Lakeside MRF Ltd

Inert and Non-Hazardous Waste Appropriate Measures Assessment

Lakeside MRF Limited

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General Management Appropriate Measures	
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: (NB Where the item includes multiple criteria, we have listed only the criteria that is not complied with)	
The below appropriate measure is considered to be not applicable:	
2.2.2	If you operate a 24-hour process, you must have: remote or telemetric systems to make sure an alarm would be raised in the event of an incident during unmanned hours - appropriate personnel on call to deal with these incidents You must explain these procedures in your management system.
Reason:	The Site is not a 24-hour process.
The below appropriate measures are not currently complied with but will be added to the EMS:	
2.1.2	You plan and establish the resources, procedures, objectives and targets needed for environmental performance alongside your financial planning and investment
2.1.3	You implement your environmental performance procedures, paying particular attention to: - Communication (for example of performance measures and targets)
2.1.6	You review the development of cleaner technologies and their applicability to site operations. We would expect cleaner technologies to be considered: - as a result of substantiated pollution incidents. - when reviewing management systems. - when planning investment decisions, for example new items of plant.
	When designing new plant, you must assess the environmental impacts from the plant's operating life and eventual decommissioning. You must make sure that new plant is authorised by your environmental permit.
	You must have a written procedure for proposing, considering and approving changes to procedures or infrastructure related to storing or treating waste or pollution control. This is so you can track and control the process of change.
	You compare your facility's performance against relevant sector guidance and standards on a regular basis, known as 'sectoral benchmarking'.
2.3.2	The accident management plan must identify and assess the risks the facility poses to human health and the environment. Particular areas to consider may include: - waste types
2.3.3	You must assess B28:G34the risk of accidents and their possible consequences. You can use our risk assessment (https://www.gov.uk/guidance/riskassessments-for-your-environmental-permit) guidance to help you to do this. Risk is the combination of the likelihood that a hazard will occur and the severity of the impact resulting from that hazard. Having identified the hazards, you can assess the risks by addressing six questions: - how likely is it that the accident will happen? - what may be emitted and how much? - where will the emission go – what are the pathways and receptors? - what are the consequences? - what is the overall significance of the risk? - what can you do to prevent or reduce the risk?
2.3.6	You must have a suitably trained facility employee available at all times who will act as an emergency coordinator and will take lead responsibility for implementing the accident management plan
2.4.3	You must make your contracted or regular customers are aware of your contingency plan and of the circumstances in which you would stop accepting waste from them.

2.4.4	You must consider whether the sites or companies you rely on in your contingency plan: can take waste at short notice are authorised to do so in the quantities and types likely to be needed, in addition to carrying out their existing activities.
2.4.5	If you could exceed your permitted limits, or compromise you storage or handling procedures, you must not discount alternative disposal or recovery options on the basis of extra cost or geographical distance.
2.4.9	Your management system must include procedures for auditing your performance against all of these contingency measures and for reporting the audit results to the site manager.
2.5.1	You must consider the decommissioning of the facility at the design stage and make suitable plans to minimise risks during decommissioning.
2.5.2	For existing facilities where potential risks are identified, you must implement a programme of design improvements. These design improvements must make sure that you: - avoid using subsurface tanks and pipework. - drain and clean out vessels and pipework before dismantling. - use insulation which you can remove easily without dust or hazard. - use recyclable materials, taking into account operational or other environmental objectives.
2.5.3	You must maintain a decommissioning plan to demonstrate that: - plant can be decommissioned without causing pollution. - the site will be returned to a satisfactory condition.
2.5.4	You should identify non-productive or redundant items such as tanks, pipework, retaining walls, bunds, reusable waste containers, ducts, filters and security systems and implement a programme of decommissioning and removal.
The below appropriate measures are not currently complied with and we propose they are included as an improvement condition:	
2.3.12	You must have planned for how you will manage the impacts of tidal surges and storm water flows. You must consider abnormal operating scenarios and incidents, for example, by providing buffer storage capacity. You should take into account the: - nature of the pollutants. - potential pathways effects of downstream waste water treatment. - sensitivity of the receiving environment.
2.3.13	If buffer storage capacity is required, you can only discharge from it after you have assessed the water for contamination, in order to identify an appropriate disposal route.
2.3.16	You must consider and, if appropriate, plan for the possibility that you may need to contain or abate accidental emissions from: - overflows. - tank failures. - tank wall penetrations. - site plant or machinery leaks.
2.3.21	You must: - maintain an inventory of substances which are present (or likely to be) and which could have environmental consequences if they escape.
2.4.7	Your management procedures and contingency plan must: - identify your technology's known or predictable malfunctions and the procedures, spare parts, tools and expertise needed to deal with them – so you can minimise predictable malfunctions and fix them quickly. - include a record of spare parts held, especially critical spares, or state where you can get them from and how long it would take. - have a defined procedure to identify, review and prioritise items of plant which need a preventative regime. - include all equipment or plant whose failure could directly or indirectly affect the environment or human health – if the equipment or plant is process critical then you may need to stop accepting waste or shut down your process. - make sure you have the spare parts, tools, and competent staff needed before you start maintenance.

