Appropriate Measures Assessment

Crayford Materials Recycling Facility

6th January 2026

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Appropriate Measures Assessment

Crayford Materials Recycling Facility

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This document has been prepared by Sol Environment on behalf of N+P Crayford MRF Ltd (hereafter referred to as 'the client' or 'N+P' to provide an Appropriate Measures Assessment against the Environment Agency '*Non-hazardous and inert waste: appropriate measures for permitted facilities guidance'.*

Table 1.1 below outlines the key requirements of the guidance document and demonstrates how the site will meet these requirements or, where compliance is not possible, justifies any potential deviations and details the alternative measures that will be implemented.

Table 1.1 Appropriate Measures Assessment

Guidance	Appropriate Measures Met – YES/NO	Justification and Alternative Measures
1.0 When appropriate measures apply		Information provided within the guidance for reference only.
1.1 Who this guidance is for		
1.2 Assessing appropriate measures for your site		
1.3 Implementing appropriate measures at new and existing facilities		
1.4 Site Design and Suitability		
You should consider the potential impacts of climate change when selecting a site, especially: • flood risk • drought • extreme temperatures • extreme weather events You should have enough space on site to manage wastes and to make sure that you minimise potential pollution impacts on nearby receptors.	YES	The proposed variation will operate on an existing site, however an Environmental Risk Assessment has been completed which considers the potential flood risk and climate change risk on site. The updated Environmental Risk Assessment is provided within Annex C – Environmental Risk Assessment of this application. The site also operates in accordance with a Fire Prevention Plan which is provided within Annex G – Fire Prevention Plan of this

For example, you should have enough space for appropriate fire breaks between stockpiles of combustible waste, and to allow access for fire-fighting. The storage and handling of waste on site must be located as far as technically and economically possible from sensitive receptors and watercourses, while minimising unnecessary handling. Access doors should be on the side of any buildings that are opposite to sensitive receptors. You must have enough space on site to operate your plant and equipment safely, and to segregate waste to prevent cross-contamination. Environmental permits set limits on the amount of waste an operator can bring onto site on an annual basis. The permit may also set other capacity limits, for example the maximum quantity of a particular waste type at any one time. The physical capacity of your site may not be large enough to safely handle, without causing pollution, the amount of waste your permit allows. You must make sure that the quantities of waste at your facility are manageable at all times and do not exceed your capacity to store and treat waste. At the design stage you should consider: • how you will monitor emissions from your site; and		application. This ensure the waste is stored appropriately in accordance with the EA's Fire Prevention Plan Guidance.

• the access to waste treatment processes so you can take representative samples.		

2. General Management Appropriate Measures

2.1 Management System

1. You must have an up-to-date written management system, and activities at your facility must follow it. Your management system must incorporate the following features. You have: • management commitment, including from senior managers • an environmental policy that is approved by senior managers and includes the continuous improvement of the facility's environmental performance, so you can identify pollution risks and minimise them through appropriate measures You plan and establish the resources, procedures, objectives and targets needed for environmental performance alongside your financial planning and investment. You implement your environmental performance procedures, paying particular attention to: • staff structure and relevant responsibilities • staff recruitment, training, awareness and competence • communication (for example of performance measures and targets) • employee involvement • documentation	YES	N+P operate an Integrated Management System (IMS) that has been certified to ISO 9001:2015, ISO14001:2018 and ISO 45001:2018. The IMS is designed to ensure: • The identification of all foreseeable environmental impacts and risks that the operators activities pose to the environment; • Prevention or minimisation of any identified risks to practical minimum; • Legal compliance assurance; • Identification of risks of pollution including those arising from operations, maintenance, accidents, incidents, non-conformances and complaints, and how these will be minimised; • Activities at the site will be managed in accordance with the management system, which will be subject to continuous review, audit and improvement. Specific detailed management system reviews will take place if there is a significant change to the activities, following an accident or if a non-compliance is found; and

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- effective process control
- maintenance programmes
- management of change
- emergency preparedness and response
- making sure you comply with environmental legislation

You check environmental performance and take corrective action, paying particular attention to:

- monitoring and measurement
- learning from incidents, near misses and mistakes, including those of other organisations
- records maintenance
- independent (where practicable) internal or external auditing of the management system to confirm it has been properly implemented and maintained

Senior managers must review the management system to check it is still suitable, adequate and effective at least annually. Improvements should be carried out within a reasonable time, based on the level of environmental risk.

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

- Furthermore, the whole management system will be subject to an annual external audit by a competent third party.

The management plan and procedures have been written to ensure that the environmental risk and impact of the normal running of the site activities are documented and minimised. The management system is fully developed, implemented and in operation and a copy of the management system is kept at a convenient location on site.

A review of the sites energy efficiency is undertaken annually as part of the Integrated Management System. The review recommends practicable measures for improving energy efficiency and specifies a maximum period for actions to be undertaken.

All activities are undertaken in accordance with the relevant permits held for site. No non-permitted activities are undertaken on site.

The site operates the following documentation for site activities in accordance with the sites IMS:

- Inventory of emissions to air and water;
- Accident Management Plan;
- Site Condition Report;
- Litter and Dust Management Plan;

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- 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 consider the risks that a changing climate poses to your operations. You have appropriate plans in place to assess and manage future risks.

You compare your facility's performance against relevant sector guidance and standards on a regular basis, known as 'sectoral benchmarking'.

You have and maintain the following documentation as part of your management system:

- inventory of emissions to air and water
- residues management plan
- accident management plan
- site infrastructure plan
- site condition report for new facilities or where you are increasing the facility's area
- odour management plan, if required
- Environmental Risk Assessment including climate change risk; and
- Fire Prevention Plan.

• noise and vibration management plan, if required • dust, mud and litter management plans, if required • pest management plan, if required • fire prevention plan, unless your facility does not handle combustible waste • climate change risk assessment and adaptation plan Your management system must include a schedule of inspection and maintenance for all pollution control infrastructure, including for example the: • impermeable surfacing and drainage system • ducts of abatement systems • You must have a document control procedure that clearly describes how and when you will periodically review documentation and maintain version control. Your management system must clearly set out the actual physical capacity of your facility to store and handle waste, which may be less than the quantity limits allowed by your permit. You must specify limits for the maximum: • waste storage capacity at any one time • daily and annual throughputs • residence time for waste When doing this, you must take into account the characteristics of your facility and the waste types and the pollution risks, for example fire and odour.		

