

# BAT ASSESSMENT

Stonebrook Way, Longford, Coventry, West Midlands CV6 6LN

**Tom White Waste Ltd**

<b>Version:</b>	1.1	<b>Date:</b>	17 November 2023		
<b>Doc. Ref:</b>	STONE-3206-J	<b>Author(s):</b>	CP	<b>Checked:</b>	TWWL
<b>Client No:</b>	3206	<b>Job No:</b>	007		



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## Document History:

Version	Issue date	Author	Checked	Description
1.0	20/10/2023	EC	--	Initial draft
1.1	17/11/2023	CP	TWWL	Document issue

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**Appendix II - Summary of BAT Requirements & Implementation Plan**

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# **1 Introduction**

## **1.1 Overview of site operations**

1.1.1 This document summarises the best available techniques (BAT) specific to Tom White Waste Ltd (the operator) site situated at Stonebrook Way, Longford, Coventry, West Midlands CV6 6LN which will be operated as a Section 5.4 (a)(iii) and (b)(ii) non-hazardous waste installation comprising the pre-treatment of non-hazardous refuse derived fuel (RDF) into a solid recovery fuel (SRF) for incineration off site in addition to the current use the site as a Household, Commercial and Industrial (HCI) waste transfer station with treatment.

## **1.2 General**

1.2.1 Tom White Waste Ltd currently operate two sites which are subject to this proposed permit variation, the permit references and site locations are shown below:

- EPR/AB3906CT (SR2008No3) - Longford No2, Stonebrook Way, Longford, Coventry, West Midlands, CV6 6LN – issued 16/12/2013
- EPR/KP3698CX (A11) - Stonebrook Way Transfer Station, Stonebrook Way, Coventry, West Midlands, CV6 6LN - 13/12/2005

1.2.2 The main reason for the requirement of this BAT assessment site is the site is looking to treat more 75 tonnes of waste per day for a mix of recovery and disposal, the site will form part of the Industrial Emissions Directive (IED) Regulations which leads the requirement for this BAT assessment.

1.2.3 The above activity will form part of a consolidation of the above permits into one and to add a Section 5.4 (a)(iii) and b(ii) non-hazardous waste installation to the permit. This will involve the primary acceptance residual waste under EWC codes 19 12 10 and 19 12 12 from other waste transfer stations to produce a solid recovery fuel (SRF) which will be sent for incineration. In addition to the above. The Section 5.4 activity

will take place completely inside the confines of a suitable waste transfer building. The permit boundary will essentially comprise three sites:

- i) Longford 1 (currently operated as EPR/KP3698CX (A11) will continue to be used as an HCI waste transfer station with treatment
- ii) Longford 2 (currently operated as EPR/AB3906CT (SR2008No3) will be used as an A11 and also comprise the Section 5.4 (a)(iii) and b(ii) activity
- iii) Longford 3 (not currently permitted) will become part of the A11 HCI waste transfer station with treatment

### 1.3 **Guidance**

1.3.1 This BAT assessment has been written to demonstrate compliance with Best Available Techniques (BAT) conclusions for Waste Treatment (WTBATc) and the Non-hazardous and inert waste: appropriate measures for permitted facilities and to demonstrate that it meets the required standards. A process flow diagram (Drawing No. STONE/3206/05) is shown in Appendix IV of this assessment which clearly defines which treatment activities relate to each other. The diagram and accompanying site site layout and fire plan (Drawing No. STONE/3206/03) details how the waste operations and installation activities are clearly defined including their directly associated activities (DAA) to the 5.4 (A)(1)(b)(ii) in line with RGN2.

1.3.2 The final destination for the SRF is currently proposed at the following three locations comprising cement kilns:

**Table 1.1 – List of Combustion Plants**

<b>Permit/Installation Holder</b>	<b>Permit No.</b>	<b>Address</b>
Tarmac Cement & Lime Limited	EPR/XP3532DP	Tunstead Cement and Lime Works, Tunstead Cement and Lime Works, Wormhill, Buxton, Derbyshire, SK17 8TG
Cemex UK Cement Ltd	EPR/BL7248IH	Rugby Cement Plant, Rugby Cement Plant EPR/BL7248IH, Lawford Road, Rugby, Warwickshire, CV21 2RY
Lafarge Caudon Limited	EPR/TP3334AW	Yelsway Lane, Caudon Cement Plant EPR/TP3334AW, Waterhouses, Stoke-on-Trent, ST10 3EQ



1.3.3 The operator's focus for this material stream is UK cement manufacture so new outlets would also be searched and fall into this category.

1.3.4 The above destination sites demonstrate the activity is to be classified as recovery so the combustion facility can demonstrate that it meets the R1 Energy Recovery formula. The document will demonstrate the operation is not considered pre-treatment for a disposal operation.

1.3.5 The existing plant situated at Longford 2 recovers circa 18%, with 72% of material going out as fuel (RDF) and 10% landfill. The new SRF production line will provide recovery of 40%, 50% of material going out as fuel (SRF) and 10% landfill

## 1.4 **Summary of site operations**

1.4.1 In addition to this document the site will be operated by Tom White Waste Ltd in accordance with a number of additional management plans which should be read in conjunction with document. The list of management plans are shown below:

- Environmental Management System (EMS)
- Fire Prevention Plan (FPP)
- Noise & Vibration Management Plan (NMVP)
- Dust Management Plan (DMP)
- Odour Management Plan (OMP)

1.4.2 The operator will be carrying out the following treatment activities at the site; manual sorting, separation, screening, blending, baling, shredding, wrapping, crushing or compaction of waste. The above activities will take place as per the site layout and fire plan (Drawing No. STONE/3206/03) which should be reviewed when in addition to this written document. The above plan is shown in Appendix I of this document.

## 1.5 **BAT techniques**

1.5.1 The following best available techniques BATs have been considered to show how the site addresses the aspects detailed in the aforementioned guidance to include and therefore to ensure protection of the environment and surrounding receptors:

- Pre-acceptance of waste procedures
- Acceptance waste procedures
- Waste storage
- Staff training
- Monitoring procedures
- Accidents and incidents

1.5.2 The primary purpose of this document is to ensure that all waste received is handled and treated in the most environmentally friendly and economical way to reduce fugitive emissions which could cause harm to the environment and human health.

## **2 Pre acceptance of waste**

### **2.1 Procedures for the pre-acceptance of waste**

2.1.1 All waste proposed to be accepted will comprise only of the operator's residual waste from their other permitted sites on Coronel Avenue; EPR/HP3193LV/V003. Other waste will comprise mechanically treated residual refuse derived fuel (RDF) material from third party waste sites in surrounding areas. The EA will be informed of the sites which is waste is being received from and nature of the material and proposed mitigation procedures. It is important to note that this reduces the likelihood of any non-conforming material being accepted at the site given the waste will have been subject to previous acceptance/inspection procedures.

