UMBRELLA ENVIRONMENTAL

PROTECTING YOUR BUSINESS

Appropriate Measures and Best Available Technique Assessment

Umbrella Environmental
9 Goldington Road
Bedford
MK40 3JY
Company Number:
13446157

Website: www.umbrella-environmental.co.uk
Email: andrew@umbrellaenvironmental.co.uk
Mob: 07498 671713

CIWM

Affiliated Organisation 2022

Together, we stand for a world beyond waste

Site Address:

Synergy Asset Services Limited

Merton Farm
Merton Lane South
Canterbury
Kent
CT4 7BA

Registered Office

Merton Farm
Merton Lane South
Canterbury
Kent
CT4 7BA

Application Reference:
EPR/FB3602HU/V002
Document Reference:
018.1_05_005
Issue Date:
26/01/2024

Document Control

Document Title	Reference	Client	Status
Appropriate Measures Assessment	018.1_05_005	Synergy Asset Services Limited	FINAL

Document History

Version	Issue date	Author	Checked	Description
D1	23/01/2024	AIL	AIL	Drafted for client review prior to submission to the Environment Agency.
V1	26/01/2024	AIL	AIL	Approved by client for submission.

CONTENTS

Tables

Figures

Drawings

Appendices

Terms and Definitions

Not all terms will be used in this document.

Term	Definition
Auditor	Person with the competence to conduct an audit.
Continual improvement	Recurring process of enhancing the environmental management system in order to achieve improvements in overall environmental performance.
Corrective action	Action to eliminate the cause of a detected nonconformity.
Document	Information and its supporting media.
Environment	Surroundings in which site operates, including air, water, land, natural resources, flora, fauna, humans, and their interrelation.
Environmental aspect (EA)	Elements of sites activities or products or services that can interact with the environment.
Environmental impact	Any change to the environment, whether adverse or beneficial, wholly or partially resulting from sites environmental aspects.
Environmental management system (EMS)	Part of sites management system used to develop and implement its environmental policy and manage its environmental aspects.
Environmental objective	Overall environmental goal, consistent with the environmental policy.
Environmental performance	Measurable results of sites management of its environmental aspects.
Environmental policy	Overall intentions and directions of sites related to its environmental performance.
Environmental target	Detailed performance requirement applicable to site or parts thereof, that arises from the environmental objectives and that needs to be set and met in order to achieve those objectives.
Interested party	Person or group concerned with or affected by the environmental performance of site.
Internal audit	Systematic, independent and documented process for obtaining audit evidence and evaluating it objectively to determine the extent to which the environmental management system audit criteria set by site are fulfilled.
Nonconformity	Non-fulfilment of a requirement.

Organisation	Site/Operator
EP	Environmental Permit.
NTS	Non-technical Summary.
ERA	Environmental Risk Assessment.
SCR	Site Condition Report.
EMS_OT	Environmental Management System and Operating Techniques. Compliant with Permit Condition 1.1.1.
FPP	Fire Prevention Plan.
NVMP	Noise and Vibration Management Plan.
OMP	Odour Management Plan.
Appropriate Measures	Appropriate measures are the standards that operators should meet to comply with their environmental permit requirements.
Site	Location of waste activities.
EA	Environment Agency
HSE	Health and Safety Executive
TCM	Technically Competent Manager

1 Introduction

This is the Appropriate Measures assessment that accompanies the application to vary from a bespoke waste activity to an Installation activity on behalf of Synergy Asset Services Limited, in accordance with Environmental Permitting (England and Wales) Regulations 2016 (as amended) and will be referred to as 'site' within this document.

1.1 The Site and Location

Site is located at Synergy Asset Services Limited, Merton Farm, Merton Lane South Canterbury Kent CT4 7BA. Grid reference :TR 15054 55108 (What Three Words: bunny.spit.dance).

Access to the site Merton Lane off of the B2068 (Nackington Road). The site itself lies to the south of Canterbury. It is located in an farm industrial area. The farm itself is active. There are other light commercial activities in neighbouring industrial units. Wider of this the site is surrounded by agricultural land used for arable crops.

The sites location is shown on Drawing 3 2 km Sensitive Receptors 018.1_09_006and the extant of the permit boundary on Drawing 1 Permit Boundary 018.1_09_001.

All sensitive receptors up to 2 km are identified on Drawing 2 Site Plan 018.1_09_004sensitive receptors of ecological importance and sites of cultural and natural heritage. A 10 km plan has been created to identify all European designated sites up to 10 km from the site Drawing 4 10 km Sensitive Receptors 018.1_09_007.

Figure 1 Site Location (Aerial Photo)

(Google Satellite)

Image in above shows the existing permit boundary and the hashed green area shows the proposed increase to the permit boundary.

1.2 Overview of Site Operations

The Merton Farm site is permitted for the receipt of used gas cylinders from a variety of locations including civic amenity sites and direct collections from users. Hazardous cylinders are stored on site prior to transfer to a suitable permitted facility for treatment and disposal/and or recovery with no more than 100 tonnes of waste hazardous cylinders stored on site at any one time. The site also accepts non-hazardous pressure vessels which are stored on site prior to transfer suitable permitted facility for treatment and disposal/and or recovery.

In addition, Synergy accept and treat, prior to onwards transfer for recovery, up to 300,000 fire extinguishers per annum as well as other non-hazardous inert cylinders. Treatment will be limited to the discharge of contents and dismantling by removal of valves and other parts to allow recycling of metals, plastics and rubber at other sites.

The activities on the site fall under the following R/D codes

Table 1 Permitted Activities

Schedule 1- Environmental Permitting Regulations		Limits of specified activity and waste types
Section 5.3 (a) (ii) - haz waste installation – physico - chemical treatment	R13: Storage of waste pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where the waste is produced) R5: Recycling/reclamation of other inorganic materials D15: Storage pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where the waste is produced) D9: Physico-chemical treatment not specified elsewhere in Annex IIA which results in final compounds or mixtures which are discarded by means of any of the operations numbered D1 to D8 and D10 to D12	Physical treatment including manual sorting and separation of hazardous and non-hazardous waste for disposal (no more than 90 tonnes per day) or recovery. The maximum quantity of hazardous waste that can be stored at the site shall not exceed 100 tonnes at any one time. Subject to any other requirements of this permit wastes shall be stored for no longer than 3 months. Treatment of fire extinguishers is limited to the bleeding of the contents of and dismantling by removal of valves and other parts from cylinders to allow recycling of the metals, plastic and rubber. Treatment of non-hazardous cylinders is limited to the bleeding of the contents of and dismantling by removal of valves and other parts from cylinders to allow recycling of the metals, plastic and

Section 5.4 (a)(ii) - non - hazardous waste installation – physico -chemical treatment	R4: Recycling/reclamation of metals and metal compounds R5: Recycling/reclamation of other inorganic materials R13: Storage of waste pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where the waste is produced) D9: Physico-chemical treatment not specified elsewhere which results in final compounds or mixtures which are discarded by means of any of the operations numbered D1 to D12 D15: Storage pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where the waste is produced)	rubber. Manual dismantling to include the use of hand powered hand tools such as angle grinder and plasma cutter to reduce fraction size of waste. Subject to any other requirements of this permit wastes shall be stored for no longer than 3 months.
Section 5.6 - temporary storage of hazardous waste.	R13: Storage of waste pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where the waste is produced)	Temporary Storage of hazardous waste
Waste Operation		
Storage and handling of waste	R13: Storage of waste pending the operations numbered R5 (excluding temporary storage, pending collection, on the site where it is produced).	From receipt of waste to dispatch off-site for recovery or processing.
Directly Associated Activity		
Fuel Storage/chemical Storage	Diesel Hydraulic Oils Lubricating Oils	2500 litres 2 drums up to 205 litre per drum. 2 drums up to 205 litre per drum.

2 APPRPROPRIATE MEASURES

Appropriate Measures:

"Appropriate measures" is a more general term that can be applied in various contexts, including environmental management, risk mitigation, and regulatory compliance. It refers to the actions or steps taken to address a specific situation or achieve a particular goal.

Environmental Compliance: Both BAT and appropriate measures are often employed to ensure compliance with environmental regulations. Industries may adopt BAT to meet regulatory standards, and appropriate measures may be taken to address specific environmental issues or challenges beyond what BAT prescribes.

Continuous Improvement: Both concepts emphasize the importance of ongoing improvement. Industries are encouraged to continuously update their technologies and practices to incorporate the best available techniques. Appropriate measures may also evolve over time to address changing environmental conditions or emerging risks.

Customization to Specific Situations: Appropriate measures can be tailored to the specific circumstances of a particular industry or facility. Similarly, BAT takes into account the specific characteristics of each industrial sector, recognizing that there is no one-size-fits-all solution.

In summary, while there isn't a direct comparison between BAT and appropriate measures, they share common ground in their application to environmental management, regulatory compliance, and the need for continuous improvement in industrial practices. The term "appropriate measures" is broader and can encompass a range of actions, of which adopting the best available techniques may be one specific example.

This is an assessment of the managerial procedures and technology that demonstrate the operator and site are compliant with BAT/Appropriate Measures.

3 PRE ACCEPTANCE OF WASTE

3.1.1 Pre-acceptance procedures

Prior to delivery to the site, the waste producer or holders are required to provide the following information of the waste to allow Synergy to assess its suitability for acceptance:

- The quantity of waste to be imported.
- The contents of the canisters, including named product and propellant.
- Whether the canisters are fully discharged or partially discharged.
- Hazardous properties posed by contents of canisters; and
- Construction material of canisters (e.g., steel, aluminium or mixed).

Synergy do not accept wastes onto the site unless the above information is established.

If the information provided demonstrates that the waste is acceptable, arrangements are made to deliver the waste to the site. Prior to delivery, any gas that present within any of the waste gas cylinders are discharged by the waste producer or holder. Furthermore, Synergy inform the waste producer or holder to place different waste streams into different containers to prevent cross contamination between incompatible materials.

All records relating to the pre-acceptance are kept for cross-reference a verification at the waste acceptance stage. These records are kept for a minimum of 3 years.

4 WASTE ACCEPTANCE PROCEDURES

4.1 Waste Acceptance Procedures

4.1.1 Pre-acceptance procedures

Prior to delivery to the site, the waste producer or holders are required to provide the following information of the waste to allow Synergy to assess its suitability for acceptance:

- The quantity of waste to be imported.
- The contents of the canisters, including named product and propellant.
- Whether the canisters are fully discharged or partially discharged.
- Hazardous properties posed by contents of canisters; and
- Construction material of canisters (e.g., steel, aluminium or mixed).

Synergy do not accept wastes onto the site unless the above information is established.

If the information provided demonstrates that the waste is acceptable, arrangements are made to deliver the waste to the site. Prior to delivery, any gas that present within any of the waste gas cylinders are discharged by the waste producer or holder. Furthermore, Synergy inform the waste producer or holder to place different waste streams into different containers to prevent cross contamination between incompatible materials.

All records relating to the pre-acceptance are kept for cross-reference a verification at the waste acceptance stage. These records are kept for a minimum of 3 years.

4.1.2 Acceptance Procedures

All vehicles delivering waste are licensed waste carriers and each delivery must be accompanied by the Waste Transfer Note (for non-hazardous waste) or a Hazardous Waste Consignment Note (for hazardous waste) consistent with fulfilling the company's responsibilities under the Duty of Care Regulations. Before the waste vehicle arrives on site, checks are made to ensure that the waste carrier is properly licensed. This information can be checked by the following methods:

- By phoning the Environment Agency on 03708 506 506 and requesting an instant Waste Carrier Validation Check; or
- Checking online on the Environment Agency's waste carrier register on their website.

To ensure that the transport of the canisters does not pose any potential risks, all waste carriers must also demonstrate that they meet the requirements of the Carriage of Dangerous Goods and Use of Transportable Pressure Equipment Regulations (CDG) and the European Agreement Concerning the International Carriage of Dangerous Goods by Road (ADR). The waste carrier also needs to demonstrate that they have received appropriate ADR training.

By undertaking ADR training, the driver is knowledgeable on the type of cylinders that need to be segregated in transit. Furthermore, any driver that undertakes a waste collection on behalf of Synergy receives a detailed inventory of the waste pressure vessels that are scheduled to be collected. This information is used by the driver to arrange how the canisters are loaded on to the vehicle and therefore minimise the risk of reactions to occur between incompatible substances.

Upon arrival on site, all drivers of waste delivery vehicles are to report to the site office and provide documentation of the waste that's being delivered to the site to ensure it corresponds with the information provided during the pre-acceptance stage and therefore complies with the conditions of the environmental permit.

If the document checks show that the waste is acceptable, the driver is to report back to the waste delivery vehicle and be directed to the waste reception area as shown on Drawing 2 Site Plan 018.1_09_004. As noted on the Site Plan, the waste reception area is situated outside and therefore provides sufficient ventilation whilst the canisters are being loaded/unloaded from the waste delivery vehicle.

At the waste reception area, the cylinders are unloaded from the waste delivery vehicle and are subject o the following visual checks:

- Check the waste to ensure that it is as expected, complies with the site's waste acceptance criteria and is consistent with accompanying paperwork and the site's environmental permit;
- Check the condition of the containers in which the canisters have been packaged, in order to identify any that are damaged or unsuitable for handling and storage.
- Inspect the load to identify leaking canisters and potentially explosive accumulations of gas; and
- Check the labelling of the containers in which the canisters have been packaged to ensure that it accurately identifies and describes the waste, removing any labels that do not relate to the waste.

If the visual checks show that the waste canisters correspond with the information provided by the waste delivery driver, and the waste producer/holder during the pre-acceptance stage, the site operatives are to proceed to label each container that holds the waste cylinders with a contents label with a corresponding EWC and hazardous diamond which will be logged in the Synergy collection log on site. Information that was provided during the pre-acceptance stage may also be referenced to facilitate this process.

Once labelled, the waste pressure vessels are transferred to the relevant waste storage area as shown on Drawing 2 Site Plan 018.1_09_004. All waste cylinders are handled using forklift trucks and are only to be undertaken by site operatives who are trained and licensed to do so.

Synergy informs the waste producer or holder to place different waste streams into different containers to prevent cross contamination between incompatible materials. In the event that a mixed load is delivered to the site, reference is to be made to the British Compressed Gas Association's (BCGA) Technical Information Sheet (TIS) titled 'Technical Information Sheet 6: Cylinder Identification (Appendix 9 Cylinder ID Pack). Colour Coding and Labelling Requirements'. This document notes that all gas cylinders are required to be labelled to indicate the

contents of the cylinder and comply with the requirements of the Classification, Labelling and Packaging Regulations and The Carriage of Dangerous Good and use of Transportable

Pressure Equipment Regulations. As such, in the event that the cylinders are delivered as a mixed load, site operatives should try to identify any labelling on the canisters in order to confirm the nature of the waste. If, however, the labelling has

been removed, the TIS notes that gas cylinders are generally colour coded at the shoulder or the top of the canister to specify its properties. As such, site operatives can refer to any colour coding that is established on the cylinders as a guide to identify the relevant storage area.

Wastes that are not deemed acceptable are rejected. Furthermore, in the event that a mixed load is delivered the site and there is uncertainty in identifying the nature of the waste, it is to be treated as an unauthorised waste and will be rejected.

5 WASTE STORAGE AND TREATMENT

5.1 Storage Areas

5.1.1 Storage Arrangements

As detailed on the Drawing 2 Site Plan 018.1_09_004, hazardous and non-hazardous wastes are stored within segregated areas. All waste commodities are segregated into individual bays within assigned storage areas. Hazardous waste streams are kept sperate from non-hazardous wastes through a 2-meter segregation. All hazardous wastes are stored under sheltered roofing with an open front and back to allow for sufficient ventilation in the event of an unlikely build-up of an explosive atmosphere. Synergy have also taken extra precautions since the non- hazardous wastes that border either side of the hazardous storage area, are container extinguisher dry powder stores and un-processed fire extinguishers. This means that not only is the neighbouring waste inflammable, but it is also a fire suppressant and would therefore help to contain and supress any potential fire that may arise within the hazardous stores acting as a fire break.

Waste cylinders are stored within IBCs in the relevant waste storage areas as shown on Drawing 2 Site Plan 018.1_09_004.

The IBCs comprise an open top and are situated outside to ensure sufficient ventilation is provided to prevent the build- up of combustible gases. Synergy also undertakes precautions to ensure that the risk of combustion is minimised on site. Synergy ensure that containers used to store waste canisters will not be overfilled which may result in the canister becoming actuated and lead to an accidental discharge of contents when the containers are stacked.

The storage areas for the waste materials comprise a roofed structure that comprise metal sheeting. This minimises contact with incidental rainfall that may result in an increased risk of corrosion. Furthermore, the IBCs have a series of holes (between 4 to 5 holes per container) drilled at thebottom measuring 1 inch in diameter. This allows any rainwater that may collect in the IBC to drain out and further minimise the risk of corrosion.

Plastics and rubber that are recovered from the treatment process are stored within a designated RoRo container (as shown on Drawing 2 Site Plan 018.1_09_004). Ferrous metals are stored within the same type of IBCs that are used to store waste gas cylinders and are situated within the designated non-hazardous waste storage area (as shown on **Error! Reference source not found.**). Non-ferrous metals are stored within sealed battery containers which are stored within an ISO container located to the south of the site.

To ensure that there is no cross contamination or reactions between incompatible materials, each waste stream is stored within separate containers which are segregated in to designated storage areas (as shown on Drawing 2 Site Plan 018.1_09_004). Each storage area is clearly marked to inform site operatives what waste is stored within each storage area to ensure that incompatible materials are not placed in the wrong areas.

5.2 Stock Management

To ensure that specified limits for hazardous and non-hazardous wastes are not exceeded, effective stock management procedures are implemented.

As part of the waste acceptance procedures, details regarding the type of waste, quantities and date of receipt are recorded and maintained within the site office. This information is reviewed in line with the site's remaining storage capacity and details of waste collections to ensure that the site does not exceed the proposed storage limits.

This information is used to ensure that the waste cylinders are not stored on site for prolonged periods. With reference to the Environment Agency's 'Guidance for the storage and treatment of aerosol canisters and similar packaged wastes' document, it is advised that canisters should not be stored on site for no longer than 3 months. At Merton Farm, gas cylinders are generally stored on site for two weeks prior to being transferred off site for disposal/and or recovery. This is managed by using the information that is generated from the waste acceptance procedures.

In the event that the site reaches the maximum storage capacity for hazardous and or/non-hazardous waste, Synergy will not make any arrangements to bring any more waste to the site until such time the waste that's currently stored on site is transferred off site to provide sufficient capacity to allow more waste to be delivered to the site.

To ensure that the total storage limit for non-hazardous waste is not exceeded, recyclables from the waste treatment process are collected and transferred off site every two weeks. However, in the event that the site reaches the maximum limit for non-hazardous waste between these collections and recyclables are found to be stored on site, Synergy may make arrangements to transfer the recyclables off site to provide capacity to accept additional waste fire extinguishers/gas cylinders if necessary.

All cylinders that are stored on site are visually inspected on a regular basis to ensure the continuing integrity and fitness for purpose. In the event that a pressure vessel is identified that may be susceptible to corrosion within the two-week storage period, the canister will be prioritised for onward transfer to minimise the risk of corrosion. Furthermore, in the event that any damage breaches the integrity of the canister so that it no longer meets the required standards, the canister will be subject to the waste rejection procedures.

5.3 Waste Treatment – Non-Hazardous Fire Extinguishers & Cylinders

Synergy treat non-hazardous waste fire extinguishers and cylinders prior to onwards transfer for recovery. This activity is carried out in a designated area that is located to the south of the site see Drawing 2 Site Plan 018.1_09_004.

The treatment of fire extinguishers is limited to the discharge of the contents of the extinguisher and dismantling by removal of vales and other parts of the cylinder. This allows the recovery and onwards recycling of the metals, plastic and rubber at a suitably authorised facility.

The contents of water and foam extinguishers are discharged into sealed, closed-top IBCs prior to disposal off site at an appropriately authorised waste treatment facility. The IBCs are situated in a designated area as shown on Drawing 2 Site Plan 018.1_09_004 and provide a maximum storage capacity of 1,000 litres.

The contents of dry powder extinguishers are discharged into sealed bags which are then stored in a sealed and lockable.

20 ft ISO container before being transferred off site to a suitable permitted facility for disposal. Different types of powder are stored separately to prevent cross contamination between the powders. The container for the storage of fire extinguisher powder is situated in a designated area Drawing 2 Site Plan 018.1_09_004.

In terms of recyclables that are recovered from the treatment process, plastics and rubber are stored within a designated 40-yard Roll On, Roll Off (RoRo) skip as shown on Drawing 2 Site Plan 018.1_09_004. With reference to the Environment Agency's Waste Conversion Factors spreadsheet (document reference LIT 10134) it has been noted that 40-yard RoRo containers are capable of providing a storage capacity of approximately 30.58 tonnes (or 30.58m3). However, it is unlikely that these containers will reach maximum capacity at any one time.