Your limits must also reflect the constraints of the available space and waste handling processes. You must include factors like seasonal changes in supplies of inputs, and markets for outputs.		
2.2 Staff Competence		
1.Your facility must be operated at all times by an adequate number of staff with appropriate training, qualifications and competence. You must keep records of training, qualifications and relevant experience. 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. 3. The design, installation and maintenance of infrastructure, plant and equipment must be carried out by competent people, including Construction Quality Assurance where appropriate. 4. You must have appropriately qualified managers for your waste activity who are members of a government approved technical competence scheme and who attend the facility as set out in our attendance guidance. 5. Staff carrying out waste acceptance checks, including sampling and analysis of waste, must be appropriately trained and competent to: • classify and characterise waste properly	YES	The design, installation and maintenance of the proposed SRF processing line will be carried out by competent people. The site will continue to be manned and operated by appropriately trained site operatives. The Site Manager has the relevant WAMITAB qualifications for the operations on site. The site is manned 24 hours a day. Any member of site staff or site security will raise the alarm in the event of an incident.

• identify whether it is suitable for your facility • manage any loads that do not conform to waste acceptance criteria • determine end of waste products		

2.3 Accident Management Plan

1. As part of your written management system you must have a plan for dealing with any incidents or accidents that could result in pollution, including near misses. 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 • transferring substances, for example filling (including overfilling) or emptying of vessels and containers • preventing incompatible substances coming into contact with each other • failure of plant and equipment, for example storage tanks and pipework, or blocked drains • failure of containment, for example bund failure or drainage sumps overfilling • making the wrong connections in drains or other systems • failure to contain firefighting water • failure of abatement systems • hazardous atmospheres in confined spaces	YES	The Site operates in accordance with the existing Accident Management Plan which forms part of the site's IMS and meets the relevant sections of the appropriate measures. The site's accident and emergencies procedures are detailed within the Accident Management Plan. Any accidents or incidents will be recorded on site as part of the sites EMS. The Environment Agency will be notified following any event that may cause significant pollution. The site is manned 24 hours a day and any member of site staff or site security will raise the alarm as soon as they become aware of any incident or emergency. All employees are trained to ensure they know how to safely respond to an emergency. The on site security measures prevent unauthorised access to the facility. In the event of a flooding event, the site will be inspected to identify any damage that may have taken place including tank inspections. No waste water will be discharged from the site. In the event of an emergency, all surface water drainage systems would be

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• failure of main services, for example power, steam or cooling water • checking the composition of effluents before their emission • vandalism and arson • operator error • accessibility of control equipment in emergency situations • extreme weather conditions, for example flooding or very high winds 3. You must assess the risk of accidents and their possible consequences. You can use our risk assessment 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? 4. The depth and type of accident risk assessment you carry out will depend on the characteristics of your facility and its location. The main factors to take into account are the: • scale and nature of the accident hazard presented by the facility and its activities		isolated through use of a shut off penstock valves to prevent water release to storm sewer. Firewater will be managed in accordance with the site's Fire Prevention Plan. N+P operate in accordance with a Fire Prevention Plan which is compliant with the EA's Fire Prevention Plan guidance and meets the relevant sections within this appropriate measure. The Fire Prevention Plan is provided within Annex G – Fire Prevention Plan of this application. The site has a dedicated spill procedure in place which ensures that in the event of a spillage, no contamination enters watercourse, sewers or the land. N+P keep record of any accidents, incidents, near misses, changes to procedures, abnormal events and the findings of any maintenance inspections. Investigations will be carried out where appropriates and the EA will be contacted immediately if any event takes place that may cause significant pollution.

• risks to areas of population and the environment (the receptors) 5. Through your accident management plan, you must also identify the roles and responsibilities of the staff involved in managing accidents. You must provide them with clear guidance on how to manage each accident scenario, for example as a result of a spillage of a potentially polluting liquid. 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. 7. You must train your employees so they can perform their duties effectively and safely and know how to respond to an emergency. 8. You must also: • show how you will communicate with relevant authorities, emergency services and neighbours (as appropriate) before, during and after an accident • implement emergency procedures, including for safe plant shutdown and site evacuation • implement post-accident procedures that include carrying out an assessment of the harm an accident may have caused and the remediation actions you will take • consider the impact of accidents on the function and integrity of plant and equipment		

• have contingency plans to relocate or remove waste from the facility, and suspend incoming waste • test the accident management plan by carrying out emergency drills and exercises 9. After a flooding event you must inspect and assess the integrity of affected plant and equipment, in particular infrastructure that may have been in contact with floodwater or groundwater. Tank inspections should include non-destructive testing methods to verify their integrity. 10. You must take the following measures, where appropriate, to prevent events that may lead to an accident. You must have appropriate procedures set out in your accident management plan. <u>Preventing accidental emissions</u> 11. You must make sure that you contain the following (where appropriate) and route to the effluent system (where necessary and lawful): • process waters • site drainage waters • emergency firefighting water • chemically contaminated waters • spillages 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 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. 14. You must implement spill contingency procedures to minimise the risk of an accidental spill entering watercourses or sewers or contaminating land. 15. You must take account of additional firefighting water flows or firefighting foams, as set out in our fire prevention guidance. You may need infrastructure like emergency storage lagoons to prevent contaminated firefighting water from reaching a receiving water body. 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		

Security measures You must have security measures (including staff) to prevent unauthorised access to your facility, so preventing: • damage to equipment • theft • illicit dumping and fly-tipping • arson 17. Depending on your risk assessment, facilities must use an appropriate combination of: • security guards • total enclosure (usually with fences) • controlled entry points • lighting • warning signs • 24 hour surveillance, such as CCTV Fire prevention 18. If your permit allows you to store or treat combustible waste, you must have a fire prevention plan that meets the requirements of our guidance. Other accident prevention measures 19. You must maintain plant control in an emergency using one or a combination of: • alarms • trips and interlocks		

- automatic control systems
- tank level readings such as ultrasonic gauges, high level warnings, process interlocks and process parameters

