



**U M B R E L L A**  
**ENVIRONMENTAL**  
PROTECTING YOUR BUSINESS

## Non-Technical Summary

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**CIWM**

**Affiliated Organisation 2022**

Together, we stand for a world beyond waste

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**Registered Office:**

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CT4 7BA

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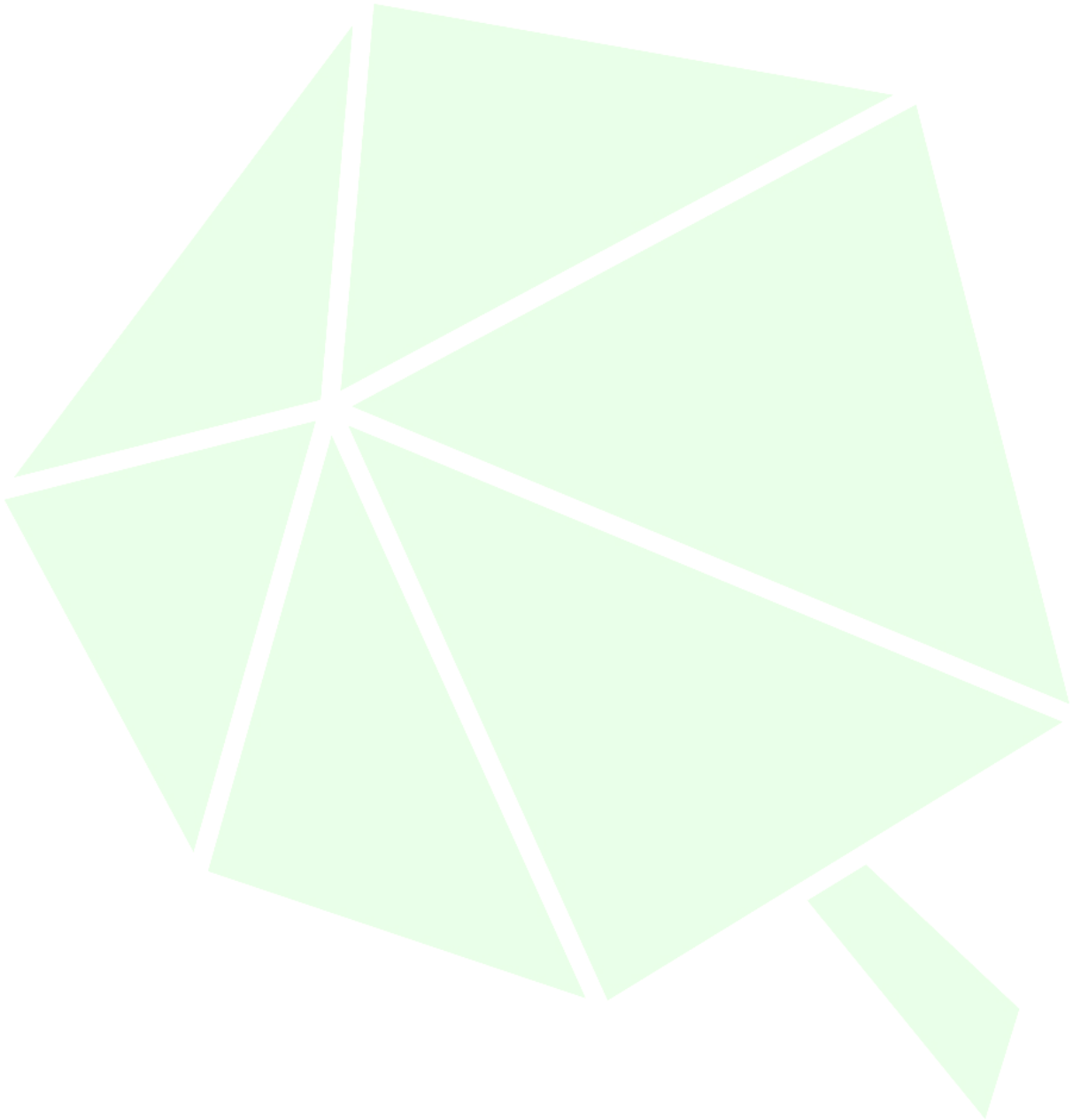
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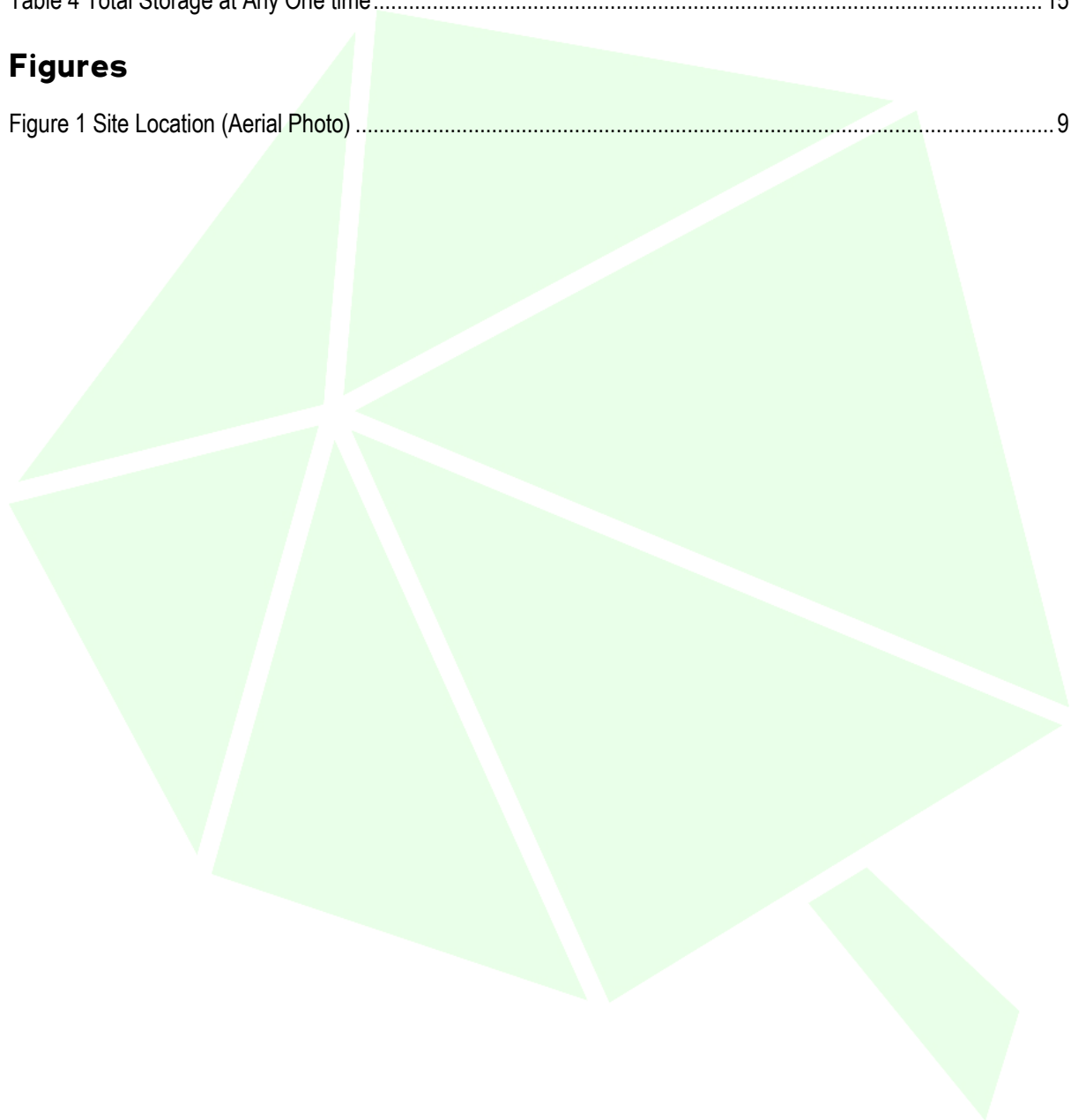
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## Terms and Definitions

Not all terms will be used in this document.

