

Lakeside MRF Ltd

## Chemical Waste Appropriate Measures Assessment

Lakeside MRF Limited  
Coventry Recycling Facility  
Templar Avenue  
off Torrington Avenue  
Coventry  
CV4 9AP



PROVIDING SOLUTIONS, ENSURING COMPLIANCE

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T 01952 879705 E [info@westburyenv.co.uk](mailto:info@westburyenv.co.uk)

A Agriculture House, Southwater Way  
Telford, Shropshire, TF3 4NR

W [www.westburyenv.co.uk](http://www.westburyenv.co.uk)



<b>General Management Appropriate Measures</b>	
<b>Lakeside MRF Ltd have a comprehensive EMS that complies with all the requirements of the General Management appropriate measures guidance with the exception of those items mentioned below:</b> (NB Where the item includes multiple criteria, we have listed only the criteria that is not complied with)	
<b>The below appropriate measures are considered to be not applicable:</b>	
2.1.1 (Cont)	G. site infrastructure plan. L. pest management plan, if required.
Reasons:	The Site has little infrastructure and therefore does not need an infrastructure plan, and the Site does not need a pest management plan.
<b>The below appropriate measures are not currently complied with but will be added to the EMS:</b>	
	B. an environmental policy that is approved by senior managers and includes the continuous improvement of the facility's environmental performance. You plan and establish the resources, procedures, objectives and targets needed for environmental performance alongside your financial planning and investment. E. communication (for example, of performance measures and targets)
2.1.1 (Cont)	B. You review the development of cleaner technologies and their applicability to site operations. C. When designing new plant, you make sure you assess the environmental impacts from the plant's operating life and eventual decommissioning. You consider the risks a changing climate poses to your operations. You have appropriate plans in place to assess and manage future risks.
2.2.4	4. The person carrying out the technical appraisal of a waste's suitability for receipt at pre acceptance must have the minimum of a Higher National Certificate (HNC) in chemistry (or equivalent qualification). For the following wastes, technical appraisals must be carried out by a person who has had enough training to determine the suitability of the waste for the site:  A. asbestos. B. contaminated clothing and rags. C. 'articles', for example waste electronic equipment or batteries. D. contaminated wood. E. solid non-hazardous waste other than 'mirror entries' (where waste may be allocated to a hazardous entry or to a non-hazardous entry according to the European List of Waste)
2.2.5	5. If you need to sample, check (other than visually), or test a hazardous waste when you accept it, acceptance must be supervised by someone with the minimum of an HNC in chemistry (or equivalent qualification). At sites where the waste needs only a visual check, the person who receives the waste must have had enough training to be able to identify and manage any non-conformances in the load received.
2.2.7	Any required analysis must be done by someone with the minimum of an HNC in chemistry (or equivalent qualification).
2.3.3	Particular areas to consider may include: A. waste types.
2.3.4	You must assess the risk of accidents and their consequences. 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 6 questions: A. how likely is it that the accident will happen? B. what may be emitted and how much? C. where will the emission go – what are the pathways and receptors?+B24-what are the consequences? D. what is the overall significance of the risk? E. what can you do to prevent or reduce the risk?
2.3.8	You must appoint one facility employee as an emergency co-ordinator who will take lead responsibility for implementing the plan. You must train your employees so they can perform their duties effectively and safely and know how to respond to an emergency.



2.4.1	1. You must keep apart incompatible or segregated wastes and substances by their hazardous properties.
2.4.8	You must consider and, if appropriate, plan for the possibility that you need to contain or abate accidental emissions from: A. overflows B. vents C. safety relief valves D. bursting discs If this is not advisable on safety grounds, you must focus on reducing the probability of the emission.
2.5.3	You must make your customers aware of your contingency plan, and of the circumstances in which you would stop accepting waste from them.
2.5.4	You should consider whether the sites or companies you rely on in your contingency plan: A. can take the waste at short notice B. are authorised to do so in the quantities and types likely to be needed – in addition to carrying out their existing activities
2.5.5	5. You should not discount alternative disposal or recovery options on the basis of extra cost or geographical distance if doing so means you could exceed your permitted storage limits or compromise your storage procedures.
2.6.1	1. You must consider how you will decommission the plant at the design stage, and plan how you will minimise risks during decommissioning.
2.6.2	2. For existing plants where potential risks are identified, you must have a programme of design improvements. These design improvements need to make sure you: A. avoid using underground tanks and pipework – if it is not economically possible to replace them, you must protect them by secondary containment or a suitable monitoring programme B. drain and clean out vessels and pipework before dismantling C. use insulation which you can dismantle easily without dust or hazard D. use recyclable materials, taking into account operational or other environmental objectives
2.6.3	3. You must have and maintain a decommissioning plan to demonstrate that: A. plant will be decommissioned without causing pollution B. the site will be returned to a satisfactory condition
2.6.4	4. Your decommissioning plan should include details on: A. whether you will remove or flush out pipelines and vessels (where appropriate) and how you will empty them of any potentially harmful contents B. site plans showing the location of all underground pipes and vessels C. the method and resources needed to clear any on-site lagoons D. the method for closing any on-site landfills E. how asbestos or other potentially harmful materials will be removed, unless we have agreed it is reasonable to leave such liabilities to future owners F. methods for dismantling buildings and other structures, and for protecting surface water and groundwater during construction or demolition at your site G. any soil testing needed to check for pollution caused by site activities, and information on any remediation needed to return the site to a satisfactory state when you stop activities, as defined by the initial site condition report H. the measures proposed, once activities have definitively stopped, to avoid any pollution risk and to return the site of operation to a satisfactory state (including, where appropriate, measures relating to the design and construction of the plant) I. the clearing of deposited residues, waste and any contamination resulting from the waste treatment activities
2.6.5	5. You should make sure that equipment taken out of use is decontaminated and removed from the site.
<p><b>The below appropriate measures are not currently complied with and we propose they are included as an improvement condition:</b></p>	



2.4.4	4. You must be able to contain surges and storm water flows. You must provide enough buffer storage capacity to make sure you can achieve this. You can define this capacity using a risk-based approach, for example, by taking into account the: A. nature of the pollutants. B. effects of downstream waste water treatment. C. sensitivity of the receiving environment.
2.4.5	5. You can only discharge waste water from this buffer storage after you have taken appropriate measures, for example, to control, treat or reuse the water.
2.4.15	15. You must isolate drainage systems from flammable waste storage areas to prevent fire spreading along the drainage system by solvents or other flammable hydrocarbons.
2.4.18	18. You must assess areas of the site where explosive atmospheres could occur and, where appropriate, classify them into hazardous zones in accordance with the Dangerous Substances and Explosive Atmospheres Regulations. Plant and equipment used in these zones must be ATEX compliant.
2.4.19	19. You must maintain plant control in an emergency – use one or a combination of the following measures: A. alarms. B. Process trips and interlocks. C. automatic systems based on microprocessor control and valve control. D. tank level readings such as ultrasonic gauges, high level warnings, process interlocks and process parameters.
2.4.21	21. You must: C. maintain an inventory of substances, which are present (or likely to be) and which could have environmental consequences if they escape – many apparently innocuous substances can damage the environment if they escape.



