

Technical Note:

Information to address Forward Actions for Permit Application EPR/YP3306MF/A001

1. Background and context

In October 2022, Britannia Refined Metals (BRM) (a subsidiary of Glencore) submitted an application for a Bespoke Installation Environmental Permit (Reference EPR/YP3306MF/A001) for activities comprising import, storage, treatment and export of specific waste electronic and electrical equipment, together with other wastes streams.

The new facility has 2 main purposes;

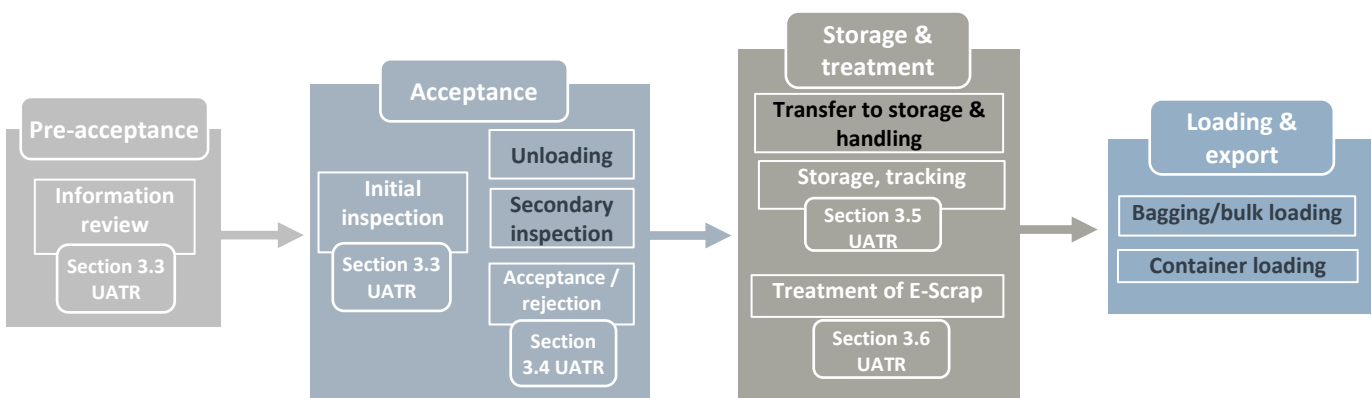
- Prepare representative samples of the E Scrap that can be tested in an off-site laboratory to form the basis of commercial agreements with suppliers; and
- Prepare E Scrap for offsite treatment and resource recovery.

As outlined in section 1.4 of the application, BRM agreed with the Environment Agency during pre-application discussions that, given the tension between the timescales for the determining the Environmental Permit application and the programme for the design of the facility and specifying equipment, the application would be submitted with the most reliable confirmed information at the time of submission. Acknowledging that at that time, information relating to a range of matters to be addressed to enable the application to be determined was at varying stages of maturity, the applicant agreed to provide further information prior to the application being duly made. This information was provided in updated Application Technical Report submitted to the Environment Agency in April 2023.

At this time, a number of matters, most notably control of dust emissions and arrangements for loading waste were not finalised. A Forward Action Plan is included at Appendix A of the Updated Application Technical Report, setting out steps to be taken to address outstanding information requirements. This report addresses these requirements.

Figure 1.1 outlines the information provided in this report (highlighted in black text) and confirms interfaces with information in the Updated Technical Report (highlighted in white text), based on sequencing of waste management activities at the facility.

Figure 1.1 References to information that interfaces with this report



It is considered the updated information included in this application does not materially alter information included in the non-technical summary of the Updated Application Technical Report for consultation purposes.

The forward actions addressed in this report and the locations at which the information can be found are summarised at Table 3.1.

Table 3.1 Forward Actions

Forward Action Reference	Requirement	Document Reference
FA 3.4.2	Outline arrangements to control fugitive dust emissions from the loading and unloading areas, including those entrained in vehicle tyres.	Section 2.3 and 3.3
FA 3.5.1	Confirm arrangements to control fugitive dust emissions associated with waste loading including bagging	Section 3.3
FA 3.5.2	Provide descriptions of regulated activities including waste transfer arrangements for bagging and bulk loading including environmental considerations taking into account in the design of these arrangements.	Section 2 and Section 3
FA 3.5.3	Confirm arrangements for storing and handling samples at the installation including timescales	Section 3
FA 3.5.4	Confirm arrangements for abating emissions to air including design of the waste loading and unloading areas and access and egress points to the main building	Section 2 and Section 3
FA 9.1.1	Confirm all point source emissions to air	Section 1, Figure 1.1
FA 10.4.1	Update the Environment Agency on engagement relating to noise emissions assessment as a result of the engagement with Kent County Council	Section 5

The forward actions coalesce around 3 key themes:

- Design of the waste reception area and control of dust emissions associated with unloading activities.
- Design of the container loading area and control of dust emissions associated with bagging and bulk loading of wastes.
- Engagement

On this basis, the document is structured as follows:

For ease of reference, **Section 2** (unloading, secondary inspection and transfer of wastes) incorporates, and updates information provided at Section 3.4 of the updated Application Technical Report. The content of this section is consistent with information provided in the updated report, though additional information is provided relating to:

- Contractual obligations imposed on waste suppliers, to ensure bulk consignments of waste are received in specific types of containers, to minimise dust emissions.
- Installation of gantries to enable enhanced inspection of wastes during unloading.

- Arrangements for control of dust emissions.

Section 3 of this report provides more extensive information relating to the bagging, loading and export of wastes, incorporating and updating information provided at Section 3.4, Section 3.5, in the updated Application Technical Report (wastes bagging, loading and export, process and emissions control) The content of this section is consistent with information provided in the updated report, with additional information relating to:

- Arrangements for conveying waste to the container loading area and more generally across the facility.
- Details of the options for bagging and bulk loading equipment and operations.
- Arrangements for control of dust emissions.

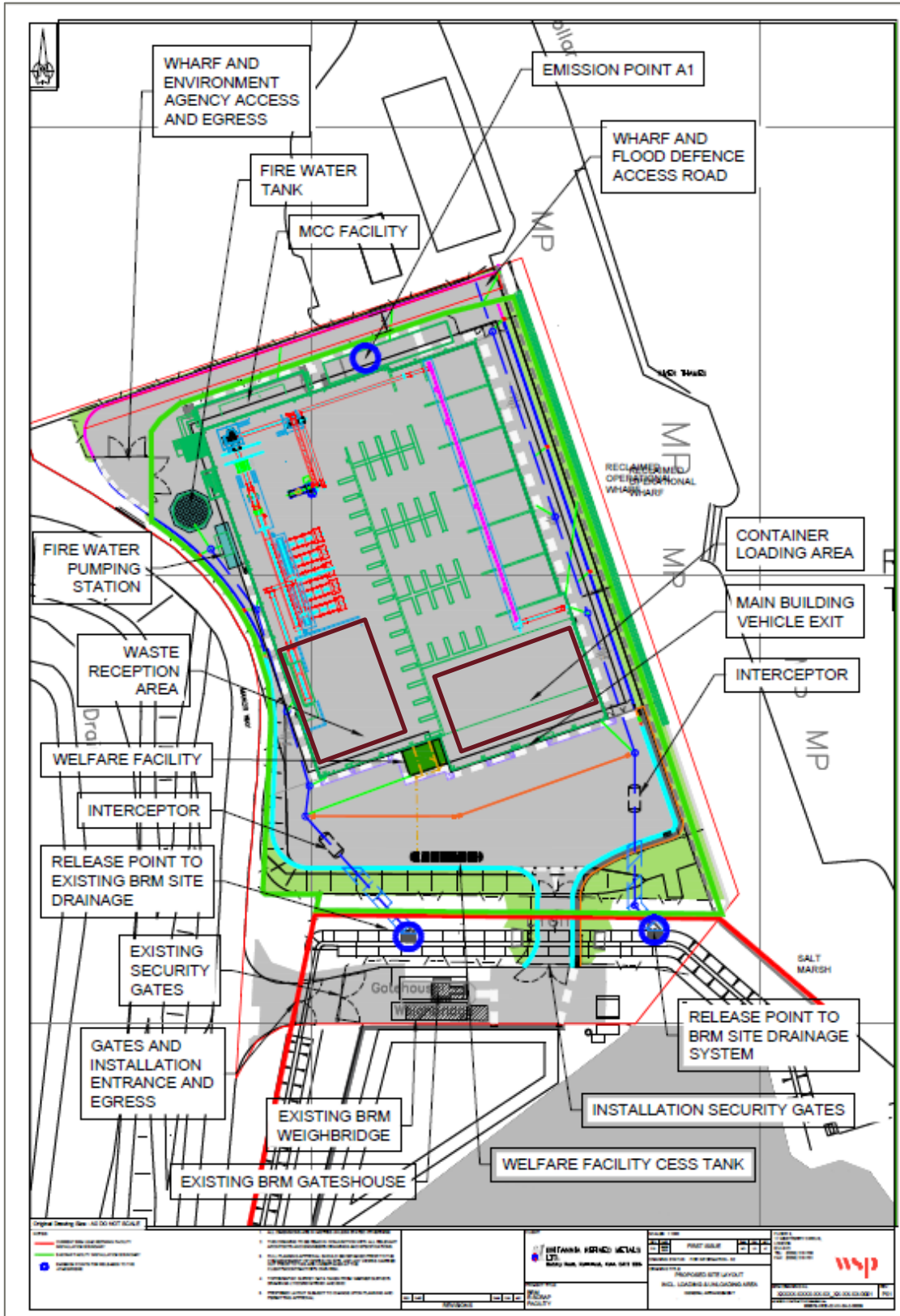
Section 4 of the report comprises the comparison of the arrangements outlined at Sections 2 and 3 with the Appropriate Measures and BAT requirements for ease of reference.

Section 5 provides details of stakeholders responses to Kent County Council in relation to the planning application for the E-Scrap facility.

The updated application report also acknowledges, issue of the Permit will not preclude further refinement of the design, on the basis confirmation of outstanding matters may be addressed by pre-operational conditions.

To inform understanding of the matters outlined in this document, the indicative internal and external layout of the installation is presented at Figure 1.1 below. Figure 1.1 also confirms the location of the single point source to air, Emission Point A1. Releases from Emission Point A1 comprise air extracted from processes associated with E-Scrap treatment and operational areas of the facility.

Figure 1.1 Indicative Site Layout including Waste Reception and Container Loading Areas



2. Waste Reception Area

Activities associated with unloading, secondary inspection and transfer of Simple Wastes (manufactured articles such as baled copper or wire looms), Complex Wastes (not suitable for visual inspection such as Incinerator Bottom Ash) and E-Scrap will be undertaken within the Waste Reception Area. Given the layout of the facility, this area will also be used to load onto vehicles quarantined wastes, wastes stored in bags and unbagged Simple Wastes. The location and layout of the Waste Reception Area is presented at Figures 1.1, 2.1 and 2.2.