Ferrous metals are stored within open top IBCs which are situated within the designated non-hazardous waste storage area (as identified on the Drawing 2 Site Plan 018.1_09_004) prior to transfer off site. The IBCs that are used to store non-ferrous metals are the same as those that are utilised to store waste non-hazardous gas canisters.

With regards to non-ferrous metals, these are stored within sealed battery containers which are stored within an ISO container located to the south of the site as shown on the Drawing 2 Site Plan 018.1_09_004). These containers are clearly labelled to inform site operatives that only non-ferrous metals can be stored in these containers. A limit of 2 tonnes of non-ferrous metals will be stored on site at any one time. This volume forms part of the 15 tonnes limit that has been assigned to the recyclables.

Recyclables from the waste treatment process are collected and transferred off site every two weeks to a suitable permitted facility for recovery or if necessary, disposal.

Given that the proposed treatment process comprises the discharge of water and foam extinguishers, the waste treatment area benefits from a impermeable surface and a drainage system (as detailed on Drawing 5 Drainage Plan 018.1_09_009to manage any surface water that maybe generated from the treatment process. As detailed on the Drawing 5 Drainage Plan 018.1_09_009), any surface water that is generated in this area will drain towards an underground drain which will then flow towards an underground interceptor tank

6 DRAINAGE

Drainage is shown on Drawing 5 Drainage Plan 018.1_09_009.

.

7 TRAINING FOR SITE STAFF

7.1 Training Needs Assessment

All new and existing site staff are subject to a specific training regime based on their responsibilities at the site to ensure all operations are carried out without harm to the environment or amenity of the surrounding area. Training in all aspects of the site and waste operations at the site with regard to the individual responsibilities of the site staff will help to prevent incidents occurring which may have an adverse impact on the environment and/or the employees and their co-workers.

7.2 Emergency Procedures Training

In addition to normal operating conditions as specified in the site rules, employees must also be trained in dealing with eventualities which may occur outside the scope of normal operating conditions, so they are aware of how to deal with these situations in advance of an occurrence.

7.3 Recognition of Waste Types Training

All employees will be given induction training and subsequent training to identify waste types which are permitted for acceptance at the site under the site's Environmental Permit (EP) and those wastes which are not. This will include specific training to identify those common wastes which may be found following deposit and are not permitted at the site and will also include more obscure wastes and how to handle these wastes safely. All employees will be advised that they will refer any unrecognisable or unknown wastes to site manager/TCM, who will, in turn, follow procedures outlined in the EMS and/or contact the EA to agree a suitable method for removal.

This training will be provided to all site users who handle waste on site and those in charge of administration and reporting. In-depth training will also be provided to drivers responsible for collecting wastes from the site of production. They will be trained to identify any wastes not covered by the EP for the site and inform the producer that an alternative facility must be sought for any non-compliant wastes.

Staff will also be trained in appropriate measure procedures ensuring only the following EWC codes are accepted on site.

Table 2 List of wastes

Waste code	Description
15 Waste packaging, absorbents, wiping cloths, filter materials and protective clothing not otherwise specified	
15 01	**packaging (including separately collected municipal packaging waste)**
15 01 04	metallic packaging (canisters only)
15 01 10*	packaging containing residues of or contaminated by hazardous substances (canisters only)
16	**WASTES NOT OTHERWISE SPECIFIED IN THE LIST**
16 01	**end-of-life vehicles from different means of transport (including off-road machinery) and wastes from dismantling of end-of-life vehicles and vehicle maintenance (except 13, 14, 16 06 and 16 08)**

16 01 03	end-of-life tyres
16 Wastes not otherwise specified in the list	
16 05	**gases in pressure containers and discarded chemicals**
16 05 04*	gases in pressure containers (including halons) containing hazardous substances.
16 05 05	gases in pressure containers other than those mentioned in 16 05 04.
16 06	**batteries and accumulators**
16 06 01*	lead batteries
16-06-02*	Ni-Cd batteries
16-06-03*	mercury-containing batteries
16 06 04	alkaline batteries (except 16 06 03)
16 06 05	other batteries and accumulators
20	**MUNICIPAL WASTES (HOUSEHOLD WASTE AND SIMILAR COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL WASTES) INCLUDING SEPARATELY COLLECTED FRACTIONS**
20 01	**separately collected fractions (except 15 01)**
20 01 33*	batteries and accumulators included in 16 06 01, 16 06 02 or 16 06 03 and unsorted batteries and accumulators containing these batteries
20 01 34	batteries and accumulators other than those mentioned in 20 01 33

7.4 Plant and Equipment Preventative Maintenance Training

This training is provided specifically for the vehicle and plant operators in order to ensure that all plant and machinery is checked regularly to prevent any occurrences which may lead to any adverse impacts on the environment or human.

The same training will be provided to senior management enabling a dual-level maintenance programme.

7.5 Duty of Care Training

All employees dealing with consignments of waste will be trained in the completion of Duty of Care Waste Transfer Notes and Consignment Notes .

7.6 Plant Operation Training

Any employees who are required to operate loading or treatment plant for the movement or processing of waste will be required to undertake the necessary qualifications for the operation of the specific item of plant in question. This will be required prior to operating the plant and will be obtained through necessary externa certification programmes.

Regardless of general plant operation certification, all operatives will be fully inducted in the operation of the specific make and/or model of plant used on site.

7.7 Permit and EMS Training

All employees will be inducted into the operating conditions as prescribed in the EP for the site. Whilst much of the above training will provide specific guidance on many aspects of these documents, all employees will be made

aware of the location of the EP in the site office. All managerial positions will be made fully aware of the sites operating conditions.

8 MONITORING

8.1.1 Point Source Emissions to Air

There are no point source emissions to air as a result of operations.

8.1.2 Point Source Emissions to Groundwater

There are no point source emissions to groundwater as a result of operations.

8.1.3 Point Source Emissions to Surface Water and Sewers

There are no point source emissions to surface water or sewer as a result of operations.

8.1.4 Fugitive Emissions

Fugitive emissions have been identified as a potential environmental risk resulting from operations, as detailed in the Environmental Risk Assessment.

8.2 General Management

The company have detailed written procedures and recording systems covering all aspects of site and company operations.

8.3 Plant and Equipment, Preventative Maintenance

Site management will undertake or delegate additional preventative maintenance checks on a daily basis to ensure, where possible, the machinery is mechanically sound, as described in the section below.

Fuels and combustible liquids from site vehicles (forklift trucks etc.) will be controlled by ensuring each vehicle has undergone the relevant preventative maintenance checks.

Any spillages of fuel will be cleared immediately by depositing sand or absorbents on the affected area and removed to the quarantine area or to a dedicated skip to await removal to a suitably permitted facility.

All items of plant and equipment (and any additional items of plant which may be hired in to cover busier periods) are subject to preventative maintenance checks to ensure their safe operation and to prevent any potential situations which may give rise to faults or malfunction. A preventative maintenance and fire used in the FPP.

Much of the plant and equipment on site and all vehicles in the fleet are subject to annual manufacturer maintenance to ensure proper working order in the form of service contracts. site manager/TCM will undertake or delegate additional preventative maintenance checks on a more frequent basis to ensure i.e. daily, before, during and at the end of each working day to ensure (where possible) the machinery is mechanically sound. These checks will be carried out using the preventative maintenance checklist shown in Appendix 7 Maintenance Scheduleand any results which are flagged as needing attention will also be recorded in the site event log.

8.4 Accidents and Incidents

Any accident or incident that has caused, is causing, or may cause significant pollution will be recorded.

These will be investigated by the TCM or senior management and where action is identified as being required, this will be recorded; responsibility will be allocated; preventative or corrective actions specified and completion required to an clearly defined time scale.

Accident Management

- All necessary measures are taken to prevent the occurrence of accidents. The types of accidents and the potential environmental consequences associated with them have been identified in the Environmental Risk Assessment that accompanies this documentation.
- It is considered that the most significant risk associated with the site is the unauthorised acceptance of non- compliant waste types. The waste acceptance procedures listed in Section 2 of this document aim to control and minimise this risk.

8.5 Fire Control

8.5.1 General Site Procedures

The following measures are implemented on site to minimise the fire risk.

As part of the waste acceptance procedures, all cylinders are visually inspected to establish the condition of the cylinder including any potential leaks. If any cylinder is found to be leaking, it is to be rejected.

All waste storage areas are inspected on a regular basis using a suitable flammable gas detector in order to identify any leaking canisters. If a canister is found to be leaking, it is to be removed from the storage area and stored within the quarantine.

Given that the waste storage areas are situated outside, there's the potential for steel pressure vessels to rust which can result in an increased risk of gas leaks. As such, site operatives remain vigilant during the waste storage inspection and during operating hours to identify any pressure vessels that may be affected by rusting. Any cylinders that are found to be rusting are prioritised for onward treatment and disposal and/or recovery.

Given that the site accepts canisters that are manufactured from different materials (i.e. aluminium, steel, mixed etc.), there is a potential risk of thermite spark between the canisters during handling and storage activities. Each waste stream is stored within separate containers to prevent cross contamination. This procedure also considers the construction material of the canister to prevent the risk of thermite spark. For example, non-hazardous waste canisters that are manufactured from aluminium are stored in one IBC and non-hazardous waste canisters manufactured from steel are stored in another.

The operator enforces a strict 'No Smoking Policy' on site and prohibits the use of equipment that may be considered as a potential source of ignition including mobile phones within the DSEAR highlighted zones. Hot

works and the use of naked flames are also be prohibited within these zones and must be restricted to designated processing areas away from the storage of waste or gas cylinders.

To ensure that this is reinforced, all visitors, contractors and site operatives are required to report to the site office upon arrival and confirm whether they are in the possession of any items that may be considered as a potential ignition source. If so, they will be required to leave such items in site office where they will be kept throughout the duration of the site visit. Clear signage is also established at the site entrance and across the site to inform all visitors, contractors and site operatives of prohibited activities.

Furthermore, all visitors, contractors and site operatives are required to undertake a site induction where they are informed of the procedures and measures in relation to fire prevention and response.

All inductions are signed off by an on-site Manager and the participant and a record is maintained in the site office for reference. Such records are monitored on a regular basis to ensure that all staff, contractors and regular visitors are trained in the latest measures and procedures. In the event that the operator applies any changes to the site procedures, all staff, contractors and regular visitors will be required to complete a refreshed induction.

In light of the above, it is considered that the most likely source of ignition from on-site activity will be from mobile plant and vehicles delivering the cylinders to the site. To minimise the risk of combustion, all mobile plant and vehicles are maintained in accordance with the Planned Preventative Maintenance Programme (**Error! Reference source not found.**). In addition, all vehicles and mobile plant are required to switch their engines off when cylinders are being loaded/unloaded from the vehicle. In addition, all mobile plant is specially adapted for use in flammable atmospheres to ensure that there is no risk of combustion when the plant is moving any leaking canisters on site.

At the end of the day, vehicles and mobile plant are stored within designated areas as shown on the Drawing 2 Site Plan 018.1_09_004. As noted on the Site Plan, a minimum separation distance of 6 m is maintained between the HGV/mobile plant parking area and the non-waste LPG storage area to minimise the risk of combustion from the vehicle exhausts. This is reinforced by site operatives who direct HGV/mobile plant drivers when parking.

Firefighting equipment is kept in an appropriate location as advised by the Compliance Manager or the local Fire Service. Where appropriate, mobile plant and vehicles are fitted with firefighting equipment. All firefighting equipment is kept in good condition, unobstructed and is serviced at least once a year by a competent person.

Any fire on the site is to be treated as an emergency and will be extinguished at the earliest opportunity. If necessary, the Fire Service will be summoned. Any incidents of fire will be reported to the EA and recorded in the Site Diary.

In addition to the measures detailed above, Synergy operates in accordance with a Fire Prevention Plan (FPP).

which solely relates to combustible recyclable materials that are recovered from the waste treatment process.

8.5.2 Fire Detection System

Synergy have installed industrial outdoor rated fire detection systems which will include outdoor rated smoke detectors and a CCTV system which will be monitored in the site office by staff to identify any potential fire risks in areas that are not instantly visible to on-site workers. The location of the smoke detectors and CCTV cameras are identified on the Drawing 2 Site Plan 018.1_09_004 and Drawing 6 FIRE ALARM - RCC AREAS.

In the event that the smoke detectors identify any smoke on site, an alarm will be activated which will notify all on-site workers. Once the alarm has been activated, the Site Manager and the designated fire marshal will assess the area and employ the most appropriate course of action. If necessary, the designated fire marshal will contact the Local Fire Service who will advise on the most appropriate course of action.

Given that the site will not operate 24 hours a day, Synergy have considered the risks to arson and vandalism outside operating hours. In order to minimise these risks, a proximity alarm system is installed to cover the perimeter of the site as shown on the Site Layout. The system is designed to detect irregular movements along the site perimeter where trespassers may gain access. In the event that the alarms detect a security breach, the system will send a notification to designated members of staff as well as the security provider.

Following notification, the designated members of staff can remotely access the CCTV cameras and will assess the situation on site. If a threat is detected, the emergency services will be informed, and an audible alarm will be activated on site to deter any trespassers from any further action.

The fire detection and security systems mentioned above are subject to regular maintenance by an appropriate UKAS accredited third party scheme in accordance with the manufacturer's requirements. This forms part of the site's Planned Preventative Maintenance programme (Appendix 7 Maintenance Schedule).

As detailed on Drawing 2 Site Plan 018.1_09_004 the storage areas for the waste gas cylinders are adjacent to the waste reception and sorting/distribution area. During operating hours, two site operatives are assigned to these areas and will be required to monitor the waste gas cylinder storage areas. This helps to identify any potential fire risks at an early stage and allow a prompt response to minimise the risk of a fire occurring.

During the operating hours, there must also be at least one fire marshal on site who will be trained in managing an emergency fire situation. The Yard Manager will inform the fire marshal of the types of gas cylinders that are stored on site and therefore will be aware of the potential fire risks. During the working day, the Yard Manager visually inspects all areas where any gas cylinders are stored. This helps to identify any potential fire risks at an early stage and allow fora prompt response to minimise the risk of a fire occurring.

8.5.3 Fire Fighting

All pressure vessels and IBCs are handled using forklift trucks. This helps to facilitate active firefighting gas the forklift trucks can be used to move IBCs away from any potential fires and therefore minimise the risk of fire

spreading. This will only be undertaken if the Local Fire Service have advised that it is safe to do so and by staff who are trained and licensed to operate the plant.

Firefighting equipment is located in the site office and at each emergency exit. All firefighting equipment is compliant with the product specification.

Daily checks of all firefighting equipment are incorporated into the site diary checklist. In the event that any firefighting equipment is identified to breach the required standards, necessary remedial work will be undertaken as soon as practicable. Any non-conforming equipment will be clearly marked to inform staff and prevent use until the necessary remedial works are complete.

All staff are made aware of the location of all firefighting equipment and are adequately trained in their correct use.

In addition to firefighting equipment, the site is equipped with a water storage tank that stores 20,000 litres of water. The tank is equipped with a diesel water pump and fire hose/nozzle combination which can be used by the local fire service to suppress any fires that may occur on site. The location of the water storage tank is identified on the Drawing 2 Site Plan 018.1_09_004.

The water storage tank and its accompanying features are subject to regular maintenance procedures in accordance with the manufacturer's requirements to ensure continuing integrity and fitness for purpose. All site operatives are also adequately trained to ensure that they are competent to operate the suppression system in the event of a fire

8.6 Monitoring

If required all monitoring is carried out by trained personnel and recorded on suitable forms or on digital media which is available to site managers for checking and reviewing site operations. Information is readily available to regulators on request.

Monitoring could b a result of complaint or request by the EA for dust, noise and vibration.

8.7 Emergency Planning

The EMS_OT and FPP will have detailed Emergency plans these plans are reviewed at least every two years or sooner following any incident.

Drills are undertaken regularly at least every 6 months to test emergency procedures and ensure staff are confident of the actions to take in the event of an emergency. All drills are documented and any problems highlighted are used to review the procedures if necessary.

9 RAW MATERIALS AND JUSTIFICATIONS

Table 3 Energy use

Schedule 1 activity	Description of raw material and composition of raw material	Maximum amount daily	Annual throughput	Description of how raw material is used including main hazards	Justification for use (Form B3 Q6d)	Reducing waste arising from raw materials
Section 5.3 (a) (ii) - haz waste installation – physico - chemical treatment	Electricity	Unknown as new site will be monitored for first year to identify.	Unknown as new site will be monitored for first year to identify.	No hazards associated other than slips, trips, falls etc.	Treating waste for further recovery to reduce waste to landfill. Segregation of hazardous and non-hazardous waste	N/A
Section 5.4 (a)(ii) - non -hazardous waste installation – physico - chemical treatment	Electricity	Unknown as new site will be monitored for first year to identify.	Unknown as new site will be monitored for first year to identify.	No hazards associated other than slips, trips, falls etc.	Treating waste for further recovery to reduce waste to landfill. Segregation of hazardous and non-hazardous waste	N/A
Section 5.6 - temporary storage of hazardous waste	N/A	N/A	N/A	N/A	N/A	N/A

Mobile Plant	Description of raw material and composition of raw material	Maximum amount daily	Annual throughput	Description of how raw material is used including main hazards	Justification for use (Form B3 Q6d)	Reducing waste arising from raw materials
Mobile plant	Diesel	Unknown as new site will be monitored for first year to identify.	Unknown as new site will be monitored for first year to identify.	Fuel/engine oil for fork lift truck. Main hazard would be spillages.	Moving waste around site to enable treatment/transfer.	N/A
Fixed plant	Electricity	Unknown as new site will be monitored for first year to identify.	Unknown as new site will be monitored for first year to identify.	Moving parts Main hazard would be spillages.	Processing waste.	N/A

10 WASTE RECOVERY OR DISPOSAL

Synergy Asset Services Limited are committed to pushing the wastes they handle and produce as far up the waste hierarchy as possible and the specialisation in low volumes of difficult to handle wastes has given a particular emphasis to this ethos. Ensuring they meet the requirements of S5.06 section 2.6.

The company record and analyse all energy use and have policies and procedures in place which emphasise the need to avoid unnecessary use and to identify savings and efficiencies, meeting the requirements of S5.06 Section 2.7 as shown Table 3 Energy use

11 CLOSURE AND DECOMMISSIONING

During the lifetime of Synergy Asset Services Limited operation of the permitted site they will maintain records pertaining to the condition of the site. This will include information regarding any environmental incidents, improvements or changes to containment or abatement features, records of monitoring events, or any other details which may have impact on the site's condition.

This information will be used to support a permit surrender application when the site operations cease.

11.1 Site Closure Procedures

In the event that Synergy Recycling decide to close the Merton Farm site, steps will be taken to ensure that the site and existing land remains in an environmentally sound condition for reuse. In this event the TCM, Sam Roud, would inform the EA of Synergy's intentions and officially request a permit surrender application whereby the requested information and fees will be supplied to ensure a timely application completion. Only when the site is confirmed to be de-registered with the EA will Synergy take vacate the land fully. In order to ensure that the environment is preserved, the site will be compartmentalised as follows:

1. Drivers will cease to collect waste
2. Ongoing Waste processing will be completed so that all waste is ready for off-take
3. Quarantined Waste will be prioritised for offtake and disposal
4. Followed by hazardous waste
5. Followed by non-hazardous waste
6. Followed by owned goods
7. Followed by operational machinery and infrastructure
8. The last Synergy Assets to be removed will be security and perimeter features to best maintain site security and prevent third party fly-tying or squatting.

11.2 Site Condition Report

A Site Condition Report (SCR) has been produced as part of this application, site condition report 018.1_05_006.

11.3 Decommissioning Plan

A Decommissioning Plan has been prepared meeting S5.06 section 2.11 and is shown below. The plan follows the general principles as detailed below:

- If the site is to be dismantled all equipment, buildings etc. will be disposed of having full regard to the waste hierarchy.
- Buildings and pipe work will be checked and any infrastructure likely to contain asbestos material will be inspected and removed only using suitably authorised contractors.

- The dismantling and re-use of the majority of the equipment through sale to interested third parties the remainder to be scrapped; and
- The scrapping of the majority of the equipment probably through a single contractor with only a small proportion salvaged for re-use at some point in the overall process.

11.4 Sequence of Decommissioning

Final use, after the final consignment of waste has been despatched from the site, electrical systems will be isolated and locked off leaving only lighting and what circuits are considered necessary for on-going inspection and maintenance in place. All systems will be double checked and labelled to ensure there are no unmarked live systems on the site.

The drainage system and water supply will remain intact.

Dismantling - In line with the waste hierarchy efforts will be made to seek a buyer for all the plant and equipment, forklift trucks etc. Either as a whole or in suitable lots.

Scrapping - If no suitable parties are found to purchase the plant it will be scrapped, again either as a whole or in suitable lots.

After plant has been removed - The whole internal area will be subject to a thorough inspection testing remaining electrical circuits labelling testing.

Deep cleaning the building, floors and removing all residues off-site to a suitably permitted facility.

