

Project No: 313306

Technical Standards

Prepared for:

2ZLF Ltd

West Meadows Industrial Estate
Derby
DE21 6HA

Contents Amendment Record

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SAFETY
SCHEMES IN
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Acknowledgement

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This report has been prepared by the following Mabbett personnel:

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Executive Summary

The installation will continue to accept, treat and transfer a range of hazardous and non-hazardous waste streams. Hazardous materials accepted are generally at the lower end of the hazardous waste threshold, i.e., for PAH and PTE content.

The relevant Technical Standards for this operation are:

- Waste Treatment BREF BAT-Conclusions (EUR-Lex - 32018D1147 - EN - EUR-Lex (europa.eu) [S5.3 and S5.6 activities]¹
- The hazardous waste storage and treatment and the requirements of 'Chemical waste: appropriate measures for permitted facilities'².

The sites infrastructure has been developed from the outset so that the site is capable of handling and treating a range of non-hazardous and hazardous waste streams.

Waste management activities include physico-chemical treatment off-site, bulking of the recovered materials and the storage of waste and waste materials prior to despatch are undertaken at the site.

The site is operated in accordance with an Environmental Management System which is accredited to ISO 14001:2015, providing written procedures for the management of the facility, including effective maintenance of plant, equipment and site infrastructure. All operations at the site are managed by a Technically Competent Manager [TCM] who ensures that the procedures in the EMS are followed.

As the operation will be classed as an 'installation' it is required that it meets the relevant technical standards; in this case those referenced within the Waste Treatment BREF BAT Conclusions.

¹ [COMMISSION IMPLEMENTING DECISION \(EU\) 2018/ 1147 - of 10 August 2018 - establishing best available techniques \(BAT\) conclusions for waste treatment, under Directive 2010/ 75/ EU of the European Parliament and of the Council - \(notified under document C\(2018\) 5070\) \(europa.eu\)](#)

² [Chemical waste: appropriate measures for permitted facilities - Guidance - GOV.UK \(www.gov.uk\)](#)

Table of Contents

Section 1.0: Introduction	1
Section 2.0: Technical Standards	2

Section 1.0: Introduction

The operation will change from a waste 'facility' to a waste 'installation' due to a proposed increase in the storage and throughput capacities of hazardous wastes at the site above the relevant thresholds.

Non-hazardous waste treatment and storage will remain as allowed under the current permit.

Hazardous waste storage will increase to 150t, from 50t, and throughput will exceed 10t/day to a maximum 100t/day.

SECTION 5.3 Disposal or recovery of hazardous waste

Part A(1)

(a) Disposal or recovery of hazardous waste with a capacity exceeding 10 tonnes per day involving one or more of the following activities—

(ii) physico-chemical treatment;

SECTION 5.6 Temporary or underground storage of hazardous waste

Part A(1)

(a) Temporary storage of hazardous waste with a total capacity exceeding 50 tonnes pending any of the activities listed in Sections 5.1, 5.2, 5.3 and paragraph (b) of this Section, except—

(i) temporary storage, pending collection, on the site where the waste is generated, or

(ii) activities falling within Section 5.2.

As required of the relevant application forms the Best Available Techniques (BAT) assessment is included. The site currently operates under an Environmental Permit [EPR/AB3904UQ] [WML400948], issued by the Environment Agency in 2015, that allows it to accept wastes as described in the permit. There is no proposal to add any wastes to those currently accepted.

The Permit has subsequently been varied to include additional EWC codes and extend the site boundary [EPR/AB3904UQ/V004].

The operation is currently permitted as an A16 Physical Treatment Facility which is *permitted to receive and treat wet and de-watered street sweepings and gully wastes and trommel fines to recover and recycle aggregates and other materials.*

The purpose of this variation application is to increase the volume of hazardous wastes stored and subsequently treated for further recovery and disposal where required.