2.1.2 Pre acceptance procedures at the Coronel Avenue site where the waste originates from consist of the site management (technically competent manager, site manager, operations manager, site foreman) or other suitably qualified person checking the pre-acceptance data list below. For any wastes collected or tipped form third party sites, the below checks of the wastes for their suitability prior to their acceptance onto site will be adhered to. This could even involve overseeing operations at the site of production which will include:

- Nature of the process producing the waste, including the expected quantity and variability of the waste.
- The composition of the waste – representative sample(s) of the waste are taken and checked for suitability.
- For each new waste enquiry, a comprehensive characterisation of the waste is carried out (including all hazardous properties, physical appearance, odour risk)
- Checking there is sufficient and suitable storage available on the site.

2.1.3 It is considered these checks will be suitable to determine all waste arriving at this site will comprise non-hazardous RDF waste material under EWC code 19 12 10 / 19 12 12.

### **3 Waste acceptance procedures**

#### **3.1 Preliminary procedures**

3.1.1 Guidance will be given by the site management to all employees, sub-contractors, other waste carriers and customers regarding the waste types and operations which are acceptable at the site i.e. a copy of Appendix III of this document. The site will be used for the waste collection by Tom White Waste Ltd's own skip hire operations and for waste from third-party users, whose details will be checked prior to delivery of waste to the site. The procedures below are followed prior to the receipt of waste on site.

3.1.2 For in-house collections, the driver employed by the permit holder will arrive at the waste producer's premises he/she will inspect the load for conformity with relevant regulations and safety procedures.

- a) If the load is satisfactory the driver will sign the relevant paperwork (Duty of Care transfer note/delivery ticket) and remove the load from the premises.
- b) If the waste does not meet the description stated on the controlled waste transfer note the customer is advised to check the note and give a more detailed description of the waste.
- c) If the more detailed description of the waste reveals that the waste is not permitted at the recycling centre then the customer is advised that the waste must be taken to another site which is appropriately permitted to accept the waste(s).
- d) If further instructions are needed the driver may also report back to the site manager.
- e) Where it is suspected that the details given on the transfer note are incorrect the EA may be contacted for advice.
- f) Where the load contains soil from an industrial site the EA may be contacted for advice to ensure that the load to be removed does not contain contaminated soil.

## 3.2 **Checking in & inspection of loads**

3.2.1 All incoming vehicles are required to report to the site office. The details of the load will be recorded and the Duty of Care transfer note and company documentation will be further checked by the operator to ensure that the load is acceptable at the site. Any deviation from these procedures or problems with any loads will be reported to the site manager.

3.2.2 Once a load has been accepted by the operator, the driver will be asked to unsheet the vehicle (if it is sheeted) and a visual inspection of the contents will be carried out to ensure that the waste types comply with the EP. If non-compliant waste is discovered before deposit, the load will not be accepted, the driver will be informed to leave the site and dispose of the material at alternative facility. In cases where the presence of unauthorised or unusual waste is discovered during initial inspection, the EA will be contacted immediately to agree a course of action.

3.2.3 The nature of bulk loads makes full inspection difficult until the load is deposited. If the load is acceptable the driver will be instructed to deposit it within the waste reception bay as shown on Drawing No. STONE/3206/03. If the load is unacceptable following deposit, it will be reloaded and removed from the site or quarantined and removed within a timescale agreed with the EA.

## 3.3 **Waste acceptance procedure (general)**

3.3.1 All incoming vehicles upon arrival are required to report to the person in charge of waste acceptance at the site. The details of the load will be recorded and the duty of care note/company documentation will be further checked by the operator to ensure that the load is acceptable at the site, including a visual check prior to the vehicle proceeding to the tipping area. Any deviation from the procedures or problems with any loads will result in tipping facilities being suspended for the offending company. Loads which are not acceptable within the above terms will be rejected.

### 3.4 **Waste acceptance / POPs assessment**

3.4.1 Staff will be trained in the identification of any waste which could contain POPs which will include the following:

- sofas
- sofa beds
- armchairs
- kitchen and dining room chairs
- stools and foot stools
- home office chairs
- futons
- bean bags, floor and sofa cushions

3.4.2 If any of the above wastes are identified in the waste tipping and sorting area and contain leather, synthetic leather, other fabric, or foam, the items will be segregated and taken to another suitably permitted site for processing.

3.4.3 If there is a risk of contamination from the identified POPs waste i.e. if pieces of foam, cover, lining or wadding material are released from the item the whole load will be classified as POPs waste and sent for destruction.

3.4.4 It is proposed that if any POPs waste is accepted at the site, it will be in shred form and blended with the SRF produced and sent for incineration. This process would be agreed with the EA prior to commencement in line with RPS 264.

## **4 Waste Storage, Handling and treatment**

### **4.1 Waste storage and treatment summary**

4.1.1 It is proposed the site would treat a maximum of 500 tonnes per day of this material which, if operated on a 24/7 basis would comprise over 150,000 tonnes per annum. As there will be periods of downtime such as staff shortages, breakdowns etc, it is considered no more than 150,000 tonnes of waste would be treated per annum associated with the installation activity. The site is also expected to store a maximum of 1,000 tonnes of waste on site at any one time.

### **4.2 Waste deposit & handling (19 12 12)**

4.2.1 The operator will ensure that all delivery loads of 19 12 12 are clearly defined on waste transfer notes which will include a full description of the material i.e. residual / non-recyclable waste. All of this waste will be stored in segregated storage area of the building at Longford 2 comprising **AREAS 21 or 22**.

4.2.2 All staff will be trained to identify the different types of 19 12 12 material which could be accepted at the site and understand where it is to be tipped.

### **4.3 Waste deposit & handling (other wastes)**

4.3.1 Vehicles delivering mechanically processed mixed HIC waste will be directed to tip in the area shown on Drawing No. STONE/3206/03 inside the transfer building.

### **4.4 Waste treatment procedure**

4.4.1 The waste imported to the site will be tipped into the reception area for residual waste (**AREAS 21 or 22**) inside the building This material will then be subject to the following procedures:

- i) The material in **AREA 21** would be loaded to the incline conveyor to the west, the material in **AREA 22** directly feeds onto the conveyor.
- ii) The conveyor feeds a disk spreader which will remove small constituents comprising glass, wood, stone etc., which aren't suitable for SRF production and deposit them into the adjacent bay (**AREA 13**) known as the 40mm – 150mm heavy material.
- iii) Once through the disk spreader, an overband magnet will remove the metal items from the waste.
- iv) The waste continue to travel on a further conveyor then 90° into an optical sorted which will remove plastic and PVC.
- v) The adjacent RDF scanner then ensures the material is RDF and suitable for the shredding process. Before the shredding process, the material passes through a final inspection on a 2-bay picking line where operatives will carry out a final check and remove constituents not suitable to produce the SRF.
- vi) A conveyor from the picking line then directly feeds the shredder which will reduce the material to a <40mm SRF. The SRF is then left in the bay (**AREA 20**) where it can dry naturally before being removed to the combustion site.
- vii) It is important to note that above the shredder is fitted with water spray bars to keep it cool and also a dust extraction hood above to collect any airborne emission/particles. These particles are collected into a filter which will be checked and removed at least monthly. Checks would be more frequent depending on the throughout amount of the shredder. The dust extraction system will not release any emissions to air.