<b>Waste Acceptance Appropriate Measures</b>	
<b>Lakeside MRF Ltd have a comprehensive EMS that complies with all the requirements of the Waste Acceptance appropriate measures guidance with the exception of those items mentioned below:</b> (NB Where the item includes multiple criteria, we have listed only the criteria that is not complied with)	
<b>The below appropriate measures are considered to be not applicable:</b>	
3.1.6.1	<p>6.1 You also may not need a representative sample if the waste is laboratory smalls in containers of less than 5 litres. Laboratory smalls generally contain pure chemical elements and compounds from laboratories or arise when laboratory stores are cleared. When drums are used for laboratory smalls, a list of the contents must be stored within the drum below the lid, or attached to the drum. Similarly for other types of packages containing laboratory smalls, a list of contents is appropriately stored within (or attached to) the packaging. Each packed drum (or other package) is then labelled with the hazard for carriage, for example under the International Carriage of Dangerous Goods by Road (ADR) treaty.</p> <p>You should provide packaging guidance to your customer or their intermediary if the person packing the laboratory smalls does not work for you.</p>
3.1.6.2	<p>6.2 You also may not need a representative sample of waste oil for treatment. Pre acceptance sampling is not critical for a waste oil treatment plant, but it would be required if the waste will be treated at a mineral oil refinery. Typically waste oil comes from a large number of small volume sources, such as garages, but its composition is essentially fixed. Waste oil is any mineral-based or synthetic lubrication, or industrial oil which has become unfit for its original use. Waste oil includes:</p> <ul style="list-style-type: none"> <li>A. used combustion engine oils.</li> <li>B. gearbox oils.</li> <li>C. mineral lubricating oils.</li> <li>D. oils for turbines.</li> <li>E. hydraulic oils.</li> <li>F. Waste oil contaminated with more than 50 ppm of polychlorinated biphenyls (PCBs) is not included as a waste oil.</li> </ul>
3.1.6.3	<p>6.3 You should obtain a representative sample of the following types of waste oil, from:</p> <ul style="list-style-type: none"> <li>A. industrial sites that do not normally produce waste oil</li> <li>B. other sources where chemicals and potential contaminants may be handled, for example from chemical manufacturing.</li> </ul> <p>You should advise your customers that they must avoid contaminating waste oil. This is because during treatment low flashpoint solvents or petrol will cause handling difficulties, increase volatile organic compound (VOC) emissions and increase the risk of accidents.</p> <p>Contamination with PCBs can transfer those PCBs either to the:</p> <ul style="list-style-type: none"> <li>C. product (which may cause dioxin formation if used in a subsequent combustion process)</li> <li>D. tank bottom oil sludges.</li> <li>E. effluent.</li> </ul> <p>If you suspect that waste oil has become contaminated, for example by solvents, petrol or PCBs, you must identify the contamination.</p>
3.2.19	<p>19. Where containers hold laboratory smalls, you must open each container held in reception within one working day of receipt to check that the contents remain undamaged and that the inventory is as expected. All of the contents in each drum must be compatible. Once checked the container can be moved to the appropriate storage area. Laboratory smalls that need to be sorted must be moved to a dedicated repackaging area and repackaged immediately.</p>
3.2.27	<p>You must obtain a representative sample and analyse waste oil, from:</p> <ul style="list-style-type: none"> <li>K. industrial sites that do not normally produce waste oil.</li> <li>L. other sources where chemicals and potential contaminants may be handled, for example from chemical manufacturing</li> </ul> <p>For other waste oil you must obtain a representative sample of the waste but you do not have to analyse it unless a problem is found at the treatment plant.</p>
Reason:	The waste mentioned above is not accepted at the Site.
<b>The below appropriate measures are not currently complied with but will be added to the EMS:</b>	



3.1.2	<p>2. When you receive a customer query, and before the waste arrives at your facility, you must obtain the following in writing or in an electronic form:</p> <p>A. details of the waste producer including their organisation name, address and contact details</p> <p>B. the source of the waste (the producer's business and the specific process that has created the waste)</p> <p>C. where the holder of the waste is not the producer, details of the waste holder including their organisation name, address and contact details</p> <p>D. information on the nature and variability of the waste production process and the waste</p> <p>You must also obtain (in writing or electronic form) details about the waste including:</p> <p>E. a description.</p> <p>F. the List of Waste code (European Waste Classification (EWC) code)</p> <p>G. its physical form.</p> <p>H. its composition (based on safety data sheets, where appropriate, or representative samples and robust laboratory analysis) any hazardous properties.</p> <p>I. any persistent organic pollutants (POPs) present.</p> <p>J. the potential for self-heating, self-reactivity or reactivity to moisture or air.</p> <p>K. any odour.</p> <p>L. its age, that is when it first became waste.</p> <p>M. the type of packaging.</p> <p>N. an estimate of the quantity you expect to receive in each load and in a year.</p> <p>You must also obtain confirmation that the waste does not contain a radioactive source. If there is a risk of radioactive contamination you must obtain confirmation that the waste is not radioactive, unless your facility is permitted to accept such waste.</p>
3.1.4	<p>4. You can verify the pre-acceptance information by contacting or visiting the producer. Dealing with staff directly involved in waste production will help to fully characterise a waste.</p>
3.1.6.4	<p>6.4 If you do not take a pre-acceptance sample of any hazardous waste you must record the reason.</p>
3.1.6.5	<p>6.5 If the customer has a number of containers holding the same waste, you can apply 'the square root of (N) + 1' rule to sampling those containers. Producing a composite sample of this waste may be appropriate. If the waste is variable you will need a sample from each container.</p>
3.1.7	<p>7. After fully characterising a waste, you must technically assess the waste's suitability for treatment or storage to make sure you can meet permit conditions. You must also do this to meet any Control of Major Accident Hazards (COMAH) requirements, because wastes, raw materials and end-of-waste materials all contribute to COMAH limits. You must make sure that the waste complies with the site's treatment capabilities. In the case of water based liquid waste, you may perform laboratory scale tests to predict the treatment's performance, for example on breaking of emulsion or biodegradability.</p>
3.1.8	<p>8. You can use material flow analysis to help identify the flow and fate of the components in the waste. This analysis can be helpful in choosing the most appropriate forms of treatment for the waste, either directly at the site or at any subsequent treatment site.</p>
3.1.9	<p>9. You must keep pre-acceptance records for at least 3 years (in a computerised waste tracking system) following receipt of the waste. If an enquiry from a waste producer does not lead to the receipt of waste, you do not need to keep records.</p>
3.1.12	<p>12. You must keep the roles and responsibilities of sales staff and technical staff separate. If sales staff are involved in waste enquiries then technical staff must do a final technical check before approval. You must keep this final technical check independent of commercial considerations, to make sure you:</p> <p>A. only accept wastes that are suitable for the site.</p> <p>B. avoid accumulating waste.</p> <p>C. have enough storage and treatment capacity.</p>
3.1.15	<p>15. If you suspect the analysis methods applied to a liquid sample will not extract and quantify the compounds present in any solid particles or in any separate phases, separate the sample into 2 fractions by a suitable method. For example, this could be by filtration, centrifugation or decantation. Then you can determine the mass of each fraction, and perform a comprehensive analysis of the separated liquid fraction and solid fraction, or of each phase.</p>



3.1.17	17. When multiple immiscible phases or fractions are present in a waste, you can perform the analysis on each phase and combine them to provide the final result.
3.1.18	18. Analyses must be carried out by laboratories that have robust quality assurance procedures and use recognised test methods. The EN ISO 17025 accreditation represents best practice.
3.2.2	2. Your procedures should follow a risk-based approach, considering: C. potential risks to process safety, occupational safety and the environment (for example, from odour and other emissions) D. potential for self-heating, self-reactivity or reactivity to moisture or air. E. knowledge about the previous waste holder(s)
3.2.3	3. Other than in an emergency (for example, taking waste from an emergency incident clean-up), you must only receive pre-booked wastes onto site that have been adequately pre-accepted and are consistent with the pre-acceptance information.
3.2.4	4. All relevant storage areas (quarantine, reception and general) and treatment processes in your facility must have physical capacity for the waste you receive. You must not receive wastes if this capacity is not available. The amount of waste you receive must also comply with storage limits in your permit and the limits set under COMAH.
3.2.11	11. You must minimise the manual handling of waste. You should use mechanical unloading technologies where it is possible, safe and practicable to do so.
3.2.14	14. After you have completed the initial visual inspection and confirmatory checks, you must offload waste containers into a dedicated reception area to await detailed checks or sampling. Wastes that do not require further checking can go directly into the appropriate storage area. You must not unload wastes if you do not have enough space.
3.2.15	15. All waste containers must be fit for purpose, and, where appropriate, be: A. in sound condition. B. undamaged. C. not corroded, if metal. D. have well-fitting lids. E. suitable for the contents. F. with caps, valves and bungs in place and secure.  You must risk assess containers, particularly those made of plastic, if they have exceeded the manufacturer's use by date.  You must quarantine non-conforming containers and deal with them immediately and appropriately. You must record all non-conformances.
3.2.17	17. You must move non-compliant containers to a dedicated quarantine area unless you can safely store the waste in a general storage area with other compatible wastes whilst you investigate the non-conformance. You must label non-compliant containers to identify that they are quarantined. You must record the non-conformance and where the waste is stored. If you use a dedicated quarantine area, you must segregate or isolate incompatible wastes. You must contain and abate wastes which are quarantined due to odour.
3.2.18	18. Quarantine storage must be for a maximum of 5 working days. You must have written procedures for dealing with wastes you hold in quarantine, and a maximum storage volume. For some limited and specific cases (for example the detection of radioactivity), you can extend quarantine storage time if the Environment Agency agrees.
3.2.21	21. If waste containers are received shrink-wrapped on pallets, or you shrink-wrap containers, you can label the shrink wrap with all the relevant information. If a shrink wrapped load is split, you must make sure you mark or label each individual container with all the relevant information.
3.2.22	22. Where bar code systems are used for labelling, the hazardous property of the waste and the date of receipt of the container must be directly visible.
3.2.23	23. You should, wherever possible, keep wastes segregated in reception, to minimise the risk of incompatible materials reacting together.