11.5 Monitoring

Throughout the period of decommissioning the plant and building will be checked at least weekly when dismantling work is not being undertaken and daily when it is. Checks will ensure the integrity of the site surface is being maintained and the risk of spillage or pollution is being kept to a minimum. Contractors will be required to make their own checks and make these available during such checks. Once plant has been removed periodic checking will be carried out giving regard to the risk if any the use of the area may pose.

11.6 Permit Surrender

If the permit is to be surrendered a scheme of sampling and analysis of the soil beneath the site maybe undertaken if during communications with the EA it is deemed required.

If analyses show any contamination to be present which would interfere with the succeeding use of the site this will be removed or treated to bring the round/groundwater into an acceptable condition for the surrender of the permit and completion of the site condition report to the satisfaction of the EA or the relevant regulatory body at that juncture.

12 ENVIRONMENTAL PERMITTING REGULATIONS

The permit application meets all aspects of the EPR by virtue of being part site application and part installation application.

The site is subject to a planning application which will give due consideration to all local and national planning policies in relation to waste disposal and recycling /recovery.

Meeting the requirements of S5.06 Section 4.2

13 HABITATS

There are 4 Euorepean designations within 2 km of the site as shown below.

	DESIGNATED SITES (European)		
1	Area of Outstanding Natural Beauty - Kent Downs	951 m	S
2	Ancient Woodland - Whitehill Wood	1235 m	SE
3	Ancient Woodland - Three Corner Piece	1615 m	E
4	Ancient Woodland - Long/Oakfield Shaws	1590 m	SW

This Appropriate Measures and all other associated documents have been produced to ensure the proposal does not impact on these designations.

Table 4 Assessment Table

Appropriate measures used

- https://www.gov.uk/guidance/non-hazardous-and-inert-waste-appropriate-measures-for-permitted-facilities
- Guidance for the storage and treatment of aerosol canisters and similar packaged wastes, An addendum to Sector Guidance Note IPPC S5.06 (Version 1.0 November 11).

Appropriate Measures Ref	Brief Description	Operating to Appropriate Measure	Comments
2. General management appropriate measures	These are appropriate measures for the environmental management of a regulated facility permitted to store, treat or transfer (or both) non-hazardous and inert waste.		
2.1 Management system	You must have an up-to-date written management system, and activities at your facility must follow it. Your management system must incorporate the following features. You have: • management commitment, including from senior managers • an environmental policy that is approved by senior managers and includes the continuous improvement of the facility's environmental performance, so you can identify pollution risks and minimise them through appropriate measures You implement your environmental performance procedures, paying particular attention to: • staff structure and relevant responsibilities • staff recruitment, training, awareness and competence • communication (for example of performance measures and targets) • employee involvement • documentation • effective process control • maintenance programmes • management of change • emergency preparedness and response • making sure you comply with environmental legislation You check environmental performance and take corrective action, paying particular attention to: • monitoring and measurement • learning from incidents, near misses and mistakes, including those of other organisations • records maintenance • independent (where practicable) internal or external auditing of the management system to confirm it has been properly implemented and maintained • inventory of emissions to air and water • residues management plan • accident management plan	Yes	018.1_05_003 EMS and OT 018.1_05_005 AM

Appropriate Measures Ref	Brief Description	Operating to Appropriate Measure	Comments
	• site infrastructure plan • site condition report for new facilities or where you are increasing the facility's area • odour management plan, if required • noise and vibration management plan, if required • dust, mud and litter management plans, if required • pest management plan, if required • fire prevention plan, unless your facility does not handle combustible waste • climate change risk assessment and adaptation plan		
2.2 Staff Competency	1. Your facility must be operated at all times by an adequate number of staff with appropriate training, qualifications and competence. You must keep records of training, qualifications and relevant experience. 2. If you operate a 24-hour process, you must have: • remote or telemetric systems to make sure an alarm would be raised in the event of an incident during unmanned hours • appropriate personnel on call to deal with these incidents You must explain these procedures in your management system. 3. The design, installation and maintenance of infrastructure, plant and equipment must be carried out by competent people, including Construction Quality Assurance where appropriate. 4. You must have appropriately qualified managers for your waste activity who are members of a government approved technical competence scheme and who attend the facility as set out in our attendance guidance. 5. Staff carrying out waste acceptance checks, including sampling and analysis of waste, must be appropriately trained and competent to: classify and characterise waste properly • identify whether it is suitable for your facility • manage any loads that do not conform to waste acceptance criteria • determine end of waste products	Yes	018.1_05_003 EMS and OT 018.1_05_005 AM
2.3 Accident Management Plan	1. As part of your written management system you must have a plan for dealing with any incidents or accidents that could result in pollution, including near misses.	Yes	018.1_05_003 EMS and OT 018.1_05_005 AM

Appropriate Measures Ref	Brief Description	Operating to Appropriate Measure	Comments
	2. The accident management plan must identify and assess the risks the facility poses to human health and the environment. Particular areas to consider may include: • waste types • transferring substances, for example filling (including overfilling) or emptying of vessels and containers • preventing incompatible substances coming into contact with each other • failure of plant and equipment, for example storage tanks and pipework, or blocked drains • failure of containment, for example bund failure or drainage sumps overfilling • making the wrong connections in drains or other systems • failure to contain firefighting water • failure of abatement systems • hazardous atmospheres in confined spaces • failure of main services, for example power, steam or cooling water • checking the composition of effluents before their emission • vandalism and arson • operator error • accessibility of control equipment in emergency situations • extreme weather conditions, for example flooding or very high winds 3. You must assess the risk of accidents and their possible consequences. You can use our risk assessment guidance to help you to do this. Risk is the combination of the likelihood that a hazard will occur and the severity of the impact resulting from that hazard. Having identified the hazards, you can assess the risks by addressing six questions: • how likely is it that the accident will happen? • what may be emitted and how much? • where will the emission go – what are the pathways and receptors? • what are the consequences? • what is the overall significance of the risk? • what can you do to prevent or reduce the risk? 4. The depth and type of accident risk assessment you carry out will depend on the characteristics of your facility and its location. The main factors to take into account are the: • scale and nature of the accident hazard presented by the facility and its activities • risks to areas of population and the environment (the receptors) 5. Through your accident management plan, you must also identify the roles and responsibilities of the staff involved in managing accidents. You must provide them with		018.1_05_004 FPP

Appropriate Measures Ref	Brief Description	Operating to Appropriate Measure	Comments
	clear guidance on how to manage each accident scenario, for example as a result of a spillage of a potentially polluting liquid. 6. You must have a suitably trained facility employee available at all times who will act as an emergency coordinator and will take lead responsibility for implementing the accident management plan. 7. You must train your employees so they can perform their duties effectively and safely and know how to respond to an emergency. 8. You must also: show how you will communicate with relevant authorities, emergency services and neighbours (as appropriate) before, during and after an accident • implement emergency procedures, including for safe plant shutdown and site evacuation • implement post-accident procedures that include carrying out an assessment of the harm an accident may have caused and the remediation actions you will take • consider the impact of accidents on the function and integrity of plant and equipment • have contingency plans to relocate or remove waste from the facility, and suspend incoming waste • test the accident management plan by carrying out emergency drills and exercises 9. After a flooding event you must inspect and assess the integrity of affected plant and equipment, in particular infrastructure that may have been in contact with floodwater or groundwater. Tank inspections should include non-destructive testing methods to verify their integrity. 10. You must take the following measures, where appropriate, to prevent events that may lead to an accident. You must have appropriate procedures set out in your accident management plan. Preventing accidental emissions 11. You must make sure that you contain the following (where appropriate) and route to the effluent system (where necessary and lawful): • process waters • site drainage waters • emergency firefighting water • chemically contaminated waters • spillages		

Appropriate Measures Ref	Brief Description	Operating to Appropriate Measure	Comments
	12. You must have planned for how you will manage the impacts of tidal surges and storm water flows. You must consider abnormal operating scenarios and incidents, for example, by providing buffer storage capacity. You should take into account the: • nature of the pollutants • potential pathways • effects of downstream waste water treatment • sensitivity of the receiving environment 13. If buffer storage capacity is required, you can only discharge from it after you have assessed the water for contamination, in order to identify an appropriate disposal route. 14. You must implement spill contingency procedures to minimise the risk of an accidental spill entering watercourses or sewers or contaminating land. 15. You must take account of additional firefighting water flows or firefighting foams, as set out in our fire prevention guidance. You may need infrastructure like emergency storage lagoons to prevent contaminated firefighting water from reaching a receiving water body. 16. You must consider and, if appropriate, plan for the possibility that you may need to contain or abate accidental emissions from: • overflows • tank failures • tank wall penetrations • site plant or machinery leaks Security measures You must have security measures (including staff) to prevent unauthorised access to your facility, so preventing: • damage to equipment • theft • illicit dumping and fly-tipping • arson 17. Depending on your risk assessment, facilities must use an appropriate combination of: • security guards • total enclosure (usually with fences) • controlled entry points • lighting • warning signs		

Appropriate Measures Ref	Brief Description	Operating to Appropriate Measure	Comments
	• 24 hour surveillance, such as CCTV Fire prevention 18. If your permit allows you to store or treat combustible waste, you must have a fire prevention plan that meets the requirements of our guidance. Other accident prevention measures 19. You must maintain plant control in an emergency using one or a combination of: • alarms • trips and interlocks • automatic control systems • tank level readings such as ultrasonic gauges, high level warnings, process interlocks and process parameters 20. You must: • make sure that all the measurement and control devices you would need in an emergency are easy to access and operate in an emergency situation • maintain plant in a good state through a preventive maintenance programme and a control and testing programme • use techniques such as suitable barriers to prevent moving vehicles damaging equipment • implement procedures to avoid incidents due to poor communication between operating staff – during shift changes and following maintenance or other engineering work Record keeping and procedures 21. You must: • keep an up to date record of all accidents, incidents, near misses, changes to procedures, abnormal events, and the findings of maintenance inspections • carry out investigations into accidents, incidents, near misses and abnormal events and record the steps taken to prevent their reoccurrence • maintain an inventory of substances which are present (or likely to be) and which could have environmental consequences if they escape 22. You must notify the Environment Agency without delay if you detect any of the following events and they are causing, or may cause, significant pollution: • a malfunction • a breakdown or failure		

Appropriate Measures Ref	Brief Description	Operating to Appropriate Measure	Comments
	• an accident • emission of a substance not controlled by an emissions limit • breach of an emissions limts		
2.4 Contingency plan and procedures	1. You must implement a contingency plan so that you: comply with all of your permit conditions and operating procedures during maintenance or shutdown at your facility, including disruption at other facilities that would affect supplies to your facility or the removal of waste from it • do not exceed limits in your permit and continue to apply appropriate measures for storing and handling waste • stop accepting waste unless you have a clearly defined method of recovery or disposal and enough permitted capacity 2. You must have contingency procedures to make sure that, as far as possible, you know in advance about any planned shutdowns at waste management facilities to which you send waste. 3. You must make your contracted or regular customers are aware of your contingency plan and of the circumstances in which you would stop accepting waste from them. 4. You must consider whether the sites or companies you rely on in your contingency plan: • can take waste at short notice • are authorised to do so in the quantities and types likely to be needed, in addition to carrying out their existing activities 5. If you could exceed your permitted limits, or compromise you storage or handling procedures, you must not discount alternative disposal or recovery options on the basis of extra cost or geographical distance. 6. You must not include unauthorised capacity in your contingency plan. If your contingency plan includes using temporary storage for additional waste at your facility, then you must make sure that your facility is authorised for this storage and you have the appropriate infrastructure in place. Contingency measures for treatment only 7. Your management procedures and contingency plan must: • identify your technology's known or predictable malfunctions and the procedures, spare parts, tools and expertise needed to deal with them – so you can minimise predictable malfunctions and fix them quickly	Yes	018.1_05_003 EMS and OT 018.1_05_005 AM

Appropriate Measures Ref	Brief Description	Operating to Appropriate Measure	Comments
	• include a record of spare parts held, especially critical spares, or state where you can get them from and how long it would take • have a defined procedure to identify, review and prioritise items of plant which need a preventative regime • include all equipment or plant whose failure could directly or indirectly affect the environment or human health – if the equipment or plant is process critical then you may need to stop accepting waste or shut down your process • make sure you have the spare parts, tools, and competent staff needed before you start maintenance 8. If you produce an end-of-waste material, your contingency planning must consider storage capacity for end-of-waste products and materials that fail the end-of-waste specification. 9. Your management system must include procedures for auditing your performance against all of these contingency measures and for reporting the audit results to the site manager.		
2.5 Facility Decommissioning	1. You must consider the decommissioning of the facility at the design stage and make suitable plans to minimise risks during decommissioning. 2. For existing facilities where potential risks are identified, you must implement a programme of design improvements. These design improvements must make sure that you: • avoid using subsurface tanks and pipework • drain and clean out vessels and pipework before dismantling • use insulation which you can remove easily without dust or hazard • use recyclable materials, taking into account operational or other environmental objectives 3. You must maintain a decommissioning plan to demonstrate that: • plant can be decommissioned without causing pollution • the site will be returned to a satisfactory condition 4. You should identify non-productive or redundant items such as tanks, pipework, retaining walls, bunds, reusable waste containers, ducts, filters and security systems and implement a programme of decommissioning and removal. 5. You should follow our guidance on how land and groundwater should be protected at permitted facilities. You should plan for producing a site condition report, if needed to surrender your permit.	Yes	018.1_05_003 EMS and OT 018.1_05_005 AM 018.1_05_006 SCR
3. Waste pre-acceptance, acceptance and tracking These are appropriate measures for waste pre-acceptance, acceptance and tracking at a regulated facility permitted to store, treat or transfer (or both) non-hazardous and inert waste.			

Appropriate Measures Ref	Brief Description	Operating to Appropriate Measure	Comments
3.1 Waste pre-acceptance	1. You must implement waste pre-acceptance procedures so that you know enough about a waste (including its composition) before it arrives at your facility. You need to do this to assess and confirm that the waste is technically and legally suitable for your facility. If you accept the waste, you must keep records to justify your decision. Your pre-acceptance procedures must follow a risk-based approach, considering: • the source and nature of the waste • potential risks to process safety, occupational safety and the environment (for example from odour and other emissions) • knowledge about the previous waste holder(s) 2. Some facilities receive waste on an ad hoc basis. In those instances pre-acceptance checks can still be carried out before the waste is accepted. For example, through the exchange of information at the weighbridge before acceptance on site. 3. When you receive a customer query, and before the waste arrives at your facility, you must get enough information from the waste producer to satisfy yourself that the waste has been properly assessed and classified as set out in WM3. 4. In the case of household and similar non-household waste (including skip waste) waste is pre-accepted by the terms and conditions of the contract in place (for example skip waste companies excluding fridges and freezers or hazardous wastes). There should also be a visual pre-acceptance check before removal from the producer's premises. 5. For commercial and industrial waste you must get the following information in writing or electronic form: • details of the waste producer including their organisation name, address and contact details • a description of the waste • the waste classification code (also referred to as a List of Waste (LoW) or European Waste Classification code • the source of the waste (the producer's business and the specific process that has created the waste) • information on the nature and variability of the waste production process • information about the history of the producer site if it may be relevant to the classification of the waste (for example soils and other construction and demolition arisings from a site contaminated by previous industrial uses) • the waste's physical form • the waste's composition (based on representative samples if necessary)	Yes	018.1_05_003 EMS and OT 018.1_05_005 AM 018.1_05_007 LOW

Appropriate Measures Ref	Brief Description	Operating to Appropriate Measure	Comments
	• a description of the waste's odour and whether it is likely to be odorous • an estimate of the quantity you expect to receive in each load and in a year For mirror entry LoW codes (as defined in WM3), you must keep the evidence that you have made an assessment of the waste to assign the relevant mirror entry code. 6. You do not need to have sample information if the origin of the waste is reliably understood and it clearly shows that the waste is non-hazardous. However, a visual assessment alone will not be enough to assess whether mirror entry waste is hazardous or not. 7. If the waste is a mirror entry and has not been properly assessed, you must assume it is the hazardous entry as a precautionary measure. This is likely to mean that you cannot accept it at your facility. The pre-acceptance information should be verified by contacting or visiting the producer. Dealing with staff directly involved in waste production can help to fully characterise a waste. 8. Analysis of samples must be carried out by laboratories who are UKAS or MCERTs accredited for the prescribed test. 9. After a waste has been properly assessed and classified, you must technically assess the waste's suitability for storage and treatment at your facility to make sure you can meet your permit conditions. You must make sure that the waste complies with your facility's treatment capabilities and you are permitted to take that waste. 10. You must keep pre-acceptance records for at least 3 years, with records preferably held electronically, following receipt of the waste. If an enquiry does not lead to receipt of the waste, you do not need to keep records. 11. You must reassess the information required at pre-acceptance if the: • waste changes • process giving rise to the waste changes • waste received does not to conform to the pre-acceptance information In all cases you must reassess the information required at pre-acceptance on an annual basis. 12. When you agree that you will accept waste from a customer, you should decide and record what parameters you will check at the acceptance stage. The checks could be visual, physical, chemical and odour-based parameters. You must also record the criteria for non-conformance or rejection. The person checking the waste for acceptance can also decide on their own additional parameters		
3.2 Waste acceptance	1. You must implement waste acceptance procedures to check that the characteristics of the waste received matches the information provided to you during waste pre-acceptance. This	Yes	018.1_05_003 EMS and OT

Appropriate Measures Ref	Brief Description	Operating to Appropriate Measure	Comments
	is to confirm the waste is as expected and that you can accept it. If the waste does not conform to the pre-acceptance information, you may still be able to accept the waste, but you must confirm first that your permit allows it and that your facility can handle it appropriately. Otherwise, you must reject the waste. 2. Your procedures should follow a risk-based approach, considering: • the source, nature and age of the waste • potential risks to process safety, occupational safety and the environment (for example, from odour and other emissions) • the potential for self-heating • knowledge about the previous waste holder(s) 3. When deciding whether to accept waste, you must also check that the relevant storage areas and treatment processes in your facility have the physical capacity needed to handle the waste. You must not accept waste if this capacity is not available, or if you would breach your permit by doing so. 4. You must visually check wastes and verify them against pre-acceptance information and transfer documentation before you accept them on site. The extent of the initial visual check is based on the waste type and how it is packaged. 5. You must check and validate all transfer documentation and resolve discrepancies before you accept the waste. If you believe the incoming waste classification or description is incorrect or incomplete, then you must address this with the original waste producer or waste carrier (or both) during waste acceptance. You must record any non-conformance. If you have assessed the waste as acceptable for on-site storage or treatment, you must document this. 6. You must have clear criteria that you use to identify non-conforming wastes and wastes to be rejected. You must also have written procedures for recording, reporting and tracking non-conforming and rejected wastes. These must include: • using quarantine storage • notifying the relevant customer or waste producer • recording a summary of your justification for accepting non-conforming waste in your electronic (or equivalent) system You must take measures to prevent the recurrence of non-conforming and rejected wastes. 7. Where you reject waste which has been classified as hazardous, you must follow the procedure set out in our rejected loads guidance.		018.1_05_005 AM 018.1_05_007 LOW

Appropriate Measures Ref	Brief Description	Operating to Appropriate Measure	Comments
	8. You must weigh each load of waste on arrival to confirm the quantities against the accompanying paperwork, unless alternative reliable and representative systems are available (for example, based upon density and volume). You must record the weight in your electronic or equivalent systems, so you can monitor available capacity at your facility. Records of incoming waste are not required for waste from householders deposited at Household Waste Recycling Facilities. 9. The person carrying out waste acceptance checks must be trained to effectively identify and manage any non-conformances in the loads received, so you comply with your Duty of Care for waste and your permit conditions. 10. Your procedures must make sure that your staff watch waste being unloaded, so you can quarantine the waste if necessary before it is mixed with other material. 11. Offloading and reception areas must have an impermeable surface with self-contained drainage, to prevent any potentially polluting liquid from escaping off site. This requirement does not apply if your facility's permit allows only inert wastes and does not require impermeable surfacing with self-contained drainage.		
3.3 Quarantine	1. Your facility must have a dedicated waste quarantine area or areas which you use to temporarily store waste being rejected, or non-conforming waste whilst it is being assessed. Quarantine areas must have impermeable surface with self-contained drainage if there is a risk of contaminated runoff from the quarantined waste. 2. Where there is a risk of fugitive emissions from quarantined waste you must store it in closed or covered containers or within a building. 3. Quarantine storage must be separate from all other storage and clearly marked as a quarantine area. 4. You should store the waste in quarantine in closed containers or cover it to prevent emissions if appropriate. For example, you should sheet quarantined contaminated soil or store it in a covered skip to prevent rainfall or wind from mobilising pollutants. 5. You must have written procedures for dealing with wastes held in quarantine, including a maximum storage volume. The maximum storage time must take account of the potential for odour generation, pest infestation and storage conditions. If the waste is infested or odorous you must remove it within 24 hours or sooner.	Yes	018.1_05_003 EMS and OT 018.1_05_004 FPP
3.4 Waste tracking	1. You should use an electronic or equivalent system to hold up-to-date information about the available capacity of different parts of your facility, for example reception, quarantine, treatment and storage areas. If you do not have an electronic system you still need to hold	Yes	018.1_05_003 EMS and OT 018.1_05_005 AM