20. You must:

- make sure that all the measurement and control devices you would need in an emergency are easy to access and operate in an emergency situation
- maintain plant in a good state through a preventive maintenance programme and a control and testing programme
- use techniques such as suitable barriers to prevent moving vehicles damaging equipment
- implement procedures to avoid incidents due to poor communication between operating staff – during shift changes and following maintenance or other engineering work

<u>Record keeping and procedures</u>

21. You must:

- keep an up to date record of all accidents, incidents, near misses, changes to procedures, abnormal events, and the findings of maintenance inspections
- carry out investigations into accidents, incidents, near misses and abnormal events and record the steps taken to prevent their reoccurrence
- maintain an inventory of substances which are present (or likely to be) and which could have environmental consequences if they escape

22. You must notify the Environment Agency without delay if you detect any of the following events and they are causing, or may cause, significant pollution: • a malfunction • a breakdown or failure • an accident • emission of a substance not controlled by an emissions limit • breach of an emissions limit		
2.4 Contingency plan and procedures		
1. You must implement a contingency plan so that you: • comply with all of your permit conditions and operating procedures during maintenance or shutdown at your facility, including disruption at other facilities that would affect supplies to your facility or the removal of waste from it • do not exceed limits in your permit and continue to apply appropriate measures for storing and handling waste • stop accepting waste unless you have a clearly defined method of recovery or disposal and enough permitted capacity 2. You must have contingency procedures to make sure that, as far as possible, you know in advance about any planned shutdowns at waste management facilities to which you send waste.		Contingency plans are in place as part of the site's IMS and meet the relevant requirements of the appropriate measures. This includes: • Knowing in advance about any planned shutdowns at facilities that waste is sent to; • Regular customers being aware of any circumstances in which N+P would stop accepting waste from them; • If other companies that N+P work closely with can accept waste on short notice. The site will operate under strict compliance with the permit limits and conditions. If the permit limits are likely to become exceeded, the contingency plan will be implemented.

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. 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 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. 6. You must not include unauthorised capacity in your contingency plan. If your contingency plan includes using temporary storage for additional waste at your facility, then you must make sure that your facility is authorised for this storage and you have the appropriate infrastructure in place. <u>Contingency measures for treatment only</u> 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 8. If you produce an end-of-waste material, your contingency planning must consider storage capacity for end-of-waste products and materials that fail the end-of-waste specification. 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 Facility Decommissioning

1. You must consider the decommissioning of the facility at the design stage and make suitable plans to minimise risks during decommissioning. 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	YES	All decommissioning undertaken on site will be undertaken in accordance with a detailed decommissioning plan and associated procedures. The sites Site Condition Report will also be updated to reflect any decommissioning activities undertaken on site.

• 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 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 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. 5. You should follow our guidance on how land and groundwater should be protected at permitted facilities. You should plan for producing a site condition report, if needed to surrender your permit.		
3.Waste pre-acceptance, acceptance and tracking		
3.1 Waste pre-acceptance		
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 that the waste is technically and legally suitable for your facility. If you accept the waste, you must keep records to justify your decision. Your pre-acceptance procedures must follow a risk-based approach, considering:	YES	All incoming waste is subject to pre-acceptance checks in accordance with the sites pre-acceptance procedure which meets the necessary requirements of the appropriate measures guidance.

• the source and nature of the waste • potential risks to process safety, occupational safety and the environment (for example from odour and other emissions) • knowledge about the previous waste holder(s) 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. 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. 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. 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		All pre-acceptance checks are carried out in accordance with this guidance.

• 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. 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.		

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. 8. Analysis of samples must be carried out by laboratories who are UKAS or MCERTs accredited for the prescribed test. 9. After a waste has been properly assessed and classified, you must technically assess the waste's suitability for storage and treatment at your facility to make sure you can meet your permit conditions. You must make sure that the waste complies with your facility's treatment capabilities and you are permitted to take that waste. 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. 11. You must reassess the information required at pre-acceptance if the: • waste changes • process giving rise to the waste changes • waste received does not to conform to the pre-acceptance information		

In all cases you must reassess the information required at pre-acceptance on an annual basis. 12. When you agree that you will accept waste from a customer, you should decide and record what parameters you will check at the acceptance stage. The checks could be visual, physical, chemical and odour-based parameters. You must also record the criteria for non-conformance or rejection. The person checking the waste for acceptance can also decide on their own additional parameters.		

3.2 Waste Acceptance

1. You must implement waste acceptance procedures to check that the characteristics of the waste received matches the information provided to you during waste pre-acceptance. This is to confirm the waste is as expected and that you can accept it. If the waste does not conform to the pre-acceptance information, you may still be able to accept the waste, but you must confirm first that your permit allows it and that your facility can handle it appropriately. Otherwise, you must reject the waste. 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)	YES	All incoming waste is subject to waste acceptance checks in accordance with the sites dedicated waste acceptance procedure which meets the necessary requirements of the appropriate measures guidance. The SRF produced by the proposed new plant will be derived from clean Dry Mixed Recycling (DMR) which is a product from the existing activities on site. No additional wastes will be accepted by the site as a result of the new plant. The site will continue to operate under strict compliance with the permitted waste types, limits and conditions. A full list of the EWC codes accepted on site are provided within the Application Support Document for this application.

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. 4. You must visually check wastes and verify them against pre-acceptance information and transfer documentation before you accept them on site. The extent of the initial visual check is based on the waste type and how it is packaged. 5. You must check and validate all transfer documentation and resolve discrepancies before you accept the waste. If you believe the incoming waste classification or description is incorrect or incomplete, then you must address this with the original waste producer or waste carrier (or both) during waste acceptance. You must record any non-conformance. If you have assessed the waste as acceptable for on-site storage or treatment, you must document this. 6. You must have clear criteria that you use to identify non-conforming wastes and wastes to be rejected. You must also have written procedures for recording, reporting and tracking non-conforming and rejected wastes. These must include: • using quarantine storage • notifying the relevant customer or waste producer • recording a summary of your justification for accepting non-conforming waste in your electronic (or equivalent) system		

You must take measures to prevent the recurrence of non-conforming and rejected wastes. 7. Where you reject waste which has been classified as hazardous, you must follow the procedure set out in our rejected loads guidance. 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. 9. The person carrying out waste acceptance checks must be trained to effectively identify and manage any non-conformances in the loads received, so you comply with your Duty of Care for waste and your permit conditions. 10. Your procedures must make sure that your staff watch waste being unloaded, so you can quarantine the waste if necessary before it is mixed with other material. 11. Offloading and reception areas must have an impermeable surface with self-contained drainage, to prevent any potentially polluting liquid from escaping off site. This requirement does not apply if your facility's		

permit allows only inert wastes and does not require impermeable surfacing with self-contained drainage.		