Waste Acceptance Appropriate Measures	
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: (NB Where the item includes multiple criteria, we have listed only the criteria that is not complied with)	
The below appropriate measures are not currently complied with but will be added to the EMS:	
3.1.1	1. You must implement waste pre-acceptance procedures so that you know enough about a waste (including its composition) before it arrives at your facility. You need to do this to assess and confirm the waste is technically and legally suitable for your facility. Your procedures must follow a risk-based approach, considering: A. the source and nature of the waste. B potential risks to process safety, occupational safety and the environment (for -example, from odour and other emissions) C. knowledge about the previous waste holder.
3.1.2	Some facilities receive waste on an ad hoc basis. In those instances pre-acceptance checks can still be carried out before the waste is accepted. For example, through the exchange of information at the weighbridge before acceptance on site
3.1.3	When you receive a customer query, and before the waste arrives at your facility, you must get enough information from the waste producer to satisfy yourself that the waste has been properly assessed and classified as set out in WM3 (https://www.gov.uk/government/publications/waste-classification-technicalguidance).
3.1.4	In the case of household and similar non-household waste (including skip waste) waste is pre-accepted by the terms and conditions of the contract in place (for example skip waste companies excluding fridges and freezers or hazardous wastes). There should also be a visual pre-acceptance check before removal from the producer's premises.
3.1.5	For commercial and industrial waste you must get the following information in writing or electronic form: - details of the waste producer including their organisation name, address and contact details - a description of the waste. - the waste classification code (also referred to as a List of Waste (LoW) or European Waste Classification code. - the source of the waste (the producer's business and the specific process that has created the waste) - information on the nature and variability of the waste production process. - information about the history of the producer site if it may be relevant to the classification of the waste (for example soils and other construction and demolition arisings from a site contaminated by previous industrial uses) - the waste's physical form. - the waste's composition (based on representative samples if necessary) - a description of the waste's odour and whether it is likely to be odorous. - an estimate of the quantity you expect to receive in each load and in a year. For mirror entry LoW codes (as defined in WM3), you must keep the evidence that you have made an assessment of the waste to assign the relevant mirror entry code.
3.1.6	You do not need to have sample information if the origin of the waste is reliably understood and it clearly shows that the waste is non-hazardous. However, a visual assessment alone will not be enough to assess whether mirror entry waste is hazardous or not.
3.1.7	If the waste is a mirror entry and has not been properly assessed, you must assume it is the hazardous entry as a precautionary measure. This is likely to mean that you cannot accept it at your facility. The pre-acceptance information should be verified by contacting or visiting the producer. Dealing with staff directly involved in waste production can help to fully characterise a waste.
3.1.8	Analysis of samples must be carried out by laboratories who are UKAS (https://www.ukas.com/) or MCERTs (https://www.gov.uk/government/collections/monitoring-emissions-to-air-land-andwater-mcerts) accredited for the prescribed test.