## 4.5 **Waste handling – non conforming wastes**

4.5.1 A visual inspection of the waste is carried out by a suitably trained operative either within the site entrance area or within the site deposit area and the accompanying paperwork (if any) is checked. If unauthorised waste is discovered after receipt and deposit, the following courses of action will take place:

- i) Return the waste to the producer and advise the EA of the deposit; or,



- ii) Where the producer/owner of the waste has left the site and cannot be contacted or where the removal off-site of the waste may cause further problems then the waste will be deposited in the quarantine area or quarantine bay / skip on site. The EA will then be contacted to agree a course of action if the waste is difficult to handle or special.

## 5 Drainage

- 5.1.1 The buildings/covered areas on site are sealed to prevent ingress of rainwater and egress of contaminated substances, the buildings/covered areas are also surfaced with an impermeable concrete floor meaning they acts as sealed drainage systems. Fire water booms are readily available to place by roller shutter doors to contain any fire water,
- 5.1.2 In terms of Longford 2, external areas of site which are used for vehicle manoeuvring and car parks drain to a series of surface gullies and an ACO drainage channel which connects to the mains sewer system to the east of the site. Before the water enters the sewer, it is treated in two no. bypass separators and then stored in two no. underground holding tanks which have a capacity of 350<sup>3</sup>. The smaller tank to the north connects to the southern tank which is fitted with a hydrobrake flow restriction device limiting the flow to 5 l/s as required by planning permission. The
- 5.1.3 Other areas of the site not in connection with the SRF production drain to foul sewer via an interceptor under two separate trade effluent consents issued by Severn Trent Water as shown on Drawing No. STONE/3206/03.
- 5.1.4 In terms of foul drainage, all foul from toilets, sinks etc.. drains directly underground into the foul system.
- 5.1.5 Visual inspections of drainage channels will be undertaken daily by trained operational with any noticeable blockages cleared and reported to the TCM or site manager. The interceptor will be monitored at least annually (or sooner if the alarm sounds) to ensure it is emptied and is in good working order.
- 5.1.6 The FPP has a detailed section on how any contaminated fire water would be contained in the event of a fire.

## **6 Training for Site Staff**

### **6.1 Training needs assessment**

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

### **6.2 Emergency procedures training**

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

### **6.3 Recognition of waste types training**

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

6.3.2 This training will be provided to all site users who handle waste on site and those in charge of administration and reporting. In-depth training will also be provided to drivers responsible for collecting wastes from the site of production. They will be

trained to identify any wastes not covered by the EP for the site and inform the producer that an alternative facility must be sought for any non-compliant wastes.

#### **6.4 Plant and equipment preventative maintenance training**

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

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

#### **6.5 Duty of care training**

6.5.1 All employees dealing with consignments of waste will be trained in the completion of Duty of Care Waste Transfer Notes and HWCN and the appropriate auditing of destination sites and/or contractors to ensure compliance.

#### **6.6 Plant operation training**

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

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

#### **6.7 Permit / EMS training**

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

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

## **7 Monitoring**

### **7.1 General Management**

7.1.1 The company have detailed written procedures and recording systems covering all aspects of site and company operations and accredited to ISO4001.

### **7.2 Plant & Equipment / Preventative maintenance**

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

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

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

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

7.2.5 Much of the plant and equipment on site and all vehicles in the fleet are subject to annual manufacturer maintenance to ensure proper working order in the form of service contracts. Site management will undertake or delegate additional preventative maintenance checks on a more frequent basis to ensure i.e. daily, before, during and at the end of each working day to ensure (where possible) the machinery is mechanically sound. These checks will be carried out using the preventative

maintenance checklist shown in Appendix II of the FPP and any results which are flagged as needing attention will also be recorded in the site diary.

## 7.3 **Accidents and Incidents**

7.3.1 The system for the identification of potential accidents, incidents and emergency situations is through risk assessments which are routinely undertaken in accordance with the operator's health and safety policy.

7.3.2 In order to prevent or reduce fame and audible events, potential accidents, incidents and emergency situations at the site, BAT is using the techniques given below:

- At introduction of new contract/working practices, procedures are established to deal with potential accidents/incidents from specific hazards, identified from experience.
- Risks are assessed on an ongoing basis and as work proceeds.
- Tom White Waste Ltd uses its expertise to provide method statements that include recognised emergency procedures which are then briefed to all site staff and any subcontractors.
- If an accident, incident or near-miss occurs, the accident reporting procedure is used to investigate and remedy the cause. Any accident or incident that falls into the RIDDOR category shall be reported accordingly and submitted to HSE within 10 days of the occurrence.
- Site management meet regularly to review the causes of any accident/ incident and corrective and preventative actions implemented to address them. This may lead to changes in working practices, training and staff information briefings to ensure that the root cause is understood and addressed.
- Investigations are undertaken by company Management.
- Meeting the requirements of S5.06 Section 2.8.

7.3.3 The manner in which the facility is managed is a critical element in ensuring emissions from the site operations are minimised. Therefore, the management of the facility ensures:

- Staff are competent to manage and operate the facility i.e. fit and proper persons
- Strict waste pre-acceptance and acceptance procedures are in place
- Procedures and control techniques in place to minimise potential emissions to air, land and water
- Operational procedures as detailed in the EMS are in place to minimise the risk of emissions having regard to the waste types being accepted and the waste processing activities at the facility
- Operational procedures are in place to minimise the risk of odours having regard to the waste types being accepted and the waste processing activities at the facility
- Appropriate storage and handling procedures are in place
- Waste despatch procedures are in place
- Provision of any impermeable surface with kerbing or sloping to protect any adjacent permeable areas
- Containment bays provided on site for the secure storage of the waste
- Wastewater management procedures in place
- There is an EMS in place for all Tom White Waste Ltd sites to ensure standards are maintained, including incidents and complaints management procedures,
- Communication programme in place
- Techniques in place for prevention and minimisation of resource consumption e.g. Energy efficiency, use of raw materials

## 7.4 **Monitoring**

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



## 7.5 **Emergency Planning**

7.5.1 The EMS, FPP, DMP, OMP and NVMP all have detailed emergency plans which are reviewed at least every two years or sooner following any incident.

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

## 8 Raw materials and justification

8.1 The site uses a limited range of raw materials, water, electricity, diesel and packaging. The use of materials and the investigation of alternatives is part of the company's continuous improvement planning. The table below details

Table 8.1– Table 5 EPC3 – 3c

Schedule 1 activity	Description of raw material and composition of raw material	Maximum amount daily	Annual throughput	Description of how raw material is used including main hazards	Justification for use (Form B3 Q6d)	Reducing waste arising from raw materials
Section 5.4 (a)(iii) and (b)(ii) - non-hazardous waste <b>Dust Suppression System</b>	Water	50 litres per hour	15,000 litres (per annum)	Mist air dust suppression system (internal and external) Longford 2  – the system does not contain any hazardous chemicals which would render the waste becoming hazardous or dangerous to the environment / human health.  – no other hazards associated other than slips, trips, falls etc.	Prevention of airbourne emissions into the atmosphere arising from the shredding of RDF material.  Health and safety for site staff reducing the risk of inhaling volatile dusts.  Keeps all wastes damp and cool thus reducing the risk of fire at the site.	No additional waste arises as a result of water use.