Figure 2.1 Indicative layout of waste reception area in relation to internal arrangements

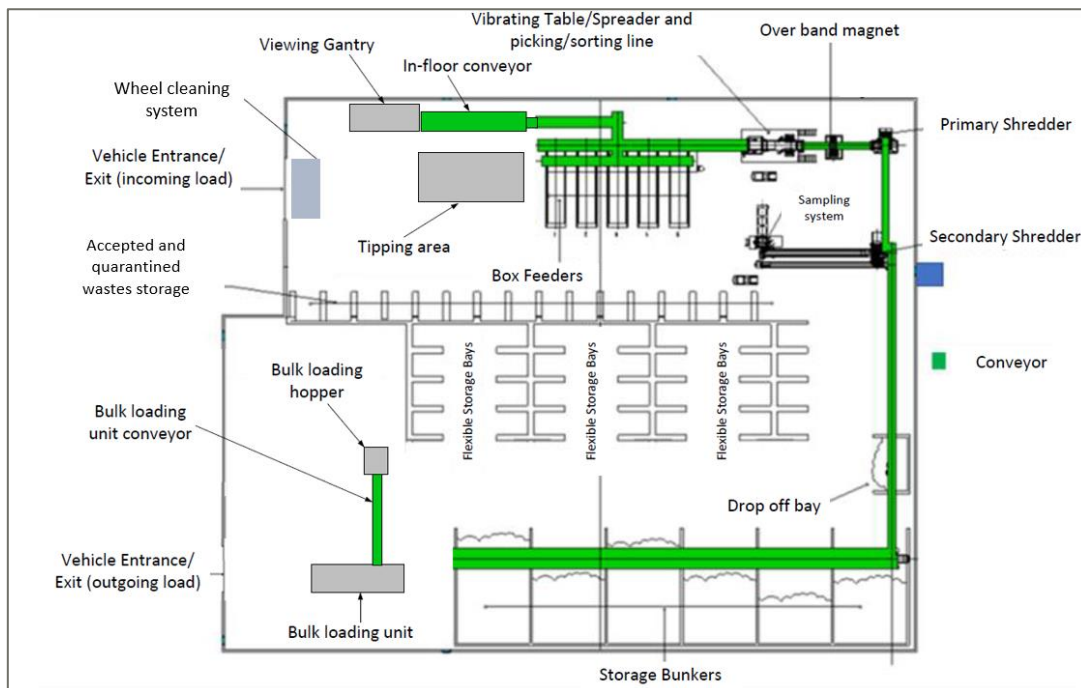


Figure 2.2 3D Image of Waste Reception Area and in floor conveyor



The Waste Reception Area is designed to provide an optimal working area for waste to be unloaded from vehicles in a manner that reduces dust emissions, to enhance secondary inspection of wastes, for ease of manoeuvrability of vehicles and to provide good visibility for operators within the area and vehicle drivers. The area will be founded on a sealed concrete slab with upstands, specified to maintain integrity taking into account the activities undertaken and the vehicles using this area.

Activities undertaken within the waste reception area are summarised at Figure 2.3, Figure 2.4 and Figure 2.5 below. These block flow diagrams confirm arrangements for unloading, secondary inspection and transfer of E-Scrap, Simple Wastes and Complex Wastes respectively. The diagrams also confirm the current proposals for managing dust emissions.

Activities and operations included in the block flow diagrams identifying activities for which dust control and/or abatement measures will be implemented have colour coded borders as below:

Key:

Green Border – extraction of air for abatement.

Red Border – misting system.

Yellow Border – misting system anticipated to be operated in atomiser mode.

Purple Border – dust will be contained in a sealed/closed loop system whilst material is being shredded.

This key is also applicable for block flow diagrams presented in Section 3 relating to bagging, bulk transfer and export of wastes.