3.1.10	You must keep pre-acceptance records for at least 3 years, with records preferably held electronically, following receipt of the waste. If an enquiry does not lead to receipt of the waste, you do not need to keep records.
3.2.2	Your procedures should follow a risk-based approach, considering: - the source, nature and age of the waste. - potential risks to process safety, occupational safety and the environment (for example, from odour and other emissions) - the potential for self-heating. - knowledge about the previous waste holder(s)
3.2.3	When deciding whether to accept waste, you must also check that the relevant storage areas and treatment processes in your facility have the physical capacity needed to handle the waste. You must not accept waste if this capacity is not available, or if you would breach your permit by doing so.
3.2.7	Where you reject waste which has been classified as hazardous, you must follow the procedure set out in our rejected loads guidance (https://www.gov.uk/guidance/hazardous-waste-rejected-loads-supplementaryguidance).
3.2.8	You must weigh each load of waste on arrival to confirm the quantities against the accompanying paperwork, unless alternative reliable and representative systems are available (for example, based upon density and volume). You must record the weight in your electronic or equivalent systems, so you can monitor available capacity at your facility. Records of incoming waste are not required for waste from householders deposited at Household Waste Recycling Facilities.
3.3.3	Quarantine storage must be separate from all other storage and clearly marked as a quarantine area.
3.3.5	You must have written procedures for dealing with wastes held in quarantine, including a maximum storage volume. The maximum storage time must take account of the potential for odour generation, pest infestation and storage conditions. If the waste is infested or odorous you must remove it within 24 hours or sooner.
3.4.6	You must keep acceptance records for a minimum of 2 years after you have treated the waste or removed it off site. You may have to keep records for longer if they are required for other purposes, for example hazardous waste consignment notes.
The below appropriate measures are not currently complied with and we propose they are included as an improvement condition:	
3.4.1	You should use an electronic or equivalent system to hold up-to-date information about the available capacity of different parts of your facility, for example reception, quarantine, treatment and storage areas. If you do not have an electronic system you still need to hold the equivalent level of information. You should use a pre-booking system to make sure that you have enough waste storage and process capacity for the incoming acceptable waste. Your electronic or equivalent system must hold all the information generated during: - pre-acceptance acceptance. - non-conformance or rejection. - storage. - repackaging. - treatment. - removal off site. This information must be readily accessible.

3.4.2	You must create records and update them to reflect deliveries, on-site treatment and despatches. Your tracking system will also operate as a waste inventory and stock control system, including both wastes and end-of waste materials produced at your facility. It must include this information as a minimum: - the date the waste arrived on site. - the original producer's details (or unique identifier) - a unique reference number. waste pre-acceptance and acceptance information. - the package type and size. - the intended treatment or disposal route. - the nature and quantity of wastes held on site. - where the waste is physically located on site. - where the waste is in the designated recovery or disposal process. - identifying the staff who have taken any decisions about accepting or rejecting waste streams and who have decided on recovery or disposal options. - details that link waste to relevant transfer notes. - details of any non-conformances and rejections, including consignment notes for waste rejected because it is hazardous.
3.4.3	The electronic (or equivalent) system must be able to report for each of LoW code: - the total quantity of waste present on site at any one time. - a breakdown of the waste quantities you are storing pending on-site treatment or awaiting onward transfer. - where a batch of waste is located based on a site plan - the quantity of waste on site compared with the limits in your management system and permit. - the length of time the waste has been on site compared with the limits in your management system and permit.
3.4.4	The electronic (or equivalent) system must also be able to report the total quantity of end-of-waste materials on site at any one time, and where that material is located based on the site plan.
3.4.5	You must store back-up copies of records off site. These records must be readily accessible in an emergency.

Waste Storage Appropriate Measures	
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: (NB Where the item includes multiple criteria, we have listed only the criteria that is not complied with)	
The below appropriate measures are considered to be not applicable:	
4.0.9	You must minimise refuse derived fuel (RDF) and solid recovered fuel (SRF) storage durations. You must implement an auditable bale identification system so that you can remove bales in date order.
4.0.10	You must securely wrap bales of RDF and SRF with high-density polyethylene (HDPE) membrane or equivalent. This is to prevent water entering, access by pests and odour release. You should inspect bales regularly and rewrap any that are damaged. If they are wrapped securely, you can store them outside (unless your permit forbids this). If you store bales outside, your fire prevention plan must manage the risks from solar heating during hot weather.
Reason:	The Site does not accept RDF.
4.0.12	All waste containers must be fit for purpose, that is: - in sound condition. - not corroded, if metal. - have well-fitting lids. - suitable for the contents. - with caps, valves and bungs in place and secure. - within the manufacturer's designed lifespan, particularly for plastic containers.
Reason:	The Site does not use containers to store waste.
The below appropriate measures are not currently complied with but will be added to the EMS:	
4.0.2	You must store waste in locations that minimise the unnecessary handling of waste.
4.0.3	Waste handling must be carried out by competent staff using appropriate equipment. You must use mechanical unloading technologies where it is possible, safe and practicable to do so.
4.0.4	Where possible, you should locate storage areas away from watercourses and sensitive perimeters, for example those close to public rights of way, housing or schools.
4.0.5	You must clearly document in your management system the maximum storage capacity of your facility and its designated storage areas. You must regularly monitor the quantity of stored waste against the allowed maximum capacities, and not exceed them. You must define capacity in terms of, for example: - cubic metres or tonnage - numbers of skips or other containers - maximum tank or vessel capacities
4.0.6	You should clearly mark all waste storage areas and provide signs indicating the type of waste stored there.
4.0.7	You must not accumulate wastes. You must treat wastes or remove them from the site as soon as possible. You must prioritise the treatment or off-site transfer of waste based on: - its type. - its age on arrival. - the date of arrival. - the duration of storage on site.
4.0.8	Except for inert waste, you must follow the first-in-first-out principle, unless you need to prioritise more recently received wastes because they pose a higher risk of pollution.
4.0.11	You must thoroughly clean storage bays and containers on a regular basis to prevent the build-up of aging waste, which will be a source of odour and attract vermin.
4.1.1	You should keep different types of waste segregated if contamination would inhibit the recovery of the waste.
4.1.2	Where paper, plastic, metal or glass have been collected separately, they must not be mixed with other waste or material. This duty applies where you are required to keep wastes separate and to help with or improve waste recovery.