3.3 Quarantine

1. Your facility must have a dedicated waste quarantine area or areas which you use to temporarily store waste being rejected, or non-conforming waste whilst it is being assessed. Quarantine areas must have impermeable surface with self-contained drainage if there is a risk of contaminated runoff from the quarantined waste. 2. Where there is a risk of fugitive emissions from quarantined waste you must store it in closed or covered containers or within a building. 3. Quarantine storage must be separate from all other storage and clearly marked as a quarantine area. 4. You should store the waste in quarantine in closed containers or cover it to prevent emissions if appropriate. For example, you should sheet quarantined contaminated soil or store it in a covered skip to prevent rainfall or wind from mobilising pollutants. 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.	YES	The site benefits from both a dedicated and flexible quarantine area that combined can hold half of the largest stockpile as required by EA guidance. Although the flexible quarantine area may be subject to vehicular traffic during general operations, it will be cleared as necessary in the event of a fire. Having both dedicated and flexible quarantine areas provides N+P with flexibility during a fire event. In the event of non-compliant waste being identified within the waste load, the vehicle will be requested to remove the load off site immediately. If the vehicle has already unloaded the waste, it will be moved to the dedicated quarantine area and removed off site within 72 hours. In the event of a fire, with best endeavours, the burnt waste will be removed off site within 24 hours if safe to do so.

3.4 Waste Tracking

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. 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	YES	The site operates a computerised waste tracking system which meets the requirements detailed within the appropriate measures. The system ensures that no storge or process capacities are breached. The system records all information during the waste pre-acceptance, acceptance and rejection procedures. The system is used as a waste inventory and stock control system. All records will be kept for a minimum of 2 years.

• 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. 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 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.		

5. You must store back-up copies of records off site. These records must be readily accessible in an emergency. 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.		
4.0 Waste Storage		
1. You must have waste storage and handling procedures. You must store and handle waste in a way that makes sure you prevent and minimise pollution risks by using appropriate measures. 2. You must store waste in locations that minimise the unnecessary handling of waste. 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. Where possible, you should locate storage areas away from watercourses and sensitive perimeters, for example those close to public rights of way, housing or schools. You must store all waste within the security protected area of your facility to prevent unauthorised access and vandalism.	YES	All waste is handled and stored in accordance with the details provided within the permit variation document and in accordance with the sites the IMS to minimise pollution risk at all opportunities. All storage takes place in dedicated storage areas and is managed in accordance with the sites Operations, Development & Management Plan, Fire Prevention Plan and Litter and Dust Management Plan. All SRF bales will be removed in date order and will be securely wrapped to prevent water entering, access by pests and odour release. Although due to the waste types, pests and odour are unlikely. The bales will be inspected regularly and managed in accordance with the sites Fire Prevention Plan.

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 6. You should clearly mark all waste storage areas and provide signs indicating the type of waste stored there. 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 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. 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.		All storage areas and infrastructure are inspected regularly in accordance with the sites Operations, Development & Management Plan. All storage is carried out in accordance with the appropriate measures guidance.

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. 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. 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 13. You must inspect storage areas, containers and infrastructure regularly to make sure there is no loss of containment. You must deal with any issues immediately. You must keep written records of the inspections. You must clean up and log any spillages of waste.		

4.1 Segregation

1. You should keep different types of waste segregated if contamination would inhibit the recovery of the waste. 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.	YES	All storage will take place in dedicated storage areas and is managed in accordance with the sites Fire Prevention Plan and Litter and Dust Management Plan. Wastes are separated via the processing equipment and are collected separately. No mixing takes place. All storage is carried out in accordance with the appropriate measures guidance.

5.0 Waste Treatment

1. Waste treatment must have a clear and defined benefit. You must fully understand, monitor and optimise your waste treatment process to make sure that you treat waste effectively and efficiently. The treated output material must meet your expectations and be suitable for its intended disposal or recovery route. You must identify and characterise emissions from the process and take appropriate measures to control them at source. 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	YES	Waste is checked and sorted in accordance with the site's waste pre-acceptance and acceptance procedures, which prevents unsuitable wastes being treated on site. Waste treatment processing is detailed within the Application Support Document and the sites Operations, Development & Management Plan. Control measures have been put in place to mitigate identified emissions and all storage is managed in accordance with the sites Fire Prevention Plan and Litter and Dust Management Plan.

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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. 3. You must have up-to-date written details of the measures you will take during abnormal operating conditions to make sure you continue to comply with permit conditions. Abnormal operating conditions include: • unexpected releases		Process flow diagrams are included as part of the Operations, Development & Management Plan and within Annex B of the permit application.

• start-up • momentary stoppages • shutdown		
5.1 Soils and Inert Wastes		
1. Soil and aggregate washing is a physico-chemical treatment (not a separation or sorting activity) and you must categorise the outputs as set out in WM3.	N/A	No soil and aggregate washing takes place on site.
5.2 Waste Treatment outputs, including fines		
1. You must not make assumptions about the nature of the outputs from your waste treatment processes. You must make sure that you appropriately classify the outputs following WM3 If you do not, you may breach your Duty of Care for waste and commit an offence under the Environmental Protection Act 1990. This is particularly important for fines arising from shredding and trommelling processes, which generally: • require disposal at cost • contain a range of contaminants • are likely to be subject to a mirror entry code in the LoW, for example 19 12 11* versus 19 12 12 2. Any hazardous waste taken from your facility must be consigned following our guidance Dispose of hazardous waste.	YES	Waste treatment outputs are limited to recyclables and SRF baled material. No hazardous waste is accepted on site. WM3 assessments will be carried out if necessary. Waste outputs have not met end-of-waste criteria.