Figure 2.3 Unloading, inspection and transfer of E-Scrap

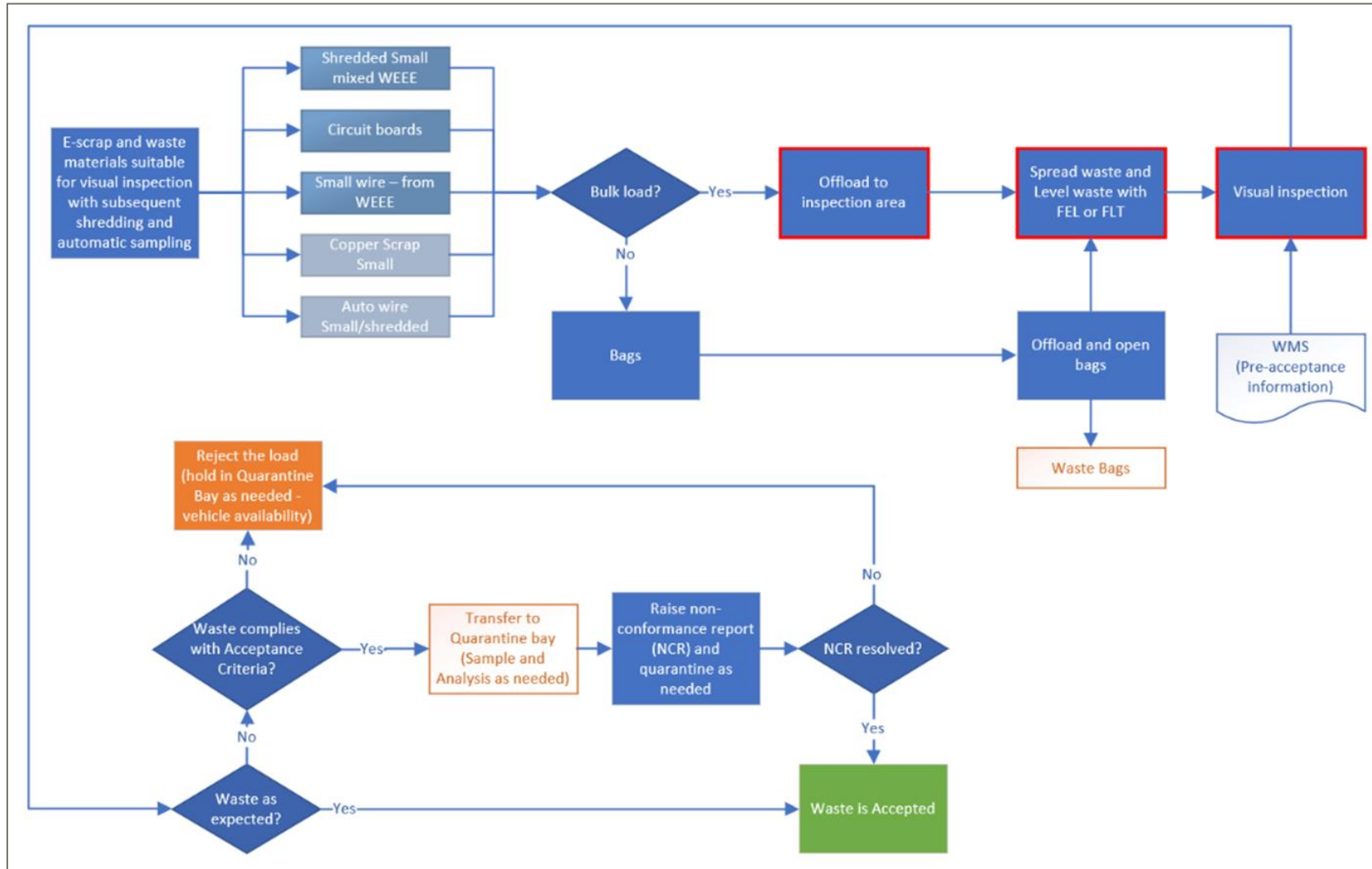


Figure 2.4 Unloading, inspection and transfer of Simple Wastes

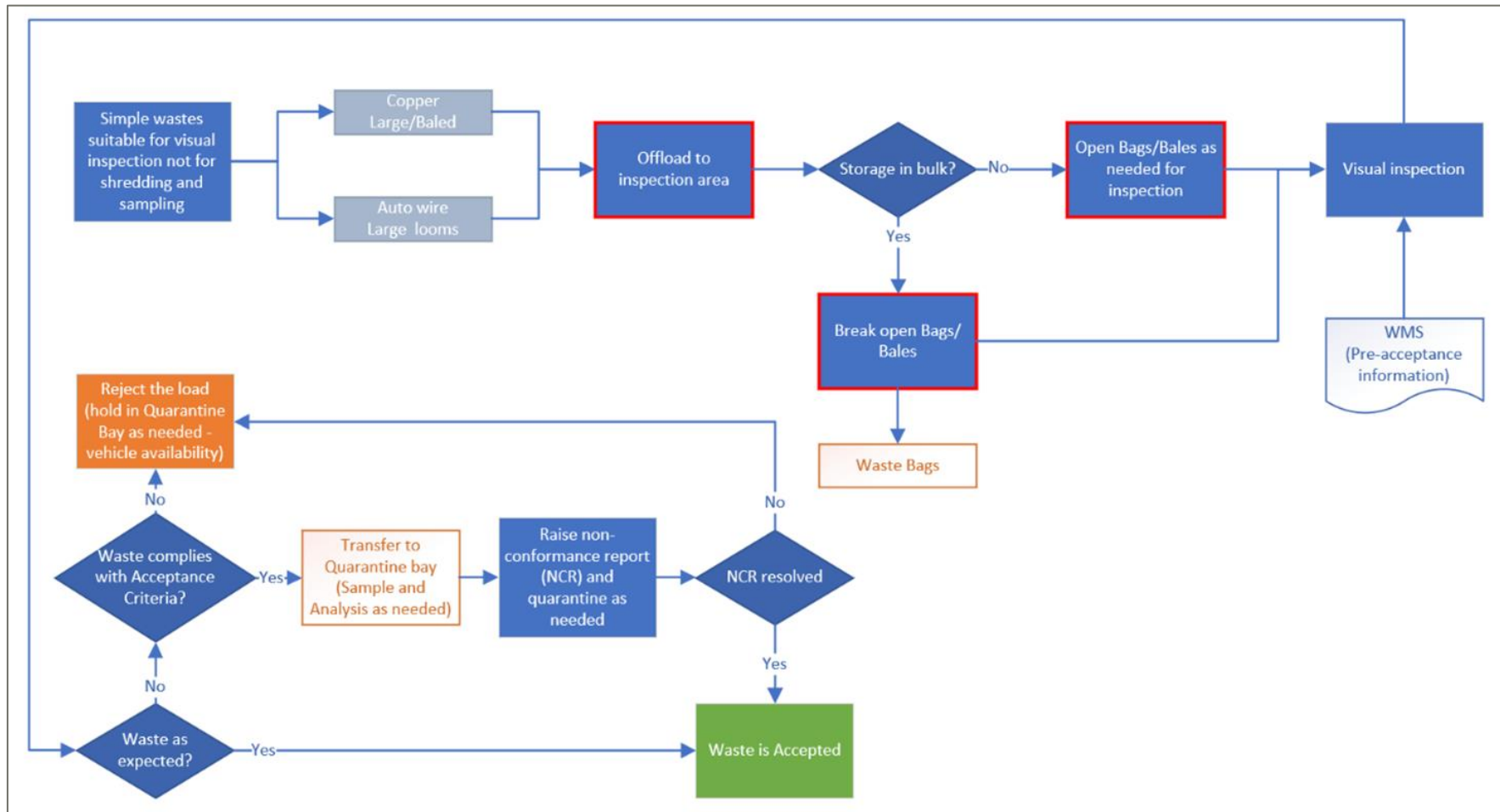
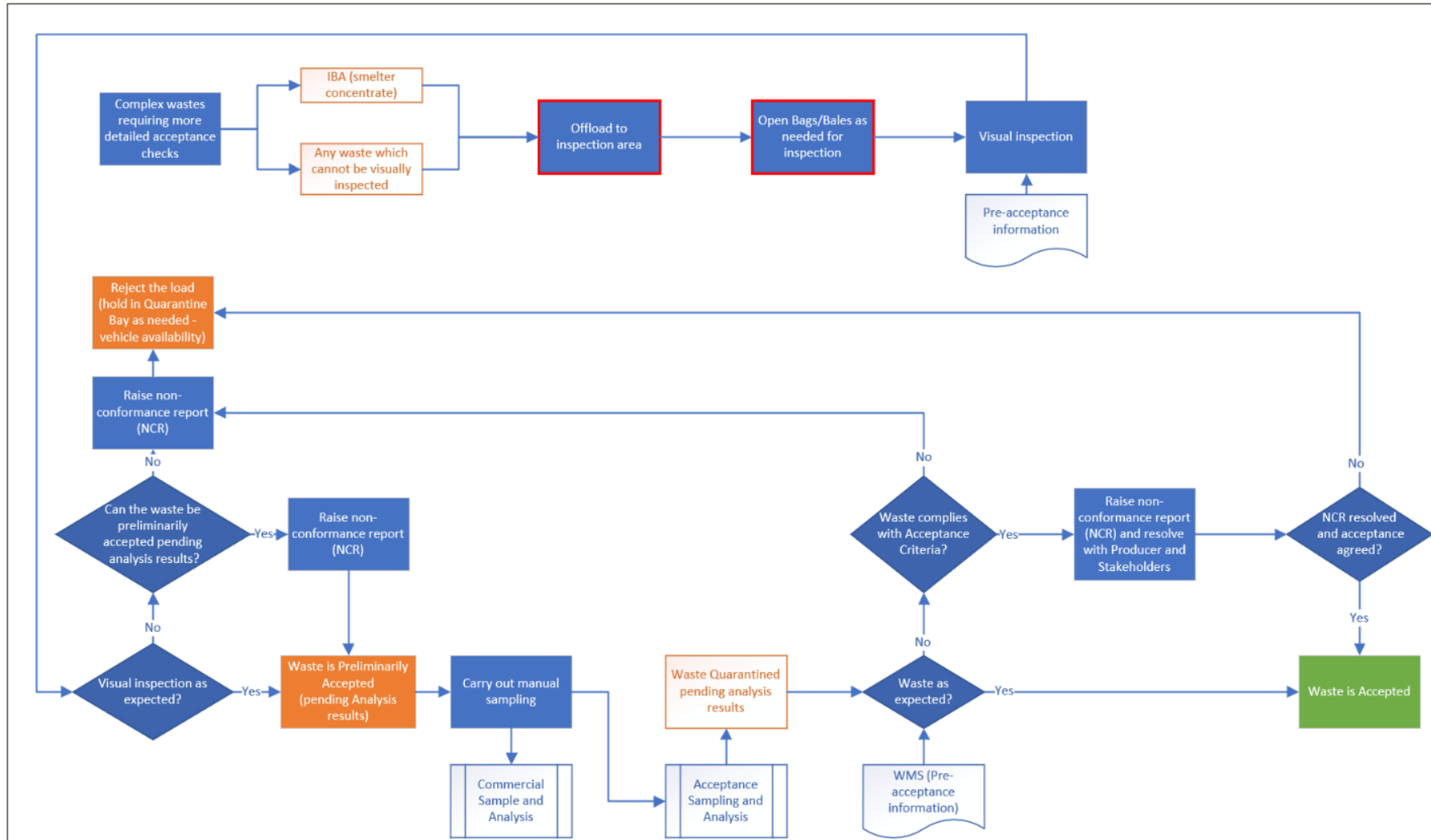


Figure 2.5 Unloading, inspection and transfer of Complex Wastes



2.1 Unloading, secondary inspection and transfer of wastes to storage

Following submission of the Updated Application Technical Report, BRM has confirmed additional measures to minimise fugitive emissions associated with unloading bulk consignments of wastes and to optimise secondary inspection of wastes received:

- Waste suppliers will be contractually obligated to supply loose E-Scrap in a walking floor type trailer (chosen over a bulk tipper type vehicle to provide more control of waste unloading and associated dust generation). The walking floor comprises a hydraulically controlled floor system that transfers the load towards the container doors, discharging the load at a controlled rate to reduce velocity of the waste as it unloads and the associated attrition to minimise dust emissions.
- Complex Wastes will be received in sealed bags and, the Simple Wastes to be received e.g. baled copper and scrap metal, are not inherently dusty or are considered to give rise to dust emissions during handling or storage. On this basis, these wastes will be received in conventional vehicle trailers.
- A gantry will be installed within this area to enable improved visibility of the wastes during unloading and spreading/transfer to the in-floor conveyor for onward transfer to the designated box feeder storage.

Following confirmation that the wastes are suitable for acceptance and complies with contractual requirements, the delivery vehicle will proceed to the entrance to the waste reception area, reversing into the building, guided by a banksman. The roller shutter doors will close behind the vehicle and will remain closed for the duration of the unloading process until the vehicle and the driver are ready to depart.

Waste will be unloaded from the vehicle to enable inspection. Consistent with the arrangements outlined in the Updated Application Technical Report, the following arrangements will be implemented:

- **Unloading and secondary inspection of E-Scrap**
 - ▶ The misting system will be activated before E-Scrap unloading commences.
 - ▶ The vehicle will start unloading waste driving forward very slowly to deposit waste on the floor to create a shallow row of waste.
 - ▶ Operatives will stand on the gantry directly above the tipping area to supervise unloading activities.
 - ▶ In the event waste is received in bags, the bags will be split to enable the waste to be inspected and the packaging discarded.
 - ▶ Visual inspection, and sampling of the wastes (where required) will be undertaken following unloading.
 - ▶ Non-conforming objects will be removed and transferred to the quarantine bays.
 - ▶ E-Scrap will be transferred to the in-floor conveyor by a forklift truck with a loading shovel attachment. The in-floor conveyor, which will then transfer E-Scrap to the designated box feeder or quarantine bay (if required)
- **Unloading and secondary inspection - Simple Wastes and Complex Wastes**

- ▶ Simple and Complex Wastes will be inspected and transferred from the waste reception area to the designated storage bays.

Following unloading and confirmation the driver is ready to exit the building, the doors will be opened. All vehicles exiting the building will drive over the wheel cleaning system to prevent tracking of dust outside the building.

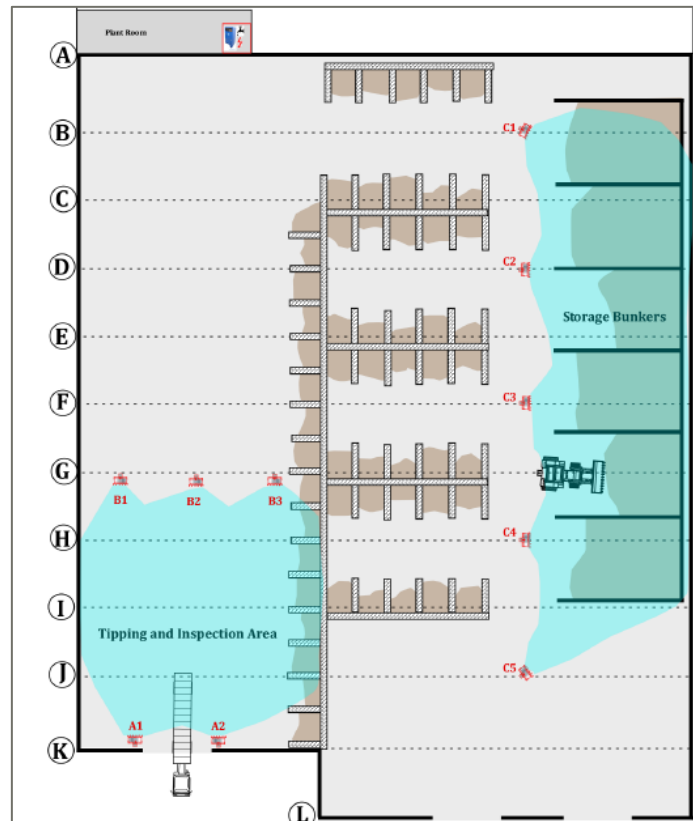
Following departure of the vehicle, the roller shutter door will be closed, and the Waste Reception Area and equipment cleaned to remove dust.

2.2 Pollution prevention measures and emissions controls - unloading, secondary inspection and transfer of waste to storage

The measures outlined below are consistent with those outlined in the Updated Application Report, though further detail is provided to demonstrate these have been optimised as the design has progressed:

- The roller shutter door will remain closed for the duration of unloading operations.
- The tipping area will be bounded by a push wall and in-floor conveyor to contain wastes deposited.
- Using a walking floor system and moving the vehicle forward during unloading to create a shallow row, in preference to using trailers with hydraulic lifting gear to raise containers and deposit waste by gravity to create a stockpile will:
 - ▶ Reduce drop heights and attrition of the waste during unloading, significantly reducing dust emissions.
 - ▶ Enable wastes to be discharged at a controlled rate to further minimise dust emissions.
 - ▶ Enable more effective inspection of the waste.
 - ▶ Minimise double handling of the waste and significantly reduce dust emissions compared to conventional dumping, as shallow rows remove the requirement for significant reworking of stockpiles to identify non-conforming materials and load waste onto the in-floor conveyors.
- Use of an in-floor conveyor to feed material into the process will reduce dust emissions and contain releases within this area compared to transferring waste in shovelled vehicles (which will be required when the in-floor conveyor system is unavailable (for instance due to mechanical breakdown)).
- Fixed misting units will be installed at strategic locations to suppress dust emissions in areas where dust is anticipated to be generated and it is not practicable or feasible to extract air for abatement. The units will be supported from the building ceiling trusses within the Waste Reception Area and the E-Scrap Storage Bunkers. The coverage of the fixed misting system in these areas is illustrated at Figure 2.6. It is not anticipated dust suppression will be required in the storage bays containing bagged wastes located out with the area of coverage, though mobile misting systems will be available.