Appropriate Measures Ref	Brief Description	Operating to Appropriate Measure	Comments
	the equivalent level of information. You should use a pre-booking system to make sure that you have enough waste storage and process capacity for the incoming acceptable waste. Your electronic or equivalent system must hold all the information generated during: • pre-acceptance • acceptance • non-conformance or rejection • storage • repackaging • treatment • removal off site This information must be readily accessible. 2. You must create records and update them to reflect deliveries, on-site treatment and despatches. Your tracking system will also operate as a waste inventory and stock control system, including both wastes and end-of-waste materials produced at your facility. It must include this information as a minimum: • the date the waste arrived on site • the original producer's details (or unique identifier) • a unique reference number • waste pre-acceptance and acceptance information • the package type and size • the intended treatment or disposal route • the nature and quantity of wastes held on site • where the waste is physically located on site • where the waste is in the designated recovery or disposal process • identifying the staff who have taken any decisions about accepting or rejecting waste streams and who have decided on recovery or disposal options • details that link waste to relevant transfer notes • details of any non-conformances and rejections, including consignment notes for waste rejected because it is hazardous 3. The electronic (or equivalent) system must be able to report for each of LoW code: • the total quantity of waste present on site at any one time • a breakdown of the waste quantities you are storing pending on-site treatment or awaiting onward transfer		018.1_05_004 FPP

Appropriate Measures Ref	Brief Description	Operating to Appropriate Measure	Comments
	• where a batch of waste is located based on a site plan • the quantity of waste on site compared with the limits in your management system and permit • the length of time the waste has been on site compared with the limits in your management system and permit 4. The electronic (or equivalent) system must also be able to report the total quantity of end-of-waste materials on site at any one time, and where that material is located based on the site plan. 5. You must store back-up copies of records off site. These records must be readily accessible in an emergency. 6. You must keep acceptance records for a minimum of 2 years after you have treated the waste or removed it off site. You may have to keep records for longer if they are required for other purposes, for example hazardous waste consignment notes.		
4. Waste storage	1. You must have waste storage and handling procedures. You must store and handle waste in a way that makes sure you prevent and minimise pollution risks by using appropriate measures. 2. You must store waste in locations that minimise the unnecessary handling of waste. 3. Waste handling must be carried out by competent staff using appropriate equipment. You must use mechanical unloading technologies where it is possible, safe and practicable to do so. 4. Where possible, you should locate storage areas away from watercourses and sensitive perimeters, for example those close to public rights of way, housing or schools. You must store all waste within the security protected area of your facility to prevent unauthorised access and vandalism. 5. You must clearly document in your management system the maximum storage capacity of your facility and its designated storage areas. You must regularly monitor the quantity of stored waste against the allowed maximum capacities, and not exceed them. You must define capacity in terms of, for example: • cubic metres or tonnage • numbers of skips or other containers • maximum tank or vessel capacities 6. You should clearly mark all waste storage areas and provide signs indicating the type of waste stored there.	Yes	018.1_05_003 EMS and OT 018.1_05_004 FPP 018.1_05_005 AM

Appropriate Measures Ref	Brief Description	Operating to Appropriate Measure	Comments
	7. You must not accumulate wastes. You must treat wastes or remove them from the site as soon as possible. You must prioritise the treatment or off-site transfer of waste based on: • its type • its age on arrival • the date of arrival • the duration of storage on site 8. Except for inert waste, you must follow the first-in-first-out principle, unless you need to prioritise more recently received wastes because they pose a higher risk of pollution. 9. You must minimise refuse derived fuel (RDF) and solid recovered fuel (SRF) storage durations. You must implement an auditable bale identification system so that you can remove bales in date order. 10. You must securely wrap bales of RDF and SRF with high-density polyethylene (HDPE) membrane or equivalent. This is to prevent water entering, access by pests and odour release. You should inspect bales regularly and rewrap any that are damaged. If they are wrapped securely, you can store them outside (unless your permit forbids this). If you store bales outside, your fire prevention plan must manage the risks from solar heating during hot weather. 11. You must thoroughly clean storage bays and containers on a regular basis to prevent the build-up of aging waste, which will be a source of odour and attract vermin. 12. All waste containers must be fit for purpose, that is: • in sound condition • not corroded, if metal • have well-fitting lids • suitable for the contents • with caps, valves and bungs in place and secure • within the manufacturer's designed lifespan, particularly for plastic containers 13. You must inspect storage areas, containers and infrastructure regularly to make sure there is no loss of containment. You must deal with any issues immediately. You must keep written records of the inspections. You must clean up and log any spillages of waste.		
4.1 Segregation	1. You should keep different types of waste segregated if contamination would inhibit the recovery of the waste. 2. Where paper, plastic, metal or glass have been collected separately, they must not be mixed with other waste or material. This duty applies where you are required to keep wastes separate and to help with or improve waste recovery	Yes	018.1_05_003 EMS and OT 018.1_05_004 FPP 018.1_05_005 AM

Appropriate Measures Ref	Brief Description	Operating to Appropriate Measure	Comments
5. Waste treatment	1. Waste treatment must have a clear and defined benefit. You must fully understand, monitor and optimise your waste treatment process to make sure that you treat waste effectively and efficiently. The treated output material must meet your expectations and be suitable for its intended disposal or recovery route. You must identify and characterise emissions from the process and take appropriate measures to control them at source. 2. You must prevent unwanted or unsuitable material from entering subsequent waste treatment processes. You must have accurate and up-to-date written details of your treatment activities and the abatement and control equipment you are using. You should include information about the characteristics of the waste to be treated and the waste treatment processes, including: • simplified process flow sheets that show the origin of the emissions • diagrams of the main plant items where they have environmental relevance, for example, storage, tanks, treatment and abatement plant design • details of physical processes for example separation, compaction, shredding, heating, cooling or washing • an equipment inventory, detailing plant type and design parameters • waste types to be subjected to the process • the control system philosophy and how the control system incorporates environmental monitoring information • process flow diagrams (schematics) • the hourly processing capability of waste treatment equipment • a summary of operating and maintenance procedures The extent of the information about your treatment activities will depend on the nature, scale and complexity of your facility and the range of environmental impacts it may have. It is also based on the type and amount of wastes processed. 3. You must have up-to-date written details of the measures you will take during abnormal operating conditions to make sure you continue to comply with permit conditions. Abnormal operating conditions include: • unexpected releases • start-up • momentary stoppages • shutdown		018.1_05_003 EMS and OT 018.1_05_005 AM

Appropriate Measures Ref	Brief Description	Operating to Appropriate Measure	Comments
5.1 Soils and inert waste	Soil and aggregate washing is a physico-chemical treatment (not a separation or sorting activity) and you must categorise the outputs as set out in WM3.	N/A	
5.2 Waste treatment outputs, including fines	1. You must not make assumptions about the nature of the outputs from your waste treatment processes. You must make sure that you appropriately classify the outputs following WM3 If you do not, you may breach your Duty of Care for waste and commit an offence under the Environmental Protection Act 1990. This is particularly important for fines arising from shredding and trommelling processes, which generally: • require disposal at cost • contain a range of contaminants • are likely to be subject to a mirror entry code in the LoW, for example 19 12 11* versus 19 12 12 2. Any hazardous waste taken from your facility must be consigned following our guidance Dispose of hazardous waste. 3. If an output is not waste, for example because end-of-waste criteria have been met, or the material has been produced in accordance with a Quality Protocol (resource framework), then you do not need to store the output within your permitted area. However, non-waste materials are still able to cause pollution, for which you remain liable. You must implement appropriate measures to prevent and minimise risks of pollution from non-waste and waste materials	Yes	018.1_05_003 EMS and OT 018.1_05_004 FPP 018.1_05_005 AM
5.3 Waste treatment for landfill	1. If you are handling or treating waste before you send it to landfill follow our guidance Dispose of waste to landfill.	N/A	
6. Emission control	1. You must identify, characterise and control emissions from your activities that may cause pollution.	Yes	018.1_05_003 EMS and OT 018.1_05_005 AM
6.1 Enclosure within buildings	1. Enclosing activities within buildings can be an appropriate measure for preventing and minimising emissions of pollution, given that an appropriately designed building will reduce a range of types of pollutants, in particular, noise, dust and odour. A partially enclosed building may be an appropriate measure on its own, or together with other appropriate measures, depending on the site-specific circumstances.	Yes	018.1_05_003 EMS and OT 018.1_05_005 AM 018.1_09_004 Site Layout

Appropriate Measures Ref	Brief Description	Operating to Appropriate Measure	Comments
	2. If your waste treatment activities are likely to cause (or are causing) significant pollution at sensitive receptors which cannot be addressed by alternative measures, then you must carry out that waste treatment activity within an enclosed building. 3. You must also carry out non-treatment activities, such as storing and transferring waste (including loading and unloading) in enclosed buildings if these activities are likely to cause (or are causing) significant pollution at sensitive receptors which cannot be addressed by alternative measures. An enclosed building means a construction designed to provide sheltering cover and minimise emissions of noise, particulate matter, odour and litter. It must be enclosed on all sides. Its doorways must be as small as practicable and covered with fast-acting doors which default to the closed position. You must keep its windows closed unless you need to open them for ventilation. Dirty (process contaminated) air must pass through appropriate abatement before being emitted from the building. 4. Material transfer and storage systems and equipment (for example conveyors, hoppers, containers and tanks) can extend outside the enclosed building so long as they are also fully enclosed. 5. You must regularly assess your enclosed building's integrity. You should consider using BS EN ISO 9972:2015 to demonstrate building containment. This method is based on fan pressurisation. You should carry out a smoke test at least annually and where potential faults in building integrity are likely to be causing pollution such as odour. 6. Enclosed buildings must be ventilated to provide a safe working environment for employees. Your building's ventilation system must be properly designed and effective in order for the building to provide adequate containment and prevent fugitive emissions and unacceptable noise. The engineer designing the ventilation system must be appropriately qualified. To validate the size of supply points (louvers), and the volume of dirty air that needs to be extracted, the engineer must understand and consider: • the needs of the occupants working in the building • heat release • the volume of moist gas emissions that will be generated 7. The air inside the enclosed building must be maintained under negative pressure, or you must install a localised extraction system that extracts dirty air from sources of pollution within the building. Sources that could potentially benefit from localised extraction include: • shredders and trommels • waste loading and unloading areas		

Appropriate Measures Ref	Brief Description	Operating to Appropriate Measure	Comments
	• odorous stockpiles 8. You must regularly assess the integrity of your building for damage that could result in fugitive emissions, including noise breakthrough. You must prevent and minimise damage by implementing a maintenance programme. 9. You must implement measures to control door opening, to make sure that the engineered ventilation system works as effectively as possible. It must direct emissions to the abatement system, rather than letting them escape as fugitive emissions through doors or windows. If you use negative pressure, it must be maintained when doors are opened, and you must monitor the pressure to demonstrate its effectiveness. Additional measures to minimise fugitive emissions may be required in some cases, for example installing an airlock entry system. 10. To reduce emissions of noise and vibration, the building must have an appropriate minimum surface density. You must install acoustic seals on doors and windows, following advice from an acoustic specialist.		
6.2 Point source emissions to air (channelled emissions)	1. You must use appropriate measures to make sure that you collect, extract and direct all process emissions to an appropriate abatement system for treatment before release. You must identify the main chemical constituents of your facility's point source emissions as part of your inventory of emissions to air. You must include the speciation of volatile organic compounds (VOCs) if you have identified them in the inventory and it is practicable to do so. You must characterise your emissions sufficiently to make sure that your chosen abatement systems are effective. 2. You must make an assessment of the fate and impact of the substances emitted to air, following the Environment Agency's risk assessment guidance. 3. To reduce point source emissions to air (for example dust and odorous compounds) from the treatment of waste, you must use an appropriate combination of abatement techniques. Or you must demonstrate to us that your alternative abatement is equally effective. The appropriate combination of abatement techniques would include one of more of: • adsorption • biofiltration, biotrickling or bioscrubbing • cyclone • fabric filter • water injection (into a shredder)	See Section 01 of application pack 'EPR_FB3602HU_V002 - Enhanced pre app'.	

Appropriate Measures Ref	Brief Description	Operating to Appropriate Measure	Comments
	4. You must assess and design vent and stack locations and heights to make sure dispersion capability is adequate and noise pollution is prevented. You may need to carry out dispersion modelling to establish whether the height of the vent or stack allows emissions to disperse appropriately, preventing any impacts on receptors. 5. Where monitoring is required, including for odour, you must install suitable monitoring points which meet the sampling standard for the relevant pollutants. 6. You must have procedures to make sure that you correctly operate, monitor and maintain abatement equipment. 7. Your monitoring should demonstrate the effectiveness of the abatement, so that you can take preventative or corrective action as necessary. 8. You should implement contingency measures for abatement system down-time and for any abnormal events, for example biofilter media change. These should include suspending operations until the site is back under control, or having standby abatement available. 9. You should design and operate abatement systems to minimise water vapour plumes.		
6.3 Fugitive emissions to air	1. You must use appropriate measures to prevent and minimise fugitive emissions to air, including dust, mud and litter, odour and noise and vibration. 2. You must use your waste pre-acceptance, waste acceptance and site inspection checks and procedures to identify and manage wastes that could cause, or are causing, fugitive emissions to air. When you identify any such wastes you must: • take appropriate risk-assessed measures to prevent and control emissions • prioritise their treatment or transfer Where necessary to prevent fugitive emissions to air from the storage or handling of wastes, you should use a combination of the following measures: • use fully enclosed material transfer and storage systems and equipment outside buildings, for example conveyors, hoppers, containers, tanks and skips • store and handle the waste within a suitably enclosed area (for example bays), a building or enclosed building • keep doors closed except when access is required • keep enclosed buildings and equipment under adequate negative pressure with an appropriate abated air circulation or extraction system, locating air extraction points close to potential emission sources • use fast-acting or 'airlock' doors that default to closed	Yes	018.1_05_003 EMS and OT 018.1_05_005 AM 018.1_05_002 ERA

Appropriate Measures Ref	Brief Description	Operating to Appropriate Measure	Comments
	3. You must have an appropriate, regular maintenance programme covering all buildings, plant and equipment. It must help prevent emissions or minimise them. Your maintenance programme must include: • a leak detection and repair programme to promptly identify and mitigate any fugitive emissions of organic compounds from treatment plant and associated infrastructure (for example, pipework, conveyors or tanks) • regular inspection and cleaning of all waste storage and treatment areas and equipment (including conveyor belts) to avoid large scale contamination activities • preventing plant and equipment from corroding (for example, conveyors or pipes) – including selecting and using appropriate construction materials, and lining or coating equipment with corrosion inhibitors 4. You should monitor and log weather conditions – temperature, wind speed and direction, and describe any precipitation (for example none, drizzle, heavy rain, snow). You can use this information to identify when dispersion conditions are poor (that is, periods of warm, calm weather with wind blowing towards sensitive receptors). You can also use it to inform decisions to implement additional short-term pollution control contingency measures. If you have a weather station you should position it carefully, for example not placing it in between buildings. There is guidance in the World Meteorological Organization's Guide to Meteorological Instruments and Methods of Observation. 5. Relying on dispersion and wind direction to minimise pollution at sensitive receptors must be a last resort and you must not use it instead of measures that prevent and reduce pollution at source. Other measures for dust, mud and litter 6. If your activities are likely to produce dust and particulates, mud or litter that could cause pollution at sensitive receptors, or if such pollution has been substantiated, you must implement and regularly review a dust, mud and litter management plan. You must do this following our guidance. Your dust, mud and litter management plan must explain how you will prevent and minimise emissions of dust, mud and litter from your facility. 7. Measures such as litter fencing and micro-netting should be located as close as possible to areas where you load and unload light-weight loose waste, if this activity is done outdoors. You should not rely on fences and screens at the perimeter of your facility to stop litter escaping.		

Appropriate Measures Ref	Brief Description	Operating to Appropriate Measure	Comments
	8. Measures such as mist sprays should be located as close as possible to point source emissions of dust, for example at conveyors, trommels, shredders, and at building entrances – except where this would increase odour from biodegradable waste. If measures such as using hoses and road sweepers do not prevent mud escaping onto the public highway, you must take further measures and you must consider installing a high pressure wheel wash. Regardless of the measures you use, you must make sure that you minimise water consumption, and that contaminated water does not escape from your facility, unless you can lawfully discharge it. Other measures for odour 9. If your activities are likely to produce odour pollution at sensitive receptors, or such pollution has been substantiated, you must implement and regularly review an odour management plan following our guidance, which includes H4 Odour management. Your odour management plan must explain how you will prevent and minimise odorous emissions from your facility. 10. You must reject waste that is highly odorous as part of your pre-acceptance and waste acceptance procedures. This is unless you can handle and treat these wastes within an enclosed building with appropriate odour control measures, including extraction via odour abatement. Otherwise, you should talk to the waste supplier to stop it happening again. You should avoid receiving aged waste, for example by refusing to accept waste from other transfer stations that do not have strict inventory controls and documented holding times. 11. You must make sure that odorous waste arrives at and leaves your facility in covered or enclosed vehicles. Mesh covers are not adequate to control odour. You should minimise how long potentially odorous waste is kept at your facility, in particular under anaerobic conditions. Making smaller stockpiles increases natural aeration, reducing the risk of anaerobic biodegradation which can cause odour. 12. You should wash empty vehicles before they leave your facility, to remove any residues which may be or become odorous. You must make sure the run-off from this process is contained and lawfully discharged. 13. You should not allow contaminated liquids to pool for long periods of time, as they can be a source of odour. If you do not have a drainage system inside the building that can collect the leachate or dirty water, then you will need other appropriate measures. You should take action to avoid ponding or pooling. Industrial vacuum cleaners can be used to suck up liquids. You should clean any spillages immediately.		