There are no amendments to;

- EWC codes accepted, (please note there are some amendments to descriptions)
- Overall tonnage accepted at the site
- Site boundary

Section 2.0: Technical Standards

BAT ref	Indicative BAT	BAT justification
1	<i>In order to improve the overall environmental performance, BAT is to implement and adhere to an environmental management system (EMS) that incorporates all of the features specified.</i>	2ZLF has an externally accredited EMS in place, in the form of ISO14001 and that all of the requisite features are incorporated.
2	<i>In order to improve the overall environmental performance of the plant, BAT is to use all of the techniques given below:</i>	
a	<i>Set up and implement waste characterisation and pre-acceptance procedures</i>	<p>The waste pre-acceptance and acceptance procedures are described in more detail within the operating techniques document (Appendix 9 of the application) and are summarised here:</p> <p>Pre-acceptance and waste characterisation procedures: Upon receipt of an enquiry the operator will obtain the following written information:</p> <ul style="list-style-type: none"> • Waste type (EWC code) and origin of the waste; • The operator will also obtain information regarding any processes that have been undertaken to obtain the waste. Or if the waste is from another treatment site, the process that has produced the waste; • The operator will determine the quantity of waste and determine if there is sufficient capacity to be able to accept the waste in line with permit conditions; • All wastes will be accompanied by an appropriate chemical analysis to determine its key contaminants which will ensure that prior to acceptance the waste is suitable for the treatment options available on site; • The written enquiry will include the physical formation of the waste;

		<ul style="list-style-type: none"> • The enquiry will include the hazards that the wastes will pose, including the relevant Hazard Codes; and • Information regarding how verification samples are to be stored and preserved. <p>The operator will always ask for an independent analysis to have been undertaken by a third party.</p> <p>The information from analysis will be compared to the written information provided by the producer to determine the suitability of the waste for treatment at the site. If an independent third-party analysis is not available, the operator will obtain their own samples of the waste which will be analysed to ensure that the waste matches what is within the written documentation. Regardless, the operator will undertake verification sampling at a frequency of one sample per 500 tonnes of waste. If the waste is suitable for the treatment process, the waste will be accepted.</p>
b	Set up and implement waste acceptance procedures	<ul style="list-style-type: none"> • All loads are weighed upon arrival at the site. The weighbridge is calibrated, and the site is always manned during operational hours. The storage capacity of the site is assessed daily, and waste will only be accepted if there is sufficient capacity; • The specified information will be obtained from all drivers arriving at the site, as prescribed in the site's waste acceptance procedures. If the waste load arrives without the necessary paperwork, it will be rejected; • The documentation is checked on arrival and if it is incorrect or the waste does not match the written description then the waste will be rejected;

		<ul style="list-style-type: none"> All staff undertaking waste acceptance procedures will receive suitable training in the waste acceptance procedures, as well as in waste handling and the relevant health and safety and environmental procedures in place; Wastes travel from the waste producer to the facility with consignment notes, which detail all relevant information, including waste producer details, site where waste is from, time and date of loading, carrier details, site reference numbers, waste details, disposal site and time and date of arrival at the disposal site; 								
c	<i>Set up and implement a waste tracking system and inventory</i>	<p>Waste tracking system:</p> <ul style="list-style-type: none"> The consignment notes and any accompanying documentation will be scanned and stored electronically. The documentation will be made available to the EA upon request; Documents are scanned in and stored electronically on the company server; Spreadsheets are completed which detail the above information, and which also includes load weights and total job weights, hazards, location of the waste on site, disposal (or where the waste is within the recovery route) and identification of staff who have been responsible for the decision to reject or accept the waste. 								
d	<i>Set up and implement an output quality management system</i>	<p>Recovered outputs from the washing process:</p> <p>The washing process produces the following:</p> <table border="1"> <thead> <tr> <th>Recovered material</th> <th>Properties</th> <th>Destination</th> <th>Quality standards</th> </tr> </thead> <tbody> <tr> <td>Oversize Material +80mm</td> <td>Rocks, soil lumps and other oversize</td> <td>Rework into the process again and disposal</td> <td>N/A</td> </tr> </tbody> </table>	Recovered material	Properties	Destination	Quality standards	Oversize Material +80mm	Rocks, soil lumps and other oversize	Rework into the process again and disposal	N/A
Recovered material	Properties	Destination	Quality standards							
Oversize Material +80mm	Rocks, soil lumps and other oversize	Rework into the process again and disposal	N/A							