3.2.24	<p>24. Bulk loads (liquid or solid) can only be offloaded after they have been fully verified as compliant.</p> <p>You must not accept a non-compliant bulk load for interim storage except in an emergency. Verification testing should include:</p> <p>A. checking consistency with the pre-acceptance information          B. compatibility with the receiving vessel contents          C. where appropriate, checking treatability by using laboratory scale simulation</p>
3.2.25	<p>25. Deliveries in a tanker must be accompanied by a 'wash out' certificate or a declaration of the previous load so that contamination by this route can be checked.</p>
3.2.27	<p>27. You must representatively sample all wastes, bulk or containerised (including from every container) at the acceptance stage, and carry out verification and compliance testing. You must not just rely on the written information supplied. The requirement to sample does not apply to some wastes, for example:</p> <p>A. pure product chemicals.          B. asbestos.          C. contaminated clothing, packaging or rags.          D. 'articles'.          E. laboratory smalls.          F. packaged cosmetics and pharmaceuticals.          G. solid non-hazardous waste (except for mirror entries when the waste composition is unknown)          H. contaminated wood and roofing material.          I. waste received directly from a householder.          J. green wastes and food wastes.</p> <p>Where a sample is not required, you must still visually check the waste is as expected and that no contrary materials are present. You must record the reason why you did not sample the waste in your computerised waste tracking system. You must empty and repack containers of contaminated clothing, packaging or rags to check for items that should not be there.</p>
3.2.29	<p>29. You must take a sample from every container. You can make a composite sample if each of the containers making up the composite holds the same waste and the waste is known not to be variable. You must obtain a representative sample by taking a core sample down to the base of the container. You must make sure you replace lids, bungs and valves immediately after sampling.</p>
3.2.30	<p>30. On-site sampling must take place under the supervision of the site's qualified staff. Where a driver arrives at the site with a sample taken elsewhere, the sample:</p> <p>A. must be verified as representative, reliable and obtained by a person technically competent to take it.          B. is only acceptable if it was taken for specific health or safety purposes.</p>
3.2.34	<p>34. You should keep acceptance samples on site for at least 2 working days after you have:</p> <p>A. treated a waste and removed its treatment residues from the facility.          B. transferred a waste from your site.</p> <p>Where you are transferring waste oil from your site you must keep acceptance samples for at least 2 working days after the waste has been treated off site. You must analyse the waste oil sample if a problem is found at the off-site treatment plant. You only need to keep samples that you did not analyse at acceptance.</p>
<p><b>The below appropriate measures are not currently complied with and we propose they are included as an improvement condition:</b></p>	



3.1.3	<p>3. You must consider whether specific wastes, from among those you are permitted to receive, have properties that can pose unacceptable risks to the site or process, for example due to:</p> <ul style="list-style-type: none"> <li>A. a risk of explosion (for example, if ammunition or aerosol canisters are present, or mixing processes that could lead to explosion)</li> <li>B. corrosion caused by strong acids.</li> <li>C. a risk of uncontrolled reactions (for example, if peroxides or strong oxidants are present, or polymerising components such as certain isocyanates)</li> <li>D. a risk of the evolution of gases (for example if cyanides, sulphides or dissolved gas are present)</li> </ul> <p>You should establish a list of such wastes.</p>
3.1.5	<p>5. You must obtain and analyse a representative sample of a waste if:</p> <ul style="list-style-type: none"> <li>A. the chemical composition or variability of the waste is unclear from the information supplied by the customer</li> <li>B. there are doubts about whether the sample analysed is representative of the waste</li> <li>C. you will treat the waste at your facility (this allows you to carry out tests to determine if the planned treatment will be safe and effective)</li> </ul> <p>Where you rely on a customer sample you must record that you have done this and the reason why the customer sample is acceptable.</p>
3.1.6	<p>6. You may not need a representative sample where, for example, the waste is:</p> <ul style="list-style-type: none"> <li>A. asbestos</li> <li>B. a pure product chemical or aerosol where the chemical composition and hazardous properties are available in a REACH compliant safety data sheet</li> <li>C. packaged cosmetics and pharmaceuticals</li> <li>D. contaminated clothing, packaging or rags</li> <li>E. an 'article', for example batteries, lighting tubes, waste electrical or electronic equipment, end-of-life vehicles or parts of vehicles, metal waste and scrap metal</li> <li>F. solid non-hazardous waste (except for mirror entries when the waste composition is unknown)</li> <li>G. contaminated wood and roofing material</li> <li>H. produced in an emergency – you must not treat or offload such wastes until you have completed a full characterisation</li> </ul>
3.1.11	<p>11. You must apply odour criteria to decide whether to accept wastes that are already releasing or have the potential to release:</p> <ul style="list-style-type: none"> <li>A. mercaptans or other VOCs</li> <li>B. low molecular weight amines</li> <li>C. acrylates</li> <li>D. other similarly highly odorous materials</li> </ul> <p>These substances are only suitable for acceptance under special handling requirements.</p>
3.2.5	<p>5. You must visually check wastes or their packaging and verify them against pre-acceptance information and transfer documentation before you accept them on site. The extent of the initial visual check is determined by the waste type and how it is packaged.</p>
3.2.8	<p>8. You must weigh each load of waste on arrival to confirm the quantities against the accompanying paperwork, unless alternative reliable systems are available (for example, based upon density and volume). You must record the weight in the computerised waste tracking system.</p>
3.2.10	<p>10. If there is a known risk of radioactive contamination, you must check the waste to determine that it does not include radioactive material, unless you are permitted to accept these materials.</p>
3.2.13	<p>13. The designated sampling point or reception area must be close to the laboratory or checking area and needs to be visible.</p>
3.2.16	<p>16. You must check, and where appropriate sample and analyse, the contents of all containers in the reception area within one working day of receipt. You must then transfer compliant containers to the relevant appropriate storage area on site.</p>



3.2.17	17. You must move non-compliant containers to a dedicated quarantine area unless you can safely store the waste in a general storage area with other compatible wastes whilst you investigate the non-conformance. You must label non-compliant containers to identify that they are quarantined. You must record the non-conformance and where the waste is stored. If you use a dedicated quarantine area, you must segregate or isolate incompatible wastes. You must contain and abate wastes which are quarantined due to odour.
3.2.20	20. You must make sure that all waste packages you receive are marked or labelled with: B. a unique tracking system reference
3.2.26	26. Samples from tankers should wherever possible be taken representatively by taking a core sample from the top hatch and from a suitable gantry. You must sample from each compartment where the tanker is divided into multiple compartments. If you have to take a sample from the back valve, you must take precautions to avoid spillages.
3.2.31	31. Sampling must not increase the risk of incompatible substances coming into contact with one another, for example within a sump serving the sampling point, or due to contaminated sampling equipment.
3.2.33	33. You must keep a record of the sampling regime, process and justification in your computerised waste tracking system.
3.2.36	36. You must check any relevant physico-chemical parameters using, for example, viscometry, infrared, chromatography and mass spectrometry.
3.2.37	37. Sampling procedures must be customised for: A. bulk liquid B. bulk solids C. large and small containers or vessels (the number of samples increases with the number of containers or vessels and the variability of the waste) D. laboratory smalls
3.2.38	38. You must determine and record the following information: A. the sampling regime for each load, together with your justification for selecting each option B. where and how the sample was taken C. the capacity of the sampled vessel (for samples from drums, an additional parameter would be the total number of drums) D. the number of samples and degree of consolidation E. the operating conditions at the time of sampling
3.2.41	41. Analysis of waste must be carried out by a laboratory with suitably recognised test methods. Where the waste received is hazardous, the laboratory should be on site, or routinely available at another site capable of providing test results within one working day of receipt of the waste at your site.
3.3.1	1. You must use a computerised tracking system to hold up-to-date information about the available capacity of the waste quarantine, reception, general and bulk storage areas of your facility, including treatment residues and end-of-waste product materials.
3.3.2	2. Your waste tracking system must hold all the information generated during: A. pre-acceptance. B. acceptance. C. non-conformance or rejection. D. storage. E. repackaging. F. treatment. G. removal off site. This information must be easily accessible.