Appropriate Measures Ref	Brief Description	Operating to Appropriate Measure	Comments
	14. You must cover odorous or potentially odorous waters or liquids or keep them in enclosed tanks or containers. 15. Using masking agents (for example dry nano systems, ozone systems and ionisation systems) is a way of attempting to disguise an odour problem. If you understand and process wastes efficiently then you will not need to use masking agents. We do not consider this technology an appropriate measure. Other measures for noise and vibration 16. If your activities are likely to produce noise or vibration pollution at sensitive receptors, or such pollution has been substantiated, you must implement and regularly review a noise and vibration management plan. Follow our guidance H3 part 2 noise assessment and control. Your noise and vibration management plan must explain how you will prevent and minimise emissions of noise and vibration from your facility. 17. For noise, your noise and vibration management plan must be informed by a noise impact assessment carried out following the methodology of BS 4142:2014+A1:2019 'Methods for rating and assessing industrial and commercial sound'. 18. For vibration, your noise and vibration management plan must be informed by a vibration impact assessment carried out following the methodology of BS 6472-1:2008 'Guide to evaluation of human exposure to vibration in buildings. Vibration sources other than blasting'.		
6.4 Point source emissions to water (including sewer)	1. You must identify the main chemical constituents of your facility's point source emissions to water and sewer as part of your inventory of emissions. 2. You must assess the fate and impact of the substances emitted to water and sewer following the Environment Agency's risk assessment guidance. 3. Discharges to water or sewer must comply with the conditions of an environmental permit and a trade effluent consent. 4. Relevant sources of waste water include: • runoff from all waste storage and handling areas, including loading and unloading areas • process water • condensate collected from treatment process • waste compactor runoff • vehicle washing • washing of containers and vessels • soil washing effluent	Yes	018.1_05_003 EMS and OT 018.1_05_005 AM 018.1_09_009 Drainage Plan 018.1_05_002 ERA

Appropriate Measures Ref	Brief Description	Operating to Appropriate Measure	Comments
	• vehicle oil and fuel leaks • spills and leaks • rainwater from bunds around containers and tanks If you need to treat waste water before discharge or disposal, you must use appropriate treatment techniques. An appropriate combination of treatment techniques, for example, could include silt or solids removal and using an oil separator to manage site drainage. 5. You must segregate uncontaminated water streams (for example clean runoff from roofs) from those that require treatment. 6. You must separate contaminated water streams based on pollutant content and treatment required. For example, you may need to collect and treat separately contaminated surface runoff water and process water.		
6.5 Fugitive emissions to land and water	1. You must use appropriate measures to control potential fugitive emissions and make sure that they do not cause pollution. See the guidance on emissions to water and leaks from containers. 2. You must design appropriate surfacing and containment or drainage facilities for all operational areas, taking into account: • collection capacities • surface thicknesses • strength and reinforcement • falls • materials of construction • permeability • resistance to chemical attack • inspection and maintenance procedures • relevant standards of construction • end use, for example by tracked or wheeled vehicles or vehicle weight 3. Your drainage infrastructure must: • prevent incompatible wastes coming into contact with each other • make sure that fire cannot spread 4. You must store and treat all waste on an impermeable surface with contained drainage that meets CIRIA 736 or an equivalent approved standard. The impermeable surfaces must have sealed construction joints. These requirements do not apply in designated areas where the waste being stored or handled does not pose any significant risk of contaminating	Yes	018.1_05_003 EMS and OT 018.1_05_005 AM 018.1_09_009 Drainage Plan 018.1_05_002 ERA

Appropriate Measures Ref	Brief Description	Operating to Appropriate Measure	Comments
	surface water or ground water. You must appropriately isolate these designated areas from other operational areas so that there cannot be any flows between them. This includes in the event of an accident, for example a fire. 5. You must provide bunds for all tanks containing liquids (whether waste or otherwise) that could be harmful to the environment if spilled. Bunds must meet CIRIA 736 or an equivalent approved standard and: • be impermeable, stable and resistant to the stored materials • have no outlet (that is, no drains or taps) and drain to a blind collection point • have pipework routed within bunded areas with no penetration of contained surfaces • be designed to catch leaks from tanks or fittings • have an appropriate capacity • have regular visual inspections – any contents must be pumped out or otherwise removed under manual control after checking for contamination • be fitted with a high level probe and an alarm (as appropriate) if not frequently inspected • have tanker connection points within the bund (where possible), and if not possible you must provide adequate containment for spillages or leakage • have programmed engineering inspections (extending to water testing if structural integrity is in doubt) • be emptied of rainwater regularly to maintain the containment capacity 6. All above-ground tanks containing liquids (whether waste or otherwise) that could be harmful to the environment if spilled must be kept on an impermeable surface with contained drainage that meets CIRIA 736 or an equivalent approved standard. You must fit the tanks with alarms and cut-out systems to detect and prevent leaks and spills. 7. You must minimise using subsurface equipment and infrastructure, and decommission it where possible. For subsurface structures, you must: • establish and record the routing of all site drains and subsurface pipework • identify all subsurface sumps and storage vessels • engineer systems to minimise leakages from pipes and make sure they can be detected quickly if they do occur • provide secondary containment or leakage detection for subsurface pipework, sumps and storage vessels – vessels must be fitted with alarms and cut-out systems to detect and prevent spills when filling • establish an inspection and maintenance programme for all subsurface structures, for example, pressure tests, leak tests, material thickness checks or CCTV		

Appropriate Measures Ref	Brief Description	Operating to Appropriate Measure	Comments
	8. You must provide secondary containment that meets CIRIA 736, or an equivalent approved standard, for all drums and other mobile containers which: • are greater than 200 litres in capacity and are kept outside • contain liquids (waste or otherwise) that could be harmful to the environment if spilled 9. You must comply with the oil storage regulations. These apply to non-hazardous wastes such as vegetable and cooking oil, as well as to biofuels and mineral oils. 10. You must provide appropriate buffer storage capacity at your facility to store waste waters, taking into account: • potential abnormal operating scenarios and incidents • the nature of any polluting substances and their impact on the downstream waste water treatment plant and receiving environment You must have appropriate measures to monitor, treat and reuse the water held in the buffer storage before discharging. 11. You must take appropriate measures to prevent emissions from washing and cleaning activities, including: containing and directing spray, liquid effluent and wash-waters to foul sewer or collecting them in a sealed system for offsite disposal – you must not discharge them to surface or storm drains • where possible, using biodegradable and noncorrosive washing and cleaning products • storing all detergents, emulsifiers and other cleaning agents in suitable bunded or containment facilities, within a locked storage area, or in a building away from any surface water drains • preparing cleaning or disinfection solutions in contained areas of the site and never in areas that drain to the surface water system or groundwater 12. You must produce and implement a spillage response plan and train staff to follow it and test it. 13. Your procedures and associated training must make sure you deal with spillages immediately. You should follow the manufacturer's health and safety advice for any products or substances involved. 14. You must keep spill kits at locations close to areas where a spillage could occur and make sure relevant staff know how to use them. You must make sure kits are replenished after use.		

Appropriate Measures Ref	Brief Description	Operating to Appropriate Measure	Comments
	15. You must stop spillages from entering drains, channels, gullies, watercourses and unmade ground. You must make available proprietary sorbent materials, sand, booms or drain mats for use when required. 16. You must make sure your spillage response plan includes information about how to recover, handle and correctly dispose of waste produced from a spillage. 17. You must have a documented inspection and maintenance programme for impermeable surfaces and containment facilities and keep records to demonstrate its implementation.		
6.6 Pests	1. You must manage waste in a way that prevents pests. For example, if you do not manage flies, rats and birds they can affect operations, be a nuisance to neighbours and pose an environmental and health hazard as a potential vector for pathogens. We have produced internal guidance for our officers on fly management. Contact us if you would like a copy. 2. If you expect pests will cause pollution, hazard or annoyance at sensitive receptors, or if this has been substantiated, you must create, use and regularly review a pest management plan, following our guidance. 3. Your pest management plan must include procedures for: • inspecting for and controlling pests • rejecting loads of infested waste • treating pest infestations promptly, and removing waste if necessary • storing, handling and using approved pest control products – you can get information on using chemicals at work from the Health and Safety Executive	Yes	018.1_05_003 EMS and OT 018.1_05_005 AM 018.1_05_002 ERA
7. Emissions monitoring and limits	These are emissions limits and appropriate measures for monitoring emissions to air and water for a regulated facility permitted to store, treat or transfer (or both) non-hazardous and inert waste. We may set emission limits and monitoring requirements in your permit, based upon your treatment process, emissions inventory and environmental risk assessment. An emissions inventory means a complete and detailed list of all waste waters and waste gases that you handle or produce at your facility. If your environmental permit requires you to monitor emissions, you must do so following our monitoring guidance. You may need monitoring infrastructure to meet the relevant standards.		
7.1 Emissions to air	1. Your facility's emissions inventory must include information about the relevant characteristics of point source emissions to air, such as the: • average values and variability of flow and temperature • average and peak concentration and load values of relevant substances and their variability • presence of other substances that may affect the waste gas treatment system or plant safety, for example, oxygen, nitrogen, water vapour and dust	N/A	

Appropriate Measures Ref	Brief Description	Operating to Appropriate Measure	Comments
	Guidance on monitoring stack emissions is available. 2. You must monitor fugitive emissions of dust and particulates if they are likely to cause pollution at sensitive receptors, or if this has been substantiated. There is guidance on developing monitoring strategies for assessing levels of pollutants in the ambient atmosphere and monitoring particulate matter in ambient air around waste facilities. 3. You must describe your monitoring programme in your dust management plan. Visual monitoring is not effective for assessing the risk of emissions of fine particulates, for example PM10. You should use dust and particulate monitors with trigger alarms instead. You should set alarm trigger levels to alert site staff when short-term particulate concentrations are elevated, so that you can review site practices or increase your mitigation measures. When combined with weather data, dust and particulate monitors can also provide evidence to demonstrate that your facility is not the cause of complaints. You should use a particulate limit of 75 µg/m3 to100 µg/m3 (over a 5 minute average) for PM10 as an initial trigger for action, and reduce this after the system has been in place for some time.		
7.2 Medium combustion plant directive	1. If you operate medium combustion plant or specified generators you must monitor your emissions following the Environment Agency guidance on Monitoring stack emissions: low risk MCPs and specified generators and maintain a record of the type and quantity of fuel used in the plant. 2. If you have a generator that uses natural gas, for example in a boiler, you must comply with the specified generator regulations. 3. You must keep periods of start-up and shut-down for medium combustion plant and specified generators to a minimum. You must notify the Environment Agency of newly installed combustion units before start-up. 4. You must notify the Environment Agency at least 14 days in advance of any planned changes to the medium combustion plant or generator which could affect compliance with any emission limits that apply, this includes notifying us of any significant upgrades.	N/A	
7.3 Emissions to water and sewer	1. Your facility's emissions inventory must include information about the relevant characteristics of point source emissions to water or sewer, such as: • average values and variability of flow, pH and conductivity • average concentration and load values of relevant substances and their variability, for example, chemical oxygen demand (COD) and total organic carbon (TOC), metals, priority substances or micropollutants	N/A	

Appropriate Measures Ref	Brief Description	Operating to Appropriate Measure	Comments
	• data on bio-eliminability, for example, biochemical oxygen demand (BOD), BOD to COD ratio, biological inhibition potential (for example, inhibition of activated sludge) 2. For relevant emissions to water or sewer identified by the emissions inventory, you must monitor key process parameters (for example, waste water flow, pH, temperature, conductivity or BOD) at appropriate locations. For example, these could either be at the: • inlet or outlet (or both) of the pre-treatment • inlet to the final treatment • point where the emission leaves the facility boundary		
8. Process efficiency appropriate measures	These are process efficiency appropriate measures for a regulated facility permitted to store, treat or transfer (or both) non-hazardous and inert waste. 1. For your installations facility, you must monitor and review the annual quantity of: • water, energy and raw materials used • residues and waste water produced You must do this at least once every yea	Will record in first year of operations to create bench mark.	018.1_05_003 EMS and OT 018.1_05_005 AM
8.1 Energy efficiency (installations only)	1. You must create and implement an energy efficiency plan at your facility. This must: • define and calculate the specific energy consumption of the activity (or activities) you carry out and waste stream(s) you treat • set annual key performance indicators, for example specific energy consumption (expressed in kWh/tonne of waste processed) • plan periodic improvement targets and related actions 2. You must regularly review and update your energy efficiency plan as part of your facility's management system. 3. You must have and maintain an energy balance record for your facility. This must provide a breakdown of your energy consumption and generation (including any energy or heat exported) by the type of source (electricity, gas, conventional liquid fuels, conventional solid fuels, and waste). You should provide Sankey diagrams or energy balances to show how energy is used in your waste treatment processes. 4. You must regularly review and update your energy balance record as part of your facility's management system, alongside the energy efficiency plan. 5. You must have operating, maintenance and housekeeping measures in relevant areas, for example: • air conditioning, process refrigeration and cooling systems (leaks, seals, temperature control, evaporator or condenser maintenance)	Will record in first year of operations to create bench mark.	018.1_05_003 EMS and OT 018.1_05_005 AM

Appropriate Measures Ref	Brief Description	Operating to Appropriate Measure	Comments
	• the operation of motors and drives • compressed gas systems (leaks, procedures for use) steam distribution systems (leaks, traps, insulation) • space heating and hot water systems • lubrication to avoid high friction losses • boiler operation and maintenance, for example, optimising excess air • other maintenance relevant to the activities within the facility 6. You must have measures in place to avoid gross energy inefficiencies. These should include for example: • insulation • containment methods (such as seals and self-closing doors) • avoiding unnecessary discharge of heated water or air (for example, by fitting simple control systems such as timers and sensors) 7. You should implement additional energy efficiency measures at the facility as appropriate, following our guidance.		
8.2 Raw materials (installations only)	1. You must maintain a list of the raw materials used at your facility and their properties. This includes auxiliary materials and other substances that could have an environmental impact. 2. You must regularly review the availability of alternative raw materials and use any suitable ones that are less hazardous or polluting. This should include, where possible, substituting raw materials with waste or waste-derived products. 3. You must justify the continued use of any substance for which there is a less hazardous alternative. 4. You must have quality assurance procedures to control the content of raw materials.	Will record in first year of operations to create bench mark.	018.1_05_003 EMS and OT 018.1_05_005 AM
8.3 Water use (installations only)	1. You must take measures to make sure you optimise water consumption to: • reduce the volume of waste water generated • prevent or, where that is not practicable, reduce emissions to soil and water 2. Measures you must take include: • implementing a water saving plan (involving establishing water efficiency objectives, flow diagrams and water mass balances) • optimising the use of washing water (for example, dry cleaning instead of hosing down, using trigger control on all washing equipment) • recirculating and reusing water streams within the plant or facility, if necessary after treatment	Will record in first year of operations to create bench mark.	018.1_05_003 EMS and OT 018.1_05_005 AM

Appropriate Measures Ref	Brief Description	Operating to Appropriate Measure	Comments
	• reducing the use of water for vacuum generation (for example, using liquid ring pumps with high boiling point liquids) where relevant 3. You must carry out a regular review of water use (a water efficiency audit) at least every 4 years. 4. You must also: • produce flow diagrams and water mass balances for your activities • establish water efficiency objectives and identify constraints on reducing water use beyond a certain level (usually this will be site specific) • identify the opportunities for maximising the reuse, and minimising the use of water • have a timetabled improvement plan for implementing additional water reduction measures 5. To reduce emissions to water, you should apply these general principles in sequence: • use water efficient techniques at source where possible • reuse water within the process by treating it first if necessary – if this is not practicable, use it in another part of the process or facility that has a lower water quality requirement • if you cannot use uncontaminated roof and surface water in the process, you should keep it separate from other discharge streams – at least until after you have treated the contaminated streams in an effluent treatment system and have carried out final monitoring 6. You should establish the water quality requirements associated with each activity and identify whether you can substitute water from recycled sources. Where you can, include it in your improvement plan. 7. Where there is scope for reuse (possibly after some form of treatment) you should keep less contaminated water streams, such as cooling waters, separate from more contaminated streams. 8. You must minimise the volume of water you use for cleaning and washing down by: • vacuuming, scraping or mopping in preference to hosing down • reusing wash water (or recycled water) where practicable • using trigger controls on all hoses, hand lances and washing equipment 9. You must directly measure fresh water consumption and record it regularly at every significant usage point, ideally every day.		
9. Waste minimisation, recovery and disposal	These are waste minimisation, recovery and disposal appropriate measures for a regulated facility permitted to store, treat or transfer (or both) non-hazardous and inert waste. 1. You must have and implement a residues management plan that:	Will record in first year of operations to create bench mark.	018.1_05_003 EMS and OT 018.1_05_005 AM

Appropriate Measures Ref	Brief Description	Operating to Appropriate Measure	Comments
	• minimises the generation of residues, that is solid waste arising from the treatment of waste • optimises the reuse, regeneration, recycling or energy recovery of residues, including packaging • makes sure you properly dispose of residues where recovery is technically or economically impractical 2. Where you must dispose of waste, you must carry out a detailed assessment identifying the best environmental options for waste disposal. You must review on a regular basis options for recovering and disposing of waste produced at the facility. You must do this as part of your management system to make sure that you are still using the best environmental options and promoting the recovery of waste where technically and economically viable.		
Guidance for the storage and treatment of aerosol canisters and similar packaged wastes			
1..2 Wastes covered	For the purpose of this guidance, when manufactured, a canister is:• any pressurised container, typically having an internal pressure between 4 and 10 bar and containing two components: • a product concentrate (e.g. paint, deodorant, lubricant) and • a compressed or liquefied gas propellant; and • any other pressurised canisters of similar construction • similar empty or nominally empty containers that have not been made safe e.g. by piercing to ensure no pressurised gas remains • other similar small containers containing flammable gas that may pressurise when heated (e.g. lighter refills)	Yes	018.1_05_007 LOW 018.1_05_003 EMS and OT 018.1_05_005 AM
1.3 Suitability of wastes for on-site storage and treatment	Canisters, such as those classified under the waste codes given above, may be accepted at waste facilities for storage for treatment or transfer. However, the specific waste canisters a site can accept will depend upon the potential hazards of the waste, the storage and treatment measures provided at the facility and, where applicable, will be defined by the conditions of the environmental permit held by the facility.	Yes	018.1_05_003 EMS and OT 018.1_05_004 FPP 018.1_05_005 AM 018.1_05_007 LOW
3 Waste pre-acceptance and acceptance			

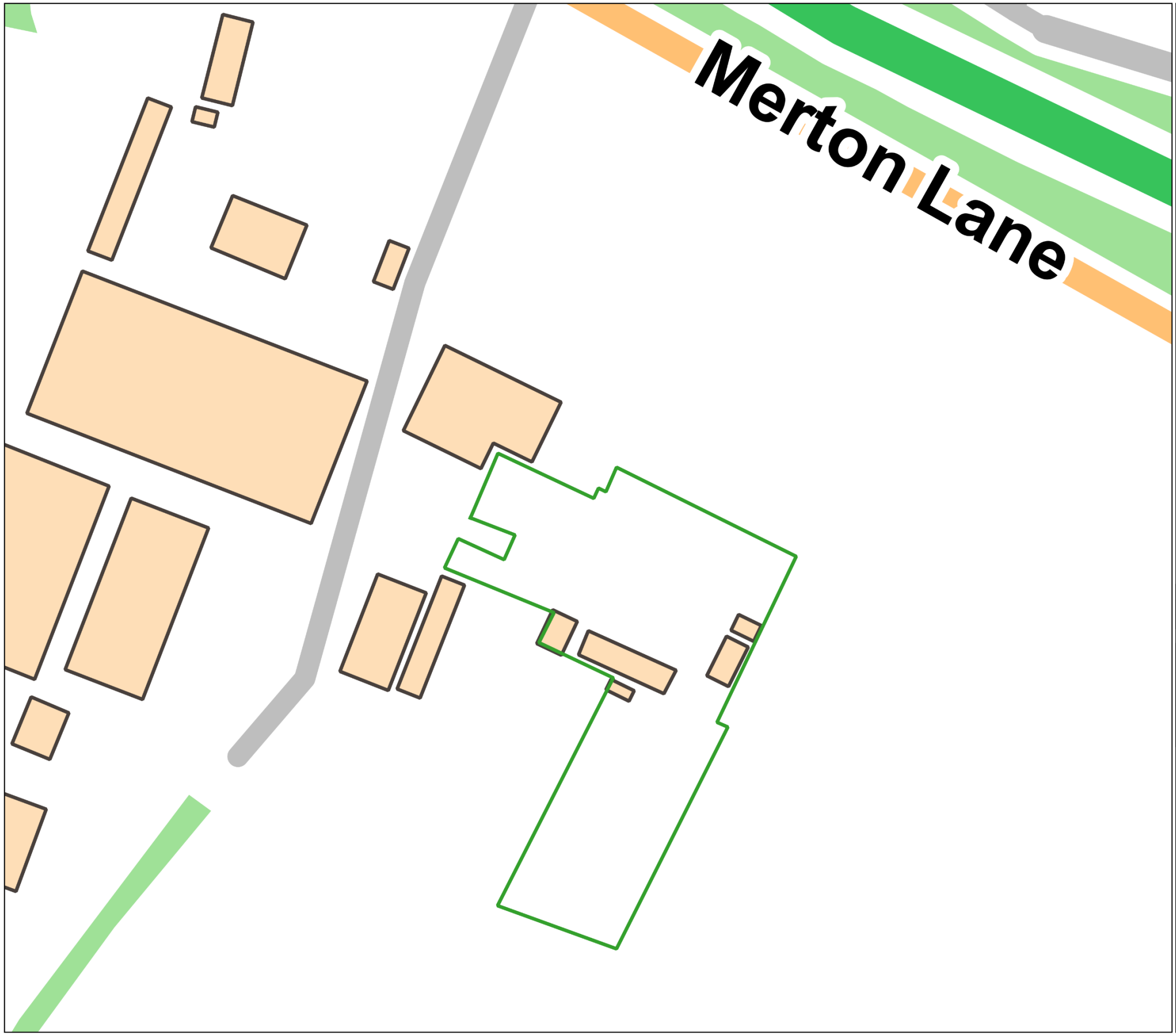
Appropriate Measures Ref	Brief Description	Operating to Appropriate Measure	Comments
3.1 Appropriate measures for waste pre-acceptance	Written procedures should be in place for ensuring that adequate information (including samples where necessary) is obtained from waste producers to allow the Operator to determine the suitability of a waste for onsite storage and treatment before arrangements are made for its acceptance.	Yes	018.1_05_003 EMS and OT 018.1_05_005 AM 018.1_05_007 LOW
3.2 Appropriate measures for waste acceptance	The Operator should have clear and unambiguous criteria for the acceptance and rejection of waste, along with written procedures for the reception, inspection, acceptance, non-conformance, and rejection of waste received at the facility. Procedures for the non-conformance and rejection of waste canisters should be in accordance with indicative BAT requirement 34 of Section 2.1.2 of SGN 5.06 and should take into account the requirements of CDR for the carriage of waste dangerous goods.	Yes	018.1_05_003 EMS and OT 018.1_05_005 AM 018.1_05_007 LOW
4 Appropriate measures for waste storage & handling	Aerosol Storage SGN 5.06 Most aerosols contain materials which are a low hazard to the environment, indeed most are intended to release their contents just about anywhere. The risks if any, come mainly from fire which spreads to involve other materials. Aerosol cans are thin and will rust through quickly in the open air. If a fire starts in a stack of boxes it can be expected to spread quickly, with canisters ejected as they overheat. Some distribution sites place them in cages to prevent 'missiles'. Indoor storage should be employed, to restrict the rate of rusting, and missile risk. An assessment should be undertaken to ensure that land around the store contains nothing that would be expected to be ignited by the contents of an ejected burning can, and to prevent fire spread by radiant heat on an adjacent stack if containment is compromised. BAT Point 27 Storage of aerosols should take place under cover in closed containers or cages. Aerosols should not be stored in open containers.	Yes	018.1_05_003 EMS and OT 018.1_05_004 FPP 018.1_05_005 AM
4.1 Appropriate measures for storage	Storage of containers.	Yes	018.1_05_003 EMS and OT 018.1_05_004 FPP 018.1_05_005 AM
5 Design and operation of waste treatment processes	Key requirements of the IPPC Directive: • the necessary measures are taken to prevent accidents and limit their consequences; • all the appropriate preventive measures are taken against pollution, in particular through application of the best available techniques	Yes	018.1_05_003 EMS and OT 018.1_05_005 AM