		20-80mm	Stones, rocks	C&D Waste recycler	Compliance with the WRAP Quality Protocol for Aggregates from Inert Waste: LIT_8709_c60600.pdf (publishing.service.gov.uk)
		5-20	Aggregate – clean	Potentially end of waste	Compliance with the WRAP Quality Protocol for Aggregates from Inert Waste: LIT_8709_c60600.pdf (publishing.service.gov.uk)
		63 μ to 5mm	Sand – clean	Potentially end of waste	Compliance with the WRAP Quality Protocol for Aggregates from Inert Waste: LIT_8709_c60600.pdf (publishing.service.gov.uk)
		<63 μ	Filter Cake	Dependent on waste being treated	N/A: Removed from the site as a waste material
		Water	Treated within plant	Reuse within process	N/A
		Oil	Recovered	Dispose to oil recovery company	N/A as transferred for further recovery

		DAF Scum	Contaminated material for disposal	Haz waste disposal	N/A
		<p>Tables 6 – 9 of Appendix 9: “Operating Techniques” outline the process monitoring that is undertaken to provide confirmation that all outputs of the facility attain suitable parameters for onwards recovery or disposal.</p> <p>There are no waste gas streams associated with this process.</p>			
e	<i>Ensure waste segregation</i>	<p>Waste is stored in accordance with the Site Layout Plan (included as Document D). This delineates storage areas by type so that non-hazardous waste is kept separate from hazardous waste and to ensure that no incompatible wastes are stored adjacent to each other. This is based on the storage layout that has worked effectively since the commencement of site activities, in 2015, under [EPR/AB3904UQ] / [WML400948].</p> <p>The waste to be received on site are from similar processes and are therefore compatible. A record shall be kept which ensures that waste loads can be tracked to ensure that any wastes can be segregated if required.</p>			
f	<i>Ensure waste compatibility prior to mixing or blending of waste</i>	<p>All waste will be visually inspected at the weighbridge. If the waste is accepted, it will be directed to the reception area as shown on Drawing No 2ZLF/IV.187.20/LAY/01 where it will be unloaded, and an additional inspection will be undertaken. If the waste does not comply with the information on the waste consignment notes or with the conditions of the permit, it shall be immediately transferred to the quarantine area, or if the driver is still on the premises, the waste</p>			

Commented [NC1]: Unhighlight when done

		will be reloaded back onto the truck and removed from site. The producer will be notified, and a record of the date, time and producer will be made and stored in the site's office.
g	Sort incoming solid waste	All waste will be visually inspected at the weighbridge. If the waste is accepted, it will be directed to the reception area as shown on Drawing No 2ZLF/IV.187.20/LAY/01 where it will be unloaded, and an additional inspection will be undertaken. If the waste does not comply with the information on the waste consignment notes or with the conditions of the permit, it shall be immediately transferred to the quarantine area, or if the driver is still on the premises, the waste will be reloaded back onto the truck and removed from site. The producer will be notified, and a record of the date, time and producer will be made and stored in the site's office.
3	<p><i>In order to facilitate the reduction of emissions to water and air, BAT is to establish and to maintain an inventory of waste water and waste gas streams, as part of the environmental management system (see BAT 1), that incorporates all of the following features:</i></p> <p><i>(i) information about the characteristics of the waste to be treated and the waste treatment processes, including:</i></p> <p><i>(a) simplified process flow sheets that show the origin of the emissions;</i></p> <p><i>(b) descriptions of process-integrated techniques and waste water/waste gas treatment at source including their performances;</i></p> <p><i>(ii) information about the characteristics of the waste water streams, such as:</i></p>	<p>Wastewater is recycled as much as possible via treatment in the site's effluent treatment facility, where the water is treated to a point where it can be reused on site.</p> <p>The water is tested monthly to ensure that;</p> <p>a) the contamination level within the water will not lead to pollution of the waste streams that are being treated, and;</p> <p>b) to ensure that the water is suitable for dust suppression and does not contain any contaminants which could cause environmental pollution.</p> <p>Water not used on-site is discharged to sewer via a discharge consent.</p> <p>There are no waste gas streams associated with this process.</p>