3.3.3	<p>3. 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. It must include this information as a minimum:</p> <ul style="list-style-type: none"> <li>-the date the waste arrived on site</li> <li>A. the original producer's details.</li> <li>B. the previous holder.</li> <li>C. a unique reference number.</li> <li>D. waste pre-acceptance and acceptance information.</li> <li>E. any analysis results.</li> <li>F. the package type and size.</li> <li>G. the intended treatment or transfer route.</li> <li>H. accurate records of the nature and quantity of wastes held on site, including all hazards – and identifying the primary hazards.</li> <li>I. where the waste is located on site.</li> <li>J. where the waste is in the designated treatment or transfer route.</li> <li>K. the names of staff who have taken any decisions about accepting or rejecting waste streams and who have decided on recovery or disposal options.</li> <li>L. details that link each container accepted to its consignment or transfer note.</li> <li>M. details of any non-conformances and rejections.</li> </ul>
3.3.4	<p>4. The tracking system must be able to report:</p> <ul style="list-style-type: none"> <li>A. the total quantity of waste present on site at any one time</li> <li>B. a breakdown by type of the waste quantities you are storing pending treatment or transfer</li> <li>C. a breakdown of the waste quantities by hazardous property</li> <li>D. an indication of where a batch or consignment of waste is located on a site plan</li> <li>E. the quantity of waste on site compared with the limits authorised by your permit</li> <li>F. the length of time the waste has been on site</li> <li>G. the quantity of end-of-waste product materials on site at any one time, where applicable.</li> </ul>
3.3.5	<p>5. You must store back-up copies of computer records off site. Records must be easily accessible in an emergency.</p>
3.3.6	<p>6. You must hold acceptance records for a minimum of 2 years after you have treated the waste or removed it off site. You may have to keep some records for longer if they are required for other purposes, for example, hazardous waste consignment notes.</p>



<b>Waste Storage Appropriate Measures</b>	
<p><b>Lakeside MRF Ltd have a comprehensive EMS that complies with all the requirements of the Waste Storage appropriate measures guidance with the exception of those items mentioned below:</b> (NB Where the item includes multiple criteria, we have listed only the criteria that is not complied with)</p>	
<p><b>The below appropriate measures are considered to be not applicable:</b></p>	
4.24	24. You must stack bags and boxes of waste no more than 1m high on a pallet. You must not stack pallets more than 2 high.
4.25	25. You must stack containers specifically designed for stacking, and no more than 2.2m high on a pallet.
4.26	26. You must store all other containers on pallets. You must not stack these pallets more than 2 high, except for empty containers which can be stacked 3 high.
4.27	27. Stacked bags, boxes and containers must be stable. They must be secured with, for example, banding or shrink-wrap, if required. The packages must not extend beyond (over-hang) the sides of the pallet. Any shrink-wrap used must be clear or transparent so that you can identify waste types, damaged containers, leaks or spillages and incorrectly stacked containers. You must be careful not to damage any packages during stacking.
4.33	33. All containers that need them should have a lid or bung, and the lid or bung must be closed except when the container is being sampled, having waste added into it or having waste removed from it.
4.34	34. You must not stack skips containing waste. Skips containing hazardous waste must be enclosed when not being loaded or unloaded. You should store loose bulk hazardous wastes under cover.
Reason:	The Site does not use the above methods of storage for waste.
4.30	30. You should, where applicable and based on a recorded risk assessment, make inert the atmosphere of tanks containing organic liquid waste with a flashpoint less than 21°C. This can be done, for example, by using nitrogen gas.
Reason:	The Site does not use tanks to store waste on Site.
4.32	32. You must not stack wheeled containers on top of one another. Do not stack empty wheeled containers into one another more than 2.2m high.
Reason:	There are no containers on Site and therefore are not stacked.
4.35	35. You can use racking systems to store waste but you must consider segregation, ability to inspect, separation and fire suppression measures. Racking systems must be designed and constructed in accordance with HSG76 Warehousing and storage.
Reason:	The Site does not use a racking system.
4.41	41. Where relevant, bulk storage systems must conform to CIRIA guidance, and in particular to: A. C535 Above ground proprietary prefabricated oil storage tank systems B. C598 Chemical storage tank systems - good practice C. C736 Containment systems for the prevention of pollution
4.42	42. You must use tanks and associated equipment that are suitably designed, constructed and maintained. You must do a risk assessment to validate the design and operation of bulk storage systems. Before you use new tanks and equipment you must check they are working correctly. You must periodically examine and test that your tanks meet the standards set out in EEMUA Publication 231: The mechanical integrity of plant containing hazardous substances.
4.43	43. You should vent bulk storage tanks and silos through suitable abatement.



4.44	44. You must locate bulk storage vessels on an impermeable surface which is resistant to the material being stored. The surface must have self-contained drainage to prevent any spillage entering the storage systems or escaping off site. Impermeable surfaces must have sealed construction joints.
4.45	45. You must provide bunds for all tanks containing liquids (whether waste or otherwise) which could be harmful to the environment if spilled. Bunds must meet the CIRIA C535 or C736 standard and: A. be impermeable, stable and resistant to the stored materials. B. have no outlet (that is, no drains or taps), and drain to a blind collection point. C. have pipework routed within bunded areas with no penetration of contained surfaces. D. be designed to catch leaks from tanks or fittings. E. have a capacity calculated following the relevant CIRIA guidance. F. have regular visual inspections – you must pump out or remove any contents under manual control after you have checked for contamination. G. be fitted with a high level probe and an alarm (as appropriate) if not frequently inspected H. have tanker connection points within the bund where possible – if not possible you -must provide adequate containment for spillages or leakage. I. have programmed engineering inspections (extending to water testing if structural integrity is in doubt) J. be emptied of rainwater regularly to maintain the containment capacity.
4.46	46. You must control sludge build up and foam in tanks, for example by regularly sucking out the sludge and using anti foaming agents.
4.47	47. You should equip storage and treatment tanks with an automatic level monitoring system and an associated alarm or trip system. These systems must be sufficiently robust (for example, be able to work if sludge and foam are present) and regularly maintained. You must fit tanks with suitable overfill protection.
4.48	48. You must be able to close all connections to vessels, tanks and secondary containment via suitable valves. You must fit a valve close to the tank if you have bottom outlets and have at least 2 isolation points in case of valve failure.
4.49	49. You must direct overflow pipes to a contained drainage system (for example the relevant secondary containment) or to another vessel where suitable control measures are in place.
4.50	50. Tanks, pipework and fittings must be examined by a competent person, following a written scheme. The scope and frequency of examination must also be determined by a competent person. You must work out how often to carry out these internal examinations using a risk assessment approach. This should be based on: A. tank service B. maintenance history C. known and potential damage mechanisms and their rates of attack You should also do intermediate external examinations. You must act on the results of the examinations and do any necessary repairs to ensure the tanks remain fit for service. You must keep the results of examinations and repairs.
4.51	51. You must have systems in place to make sure that loading, unloading and storage are safe, considering any associated risks. This can include: A. having piping and instrumentation diagrams. B. using ticketing systems. C. using key locked coupling systems. D. having colour coded points, fittings and hoses. E. using specific coupling or hose sizes for certain waste transfers.
4.52	52. As a general rule, you must not use open topped tanks, containers, vessels or pits to store or treat hazardous or liquid wastes.
Reason:	There is no bulk storage on Site.
4.53	53. All pipes, hoses, connections, couplings and transfer lines must be fit for purpose and resistant to the wastes being stored. You must use a suitable pipework coding system (for example, RAL European standard colour coding).
4.54	54. Site staff must supervise loading and unloading activities, either directly or via CCTV.