Figure 2.6 Spatial coverage of the dust suppression system within the main building



Locating the units at height will increase the area covered and more effectively suppress fine airborne dust. The misting system will have capability to operate with atomiser mode to release very fine mist proportionate to the dust levels presented. The mist will be absorbed by the E-Scrap, temporarily increasing the moisture content of the waste. In the event increased levels of dust suppression is required, accumulated moisture may generate dampened materials. Based on operational experience at other Glencore sites:

- ▶ Dampened material will remain suitable for treatment and the installation and for down-stream processing.
- ▶ Given the low level of water charge and temporary and intermittent use of the misting system, run-off will not be generated in volumes that require collection in blind sumps or similar.
- The area will be cleaned down following departure of vehicles from the waste reception area and high standards of housekeeping will be maintained.
- Pedestrian access and egress will be via the adjacent welfare block. All personnel will be required to change into clean apparel before leaving the building.
- A wheel cleaning system will be installed to remove dust from vehicle tyres.
- The Dust Management Plan submitted as Appendix I of the Updated Application Technical Report will also be updated to reflect changes outlined above in advance of commissioning activities.

3. Transfer, loading and export of E-Scrap, Simple and Complex Wastes

Arrangements for loading waste into vehicles for export have not yet been confirmed though a decision is anticipated imminently. The selected system will be installed within the Container Loading Area. According to the characteristics of the wastes, these will be transferred to ISO containers in free form and, depending on the findings of the design review, wastes will either be bagged or bulk loaded. For completeness, arrangements for both systems are outlined below.

Optioneering has been undertaken to confirm the preferred technologies for bagging and bulk loading. The systems have been selected based on criteria compliant with BAT and Appropriate Measures, with the following matters afforded high priorities:

- Characteristics of the waste
- Legislation that governs containment of wastes for trans-frontier shipments
- Effectiveness of tie-ins to the air extraction and abatement systems
- Opportunities to minimise fugitive emissions
- Site specific considerations, including spatial constraints.

Commercial Sampling of E-Scrap

Representative samples of the E Scrap will be retrieved for commercial purposes downstream of the secondary shredder and comprise:

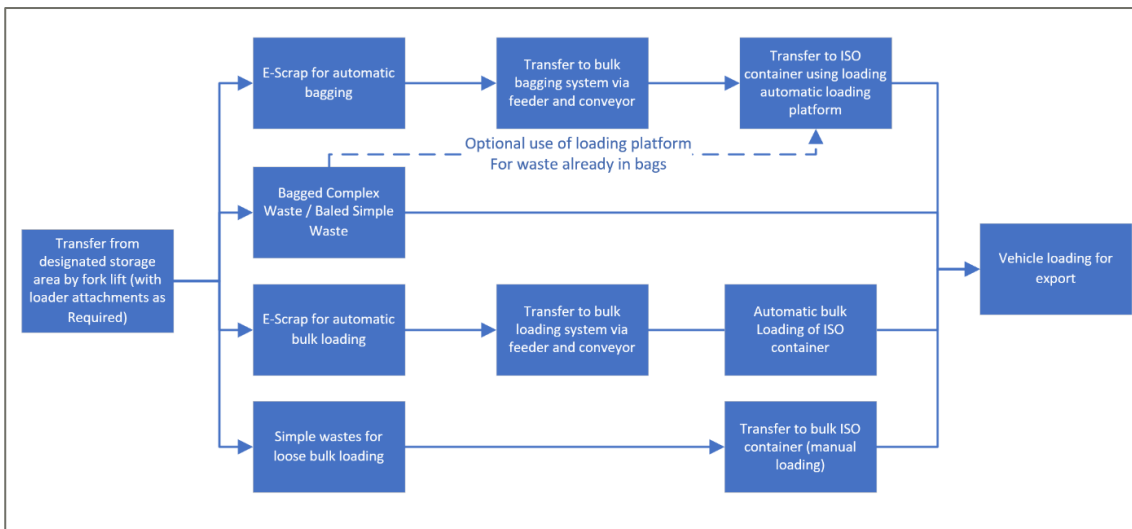
- Duplicate final and reserve 10kg samples to be analysed for commercial purposes. Samples will be contained in sealed plastic containers for transfer to the off-site laboratory.
- A larger reserve sample that will be contained within sealed 1m³ flexible intermediate bulk containers (FIBCs), filled via an automated bagging system. The FIBCs will be transferred to either bays or racking located within the area allocated for accepted waste storage. Reserve samples will be retained on site for a period of upto 8 weeks in case of a commercial dispute arising with the waste supplier. Unused samples will be either bagged or bulk-loaded for export with E-Scrap.

Shredded E-Scrap that is not collected for samples will be transferred the dedicated storage bunkers for export.

Figure 3.1 summarises the approaches to be taken to bagging and bulk loading of wastes, from removal from the designated storage areas through to export. These arrangements are considered in further detail below and summarised as follows:

- Option 1 – material exported in bags (automated bagging system and vehicle loading system)
- Option 2 – material exported in bulk (tilting type bulk loading system and screening of material).

Figure 3.1 Loading and export E-Scrap, Simple and Complex Wastes



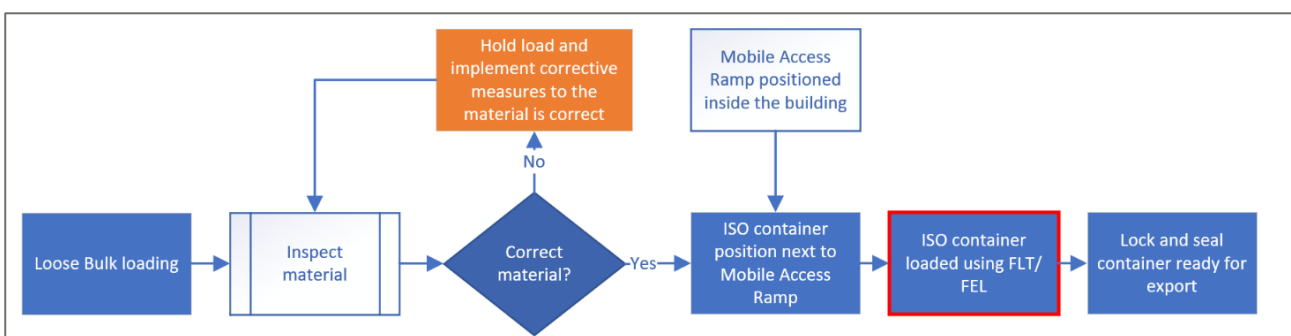
3.1 Transfer and loading of all wastes

Before transferring wastes for export, the Container Loading Area will be cleaned using dry techniques.

Simple wastes that do not require bagging

Irrespective of the decision to install bagging or bulk loading plant, unbagged Simple Wastes will be transferred from the storage bays into ISO containers by forklift trucks or loading shovels depending on the characteristics of the waste. Given the physical and chemical characteristics of these wastes, these may be loaded without packaging, as outlined below.

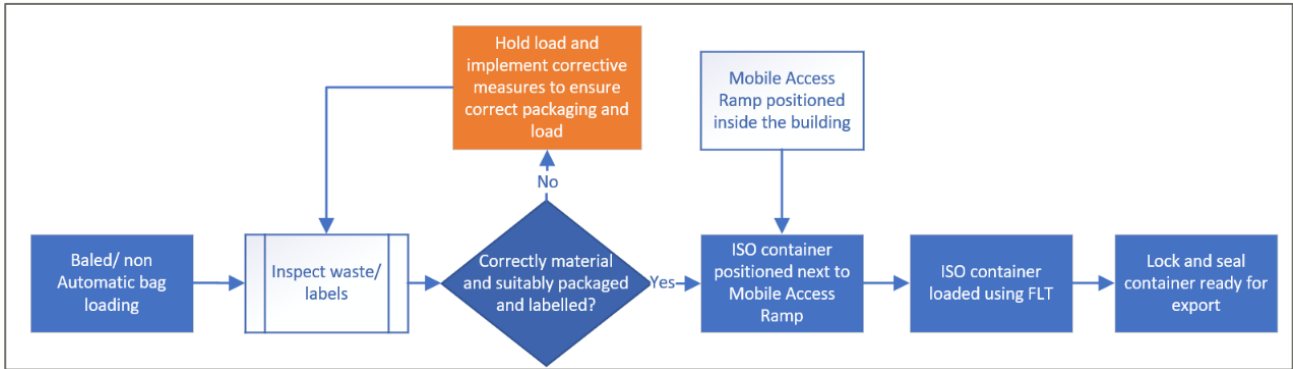
Figure 3.2 Loading and export of wastes that do not require packaging



Pre-bagged and baled wastes

Bagged wastes (including Complex Wastes) will either be loaded using the Automatic Bagging Systems loading platform or, in the event the bagging plant is not installed, these will be loaded manually as presented below.