Waste Treatment Appropriate Measures	
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: (NB Where the item includes multiple criteria, we have listed only the criteria that is not complied with)	
The below appropriate measure is considered to be not applicable:	
5.1.1	Soil and aggregate washing is a physicochemical treatment (not a separation or sorting activity) and you must categorise the outputs as set out in WM3.
Reason:	Soil and aggregate washing is not conducted on Site.
The below appropriate measures are not currently complied with but will be added to the EMS:	
5.0.2	You must prevent unwanted or unsuitable material from entering subsequent waste treatment processes. You must have accurate and up-to-date written details of your treatment activities and the abatement and control equipment you are using. You should include information about the characteristics of the waste to be treated and the waste treatment processes, including: - simplified process flow sheets that show the origin of the emissions. - diagrams of the main plant items where they have environmental relevance, for example, storage, tanks, treatment and abatement plant design. - details of physical processes for example separation, compaction, shredding, heating, cooling or washing. - an equipment inventory, detailing plant type and design parameters. - waste types to be subjected to the process. - the control system philosophy and how the control system incorporates environmental monitoring information. - process flow diagrams (schematics). - the hourly processing capability of waste treatment equipment. - a summary of operating and maintenance procedures. The extent of the information about your treatment activities will depend on the nature, scale and complexity of your facility and the range of environmental impacts it may have. It is also based on the type and amount of wastes processed.
The below appropriate measures are not currently complied with and we propose they are included as an improvement condition:	
5.3.1	If you are handling or treating waste before you send it to landfill follow our guidance Dispose of waste to landfill (https://www.gov.uk/guidance/disposeof-waste-to-landfill).

Emissions Control Appropriate Measures	
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: (NB Where the item includes multiple criteria, we have listed only the criteria that is not complied with)	
The below appropriate measures are considered to be not applicable:	
6.1.1	Enclosing activities within buildings can be an appropriate measure for preventing and minimising emissions of pollution, given that an appropriately designed building will reduce a range of types of pollutants, in particular, noise, dust and odour. A partially enclosed building may be an appropriate measure on its own, or together with other appropriate measures, depending on the site-specific circumstances.
6.1.2	If your waste treatment activities are likely to cause (or are causing) significant pollution at sensitive receptors which cannot be addressed by alternative measures, then you must carry out that waste treatment activity within an enclosed building.
6.1.3	You must also carry out non-treatment activities, such as storing and transferring waste (including loading and unloading) in enclosed buildings if these activities are likely to cause (or are causing) significant pollution at sensitive receptors which cannot be addressed by alternative measures. An enclosed building means a construction designed to provide sheltering cover and minimise emissions of noise, particulate matter, odour and litter. It must be enclosed on all sides. Its doorways must be as small as practicable and covered with fast-acting doors which default to the closed position. You must keep its windows closed unless you need to open them for ventilation. Dirty (process contaminated) air must pass through appropriate abatement before being emitted from the building.
6.1.5	You must regularly assess your enclosed building's integrity. You should consider using BS EN ISO 9972:2015 to demonstrate building containment. This method is based on fan pressurisation. You should carry out a smoke test at least annually and where potential faults in building integrity are likely to be causing pollution such as odour.
6.1.6	Enclosed buildings must be ventilated to provide a safe working environment for employees. Your building's ventilation system must be properly designed and effective in order for the building to provide adequate containment and prevent fugitive emissions and unacceptable noise. The engineer designing the ventilation system must be appropriately qualified. To validate the size of supply points (louvers), and the volume of dirty air that needs to be extracted, the engineer must understand and consider: - the needs of the occupants working in the building - heat release - the volume of moist gas emissions that will be generated
6.1.7	The air inside the enclosed building must be maintained under negative pressure, or you must install a localised extraction system that extracts dirty air from sources of pollution within the building. Sources that could potentially benefit from localised extraction include: - shredders and trommels - waste loading and unloading areas - odorous stockpiles
6.1.8	You must regularly assess the integrity of your building for damage that could result in fugitive emissions, including noise breakthrough. You must prevent and minimise damage by implementing a maintenance programme.
6.1.9	You must implement measures to control door opening, to make sure that the engineered ventilation system works as effectively as possible. It must direct emissions to the abatement system, rather than letting them escape as fugitive emissions through doors or windows. If you use negative pressure, it must be maintained when doors are opened, and you must monitor the pressure to demonstrate its effectiveness. Additional measures to minimise fugitive emissions may be required in some cases, for example installing an airlock entry system.