## **9 Waste Recovery or disposal**

- 9.1.1 The company are committed to pushing the wastes they handle and produce as far up the waste hierarchy as possible and the specialisation in low volumes of difficult to handle wastes has given a particular emphasis to this ethos.
- 9.1.2 The site uses energy in the form of electricity and diesel for lighting and operating equipment in developing this new facility they are taking the opportunity to install energy efficient equipment where possible.
- 9.1.3 The company record and analyse all energy use and have policies and procedures in place which emphasise the need to avoid unnecessary use and to identify savings and efficiencies as shown in the table overleaf:

Table 9.1– Table 5 EPC3 – 3c

Schedule 1 activity	Energy use	Maximum amount daily	Annual throughput	Description of energy use	Efficiency measures
Section 5.4 (a)(iii) and (b)(ii) - non-hazardous waste <b>Shredder 1</b> in Longford 2	Diesel (all mobile plant for loading the shredder)	300 litres	100,000litres	Used to power the shredder	The site aims to use diesel as efficiently as possible ATEX rules dictate use of fuel and plant design for operation in flammables area.
	Diesel (all mobile plant for loading the shredder)	300 litres	100,000litres	Used for mobile plant feeding the shredder	The site aims to use diesel as efficiently as possible ATEX rules dictate use of fuel and plant design for operation in flammables area.
Section 5.4 (a)(iii) and (b)(ii) - non-hazardous waste <b>Shredder 2</b> in Longford 2	Electricity	350 kwh	200,000 kWh	Used to power the shredder	The operator will meter the consumption of electrical power within the site to produce detailed in-house power use assessments.
	Diesel (all mobile plant for loading the shredder)	300 litres	100,000litres	Used for mobile plant feeding the shredder i.e., excavators	The site aims to use diesel as efficiently as possible ATEX rules dictate use of fuel and plant design for operation in flammables area.
Section 5.4 (a)(iii) and (b)(ii) - non-hazardous waste <b>Eddy Current Separator</b> in Longford 2	Electricity	200 kWh	100,000 kWh	Used to power the eddy current separator	The operator will meter the consumption of electrical power within the site to produce detailed in-house power use assessments.
Section 5.4 (a)(iii) and (b)(ii) - non-hazardous waste <b>disk spreader</b> in Longford 2	Electricity	200 kWh	100,000 kWh	Used to power the disk spreader	The operator will meter the consumption of electrical power within the site to produce detailed in-house power use assessments.
Section 5.4 (a)(iii) and (b)(ii) - non-hazardous waste <b>optical sorter</b> in Longford 2	Electricity	200 kWh	100,000 kWh	Used to power the optical sorter	The operator will meter the consumption of electrical power within the site to produce detailed in-house power use assessments.
Section 5.4 (a)(iii) and (b)(ii) - non-hazardous waste <b>Blower</b> in Longford 2	Electricity	200 kWh	100,000 kWh	Used to power the blower	The operator will meter the consumption of electrical power within the site to produce detailed in-house power use assessments.
Section 5.4 (a)(iii) and (b)(ii) - non-hazardous waste <b>Building</b> in Longford 2	Electricity	100 kWh	50,000 kWh	Used to provide adequate lighting in the building where waste treatment is undertaken	The operator will meter the consumption of electrical power within the site to produce detailed in-house power use assessments.  The building benefits from LED lighting as an energy saving measure

## **10 Closure and decommissioning**

### **10.1 Site condition report**

10.1.1 A Site Condition Report (SCR) has not been produced with this variation as there is no additional land being added to the permit but in the event the permit requires surrendering, a suitable SCR will be submitted to the EA along with a surrender application.

### **10.2 Decommissioning plan**

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

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

### **10.3 Sequence of decommissioning**

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

10.3.2 For external infrastructure storage cabinets, the gas cage, LEV filtration equipment, the weighbridge, weighbridges office etc. will be removed and sold for re-use or recycling in preference to disposal.

- 10.3.3 The drainage system and water supply will remain intact all external yards will be washed down into the below ground tanks and any residual water removed to a suitably permitted treatment works.
- 10.3.4 **Dismantling** - In line with the Waste Hierarchy efforts will be made to seek a buyer for all the plant and equipment, LEV booths cabinets forklift trucks etc. either as a whole or in suitable lots.
- 10.3.5 **Scrapping** - If no suitable parties are found to purchase the plant it will be scrapped, again either as a whole or in suitable lots.
- 10.3.6 **After plant has been removed** - The whole internal area will be subject to a thorough inspection testing remaining electrical circuits labelling testing any remaining water supply pipe work and labelling any asbestos containing materials (or dealing with in line with current regulatory framework at that time).
- 10.3.7 Deep cleaning the building, floors and removing all residues off-site to a suitably permitted facility.

## 10.4 **Monitoring**

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

## 10.5 **Permit surrender**

- 10.5.1 If the permit is to be surrendered a scheme of sampling and analysis of the soil beneath the site will be undertaken.
- 10.5.2 If analyses show any contamination to be present which would interfere with the succeeding use of the site this will be removed or treated to bring the ground/groundwater into an acceptable condition for the surrender of the permit and completion of the site condition report to the satisfaction of the EA or the relevant regulatory body at that juncture.

## **11 Environmental permitting regulations**

- 11.1.1 The permit application meets all aspects of the EPR by virtue of being part site application and part installation application.
- 11.1.2 The site benefits from planning permission which has due consideration to all local and national planning policies in relation to waste disposal and recycling /recovery.



## **12**    **Habitats**

12.1.1    The site is not located within any close proximity to sensitive sites,

# Appendix I

## Drawings



NOTES  
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REVISION HISTORY

Rev	Date	Int	Description
-	10.11.23	CP	Initial draft
A	17.11.23	CP	Application copy

- Key:
- Proposed permit boundary
  - Waste storage areas
  - Non-waste storage areas
  - Hazardous waste storage areas
  - Non-waste fuels, oils and other liquids storage
  - Temporary waste storage areas (clear prior to shutdown)
  - Waste recycling / storage buildings (impermeable concrete floor)
  - Other buildings i.e. workshops/offices
  - Impermeable concrete surfaces
  - Covered canopy (impermeable concrete beneath)
  - Tarmac/hardstanding areas - used for car parking only
  - Grass / landscaped area
  - Dust / mist & odour suppression concrete (indicative)
  - Dust extraction hoods (no discharge to air, filtered / emptied)
  - Surface water drainage fall direction
  - Foul drainage
  - Surface and mains water drainage
  - Surface gully
  - Clean and foul manholes (yellow denotes penstocks)
  - Quarantine areas
  - Hoist reels (indicative location)
  - Fire fighting equipment / extinguishers (indicative locations)
  - Plant/Electrical shut-off points (indicative location)
  - Manual fire alarms (breath gas / horns) - indicative location
  - Spill kits (indicative location)
  - Access route for emergency services
  - Fire hydrants
  - Fire assembly points
  - Out-of-hours plant storage
  - Pan, tilt and zoom cameras with 360° 50m coverage
  - Infra-red pan, tilt and zoom cameras with 360° 50m coverage
  - 0.15m wide concrete fire walls (height varies throughout)
  - 0.3m wide concrete fire walls (height varies throughout)
  - 0.8m wide concrete fire walls (height varies throughout)