Appropriate Measures Ref	Brief Description	Operating to Appropriate Measure	Comments
	• where waste is produced, it is recovered or, where that is technically and economically impossible, it is disposed of while avoiding or reducing any impact on the environment		
5.2 Appropriate measures for the design and operation of the treatment process	Process design and infrastructure Should be fit for purpose and safe with the correct infrastructure.	Yes	018.1_05_003 EMS and OT 018.1_05_005 AM
6 Appropriate measures for emissions control			
6.1 Point source emissions to air	The content of the treated canisters (gases and liquids) should be collected by the treatment process, stored and sent for recovery where appropriate (e.g. used as a secondary fuel). Therefore facilities should be designed and operated so as to have minimal emissions to air and water. Where it is not possible to collect and recover all components of the canisters and an emission can not be prevented, appropriate abatement should be used to ensure that the environmental impact of the emission is minimised.	N/A	
6.2 Point source emissions to water	The Operator should have appropriate measures in place for the collection and discharge of uncontaminated water, including measures to protect it from potential sources of contamination and to prevent its discharge from the site should it be contaminated (i.e. provision of inspection/sampling procedures and infrastructure such as oil interceptors and pen-stock valves prior to discharge). Unless it can be re-used on site, drainage water from the site should be directed to sewer (under the requirements of a discharge consent obtained from the relevant sewage undertaker) or sent to an appropriate waste facility for treatment prior to discharge. In order to minimise potential emissions to water, the Operator should undertake measures to minimise water	Yes	018.1_05_003 EMS and OT 018.1_05_004 FPP 018.1_05_005 AM 018.1_09_009 Drainage
6.3 Fugitive emissions to air and odour	Likely sources of fugitive emissions include open containers (IBCs, drums etc), storage areas, leaking canisters, pipework and associated connections, seals on enclosed equipment, spillages, washing activities, open conveyors and plant failures. Fugitive emissions to air may be odorous, therefore preventing fugitive releases, by following the requirements in Section 2.2.4 and 2.2.6 of SGN 5.06 and those detailed below, can also help to prevent odour issues.	Yes	018.1_05_003 EMS and OT 018.1_05_005 AM 018.1_05_002 ERA
6.4 Fugitive emissions to water, sewer, groundwater	Likely sources of fugitive emissions to water, sewer and groundwater (ground) include incidents such as spills and loss of containment, such as cracked bunds/kerbs and hardstanding, split containers and failure of underground structures. The Operator should take all appropriate	Yes	018.1_05_003 EMS and OT 018.1_05_005 AM 018.1_05_002 ERA

Appropriate Measures Ref	Brief Description	Operating to Appropriate Measure	Comments
	measures, as detailed below, to prevent potential fugitive emissions to ground, from the design and construction of the facility to its operation, inspection and maintenance.		
7 Appropriate measures for process efficiency	The Operator should ensure that the facility is designed and operated in a way that maximises process efficiency, in terms of raw materials and energy, in order to minimise its indirect environmental impact and promote the sustainable use of resources (e.g. in terms of its carbon footprint and use of virgin raw materials), whilst maintaining safe and effective standards of operation.	Yes	018.1_05_003 EMS and OT 018.1_05_005 AM
8 Appropriate measures for accident management	The prevention and management of accidents should be a fundamental consideration in the Operator's Environmental Management System and during the design and operation of the waste facility. In general terms, it will involve: • the identification of potential accident hazards posed by the activities carried out at the facility • assessment of the risk of the identified hazards, in terms of likelihood and consequence • implementation of measures to reduce the risk of the identified accident hazards and contingency plans for any accident should it occur.	Yes	018.1_05_003 EMS and OT 018.1_05_005 AM

14 DRAWINGS

Drawing 1 Permit Boundary 018.1_09_001



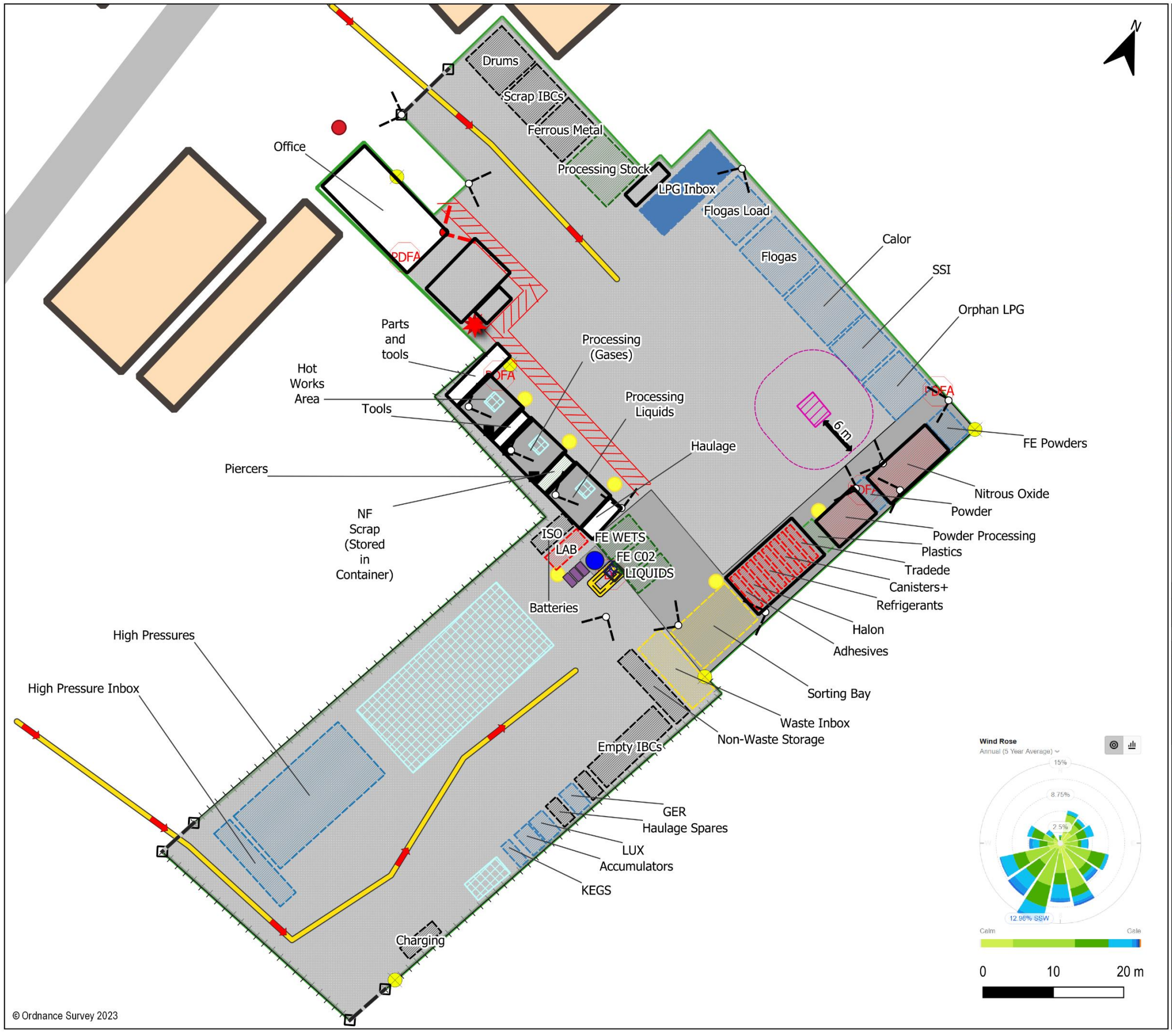
Key:
Permit Boundary

Drawing Title: Permit Boundary
Ref: 018.1_09_001
Scale: 1:12093 (A3)
Date: 2023-11-17
Revison: REV A
Drawn By: AIL
Address: Merton Farm, Merton Lane South, Canterbury, Kent, CT4 7BA
Changelog: - N/A

synergy specialist recycling

UMBRELLA ENVIRONMENTAL
PROTECTING YOUR BUSINESS

Drawing 2 Site Plan 018.1_09_004



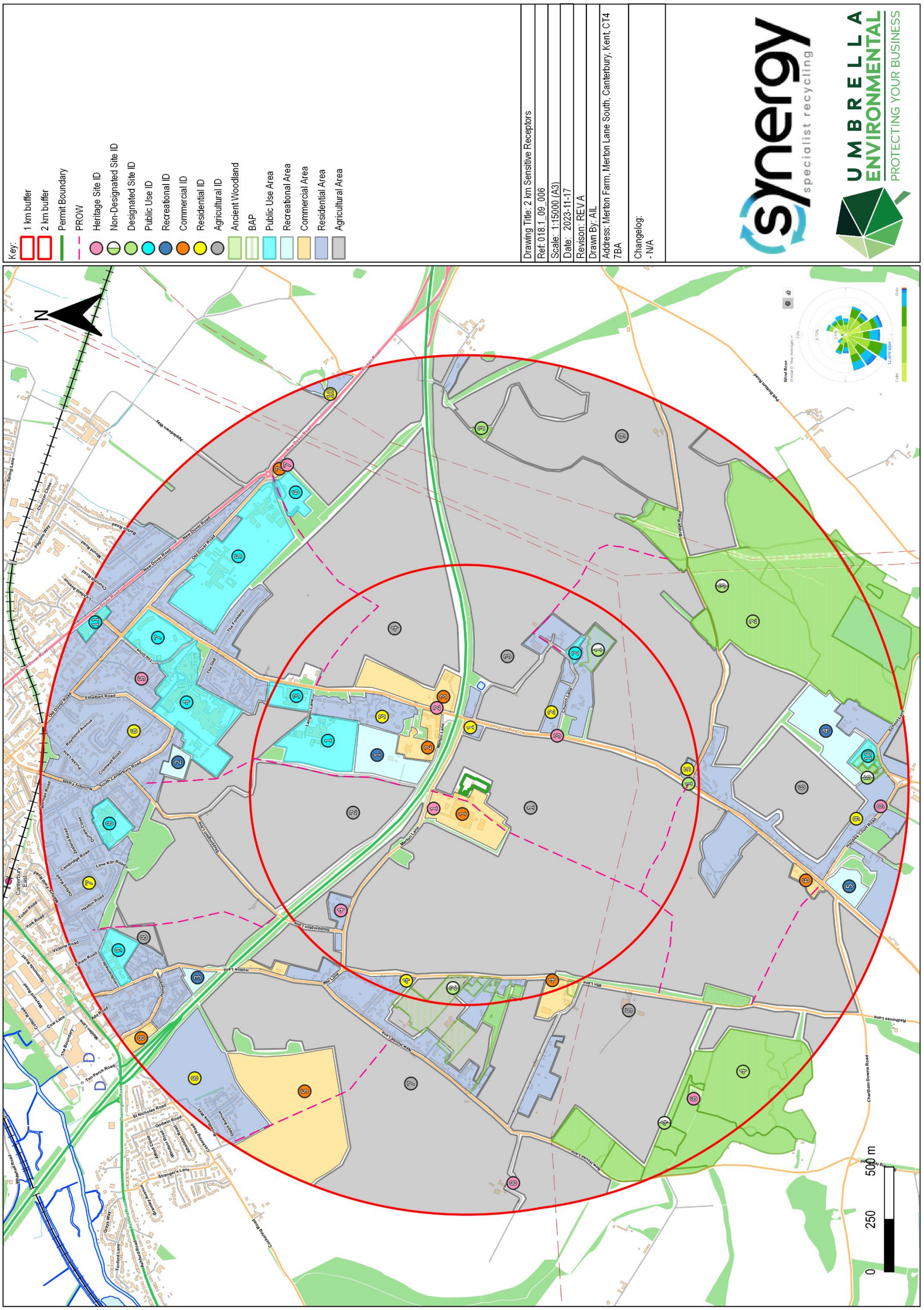
Key:
- Permit Boundary
- Building
- CCTV
- Fixed Plant
- Smoking Point
- Assembly Point
- Fuel Storage
- Spill Kits
- FRS On site access
- Hardstanding
- Impermeable Site Surface
- Palisade fence
- Armco
- Borehole
- Electrical Junction
- Gate
- Lighting
- Palisade fence
- Pedestrian Walkway
- Quarantine Bay
- Quarantine Bunds

Drawing Title: Site Plan
Ref: 018.1_09_001
Scale: 1:500 (A3)
Date: 2024-01-25
Revison: REV A
Drawn By: AIL
Address: Merton Farm, Merton Lane South, Canterbury, Kent, CT4 7BA
Changelog: - N/A

synergy specialist recycling

UMBRELLA ENVIRONMENTAL PROTECTING YOUR BUSINESS

Drawing 3 2 km Sensitive Receptors 018.1_09_006



Drawing 4 10 km Sensitive Receptors 018.1_09_007

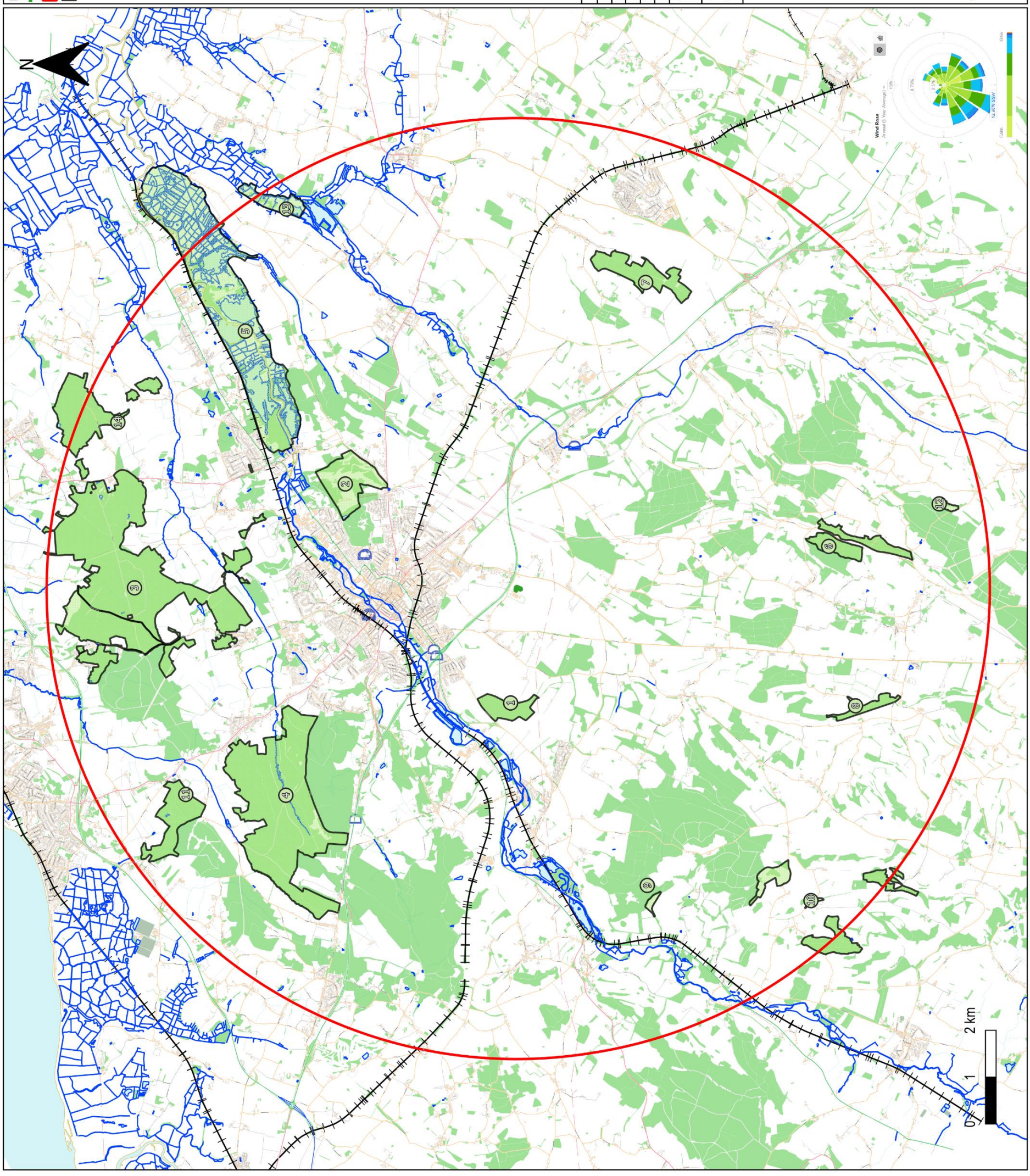
Key:
Permit Boundary
10 km Buffer
Designated Site Area
Designated Site ID

Drawing Title: 10 km Sensitive Receptors
Ref: 018.1_09_007
Scale: 1:15000 (A3)
Date: 2023-11-20
Revison: REV A
Drawn By: AIL
Address: Merton Farm, Merton Lane South, Canterbury, Kent, CT4 7BA

Changelog:
- N/A

synergy specialist recycling

UMBRELLA ENVIRONMENTAL
PROTECTING YOUR BUSINESS



Drawing 5 Drainage Plan 018.1_09_009

Key:
- Permit Boundary
- Engineered High Point
- Surface Water Flow
- Surface Water Drain
- Sump
- Surface Water Drainage
- Hardstanding
- Impermeable Site Surface
- Palisade fence

Drawing Title: Drainage
Ref: 018.1_09_009
Scale: 1:500(A3)
Date: 2024-01-25
Revison: REV A
Drawn By: AIL
Address: Merton Farm, Merton Lane South, Canterbury, Kent, CT4 7BA

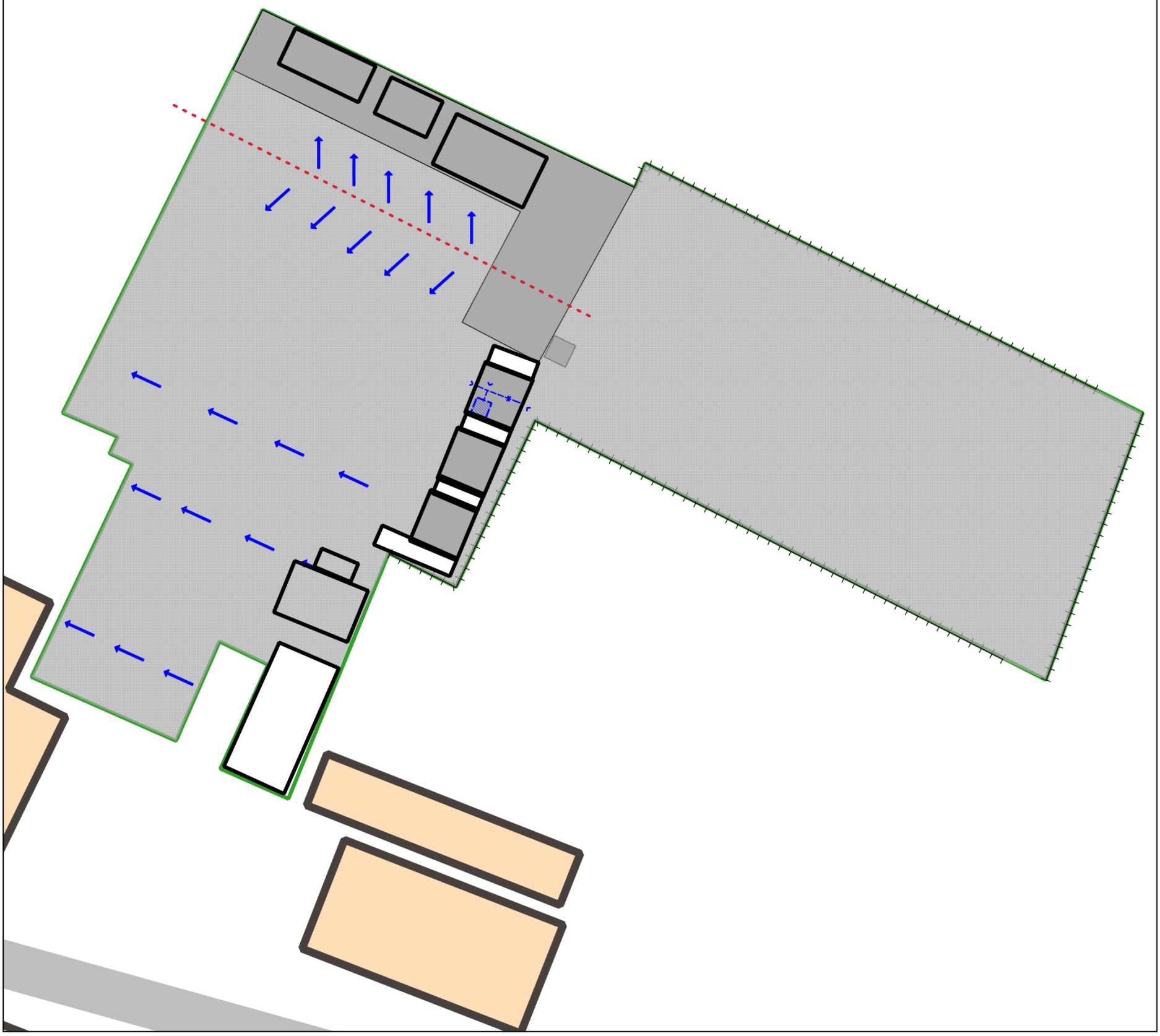
Changelog:
- N/A

synergy specialist recycling

UMBRELLA ENVIRONMENTAL PROTECTING YOUR BUSINESS

N

0 10 20 m



Drawing 6 FIRE ALARM - RCC AREAS

Rev	Ch-ID	Description	Date
P0			27/11/23

General Notes
1. Do not scale off this drawing. Refer to figured dimensions only.
2. This drawing is provided solely for the purpose of illustrating the layout of fire alarm systems. Any view of the building shown on this drawing is indicative only, and may differ from the building's actual construction.