Term	Definition
<b>Auditor</b>	Person with the competence to conduct an audit.
<b>Continual improvement</b>	Recurring process of enhancing the environmental management system in order to achieve improvements in overall environmental performance.
<b>Corrective action</b>	Action to eliminate the cause of a detected nonconformity.
<b>Document</b>	Information and its supporting media.
<b>Environment</b>	Surroundings in which site operates, including air, water, land, natural resources, flora, fauna, humans, and their interrelation.
<b>Environmental aspect (EA)</b>	Elements of sites activities or products or services that can interact with the environment.
<b>Environmental impact</b>	Any change to the environment, whether adverse or beneficial, wholly or partially resulting from sites environmental aspects.
<b>Environmental management system (EMS)</b>	Part of sites management system used to develop and implement its environmental policy and manage its environmental aspects.
<b>Environmental objective</b>	Overall environmental goal, consistent with the environmental policy.
<b>Environmental performance</b>	Measurable results of sites management of its environmental aspects.
<b>Environmental policy</b>	Overall intentions and directions of sites related to its environmental performance.
<b>Environmental target</b>	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.
<b>Interested party</b>	Person or group concerned with or affected by the environmental performance of site.
<b>Internal audit</b>	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.
<b>Nonconformity</b>	Non-fulfilment of a requirement.

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



# 1 INTRODUCTION

This is the Non-Technical Summary (NTS) 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.

This NTS provides an overview of:

- Explanation of what is being applied for;
- Summary of the activities;
- A summary of key technical standards, controls and mitigations that are proposed.

Further to support the application further information is submitted;

- Application Forms (Parts A, C2, C3, C4 and F1) and associated appendices, List of Directors and WAMITAB/Operator Competence Certificates;
- Associated Drawings;
- Environmental Risk Assessment (ERA);
- Best Available Techniques Assessment ;
- Environmental Management System (EMS)/ Operating Techniques document;
- Site Working Plan;
- Baseline Site Condition Report (SCR);
- Noise Impact Assessment (NIA);
- Noise and Vibration Management Plan (NVMP) and
- Fire Prevention Plan (FPP).

## 1.1 Pre-Application Discussions

Enhanced pre app discussions (for permit EPR/FB3602HU/V002) were requested from the Environment Agency (EA) on 10/03/2023 further information and clarity provided and requested on 12/06/2023 and 24/07/2023 with a final response from the EA on the 23/08/2023 which is located in section 01 of this application pack.

## 1.2 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 018.1\_09\_006 1 km Sensitive Receptors and the extant of the permit boundary on 018.1\_09\_001 Permit Boundary Plan in section 11 of this application pack.

All sensitive receptors up to 2 km are identified on 018.1\_09\_006 2 km Sensitive Receptors identifying sensitive 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 018.1\_09\_007 10 km Sensitive Receptors.

Figure 1 Site Location (Aerial Photo)



(Google Satellite)

Image in Figure 1 Site Location (Aerial Photo) above shows the existing permit boundary and the hashed green area shows the proposed increase to the permit boundary.

**1.3 Current Permit**

The current permit allows for:

Table S1.1 activities

Description of activities for waste operations	Limits of activities
<p>Transfer of hazardous and non-hazardous waste</p> <p>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)</p> <p>R5: Recycling/reclamation of other inorganic materials</p> <p>D15: Storage pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where the waste is produced)</p> <p>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</p>	<p>Physical treatment including manual sorting and separation of hazardous and non-hazardous waste for disposal (no more than 50 tonnes per day) or recovery.</p> <p>The maximum quantity of hazardous waste that can be stored at the site shall not exceed 50 tonnes at any one time.</p> <p>Subject to any other requirements of this permit wastes shall be stored for no longer than 3 months.</p> <p>Waste types as specified in Table S2.1.</p>
<p>Treatment of non-hazardous waste</p> <p>R4: Recycling/reclamation of metals and metal compounds</p> <p>R5: Recycling/reclamation of other inorganic materials</p> <p>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)</p> <p>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</p> <p>D15: Storage pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where the waste is produced)</p>	<p>Physical treatment including sorting, separation and manual dismantling of non-hazardous waste for disposal (no more than 50 tonnes per day) or recovery.</p> <p>Treatment is limited to the discharge of the contents of fire extinguishers and dismantling by removal of valves and other parts from cylinders to allow recycling of the metals, plastic and rubber.</p> <p>Subject to any other requirements of this permit wastes shall be stored for no longer than 3 months.</p> <p>Waste types as specified in Table S2.2.</p>

## 2 OVERVIEW OF APPLICATION

The application is to increase the tonnages of hazardous waste stored and treated on site due to a change in waste classification from non hazardous to hazardous of certain waste streams, varying the permit from a bespoke waste to an installation registration as the site meets the thresholds for an installation activity, to add an additional 9 waste codes to the permit as well as increase the permitted area see Figure 1 Site Location (Aerial Photo).

### Additional Waste codes

- Lead acid (vehicle) 16-16-01\*
- Lead acid (other) 20-01-33\*
- Nickel-Cadmium 16-06-02\*
- Mercury containing 16-06-03\*
- Alkaline 20-01-34
- Alkaline 16-06-04
- Other Lithium or Lithium ion Batteries 16-06-05
- Mixed household type batteries-separately collected 20-01-33\*
- Tyres 16-01-03

A full list of existing and proposed waste codes can be found in Table 2 Permitted List of Waste.

### 2.1 Operations

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	<p>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)</p> <p>R5: Recycling/reclamation of other inorganic materials</p> <p>D15: Storage pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where the waste is</p>	<p>Physical treatment including manual sorting and separation of hazardous and non-hazardous waste for disposal (no more than 90 tonnes per day) or recovery.</p> <p>The maximum quantity of hazardous waste that can be stored at the site shall not exceed 100 tonnes at any one time.</p> <p>Subject to any other requirements of this permit wastes shall be stored for no longer than 3 months.</p> <p>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</p>

	<p>produced)</p> <p>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</p>	<p>recycling of the metals, plastic and rubber.</p> <p>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 rubber.</p> <p>Manual dismantling to include the use of hand powered hand tools such as angle grinder and plasma cutter to reduce fraction size of waste.</p> <p>Subject to any other requirements of this permit wastes shall be stored for no longer than 3 months.</p>
<p>Section 5.6 - temporary storage of hazardous waste.</p>	<p>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)</p>	<p>Temporary Storage of hazardous waste</p>
<p>Waste Operation</p>		
<p>- non -hazardous waste installation – physico - chemical treatment</p>	<p>R4: Recycling/reclamation of metals and metal compounds</p> <p>R5: Recycling/reclamation of other inorganic materials</p> <p>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)</p> <p>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</p>	<p>Physical treatment including manual sorting and separation of hazardous and non-hazardous waste for disposal (no more than 90 tonnes per day) or recovery.</p> <p>Subject to any other requirements of this permit wastes shall be stored for no longer than 3 months.</p> <p>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.</p> <p>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 rubber.</p>

		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.
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 Storage/chemical Storage	Diesel Hydraulic Oils / Lubricating Oils Lubricating Oils	2500 litres 2 drums up to 205 litre per drum. 2 drums up to 205 litre per drum.

## 2.2 Waste Acceptance

Waste accepted at the site is restricted to that described in the List of Wastes, Section 10, 018.1\_05\_007 LoW of this application pack.

As a minimum, the waste acceptance procedure will include.

- address/location
- identity of the producer
- the physical appearance of the waste
- amount of waste being accepted
- identifiable EWC Code

Site will only accept waste that is permitted and complies. Non-conforming wastes will be rejected or if identified after delivery, isolated and returned to producer.

