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Client:	**AWSM Recycling Limited**
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Report Issue History

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1 Introduction

1.1 Background

The table below provides an assessment of the proposed waste storage and transfer operations to be undertaken by AWSM Recycling Limited at their site located at Lane Head Farm, Lanehead Lane, Hutton Magna, County Durham, England, DL11 7HF against the relevant set of appropriate measures.

The application is for a waste transfer operation, without treatment. The proposed operation is very straightforward and can be broken down into two headings as follows:

- Liquid Bio Waste Storage and Transfer.

Waste materials are to be stored and bulked in the proposed waste storage and nurse tanks. Wastes will be stored individually and there will be no waste treatment on site. The bulked singular waste streams are then transferred off site to a Anaerobic Digestion plants or for land spreading, under deployments agreed with the Environment Agency.

- Transfer of Skips.

Provision has been made should it be necessary for a skip lorry to transfer its load from one vehicle to another. For example a driver has run out of hours or in the event that the licenced receiving facility for recovery / disposal, is unable to take receipt of a skip, then the skip would be placed on the ground in the designated area marked on the layout plan prior to uplift by another vehicle.

To confirm, all waste would remain in its primary container inside the skip and would not be bulked / treated. For avoidance of any doubt, no waste would be removed from the containment it is received within the skip, during this operation.

All storage and transfer operations will be undertaken on an impermeable surface within an area provided with secondary containment.

Based on the above, the Appropriate Measures for the assessment have been taken from relevant guidance documents as specified below:

- Biological waste treatment: appropriate measures for permitted facilities - https://www.gov.uk/guidance/biological-waste-treatment-appropriate-measures-for-permitted-facilities/1-when-appropriate-measures-apply
- Non-hazardous and inert waste: appropriate measures for permitted facilities - https://www.gov.uk/guidance/non-hazardous-and-inert-waste-appropriate-measures-for-permitted-facilities

Given the simple nature of the transfer of skips and the fact activities are undertaken on an impermeable surface within an area provided with secondary containment, the appropriate measures in Biowaste guidance are used to provide the assessment below as they are considered adequate to cover site skip operations

2 Process Description

2.1 Site Assessment v Appropriate Measures

This Section of the report compares the site operations against the Appropriate Measures set out above. The comparison has been undertaken and presented in Table 2.1 below, by listing the relevant Appropriate Measure requirements and detailing how the proposed site operations meet the criteria stated.

It is worth noting that this is a simple waste storage and transfer operation, therefore, parts of requirements will not be relevant given there will be no treatment on site.

2.2 Process Overview

Biowaste Appropriate Measure	Site Assessment v Appropriate Listed Measure
4. Site location, design and capacity	
Site Location 1. You should consider the potential impacts on local sensitive receptors when selecting a new site.	Site location selected to minimise potential impacts to local receptors. Potential impacts have been considered and shown to have insignificant risk of impact on receptors, as per the Environmental Risk Assessment submitted in support of the Permit application.
2. You must choose the location of your site so you prevent or minimise fugitive emissions to air. This includes dust, bioaerosols, odours and other gaseous emissions including ammonia.	Site location and associated infrastructure selected to minimise fugitive emissions to air. Potential fugitive emission impacts have been assessed and shown to have insignificant risk of impact on receptors, as per the Environmental Risk Assessment submitted in support of the application.
3. You should also consider the possible impact of climate change, especially: • flood risk • drought • extreme temperatures • other extreme weather events Existing sites must consider the risk of climate change on their existing facilities and as far as possible have contingency measures in place.	Climate Change Adaption Risk Assessment covering site operations and implemented as part of the EMS considers the potential impacts of Climate Change.
4.2 Site Design	
1. The storage and handling of waste on site must be located as far as technically and economically possible from any sensitive receptors.	The storage and handling of waste on site is located as far as technically and economically possible from any sensitive receptors and screened by existing site infrastructure.

