

Environmental Permitting (England and Wales) Regulations 2016
Application reference: EPR/BP3025SC/V003
Operator: QUALITECH ENVIRONMENTAL SERVICES LIMITED (QES)
Facility: Qualichem, Dock Road, West Float, Birkenhead, CH41 1DF

Additional Information Requested by the Environment Agency in relation to Form C3 Q1-

Demonstrate, in your own words, how the proposed changes comply with the relevant aspects of Best Available Techniques (BAT) and Appropriate Measures.

This should cover:

Waste acceptance procedures, Waste transfer and handling, Waste storage arrangements.

QES RESPONSE

This summary response should be read in conjunction with the 127 page document provided with the application ref "Part C2 Q3d EMS", in particular Appendix 1 Sections 4, 5 & 6 on pages 16 to 38 and Appendix 2 Qualitech IMS Manual pages 1 to 20 (pdf pages 101 to 120).

For the avoidance of doubt, the EMS document provided in support of the answer to Part C2 Q3d should also be regarded as a response to Part C3 Q1.

The waste types specified in the existing permit are restricted to prefixes EWC 13 01, 13 02, 13 03, 13 04, 13 05 and 13 07.

Wastes received with any of the foregoing 4 digit prefixes will not be mixed with any of the five other 4 digit prefix wastes.

The Chemical Waste: appropriate measures for permitted facilities guidance – published version 18 November 2020 is the relevant guidance for the EWC 13 XX XX wastes.

There is a lot of overlap between best available techniques (BAT) for waste installation facilities and necessary measures for waste operation facilities. The Environment Agency uses the term 'appropriate measures' to cover both sets of requirements.

The wastes are only received in bulk either from a permitted waste facility or direct from a waste producer(s) perhaps as part of a carrier's round. Bulk waste oil received from a permitted waste facility will be accompanied by a certificate of analysis. Waste received from other sources will be sampled and analysed in accordance with the procedures set out in the EMS document referred to above and as detailed in Appendices 1 & 2.

None of the accepted waste oils will be flammable and they will have a flash point greater than 66 degrees Celsius. Furthermore, these higher flash point liquids will not be stored at a temperature which is less than 20 degrees Celsius below their

flash point. Therefore, the Health & Safety guidance listed in paragraph 2, page 29 of 55 in Appendix 1 does not apply.

The EMS procedures relevant to waste transfer and handling and bulk storage are detailed in Section 4 of Appendix 1 with additional management procedures set out in Appendix 2 – IMS, which are certified to ISO 14001.

Bulk storage tanks and their secondary / tertiary containment measures will comply with the CIRIA 736 guidance, which is specified in Section 4 of the Agency's Appropriate Measures Guidance.

Legal footnote: the 'proposed changes' and this response document should be seen in context with documents Part C2 Q1a, Q2b.2 and Q6 Non-Technical Summary which were submitted with the variation application in August 2025