Incoming waste will be brought to the site by registered waste carriers. Each load would be subject to the waste acceptance procedure and would be inspected by the Technically Competent Manager (TCM) or appropriately trained individual prior to being stored and prior to treatment.

## 2.3 Waste Storage

Table 2 Permitted List of Waste

Waste code	Description
------------	-------------

<b>15 Waste packaging, absorbents, wiping cloths, filter materials and protective clothing not otherwise specified</b>	
<b>15 01</b>	<b>packaging (including separately collected municipal packaging waste)</b>
15 01 04	metallic packaging (canisters only)
15 01 10*	packaging containing residues of or contaminated by hazardous substances (canisters only)
<b>16</b>	<b>WASTES NOT OTHERWISE SPECIFIED IN THE LIST</b>
<b>16 01</b>	<b>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)</b>
16 01 03	end-of-life tyres
<b>16 Wastes not otherwise specified in the list</b>	
<b>16 05</b>	<b>gases in pressure containers and discarded chemicals</b>
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.
<b>16 06</b>	<b>batteries and accumulators</b>
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
<b>20</b>	<b>MUNICIPAL WASTES (HOUSEHOLD WASTE AND SIMILAR COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL WASTES) INCLUDING SEPARATELY COLLECTED FRACTIONS</b>
<b>20 01</b>	<b>separately collected fractions (except 15 01)</b>
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

Table 3 Total Annual Waste Types

Annual throughput combined up to 30,000 tonnes p.a.

<b>EWC</b>	<b>Material</b>	<b>Tonnes p.a.</b>
15 01 04	metallic packaging (canisters only)	Up to 25,000
15 01 10*	packaging containing residues of or contaminated by hazardous substances (canisters only)	Up to 5,000
16 01 03	end-of-life tyres	200
16 05 04*	gases in pressure containers (including halons) containing hazardous substances.	Up to 5,000

16 05 05	gases in pressure containers other than those mentioned in 16 05 04.	Up to 25,000
16 06 01*	lead batteries	Up to 5,000
16-06-02*	Ni-Cd batteries	Up to 5,000
16-06-03*	mercury-containing batteries	Up to 5,000
16 06 04	alkaline batteries (except 16 06 03)	Up to 25,000
16 06 05	other batteries and accumulators	Up to 25,000
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	Up to 5,000
20 01 34	batteries and accumulators other than those mentioned in 20 01 33	Up to 25,000

Table 4 Total Storage at Any One time

Area of Site	Waste Types	Maximum total storage volume (m <sup>3</sup> )
Ferrous Metals	19-12-02	240
Processing Stock	15-01-04 16-05-05	240
Fire Extinguisher (Powder)	16-05-05	240
Fire Extinguisher (Wets)	16-05-05	120
Fire Extinguisher (CO2)	16-05-05	80
Powder	19-12-02	20
Plastic/Rubber	19-12-12/19-12-04	40
Haz Specialist, MAPP, Canisters, Aerosols, Refrigerants, Autotanks, Halon, Adhesives	16-05-04*	180
Nitrous Oxide	16-05-04*	180



Sorting Bay	16-05-05, 16-05-04*, 15-01-04	N/A
Hazardous ISO	16-05-05, 16-05-04*	10
High Pressure Inbox	16-05-05, 16-05-04*	40
High Pressures	16-05-05, 16-05-04*	120
Acetylene	16-05-04*	30
Batteries	16 06 01* 16-06-02* 16-06-03* 16 06 04 16 06 05	10
Tyres	16-01-03	N/A
<b>Totals</b>		<b>1430 m<sup>3</sup></b>

**2.4 Waste Handling and Processing**

**2.4.1 Cylinder Sorting**

All yard staff are trained in cylinder identification and are familiar with EWC codes and waste segregation requirements. At the point of unloading the mixed goods from the collection vehicle through the. Above highlighted steps, the yard manager is then responsible for segregating the waste from the owned good primarily to avoid contamination and improper storage. Secondly the Yard Manager will segregate the different cylinder types into assorted labelled IBCs within the sorting area. Once full of a single waste stream, these IBCs are then checked for compliant labelling and contents before being forklifted to its assigned storage bay as highlighted within the site plan. Once identified and stored, cylinders should not be stored on site for more than 3 months as stipulated within Synergy’s permit.