	<p>(a) average values and variability of flow, pH, temperature, and conductivity;</p> <p>(b) average concentration and load values of relevant substances and their variability (e.g. COD/TOC, nitrogen species, phosphorus, metals, priority substances/micropollutants);</p> <p>(c) data on bio eliminability (e.g. BOD, BOD to COD ratio, Zahn-Wellens test, biological inhibition potential (e.g. inhibition of activated sludge)) (see BAT 52);</p> <p>(iii) information about the characteristics of the waste gas streams, such as:</p> <p>(a) average values and variability of flow and temperature;</p> <p>(b) average concentration and load values of relevant substances and their variability (e.g. organic compounds, POPs such as PCBs);</p> <p>(c) flammability, lower and higher explosive limits, reactivity;</p> <p>(d) presence of other substances that may affect the waste gas treatment system or plant safety (e.g. oxygen, nitrogen, water vapour, dust).</p>	
4	<i>In order to reduce the environmental risk associated with the storage of waste, BAT is to use all of the techniques given below.</i>	
a	<i>Optimised storage location</i>	<p>The tipping/waste storage is carried out on an impermeable concrete slab which drains to a sealed sump which will collect contaminants and liquids from incidental rainfall. Slightly wet waste materials can also run into the sump and are then removed and processed.</p> <p>All sampling and waste storage area are marked on Drawing Number 2ZLF/IV.187.20/LAY/01, which indicates the site layout. The site layout has been</p>

		<p>designed to provide a link between the treatment activity and storage areas to ensure wastes receive minimal handling.</p> <p>The facility is not located within a residential area or in proximity to sensitive receptors, however all storage areas have been specifically chosen to either be furthest away from these receptors, or are situated within an area of the yard which will shield the receptors from the activities.</p>
<p><i>b</i></p>	<p><i>Adequate storage capacity</i></p>	<p>Materials are stored in accordance with their treatment route and are stored in such a way as to provide avoid double handling i.e. wastes are received, stored, treated and moved to the post treatment area.</p> <p>Wastes will only be removed from the storage area if sufficient capacity is available for them to be treated. Treatment of wastes will occur within 30 working days of the material being accepted on site. Once treated, the material is bulked as shown on Drawing Number 2ZLF/IV.187.20/LAY/01 until it is removed from site.</p> <p>All storage areas will be clearly marked as to their contents, hazardous characteristics, quantity and the date the waste was put in the storage area.</p> <p>There will be a maximum of 150 tonnes of hazardous waste on site at any one time.</p> <p>The site will have an annual throughput of 10 000 tonnes of hazardous waste, with a total daily treatment capacity of 35 tonnes.</p> <p>The operator will keep account of all waste on the site at any one time and within the process. The spreadsheet calculating how much waste is on site will be updated daily and will consider waste received on site (volumes will be known from weighbridge information) and wastes removed from site. The updated information will be located in the site office. The whiteboard in the site office will be updated daily with these figures so that staff are always aware how much storage is available.</p>

c	<i>Safe storage operation</i>	<p>The waste discharge areas are impermeable concrete slabs which drains to sealed drainage sumps and any runoff will be contained within dedicated storage tanks which are fitted with high level alarms. All vehicles delivering waste travel over a calibrated weighbridge and a ticket is printed for a record. The driver is then directed to the designated unloading area by the site operation staff. The site is always manned during operational hours.</p> <p>The facility is completely enclosed with fencing and has lockable gates to prevent unauthorised access as well as CCTV.</p> <p>The storage area will benefit from an impermeable surface with sealed drainage. Any contaminant runoff from waste materials will be contained within the sumps.</p> <p>The perimeter of the site will benefit from elevated kerbs and bunding to ensure that no contaminated surface water runs off the site.</p> <p>Runoff from the treatment and storage yards will be tested to determine levels of contamination and to ensure compliance with the trade effluent discharge consent. Storage of wastes will be undertaken in accordance with the operating techniques (Appendix 9) which details how the site will be operated in relation to fire risk and how potential fires may be mitigated.</p>
d	<i>Separate area for storage and handling of packaged hazardous waste</i>	Not applicable
5	<i>In order to reduce the environmental risk associated with the handling and transfer of waste, BAT is to set up and implement handling and transfer procedures.</i>	<p>Handling and transfer activities are overseen by the technically competent site manager(s).</p> <p>Handling and transfer of wastes will be in accordance with the waste duty of care (by raising waste transfer note/consignment notes prior to transfer and following this up with quarterly returns/hazardous waste returns.</p>