Waste Storage Area Details - Longford 1 - PILE SIZES BASED ON AREA OF STOCKPILE ON SITE PLAN NOT LENGTH X WIDTH

Plan Ref	Description	Storage type	Containment	Height / width of freestall (m)	Max width (m)	Max length (m)	Height (m)	Max area (m <sup>2</sup> )	Conversion factor used	Volume (m <sup>3</sup> )	Tonnage (approx)	Maximum storage duration
AREA 1	Waste reception (tipping, inspection and sorting area (clear out-of-hours))	Free-standing / unprocessed	N/A	15	10	2	150	0.333	100	50	120	<2 hours
AREA 1 (I)	Short term quarantined waste	Hand sorted arising from tipping area (AREA 1)	Free-standing against concrete interlocking block fire wall with 0.3m wide concrete wall behind	1.0/0.8/5/0.3	6	1	0.5	18	0.5	5	2	<48 hours
AREA 2 (II)	Pre-sorted metals	As above	Open topped, movable 8 cubic yard skip	N/A	1.68	3.66	1.22	6.1488	1	8	8	<48 hours
AREA 3	Non-recyclable waste - sorted but will contain mixture of different wastes	As above	Free-standing against	5/0.3	10	5	0.5	50	0.5	13	6	<48 hours
AREA 4	Mixed H&C waste - primary shredder	Partly hand sorted arising from shredder (AREA 4)	Free-standing against concrete interlocking block fire wall	4/0.8	12	9	1	108	0.75	243	182	<48 hours
AREA 5	Mixed waste (prior to processing - also acts as holding bay feeding the plant)	Partly hand sorted arising from processing area (AREA 5)	Free-standing against concrete interlocking block fire wall	4/0.8	12	9	1	108	0.75	243	182	<48 hours
AREA 6	Plastics	Sorted (mechanical recycling line)	Free-standing and partly contained inside a three-sided concrete panel wall	10/0.18	5	5	2	25	0.75	38	19	<48 hours
AREA 7	Heavies	Sorted (mechanical recycling line)	As above	10/0.18	5	5	2	25	0.75	38	19	<48 hours
AREA 8	Ferrous metal	Sorted (mechanical recycling line) and by overband magnet	Open topped, movable 20 cubic yard roll on roll skip	N/A	6.1	2.44	1.4	14.884	1	21	21	<48 hours
AREA 9	<10mm screened fines	Sorted (mechanical recycling line)	Free-standing and partly contained inside a three-sided concrete panel wall	10/0.18	10	5.5	2	55	0.75	83	83	<48 hours
AREA 10	10mm - 40mm heavies	As above	As above	10/0.18	10	5.5	2	55	0.75	58	51	<48 hours
AREA 11	10mm - 40mm heavies	As above	As above	10/0.18	10	4.5	2	45	0.75	48	48	<48 hours
AREA 12	>150mm heavies	As above	As above	10/0.18	5	5	2	25	0.75	38	38	<48 hours
AREA 13	40mm - 150mm heavies	As above	As above	10/0.18	5	5	2	25	0.75	38	38	<48 hours
AREA 14	40mm - 300mm lights (SRF)	Articulated walk on floor trailer	As above	N/A	16.5	2.5	41.25	1	103	34	48	<48 hours
AREA 15	Metals	Sorted by overband magnet	Free-standing and partly contained inside a three-sided concrete panel wall	10/0.18	7	5.5	2	38.5	0.75	58	58	<48 hours
AREA 16	Plastics	Sorted (mechanical recycling line)	As above	10/0.18	3.7	4.5	2	16.65	0.75	25	12	<48 hours
AREA 17	PVC	Sorted (mechanical recycling line)	As above	10/0.18	3.7	4.5	2	16.65	0.75	25	12	<48 hours
AREA 18 & 19	Residual	Sorted (mechanical recycling line) and hand sorted by picking line	As above	10/0.18	3.7	4.5	2	16.65	0.75	25	12	<48 hours
AREA 20	<40mm SRF	Sorted (mechanical recycling line)	Free-standing against concrete interlocking block fire wall	4/0.8	10	12	1	120	0.75	270	90	<48 hours
AREA 21	Overflow bay (see AREAS 14, 20 & 22)	Sorted (mechanical recycling line)	Free-standing against concrete interlocking block fire wall	4/0.8	10	12	1	120	0.75	270	90	<48 hours
AREA 22	Waste containing POPs or waste shown in AREAS 14 and 21	Sorted (mechanical recycling line)	Free-standing inside sealed storage bunker	3/0.5	30	2.5	3	75	1	225	75	<48 hours

Waste Storage Area Details - Longford 1 - PILE SIZES BASED ON AREA OF STOCKPILE ON SITE PLAN NOT LENGTH X WIDTH

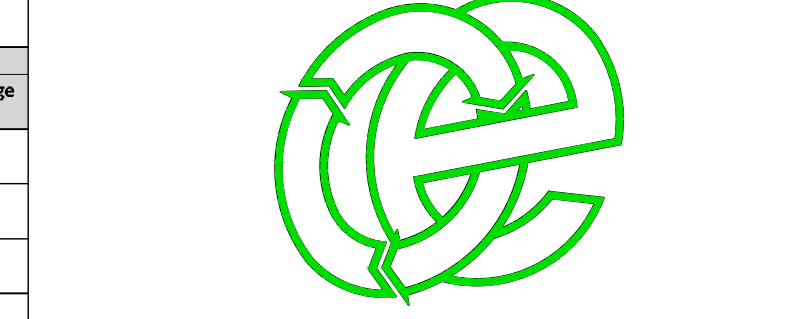
Plan Ref	Description	Storage type	Containment	Height / width of freestall (m)	Max width (m)	Max length (m)	Height (m)	Max area (m <sup>2</sup> )	Conversion factor used	Volume (m <sup>3</sup> )	Tonnage (approx)	Maximum storage duration
AREA 1A	Mixed C&D reception and sorting (clear out-of-hours)	Free-standing / unprocessed	N/A	7	7	2	49	0.333	33	24	42	<2 hours
AREA 2A	Bulky wastes	Hand sorted arising from tipping area (AREA 1A)	Free-standing against 0.3m wide concrete wall	4/0.3	8.5	6.5	1	55.25	0.5	83	83	<48 hours
AREA 3A	Mixed C&D (not pile 80% inert)	Free-standing / hand sorted	Free-standing against 0.3m wide concrete wall	4/0.3	10	7	2	70	0.5	70	53	<2 hours
AREA 4A	<40mm C&D fines (non-combustible)	Free-standing / processed by trommel	N/A	N/A	7	7	2	49	0.333	33	33	<2 hours
AREA 5A	Various containers of sorted wastes (pile based on largest container)	Containers / hand sorted	Open topped, movable 40 cubic yard skip	N/A	2.5	6.11	2.62	15.235	1	40	40	<48 hours
AREA 6A	Waste storage bays beneath shredder (contents in each bay will vary)	Sorted (mechanical recycling line)	As above	10/0.18	3.2	5.5	2	17.6	0.75	26	20	<48 hours
AREA 7A	Hardcore	Sorted (mechanical recycling line)	As above	10/0.18	3.2	5.5	2	17.6	0.75	26	20	<48 hours
AREA 8A	Storage area for wood, soils or hazardous gas processing	Pre-sorted / mechanically sorted from other areas of the site	Free-standing against 0.3m wide concrete wall	4/0.3	11	11	1	121	0.5	182	182	<48 hours
AREA 9A	Short term quarantined waste	Hand sorted arising from tipping area (AREA 1A)	Free-standing against concrete interlocking block fire wall	3/0.8 & 0.3	5	5	2	25	0.5	25	13	<48 hours
AREA 10A	Short term quarantined waste	Hand sorted arising from tipping area (AREA 1A)	Free-standing against concrete interlocking block fire wall	0.8/3	5	5	2	25	0.5	25	25	<48 hours