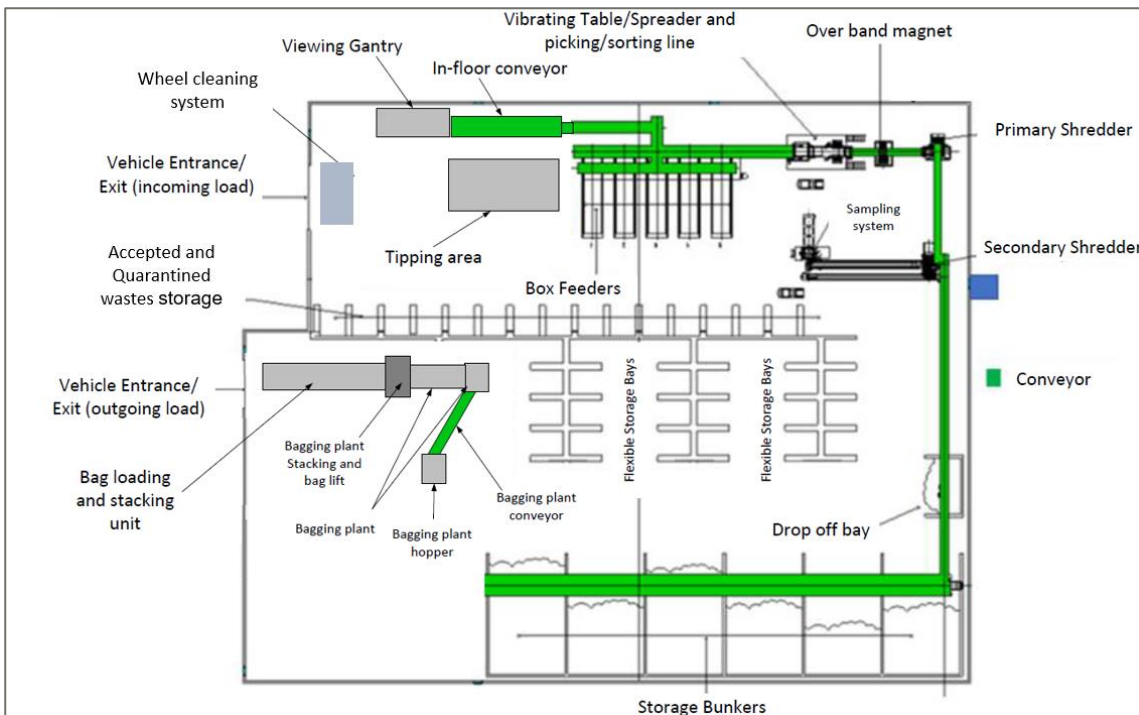
Figure 3.3 Loading and export of pre-bagged and baled wastes



Bagging wastes

The indicative layout of the Bagging Plant is presented at Figure 3.4 below.

Figure 3.4 Indicative layout of Option 1 - Final Bagging Plant



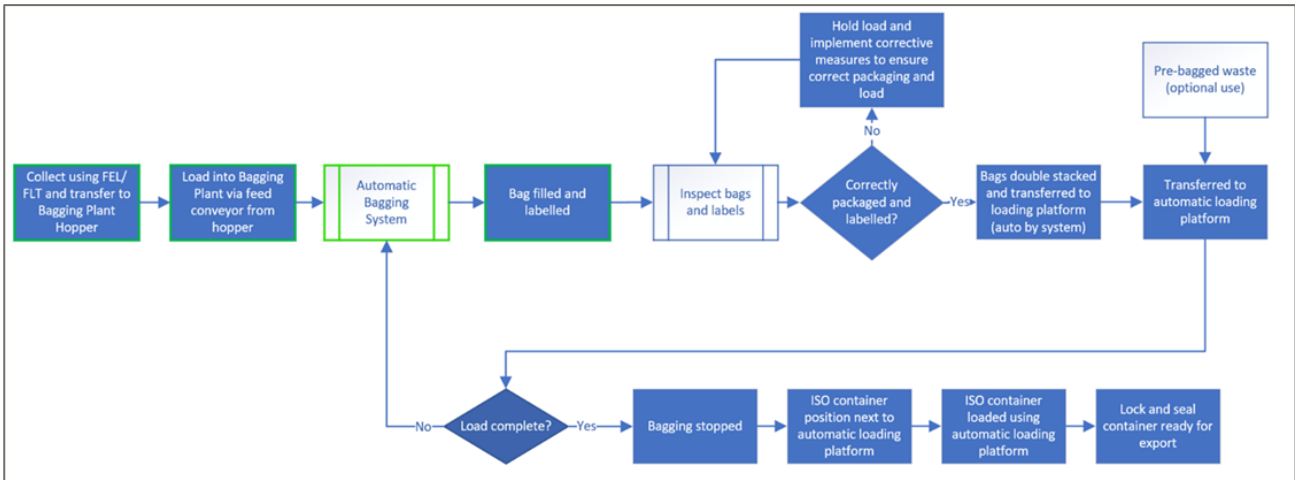
In the event a final bagging system is installed:

- Simple Wastes may be bagged for export
- E-Scrap will be bagged for export.

A front end loader (or forklift truck equipped with a bucket) will move wastes from the storage bays/bunkers onto a covered conveyor that will discharge material into the hopper. The waste be gravity fed via a discharge hose into a conventional fully automated bagging system that will fill and seal the bags. The hopper will be automated to ensure a consistent and controlled feed to prevent overfilling.

Once filled the bulk bags will be sealed within the bagging system and transferred onto a lifting and conveyor system to be stacked ready for loading into the ISO container for export. Arrangements for bagging wastes are outlined below.

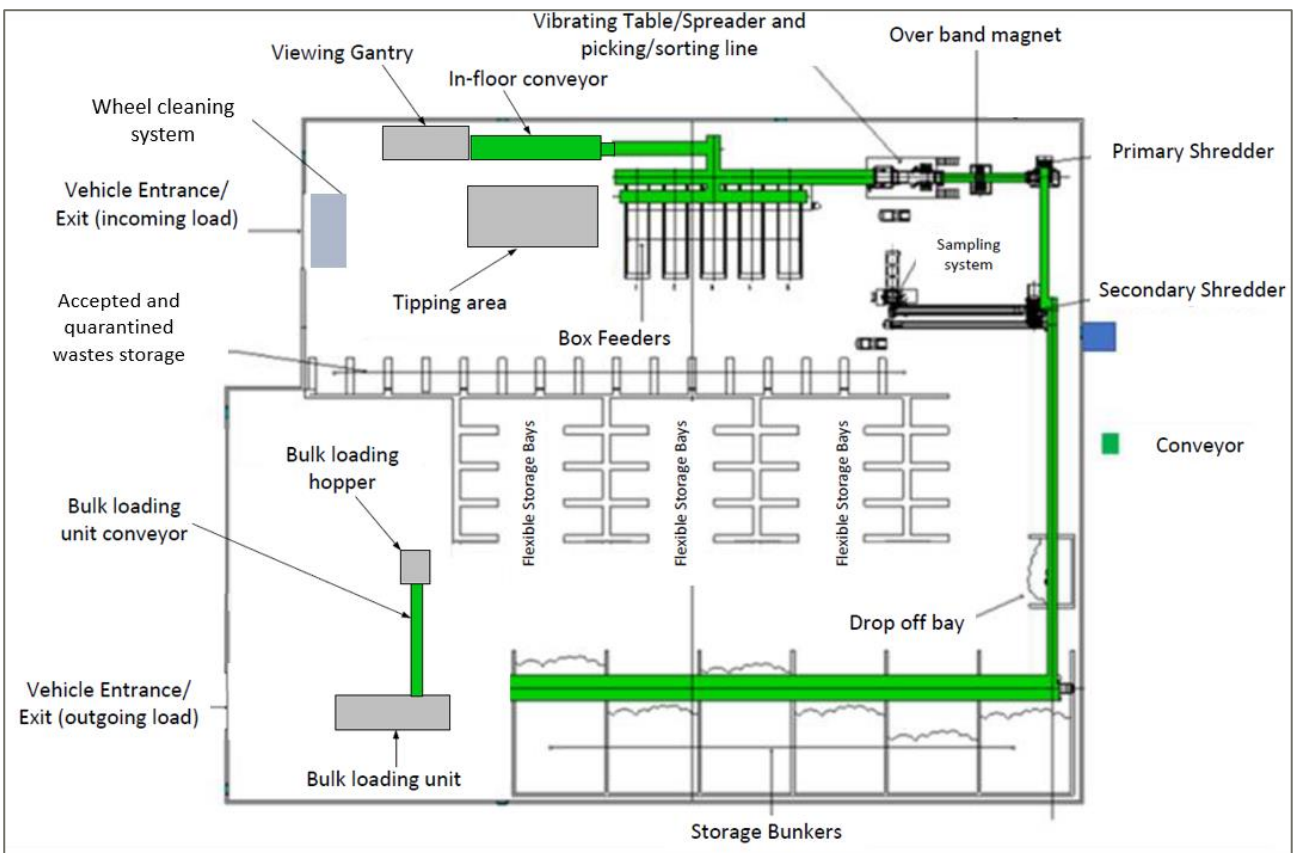
Figure 3.5 Bagging plant system



Transfer and bulk loading of wastes

The indicative layout of the Bulk Loading Area is presented below.

Figure 3.6 Indicative layout of Option 2 - Bulk Loading



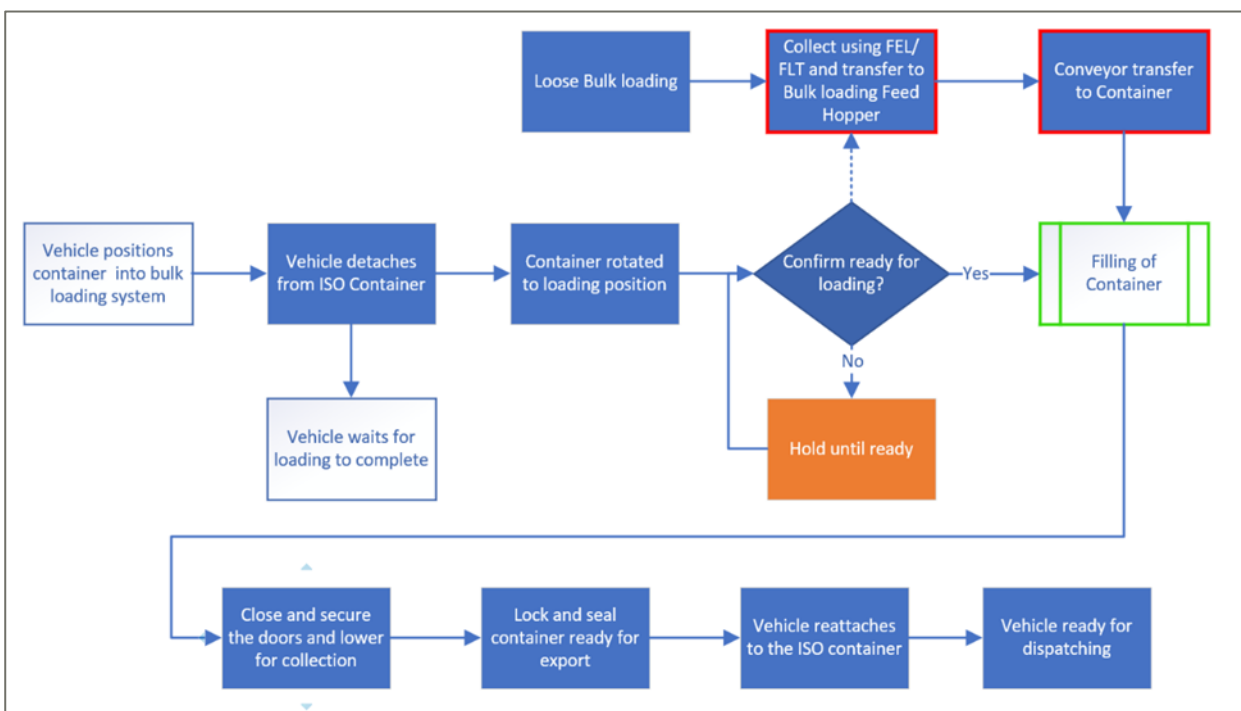
In the event a bulk loading system is installed, shredded E-Scrap for bulk loading will be transferred:

- From the storage bunkers onto the bulk loading conveyor hopper using a front-end loader (or forklift truck equipped with a bucket).
- From the conveyor into the bulk loading hopper
- From the bulk loading hopper into the tilted ISO Container for export.