6.1.10	To reduce emissions of noise and vibration, the building must have an appropriate minimum surface density. You must install acoustic seals on doors and windows, following advice from an acoustic specialist.
Reason:	The Site has dust / noise / odour management plans and thus do not need further measures in place, such as an enclosed building.
6.2.1	You must use appropriate measures to make sure that you collect, extract and direct all process emissions to an appropriate abatement system for treatment before release. You must identify the main chemical constituents of your facility's point source emissions as part of your inventory of emissions to air. You must include the speciation of volatile organic compounds (VOCs) if you have identified them in the inventory and it is practicable to do so. You must characterise your emissions sufficiently to make sure that your chosen abatement systems are effective.
6.2.2	You must make an assessment of the fate and impact of the substances emitted to air, following the Environment Agency's risk assessment (https://www.gov.uk/guidance/risk-assessments-for-yourenvironmental-permit) guidance.
6.2.3	To reduce point source emissions to air (for example dust and odorous compounds) from the treatment of waste, you must use an appropriate combination of abatement techniques. Or you must demonstrate to us that your alternative abatement is equally effective. The appropriate combination of abatement techniques would include one of more of: - adsorption biofiltration. - biotrickling or bioscrubbing. - cyclone. - fabric filter. - water injection (into a shredder)
6.2.4	You must assess and design vent and stack locations and heights to make sure dispersion capability is adequate and noise pollution is prevented. You may need to carry out dispersion modelling (https://www.gov.uk/guidance/environmentalpermitting-air-dispersion-modelling-reports) to establish whether the height of the vent or stack allows emissions to disperse appropriately, preventing any impacts on receptors.
6.2.5	Where monitoring is required, including for odour, you must install suitable monitoring points which meet the sampling standard (https://www.gov.uk/government/collections/monitoringemissions-to-air-land-and-water-mcerts) for the relevant pollutants.
6.2.6	You must have procedures to make sure that you correctly operate, monitor and maintain abatement equipment.
6.2.7	Your monitoring should demonstrate the effectiveness of the abatement, so that you can take preventative or corrective action as necessary.
6.2.8	You should implement contingency measures for abatement system down-time and for any abnormal events, for example biofilter media change. These should include suspending operations until the site is back under control, or having standby abatement available.
6.2.9	You should design and operate abatement systems to minimise water vapour plumes.
Reason:	No point source emissions to air.
6.3.5	Relying on dispersion and wind direction to minimise pollution at sensitive receptors must be a last resort and you must not use it instead of measures that prevent and reduce pollution at source.
Reason:	Wind direction is not used as the only method to minimise pollution on Site.
6.3.7	Measures such as litter fencing and micro-netting should be located as close as possible to areas where you load and unload light-weight loose waste, if this activity is done outdoors. You should not rely on fences and screens at the perimeter of your facility to stop litter escaping.
Reason:	The Site does not have litter fencing or micro-netting.