ORANGE LINE REPRESENTS RCC BOUNDARIES

ALLSAVED
BETTER TOGETHER

Client
SYNERGY RECYCLING

Site
MERTON FARM, MERTON LANE, SOUTH CANTERBURY, KENT, CT4 7BA

Drawing Title
FIRE ALARM - RCC AREAS

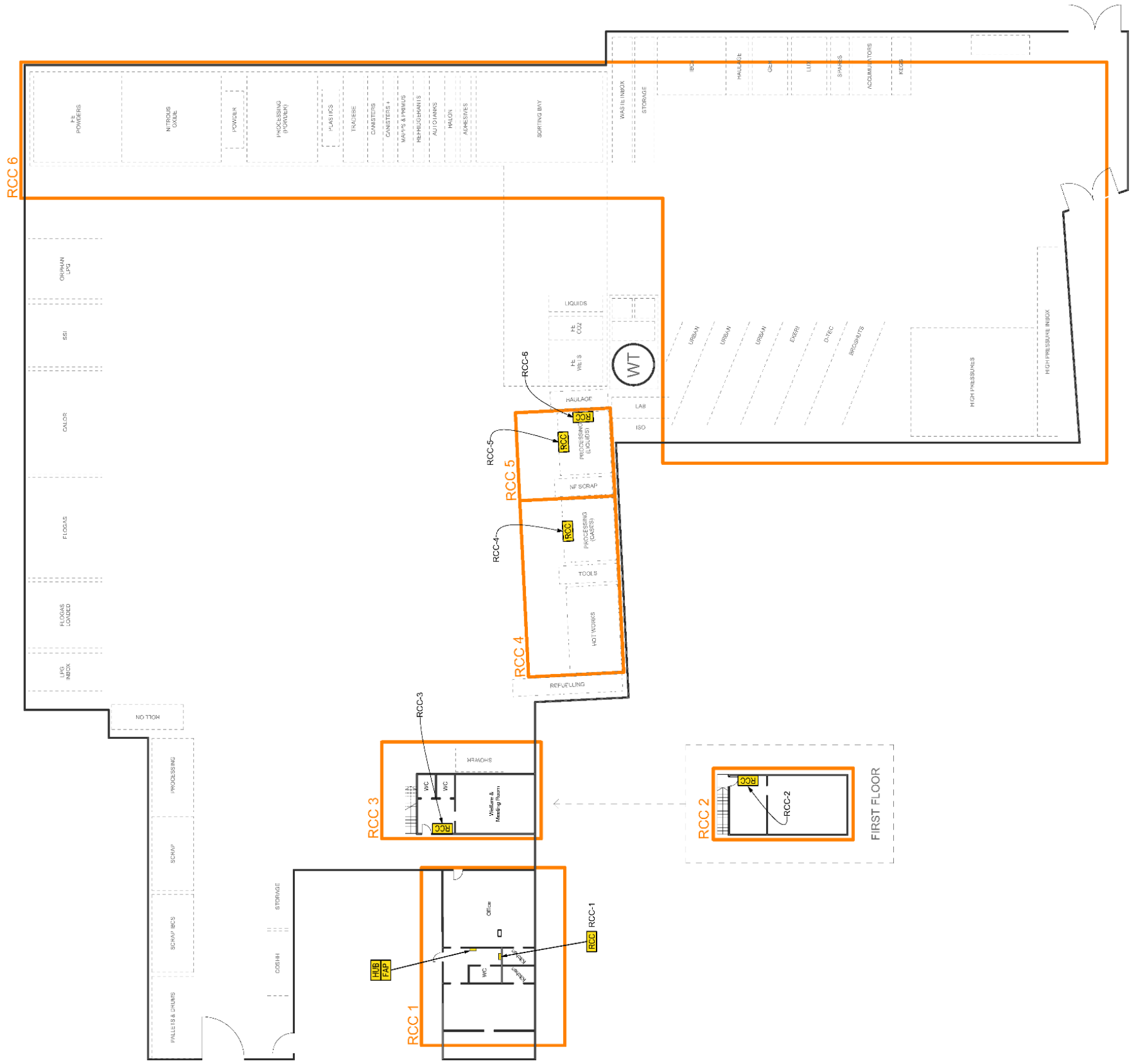
Scale	Checked by
1:180@A1	CC

Drawing Status	Date
FOR CONSTRUCTION	27/11/23

Drawing Number	Revision
ALS-124-01-100	P0

Allsaved Head Office
Unit 3, Billingshurst Trade Park, Stane Street
Billingshurst, West Sussex, RH14 9HP

www.allsaveduk.com 01798 812999



LEGEND		
SYMBOL	DESCRIPTION	Qty
FAP	FIRE ALARM PANEL	1
RCC	RADIO CLUSTER COMMUNICATOR	6
HUB	RADIO HUB CONTROL PANEL	1

15 APPENDICES

Appendix 1 Site Diary

Synergy Recycling Site Diary

Date	Day	Weather	Wind Dir	Wind Spd

Daily site inspections			
Condition of parameter fencing		Condition of plant machinery	
litter not outside of parameter fencing		Waste inspection carried out	
Site free from windblown litter and debris		Safety and fire equipment available	
Condition of site surfaces		Condition of site lighting	
Condition of bunded storage area		Site free from pests & vermin	
Condition of drainage system		Odour emissions at acceptable level	
Drainage system free from blockages		Waste storage area not exceeding maximum capacity	
Site clean from spills		Plant defect sheets complete	
Waste in designated storage areas		No free-flowing liquids entering drains or watercourses	
No Unauthorised waste on site		Accident report book available	
Condition of waste storage containers		First aid equipment available	
Notes/Details of any non-compliance, site defects or waste activities			

I acknowledge that I am entering a site that contains pressurised gas cylinders and I am entering at my own risk. I am in possession of the following Personal Protection Equipment which will be worn whilst on site. High visibility clothing, Protective footwear, Hard hat and Gloves

A Banksman system is in operation on this site. You should not drive a vehicle on to the property until instructed by our Banksman, and you should obey all directions given by them.

If you observe a fire, you should notify a member of staff and evacuate the premises immediately. The evacuation point is by the main entrance to the farm.

Synergy Recycling considers safety to be of the highest priority and operates a system of notification of unsafe practices. If you see anything you consider to be unsafe, please advise a member of staff immediately and provide details below. This form can also be used to advise us of any suggestions you may have on ways we can improve our working practices. For safety reasons, please notify the office upon leaving the premises.

Name	Company	Time in	Time out	Reasons for visit	Signed

Site Diary Completed By	Position	Signed

Appendix 2 Spill Procedure

Spillage Procedure

In the event of a spillage of fuel/oil from site machinery or vehicles, the following procedures will be implemented:

- Clear the area straight away.
- Lay absorbent granules over the spill to soak up the spillage.
- Use Personal Protective Equipment (PPE) provided on site if required.
- Once the liquid has all been absorbed use a shovel to clear up the waste, put it in a plastic sack and then place it in the container for non-compliant waste for disposal at a suitably permitted facility; and
- A record of the spill incident and remedial action taken will be recorded in the Site Diary.

Spillage kits are maintained on site in order to respond to any spillage incident. The spillage kits are kept securely in a designated area as highlighted on the site map.

Appendix 3 House Keeping Checklist

Site:			**Date**	
Floors & Walkways	**Yes**	**No**	**N/A**	**Observations**
Are all walkways kept clear?				
Is the floor free from tripping hazards?				
Are all cables and hoses suitably stored?				
Are all awkward items being stored safely so as not to cause a hazard to pedestrians or vehicles?				
Is all uneven flooring clearly identified?				
Is there a program in place for replacing uneven flooring?				
Are unsafe areas cordoned of?				
Spillages-liquids				
Are wet surfaces covered with non slip materials?				
If necessary are non slip safety shoes provided?				
Are floors cleaned regularly?				
Storage of waste				
Are there suitable skips/containers to handle the different waste products produced on the site?				
Are they regularly emptied?				
Are they able to receive waste now?				
Storage-general				
Are materials and equipment stored in such a way that sharp objects don't interfere with walkways?				
Are tools and equipment stored correctly (shadow boards)?				
Are workbenches free of clutter?				
Are COSHH substances stored securely and tidily?				
Is lifting equipment stored tidily?				
Poor weather				
Are drains clear of blockages?				
Is salt or grit available for clearing ice and snow?				
Lighting				
Is the work area suitably lit?				
Falls				

Are all edges protected?				
Are all ladders secured?				
Offices				
Is the office(s) clean, tidy and free of loose carpet tiles and spillages?				
Are cables tidy?				
Are there suitable arrangements for the storage and collection of waste?				
Are windows cleaned on a periodic basis?				

Appendix 4 Permit to Work

W/C :

HOT WORK PERMIT

NAME & DECRIPTION OF HOT WORKS		MON START	TUE START	WED START	THU START	FRI START
	SIGNED					
	SUPERVISOR					

CHECKS	SITE	OFFICE	SITE	OFFICE	SITE	OFFICE	SITE	OFFICE	SITE	OFFICE
Hot work must cease at least one hour before end of shift. Areas where hot works have been carried out										
Services affected must be isolated before work commences.										
Isolate smoke detectors in the vicinity of hot works.										
A suitable fire extinguisher must be available and be kept close at hand, at all times.										
Supervisors must ensure suitable personal protective equipment (PPE) is provided and worn by operatives.										
All cylinders must be transported and secured upright.										
Valves and hoses must be in good condition.										
All cylinders must have flashback arrestors fitted.										
When not in use, cylinders must be shut off and returned to store.										
LPG cylinders must not be left in the building overnight without formal approval.										
Arc welding equipment will comply with current standards.										
Spent welding rods must be immersed in a bucket of water.										
Minimum radius of hot work must be 2 m from other persons working. Screens should be erected										
Where hot works are required adjacent to combustible material, a fireproof protective mat should be placed between the material and the heat source during the hot works										
Work areas to be kept tidy and free from combustible materials.										
Operatives must remain in the area for 15 minutes after completing work to ensure there is no hot-spot										

	MON END	TUE END	WED END	THU END	FRI END
SIGNED					
SUPERVISOR					

Appendix 5 Training Record

Training Record
Wet Room

Terry Clatworthy | Compliance Manager | 1st October 2023

Synergy Recycling is the trading name of Synergy Asset Services Limited
Company Reg: 04264601 | VAT: 787043701
Synergy Asset Services Ltd T/A Synergy Recycling
Merton Farm, Merton Lane South, Canterbury, Kent - CT4 7BA
01227 462008
email@synrec.co.uk
www.synergy-recycling.co.uk

Training record

Name of company: Synergy Name of employee: _____

Name of supervisor: _____

Instructions to supervisor

The employee and supervisor should sign each area of training listed below as it is completed. The manager responsible should endorse the record and ensure that a copy is retained on file.

The employee with access to all policies and procedures risk assessments and method statements during the on boarding process and any time at work.

Task	Date completed
General responsibilities	
Accident reporting and recording	
Health and welfare	
Personal protective equipment	
Handling Fire extinguishers	
Dust and fumes (Respiratory hazards)	
Noise and vibration	
Hazardous substances	
Identify all items that you can handle	
Hazardous Sign's	
Degassing Fire extinguishers	
Dismantling Fire extinguishers	
Site rules	
Drugs and alcohol	
Manual handling	
Safety signs	
Fire prevention and control	
Electrical safety	
Work equipment and hand-held tools	
Mobile work equipment	
Lifting operations and equipment	
Working at height	
Confined spaces	
Environmental awareness and waste control	
Cylinder handing	
Manual handling	
Environmental awareness and waste control	

I …… have successfully completed all the training above on all policy and procedures and techniques within Synergy.

I …… have verified that the employee is adhering to the established standards and has successfully passed the assessment, demonstrating their capability to work within Synergy on the date……

PAGE | 2

Appendix 6 Training Checklist

Full Name	Department	LEVEL 3			ADR			Asbestos			Authority to			Banksman			COSHH			COSHH			Counterbalanc		
		Status	Completed date	Expiry date	Status	Completed date	Expiry date	Status	Completed date	Expiry date	Status	Completed date	Expiry date	Status	Completed date	Expiry date	Status	Completed date	Expiry date	Status	Completed date	Expiry date	Status	Completed date	Expiry date
Andrew Driver	Recycling Operatives							Pending			Passed		03/11/2027				Passed	19/10/2022	19/10/2024				Passed	12/01/2022	12/01/2025
Antony Benn	Drivers				Passed	20/09/2023	15/12/2027	Pending		14/11/2023							Passed	14/11/2022	14/11/2024				Passed	15/11/2022	15/11/2025
Ashley McKenzie	Recycling Operatives				Passed		20/10/2028	Pending			Passed		03/11/2027				Passed	30/01/2023	30/01/2025				Passed	29/03/2023	29/03/2026
Barry Liversidge	Recycling Operatives							Pending			Passed		03/11/2027				Passed	11/01/2023	11/01/2025				Passed	20/07/2022	20/07/2025

Full Name	Department	CPR Awareness			Driver			Driving at Work			DSE Display			Environmental			Environmental			Fire			Fire Marshal		
		Status	Completed date	Expiry date	Status	Completed date	Expiry date	Status	Completed date	Expiry date	Status	Completed date	Expiry date	Status	Completed date	Expiry date	Status	Completed date	Expiry date	Status	Completed date	Expiry date	Status	Completed date	Expiry date
Andrew Driver	Recycling Operatives	Pending		19/10/2023				Pending						Passed	19/10/2022	19/10/2024				Pending		19/10/2023			
Antony Benn	Drivers	Pending		14/11/2023				Pending		14/11/2023				Passed	14/11/2022	14/11/2024				Pending		14/11/2023			
Ashley McKenzie	Recycling Operatives	Passed	30/01/2023	30/01/2024				Pending						Passed	30/01/2023	30/01/2025				Passed	30/01/2023	30/01/2024			
Barry Liversidge	Recycling Operatives	Passed	17/01/2023	17/01/2024				Pending						Passed	11/01/2023	11/01/2025				Passed	11/01/2023	11/01/2024			

Full Name	Department	Fire Safety			Forklift 31 up			Forklift			Hand-Arm			Health and			Ladder course			Ladders And			Lateness and		
		Status	Completed date	Expiry date	Status	Completed date	Expiry date	Status	Completed date	Expiry date	Status	Completed date	Expiry date	Status	Completed date	Expiry date	Status	Completed date	Expiry date	Status	Completed date	Expiry date	Status	Completed date	Expiry date
Andrew Driver	Recycling Operatives	Pending		19/10/2023							Pending			Passed	19/10/2022	19/10/2024				Pending		19/10/2023	Pending		
Antony Benn	Drivers	Pending		14/11/2023				Passed	06/10/2023	23/10/2024				Passed	14/11/2022	14/11/2024				Pending		14/11/2023			
Ashley McKenzie	Recycling Operatives	Passed	30/01/2023	30/01/2024				Passed	27/09/2023	25/09/2024	Pending			Passed	30/01/2023	30/01/2025				Passed	30/01/2023	30/01/2024	Pending		
Barry Liversidge	Recycling Operatives	Passed	17/01/2023	17/01/2024				Passed	27/09/2023	25/09/2024	Pending			Passed	11/01/2023	11/01/2025				Passed	11/01/2023	11/01/2024	Pending		

Full Name	Department	Legionella and			Lone working			Manual			Personal			Powder Room			Respiratory			Risk			Rough Terrain		
		Status	Completed date	Expiry date	Status	Completed date	Expiry date	Status	Completed date	Expiry date	Status	Completed date	Expiry date	Status	Completed date	Expiry date	Status	Completed date	Expiry date	Status	Completed date	Expiry date	Status	Completed date	Expiry date
Andrew Driver	Recycling Operatives				Passed	19/10/2022	19/10/2024	Pending		19/10/2023	Pending		24/10/2023	Passed	16/10/2025		Pending		24/10/2023	Passed	24/10/2022	24/10/2024	Passed	12/01/2022	12/01/2025
Antony Benn	Drivers				Passed	14/11/2022	14/11/2024	Pending		14/11/2023	Pending		14/11/2023				Pending		14/11/2023	Passed	14/11/2022	14/11/2024	Passed		
Ashley McKenzie	Recycling Operatives				Passed	30/01/2023	30/01/2025	Passed	30/01/2023	30/01/2024	Passed	30/01/2023	30/01/2024	Passed		05/11/2026	Passed	30/01/2023	30/01/2024	Passed	30/01/2023	30/01/2025	Passed	30/03/2023	30/03/2026
Barry Liversidge	Recycling Operatives				Passed	11/01/2023	11/01/2025	Passed	11/01/2023	11/01/2024	Passed	17/01/2023	17/01/2024				Passed	17/01/2023	17/01/2024	Passed	17/01/2023	17/01/2025	Passed	10/01/2022	10/10/2025

Full Name	Department	Short term			sorting bay			Stress in the			Wet room CO2			Wet Room			Wet room			Work Related			Working at		
		Status	Completed date	Expiry date	Status	Completed date	Expiry date	Status	Completed date	Expiry date	Status	Completed date	Expiry date	Status	Completed date	Expiry date	Status	Completed date	Expiry date	Status	Completed date	Expiry date	Status	Completed date	Expiry date
Andrew Driver	Recycling Operatives							Pending		24/10/2023													Pending		19/10/2023
Antony Benn	Drivers							Pending		14/11/2023													Pending		14/11/2023
Ashley McKenzie	Recycling Operatives							Passed	30/01/2023	30/01/2024													Passed	30/01/2023	30/01/2024
Barry Liversidge	Recycling Operatives							Passed	11/01/2023	11/01/2024	Passed		31/10/2024										Passed	11/01/2023	11/01/2024