**2.4.2 Powder Extraction**

Powder extinguishers require compliant extraction using a bespoke extractor that works on a sealed system. The powder is removed from these extinguishers via the extinguishers nozzle if the trigger mechanism is still functional, and through piercing a small hole within the body of the extinguisher to expose the remainder of any powder residues, the vacuum is capable of removing said particles. Only once the extinguisher is empty can any decommissioning take place.

**2.4.3 Water/Foam Extraction**

Water and Foam extinguishers are processed in a different manner due to the liquid nature of their contents. The extinguisher is rested within a cylinder brace to allow for safe discharge into a sealed IBC via a bespoke system.

The sealed IBC is situated on a 2000litre bund to allow for any leakages to be contained without the liquids coming into contact with the site surface and percolating lower.

#### **2.4.4 Cylinder Venting**

To ensure that non-hazardous cylinders are safe to be decommissioned without a risk of sudden pressure release or rupture, non-hazardous inert gaseous contents are slowly and safely vented to atmosphere within a safe cylinder brace. The brace also allows for minimal contact between the operator and the cylinder as the discharge of pressurised gases can create vapour freeze.

#### **2.4.5 Cylinder Decommissioning**

In line with Synergy's permit, non-hazardous cylinders and extinguishers are compliantly decommissioned using manual tools and static plant into component parts such as plastic, rubber, ferrous and non-ferrous metal for onward recycling at bespoke facilities. All solid bi-product materials are stored in heavy duty tonne bags in separate containers ready for off-take.

#### **2.4.6 Scrap Loading**

Ferrous scrap metal arising from decommissioned cylinders and extinguishers is accumulated within IBCs and stored within a non-hazardous waste bay before being loaded in bulk into a walking floor trailer using a scrap elevator and telehandler.

#### **2.4.7 Transfer of waste**

The below waste will only be accepted to site in order to bulk and transfer for further disposal or recovery under R13<sup>1</sup> and D15<sup>2</sup> codes

- Waste Tyres
- Lead acid (vehicle) 16-16-01\*
- Lead acid (other) 20-01-33\*
- Nickel-Cadmium 16-06-02\*
- Mercury containing 16-06-03\*
- Alkaline 20-01-34
- Alkaline 16-06-04
- Other Lithium or Lithium ion Batteries 16-06-05
- Mixed household type batteries-separately collected 20-01-33\*

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<sup>1</sup> R13\* Storage of wastes pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced)

<sup>2</sup> D15 Storage pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where it is produced)

## 2.5 Site Management

A Technically Competent Manager (TCM) manages the operation and attends site in compliance with the regulatory defined attendance requirement. Individuals such as site supervisors or yard managers can be trained to carry out ongoing site operations, office and plant operations in lieu of the TCM when not in attendance.

During hours of operation there will be a minimum of one member of staff on site, who will be fully conversant with the requirements of the Environmental Permit and the Environmental Management System regarding the following:

- waste acceptance and control procedures
- operational controls and environmental monitoring
- maintenance
- record keeping
- emergency action plans
- Fugitive Emissions

### 3 APPLICATION CONTENTS

#### 3.1 Application Forms

Parts A, C2, C4, and F1 of the EA's EP application forms have been completed in support of this variation application and are enclosed as section 02. The application forms also require the following additional information, which has been included:

- Appendix A: List of Directors;
- Appendix B: WAMITAB Certificates and Operator Competence Certificates; and

#### 3.2 Application Fee

£45,450.00

#### 3.3 Environmental Risk Assessment

An Environmental Risk Assessment (ERA) (018.1\_05\_002) is located in section 05 of this application pack. The ERA identifies the sites setting, environmental hazards caused by the waste activity and the operators mitigation methods whether than be hard engineering or managerial procedures. This mitigation is designed to protect the environment from fugitive emissions or point source emissions if stated.

