

Application for an environmental permit

Part C3 – Variation to a bespoke installation permit



Environment
Agency

Fill in this part of the form, together with part A, part C2 and part F1, if you are applying to vary (change) the conditions or any other part of the permit.

Please check that this is the latest version of the form available from our website.

You only need to give us details in this application for the parts of the permit that will be affected (for example, if you are adding a new facility or making changes to existing ones).

You do not need to resend any information from your original permit application if it is not affected by your proposed changes.

Please read through this form and the guidance notes that go with it.

The form can be:

- 1) saved onto a computer and then filled in. Please note that the form follows a logic that means questions will open or stay closed depending on a previous answer. So you may not be able to enter text in some boxes.
- 2) printed off and filled in by hand. Please write clearly in the answer spaces.

It will take less than three hours to fill in this part of the application form.

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1 What activities are you applying to vary?

Fill in Table 1a below with details of all the activities listed in schedule 1 or other references (see note 1) of the Environmental Permitting Regulations (EPR) and all directly associated activities (DAAs) (in separate rows), that you propose to vary.

Note: if you want to add a Medium Combustion Plant or Specified Generator (MCP/SG) to your installation please use part C2.5 instead. If you want to vary an intensive farm permit please use part C3.5 instead.

Fill in a separate table for each installation you are applying to vary. Use a separate sheet if you have a long list and send it to us with your application form. Tell us below the reference you have given the document.

Document reference

1 What activities are you applying to vary?, continued**Table 1a – Types of activities**

Schedule 1 listed activities						
Installation name	Schedule 1 or other references (See note 1)	Description of the activity (See note 2)	Activity capacity (See note 3)	Annex I (D codes) and Annex II (R codes) and descriptions	Hazardous waste treatment capacity (if this applies) (See note 3)	Non-hazardous waste treatment capacity (if this applies) (See note 3)
If there are not enough rows, send a separate document and give the document reference number here	Put your main activity first			For installations that take waste only	For installations that take waste only	For installations that take waste only
Directly associated activities (See note 4)						
Name of DAA If there are not enough rows, send a separate document and give the document reference number here		Description of the DAA (please identify the schedule 1 activity it serves)				
For installations that take waste (See note 5 below)		Total storage capacity				
		Annual throughput (tonnes each year)				

1 What activities are you applying to vary?, continued

Notes

1. Quote the section number, part A1 or A2 or B, then paragraph and sub paragraph number as shown in EPR part 2 of schedule 1.
2. Use the description from schedule 1 of EPR. Include any extra detail that you think would help to accurately describe what you want to do.
3. By ‘capacity’, we mean:
 - the total incineration capacity (tonnes every hour) for waste incinerators
 - the total landfill capacity (cubic metres) for landfills
 - the total capacity (cubic metres) for the recovery of hazardous waste on land
 - the total treatment capacity (tonnes each day) for waste treatment operations
 - the total storage capacity (tonnes) for waste storage operations
 - the processing and production capacity for manufacturing operations, or
 - the thermal input capacity for combustion activities
4. Fill this in as a separate line and give an accurate description of any other activities associated with your schedule 1 activities. You cannot have Directly Associated Activities (DAAs) as part of a mobile plant application.
5. By ‘total storage capacity’, we mean the maximum amount of waste, in tonnes, you store on the site at any one time.

Types of waste accepted

For those installations that take waste, for each line in Table 1a (including DAAs), fill in a separate document to list those wastes you will accept on to the site for that activity. Give the List of Wastes catalogue code and description (see <https://www.gov.uk/government/publications/waste-classification-technical-guidance>).

If you need to exclude waste from your activity or facility by restricting the description, quantity, physical nature, hazardous properties, composition or characteristic of the waste, include these in the document. Send it to us with your application form.

Please provide the reference for each document.

You can use Table 1b as a template.

If you want to accept any waste with a code ending in 99, you must provide more information and a full description of the waste in the document, (for example, detailing the source, nature and composition of the waste). Where you only want to receive specific wastes within a waste code you can provide further details of the waste you want to receive. Where a waste is dual coded you should use both codes for the waste.