4.55	55. You must make sure that transfers into and from tankers only take place after you have completed any relevant verification and compatibility testing, and then only with the approval of an appropriate chemist or manager. The approver must specify: A. which batch or load of material is to be transferred B. the receiving storage vessel C. the equipment required, including spillage control and recovery equipment D. any special provisions relevant to that batch or load including minimising odour and other fugitive emissions.
4.56	56. You must have in place systems to prevent 'tanker drive off' (a vehicle pulling away whilst still coupled).
4.57	57. You must make sure that the transfer of waste from tankers is only carried out by competent staff. You must give them enough time, so they are not under pressure to work more quickly than is deemed acceptable.
4.58	58. You must have measures in place to make sure that couplings are a correct fit. This will prevent couplings from loosening or becoming detached. You should provide, maintain and clean your own couplings and hoses to guarantee their integrity and fitness. You should also: A. make sure you take special care so that a coupling is able to withstand the maximum shut valve pressure of the transfer pump. B. maintain a sound coupling at each end of the transfer hose, even when a gravity feed system is in place, and protect the transfer hose. C. control potential leaks from coupling devices by using simple systems such as drip trays.
4.59	59. You must make sure that transfers into and from tankers only take place in bunded areas designed to contain a worst case spillage. You must have emergency storage for leaking vehicles to minimise any acute incidents caused by a seal on a tanker failing.
4.60	60. You should have systems and procedures in place to make sure that wastes due to be transferred comply with the carriage of dangerous goods when they are packaged and transported.
4.61	61. You should have systems and procedures in place to make sure that wastes due to be transferred comply with the carriage of dangerous goods when they are packaged and transported.
4.62	62. You must make a record of any spillages. You must retain spillages within the bunded areas and collect them promptly using, for example, pumps or absorbents.
4.63	63. You must make sure that tankers are not used as blending or reaction vessels as this is not their designed purpose.
4.64	64. You must take operational and design precautions when mixing or blending wastes, depending on the composition and consistency of the wastes (for example when vacuuming dusty or powdery wastes).
4.65	65. Where you use rotary-type pumps, they must be equipped with a pressure control system and safety valve.
4.66	66. You must pump sludges. Do not pour them.
4.67	67. When loading and offloading odorous, flammable or volatile liquids between bulk storage tanks and tankers, you must use vapour balance lines to transfer the displaced vapours from the receiving vessel to the vessel you are pumping from.
4.68	68. You must follow safe operating procedures designed to reduce the risk of explosion and fugitive emissions when you transfer waste from powder tankers into silos. You must use trained and competent personnel.
4.69	69. You must carry out routine maintenance to prevent failure of the plant or equipment. This may include the failure of a pump seal or the blockage of a filter pot commonly used at transfer points.



4.70	70. You must continue using the waste tracking system that began at the pre-acceptance stage for the whole time waste is kept at the site.
Reason:	No tankers are used on Site.
4.71	71. You must store aerosol canisters under cover in secure, well-ventilated containers, and within caged storage areas. You must also store them in a well-vented place that is not subject to extreme temperatures or direct sunlight. You must not store canisters in open containers to prevent the risk of them spreading fires by 'missiling' or 'ejection'.
4.72	72. You must segregate aerosol canisters from other flammable wastes and potential sources of ignition. Preferably put them in a separate building, or use a fire resistant enclosure or fire wall. You must not hold any combustible material within the storage area, other than the canister's packaging, containers and the pallets on which they stand.
4.73	73. You must provide suitable containment measures (for example drip trays) for aerosol canisters held in containers which cannot collect and hold free liquids released from the canisters. Or you should transfer them to secure containers that are able to hold free liquid.
4.74	74. During storage, lids on containers holding aerosol canisters must remain securely closed at all times when not being filled, emptied or internally inspected. When not in use, the doors or hatches of cages must remain closed and locked.
4.75	75. You must not overfill containers used to store canisters. Overfilling can result in canisters being actuated and discharging their contents, either: -under the weight of the canisters above them. -when the container lid is closed. -when containers are stacked.
4.76	76. Cages used to store aerosol canister containers must be robust, fire resistant and of an appropriate mesh size (based upon the size of the canisters being stored). This is to constrain the canisters and prevent any ejection. Where the cage is not constructed with a mesh roof, the mesh wall panels must extend into the roof space of the storage area to make sure that the structure is completely enclosed.
4.77	77. You should store aluminium canisters separately from steel canisters (especially rusting canisters). This will: -prevent thermite sparks during storage, handling and treatment -allow the different metals to be more easily recovered
Reason:	The Site does not take in aerosol canisters.
4.78	78. Sorting is the placing together of containers with other waste containers of the same type, without emptying the contents from the container. You must have a permit that specifically allows you to carry out storage activities (coded D15 or R13).
4.79	79. Repackaging is the removal of waste from a container, or into a container. This may involve bulking it with other wastes of the same type from other containers. You must have a permit that specifically allows you to carry out repackaging activities (coded D14 or R12).
4.80	80. Bulking of waste that is not regarded as repackaging includes: -discharging from a tanker to bulk storage of wastes of the same type -tank to tank transfer where both tanks contain wastes of the same type These activities are storage (coded D15 or R13).
4.81	81. You must only bulk or repackage wastes together if they are materially the same. They must not react when they are bulked and they must not change the waste's composition.
4.82	82. If a waste is mixed with other similar wastes, where the resulting mixture does not have significantly different characteristics from the mixed wastes (for example blending compatible combustible or flammable wastes as a fuel), this activity is mixing or blending (coded D13 or R12). Any other mixing that changes a waste is treatment.
4.83	83. You must have a permit that specifically allows you to mix hazardous waste with any: A. non-hazardous waste. B. hazardous waste in a different category. C. non-waste.



4.84	84. You must not mix, bulk or repackage: A. wastes which could be recovered with other wastes if this means that the waste must now be sent for disposal or a lower form of recovery. B. liquid wastes or infectious wastes with other wastes for the purpose of landfilling. C. oils where this could affect their regeneration or recycling. D. wastes containing Persistent Organic Pollutants (POPs) with another material solely to generate a mixture below the defined low POPs content. E. waste to deliberately dilute it.
4.85	85. You must transfer wastes from containers into other storage vessels using a dip pipe, not by pouring.
4.86	86. Repackaging or mixing must only take place in a dedicated area or store which has the plant and equipment needed to deal with the specific risks of that process. For example, this could include abatement or local exhaust ventilation.
4.87	87. Except for small packages with a volume less than 5 litres, or damaged containers, you must move containers using mechanical means. For example, use a forklift truck with a rotating drum handling fitting, or using pumps for liquids.
4.88	88. You must label containers of repackaged or mixed wastes so that you can identify their contents and origin through the tracking system. After repackaging, you must move the bulked materials and emptied containers to an appropriate segregated storage area.
4.89	89. You must have a risk assessment and carry out appropriate compatibility testing to make sure that bulked wastes will not react with each other, or with the container into which they are being placed.
Reason:	No repackaging or mixing takes place on Site.
4.90	90. Where possible, you should sort and segregate laboratory smalls at source so that you do not need to reopen or re-sort containers.
4.91	91. If you sort laboratory smalls for compatibility reasons you must carry this out in a dedicated area of a building, with self-contained drainage.
4.92	92. You must write and follow procedures for the segregation, sorting and repackaging of laboratory smalls.
Reason:	No laboratory smalls are accepted on to Site.
<b>The below appropriate measures are not currently complied with but will be added to the EMS:</b>	
4.1	1. You must store waste in locations that minimise the handling of waste. Waste handling must be carried out by competent staff using appropriate equipment.
4.2	2. 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 secure area of your facility to prevent unauthorised access and vandalism.
4.4.	4. You must clearly document the maximum storage capacity of your site and the designated storage areas. You must not exceed these maximum capacities. You should define capacity in terms of, for example, maximum tank or vessel capacities, tonnage and numbers of skips, pallets or containers. You must regularly monitor the quantity of stored waste on site and designated areas and check against the allowed maximum capacities.
4.5	5. You must clearly mark hazardous waste storage areas and provide signs showing the maximum quantity and hazardous properties of wastes that can be stored there.
4.7	7. Secondary and tertiary containment systems must conform to CIRIA guidance C736 Containment systems for the prevention of pollution.