		<p>To prevent, detect and mitigate spills, all waste handling takes place on an impermeable surface with sealed drainage (as detailed in the Site Drainage Plan, included as Document E).</p> <p>Waste types are not mixed/blended as part of the process.</p> <p>Handling and transfer procedures are carried out in accordance with the findings of the risk assessment (included as Appendix 7 to the application).</p>
6	<p><i>For relevant emissions to water as identified by the inventory of waste water streams (see BAT 3), BAT is to monitor key process parameters (e.g. waste water flow, pH, temperature, conductivity, BOD) at key locations (e.g. at the inlet and/or outlet of the pre-treatment, at the inlet to the final treatment, at the point where the emission leaves the installation)</i></p>	<p>Wastewater is recycled as much as possible via treatment in the site's effluent treatment facility, where the water is treated to a point where it can be reused on site. The water is tested monthly to ensure that a) the contamination level within the water will not lead to pollution of the waste streams that are being treated, and b) to ensure that the water is suitable for dust suppression and does not contain any contaminants which could cause environmental pollution. Monitoring will be undertaken for the following substances which are representative of the contamination within the waste:</p> <ul style="list-style-type: none"> • pH; • Suspended Solids; • Chemical Oxygen Demand; • Biological Oxygen Demand; • Phosphorus; • VOC; and • No visible oil and grease
7	<p><i>BAT is to monitor emissions to water with at least the frequency given below, and in accordance with EN standards. If EN standards are not available, BAT is to use ISO, national or other international standards that ensure the provision of data of an equivalent scientific quality.</i></p>	<p>The Operator will ensure that emissions to water, for each of these relevant parameters, will be monitored at these stipulated frequencies and to the standards specified.</p>

8	<i>BAT is to monitor channelled emissions to air in accordance with EN standards. If EN standards are not available, BAT is to use ISO, national or other international standards that ensure the provision of data of an equivalent scientific quality.</i>	Not applicable; no channelled emissions to air.
9	<i>BAT is to monitor diffuse emissions of organic compounds to air from the regeneration of spent solvents, the decontamination of equipment containing POPs with solvents, and the physico-chemical treatment of solvents for the recovery of their calorific value, at least once per year using one or a combination of the techniques given below.</i>	Not applicable.
10	<i>BAT is to periodically monitor odour emissions.</i>	There have been no substantiated odour complaints at the facility throughout its operation under environmental permit [EPR/AB3904UQ] / [WML400948] since 2015. It is not anticipated that there will be odour nuisance at sensitive receptors, as a result of the site activities. As such, the periodic monitoring of odour emissions is not applicable.
11	<i>BAT is to monitor the annual consumption of water, energy and raw materials as well as the annual generation of residues and waste water, with a frequency of at least once per year.</i>	The annual consumption of water, energy and raw materials and also the annual generation of residues and wastewater will be recorded and reported, as necessary, on an annual basis. With regard to water, the site will record and report all fresh and/or mains water that is utilised on site and shall state what it has been utilised for i.e., dust suppression, yard cleaning etc and will report this on an annual basis in accordance with the annual reporting requirements.
12	<i>In order to prevent or, where that is not practicable, to reduce odour emissions, BAT is to set up, implement and regularly review an odour management plan, as part of the environmental management system (see BAT 1), that includes all of the following elements:</i>	Not applicable; as detailed in response to BAT 10, there have been no substantiated odour complaints at the facility throughout its operation under environmental permit [EPR/AB3904UQ] / [WML400948] since 2015. It is not anticipated that there will be odour nuisance at sensitive receptors, as a result of