A tilting ISO container loading system will be operated to enable containers to be loaded effectively and to provide effective abatement of dust generated. This is a conventional bulk loading technology for loading waste metals.

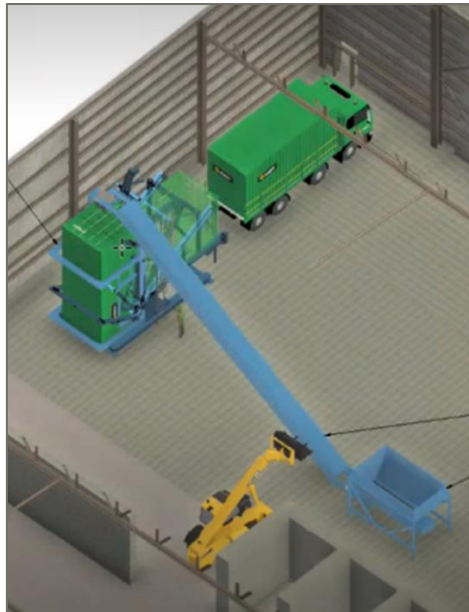
A summary of the arrangements for operating the bulk loading system is presented below.

Figure 3.7 Bulk loading system



The vehicle collecting the E Scrap (with an empty ISO container) will reverse up to the loading system to engage the container. Reversing operations will be supervised and be supported by a Banksman. The ISO container will be uncoupled from the trailer and engaged on the tilting loader and the container doors manually opened. The loading system will rotate the container vertically until it achieves the optimal loading position. E-Scrap will then be loaded into the container at a controlled rate. Once loading is completed the hydraulic arms will close the container doors before it is tilted back into the horizontal position where the doors will be manually locked, the hydraulic arms released, and the container recoupled with the vehicle for removal from site.

Figure 3.8 Schematic of bulk loading area and operating stages of the tilting loader



3.2 Exporting wastes

Collection vehicles will reverse into the building, guided by a banksman. The roller shutter door will be closed behind the vehicle and will remain closed whilst loading activities are undertaken and until departure. The roller-shutter door will be shut immediately behind the departing vehicle. The container loading area will then be cleaned to remove any residual dust.

3.3 Pollution prevention measures and emissions controls – loading and export of wastes

The measures to be implemented for loading and export of waste are broadly consistent with those outlined at Section 2.3 for unloading, inspecting and handling wastes. Complex Wastes will remain packaged in sealed bags and Simple Wastes are anticipated to be unpackaged (e.g. copper scrap).

It should be noted E-Scrap for export will be significantly less dusty than when imported due to removal of a significant component of the fines during treatment. Complex Wastes will be stored in bags. Simple Wastes are not dusty or friable by nature (e.g. copper). For both export options, the techniques incorporated into the design and to be accommodated in operating techniques will include:

- Conveyors within the Container Loading Area will be covered or hooded for extraction of air to the abatement system. These will also be installed with heat detection and emergency shut down arrangements as necessary.
- Use of chevron belts for steep elevated conveyors to retain waste on the belts to prevent overspilling and dust emissions.
- Fast acting roller shutter doors installed in the Container Loading Area will remain closed whilst bagging, bulk loading and vehicle loading operations are undertaken.
- Extraction for abatement of dust generated during bulk loading if required.

- Waste will be discharged into bags and containers using automated systems to ensure materials will be released at a controlled rate to minimise attrition and prevent overfilling.
- The Container Loading Area will be cleaned down when individual loading activities are completed
- The Dust Management Plan submitted as Appendix I of the Updated Application Technical Report will also be updated to reflect changes outlined above in advance of commissioning activities.

In addition, the building architecture includes louvres to support air changes. The louvres will be installed within the roof area to minimise the potential for dust to be released to ambient air.

4. Appropriate measures

Appropriate measures relevant to activities described at Section 2 and Section 3 above are outlined at Table 4.1 and Table 4.2 below.

Table 4.1 Appropriate measures for secondary inspection, unloading, acceptance and transfer of wastes for storage, bagging and loading of wastes

Reference	Requirement and applicability	Comment
BAT Conclusions for Wastes Treatment		
BAT Conclusion 26	<p>In order to improve the overall environmental performance, and to prevent emissions due to accidents and incidents, BAT is to use BAT 14g and all of the techniques given below:</p> <ul style="list-style-type: none"> - implementation of a detailed inspection procedure for baled waste before shredding. - removal of dangerous items from the waste input stream and their safe disposal (e.g. gas cylinders, non-depolluted EoLVs, non-depolluted WEEE, items contaminated with PCBs or mercury, radioactive treatment of containers only when accompanied by a declaration of cleanliness 	<p>Baled wastes will not be shredded Waste will be inspected, and foreign materials will be removed to enable compliance with this requirement as described in Section 2.</p>
Appropriate Measures – WEEE* and Inert and Non-hazardous Wastes**		
3.2.5*	The waste offloading, reception and quarantine areas must have impermeable surfaces with a sealed drainage system. This system must collect all surface water run-off and channel it to a blind sump unless you can lawfully discharge it.	<p>The main building is self-bunded and water used for dust suppression will be retained within the waste stored at the site.</p> <p>There will be no releases to surface water arising from the waste storage, handling and treatment and the surfacing of areas in which these activities are undertaken comprises an impermeable concrete floor slab within a building.</p>
3.2.6*	You must clearly designate a materials reception area (or areas). Staff controlling the inspection, reception, and validation of materials at the facility, must be trained in their respective roles.	A Waste Reception Area is designated and operators within this area will be suitably trained.
3.2.11**	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.	These areas comprise an impermeable concrete floor slab within a building.
3.2.12*	If there is a known risk of radioactive contamination other than the presence of smoke detectors and certain specialist lamps such as xenon lamps, you must check	Radioactive testing of wastes will be undertaken at the weighbridge for all

	the waste to determine that it does not include radioactive material unless your site is permitted to accept that type of radioactive waste.	consignments received at the installation. Secondary inspection will provide an additional safeguard.
4.1.14*	Indoor waste storage areas must have an impermeable surface and you must provide spillage collection facilities.	This requirement is complied with.
3.2.13*	You must establish quarantine areas for WEEE and materials that are prohibited, awaiting full inspection, or awaiting assessment or removal.	Designated quarantine bays will be available for this purpose.
3.3.1**	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.	The quarantine bays outlined above will be installed on an impermeable concrete floor slab within a building.
3.2.14*	Quarantine storage must be for a maximum of fourteen working days.	As the waste is not organic or putrescible and will not degrade, timescales for storing quarantined wastes will be determined according to the time required for return of analytical data.
3.2.16* 3.3.3**	Quarantine storage must be separate from all other storage and clearly marked as a quarantine area.	Quarantine areas will be designated and will be identified to ensure only quarantined wastes are stored therein.
3.3.2**	Where there is a risk of fugitive emissions from quarantined waste you must store it in closed or covered containers or within a building.	All wastes will be stored within the main building. Wastes received in closed or covered containers will be rejected.
3.3.4**	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.	Not applicable, see above.
Appropriate Measures – Chemical Waste, relevant to Complex Waste only		
1	You must store waste in locations that minimise the handling of waste. Waste handling must be carried out by competent staff using appropriate equipment.	The process is designed to prevent handling of wastes and travel distances. Equipment is selected based on the nature and characteristics of the waste types. The Loading Area is located as close as possible to the storage areas to minimise handling
2	Where possible, you should locate storage areas away from watercourses and sensitive perimeters (for example, those close to public rights of way, housing or schools). You must store all waste within the secure area of your facility to prevent unauthorised access and vandalism.	All waste will be stored within a secured building within a secure compound area with 24 hours / 7 day security. The site also benefits from an extensive existing flood defence structure and kerbing will be installed along the site road.
4	You must clearly document the maximum storage capacity of your site and the designated storage areas.	This requirement is noted.

	You must not exceed these maximum capacities. You should define capacity in terms of, for example, maximum tank or vessel capacities, tonnage and numbers of skips, pallets or containers. You must regularly monitor the quantity of stored waste on site and designated areas and check against the allowed maximum capacities.	The Stock Management System will also incorporate measures to address these requirements and IT systems will track and maintain stock levels to ensure maximum quantities are not exceeded
5	You must clearly mark hazardous waste storage areas and provide signs showing the maximum quantity and hazardous properties of wastes that can be stored there.	Signage will be installed to confirm bays in which hazardous wastes are stored. This signage will include the information outlined opposite.
6	Storage area drainage infrastructure must: <ul style="list-style-type: none"> - contain all possible contaminated run-off - prevent incompatible wastes coming into contact with each other - prevent incompatible wastes coming into contact with each other 	Due to the limited nature of the wastes received in terms of physical and chemical characteristics, there is no potential for incompatible wastes coming into contact with each other All wastes will be stored within the main building and robust arrangements will be installed to retain waste and dust within the building and prevent tracking of waste to external areas. The building internals are not connected to the site drainage system.
7	Secondary and tertiary containment systems must conform to CIRIA guidance C736 Containment systems for the prevention of pollution.	CIRIA 736 has been taken into account in the design of containment systems.
8	You must store containerised wastes that are sensitive to air, light, heat, moisture or extreme ambient temperatures under cover protected from such ambient conditions. Covered areas must have good ventilation. This applies to any such container:	Not applicable. Wastes received are not sensitive to the elements and all wastes will be stored within the main building. The facility is designed to be a dry site with non-wetting misting systems used where needed, as this is a critical parameter for downstream recovery
9	You must store wastes in sealed metal containers under cover if they have the potential for self-heating or self-reactivity. You must monitor the containers for heat build-up. Such wastes include rags and filter materials contaminated with metal swarf, low boiling point oils or low flash point solvents.	Not applicable. The waste streams are not self-heating or self-reactive.
10	Wherever practicable you should store all other wastes under cover. Covered areas must have good ventilation. This applies to any such container: <ul style="list-style-type: none"> -held in general storage, reception storage (pending acceptance) or quarantine -being emptied, repackaged or otherwise managed <p>Under cover storage provides better protection for containers than open air storage and minimises the</p>	All wastes will be stored within the main building. Wastes will not be accepted in containers other than bags.