Document reference of this extra information

1 What activities are you applying to vary?, continued**Table 1b – Template example – types of waste accepted and restrictions**

Waste code	Description of the waste
Example	Example
02 01 08*	Agrochemical waste containing hazardous substances
18 01 03*	Infectious clinical waste, not contaminated with chemicals or medicines – human healthcare (may contain sharps) for alternative treatment
17 05 03*/17 06 05*	Non-hazardous soil from construction or demolition contaminated with fragments of asbestos cement sheet

1c Recovery of hazardous waste on land

Are you applying for a waste recovery activity involving the permanent deposit of inorganic hazardous waste on land for construction or land reclamation?

No Now go to question 2

Yes

Have you written a waste recovery plan (WRP) that shows that you will use waste to perform the same function as non waste materials you would have used?

No You must write a WRP to support your application.

Yes

Have we advised you during pre-application discussions that we believe the activity is waste recovery?

No

Yes

Have there been any changes to your proposal since the discussions?

No

Yes

Please send us a copy of your current waste recovery plan that complies with our guidance at <https://www.gov.uk/government/publications/deposit-for-recovery-operators-environmental-permits/waste-recovery-plans-and-deposit-for-recovery-permits>. You need to highlight any changes you may have made since your pre-application discussions.

Document reference

Please note that there is an additional charge for the assessment or re assessment of a waste recovery plan that must be submitted as part of this application. For the charge see <https://www.gov.uk/government/publications/environmental-permitting-charges-guidance/environmental-permitting-charges-guidance>

2 Point source emissions to air, water and land

Fill in Table 2 below with details of the point source emissions that result from the operating techniques at each of your installations.

Fill in one table for each installation, continuing on a separate sheet if necessary.

Table 2 – Emissions (releases)

Installation name				
Point source emissions to air				
Emission point reference and location	Source	Parameter	Quantity	Unit
Point source emissions to water (other than sewers)				
Emission point reference and location	Source	Parameter	Quantity	Unit
Point source emissions to sewers, effluent treatment plants or other transfers off site				
Emission point reference and location	Source	Parameter	Quantity	Unit
Point source emissions to land				
Emission point reference and location	Source	Parameter	Quantity	Unit

You will also need to complete application form part C6 if your variation includes changing or adding a point source emission(s) to:

- water
- groundwater or
- sewer

Supporting information

3 Operating techniques

3a Technical standards

Fill in Table 3a for each activity at the installation you refer to in Table 1a above and list the ‘Best Available Techniques’ you are planning to use. If you use the standards set out in the relevant BAT conclusion(s), BAT reference document(s) (BREF) and/or technical guidance(s) (TGN) there is no need to justify using them within your documents in Table 3a.

For Part A(2) activities refer to <https://www.gov.uk/government/collections/integrated-pollution-prevention-and-control-sector-guidance-notes> and for Part B and Schedule 14 activities see <https://www.gov.uk/government/collections/local-air-pollution-prevention-and-control-lappc-process-guidance-notes>

You must justify your decisions in a separate document if:

- there is no technical standard
- the technical guidance provides a choice of standards, or
- you plan to use another standard

This justification could include a reference to the Environmental Risk Assessment provided in part C2 (general bespoke permit) of the application form.

For each of the activities listed in Table 1a, the documents in Table 3a should summarise:

- the operations undertaken
- the measures you will use to control the emissions from your process, as identified in your risk assessment or the relevant BAT conclusions, BREF or technical guidance
- how you will meet other standards set out in the relevant BAT conclusions document, BREF or technical guidance

Table 3 – Technical standards

Fill in a separate table for each activity at the installation.

Installation name		
Description of the schedule 1 activity or directly associated activity	Best available technique (BATC, BREF or TGN reference) (see footnote below)	Document reference (if appropriate)

* Directive 2010/75/EU of the European Parliament and of the Council of 24 November 2010 on industrial emissions (integrated pollution prevention and control)

In all cases, describe the type of facility or operation you are applying for and provide site infrastructure plans, location plans and process flow diagrams or block diagrams to help describe the operations and processes undertaken. Give the document references you use for each plan, diagram and description.

Document reference _____

3a1 Does your permit (in Table 1.2 Operating Techniques or similar table in the permit) have references to any of your own documents or parts of documents submitted as part of a previous application for this site?

No Now go to 3b

Yes Please tell us in a separate document what document references are no longer valid or have been superseded and why

Please also tell us below the reference number you have given the document and send it in with your application

Document reference _____

3b General requirements

Fill in a separate Table 4 for each installation.