6.3.13	You should not allow contaminated liquids to pool for long periods of time, as they can be a source of odour. If you do not have a drainage system inside the building that can collect the leachate or dirty water, then you will need other appropriate measures. You should take action to avoid ponding or pooling. Industrial vacuum cleaners can be used to suck up liquids. You should clean any spillages immediately.
Reason:	There are no contaminated liquids such as leachate or dirty water on Site.
6.5.9	You must comply with the oil storage regulations (https://www.gov.uk/guidance/storing-oil-at-a-home-orbusiness). These apply to non-hazardous wastes such as vegetable and cooking oil, as well as to biofuels and mineral oils.
Reason:	Oil is not stored on Site.
6.6.2	If you expect pests will cause pollution, hazard or annoyance at sensitive receptors, or if this has been substantiated, you must create, use and regularly review a pest management plan (https://www.gov.uk/guidance/control-and-monitoremissions-for-your-environmental-permit#pestmanagement-plan), following our guidance.
6.6.3	Your pest management plan must include procedures for: inspecting for and controlling pests rejecting loads of infested waste treating pest infestations promptly, and removing waste if necessary storing, handling and using approved pest control products – you can get information on using chemicals at work (https://www.hse.gov.uk/chemicals/using.htm) from the Health and Safety Executive.
Reason:	The Site does not have nor need a pest management plan.
The below appropriate measures are not currently complied with but will be added to the EMS:	
6.3.2	You must use your waste pre-acceptance, waste acceptance and site inspection checks and procedures to identify and manage wastes that could cause, or are causing, fugitive emissions to air. When you identify any such wastes you must: - take appropriate risk-assessed measures to prevent and control emissions. - prioritise their treatment or transfer. Where necessary to prevent fugitive emissions to air from the storage or handling of wastes, you should use a combination of the following measures: - use fully enclosed material transfer and storage systems and equipment outside buildings, for example conveyors, hoppers, containers, tanks and skips. - store and handle the waste within a suitably enclosed area (for example bays), a building or enclosed building. - keep doors closed except when access is required. - keep enclosed buildings and equipment under adequate negative pressure with an appropriate abated air circulation or extraction system, locating air extraction points close to potential emission sources. - use fast-acting or 'airlock' doors that default to closed.
6.3.12	You should wash empty vehicles before they leave your facility, to remove any residues which may be or become odorous. You must make sure the run-off from this process is contained and lawfully discharged.
6.3.14	You must cover odorous or potentially odorous waters or liquids or keep them in enclosed tanks or containers.
6.5.4	You must store and treat all waste on an impermeable surface with contained drainage that meets CIRIA 736 (https://www.ciria.org/ItemDetail?iProductCode=C736F&Category=FREEPUBS) or an equivalent approved standard. The impermeable surfaces must have sealed construction joints. These requirements do not apply in designated areas where the waste being stored or handled does not pose any significant risk of contaminating surface water or ground water. You must appropriately isolate these designated areas from other operational areas so that there cannot be any flows between them. This includes in the event of an accident, for example a fire.

6.5.5	You must provide bunds for all tanks containing liquids (whether waste or otherwise) that could be harmful to the environment if spilled. Bunds must meet CIRIA 736 (https://www.ciria.org/ItemDetail? iProductCode=C736F&Category=FREEPUBS) or an equivalent approved standard and: - be impermeable, stable and resistant to the stored materials. - have no outlet (that is, no drains or taps) and drain to a blind collection point. - have pipework routed within bunded areas with no penetration of contained surfaces. - be designed to catch leaks from tanks or fittings. - have an appropriate capacity. - have regular visual inspections – any contents must be pumped out or otherwise removed under manual control after checking for contamination. - be fitted with a high level probe and an alarm (as appropriate) if not frequently inspected - have tanker connection points within the bund (where possible), and if not possible you must provide adequate containment for spillages or leakage. - have programmed engineering inspections (extending to water testing if structural integrity is in doubt) - be emptied of rainwater regularly to maintain the containment capacity.
6.5.6	All above-ground tanks containing liquids (whether waste or otherwise) that could be harmful to the environment if spilled must be kept on an impermeable surface with contained drainage that meets CIRIA 736 or an equivalent approved standard. You must fit the tanks with alarms and cut-out systems to detect and prevent leaks and spills.
6.5.8	You must provide secondary containment that meets CIRIA 736 (https://www.ciria.org/ItemDetail? iProductCode=C736F&Category=FREEPUBS), or an equivalent approved standard, for all drums and other mobile containers which: - are greater than 200 litres in capacity and are kept outside - contain liquids (waste or otherwise) that could be harmful to the environment if spilled.
6.5.11	You must take appropriate measures to prevent emissions from washing and cleaning activities, including: - containing and directing spray, liquid effluent and wash-waters to foul sewer or collecting them in a sealed system for offsite disposal – you must not discharge them to surface or storm drains. - where possible, using biodegradable and noncorrosive washing and cleaning products. - storing all detergents, emulsifiers and other cleaning agents in suitable bunded or containment facilities, within a locked storage area, or in a building away from any surface water drains. - preparing cleaning or disinfection solutions in contained areas of the site and never in areas that drain to the surface water system or groundwater.
The below appropriate measures are not currently complied with and we propose they are included as an improvement condition:	
6.3.8	Measures such as mist sprays should be located as close as possible to point source emissions of dust, for example at conveyors, trommels, shredders, and at building entrances – except where this would increase odour from biodegradable waste. If measures such as using hoses and road sweepers do not prevent mud escaping onto the public highway, you must take further measures and you must consider installing a high pressure wheel wash. Regardless of the measures you use, you must make sure that you minimise water consumption, and that contaminated water does not escape from your facility, unless you can lawfully discharge it.
6.4.1	You must identify the main chemical constituents of your facility's point source emissions to water and sewer as part of your inventory of emissions.
6.4.2	You must assess the fate and impact of the substances emitted to water and sewer following the Environment Agency's risk assessment guidance (https://www.gov.uk/guidance/riskassessments-for-your-environmental-permit).
6.4.3	Discharges to water or sewer must comply with the conditions of an environmental permit and a trade effluent consent.