Appendix 7 Maintenance Schedule

Hydropayne

Plant	sheet	Hours	Last service
Hydrovane	No 223516	36742	11/03/2023

location	Ser No	Model	Make	Type	Date of this inspection
1		Nitrous Oxide Piercing Unit	B.c.h		
2		FE Piercing Unit			
3		Crushing Unit			
5		FE Powder Vacuum Units			
6		Horizontal Band Saw			
7		Scrap Metal Elevator			
8		Forklift trucks			
9		Drills			
10		Pallet trucks			
11		Various Handheld Tools			
12					
tool shed	ISO/IEC 60974-1	Xtm 201 Di	parweld	welder	
		Abrasive wheels			
tool shed	N251905500	I CUT 100	R-tech	plasma cutter	
tool shed	N257905284	I CUT 100	R-tech	Plasma cutter	
jacks room	N159907245	I CUT 100	R-tech	plasma cutter	
Processing room	4677.06.01.001340.J2020		milwaukee	gridner	
Tool shed spare 001	4811.85.01.001195.C2023	M18 FSAG115XB	milwaukee	grinder	

location	serial no	make	type	Jan	Feb	Mar	Apr	May	June	July	Aug	Sep	Oct	Nov	Dec
Tool container	1	Milwaukee	Gridner 4.5 inch												
Tool conatiner	2	Milwuakee	Grinder 4.5 inch												
Tool conatiner	3	Dewalt	Grinder 4.5 inch												
Tool conatiner	4	Dewalt	Grinder 4.5 inch												
Tool conatiner	5	Dewalt	Gridner 4.5 inch												
Tool conatiner	6	Milwaukee	Impact driver												
Tool conatiner	7	Dewalt	Recipocating saw												
Tool conatiner	8														
Tool conatiner	9	Dewalt	9 inch gridner												
Tool conatiner	10	Dewalt	Combi drill												
Tool conatiner	11	Un branded	DA polisher												
Tool conatiner	12	Dremel	Dremel												
Tool conatiner	13	Un branded	Skill saw												
Tool conatiner	14	Makita	Recipocating saw												
Tool conatiner	15	Un branded	Green heat gun												
Tool conatiner	16	Dewalt	SDS Drill												
Tool conatiner	17	Un branded	Black heat gun												
Tool conatiner	18	Milwaukee	Grease gun												
Tool conatiner	19	R-Tech	Plasma												
Tool conatiner	20	R-Tech	Plasma												
Tool conatiner	21	R-Tech	Plasma												
Tool conatiner	22	Parweld	Welder												
Tool conatiner	23	Milwaukee	Combi drill												
Tool conatiner	24	Milwaukee	Gridner 4.5 inch												
Tool conatiner	25	Milwaukee	Nut Gun												
Tool conatiner	26	Milwaukee	Impact driver												
Tool conatiner	27	Milwaukee	Jig saw												
Tool conatiner	28	Milwaukee	9 inch gridner												
Tool conatiner	29	Un branded	110v transformer												
Tool conatiner	30	Milwaukee	Radio												
Tool conatiner	31	Milwaukee	Radio												
Tool conatiner	32	Milwaukee	12.0 ah battery m18												
Tool conatiner	33	Milwaukee	12.0 ah battery m18												
Tool conatiner	34	Milwaukee	9.0 ah battery m18												
Tool conatiner	35	Milwaukee	9.0 ah battery m18												
Tool conatiner	36	Milwaukee	5.0 ah battery m18												
Tool conatiner	37	Dewalt	6.0 ah battery 18 v												
Tool conatiner	38	Dewalt	4.0 ah battery 18v												
Tool conatiner	39	Milwaukee	5.0 ah battery m18												
Tool conatiner	40	Dewalt	4.0 ah battery 18v												
Tool conatiner	41	Milwaukee	6 ah m12 battery												
Tool conatiner	42	Milwaukee	6 ah m12 battery												
Tool conatiner	43	Milwaukee	6 ah m12 battery												
Sorting area	68	Dewalt	18 v 5 ah battery												
Sorting area	69	Dewalt	Radio												
			Name												

location	serial no	make	type	Jan	Feb	Mar	Apr	May	Jun	Jul	Agu	Sep	Oct	Nov	Dec
Processing room	44	Milwaukee	Radio												
Processing room	45	Milwaukee	Radio												
Processing room	46	Milwaukee	m12 6 ah battery												
Processing room	47	Milwaukee	m12 6 ah battery												
Processing room	48	Milwaukee	4.5 inch grinder												
Processing room	49	Milwaukee	m18 5 ah battery												
Processing room	50	Milwaukee	m18 5 ah battery												
Processing room	51	Milwaukee	Charger												
Processing room	52	Un branded	Balloon crusher												
Processing room	53	B.C.H.	Nos machine												
Processing room	54	Un branded	Crusher unit												
Processing room	55	Fiac	Compresssor												
Processing room	56	Crocodile saw	Band saw												
			Name												
			Sign												

Location	Serial no	Make	Type	Jan	Feb	Mar	Apr	May	Jun	July	Agu	Sep	Oct	Nov	Dec
Wet room	57	Dewalt	4 ah 18v battery												
Wet room	58	Dewalt	4 ah 18v battery												
Wet room	59	Dewalt	4 ah 18v battery												
Wet room	60	Milwaukee	M18 5 ah battery												
Wet room	61	Milwaukee	M18 5 ah battery												
Wet room	62	Milwaukee	M18 5 ah battery												
Wet room	63	Milwaukee	Charger												
Wet room	64	Milwaukee	Charger												
Wet room	65	Dewalt	Charger												
Wet room	66	Dewalt	Radio												
Wet room	67	Milwaukee	4.5 inch grinder												
Wet room	68	Milwaukee	4.5 inch grinder												
			Name												
			Sign												

Locaton	Serial no	Make	Type	Jan	Feb	Mar	Apr	May	Jun	Jul	Agu	Sep	Oct	Nov	Dec
Powder room	70	Hydrovane	Compressor												
Powder room	71	Powder vac	Hoover												
Powder room	72	Powder vac	Hoover												
Powder room	73	Un branded	Peircing unit												
Powder room	74	Un branded	110v transformeer												
Powder room	75	Makita	4.5 inch grinder												
Powder room	76	Makita	4.5 inch grinder												
Powder room	77	Milwaukee	Imapct driver												
Powder room	78	Milwaukee	M18 battery 5 ah												
Powder room	79	De walt	Chop saw												
Powder room	80	Milwaukee	Radio												
Powder room	81	Titan	Wet and dry vac												
			Name												
			Sign												

Appendix 8 Plant Defect Check List

W/C : **PLANT DEFECT CHECKLIST**

LADDER 1	MON	TUE	WED	THU	FRI
STILES					
Not cracked, split, twisted, dented or bent					
No splinters or sharp edges					
Free from over wear					
Free from grease, paint etc.					
Feet present and in good order					
RUNGS AND TREADS					
All present, none missing					
Not cracked, split, twisted, dented or bent					
No splinters or sharp edges					
Free from over wear, oil, grease etc.					
No loose					
LADDER FITTINGS					
All intact and fuctional					
Free from corrosion					
Tie rods secure					
Distortion free					
Stabilising bars in step ladders lock correctly					
ROOF HATCH					
Latches					
Hinges					
Chain					
Locking Arm					

LADDER 1	MON	TUE	WED	THU	FRI
STILES					
Not cracked, split, twisted, dented or bent					
No splinters or sharp edges					
Free from over wear					
Free from grease, paint etc.					
Feet present and in good order					
RUNGS AND TREADS					
All present, none missing					
Not cracked, split, twisted, dented or bent					
No splinters or sharp edges					
Free from over wear, oil, grease etc.					
No loose					
LADDER FITTINGS					
All intact and fuctional					
Free from corrosion					
Tie rods secure					
Distortion free					
Stabilising bars in step ladders lock correctly					
ROOF HATCH					
Latches					
Hinges					
Chain					
Locking Arm					

*** DETAILS OF DEFECT FOUND:**

W/C :

PLANT DEFECT CHECKLIST

LADDER 1	MON	TUE	WED	THU	FRI
STILES					
Not cracked, split, twisted, dented or bent					
No splinters or sharp edges					
Free from over wear					
Free from grease, paint etc.					
Feet present and in good order					
RUNGS AND TREADS					
All present, none missing					
Not cracked, split, twisted, dented or bent					
No splinters or sharp edges					
Free from over wear, oil, grease etc.					
No loose					
LADDER FITTINGS					
All intact and fuctional					
Free from corrosion					
Tie rods secure					
Distortion free					
Stabilising bars in step ladders lock correctly					
ROOF HATCH					
Latches					
Hinges					
Chain					
Locking Arm					

*** DETAILS OF DEFECT FOUND:**

Appendix 9 Cylinder ID Pack

PRESSURE VESSEL IDENTIFICATION LIST

LPG

(UN1011/UN1978) (If owned No EWC)

Red/Green - Propane (UN1978)

Other colours - Butane (UN1011)

Ranging in size (kg) = 3.9, 4.5, 5P, 5.5, 6, 6P, 7, 9P, 10P, 11, 11P, 13, 15, 18, 19, 47.

Only collect Calor or Calor subsidiary brands where permitted.

For an exhaustive list of all subsidiary brands and their chief ownership (usually Flogas or Calor) see the UKLPG ownership list.

If an LPG cylinder is from the UK (English markings and brandings) but does not belong to a UKLPG repatriation scheme company it is to be entered into the LPG UK Butane or Propane box within the repatriatable section on the collection paperwork.

If the LPG cylinder is unidentifiable or belongs to an insolvent company no longer trading it is to be entered into the waste section under the non-repatriatable LPG Butane or Propane box.

Any LPG cylinder that is of a foreign origin (identifiable by the branding and text language) is to be entered into the LPG European Butane or Propane box within the repatriatable section on the collection paperwork.

Foreign LPG butane/propane are not identifiable by a colour scheme and come in various shapes, sizes, weights and brands and you will have to check the cylinder for a UN number or contents description.

Smaller Cylinders - Camping Gaz

(UN1011) (No EWC)

Comes in 3 sizes: 907 (large, left), 904 (medium, middle) and 901 (small, right).

May have fittings attached at point of collection, if so leave the fittings attached.

Identifiable by shape and blue heavy steel casing.

Not to be confused with Camping Gaz branded Canisters and Canisters + (below).

Other Cylinders - Brewery Kegs

(No UN Number) (No EWC)

Easily identifiable given their unique shape and size.

Usually empty but may have liquid contents.

Repatriatable and non-gaseous so no waste paperwork or UN number required.

To be consigned as Beer Kegs under the repatriatable section.

Repatriatable Pressure Vessel

Non-Hazardous Waste

Category Dependant on Ownership Status

Hazardous Waste

PRESSURE VESSEL IDENTIFICATION LIST

Smaller Cylinders – Sodastream Cylinders

(UN1013) (No EWC)

These are similar in size and shape to Lecture Cylinders however they are constructed from aluminum rather than steel making them lighter in weight.

Sodastream Cylinders are almost always marked with Sodastream branding making them easy to identify. They are repatriated back to the ownership company (Sodastream) where possible and therefore are to be treated as a non-waste within the collection paperwork.

High Pressure Cylinders - Medical Oxygen

(UN1072) (No EWC)

Most medical oxygen cylinders are repatriatable and are either white composite material or a black and white steel cylinder (pictured right).

These will usually belong to BOC, Air products or Air Liquide.

High Pressure Cylinders - Brewery Cylinders

(UN1013) (No EWC)

Brewery Cylinders are technically high-pressure cylinders but are consigned separately to other high-pressure cylinders given that they are sent through a deferent repatriation route (BCGA & BFBI).

Easily identifiable by their brown/black steel casing, usually with rounded bottoms and a shroud with a brewery's markings and product descriptions.

High Pressure Cylinders - Helium

(UN1046) (No EWC)

Identifiable by their brown colour, often coming in two types as pictured to the right. The first type is a standard high-pressure cylinder often with a brown or black shroud. The second and more common type is a recreational party helium cylinder pictured to the right with a plastic green shroud and handle. Often labeled with a brand such as Heligas.

Repatriatable Pressure Vessel	Category Dependant on Ownership Status
Non-Hazardous Waste	Hazardous Waste

PRESSURE VESSEL IDENTIFICATION LIST

High Pressure Cylinders – Acetylene

(UN1001) (No EWC)

Identifiable by the distinctive mauve/purple colour casing usually with white labelling as pictured to the right. They have different coloured shrouds depending on branding and are usually marked with Air Products, Air Liquide or BOC branding.

Only to be collected if ownership/branding is evident on cylinder since waste acetylene cylinders are difficult to compliantly dispose of.

High Pressure Cylinders – Argon

(UN1006) (No EWC)

Identifiable by the black or green casing with a green neck. They have different coloured shrouds depending on branding and are usually marked with Air Products, Air Liquide or BOC branding.

High Pressure Cylinders - Oxygen

(UN1072) (No EWC)

Identifiable by the black casing with a white neck, sometimes they are entirely black or white. They have different coloured shrouds depending on ownership and are usually marked with Air Products, Air Liquide or BOC branding.

High Pressure Cylinders – Nitrogen

(UN1066) (No EWC)

Identifiable by the silver, white or black casing. They have different coloured shrouds depending on branding and are usually marked with Air Products, Air Liquide or BOC branding.

Repatriatable Pressure Vessel	Category Dependant on Ownership Status
Non-Hazardous Waste	Hazardous Waste

PRESSURE VESSEL IDENTIFICATION LIST

Extinguishers

(UN1044) (EWC 16-05-05)

CO2 – Identifiable by aluminum casing (look for rings underneath if unsure). Also, usually black with white text colour scheme or red with black colour scheme.

Water – Usually lightweight steel casing with a red and white colour scheme.

Foam – Not to be confused with water Extinguishers since both will likely have liquid contents upon collection. Also, lightweight steel but with a red and beige colour scheme.

Powder – Usually heavyweight steel casing with a red and blue colour scheme.

Chemical – Usually red/yellow lightweight steel casing with liquid contents.

High Pressure Cylinders - Fire Suppression System/Trolley

(UN1044) (EWC 16-05-05)

The Fire Suppression Systems can look a lot like standard fire extinguishers however they are to be treated with extra care since they are usually heavier and operate at a higher pressure. Note that some fire suppression systems are fixed into a buildings infrastructure in which case you are to leave the system alone. We are only permitted to collect safely detached and decommissioned systems that have been professionally removed and made ready for collection.

Other Cylinders - Disposable Helium Balloon Cylinders

(UN1046) (EWC 15-01-04)

There are a few similarly shaped cylinders as pictured to the right. Helium Balloon Cylinders are identifiable by having a rubber "nipple" for charging balloons with a green or black plastic twist release. Usually very light weight and pink or white/cream. They come in two sizes as pictured right.

These are usually found in an open-to-atmosphere state at the point of collection since they have been used for their intended purpose by the previous user. Even though likely empty, these cylinders are treated as pressurised with regard to transport and applying a UN number.

Smaller Cylinders - Charge Capsules

(UN1013/UN1070) (EWC 15-01-04)

Contents are usually Nitros Oxide (N20) or Carbon Dioxide (CO2).

These are usually found in an open-to-atmosphere state at the point of collection since they have been used for their intended purpose by the previous user. Even though likely empty, these cylinders are treated as pressurised with regard to transport and applying a UN number.

Repatriatable Pressure Vessel

Non-Hazardous Waste

Category Dependant on Ownership Status

Hazardous Waste

PRESSURE VESSEL IDENTIFICATION LIST

Other Cylinders – Refrigerants

(UN1078) (If Waste EWC 16-05-05) (If owned No EWC)

Refrigerants come in different cylinder types. Some are in an LPG style cylinder and can be identified by their dual twist valves (usually coloured red and blue) and are either grey and blue or grey and yellow.

Other refrigerants look similar to disposable helium balloon cylinders but are usually blue or green in colour and will be marked with text indicating that it is a refrigerant.

Some refrigerants are owned and repatriatable and can be identified with branding such as BOC, Linde etc. and are to be entered under the Refrigerant box in the repatriatable section. Any that are non-repatriatable are to be consigned as Non-repat Refrigerants UN1078 with the above waste code.

Please note: Yellow top refrigerants are to be consigned as Hazardous, refer to hazardous section of guide for further details.

Smaller Cylinders - Calibration Cylinders

(UN1956) (EWC 16-05-05)

Contents vary from cylinder to cylinder.

Usually, a collection of Calibration Cylinders will be arranged with prior descriptions of the cylinders provided including their contents for an accurate description.

If an accurate contents description is not available and there are no indications on the cylinder that the contents are flammable or with any other hazardous properties, the cylinder is to be entered as Calibration Cylinders UN1956 Compressed Gas N.O.S. which is to be written in the notes/other section of the paperwork.

Smaller Cylinders - Life Raft Inflators

(UN1013) (EWC 15-01-04)

These are heavier and larger than Charge Capsules and usually feature a threaded neck as opposed to a puncture disk release system.

These are usually found in an open-to-atmosphere state at the point of collection since they have been used for their intended purpose by the previous user. For this reason, they are usually non-gaseous and can therefore be processed as such upon unloading/sorting to then be processed into component parts. Any that are discovered to be pressurised are segregated at the point of unloading/sorting to be compliantly sent for onward disposal. Even though likely empty, these cylinders are treated as pressurised with regard to transport and applying a UN number.

Repatriatable Pressure Vessel

Non-Hazardous Waste

Category Dependant on Ownership Status

Hazardous Waste

PRESSURE VESSEL IDENTIFICATION LIST

Smaller Cylinders - Canisters

(UN1011/UN1978) (EWC 16-05-04*)

Usually, lightweight aluminum with propane or butane contents.

Most Canisters are used for camping stoves etc and are marked as such.

Not to be confused with Aerosols, both are similar however they are listed under different UN numbers.

Smaller Cylinders - Canisters +

(UN1011/UN1978) (EWC 16-05-04*)

The same as regular Canisters however they have attachments fitted.

Attachments are not to be removed since this may lead to a release of gas. Instead, they are consigned as regular Canisters but are separated at the point of unloading/sorting to be stored in separate IBC lanes for separate disposal routes.

To be entered in the Canisters box within the collection paperwork alongside regular Canisters.

Smaller Cylinders – Aerosols

(UN1950) (EWC 16-05-04*)

Usually have aluminum lightweight casing and include deodorants, air fresheners, hair spray, spray paint etc.

Not to be confused with Canisters which have a similar appearance however they are consigned under different UN numbers.

Aerosols are to be entered manually within the notes/other section on the collection paperwork.

Smaller Cylinders - MAP/Rothenberger

(UN1978) (EWC 16-05-04*)

The same as regular Canisters however they have a harder casing and a uniform shape as pictured to the right.

Consigned as regular Canisters but are separated at the point of unloading/sorting to be stored in separate IBC lanes for separate disposal routes.

Repatriatable Pressure Vessel	Category Dependant on Ownership Status
Non-Hazardous Waste	Hazardous Waste

PRESSURE VESSEL IDENTIFICATION LIST

Smaller Cylinders - Hard Case Canisters

(UN1013/UN1006) (EWC 16-05-04*)

Usually used for welding purposes and is often CO2 or a CO2 Argon mix. Despite some not possessing any hazardous properties, they are all to be treated as Canisters with regard to the collection paperwork.

A similar size and shape to larger regular Canisters but with a thick heavy steel casing therefore requiring them to be segregated at the point of unloading/sorting to then be stored within a separate IBC lane for onward disposal.

Extinguishers - Halon

(UN1974) (EWC 16-05-04*)

Halon is usually smaller than other Fire Extinguishers. Identifiable by green lightweight casing or green markings on a red background.

Please ensure that Halon Extinguishers are properly segregated from other Extinguishers within the collection paperwork since they have different UN numbers and EWC statuses.

Other Cylinders - LPG Autotanks

(UN1978) (EWC 16-05-04*)

Autotanks are very distinguishable and come in two shapes, round/doughnut shaped or long tubular shaped. They are always black or rusted and contain LPG Propane.

To be entered in the notes/other section of the paperwork.

Other Cylinders - Froth Packs

(UN1950) (EWC 16-05-04*)

Froth Packs can easily be mistaken for disposable helium balloon cylinders given their cream colouring and similar shape. To differentiate between the two, Froth Packs have thinner handles, no rubber "nipple" and usually have labelling and marking indicating that they are froth packs.

To be entered in the notes/other section of the paperwork.

Repatriatable Pressure Vessel

Non-Hazardous Waste

Category Dependant on Ownership Status

Hazardous Waste

PRESSURE VESSEL IDENTIFICATION LIST

Smaller Cylinders - Spray Adhesives

(UN1950) (EWC 16-05-04*)

Usually have aluminum lightweight casing and propelle adhesive substances such as glue and can also hold expanding foam for building purposes.

Sometimes attached with nossels which are to be left attached.

Spray Adhesives are to be entered manually within the notes/other section on the collection paperwork.

Other Cylinders – Refrigerants

(UN1078) (If Waste EWC 16-05-04*) (If owned No EWC)

Refrigerants come in different cylinder types. Some are in an LPG style cylinder and can be identified by their dual twist valves (usually coloured red and blue) and are either grey and blue or grey and yellow.

Hazardous refrigerants are identified by their yellow top and/or their UN hazard marking.

Some refrigerants are owned and repatriatable and can be identified with branding such as BOC, Linde etc. and are to be entered under the Refrigerant box in the repatriatable section. Any that are non-repatriatable are to be consigned as Non-repat Refrigerants UN1078 with the above waste code.

Smaller Cylinders (Lecture Cylinders)

(Various UN Numbers) (EWC 16-05-04*)

Contents vary from cylinder to cylinder.

Usually, a collection of lecture cylinders will be arranged with prior descriptions of the cylinders provided including their contents for an accurate description.

An accurate description must be provided prior to the collection since the contents can vary amongst a wide scope of different hazards and properties rendering them as inappropriate for some mixed loads.

To be entered in the notes/other section of the paperwork.

Smaller Cylinders - Calibration Cylinders

(UN1954) (EWC 16-05-04*)

Contents vary from cylinder to cylinder.

Usually, a collection of Calibration Cylinders will be arranged with prior descriptions of the cylinders provided including their contents for an accurate description.

If an accurate contents description is not available, check the cylinder for a UN number and/or a hazard diamond. If flammable, the cylinder is to be entered as Calibration Cylinders UN1954 Compressed Gas N.O.S, Flammable which is to be written in the notes/other section of the paperwork. If non-flammable, please see non-hazardous section.

Repatriatable Pressure Vessel

Non-Hazardous Waste

Category Dependant on Ownership Status

Hazardous Waste

UMBRELLA ENVIRONMENTAL

PROTECTING YOUR BUSINESS

9 Goldington Road Bedford MK40 3JY

www.umbrella-environmental.co.uk

andrew@umbrellaenvironmental.co.uk

Mob: 07498 671713