3. If an output is not waste, for example because end-of-waste criteria have been met, or the material has been produced in accordance with a Quality Protocol (resource framework), then you do not need to store the output within your permitted area. However, non-waste materials are still able to cause pollution, for which you remain liable. You must implement appropriate measures to prevent and minimise risks of pollution from non-waste and waste materials.		
5.3 Waste Treatment for Landfill		
1. If you are handling or treating waste before you send it to landfill follow our guidance Dispose of waste to landfill.	N/A	The purpose of the recycling activities carried out on site is to reduce the quantity of waste sent for disposal. No waste is handled or treated for disposal to landfill.
6.0 Emissions Control		
1. You must identify, characterise and control emissions from your activities that may cause pollution.	YES	All identified emissions and mitigation measures are detailed with the permit application documentation, Environmental Risk Assessment and associated management plans. The site currently has no point source emissions to air and none will be added as part of this permit variation application. To ensure any potential dust and litter emissions are controlled on site, a Dust and Litter Management Plan has been produced. There are no emissions to land as a result of this permit variation.

		There are no process emissions to controlled waters as a result of this permit variation. The drainage system will be updated to capture the runoff from the proposed new storage area. The remaining drainage network on site will remain as currently permitted, with two surface water emission points (Emission Point W1 and W2). The site has an existing connection to main foul sewer, consented via a Trade Effluent Discharge Consent. This captures surface water run-off from the areas north and west of the Baler Shed which flows to a below ground chamber before being pumped to foul sewer (Emission Point S1). There will be no changes to emissions to sewer as a result of this permit variation.

6.1 Enclosure within buildings

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. 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.	YES	The majority of waste treatment activities and storage of loose waste is conducted within an enclosed building. Low emission risk material such as baled waste is stored externally as currently permitted. The following measures are implemented for the waste treatment processes: • Enclosure of existing processing activities in the mini MRF building and plastic processing plant building;

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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.

4. Material transfer and storage systems and equipment (for example conveyors, hoppers, containers and tanks) can extend outside the enclosed building so long as they are also fully enclosed.

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. Enclosed buildings must be ventilated to provide a safe working environment for employees. Your building's ventilation system must be

- Enclosure of the majority of the proposed SRF treatment process in the existing mini MRF building;
- Selection of high-integrity equipment where possible;
- Enclosure of external conveyors to prevent emissions of litter or dust;
- The proposed SRF plant is designed to ensure the drop heights into the feed hoppers are minimised;
- Drop heights of material are minimised as part of existing operations on site;
- Partial enclosure of the two proposed feed hoppers (one hopper for the recycled residual sub 50mm material and one hopper for the recycled residual >150mm material) using a steel frame and steel cladding to minimise material escape;
- Regular inspections of building integrity; and
- Once the proposed SRF plant is operational, additional controls measures will be considered such as dampening with a mist or fogging system.

Due to the waste types that are treated on site, it is not required that the buildings are maintained under negative pressure. The necessary part of the process that may cause emissions are enclosed.

The existing waste stream accepted on site (mixed recyclable waste, plastic waste, glass, metals and paper and cardboard) are not dusty wastes and will not create emissions to air of dust.

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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

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

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.

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

The SRF produced by the proposed new plant will be derived from clean Dry Mixed Recycling (DMR) which is a product from the existing activities on site. No additional wastes will be accepted by the site as a result of the new plant. This material is not dusty however there is a risk of litter.

Due to the nature of the incoming waste, namely devoid of food or organic fines, there is a very low potential for odour generation through the site activities.

Given the context of the sites environmental setting, the impact of the variation will not result in any material increases in site noise emissions. The majority of the proposed equipment will be enclosed within the existing mini MRF building. The existing processing activities on site are undertaken within the existing buildings on site. The site does not have any history of any environmental noise or amenity complaints and is not considered sensitive in this regard. Therefore acoustic seals on doors and windows are not deemed necessary.

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. 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.		
6.2 Point Source Emissions to Air (channelled emissions)		
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. 2. You must make an assessment of the fate and impact of the substances emitted to air, following the Environment Agency's risk assessment guidance. 3. To reduce point source emissions to air (for example dust and odorous compounds) from the treatment of waste, you must use an appropriate	N/A	The site currently has no point source emissions to air and none will be added as part of this permit variation application. To ensure any potential dust and litter emissions are controlled on site, a Dust and Litter Management Plan has been produced.

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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) 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 to establish whether the height of the vent or stack allows emissions to disperse appropriately, preventing any impacts on receptors. 5. Where monitoring is required, including for odour, you must install suitable monitoring points which meet the sampling standard for the relevant pollutants. 6. You must have procedures to make sure that you correctly operate, monitor and maintain abatement equipment. 7. Your monitoring should demonstrate the effectiveness of the abatement, so that you can take preventative or corrective action as necessary.		

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. 9. You should design and operate abatement systems to minimise water vapour plumes.		

6.3 Fugitive Emissions to Air

1. You must use appropriate measures to prevent and minimise fugitive emissions to air, including dust, mud and litter, odour and noise and vibration. 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	YES	The site operates in accordance with the sites waste pre-acceptance and acceptance procedures detailed within the IMS. All appropriate measures to prevent and minimise fugitive emissions are described within the Application Support Document. The Environmental Risk Assessment also addresses emissions to air including dust, mud, litter, odour and noise and vibration and any mitigation measures that are implemented on site. The site has a regular maintenance and inspection programme in place as part of the IMS to prevent and reduce the potential for fugitive emissions to air. The majority of waste treatment activities and storage of loose waste is conducted within an enclosed building.

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- 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

3. You must have an appropriate, regular maintenance programme covering all buildings, plant and equipment. It must help prevent emissions or minimise them. Your maintenance programme must include:

- a leak detection and repair programme to promptly identify and mitigate any fugitive emissions of organic compounds from treatment plant and associated infrastructure (for example, pipework, conveyors or tanks)
- regular inspection and cleaning of all waste storage and treatment areas and equipment (including conveyor belts) to avoid large scale contamination activities
- preventing plant and equipment from corroding (for example, conveyors or pipes) – including selecting and using appropriate construction materials, and lining or coating equipment with corrosion inhibitors

4. You should monitor and log weather conditions – temperature, wind speed and direction, and describe any precipitation (for example none, drizzle, heavy rain, snow). You can use this information to identify when

Low emission risk material such as baled waste is stored externally as currently permitted.