6.4.4	Relevant sources of waste water include: - runoff from all waste storage and handling areas, including loading and unloading areas. - process water. - condensate collected from treatment process. - waste compactor runoff. - vehicle washing. - washing of containers and vessels. - soil washing effluent. - vehicle oil and fuel leaks. - spills and leaks. - rainwater from bunds around containers and tanks. If you need to treat waste water before discharge or disposal, you must use appropriate treatment techniques. An appropriate combination of treatment techniques, for example, could include silt or solids removal and using an oil separator to manage site drainage.
6.4.5	You must segregate uncontaminated water streams (for example clean runoff from roofs) from those that require treatment.
6.4.6	You must separate contaminated water streams based on pollutant content and treatment required. For example, you may need to collect and treat separately contaminated surface runoff water and process water.
6.5.7	You must minimise using subsurface equipment and infrastructure and decommission it where possible. For subsurface structures, you must: - establish and record the routing of all site drains and subsurface pipework, - identify all subsurface sumps and storage vessels, - engineer systems to minimise leakages from pipes and make sure they can be detected quickly if they do occur, - provide secondary containment or leakage detection for subsurface pipework, sumps and storage vessels – vessels must be fitted with alarms and cut-out systems to detect and prevent spills when filling, - establish an inspection and maintenance programme for all subsurface structures, for example, pressure tests, leak tests, material thickness checks or CCTV.
6.5.10	You must provide appropriate buffer storage capacity at your facility to store waste waters, taking into account: - potential abnormal operating scenarios and incidents - the nature of any polluting substances and their impact on the downstream waste water treatment plant and receiving environment. You must have appropriate measures to monitor, treat and reuse the water held in the buffer storage before discharging.

Emissions Monitoring Appropriate Measures	
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: (NB Where the item includes multiple criteria, we have listed only the criteria that is not complied with)	
The below appropriate measure is considered to be not applicable:	
7.1.1	Your facility's emissions inventory must include information about the relevant characteristics of point source emissions to air, such as the: - average values and variability of flow and temperature - average and peak concentration and load values of relevant substances and their variability - presence of other substances that may affect the waste gas treatment system or plant safety, for example, oxygen, nitrogen, water vapour and dust. Guidance on monitoring stack emissions (https://www.gov.uk/government/collections/monitoringstack-emissions-environmental-permits) is available.
Reason:	No point source emissions.
7.2.1	If you operate medium combustion plant (https://www.gov.uk/guidance/medium-combustion-plantwhen-you-need-a-permit) or specified generators (https://www.gov.uk/guidance/specified-generator-whenyou-need-a-permit) you must monitor your emissions following the Environment Agency guidance on Monitoring stack emissions: low risk MCPs and specified generators (https://www.gov.uk/government/publications/monitoringstack-emissions-low-risk-mcps-and-specified-generators) and maintain a record of the type and quantity of fuel used in the plant.
7.2.2	If you have a generator that uses natural gas, for example in a boiler, you must comply with the specified generator regulations.
7.2.3	You must keep periods of start-up and shut-down for medium combustion plant and specified generators to a minimum. You must notify the Environment Agency of newly installed combustion units before start-up.
7.2.4	You must notify the Environment Agency at least 14 days in advance of any planned changes to the medium combustion plant or generator which could affect compliance with any emission limits that apply, this includes notifying us of any significant upgrades.
Reason:	The Site does not have a medium combustion plant.
The below appropriate measures are not currently complied with and we propose they are included as an improvement condition:	
7.3.1	Your facility's emissions inventory must include information about the relevant characteristics of point source emissions to water or sewer, such as: - average values and variability of flow, pH and conductivity - average concentration and load values of relevant substances and their variability, for example, chemical oxygen demand (COD) and total organic carbon (TOC), metals, priority substances or micropollutants - data on bio-eliminability, for example, biochemical oxygen demand (BOD), BOD to COD ratio, biological inhibition potential (for example, inhibition of activated sludge).
7.3.2	For relevant emissions to water or sewer identified by the emissions inventory, you must monitor key process parameters (for example, waste water flow, pH, temperature, conductivity or BOD) at appropriate locations. For example, these could either be at the: - inlet or outlet (or both) of the pre-treatment - inlet to the final treatment - point where the emission leaves the facility boundary.