Table 4 – General requirements

Name of the installation	
If the technical guidance or your risk assessment shows that emissions of substances not controlled by emission limits are an important issue, send us your plan for managing them	Document reference or references
Where the technical guidance or your risk assessment shows that odours are an important issue, send us your odour management plan	Document reference or references
If the technical guidance or your risk assessment shows that noise or vibration are important issues, send us your noise or vibration management plan (or both)	Document reference or references

For guidance on risk assessments for your environmental permit see <https://www.gov.uk/guidance/risk-assessments-for-your-environmental-permit>

3c Types and amounts of raw materials

Fill in Table 5 for all schedule 1 activities. Fill in a separate table for each installation.

Table 5 – Types and amounts of raw materials

Name of the installation				
Capacity (See note 1 below)				
Schedule 1 activity	Description of raw material and composition	Maximum amount (tonnes) (See note 2 below)	Annual throughput (tonnes each year)	Description of the use of the raw material including any main hazards (include safety data sheets)

Notes

- By 'capacity', we mean the total storage capacity (tonnes) or total treatment capacity (tonnes each day).
- By 'maximum amount', we mean the maximum amount of raw materials on the site at any one time. Use a separate sheet if you have a long list of raw materials, and send it to us with your application form. Please also provide the reference of this extra sheet.

Document reference

3d Information for specific sectors

For some of the sectors, we need more information to be able to set appropriate conditions in the permit. This is as well as the information you may provide in sections 5, 6 and 7. For those activities listed below, you must answer the questions in the related document.

Table 6 – Questions for specific sectors

Sector	Appendix
Combustion	See the questions in appendix 1
Chemicals	See the questions in appendix 2
Incinerating waste	See the questions in appendix 3
Landfill and recovery of hazardous waste on land	See the questions in appendix 4

General information

Complete section 4 if you are proposing to change or add an emission point(s).

4 Monitoring

4a Describe the measures you use for monitoring emissions by referring to each emission point in Table 2 above

You should also describe any environmental monitoring. Tell us:

- how often you use these measures
- the methods you use
- the procedures you follow to assess the measures

Document reference

4b Point source emissions to air only

4b1 Has the sampling location been designed to meet BS EN 15259 clause 6.2 and 6.3?

No

Yes

4b2 Are the sample ports large enough for monitoring equipment and positioned in accordance with section 6 and appendix A of BS EN 15259?

No

Yes

4b3 Is access adjacent to the ports large enough to provide sufficient working area, support and clearance for a sample team to work safely with their equipment throughout the duration of the test?

No

Yes

4b4 Are the sample location(s) at least 5 HD from the stack exit

No

Yes

4b5 Are the sample location(s) at least 2 HD upstream from any bend or obstruction?

No

Yes

4b6 Are the sample location(s) at least 5 HD downstream from any bend or obstruction?

No

Yes

4b7 Does the sample plane have a constant cross sectional area?

No

Yes

4b8 If horizontal, is the duct square or rectangular (unless it is less than or equal to 0.35 m in diameter)

No

Yes

4b9 If you have answered 'No' to any of the questions 4b1 to 4b8 above, provide an assessment to how the standards in BS EN 15259 will be met.

Document reference of the assessment

7 How to contact us

If you need help filling in this form, please contact the person who sent it to you or contact us as shown below.

General enquiries: 03708 506 506 (Monday to Friday, 8am to 6pm)

Textphone: 03702 422 549 (Monday to Friday, 8am to 6pm)

Email: enquiries@environment-agency.gov.uk

Website: <https://www.gov.uk/government/organisations/environment-agency>

If you are happy with our service, please tell us. It helps us to identify good practice and encourages our staff. If you're not happy with our service, please tell us how we can improve it.

Please tell us if you need information in a different language or format (for example, in large print) so we can keep in touch with you more easily.

Feedback

(You don't have to answer this part of the form, but it will help us improve our forms if you do.)

We want to make our forms easy to fill in and our guidance notes easy to understand. Please use the space below to give us any comments you may have about this form or the guidance notes that came with it.

How long did it take you to fill in this form? _____

We will use your feedback to improve our forms and guidance notes, and to tell the Government how regulations could be made simpler.

Would you like a reply to your feedback?

Yes please

No thank you



For Environment Agency use only

Date received (DD/MM/YYYY)

Payment received?