4.8	<p>8. You must store containerised wastes that are sensitive to air, light, heat, moisture or extreme ambient temperatures under cover protected from such ambient conditions. Covered areas must have good ventilation. This applies to any such container:</p> <p>A. held in general storage, reception storage (pending acceptance) or quarantine.  B. being emptied, repackaged or otherwise managed.</p> <p>For example, waste held in fibre or cardboard primary or secondary packaging should be stored under cover in a dry area and not exposed to rain or moisture. It must be kept off floors to prevent damage by damp.</p>
4.12	<p>12. You must not store or hold wastes on site in vehicles or vehicle trailers unless you are receiving them or preparing them for imminent transfer (meaning that you will remove them from site within 24 hours, or 72 hours if over a weekend).</p>
4.16	<p>16. All stored containers must keep the labelling they had at acceptance. If the label is damaged or no longer legible you should replace the label with that same information.</p>
4.17	<p>17. You must handle and store containers so that the label is easily visible and continues to be legible.</p>
4.18	<p>18. You should keep solid waste dry and avoid the dilution of hazardous waste.</p>
4.19	<p>19. You must keep clean rainwater and clean cooling water separate from wastes and waste waters.</p>
4.28	<p>28. All waste containers must remain fit for purpose. You must check any containers (and pallets they may be stored on) daily and record non-conformances. Non-compliant containers and pallets must be made safe. You must immediately and appropriately manage any unsound, poorly labelled or unlabelled containers (for example, by relabelling, over drumming and transferring the container's contents). You must risk assess, approve and record the use of containers, tanks and vessels:</p> <p>A. beyond their specified design life.  B. where you use them for a purpose, or substances, other than the ones they were designed for.</p>
4.29	<p>29. You must not handle waste or its packaging in a way that might damage its integrity, unless it is appropriate to destroy a waste or its packaging, for example by shredding. You must not, for example, walk on or throw waste or waste packages.</p>
<p><b>The below appropriate measures are not currently complied with and we propose they are included as an improvement condition:</b></p>	
4.3	<p>3. Where relevant, you must conform to HSE standards and in particular to:</p> <p>A. HSG51 Storage of flammable liquids in containers  B. HSG71 Chemical warehousing: storage of packaged dangerous substances  C. HSG76 Warehousing and storage: a guide to health and safety  D. HSG140 Safe use and handling of flammable liquids  E. HSG176 Storage of flammable liquids in tanks  F. CS21 Storage and handling of organic peroxides</p>
4.9	<p>9. You must store wastes in sealed metal containers under cover if they have the potential for self-heating or self-reactivity. You must monitor the containers for heat build-up. Such wastes include rags and filter materials contaminated with metal swarf, low boiling point oils or low flash point solvents.</p>
4.10	<p>10. Wherever practicable you should store all other wastes under cover. Covered areas must have good ventilation. This applies to any such container:</p> <p>A. held in general storage, reception storage (pending acceptance) or quarantine.  B. being emptied, repackaged or otherwise managed.</p> <p>Under cover storage provides better protection for containers than open air storage and minimises the generation of contaminated water. Covered storage also:</p> <p>C. lowers temperature fluctuations that can cause pressure build up in containers  D. reduces the degradation of containers through weathering</p>



4.11	11. You must not store hazardous waste in open-topped containers. Empty open-topped containers should be kept in a building or undercover to prevent rainwater ingress.
4.13	13. You should pay particular attention to avoid the build-up of static electricity when you are storing or handling flammable wastes and materials. You should use leak detection systems and alarms (for example VOC alarms) and automatic fire suppression equipment based on a recorded risk assessment.
4.14	14. You must provide adequate bunding of all storage areas, and containment and treatment of any water run-off.
4.15	15. You must not accumulate waste. You must treat wastes, or remove them from the site, as soon as possible. Generally you should do this within one month of receipt but all wastes must be removed within 6 months of receipt. This applies even when the waste might be used as a reactant. Where a shorter time period is given in a permit condition you must comply with the permit for that waste. Where a waste is stored for longer than allowed you must inform the Environment Agency.
4.20	20. You must keep incompatible wastes segregated so that they cannot come into contact with one another. You must store flammable wastes apart from other wastes to prevent fire spreading between them and other materials. You must use sealed drainage systems to prevent leaks and spillages contaminating other wastes.
4.21	21. There must be pedestrian and vehicular access (for example, forklift) at all times to the whole storage area so that you can retrieve containers without removing others that may be blocking access – other than removing those in the same row.
4.22	22. You must store all waste containers in a way that allows easy inspection. You must maintain safe access, with a gap of at least 0.7m between rows of bulk containers or palletised wastes.
4.23	23. You must move drums and other mobile containers between different locations (or loaded for removal off site) following written procedures. You must then amend your waste tracking system to record these changes.
4.31	31. You must store asbestos waste double bagged or wrapped, in sealed, closed and locked containers. You must not store asbestos waste loose. You must not put asbestos wastes into bays or transfer it between different skips or containers. You must not use mechanical equipment, for example loading shovels, chutes and conveyors to move asbestos waste.
4.36	36. You must: A. contain wash waters within an impermeable area and either discharge them to foul sewer or dispose of them appropriately off site. B. prevent run-off into external areas or to surface water drains



<b>Waste Treatment Appropriate Measures</b>	
<b>Lakeside MRF Ltd have a comprehensive EMS that complies with all the requirements of the Waste Treatment appropriate measures guidance with the exception of those items mentioned below:</b> (NB Where the item includes multiple criteria, we have listed only the criteria that is not complied with)	
<b>The below appropriate measure is considered to be not applicable:</b>	
5.1.7	7. For each new reaction, you must assess the proposed mixes of wastes and reagents before treatment by carrying out a scale laboratory test mix of the wastes and reagents to be used. You must predetermine a batch 'recipe' for all reactions and mixes of wastes. You must also take into account the potential scale up effects, for example, the increased: A. heat of reaction with increased reaction mass relative to the reactor volume B. residence time within the reactor and modified reaction properties Your treatment must comply with HSG143 Designing and operating safe chemical reaction processes.
5.1.11	11. You must monitor the reaction to make sure it is under control and proceeding towards the anticipated result. Vessels used for treatment must be equipped appropriately, for example with high level, pH and temperature monitors. These monitors must be automatic and continuous, linked to a clear display in the control room or laboratory, and have an audible alarm. Your risk assessment may require you to link process monitors to cut-off devices.
Reason:	Waste is not treated on Site in a way that would cause these reactions.
5.2.1	1. Any aerosol treatment process must be fit for purpose. It must be specifically designed to: A. treat canisters and recover their materials and residues B. manage potentially flammable substances C. prevent explosive atmospheres
5.2.2	2. You must design and operate the treatment process (for example, the waste feed rate, duration of treatment cycle and gas or liquid extraction) so that the canisters' residual contents are fully discharged and removed safely and efficiently.
5.2.3	3. You must locate the treatment plant in a designated covered area or ventilated building. This must: A. have impermeable surfaces and sealed drainage. B. be located away from stored combustible materials, other sources of ignition and sensitive receptors.  You must design the treatment area to avoid the potential build-up of flammable gases that are heavier than air, for example in sumps or similar sunken areas.
5.2.4	4. The treatment process must be: A. designed by a competent person. B. carried out in an enclosed and sealed system, fitted with an appropriate gas extraction system. C. provided with a means to contain or control an explosion. D. strong enough to contain an explosion (typically up to 10 bar over-pressure), or have explosion relief directed to a safe space or explosion suppression fitted.  Design, operation and explosion relief provisions must satisfy the requirements of relevant health and safety legislation. The gas extraction system must be interlocked with plant operation, so that the plant cannot operate unless the system is working.
5.2.5	5. You must carry out the aerosol treatment process, including tipping and loading, within a controlled inert atmosphere. For example, you could use gas extraction and nitrogen gas injection to displace air from the plant and purge it before and after a treatment cycle. If the inerting system fails or high oxygen levels are detected, the treatment should stop automatically. Similarly, if you use ventilation to prevent an explosive atmosphere forming, the equipment should automatically stop operating when the lower explosion limit is approached.
5.2.6	6. You must make sure you have checked and sorted all canisters before feeding them into the treatment process. This makes sure you exclude incompatible or untreatable wastes (for example, expanding foams).