The site is operated by **Synergy Asset Services Limited** An Environmental Management System (EMS) (018.1\_05\_003) has been created detailing the sites operations and any environmental controls. The EMS explains the sites operations, maintenance procedures and describes the emergency response in the event of an accident and or incident

#### 3.4 Site Condition Report

A Baseline Site Condition Report (SCR) is a requirement for the addition of a listed activity. The baseline SCR describes the condition of the site and will provide a point of reference and baseline environmental data. Therefore, when the EP is surrendered it can be demonstrated that there has been no deterioration in the condition of the land as a result of the proposed operations and ensure that the condition of the land is in a 'satisfactory state' on surrender of the EP.

The site will continue to operate with due regard to the conditions of the EP and all relevant environmental legislation to ensure that the site does not pose a significant risk to the surrounding human and natural environment.

The Baseline SCR (reference 018.1\_05\_006) is included as section 09 of this EP variation application.

### **3.5 Operating Techniques and Environmental Management System**

The site will be operated in accordance with the Operating Techniques (OT) (018.1\_05\_008) and EMS document. This document sets out best practice for operating the site, based on legislation and best available techniques in the industry. It will also include associated procedures which the site will operate in accordance with.

The OT and EMS will ensure that:

- The risks that the activities pose to the environment are identified;
- The measures that are required to minimise the risks are identified;
- The activities are managed in accordance with the OT and EMS;
- Performance against the management system is audited at regular intervals; and
- The EP is complied with.

The OT and EMS (reference 018.1\_05\_003 & 018.1\_05\_008) is included as section 06 of this EP variation application.

### **3.6 Fire Prevention Plan**

The Fire Prevention Plan (FPP) follows EA guidance for FPPs and details the required mitigation and management methods to prevent a fire of combustible materials stored on site.

The FPP identifies measures to be employed to reduce the likelihood of fires at the site. In addition, the plan identifies measures to be employed in the event of a fire to limit the damage caused to the environment or human health.

The FPP (reference 018.1\_05\_004) is enclosed as section 07 of this EP variation application.

### **3.7 Odour Management Plan**

During the pre application stage the EA were requested to identify if an Odour Management Plan (OMP) was required. The EA identified that it was not the ERA 018.1\_05\_002 presented in section 05 further supports this.

The OMP will be incorporated into the site's procedures and will be revised as necessary to ensure that it remains appropriate to the activities occurring on site and that any changes in conditions relating to odour management are dealt with as part of those revisions. In particular, the monitoring procedures and compliance actions will be updated as required by the procedures within the OMP.

### **3.8 Dust Emissions Management Plan**

During the pre application stage the EA were requested to identify if an Dust Emission Management Plan (DEMP) was required. The EA identified that it was not the ERA 018.1\_05\_002 presented in section 05 further supports this.

The DEMP will be incorporated into the site's procedures and will be revised as necessary to ensure that it remains appropriate to the activities occurring on site and that any changes in conditions relating to dust management are

dealt with as part of those revisions. In particular, the monitoring procedures and compliance actions will be updated as required by the procedures within the DEMP.

### 3.9 Appropriate Measures

Synergy Asset Services Limited is managed in accordance with ISO 14001 in addition to this the EMS and operating instructions, BAT assessment detail the managerial procedures implemented on site to minimise the risk of accidents, emissions and their impact on employees, people and local receptors.

These documents include detailed process descriptions, relevant roles and responsibilities to ensure the safe and competent management of the site to maintain compliance with the EP.

Documents cover the following;

- Management;
- Site operations
- Process controls; and
- Information

Managerial procedures will ensure that:

- Risks that the activities pose to the environment are identified;
- The measures that are required to minimise the risk are identified;
- Activities are managed in accordance with the management systems
- Performance is monitored
- EP is complied with and other relevant legislation.