	<ul style="list-style-type: none"> – a protocol containing actions and timelines; – a protocol for conducting odour monitoring as set out in BAT 10; – a protocol for response to identified odour incidents, e.g. complaints; – an odour prevention and reduction programme designed to identify the source(s); to characterise the contributions of the sources; and to implement prevention and/or reduction measures. 	the site activities. As such, the periodic monitoring of odour emissions is not applicable.
13	<i>In order to prevent or, where that is not practicable, to reduce odour emissions, BAT is to use one or a combination of the techniques given</i>	Not applicable (see response to BAT 10 and BAT 12)
14	<p><i>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.</i></p> <p><i>Depending on the risk posed by the waste in terms of diffuse emissions to air, BAT 14d is especially relevant.</i></p>	<p>A dust management plan has been developed for the site. In summary, dust management will contain the following measures:</p> <ul style="list-style-type: none"> • Water will be used to dampen stockpiles where required and especially during windy events; • The bays will act as windbreaks and the operator will ensure that they maintain headroom in the bays to avoid wind catching the waste; • All conveyors will be enclosed and will be fitted with filters to avoid dust emissions. Drop heights will be minimised when handling wastes; • The operator will ensure regular housekeeping is undertaken, dust will be removed regularly from machinery and a check will be kept on buildings and site infrastructure. Infrastructure may be hosed down if necessary; and <p>The site will not store powders or particularly dusty wastes.</p> <p>The Dust Management Plan is included as Appendix 11.</p>

		An Odour Management Plan (OMP) has also been drafted and this details the measures to reduce the likelihood of any diffuse emissions of odour. The OMP is included as Appendix 13.
15	<i>BAT is to use flaring only for safety reasons or for non-routine operating conditions (e.g. start-ups, shutdowns) by using both of the techniques given.</i>	Not applicable; no flaring.
16	<i>In order to reduce emissions to air from flares when flaring is unavoidable, BAT is to use both of the techniques given.</i>	Not applicable; no flaring.
17	<p><i>In order to prevent or, where that is not practicable, to reduce noise and vibration emissions, BAT is to set up, implement and regularly review a noise and vibration management plan, as part of the environmental management system (see BAT 1), that includes all of the following elements:</i></p> <ul style="list-style-type: none"> <i>I. a protocol containing appropriate actions and timelines;</i> <i>II. a protocol for conducting noise and vibration monitoring;</i> <i>III. a protocol for response to identified noise and vibration events, e.g. complaints;</i> <i>IV. a noise and vibration reduction programme designed to identify the source(s), to measure/estimate noise and vibration exposure, to characterise the contributions of the sources and to implement prevention and/or reduction measures.</i> 	A Noise and Vibration Management Plan is included as Appendix 12. However, there have been no substantiated noise or vibration complaints from the site since it became operational in 2015.
18	<i>In order to prevent or, where that is not practicable, to reduce noise and vibration emissions, BAT is to use one or a combination of the techniques given</i>	A Noise and Vibration Management Plan is included as Appendix 12. However, there have been no substantiated noise or vibration complaints from the site since it became operational in 2015.

<p>19</p>	<p><i>In order to optimise water consumption, to reduce the volume of waste water generated and to prevent or, where that is not practicable, to reduce emissions to soil and water, BAT is to use an appropriate combination of the techniques given:</i></p>	<ul style="list-style-type: none"> • Water is recirculated within the Installation by recycling wastewater as possible via treatment in the site's effluent treatment facility, where the water is treated to a point where it can be reused on site. The water is tested monthly to ensure that; (a) the contamination level within the water will not lead to pollution of the waste streams that are being treated, and (b) to ensure that the water is suitable for dust suppression and does not contain any contaminants which could cause environmental pollution; • Surface water runoff from the yard will be utilised for dust suppression and as firefighting water. • Working surfaces are impermeable.
<p>20</p>	<p><i>In order to reduce emissions to water, BAT is to treat waste water using an appropriate combination of the techniques given:</i></p>	<p>Water utilised within the system will be treated to remove metals from solution via precipitation and oils via cohesion to the plates and the pH will be adjusted accordingly.</p>
<p>21</p>	<p><i>In order to prevent or limit the environmental consequences of accidents and incidents, BAT is to use all of the techniques given below, as part of the accident management plan (see BAT 1)</i></p>	<p>An Accident Management Plan has been submitted with the application; in summary it identifies:</p> <ul style="list-style-type: none"> • Likely causes of accidents; • The consequences of such accidents; • Prevention measures in place to reduce the likelihood of accidents; and • How any accidents that do occur will be managed. <p>Protection measures:</p> <p>The site is surrounded by a perimeter fence and has a lockable gate to the entrance. This gate is closed and locked always when staff are not present on site. The site is fitted with remote CCTV system so staff are alerted to the presence of intruders.</p>