No

Our reference number

Yes

Amount received

£ _____

Plain English Campaign's Crystal Mark does not apply to appendices 1 to 4.

Appendix 1 – Specific questions for the combustion sector

1 Identify the type of fuel burned in your combustion units (including when your units are started up, shut down and run as normal). If your units are dual fuelled (that is, use two types of fuel), list both the fuels you use

Fill in a separate table for each installation.

Installation reference			
Type of fuel	When run as normal	When started up	When shut down
Coal			
Gas oil			
Heavy fuel oil			
Natural gas			
WID waste			
Biomass (see notes 1 and 2 below)			
Biomass (see notes 1 and 2 below)			
Biomass (see notes 1 and 2 below)			
Biomass (see notes 1 and 2 below)			
Biomass (see notes 1 and 2 below)			
Landfill gas			
Other			

Notes

1. Not covered by Industrial Emissions Directive 2010/75/EU.
2. 'Biomass' is referred to The Renewables Obligation Order 2002 (<https://www.legislation.gov.uk/uksi/2002/914/contents/made>)

Give extra information if it helps to explain the fuel you use.

Document reference

Appendix 1 – Specific questions for the combustion sector, continued

2 Give the composition range of any fuels you are currently allowed to burn in your combustion plant

Fill in a separate table for each installation, continuing on a separate sheet if necessary

Fuel use and analysis					
Installation reference					
Parameter	Unit	Fuel 1	Fuel 2	Fuel 3	Fuel 4
Maximum percentage of gross thermal input	%				
Moisture	%				
Ash	% wt/wt dry				
Sulphur	% wt/wt dry				
Chlorine	% wt/wt dry				
Arsenic	% wt/wt dry				
Cadmium	% wt/wt dry				
Carbon	% wt/wt dry				
Chromium	% wt/wt dry				
Copper	% wt/wt dry				
Hydrogen	% wt/wt dry				
Lead	% wt/wt dry				
Mercury	% wt/wt dry				
Nickel	% wt/wt dry				
Nitrogen	% wt/wt dry				
Oxygen	% wt/wt dry				
Vanadium	mg/kg dry				
Zinc	mg/kg dry				
Net calorific value	MJ/kg				

Appendix 1 – Specific questions for the combustion sector, continued**3 If NO_x factors are necessary for reporting purposes (that is, if you do not need to monitor emissions), please provide the factors associated with burning the relevant fuels**

Fill in a separate table for each installation.

Installation reference	
Fuel	NO _x factor (kg t ⁻¹)
Fuel 1	
Fuel 2	
Fuel 3	
Fuel 4	

Note: kg t⁻¹ means kilograms of nitrogen oxides released for each tonne of fuel burned.

4 Will your combustion plant be subject to Chapter III of the Industrial Emissions Directive 2010/75/EU?

No Now fill in application form part F

Yes

5 What is your plant?

an existing one A plant licensed before 1 July 1987

a new one A plant licensed on or after 1 July 1987 but before 27 November 2002, or a plant for which an application was made before 27 November 2002 and which was put into operation before 27 November 2003

a new-new one A plant for which an application was made on or after 27 November 2002 If you run more than one type of plant or a number of the same type of plant on your installation, please list them in the table below

6 If you run more than one type of plant or a number of the same type of plant on your installation, please list them in the table below

Fill in a separate table for each installation.

Installation reference	
Type of plant	Number within installation
Existing	
New	
New-new	
Gas turbine (group A)	
Gas turbine (group B)	

Appendix 1 – Specific questions for the combustion sector, continued**7 If you run an existing plant, have you submitted a declaration for the ‘limited life derogation’ set out in Article 33 of Chapter III of the Industrial Emissions Directive?**

No Now go to question 9

Yes

8 Have you subsequently withdrawn your declaration?

No

Yes

9 List the existing large combustion plants (LCPs) which have annual mass allowances under the National Emission Reduction Plan (NERP), and those with emission limit values (ELVs) under the LCPD

Installation reference	
LCPs under NERP	LCPs with ELVs

10 Do you meet the monitoring requirements of Chapter III of the Industrial Emissions Directive?

No

Yes Document reference

11 Are you substantially refurbishing an existing installation according to the meaning given in Article 14 of the Energy Efficiency Directive?