Guidance reviewed for this application but not limited to;

- Best Available Techniques (BAT) Reference Document for Waste Treatment Industrial Emissions Directive 2010/75/EU (Integrated Pollution Prevention and Control); EUR 29362 EN; Publication Office of the European Union, Luxembourg, 2018
- Sector Guidance Note IPPC S5.06 'Guidance for the Recovery and Disposal of Hazardous and Non-Hazardous waste' May 2013 European Directive 2010/75/EU<sup>3</sup>
- Guidance for the storage and treatment of aerosol canisters and similar packaged wastes An addendum to Sector Guidance Note IPPC S5.0 (Version 1.0 November 11)<sup>4</sup>
- Chemical waste: appropriate measures for permitted facilities<sup>5</sup>

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<sup>3</sup>

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/298118/LIT\\_8199\\_dd704\\_c.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/298118/LIT_8199_dd704_c.pdf)

<sup>4</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/300897/geho1111bved-e-e.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/300897/geho1111bved-e-e.pdf)

<sup>5</sup> <https://www.gov.uk/guidance/chemical-waste-appropriate-measures-for-permitted-facilities>

### 3.10 Drawings

A suite of drawings has been produced to detail all characteristics of the site relevant to the variation application and are enclosed as section 11 of this EP variation application. The full list of drawings produced is as follows:

Ref	Name	Revision
018.1_09_001	Permit Boundary Plan	REV A
018.1_09_002	FRS Route Plan	REV A
018.1_09_004	Site Layout Plan	REV A
018.1_09_006	2 km Sensitive Receptors	REV A
018.1_09_007	10 km Sensitive Receptors	REV A

### 3.11 Additional Plans

#### 3.11.1 Noise Impact Assessment and Noise and Vibration Management Plan

The ERA identified that an Noise and Vibration Management Plan (NVMP) was not required supporting evidence is shown in the ERA 018.1\_05\_002 in section 05 of this application pack.

## 4 TECHNICAL STANDARDS

The following technical standards have been utilised in the design and development of the proposed activities, the preparation of this Environmental Permit application, and will govern permitted site activities:

- Sector Guidance Note IPPC S5.06 'Guidance for the Recovery and Disposal of Hazardous and Non-Hazardous waste' May 2013 European Directive 2010/75/EU<sup>6</sup>
- Noise and vibration management: environmental permits<sup>7</sup>
- Develop a management system: environmental permits.<sup>8</sup>
- Control and monitor emissions for your environmental permit<sup>9</sup>
- Containment systems for the prevention of pollution (C736)<sup>10</sup>
- Best Available Techniques (BAT) Reference Document for Waste Treatment Industrial Emissions Directive 2010/75/EU (Integrated Pollution Prevention and Control); EUR 29362 EN; Publication Office of the European Union, Luxembourg, 2018
- Non-hazardous and inert waste: appropriate measures for permitted facilities<sup>11</sup>
- Relevant EA Guidance e.g. Environmental Risk Assessment's, DEMP's, FPP's.

As an 'installation' under the Industrial Emissions Directive the permitted site must achieve 'BAT'. Best Available Techniques (BAT) means the available techniques which are the best for preventing or minimising emissions and impacts on the environment. Techniques include both technology used and the way the installation is designed, built, maintained, operated and ultimately decommissioned.

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[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/298118/LIT\\_8199\\_dd704c.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/298118/LIT_8199_dd704c.pdf)

<sup>7</sup> <https://www.gov.uk/government/publications/noise-and-vibration-management-environmental-permits/noise-and-vibration-management-environmental-permits>

<sup>8</sup> <https://www.gov.uk/guidance/develop-a-management-system-environmental-permits>

<sup>9</sup> <https://www.gov.uk/guidance/control-and-monitor-emissions-for-your-environmental-permit>

<sup>10</sup> <https://www.ciria.org/>

<sup>11</sup> <https://www.gov.uk/guidance/non-hazardous-and-inert-waste-appropriate-measures-for-permitted-facilities>





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