<u>Other measures for dust, mud and litter</u>

Due to the types of waste that the existing activities on site handle, dust is not an issue on site. The existing waste stream accepted on site (mixed recyclable waste, plastic waste, glass, metals and paper and cardboard) are not dusty wastes and will not create emissions to air of dust. The SRF produced by the proposed new plant will be derived from clean Dry Mixed Recycling (DMR) which is a product from the existing activities on site. No additional wastes will be accepted by the site as a result of the new plant.

N+P will implement the following measures to reduce the potential of dust, mud and litter generated on site:

- Enclosure of the existing processing activities in the mini MRF building and plastic processing plant building.
- The majority of the SRF treatment process in the existing mini MRF building will be enclosed.
- External conveyors will be enclosed to prevent emissions of litter or dust.
- The plant is designed to ensure the drop heights into the feed hoppers are minimised.
- Partial enclosure of the two feed hoppers (one hopper for the recycled residual sub 50mm material and one hopper

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dispersion conditions are poor (that is, periods of warm, calm weather with wind blowing towards sensitive receptors). You can also use it to inform decisions to implement additional short-term pollution control contingency measures. If you have a weather station you should position it carefully, for example not placing it in between buildings. There is guidance in the World Meteorological Organization's Guide to Meteorological Instruments and Methods of Observation.

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.

Other measures for dust, mud and litter

6. If your activities are likely to produce dust and particulates, mud or litter that could cause pollution at sensitive receptors, or if such pollution has been substantiated, you must implement and regularly review a dust, mud and litter management plan. You must do this following our guidance. Your dust, mud and litter management plan must explain how you will prevent and minimise emissions of dust, mud and litter from your facility.

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.

for the recycled residual >150mm material) using a steel frame and steel cladding to minimise material escape.

- Daily cleaning schedule to prevent dust and litter escape from the hoppers which includes the site and equipment is cleaned twice on each 12 hour shift. A 30 min clean is undertaken within the first half of the shift and an hour long clean towards the end of the shift.
- Road sweeper utilised on site and operational each morning and additionally throughout a shift if required.
- Daily visual inspections to ensure that any potential diffuse / litter emissions are identified and action taken to prevent reoccurrence.
- A dedicated site operative (already employed) will complete site inspections to ensure litter is retrieved and prevented from escaping the site boundary.
- Vehicle speeds will not exceed 10mph on site which is a recognised method of controlling dust.
- All incoming / departing loads are appropriately sheeted or tipped in designated areas.
- Site drainage, containment systems and associated infrastructure is regularly cleared and maintained as required to ensure they are working correctly.

The facility will not give rise to reasonable cause for annoyance. In the unlikely event of any complaints, these will be dealt with in accordance with the sites complaints procedures.

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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. <u>Other measures for odour</u> 9. If your activities are likely to produce odour pollution at sensitive receptors, or such pollution has been substantiated, you must implement and regularly review an odour management plan following our guidance, which includes odour management: comply with your environmental permit. Your odour management plan must explain how you will prevent and minimise odorous emissions from your facility. 10. You must reject waste that is highly odorous as part of your pre-acceptance and waste acceptance procedures. This is unless you can handle and treat these wastes within an enclosed building with appropriate odour control measures, including extraction via odour abatement. Otherwise, you should talk to the waste supplier to stop it happening again. You should avoid receiving aged waste, for example by		The site will operate in accordance with the Litter and Dust Management Plan. <u>Other measures for odour</u> Due to the nature of the incoming waste, namely devoid of food or organic fines, there is a very low potential for odour generation through the site activities. The site has stringent waste pre acceptance and acceptance procedures which will ensure that no excessively odorous waste are accepted onto site. In the unlikely event that potentially odorous waste loads are accepted on site, they will be immediately rejected upon arrival in accordance with the sites waste rejection procedures. Should any odorous waste be mistakenly accepted, it will be transferred to the quarantine area and removed at the earliest opportunity Odour on site is assessed during the daily site inspection and recorded in the daily site log. <u>Other measures for noise and vibration</u> Given the context of the sites environmental setting, the impact of the variation will not result in any material increases in site noise emissions. The majority of the proposed equipment will be enclosed within the existing mini MRF building. The existing processing activities on site are undertaken within the existing buildings on site.

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refusing to accept waste from other transfer stations that do not have strict inventory controls and documented holding times. 11. You must make sure that odorous waste arrives at and leaves your facility in covered or enclosed vehicles. Mesh covers are not adequate to control odour. You should minimise how long potentially odorous waste is kept at your facility, in particular under anaerobic conditions. Making smaller stockpiles increases natural aeration, reducing the risk of anaerobic biodegradation which can cause odour. 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. 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. 14. You must cover odorous or potentially odorous waters or liquids or keep them in enclosed tanks or containers. 15. Using masking agents (for example dry nano systems, ozone systems and ionisation systems) is a way of attempting to disguise an odour problem. If you understand and process wastes efficiently then you will		The site has a number of large industrial neighbours, major trunk roads (A206) and nearby railway lines, and does not have any sensitive residential and habitat receptors located in the near vicinity of the facility. The site does not have any history of any environmental noise or amenity complaints and is not considered sensitive in this regard. Therefore a noise and vibration management plan is not considered a requirement for the site. N+P implement the following measures to mitigate any potential noise emissions: • Appropriate location of equipment and buildings; • Planned preventative maintenance; • Equipment is operated by trained and experienced staff; • Site operational times are adhered to; and • White noise reversing alarms are utilised where necessary.

not need to use masking agents. We do not consider this technology an appropriate measure. Other measures for noise and vibration 16. If your activities are likely to produce noise or vibration pollution at sensitive receptors, or such pollution has been substantiated, you must implement and regularly review a noise and vibration management plan. Follow our guidance H3 part 2 noise assessment and control. Your noise and vibration management plan must explain how you will prevent and minimise emissions of noise and vibration from your facility. 17. For noise, your noise and vibration management plan must be informed by a noise impact assessment carried out following the methodology of BS 4142:2014+A1:2019 'Methods for rating and assessing industrial and commercial sound'. 18. For vibration, your noise and vibration management plan must be informed by a vibration impact assessment carried out following the methodology of BS 6472-1:2008 'Guide to evaluation of human exposure to vibration in buildings. Vibration sources other than blasting'.		