5.2.7	7. You should process batches of aluminium and steel cans separately to make it easier to recycle the metals recovered from the treatment process and prevent thermite reactions.
5.2.8	8. You must keep waste sorting and storage distinct and separate from the treatment process.
5.2.9	9. For safety, and to prevent wastes accumulating on site, you must make sure you identify available and reliable recovery or disposal routes. You should have contracts in place to take: A. the residues or materials recovered from the treatment process. B. any canisters you have accepted but cannot treat on site.
5.2.10	10. You must make sure that as a minimum, all LPG piping systems comply with UKLPG Code of Practice 22. They must be securely sealed and tested and have a procedure in place for regular inspection.
5.2.11	11. Containers and tanks holding liquids collected from the treatment process should be: A. compatible with the materials held. B. fully earthed. C. UN tested. D. integrally sound. E. designed and constructed to prevent the release of fugitive emissions to air (including odour) and ground, whilst allowing for emergency venting where necessary.
5.2.12	12. You should store containers that cannot be enclosed (for example skips containing recovered metal which are open to allow ventilation and drying) in well-ventilated, covered storage areas. This will prevent: A. rainwater collecting (and becoming contaminated) B. the materials held corroding or deteriorating.
5.2.13	13. You should not collect or hold flammable liquids in plastic drums or non-conductive plastic IBCs. Containers used to collect and hold flammable liquids from the treatment process should preferably be constructed from steel, or at least anti-static plastic. They should be designed so that they can be sealed for handling and storing. You must only use anti-static plastic containers to collect and hold flammable liquids if you are holding them separate from other wastes, within a self-contained bund.
5.2.14	14. You must collect, and allow to dry, any residues that remain on the recovered metals before they are stored or sent for recycling.
Reason:	No aerosols accepted on to Site.
<b>The below appropriate measures are not currently complied with but will be added to the EMS:</b>	
5.1.5	5. You must not proceed with the treatment if your risk assessment or material flow analysis indicates that losses from a process will cause: A. the breach of an environmental quality standard. B. the breach of a benchmark. C. a significant environmental impact.
<b>The below appropriate measures are not currently complied with and we propose they are included as an improvement condition:</b>	



5.1.2	<p>2. You must have up-to-date written details of your treatment activities, and the abatement and control equipment you are using. This should include information about the characteristics of the waste you will treat and the waste treatment processes, including:</p> <ul style="list-style-type: none"> <li>A. simplified process flowsheets that show the origin of any emissions</li> <li>D. details of chemical reactions and their reaction kinetics and energy balance</li> <li>E. details of physical treatment processes for example thermal desorption, distillation, phase separation, shredding, filtration, compaction, centrifuging, heating, cooling or washing</li> <li>F. details of biological treatment processes</li> <li>G. details of any effluent treatment</li> <li>H. a description of any flocculants or coagulants used</li> <li>I. an equipment inventory, detailing plant type and design parameters, for example, time, temperature, pressure</li> <li>K. the control system philosophy and how the control system incorporates environmental monitoring information</li> <li>L. process flow diagrams (schematics)</li> <li>M. venting and emergency relief provisions</li> <li>O. process instrumentation diagrams</li> </ul>
5.1.4	<p>4. You should use material flow analysis for relevant contaminants in the waste to help identify their flow and fate. You should use the analysis to determine the appropriate treatment for the waste either directly at the site or at any subsequent treatment site. Material flow analysis considers the contaminant quantity in the:</p> <ul style="list-style-type: none"> <li>A. waste input</li> <li>B. different waste treatment outputs</li> <li>C. waste treatment emissions</li> </ul> <p>You should use the analysis and your knowledge of the fate of the contaminants to make sure you correctly treat and either destroy or remove them.</p> <p>The use of material flow analysis is risk-based, considering:</p> <ul style="list-style-type: none"> <li>D. the hazardous properties of the waste</li> <li>E. the risks posed by the waste in terms of process safety</li> <li>F. occupational safety and environmental impact</li> <li>G. knowledge of the previous waste holder(s)</li> </ul> <p>A treatment process may destroy certain substances in the waste. It could also put substances into the air, water or ground, or have residues which are sent for disposal. The weight of these outputs should be minimised. The treatment may produce residues for recovery or reuse and the weight of these substances should be maximised.</p>
5.1.8	<p>8. The reactor vessel and plant must be specifically designed, commissioned and operated to be fit for purpose. The designs need to consider chemical process hazards and a hazard assessment of the chemical reactions. They also need to consider prevention and protective measures and process management, such as:</p> <ul style="list-style-type: none"> <li>C. appropriate process control measures</li> <li>D. monitoring systems, alarms and interlocks</li> </ul>
5.1.10	<p>10. Where an emission is expected, all treatment or reactor vessels must be enclosed. Only vent them to the atmosphere via an appropriate scrubbing and abatement system (subject to explosion relief).</p>
5.3.1	<p>15. You must record in the computerised waste tracking system:</p> <ul style="list-style-type: none"> <li>A. that a waste has been treated</li> <li>B. what the treatment residues are and their weight.</li> <li>C. what end-of-waste products have been made and their weight.</li> </ul>



<b>Emissions Control Appropriate Measures</b>	
<b>Lakeside MRF Ltd have a comprehensive EMS that complies with all the requirements of the Emissions Control appropriate measures guidance with the exception of those items mentioned below:</b>	
(NB Where the item includes multiple criteria, we have listed only the criteria that is not complied with)	
<b>The below appropriate measures are considered to be not applicable:</b>	
6.1.1	1. You must contain storage tanks, silos and waste treatment plant (including shredders) to make sure you collect, extract and direct all process emissions to an appropriate abatement system for treatment before release.
6.1.2	2. You must identify the main chemical constituents of the site's point source emissions as part of the site's inventory of emissions to air.
6.1.3	3. You must assess the fate and impact of the substances emitted to air, following the Environment Agency's risk assessment methodology.
6.1.4	4. To reduce point source emissions to air (for example, dust, volatile organic compounds and odour) from the treatment of waste, you must use an appropriate combination of abatement techniques, including one or more of the following systems: A. adsorption (for example, activated carbon) B. biofiltration C. wet scrubbing D. fabric filters E. high efficiency particulate (HEPA) filtration F. condensation and cryogenic condensation G. cyclonic separation H. electrostatic precipitation I. thermal oxidation
6.1.5	5. You must assess and design vent and stack locations and heights to make sure dispersion capability is adequate. Where monitoring is required, including for odour, you must install suitable monitoring points.
6.1.6	6. Your procedures must make sure you correctly install, operate, monitor and maintain abatement equipment. For example, this includes monitoring and maintaining: A. appropriate flow and chemical concentration of scrubber liquor B. the handling and disposal or regeneration of spent scrubber or filter medium
6.1.7	7. You should design and operate abatement systems to minimise water vapour plumes.
Reason:	There are no point source emissions to air.
6.2.16	16. You must store contaminated waters that have potential for odours in covered or enclosed tanks or containers vented through suitable abatement.
Reason:	There are no contaminated waters expected at the Site.
<b>The below appropriate measures are not currently complied with but will be added to the EMS:</b>	
6.2.4	4. 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 of these wastes you must: B. prioritise their treatment or transfer.
6.2.8	8. Your inspection, maintenance and cleaning schedules must make sure that tanks and plant are regularly cleaned to avoid large-scale decontamination activities.
6.2.13	13. You must have procedures to minimise the amount of time odorous wastes spend in your storage and handling systems (for example, pipes, conveyors, hoppers, tanks). In particular, you must have provisions to manage waste during periods of peak volume.
6.5.9	9. You must take measures to prevent emissions from washing and cleaning activities, including: A. directing liquid effluent and wash waters to foul sewer or collecting them in a sealed system for off-site disposal – you must not discharge them to surface or storm drains. B. where possible, using biodegradable and non-corrosive washing and cleaning products. C. 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. D. preparing cleaning solutions in contained areas of the site and never in areas that drain to the surface water system.