Waste Storage Area Details - Longford 1 - PILE SIZES BASED ON AREA OF STOCKPILE ON SITE PLAN NOT LENGTH X WIDTH

Plan Ref	Description	Storage type	Containment	Height / width of freestall (m)	Max width (m)	Max length (m)	Height (m)	Max area (m <sup>2</sup> )	Conversion factor used	Volume (m <sup>3</sup> )	Tonnage (approx)	Maximum storage duration
AREA 18 - 7B	Waste storage bays for bulking and transfer - also acting as overflow from bays from other waste stored at the site (contents in each bay will vary)	Mixture of processed and unprocessed	Free-standing against concrete interlocking block fire wall	0.8/4	6.6	6.6	1	43.56	1	131	131	<48 hours
AREA 8B	Loose paper & card	Partly hand sorted arising from bulking area	Free-standing against 0.3m wide concrete wall	5/0.3	10	6	1	60	0.75	135	45	<48 hours
AREA 9B	Baled paper & card	Baled in stacks (max 3 in length) in 3 high	Free-standing stack against 0.3m wide concrete wall	5/0.3	4	8	1	32	1	96	96	<48 hours
AREA 10B & 11B	Baled paper & card	Baled in stacks (max 3 in length) in 3 high	Free-standing stack against 0.3m wide concrete wall	4/0.3	5	7	1	35	1	105	105	<48 hours

Oaktree Environmental Ltd  
 Waste, Planning and Environmental Consultants



DRAWING TITLE  
 SITE LAYOUT & FIRE PLAN

CLIENT  
 Tom White Waste Ltd

PROJECT/SITE  
 Stonebrook Way, Longford, Coventry CV6 6LN

SCALE 3:40  
 1:300

CLIENT NO  
 3206

JOB NO  
 007

DRAWING NUMBER  
 STONE/3206/03

REV  
 A

STATUS  
 Issued

DRAWN BY  
 CP

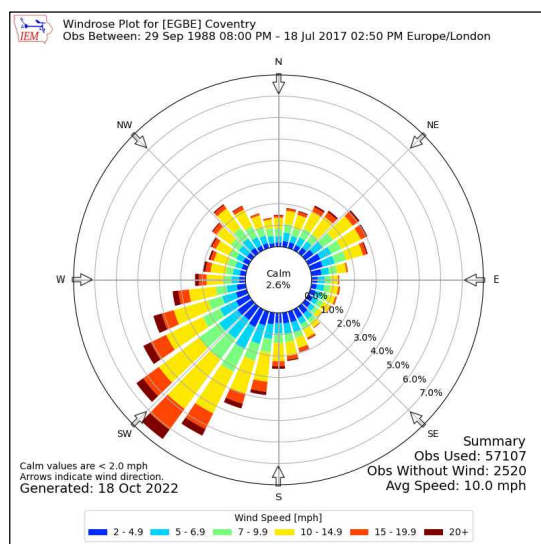
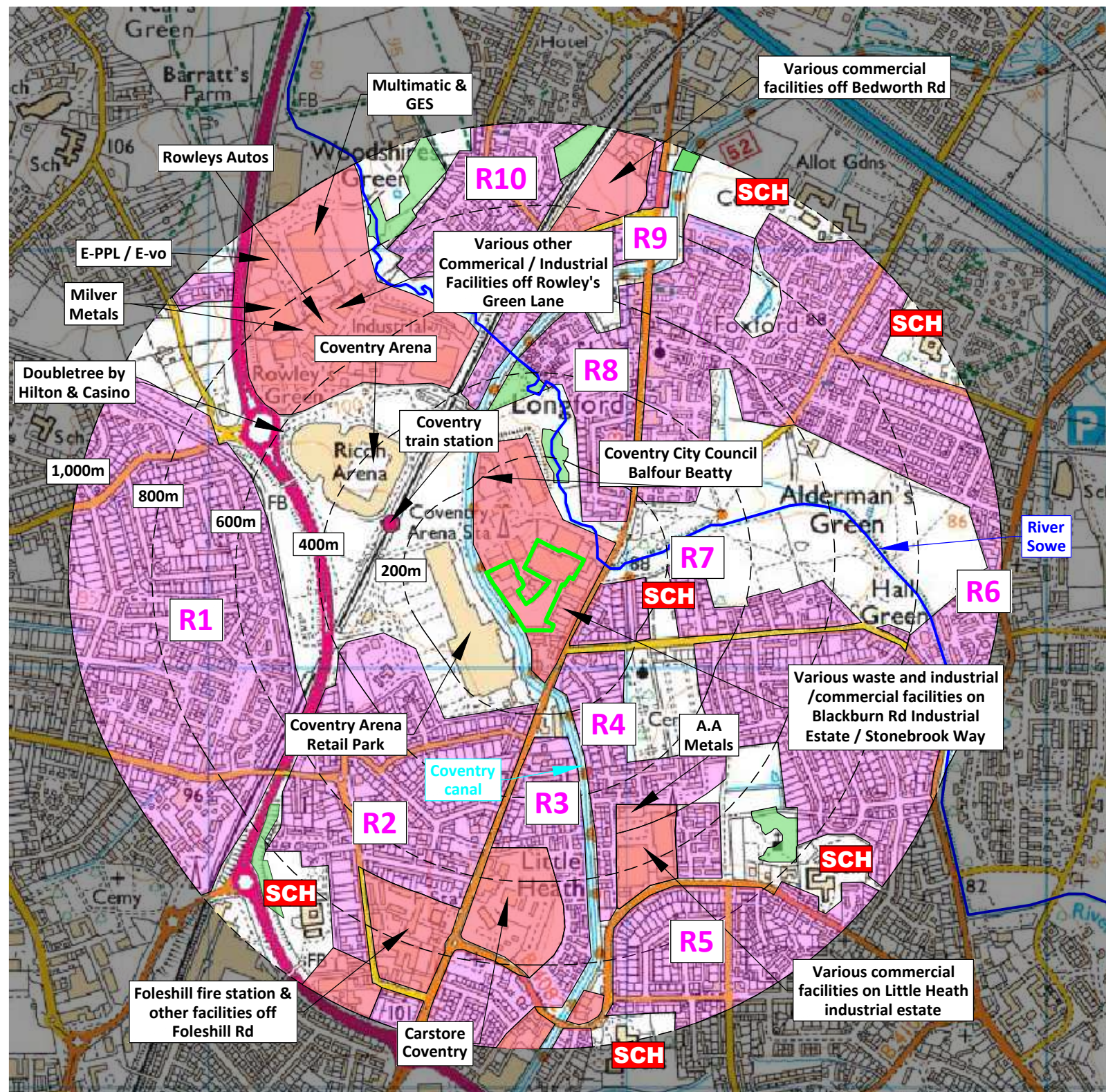
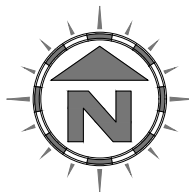
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DATE  
 17.11.23