No

Yes Now go to question 12

12 Have you carried out a cost–benefit assessment (CBA) of opportunities for cogeneration (combined heat and power) or district heating under Article 14 of the Energy Efficiency Directive?

No Please provide supporting evidence of why a CBA is not required (for example, an agreement from us)

Document reference of this evidence

Yes Please submit a copy of your CBA

Document reference of the CBA

Appendix 2 – Specific questions for the chemical sector

1 Please provide a technical description of your activities

- The description should be enough to allow us to understand:
- the process
- the main plant and equipment used for each process
- all reactions, including significant side reactions (that is, the chemistry of the process)
- the material mass flows (including by products and side streams) and the temperatures and pressures in major vessels
- the all emission control systems (both hardware and management systems), for situations which could involve releasing a significant amount of emissions – particularly the main reactions and how they are controlled
- a comparison of the indicative BATs and benchmark emission levels standards: technical guidance notes (TGNs) (see <https://www.gov.uk/government/collections/technical-guidance-for-regulated-industry-sectors-environmental-permitting>); additional guidance ‘The production of large volume organic chemicals’ (EPR 4.01); ‘Speciality organic chemicals sector’ (EPR 4.02); ‘Inorganic chemicals sector’ (EPR 4.03); and best available techniques reference documents (BREFs) for the chemical sector

Document reference

2 If you are applying for a multi-purpose plant, do you have a multi-product protocol in place to control the changes?

No

Yes Provide a copy of your protocol to accompany this application

Document reference

3 Does Chapter V of the Industrial Emissions Directive (IED) apply to your activities?

No

Yes Fill in the following

3a List the activities which are controlled under the IED

Installation reference	
Activities	

3b Describe how the list of activities in question 3a above meets the requirements of the IED

Document reference

Appendix 3 – Specific questions for the waste incineration sector

If you are proposing to accept clinical waste, please complete your answer to question 3a ‘Technical standards’ with reference to relevant parts of our healthcare waste appropriate measures guidance (see <https://www.gov.uk/guidance/healthcare-waste-appropriate-measures-for-permitted-facilities>)

1a Do you run incineration plants as defined by Chapter IV of the Industrial Emissions Directive (IED)?

No You do not need to answer any other questions in this appendix

Yes IED applies

1b Are you subject to IED as

An incinerator?

A co-incinerator?

2 Do any of the installations contain more than one incineration line?

No Now go to question 4

Yes

3 How many incineration lines are there within each installation?

Fill in a separate table for each installation.

Installation reference		
Number of incineration lines within the installation		
Reference identifiers for each line		

You must provide the information we ask for in questions 4, 5 and 6 below in separate documents. The information must at least include all the details set out in section 2 (‘Key Issues’) of S5.01 ‘Incineration of waste: additional guidance’ (under the sub heading ‘European legislation and your application for an EP Permit’). See <https://www.gov.uk/government/collections/technical-guidance-for-regulated-industry-sectors-environmental-permitting>.

You must answer questions 7 to 13 on the form below.

4 Describe how the plant is designed, equipped and will be run to make sure it meets the requirements of IED, taking into account the categories of waste which will be incinerated

Document reference

5 Describe how the heat created during the incineration and co-incineration process is recovered as far as possible (for example, through combined heat and power, creating process steam or district heating)

Document reference

Appendix 3 – Specific questions for the waste incineration sector, continued

6 Describe how you will limit the amount and harmful effects of residues and describe how they will be recycled where this is appropriate

Document reference

For each line identified in question 3, answer questions 7 to 13 below

Question 3 identifier, if necessary

7 Do you want to take advantage of the Article 45 (1)(f) allowance (see below) if the particulates, CO or TOC continuous emission monitors (CEM) fail?

No

Yes This allows ‘abnormal operation’ of the incineration plant under certain circumstances when the CEM for releases to air have failed. Annex VI, Part 3(2) sets maximum half hourly average release levels for particulates (150 mg/m³), CO (normal ELV) and TOC (normal ELV) during abnormal operation.

Describe the other system you use to show you keep to the requirements of Article 13(4) (for example, using another CEM, providing a portable CEM to insert if the main CEM fails, and so on).

8 Do you want to replace continuous HF emission monitoring with periodic hydrogen fluoride (HF) emission monitoring by relying on continuous hydrogen chloride (HCl) monitoring as allowed by IED Annex VI, Part 6 (2.3)?