<b>The below appropriate measures are not currently complied with and we propose they are included as an improvement condition:</b>	
6.2.3	3. To make sure fugitive emissions are collected and directed to appropriate abatement, your treatment plant must use high integrity components (for example, seals or gaskets). Your treatment plant must be fully enclosed, with air extraction systems located close to emission sources where possible.
6.2.6	6. You must set up a leak detection and repair programme and use it to promptly identify and mitigate any fugitive emissions from treatment plant and associated infrastructure (for example, pipework, conveyors, tanks).
6.2.7	7. You must regularly inspect and clean all waste storage and treatment areas, equipment (including conveyor belts) and containers. You must have an appropriate regular maintenance programme covering all buildings, plant and equipment. This must also include protective equipment such as air ventilation and extraction systems, curtains and fast-action doors used to prevent and contain fugitive releases.
6.2.10	10. If you wash containers or tanks, you must design and operate the washing process and associated equipment in a way that prevents fugitive emissions to air. For example, you could do this activity in a contained or enclosed system.
6.2.11	11. You must fully enclose and contain pre- and post-treatment shredder plant to prevent emissions. You must design and operate the shredder plant using appropriate process interlocks. The plant should not operate unless it is enclosed and contained, for example, only working when the loading door on the hopper has been closed or sealed. Dust and microbial emissions from the shredder plant must be contained and extracted to an appropriate abatement system, for example HEPA air filtration.
6.2.15	15. You must monitor and maintain odour abatement systems to ensure optimum performance. For example, you should make sure that scrubber liquors are maintained at the correct pH and replenished or replaced at an appropriate frequency.
6.4.2	2. You must assess the fate and impact of the substances emitted to water and sewer, following the Environment Agency's risk assessment guidance.
6.5.2	2. You must have these in all operational areas of the facility: B. spill containment kerbs
6.5.3	3. You must have measures in place to prevent overflows and failures from tanks and vessels, including where relevant: A. overflow detectors and alarms B. directing over-flow pipes to a contained drainage system C. locating tanks and packaged liquids in suitable secondary containment (bunds) D. providing isolation mechanisms (for example, closing valves) for tanks, vessels and secondary containment
6.5.4	4. You must collect and treat separately each water stream generated at the facility, for example, surface run-off water or process water. Separation must be based on pollutant content and treatment required. In particular you must make sure you segregate uncontaminated water streams from those that require treatment.
6.5.7	7. You should provide appropriate buffer storage capacity at your facility to store waste waters, taking into account: A. potential abnormal operating scenarios and incidents. B. the nature of any polluting substances and their impact on the downstream waste water treatment plant and receiving environment.
6.5.8	8. You must have appropriate measures in place to monitor, treat and reuse water held in the buffer storage before discharging.
6.5.16	16. Container washing equipment must be contained and located in a designated area of the facility that has self-contained drainage. The equipment must be designed to collect and contain all wash waters, including any spray. Trained staff must operate, inspect and maintain it regularly.



6.5.17	<p>17. For sub-surface structures, you must:</p> <ul style="list-style-type: none"><li>C. engineer systems to minimise leakages from pipes and make sure they are detected quickly if they do occur, particularly where hazardous substances are involved.</li><li>D. provide secondary containment or leakage detection for sub-surface pipework, sumps and storage vessels.</li><li>E. establish an inspection and maintenance programme for all sub-surface structures, for example, pressure tests, leak tests, material thickness checks or CCTV.</li></ul>
6.5.18	<p>18. For surfacing, you must design appropriate surfacing and containment or drainage facilities for all operational areas, taking into account:</p> <ul style="list-style-type: none"><li>A. collection capacities.</li><li>B. surface thicknesses.</li><li>C. strength and reinforcement.</li><li>G. resistance to chemical attack.</li></ul>



<b>Emissions Monitoring Appropriate Measures</b>	
<b>Lakeside MRF Ltd have a comprehensive EMS that complies with all the requirements of the Emissions Monitoring appropriate measures guidance with the exception of those items mentioned below:</b> (NB Where the item includes multiple criteria, we have listed only the criteria that is not complied with)	
<b>The below appropriate measure is considered to be not applicable:</b>	
7.1.1	<p>1. Your facility's emissions inventory must include information about the relevant characteristics of point source emissions to air, such as the:</p> <p>A. average values and variability of flow and temperature.</p> <p>B. average concentration and load values of relevant substances and their variability.</p> <p>C. flammability, lower and higher explosive limits and reactivity.</p> <p>D. presence of other substances that may affect the waste gas treatment system or plant safety – for example, oxygen, nitrogen, water vapour, dust.</p>
Reason:	No point source emissions to air.
<b>The below appropriate measures are not currently complied with and we propose they are included as an improvement condition:</b>	
7.2.1	<p>1. Your facility's emissions inventory must include information about the relevant characteristics of point source emissions to water or sewer, such as:</p> <p>A. average values and variability of flow, pH, temperature, and conductivity.</p> <p>B. average concentration and load values of relevant substances and their variability – for example, COD (chemical oxygen demand) and TOC (total organic carbon), nitrogen species, phosphorus, metals, priority substances or micropollutants.</p> <p>C. data on bio-eliminability – for example, BOD (biochemical oxygen demand), BOD to COD ratio, Zahn-Wellens test, biological inhibition potential, for example, inhibition of activated sludge.</p>
7.2.2	<p>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 key locations. For example, these could either be at the:</p> <p>A. inlet or outlet (or both) of the pre-treatment.</p> <p>B. inlet to the final treatment.</p> <p>C. point where the emission leaves the facility boundary.</p>



<b>Process Efficiency Appropriate Measures</b>	
<b>Lakeside MRF Ltd have a comprehensive EMS that complies with all the requirements of the Process Efficiency appropriate measures guidance with the exception of those items mentioned below:</b> (NB Where the item includes multiple criteria, we have listed only the criteria that is not complied with)	
<b>The below appropriate measures are considered to be not applicable:</b>	
8.1.1	1. You must create and implement an energy efficiency plan at your facility. This must: A. define and calculate the specific energy consumption of the activity (or activities) you do and waste stream(s) you treat. B. set annual key performance indicators – for example, specific energy consumption (expressed in kWh/tonne of waste processed) C. plan periodic improvement targets and related actions.
8.1.2	2. You must regularly review and update your energy efficiency plan as part of your facility's management system.
8.1.3	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.
8.1.4	4. You must regularly review and update your energy balance record as part of your facility's management system, alongside the energy efficiency plan.
8.1.5	5. You must have operating, maintenance and housekeeping measures in place in relevant areas, for example for: A. air conditioning, process refrigeration and cooling systems (leaks, seals, temperature control, evaporator or condenser maintenance) B. the operation of motors and drives. C. compressed gas systems (leaks, procedures for use) D. steam distribution systems (leaks, traps, insulation) E. space heating and hot water systems. F. lubrication to avoid high friction losses. G. boiler operation and maintenance, for example, optimising excess air. H. other maintenance relevant to the activities within the facility.
8.1.6	6. You must have measures in place to avoid gross energy inefficiencies. These should include, for example: A. insulation. B. containment methods (such as seals and self-closing doors) C. avoiding unnecessary discharge of heated water or air (for example, by fitting timers and sensors)
8.1.7	7. You should implement additional energy efficiency measures at the facility as appropriate, following our guidance.
8.2.1	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.
8.2.2	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.
8.2.3	3. You must justify the continued use of any substance for which there is a less hazardous alternative.
8.2.4	4. You must have quality assurance procedures in place to control the content of raw materials.
8.3.1	1. You must make sure you optimise water consumption to: A. reduce the volume of waste water you generate. B. prevent or, where that is not practicable, reduce emissions to soil and water.



8.3.2	<p>2. Measures you must take include:</p> <p>A. implementing a water saving plan (involving establishing water efficiency objectives, flow diagrams and water mass balances)</p> <p>B. optimising the use of wash waters (for example, dry cleaning instead of hosing down and using trigger controls on all washing equipment)</p> <p>C. recirculating and reusing water streams within the plant or facility, if necessary after treatment</p> <p>D. reducing the use of water for vacuum generation (for example, using liquid ring pumps with high boiling point liquids), where relevant</p>
8.3.3	3. You must review water use (a water efficiency audit) at least every 4 years.
8.3.4	<p>4. You must also:</p> <p>A. produce flow diagrams and water mass balances for your activities.</p> <p>B. establish water efficiency objectives and identify constraints on reducing water use beyond a certain level (usually this will be site specific)</p> <p>C. identify the opportunities for maximising reuse and minimising use of water.</p> <p>D. have a timetabled improvement plan for implementing additional water reduction measures.</p>
8.3.5	<p>5. To reduce water use and associated emissions to water, you should apply these general principles in sequence:</p> <p>A. use water efficient techniques at source where possible.</p> <p>B. reuse water within the process, by treating it first if necessary – if not practicable, use it in another part of the process or facility that has a lower water quality requirement.</p> <p>C. 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.</p>
8.3.6	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.
8.3.7	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.
8.3.8	<p>8. You must minimise the volume of water you use for cleaning and washing down by:</p> <p>A. vacuuming, scraping or mopping in preference to hosing down</p> <p>B. reusing wash water (or recycled water) where practicable</p> <p>C. using trigger controls on all hoses, hand lances and washing equipment</p>
8.3.9	9. You must directly measure fresh water consumption and record it regularly at every significant usage point, ideally on a daily basis.
Reason:	The Site does not carry out any installation activities.
<b>The below appropriate measures are not currently complied with and we propose they are included as an improvement condition:</b>	
8.4.2	2. Where you must dispose of waste, you must do a detailed assessment to identify the best environmental options for waste disposal.