Line House, Road Two, Winford, Cheshire, CW7 3QZ  
 t: 01606 588833 | e: sales@oaktree-environmental.co.uk

**KEY:**

- Permit boundary
- Main river
- Residential receptor blocks (may include small retail/leisure also)
- Surface water body (river / stream / pond / pool / lake)
- Workplaces (includes agriculture industry, commerce and retail)
- Areas with mix of industrial, retail, manufacturing and commercial properties
- Class A roads
- Class B roads
- Class C roads
- Railway line
- SCH School
- ↻ Woodland areas (not protected)
- Priority Habitat (deciduous woodland)



Compass Wind Rose for (EGBE) Coventry  
Period 1988-2017  
- source: Iowa State University

Scale Bar (1:12,500)

0 km 500 m 1 km

**NOTES**

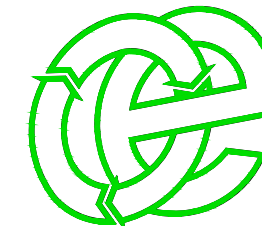
1. Boundaries are shown indicatively.
2. Wind rose data shows the prevailing wind direction to be Southerly.

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**REVISION HISTORY**

Rev:	Date:	Init:	Description:
-	14.11.23	JH	Initial drawing

**Oaktree Environmental Ltd**  
Waste, Planning and Environmental Consultants



**DRAWING TITLE**  
RECEPTOR PLAN - 1,000m

**CLIENT**  
Tom White Waste Ltd

**PROJECT/SITE**  
Building adjacent to Shawn Dream Cars, Off Longford Road, Coventry CV6 6LN

<b>SCALE @ A3</b> 1:12,500	<b>CLIENT NO</b> 3206	<b>JOB NO</b> 007
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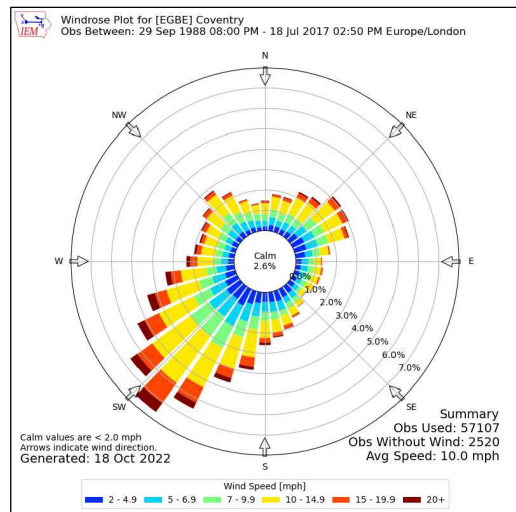
<b>DRAWING NUMBER</b> STONE/3206/04A	<b>REV</b> -	<b>STATUS</b> Issued
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<b>DRAWN BY</b> JH	<b>CHECKED</b> RS	<b>DATE</b> 14.11.23
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**KEY:**

— Permit boundary



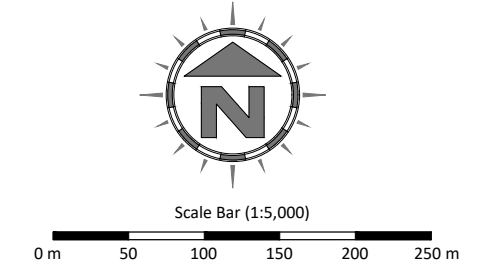
Compass Wind Rose for (EGBE) Coventry Period 1988-2017  
- source: Iowa State University

**NOTES**  
 1. Boundaries are shown indicatively.  
 2. Wind rose data shows the prevailing wind direction to be Southerly.

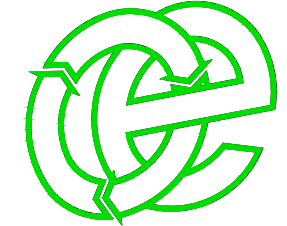
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**REVISION HISTORY**