	<p>generation of contaminated water. Covered storage also:</p> <ul style="list-style-type: none"> -lowers temperature fluctuations that can cause pressure build up in containers - reduces the degradation of containers through weathering 	
11	You must not store hazardous waste in open-topped containers. Empty open-topped containers should be kept in a building or undercover to prevent rainwater ingress.	Complex Wastes will be stored in sealed bags.
12	You must not store or hold wastes on site in vehicles or vehicle trailers unless you are receiving them or preparing them for imminent transfer (meaning that you will remove them from site within 24 hours, or 72 hours if over a weekend).	Waste will not be stored in vehicles or trailers. BRM will operate a strict logistics system with booked delivery and dispatch slots. Vehicles/trailer will not remain on site unless unloading or loading wastes.
13	You should pay particular attention to avoid the build-up of static electricity when you are storing or handling flammable wastes and materials. You should use leak detection systems and alarms (for example VOC alarms) and automatic fire suppression equipment based on a recorded risk assessment.	Wastes to be accepted are not flammable nor prone to the build-up of static electricity. A risk assessment of the fire risks has been undertaken and is presented in the Site-wide Fire Strategy and Fire Prevention Plan.
14	You must provide adequate bunding of all storage areas, and containment and treatment of any water run-off.	The main building is self-bunded to mitigate against flood risk and is not connected to site drainage systems. All waste handling, storage and treatment activities will be undertaken within the building.
15	You must not accumulate waste. You must treat wastes, or remove them from the site, as soon as possible. Generally you should do this within one month of receipt, but all wastes must be removed within 6 months of receipt. This applies even when the waste might be used as a reactant. Where a shorter time period is given in a permit condition you must comply with the permit for that waste. Where a waste is stored for longer than allowed you must inform the Environment Agency.	All wastes will be removed within 6 months of acceptance. Typically waste will be dispatched within 2 months following commercial assay BRM will operate a stock management to manage the waste inventory.
16	All stored containers must keep the labelling they had at acceptance. If the label is damaged or no longer legible you should replace the label with that same information.	All bagged wastes will be labelled as part of the stock managements system. Any missing or damaged labels will be replaced
17	You must handle and store containers so that the label is easily visible and continues to be legible.	Containers will be limited to 10 kg sealed sample containers, bulk bags and bales. The wastes will be stored in individual designated areas. Arrangements will be implemented to inspect and replace labels.

18	You should keep solid waste dry and avoid the dilution of hazardous waste.	The facility is designed to be a dry site with non-wetting misting systems used where needed. All materials will be protected from moisture as it is a critical parameter for downstream recovery
19	You must keep clean rainwater and clean cooling water separate from wastes and waste waters.	Cooling water and other process effluents will not be generated at the site.
20	You must keep incompatible wastes segregated so that they cannot come into contact with one another. You must store flammable wastes apart from other wastes to prevent fire spreading between them and other materials. You must use sealed drainage systems to prevent leaks and spillages contaminating other wastes.	Wastes stored at the site are not incompatible nor flammable. The facility will be managed and operated in accordance with the Fire Prevention Plan. In the unlikely event of fire, extinguishant will be retained in the self-bunded building.
21	There must be pedestrian and vehicular access (for example, forklift) at all times to the whole storage area so that you can retrieve containers without removing others that may be blocking access – other than removing those in the same row.	The layout of the facility and sizing of the storage bays has been designed to prevent double handling of wastes.
22	You must store all waste containers in a way that allows easy inspection. You must maintain safe access, with a gap of at least 0.7m between rows of bulk containers or palletised wastes.	This requirement is noted.
23	You must move drums and other mobile containers between different locations (or loaded for removal off site) following written procedures. You must then amend your waste tracking system to record these changes.	Not applicable, Wastes in drums and mobile containers will not be accepted. Stock movements between bays will be managed in accordance with the stock management system
24	You must stack bags and boxes of waste no more than 1m high on a pallet. You must not stack pallets more than 2 high.	This point is noted.
25	You must stack containers specifically designed for stacking, and no more than 2.2m high on a pallet.	This point is noted.
26	You must store all other containers on pallets. You must not stack these pallets more than 2 high, except for empty containers which can be stacked 3 high.	This point is noted.
27	Stacked bags, boxes and containers must be stable. They must be secured with, for example, banding or shrink-wrap, if required. The packages must not extend beyond (over-hang) the sides of the pallet. Any shrink-wrap used must be clear or transparent so that you can identify waste types, damaged containers, leaks or spillages and incorrectly stacked containers. You must be careful not to damage any packages during stacking.	Complex Wastes will be stored in bags only, in accordance with these requirements. All bagged/baled waste will be stacked in a manner to ensure stability.
28	All waste containers must remain fit for purpose. You must check any containers (and pallets they may be stored on) daily and record non-conformances. Non-compliant containers and pallets must be made safe. You must immediately and appropriately manage any unsound, poorly labelled or unlabelled containers (for example, by relabelling, over drumming and transferring the container's contents). You must risk assess,	This requirement is noted. All bagged wastes will be inspected as part of routine inspections and any defect the condition of the packaging will be rectified.

	<p>approve and record the use of containers, tanks and vessels:</p> <ul style="list-style-type: none"> -beyond their specified design life -where you use them for a purpose, or substances, other than the ones they were designed for 	
29	You must not handle waste or its packaging in a way that might damage its integrity, unless it is appropriate to destroy a waste or its packaging, for example by shredding. You must not, for example, walk on or throw waste or waste packages.	All bags will be handled using appropriately designed lifting equipment.
30	You should, where applicable and based on a recorded risk assessment, make inert the atmosphere of tanks containing organic liquid waste with a flashpoint less than 21°C. This can be done, for example, by using nitrogen gas.	Not applicable. The facility will not accept waste streams with these characteristics.
31	You must store asbestos waste double bagged or wrapped, in sealed, closed and locked containers. You must not store asbestos waste loose. You must not put asbestos wastes into bays or transfer it between different skips or containers. You must not use mechanical equipment, for example loading shovels, chutes and conveyors to move asbestos waste.	Not applicable. The facility will not accept asbestos containing wastes.
32	You must not stack wheeled containers on top of one another. Do not stack empty wheeled containers into one another more than 2.2m high.	Not applicable. Waste in wheeled containers will not be accepted.
33	All containers that need them should have a lid or bung, and the lid or bung must be closed except when the container is being sampled, having waste added into it or having waste removed from it.	Samples of shredded E-Scrap will be retained in sealed containers for transfer to the laboratory.
34	You must not stack skips containing waste. Skips containing hazardous waste must be enclosed when not being loaded or unloaded. You should store loose bulk hazardous wastes under cover.	The facility will not accept or store hazardous wastes in skips. All wastes including Hazardous Wastes will be stored within the main building.
35	You can use racking systems to store waste but you must consider segregation, ability to inspect, separation and fire suppression measures. Racking systems must be designed and constructed in accordance with HSG76 Warehousing and storage.	This point is noted. In the event racking is installed for storage of samples and bagged wastes, the design of racking will comply with the Guidance Note referenced and operational measures will be implemented to address this appropriate measures.
36	<p>You must:-contain wash waters within an impermeable area and either discharge them to foul sewer or dispose of them appropriately off site.</p> <ul style="list-style-type: none"> - prevent run-off into external areas or to surface water drains 	The main building is self-bunded and includes an impermeable concrete floor slab that are not connected to the site drainage system. The site will be operated as a dry facility. It is therefore anticipated dry cleaning techniques will be deployed and water use will be limited to the dust suppression systems for limited durations when required; the waste being absorbed by the waste rather than generating run-off.

37	You must manage waste in a way that prevents pests or vermin. You must have specific measures and procedures in place to deal with wastes that are identified as causing pests or vermin.	The wastes accepted at the facility will not attract vermin or pests
38	You must inspect storage areas, containers and infrastructure daily. You must deal with any issues immediately. You must keep written records of the inspections. You must rectify and log any spillages of waste.	Daily checks will be undertaken, and any issues identified will be dealt with accordingly. Details will be recorded as part of the sites management system
39	You must train forklift drivers in the handling of palletised goods, to minimise forklift truck damage to the integrity of containers and infrastructure.	All operator of plant and equipment will be suitably trained and qualified.
40	You must not carry out activities that represent a clear fire risk within any storage area. Examples include: - grinding - welding or brazing of metalwork - smoking - parking normal road vehicles, except while unloading or loading - charging batteries	These activities will be subject to a strict permit to work system. All work will be risk assessed and the appropriate permits and controls issued. These will include hot work permits. The facility has a strict no smoking policy in operational areas. The facility has been designed so that incoming and outgoing vehicles are isolated from storage areas
41-52	Bulk storage in tanks	Not applicable. The facility will not store wastes in bulk storage tanks.
53-70	Transfers to/from tankers	Not applicable. The facility will not accept liquid wastes.
71-77	Aerosol storage	Not applicable. The facility will not accept waste aerosols
78	Sorting is the placing together of containers with other waste containers of the same type, without emptying the contents from the container. You must have a permit that specifically allows you to carry out storage activities (coded D15 or R13).	Not applicable. Sorting as described opposite will not be undertaken. Consignments in bags will be handled in accordance with the Stock Management System.
79	Repackaging is the removal of waste from a container, or into a container. This may involve bulking it with other wastes of the same type from other containers. You must have a permit that specifically allows you to carry out repackaging activities (coded D14 or R12).	This point is noted.
80	Bulking of waste that is not regarded as repackaging includes: - discharging from a tanker to bulk storage of wastes of the same type - tank to tank transfer where both tanks contain wastes of the same type - These activities are storage (coded D15 or R13).	This point is noted.
81	81. You must only bulk or repackage wastes together if they are materially the same. They must not react when they are bulked and they must not change the waste's composition.	Complex Wastes will not be bulked up or repackaged. Only E-Scrap will be stored In bulk.
82	If a waste is mixed with other similar wastes, where the resulting mixture does not have significantly different characteristics from the mixed wastes (for example blending compatible combustible or flammable wastes as a fuel), this activity is mixing or blending (coded D13	This point is noted.

	or R12). Any other mixing that changes a waste is treatment.	
83	You must have a permit that specifically allows you to mix hazardous waste with any: - non-hazardous waste hazardous waste in a different category non-waste	This point is noted. Hazardous and non-hazardous wastes will not be mixed
84	You must not mix, bulk or repackage: wastes which could be recovered with other wastes if this means that the waste must now be sent for disposal or a lower form of recovery liquid wastes or infectious wastes with other wastes for the purpose of landfilling oils where this could affect their regeneration or recycling wastes containing Persistent Organic Pollutants (POPs) with another material solely to generate a mixture below the defined low POPs content waste to deliberately dilute it	This point is noted. Complex Waste will not be mixed.
85	You must transfer wastes from containers into other storage vessels using a dip pipe, not by pouring.	Not applicable. The facility will not accept liquid wastes
86	Repackaging or mixing must only take place in a dedicated area or store which has the plant and equipment needed to deal with the specific risks of that process. For example, this could include abatement or local exhaust ventilation.	The design has been developed to address this requirement.
87	Except for small packages with a volume less than 5 litres, or damaged containers, you must move containers using mechanical means. For example, use a forklift truck with a rotating drum handling fitting, or using pumps for liquids.	Not applicable. The facility does not accept smalls.
88	You must label containers of repackaged or mixed wastes so that you can identify their contents and origin through the tracking system. After repackaging, you must move the bulked materials and emptied containers to an appropriate segregated storage area.	All repackaged bags will be labelled, and all empty bags will be appropriately segregated ready for disposal or recovery
89	You must have a risk assessment and carry out appropriate compatibility testing to make sure that bulked wastes will not react with each other, or with the container into which they are being placed.	Not applicable.