6.4 Point source Emissions to Water (including sewer)

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.	YES	There are no process emissions to controlled waters as a result of this permit variation. The drainage system will be updated to capture the runoff from the proposed new storage area.

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2. You must assess the fate and impact of the substances emitted to water and sewer following the Environment Agency's risk assessment guidance.

3. Discharges to water or sewer must comply with the conditions of an environmental permit and a trade effluent consent.

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.

5. You must segregate uncontaminated water streams (for example clean runoff from roofs) from those that require treatment.

The remaining drainage network on site will remain as currently permitted, with two surface water emission points (Emission Point W1 and W2). The surface water drainage system is equipped with a three stage (Class 1) interceptor to enable the removal of solid and trace oil contamination prior to release to controlled waters. Both emission points are equipped with isolation valves with Emission Point W2 permanently closed.

Monthly sampling is undertaken at both emission points which includes the following parameters:

- pH;
- Ammoniacal Nitrogen;
- Suspended Solids;
- Chloride;
- BOD; and
- COD.

The site has an existing connection to main foul sewer, consented via a Trade Effluent Discharge Consent. This captures surface water run-off from the areas north and west of the Baler Shed which flows to a below ground chamber before being pumped to foul sewer (Emission Point S1).

There will be no changes to the emissions to sewer as a result of this permit variation.

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 Fugitive Emissions to Land and Water

1. You must use appropriate measures to control potential fugitive emissions and make sure that they do not cause pollution. See the guidance on emissions to water and leaks from containers. 2. You must design appropriate surfacing and containment or drainage facilities for all operational areas, taking into account: • collection capacities • surface thicknesses • strength and reinforcement • falls • materials of construction • permeability • resistance to chemical attack • inspection and maintenance procedures • relevant standards of construction • end use, for example by tracked or wheeled vehicles or vehicle weight 3. Your drainage infrastructure must: • prevent incompatible wastes coming into contact with each other	YES	The site has been designed to control potential fugitive emissions to land and water. All waste storage and treatment will take place on appropriately designed hardstanding with contained drainage that meets CIRIA guidance. Any tanks are appropriately bunded and meet CIRIA guidance. The only subsurface infrastructure on site relates to the site drainage system which is inspected and maintained as part of the sites maintenance and inspection programme. Both emission points are equipped with isolation valves with Emission Point W2 permanently closed. The site has a dedicated spillage procedure that will be implemented in the event of a spillage. All staff are trained to respond in the event of a spill on site.

• make sure that fire cannot spread 4. You must store and treat all waste on an impermeable surface with contained drainage that meets CIRIA 736 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. 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 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. 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. 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 8. You must provide secondary containment that meets CIRIA 736, 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 9. You must comply with the oil storage regulations. These apply to non-hazardous wastes such as vegetable and cooking oil, as well as to biofuels and mineral oils. 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. 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 12. You must produce and implement a spillage response plan and train staff to follow it and test it. 13. Your procedures and associated training must make sure you deal with spillages immediately. You should follow the manufacturer's health and safety advice for any products or substances involved. 14. You must keep spill kits at locations close to areas where a spillage could occur and make sure relevant staff know how to use them. You must make sure kits are replenished after use. 15. You must stop spillages from entering drains, channels, gullies, watercourses and unmade ground. You must make available proprietary sorbent materials, sand, booms or drain mats for use when required.		

16. You must make sure your spillage response plan includes information about how to recover, handle and correctly dispose of waste produced from a spillage. 17. You must have a documented inspection and maintenance programme for impermeable surfaces and containment facilities and keep records to demonstrate its implementation.		

6.6 Pests

1. You must manage waste in a way that prevents pests. For example, if you do not manage flies, rats and birds they can affect operations, be a nuisance to neighbours and pose an environmental and health hazard as a potential vector for pathogens. We have produced internal guidance for our officers on fly management. Contact us if you would like a copy. 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, following our guidance. 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	YES	Due to the proposed wastes stored and processed on site, pests are not likely to be a problem on site. The site will employ commercially available products and services to control pests if deemed necessary. The site is inspected weekly for the presence of pests which is recorded in the daily log should any activity be revealed. A specialist contractor will visit the site periodically which will be recorded in the pest control log. A Pest Management Plan is not considered necessary due to the proposed wastes accepted on site and site operations.

• storing, handling and using approved pest control products – you can get information on using chemicals at work from the Health and Safety Executive		

7.Emissions Monitoring and Limits

7.1 Emissions to Air

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 is available. 2. You must monitor fugitive emissions of dust and particulates if they are likely to cause pollution at sensitive receptors, or if this has been substantiated. There is guidance on developing monitoring strategies for assessing levels of pollutants in the ambient atmosphere and monitoring particulate matter in ambient air around waste facilities. 3. You must describe your monitoring programme in your dust management plan. Visual monitoring is not effective for assessing the risk of emissions of fine particulates, for example PM10. You should use dust and particulate monitors with trigger alarms instead.	YES	The site currently has no point source emissions to air and none will be added as part of this permit variation application. Due to the types of waste that the existing activities on site handle, dust is not an issue on site. The existing waste stream accepted on site (mixed recyclable waste, plastic waste, glass, metals and paper and cardboard) are not dusty wastes and will not create emissions to air of dust. The SRF produced by the proposed new plant will be derived from clean Dry Mixed Recycling (DMR) which is a product from the existing activities on site. No additional wastes will be accepted by the site as a result of the new plant. Monitoring for fugitive emissions to air will be carried out in accordance with the sites Litter and Dust Management Plan. This will consist of ongoing meteorological condition monitoring and daily site inspections. Further monitoring will be implemented if deemed necessary.