Under this you do not have to continuously monitor emissions for hydrogen fluoride if you control hydrogen chloride and keep it to a level below the HCl ELVs.

No

Yes Please give your reasons for doing this

Appendix 3 – Specific questions for the waste incineration sector, continued

9 Do you want to replace continuous water vapour monitoring with pre-analysis drying of exhaust gas samples, as allowed by IED Annex VI, Part 6 (2.4)?

Under this you do not have to continuously monitor the amount of water vapour in the air released if the sampled exhaust gas is dried before the emissions are analysed.

No

Yes Please give your reasons for doing this

10 Do you want to replace continuous hydrogen chloride (HCl) emission monitoring with periodic HCl emission monitoring, as allowed by IED Annex VI, Part 6 (2.5), first paragraph?

Under this you do not have to continuously monitor emissions for hydrogen chloride if you can prove that the emissions from this pollutant will never be higher than the ELVs allowed.

No

Yes Please give your reasons for doing this

Appendix 3 – Specific questions for the waste incineration sector, continued

11 Do you want to replace continuous HF emission monitoring with periodic HF emission monitoring, as allowed by IED Annex VI, Part 6 (2.5), first paragraph?

Under this you do not have to continuously monitor emissions for hydrogen fluoride if you can prove that the emissions from this pollutant will never be higher than the ELVs allowed.

No

Yes Please give your reasons for doing this

12 Do you want to replace continuous SO₂ emission monitoring with periodic sulphur dioxide (SO₂) emission monitoring, as allowed by IED Annex VI, Part 6 (2.5), first paragraph?

Under this you do not have to continuously monitor emissions for sulphur dioxide if you can prove that the emissions from this pollutant will never be higher than the ELVs allowed.

No

Yes Please give your reasons for doing this

Appendix 3 – Specific questions for the waste incineration sector, continued

13 If your plant uses fluidised bed technology, do you want to apply for a derogation of the CO WID ELV to a maximum of 100 mg/m³ as an hourly average, as allowed by IED Annex VI, Part 3?

No

Does not apply

Yes Please give your reasons for doing this

14 Are you substantially refurbishing an existing installation according to the meaning given in Article 14 of the Energy Efficiency Directive?

No

Yes Please go to question 15

Document reference of the CHP-ready assessment _____

15 Have you carried out a cost–benefit assessment (CBA) of opportunities for cogeneration (combined heat and power) or district heating under Article 14 of the Energy Efficiency Directive?

No Please provide supporting evidence of why a CBA is not required
(for example, an agreement from us)

Document reference of this evidence _____

Yes Please submit a copy of your CBA

Document reference of the CBA _____

Appendix 4 – Specific questions for the landfill sector and recovery of hazardous waste on land activities

- 1. For the landfill sector, provide your Environmental Setting and Installation Design (ESID) report and any other risk assessments to control emissions.**

For recovery of hazardous waste on land activities, provide your Environmental Setting and Site Design (ESSD) report and any other risk assessments to control emissions

Document reference

- 2. For recovery of hazardous waste on land activities, provide your Waste Acceptance Procedures (including Waste Acceptance Criteria)**

Document reference

Refer to our guidance at

<https://www.gov.uk/government/publications/deposit-for-recovery-operators-environmental-permits/waste-acceptance-procedures-for-deposit-for-recovery>

- 3. Provide your hydrogeological risk assessment (HRA) for the site**

Document reference

- 4. Provide your outline engineering plan for the site**

Document reference

- 5. Provide your stability risk assessment (SRA) for the site**

Document reference

- 6. Provide your landfill gas risk assessment (LFGRA) for the site**

Document reference

We have developed guidance on these assessments and their reports which can be found at <https://www.gov.uk/government/collections/environmental-permitting-landfill-sector-technical-guidance>

- 7. For recovery of hazardous waste on land activities, have you completed a monitoring plan for the site?**

No Please refer to the section of your ESSD that explains why this is unnecessary for your site

Document reference of this evidence

Yes Document reference

- 8. Have you completed a proposed plan for closing the site and your procedures for looking after the site once it has closed?**

No If you have answered 'no' for recovery of hazardous waste on land activities, refer to the section of your ESSD that explains why this is unnecessary for your site

Document reference of this evidence

Yes For landfill you must provide a closure and aftercare plan

Document reference