Activity**	**Potential for Pollution from the relevant activity**	**1. Records of pollution**	**2. Existence of pollution prevention measures**	**Nature of Primary Containment**	**Testing and Inspection of Primary Containment**	**Nature of Secondary Containment**	**Columns continue on to table 2B**
Raw material delivery/input	Raw material – blood & tissue	1. Delivery by fork lift to reception hopper	Spillage	N/A	Yes	Reception hopper	Complaint to British Standard and APBR Regulations	Floors concreted. Site drains to storage tank via interceptor traps for tissue, little chance of waste entering surface water or land	→
		2. Flow to macerators, buffer tank and process equipment	Failure of delivery pipework	N/A	Yes	Pipework	Regular visual inspection as part of monitoring process	Impermeable hard surface	→

Table 2B Continued from table 2A	**Testing and Inspection of Secondary Containment**	**Nature of Tertiary Containment**	**Testing and Inspection of Tertiary Containment**	**Adequacy of pollution prevention measures Yes/No**	**Are the proposed integrity testing of pollution prevention measures Adequate Yes/No**	**Documented EMS to demonstrate operator management and competence with the relevant activity?**	**Little likelihood of Pollution?**	**Reasonable Possibility of Pollution?**
→	Floor area visually inspected after every fill and following any notified spill as part of EMS	None	None	Yes	Yes	Yes	Yes	No
→	Visual inspection	Surfaces are concreted. Site drains discharge to a closed system	Hard surfaces visually inspected and following any notified spill as part of EMS	Yes	Yes	Yes	Yes	No

A2 - Assessment of the Likelihood of Land Pollution (Table 2C)

Site Operational or Site Zone	Substance	Relevant Activity	Potential for Pollution from the relevant activity	1. Records of pollution	2. Existence of pollution prevention measures	Nature of Primary Containment	Testing and Inspection of Primary Containment	Nature of Secondary Containment	Columns continue on to table 2D
Hygiene And Chemical storage	Alkaline, Acid and caustic based detergents and general cleaners (50ltr and 25ltr)	Delivery to stores	Spillage during off-loading to enter drainage system	N/A	Yes	Containers	Visual inspection	Impermeable hard surface	→
		Storage	Failure of containment leading to spillage to enter drainage system	N/A	Yes	Containers	Visual inspection	Impermeable hard surface	→
		Use in process areas	Chemicals entering drainage system	N/A	Yes	Containers	Visual inspection	Impermeable hard surface	→

Table 2D Continued from table 2C	Testing and Inspection of Secondary Containment	Nature of Tertiary Containment	Testing and Inspection of Tertiary Containment	Adequacy of pollution prevention measures Yes/No	Are the proposed integrity testing of pollution prevention measures Adequate Yes/No	Documented EMS to demonstrate operator management and competence with the relevant activity?	Little likelihood of Pollution?	Reasonable Possibility of Pollution?
→	Visual inspection	Drainage to trade effluent	Proposed inspection	Yes	Yes	Yes	Yes	No
→	Visual inspection	Drainage to trade effluent	Proposed inspection	Yes	Yes	Yes	Yes	No
→	Visual inspection	Drainage to trade effluent	Proposed inspection	Yes	Yes	Yes	Yes	No

A2 - Assessment of the Likelihood of Land Pollution (Table 2E)

Site Operational or Site Zone	**Substance**	**Relevant Activity**	**Potential for Pollution from the relevant activity**	**1. Records of pollution**	**2. Existence of pollution prevention measures**	**Nature of Primary Containment**	**Testing and Inspection of Primary Containment**	**Nature of Secondary Containment**	**Columns continue on to table 2F**
Processing	Macerated material with High COD	Supply to process	Failure of supply pipe work	N/A	Yes	Pipework	Visual inspection	Impermeable hard surface	→
Installation site drainage system	Waste water, wash down, blood, food wastes with high COD	Drainage to storage tanks	Integrity breach in drainage leading to contamination of soil and ground water	N/A	Yes	Drainage pipework	Proposed inspection	None	→
Storage tanks	Tallow, waste water, wash down	Storage	Failure of tanks, leading to contamination of soil and ground water	N/A	Yes	Storage tanks	Fill meters & Visual	Bund	→

Table 2F Continued from table 2E	**Testing and Inspection of Secondary Containment**	**Nature of Tertiary Containment**	**Testing and Inspection of Tertiary Containment**	**Adequacy of pollution prevention measures Yes/No**	**Are the proposed integrity testing of pollution prevention measures Adequate Yes/No**	**Documented EMS to demonstrate operator management and competence with the relevant activity?**	**Little likelihood of Pollution?**	**Reasonable Possibility of Pollution?**
→	Floor areas visually inspected, monitoring of process and following any notified spill as part of EMS	Drainage system	Proposed	Yes	Yes	Yes	Yes	No
→	N/A	None	N/A	Yes	Yes	Yes	Yes	No
→	Visual inspection	None	None	Yes	Yes	Yes	Yes	No

A2 - Assessment of the Likelihood of Land Pollution (Table 2G)

Site Operational or Site Zone	**Substance**	**Relevant Activity**	**Potential for Pollution from the relevant activity**	**1. Records of pollution**	**2. Existence of pollution prevention measures**	**Nature of Primary Containment**	**Testing and Inspection of Primary Containment**	**Nature of Secondary Containment**	**Columns continue on to table 2H**
Drying area	MBM	1. Delivery of solids (MBM) to despatch trailer	Failure of containment leading to material spillage	N/A	Yes	Enclosed cooling auger	Visual inspection	Concreted floors	→
		2. Loading of trailer	Failure of containment leading to material spillage	N/A	Yes	Delivery equipment reception trailer	Visual inspection	Concreted floors	→
Electricity generation	Tallow	Electricity generation	Failure of containment leading to material seeping to land	N/A	Yes	Pipework	Visual inspection	Concreted surfaces	→

Table 2H Continued from table 2G	**Testing and Inspection of Secondary Containment**	**Nature of Tertiary Containment**	**Testing and Inspection of Tertiary Containment**	**Adequacy of pollution prevention measures Yes/No**	**Are the proposed integrity testing of pollution prevention measures Adequate Yes/No**	**Documented EMS to demonstrate operator management and competence with the relevant activity?**	**Little likelihood of Pollution?**	**Reasonable Possibility of Pollution?**
→	Visual	None	N/A	Yes	Yes	Yes	Yes	No
→	Visual	None	N/A	Yes	Yes	Yes	Yes	No