		<p>Management of incidental/accidental emissions:</p> <p>The process does not give rise to emissions to air (except for potential emissions of dust or odour) which are controlled through the measures stipulated in the respective dust and odour management plans.</p> <p>With regard to potential incidental/accidental emissions to land/water:</p> <p>All hazardous storage areas will be provided with an impermeable surface (concrete) with sealed drainage. The impermeable concrete surface will meet the following intended design objectives:</p> <ul style="list-style-type: none"> • Impermeable to incidental rainfall • Sufficient strength to accommodate plant and equipment • Designed with kerbing or edge bunds to retain all incidental rainfall; and • Designed with sealed joints where applicable and with sufficient falls so that collected surface water can only discharge to engineered sump(s). <p>Incident/accident registration and assessment system:</p> <p>All near misses or incidents will be reported to the site manager, who will enter the information onto a central data base. All incidents or near misses will be investigated and reported on within monthly staff meetings</p>
22	<i>In order to use materials efficiently, BAT is to substitute materials with waste.</i>	Not applicable: This process takes in waste and enables its recovery, where feasible and adopts a zero waste to landfill approach, in accordance with the waste hierarchy. There is no scope to substitute materials with waste.
23	<i>In order to use energy efficiently, BAT is to use both of the techniques given below:</i>	An energy efficiency plan will be incorporated into the Installation's Environmental Management System.

		<p>The Installation is inherently energy efficient and is considered a 'green remediation' technique.</p> <p>It is estimated that the energy consumption of the facility will be 50 000 MWh/yr. This will be recorded as a means of auditing energy use and setting key performance indicators.</p>
24	<i>In order to reduce the quantity of waste sent for disposal, BAT is to maximise the reuse of packaging, as part of the residues management plan (see BAT 1).</i>	Not applicable; no packaging waste generated as part of the Installation activities.
25 - 39	<i>(BAT 25 to 39 not relevant to the Installation activities)</i>	
40	<i>In order to improve the overall environmental performance, BAT is to monitor the waste input as part of the waste pre-acceptance and acceptance procedures (see BAT 2).</i>	This is achieved; as described in response to BAT 2.
41	<i>In order to reduce emissions of dust, organic compounds and NH3 to air, BAT is to apply BAT 14d and to use one or a combination of the techniques given.</i>	<p>Emissions to air will be limited to diffuse emissions of odour and dust.</p> <p>In keeping with BAT 14(d), the processing of wastes that may create diffuse emissions to air (for example of odour or dust) will be carried out in the equipment housed in the main processing building.</p> <p>There are no point-source emissions to air and the only technique of relevance to mitigate against dust is the use of water misting – which is employed.</p> <p>There are no channelled emissions of dust, so Table 6.8 is not relevant.</p>
50	<i>In order to reduce emissions of dust and organic compounds to air from the storage, handling, and washing steps, BAT is to apply BAT 14d and to use one or a combination of the techniques given.</i>	As detailed in BAT 41, above, emissions to air will be limited to diffuse emissions of odour and dust.

		<p>In keeping with BAT 14(d), the processing of wastes that may create diffuse emissions to air (for example of odour or dust) will be carried out in the equipment housed in the main processing building.</p> <p>There are no point-source emissions to air and the only technique of relevance to mitigate against dust is the use of water misting – which is employed.</p> <p>There are no channelled emissions of dust.</p>
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