Process Efficiency Appropriate Measures	
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: (NB Where the item includes multiple criteria, we have listed only the criteria that is not complied with)	
The below appropriate measures are considered to be not applicable:	
8	For your installations facility, you must monitor and review the annual quantity of: - water, energy and raw materials used - residues and waste water produced. You must do this at least once every year.
8.1.1	You must create and implement an energy efficiency plan at your facility. This must: - define and calculate the specific energy consumption of the activity (or activities) you carry out and waste stream(s) you treat - set annual key performance indicators, for example specific energy consumption (expressed in kWh/tonne of waste processed) - plan periodic improvement targets and related actions.
8.1.2	You must regularly review and update your energy efficiency plan as part of your facility's management system.
8.1.3	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	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	You must have operating, maintenance and housekeeping measures in relevant areas, for example: - air conditioning, process refrigeration and cooling systems (leaks, seals, temperature control, evaporator or condenser maintenance) - the operation of motors and drives - compressed gas systems (leaks, procedures for use) steam distribution systems (leaks, traps, insulation) - space heating and hot water systems - lubrication to avoid high friction losses - boiler operation and maintenance, for example, optimising excess air - other maintenance relevant to the activities within the facility.
8.1.6	You must have measures in place to avoid gross energy inefficiencies. These should include for example: - insulation - containment methods (such as seals and selfclosing doors) - avoiding unnecessary discharge of heated water or air (for example, by fitting simple control systems such as timers and sensors).
8.1.7	You should implement additional energy efficiency measures at the facility as appropriate, following our guidance (https://www.gov.uk/guidance/energy-efficiencystandards-for-industrial-plants-to-get-environmentalpermits).
8.2.1	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	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	You must justify the continued use of any substance for which there is a less hazardous alternative.
8.2.4	You must have quality assurance procedures to control the content of raw materials.

8.3.1	You must take measures to make sure you optimise water consumption to: - reduce the volume of waste water generated - prevent or, where that is not practicable, reduce emissions to soil and water.
8.3.2	Measures you must take include: - implementing a water saving plan (involving establishing water efficiency objectives, flow diagrams and water mass balances) - optimising the use of washing water (for example, dry cleaning instead of hosing down, using trigger control on all washing equipment) - recirculating and reusing water streams within the plant or facility, if necessary after treatment. - reducing the use of water for vacuum generation (for example, using liquid ring pumps with high boiling point liquids) where relevant.
8.3.3	You must carry out a regular review of water use (a water efficiency audit) at least every 4 years.
8.3.4	You must also: - produce flow diagrams and water mass balances for your activities - establish water efficiency objectives and identify constraints on reducing water use beyond a certain level (usually this will be site specific) - identify the opportunities for maximising the reuse, and minimising the use of water - have a timetabled improvement plan for implementing additional water reduction measures.
8.3.5	To reduce emissions to water, you should apply these general principles in sequence: - use water efficient techniques at source where possible - reuse water within the process by treating it first if necessary – if this is not practicable, use it in another part of the process or facility that has a lower water quality requirement - if you cannot use uncontaminated roof and surface water in the process, you should keep it separate from other discharge streams – at least until after you have treated the contaminated streams in an effluent treatment system and have carried out final monitoring.
8.3.6	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	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	You must minimise the volume of water you use for cleaning and washing down by: - vacuuming, scraping or mopping in preference to hosing down - reusing wash water (or recycled water) where practicable - using trigger controls on all hoses, hand lances and washing equipment.
8.3.9	You must directly measure fresh water consumption and record it regularly at every significant usage point, ideally every day.
Reason:	The Site does not complete any installation activities.

Waste Minimisation Appropriate Measures
Lakeside MRF Ltd have a comprehensive EMS that complies with all the requirements of the Waste Minimisation appropriate measures guidance.