Table 4.2 Appropriate measures – Fugitive emissions to air

Reference	Requirement and applicability	Comment
BAT Conclusions for Wastes Treatment. Appropriate Measures for Chemical Wastes ***		
BAT Conclusion 14	Emissions to Air – Design Considerations In order to prevent or, where that is not practicable, to reduce diffuse emissions to air, in particular of dust, organic compounds and odour, BAT is to use an appropriate combination of the techniques given below.	Diffuse emission sources will be minimized by using covered conveyors, reducing opportunities for double handling of wastes,

Reference	Requirement and applicability	Comment
	<ul style="list-style-type: none"> a. Minimising the number of potential diffuse emission sources b. Selection and use of high integrity equipment c. Corrosion prevention d. Containment, collection and treatment of diffuse emissions e. Dampening f. Maintenance g. Cleaning of waste treatment and storage areas h. Leak detection and repair (LDAR) programme 	<p>optimizing the use of containers with walking floors, reducing drop heights and attrition of wastes, effectively packaging and sealing bagged wastes, containing dust within the building and requiring delivery vehicles to use the wheel cleaning system.</p> <p>Equipment will be selected for the duty required, taking into account the characteristics of the waste and associated emissions. The design and operating arrangements for all plant and equipment have been determined on the basis of affording a high priority to control fugitive emissions to air as described in section 2 above.</p> <p>Metallurgy is specified to reflect the nature of the waste being processed. The design philosophy for dusts management prioritises containment and collection of dust.</p> <p>A misting system will be operational in areas of the site associated with potential elevated dust emissions, where it is not feasible or viable to install extraction and abatement equipment. All plant and equipment will be maintained in accordance with manufacturers' recommendations. High standards of housekeeping will be incorporated in the operating techniques. The waste and associated dust generated have a high-cost value, so it is in the interest of BRM to recover as much dust as possible.</p> <p>Not applicable</p>
<p>BAT Conclusion 14g</p>	<p>In order to prevent or, where that is not practicable, to reduce diffuse emissions to air, in particular of dust, organic compounds and odour, BAT is to use an appropriate combination of the techniques for cleaning</p>	<p>High standards of housekeeping will be incorporated in the operating techniques to be developed</p>

Reference	Requirement and applicability	Comment
	of waste treatment and storage areas, including regularly cleaning the whole waste treatment area (halls, traffic areas, storage areas, etc.), conveyor belts, equipment and containers.	when the design is finalised. This requirement is noted and will be taken into account in developing Operating Techniques and Standard Operating Procedures.
Appropriate Measures – WEEE*, Inert and Non-hazardous Wastes**, Chemical Wastes (directly relevant to Complex Wastes only) ***		
7.1.2**	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.	It is not anticipated that fugitive emissions generated at the installation have the potential for pollution at location of sensitive receptors given the design and operating arrangements outlined.
6.2.2* 2***	You must design, operate and maintain storage and treatment plant in a way that prevents fugitive emissions to air, including dust, organic compounds and odour. Where that is not possible, you must minimise these emissions. Storage and treatment plant includes associated equipment and infrastructure such as: <ul style="list-style-type: none"> - shredders - sorting equipment - conveyors - skips or containers - building fabric, including doors and windows - pipework and ducting 	This requirement has been taken into account in the design and operation of the facility. Shredders and the picking line will be installed with hoods to enable extraction of dust to the abatement plant. Conveyors will be covered. Wastes will not be received in skips and containers. The building architecture has been designed to optimise containment of dust.
6.2.3* 3***	You must make sure fugitive emissions are collected and directed to appropriate abatement and your treatment plant must use high integrity components (for example, seals or gaskets).	This requirement is addressed in the design and specification of the dust extraction and abatement system.
6.2.4* 4***	You must use your waste pre-acceptance, waste acceptance and site inspection checks and procedures to identify and manage wastes that could cause, or are causing, fugitive emissions to air. When you identify any of these wastes you must: <ul style="list-style-type: none"> - take appropriate, risk assessed measures to prevent and control emissions - prioritise their treatment or transfer 	This requirement will be taken into account in the operating techniques to be developed for the installation.
6.2.5* 5***	Where necessary, to prevent fugitive emissions to air from the storage and handling of odorous or dusty wastes, you should use a combination of the following measures: <ul style="list-style-type: none"> - store and handle such wastes within a building or enclosed equipment 	These requirements have been considered in the design and operating arrangements for the facility.

Reference	Requirement and applicability	Comment
	<ul style="list-style-type: none"> -keep buildings and equipment under adequate negative pressure with an appropriate abated air circulation or extraction system -where possible, locate air extraction points close to potential emissions sources -use fully enclosed material transfer and storage systems and equipment, for example, conveyors, hoppers, containers, tanks and skips -keep building doors and windows shut to provide containment, other than when access is required for loading or unloading -minimising drop height -use misting systems and wind barriers 	
6.2.6* 12***	Where a dust management plan is required, you must develop and implement it following our guidance on emissions management plans for dust.	A Dust Management Plan is provided at Appendix I. This will be updated to reflect the final arrangements and to incorporate operating techniques for the facility.
7.1.3**	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. 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/m ³ to 100 µg/m ³ (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.	This requirement will be addressed as part of the Commissioning Plan. It is anticipated an Improvement Condition will be included in the Permit requiring a Commissioning Plan to be prepared.
6.2.7* 6***	You must set up a leak detection and repair programme. You must use it to promptly identify and mitigate any fugitive emissions from treatment plant and associated infrastructure (such as pipework, conveyors, tanks).	This requirement will be complied with, where relevant
6.2.8* 7***	You must regularly inspect and clean all waste storage and treatment areas, equipment (including conveyor belts) and containers. You must contain any residues collected during cleaning.	This requirement will be addressed in the Operating Techniques and Standard Operating Procedures to be developed for the facility
6.2.9* 8***	Your maintenance and cleaning schedules must make sure that your plant is regularly cleaned to avoid large-scale decontamination activities.	This requirement will be addressed in the Operating Techniques and Standard Operating Procedures to be developed for the facility
6.2.10* 9***	You must take measures to prevent the corrosion of plant and equipment (for example, conveyors or pipes). This includes: <ul style="list-style-type: none"> -selecting and using appropriate construction materials -lining or coating equipment with corrosion inhibitors regularly inspecting and maintaining plant 	This requirement has been taken into account in the design and specification of plant and equipment. A maintenance regime will be implemented.
6.2.11*	You must have an appropriate regular maintenance programme covering all buildings, plant and equipment.	This requirement will be complied with.

Reference	Requirement and applicability	Comment
	This must also include protective equipment such as air ventilation and extraction systems, curtains and fast-action doors used to prevent and contain fugitive releases.	
Appropriate Measures – Chemical Waste		
1	You must use appropriate measures to prevent emissions of dust, mud and litter and odour.	<p>The site external to the building is founded on hardstanding to prevent tracking of mud. A wheel cleaning system will be installed within the reception area.</p> <p>The wastes for acceptance are not odorous and will not generate litter. As described at Sections 2 and 3, a range of dust control measures that collectively provide a robust package of measures for unloading, storage, handling and loading of waste streams to prevent point source and fugitive emissions to air. In addition, extraction and abatement plant specified to achieve the BAT-AEL for dust will be installed to remove dust/fines laden air generated during shredding of E-Scrap.</p>
10	If you wash containers or tanks, you must design and operate the washing process and associated equipment in a way that prevents fugitive emissions to air. For example, you could do this activity in a contained or enclosed system.	Not applicable. These activities will not be undertaken at the facility
11	You must fully enclose and contain pre- and post-treatment shredder plant to prevent emissions. You must design and operate the shredder plant using appropriate process interlocks. The plant should not operate unless it is enclosed and contained, for example, only working when the loading door on the hopper has been closed or sealed. Dust and microbial emissions from the shredder plant must be contained and extracted to an appropriate abatement system, for example HEPA air filtration	These requirements are addressed in the design of the plant, though it should be acknowledged the shredder will not treat Complex Wastes.
13-19	Odorous wastes	Not applicable. Complex Wastes and other wastes accepted at the facility are not odorous.

5. Planning stakeholder engagement – Noise

BRM has engaged extensively with Kent County Council on matters relating to the Planning Application submitted for the E-Scrap facility on 13th April 2023.

Initially, engagement with the Planning Authority on matters relating to the Environmental Permit application focussed on matters associated with noise and dust and effects on ecology. Following submission of the application, responses were received from the following stakeholders with interests on these matters:

- Gravesham Borough Council. Gravesham Borough Council Environmental Protection Team did not raise any objections to the development and made the following comments:
 - ▶ There is a low risk to human health and a medium risk to ecology associated with dust arising from demolition, construction works and tracking.
 - ▶ No comments were made in relation to noise.
- Kent County Council. Kent County Council Ecology Advisory Service Team did not raise any objections to the development nor comment on effects of noise or dust.
- Natural England. Natural England provided a generic response and deferred to Gravesham Borough Council to assess whether the development is consistent with national and environmental policies.
- Kent Wildlife Trust. Kent Wildlife Trust did not raise any objections to the development, though commented that direct and indirect effects such as noise and dust generated during construction works may affect protected and priority species associated with the Swanscombe Peninsula SSSI and Botany Marsh Local Wildlife Site. Following signposting to the Assessment of Ecological Impacts included with the planning application that considers effects of dust and noise, Kent Wildlife Trust has confirmed it is content that activities will not give rise to adverse effects following acceptance of the applicants proposal to undertake piling works outside of the breeding season.

Further information is provided in the Response to further information to inform the decision to the determine the Environmental Permit application as duly made.

6. Abbreviations

Abbreviation	Definition	Abbreviation	Definition
FIBC	Flexible Intermediate Bulk Container	IBC	Intermediate Bulk Container
NCR	Non-conformance Report	FEL	Front end loader
FLT	Forklift truck	WMS	Waste Material Specification

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