Rev:	Date:	Init:	Description:
-	14.11.23	JH	Initial drawing



**Oaktree Environmental Ltd**  
 Waste, Planning and Environmental Consultants



**DRAWING TITLE**  
 RECEPTOR PLAN- 500m

**CLIENT**  
 Tom White Waste Ltd

**PROJECT/SITE**  
 Building adjacent to Shawn Dream Cars, Off Longford Road, Coventry CV6 6LN

SCALE @ A3	CLIENT NO	JOB NO
1:5,000	3206	007

DRAWING NUMBER	REV	STATUS
STONE/3206/04B	-	Issued

DRAWN BY	CHECKED	DATE
JH	RS	14.11.23

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# Appendix II

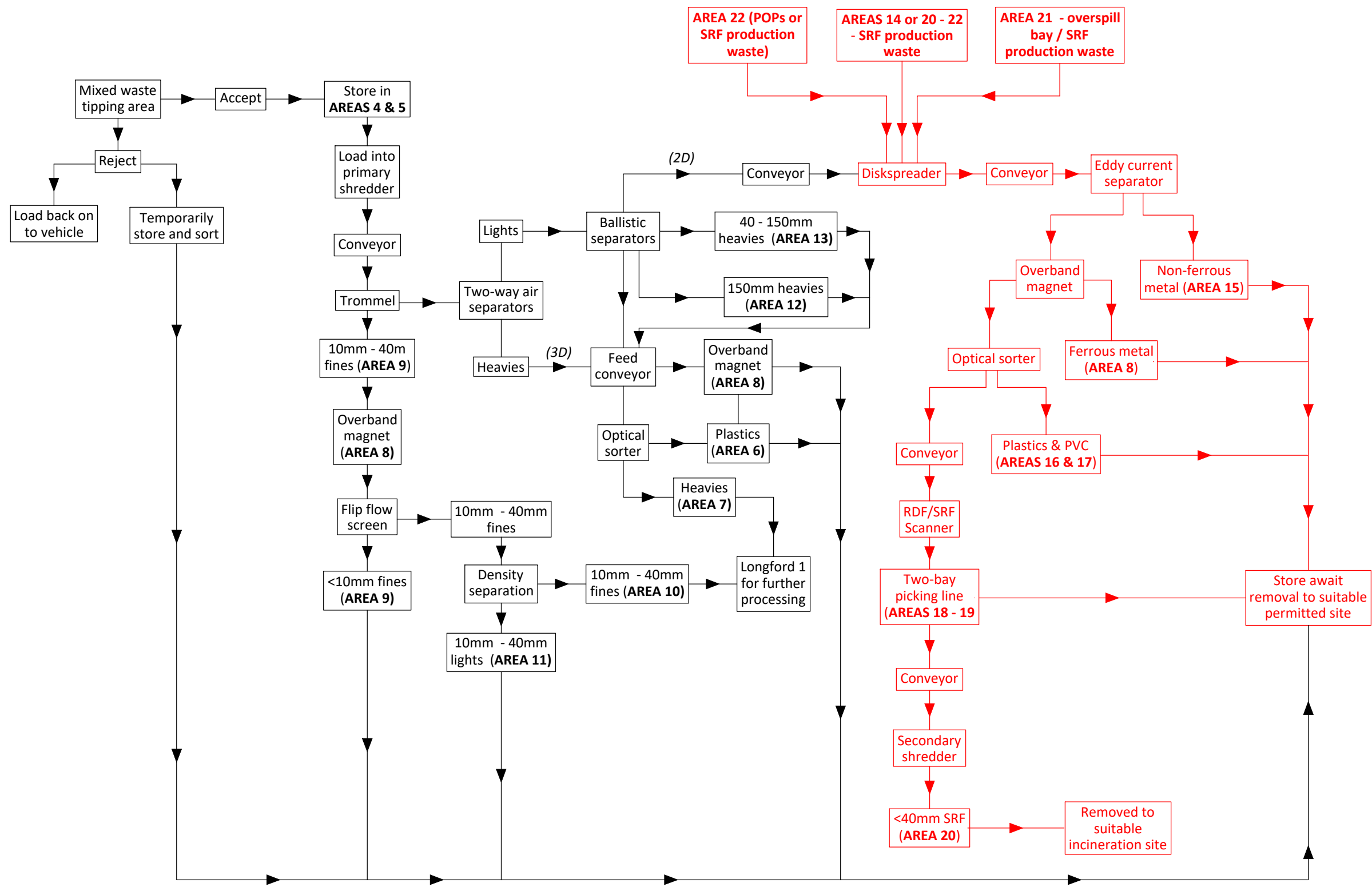
## Summary of BAT Requirements & Implementation Plan

"COMMISSION IMPLEMENTING DECISION (EU) 2018/1147" of 10 August 2018 "establishing best available techniques (BAT) conclusions for waste treatment, under Directive 2010/75/EU of the European Parliament and of the Council"		
This extract of the BAT conclusions are applicable to the site		
BAT number	Description	Action
BAT 1	Application and implementation of an Environmental Management System	Tom White Waste Ltd have Environmental Management System in accordance ISO 9001 and ISO 14001
BAT 2	Waste stream management	Tom White Waste Ltd existing Management Systems and Management Plans
BAT 3	Reduction of Emissions to Water and Air	Tom White Waste Ltd existing Management Systems and Management Plans
BAT 4	Reducing Environmental Risk Associated with Storage of Waste	Tom White Waste Ltd existing Management System and Fire Prevention Plan
BAT 5	Reducing Environmental Risk Associated with Handling and Transfer of Waste	Tom White Waste Ltd existing Management System and Fire Prevention Plan
BAT 6 & 7	Monitoring emissions to water	Point source emission on Drawing No. STONE/3206/03 to monitored at intervals and parameters agreed with the EA. Water is treated in full retention class 1 interceptor before it reaches the mains sewer system.
BAT 8	Monitoring Emissions to Air	There are point source emissions or channel uses to air
BAT 10	Monitoring Odour Emissions	Tom White Waste Ltd existing Odour Management Plan
BAT 11	Monitoring Annual Consumption of Water, Energy, Raw Materials and Annual Generation of Residues and Waste Water	Shown within sections 8 & 9 of this BAT assessment and the site operator will maintain records of water, energy and raw material consumption, in addition to generation of residues and water on at least an annual basis.
BAT 12 & 13	Reducing Odour Emissions	Tom White Waste Ltd existing Odour Management Plan
BAT 14	Reducing Diffuse Emissions, Particularly Including Dust, Organic Compounds and Odour	Tom White Waste Ltd existing Odour and Dust Management Plans
BAT 17 & 18	Preventing and Reducing Noise Emissions	Tom White Waste Ltd existing Noise Management Plan produced following a Noise Impact Assessment
BAT 19	Optimising Water Consumption	Shown within section 8 of this BAT assessment and water use will be monitored and opportunities to reduce water use will be taken, if available and if practicably possible.
BAT 20	Reducing Emissions to Water	See BAT 5, 6 & 7 actions.
BAT 21	Preventing or Limiting Environmental Consequences of Accidents and Incidents	Refer to section 7.3 of this BAT assessment.
BAT 22	Using Materials Efficiently	Refer to section 9 of this BAT assessment.
BAT 23	Using Energy Efficiently	Refer to section 9 of this BAT assessment.
BAT 24	Reducing Quantity of Waste Sent for Disposal	Tom White Waste Ltd existing Management Systems and Management Plans. There will be no packaging associated with the wastes to be used the site. Wastes will be minimised as far as is practicably possible and disposed/recovered in accordance with the Waste Hierarchy

# Appendix III

## Waste Process Flow Diagram

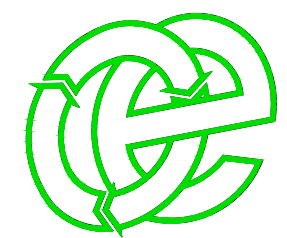




**NOTES**  
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 The SRF production process is shown in red and is all proposed. The black diagram denotes the existing activities taking place at the site under the SR2008No3 EP.

REVISION HISTORY			
Rev:	Date:	Init:	Description:
-	06.11.23	CP	Initial drawing
A	15.11.23	CP/RS	Minor amendments

**Oaktree Environmental Ltd**  
 Waste, Planning and Environmental Consultants



**DRAWING TITLE**  
 PROCESS FLOW DIAGRAM (LONGFORD 2 - SRF PRODUCTION PROCESS)

**CLIENT**  
 Tom White Waste Ltd

**PROJECT/SITE**  
 Stonebrook Way, Longford, Coventry CV6 6LN

**SCALE @ A3** Not to scale      **CLIENT NO** 3206      **JOB NO** 007

**DRAWING NUMBER** STONE/3206/05      **REV** A      **STATUS** Issued

**DRAWN BY** CP/RS      **CHECKED** RS      **DATE** 15.11.23

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