You should set alarm trigger levels to alert site staff when short-term particulate concentrations are elevated, so that you can review site practices or increase your mitigation measures. When combined with weather data, dust and particulate monitors can also provide evidence to demonstrate that your facility is not the cause of complaints. You should use a particulate limit of 75 µg/m3 to100 µg/m3 (over a 5 minute average) for PM10 as an initial trigger for action, and reduce this after the system has been in place for some time.		
7.2 Medium Combustion Plant Directive		
1. If you operate medium combustion plant or specified generators you must monitor your emissions following the Environment Agency guidance on Monitoring stack emissions: low risk MCPs and specified generators and maintain a record of the type and quantity of fuel used in the plant. 2. If you have a generator that uses natural gas, for example in a boiler, you must comply with the specified generator regulations. 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. 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.	N/A	Not applicable to sire operations. There are no medium combustion plants on site.

7.3 Emissions to Water and Sewer

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) 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	YES	The majority of the drainage network on site will remain as currently permitted, however it will be updated to capture the runoff from the proposed new storage area which is currently undergoing design. Surface water run-off from areas north and west of the Baler Shed located in the centre of the site flow to a below ground chamber before being pumped to foul sewer (Emission Point S1). Emissions to foul sewer via Emission Point S1 will be managed and monitored in accordance with the sites effluent discharge consent (Ref: TLOR0C13). The site also has two surface water emission point (Emission Point W1 and W2). The surface water drainage system is equipped with a three stage (Class 1) interceptor to enable the removal of solid and trace oil contamination prior to release to controlled waters. Both emission points are equipped with isolation valves with Emission Point W2 permanently closed. Monthly sampling is undertaken at both emission points which includes the following parameters: • pH; • Ammoniacal Nitrogen; • Suspended Solids; • Chloride; • BOD; and

		• COD. The site surface water drainage system has been designed to be fully isolated to avoid the release of any potentially contaminated water from leaving the site in the event of a major incident, fire or emergency. There are no potentially polluting releases to controlled waters during normal operations.
8.0 Process Efficiency Appropriate Measures		
1. 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	YES	N+P review their annual quantity of water, energy, raw materials and residues and waste water produced from operations on site. This is part of the sites IMS and is reviewed annually.
8.1 Energy Efficiency (installations only)		
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	YES	Energy required by the site is imported in the form of electricity from the National Grid. There are no other energy requirements on site. A review of the sites energy efficiency is undertaken annually as part of the IMS. The review recommends practicable measures for improving energy efficiency and specifies a maximum period for actions to be undertaken.

APPROPRIATE MEASURES ASSESSMENT

2. You must regularly review and update your energy efficiency plan as part of your facility's management system. 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. 4. You must regularly review and update your energy balance record as part of your facility's management system, alongside the energy efficiency plan. 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		All plant and equipment has been chosen both on ability to perform and on its energy efficiency. N+P have an operation and maintenance programme in place to undertaken routine inspections and checks. Plant is monitored to ensure that no plant is operating ineffectively leading to the loss of energy. Regular maintenance takes place on site and any inefficient plant will be replaced. A record of fuel consumption is maintained to enable identification and analysis of changes in the efficiency of plant. This information is used to identify the need for additional maintenance or operator training. It will also be used in the annual energy review.

6. You must have measures in place to avoid gross energy inefficiencies. These should include for example: • insulation • containment methods (such as seals and self-closing doors) • avoiding unnecessary discharge of heated water or air (for example, by fitting simple control systems such as timers and sensors) 7. You should implement additional energy efficiency measures at the facility as appropriate, following our guidance.		

8.2 Raw Materials (installations only)

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. 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. 3. You must justify the continued use of any substance for which there is a less hazardous alternative. 4. You must have quality assurance procedures to control the content of raw materials.	YES	All materials utilised on site are recorded and a list maintained. Raw materials on site are limited to diesel and chemicals which is used within mobile plant. At present, it is not economically viable to substitute these materials with waste alternatives, however N+P will undertake annual reviews of the process and endeavour to utilise wastes where feasible.

8.3 Water Use (installations only)

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 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 3. You must carry out a regular review of water use (a water efficiency audit) at least every 4 years. 4. You must also: • produce flow diagrams and water mass balances for your activities	YES	There is no water used by the processes on site and therefore water consumption is low. The following measures are in place to reduce emissions to soil and water: • Impermeable Surfaces – all storage and treatment areas are constructed on impermeable concrete hardstanding. • Any storage tanks and vessels are installed with the necessary secondary containment to prevent any failures of storage vessels. • The only external activities relate to storage and waste transfer. The processing activities are located within buildings. • The site surface water drainage system has been designed to be fully isolated to avoid the release of any potentially contaminated water from leaving the site in the event of a major incident, fire or emergency. N+P review their annual quantity of water, energy, raw materials and residues and waste water produced from operations on site. This is part of the sites IMS and is reviewed annually.

• 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 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 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. 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. 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 9. You must directly measure fresh water consumption and record it regularly at every significant usage point, ideally every day.		
9.0 Waste Minimisation, Recovery and Disposal		
1. You must have and implement a residues management plan that: • minimises the generation of residues, that is solid waste arising from the treatment of waste • optimises the reuse, regeneration, recycling or energy recovery of residues, including packaging • makes sure you properly dispose of residues where recovery is technically or economically impractical 2. Where you must dispose of waste, you must carry out a detailed assessment identifying the best environmental options for waste disposal. You must review on a regular basis options for recovering and disposing of waste produced at the facility. You must do this as part of your management system to make sure that you are still using the best	YES	Section 2.3.12 of the BREF Waste Treatment guidance defines residues as the solid waste generated by treatment activities that is not directly related to the type of waste treated in the plant. There is no waste generated on site that is not directly related to the type of waste treated in the plant. Therefore, it is not believed that a residue management plan is appropriate for the site. The plastic wrap used for the proposed SRF bales is not processed or reused on site. It is used to protect the SRF material and then is ultimately processed / reused by the customer / receiving site. Any packaging on site that can be re-used will be, however minimal packaging is used. Waste is either stored loose or in bales (wrapped and non-wrapped).

environmental options and promoting the recovery of waste where technically and economically viable.		The purpose of the recycling activities carried out on site is to reduce the quantity of waste sent for disposal. All waste on site is monitored in accordance with the sites IMS.