Biowaste Appropriate Measure	Site Assessment v Appropriate Listed Measure
2. When designing your biological treatment site you must consider minimising the unnecessary handling of waste between each step in the process, from receipt, during treatment, and during storage of the final material.	N / A – no treatment on site.
3. All biological treatment facilities must be designed by a suitably qualified or experienced person. Facilities must be built to recognised industry standards.	N / A – no treatment on site.
4. You must design your plant to minimise emissions during the transfer of waste from one step to another. For example, the transfer of feedstock from reception to a feed hopper. You must consider at the design stage where there is an opportunity to cover storage areas and where possible contain, treat and abate air using appropriately engineered plant.	Only transfer on site is to / from delivery vehicles to storage tanks / skips from vehicles to ground level. Storage tanks fitted with carbon filters to abate displaced gases. No feasible emissions from skip operation.
5. To prevent emissions (including ammonia) you must cover digestate stores and compost liquor. Where fixed covers are used these must have a system that can remove and effectively treat emissions.	Storage tanks are covered. Displaced gases from tanks with fixed covers are abated via carbon filters.
6. You must consider the location of access doors in relation to sensitive receptors to prevent loss of containment. Reducing or preventing contamination	N / A – all operations external.
7. Good site design and process flow reduces the risk of cross-contamination of pasteurised or sanitised and stabilised materials.	Site designed to prevent cross contamination of wastes / materials.
8. You must consider the design, process flow and intended use of outputs during the planning and design stage of your plant to prevent cross contamination of treated and untreated material. Preventing cross contamination by segregation relies on both the: • physical separation of waste • procedures that identify when and where wastes are stored	Wastes stored separately and procedures in place to prevent cross contamination during delivery and removal of materials from storage.
9. When designing new plant, you must make sure that you assess the environmental impacts from the plant's operating life and eventual decommissioning.	Any new plant installed on site will be assessed for its Environmental Impacts during operational life and decommissioning.
10. All critical structures should be designed and built to construction and design regulation.	Stores constructed to CIRIA 759.
11. All secondary containment must meet the requirements of the Construction Industry Research and Information Association (CIRIA) report C736 or an equivalent standard.	Secondary containment meets C736.
12. A chartered civil or structural engineer must provide construction quality assurance (CQA) and validate the construction of all facilities. You can use a chartered geotechnical or structural engineer for lagoon design and construction. All pipe work must be designed to allow for inspection or integrity checks, or both.	No lagoons constructed on site, stores constructed to CIRIA 759.
13. Drainage and vessels must be accessible to allow cleaning and maintenance.	Only drainage infrastructure on site is a sealed sump, located in secondary containment area, which will be accessible to allow cleaning, maintenance and inspection.
14. You must design underground tanks to allow inspection and must have secondary containment with leakage detection.	N / A – no underground tanks used for waste treatment.
15. You must consider the life of all plant and its decommissioning at the design stage. This includes tanks, pipework and drainage and lagoon structures.	All plant installed has been assessed for its Environmental Impacts during operational life and decommissioning. The Environmental Risk Assessment submitted in support of the

Biowaste Appropriate Measure	Site Assessment v Appropriate Listed Measure
	application has demonstrated environmental impact of site activities to be insignificant.
4.3 Site capacity	
1. You must determine the actual physical capacity needed to manage, treat and store waste on your site without causing pollution.	Capacity has been calculated. Waste Acceptance Procedures in place will ensure site do not breach capacity.
2. You must include factors like seasonal changes in feedstock supplies and in markets for outputs. Exceeding the site capacity will significantly increase the risks of pollution. This includes the capacity of storm tanks.	N / A – Site is not a treatment operation / accept feedstocks.
3. You must provide enough space on site to operate your plant and equipment safely, and to allow easy and environmentally safe storage and treatment.	There is enough space on site to operate plant and equipment safely and in an environmentally sound manner.
4. Environmental permits set limits on the amount of waste you can: • bring onto site on an annual basis • treat at any one time • store at any one time To determine the daily and annual throughput, you must establish the following critical volumes or tonnes: • waste storage capacity at any one time for both incoming waste and processed material • residence time for waste to be fully treated and recycled	Waste storage capacities have been determined and will be complied with.
5. General management appropriate measures	
1. The following measures apply to all processes and operations. You must have an up to date, written management system. The level of detail you need will be related to the size of your operation, site location and complexity. Your management system must aim to improve the overall environmental performance of the site.	A robust EMS will be in place, relevant to the scale of the operation.
2. You must have management commitment, including from senior managers (where applicable) to develop an environmental policy that is defined by senior managers (where applicable). This policy must include the continuous improvement of the facility's environmental performance, so you can identify pollution risks and minimise them through appropriate measures and make best and most efficient use of resources. Your management system must also incorporate the features that follow.	The EMS includes top level commitment from Company Directors, including a suitable Environmental Policy.
3. You plan and establish the resources, procedures, objectives and targets needed for environmental performance alongside your financial planning and investment.	Directors are committed to providing the necessary level of resources to ensure ongoing environmental compliance.
4. You implement your environmental performance procedures, paying particular attention to: • staff structure and relevant responsibilities • staff recruitment, training, awareness and competence • communication (for example, of performance measures and targets) • employee involvement • documentation • effective process control • maintenance programmes	Environmental Procedures are implemented on site which address the items listed.

Biowaste Appropriate Measure	Site Assessment v Appropriate Listed Measure
• emergency preparedness and response • making sure you comply with environmental legislation	
5. You check environmental performance and take corrective or preventative action (or both), paying particular attention to: • monitoring and measurement • investigating and learning from incidents, near misses and mistakes including those of other organisations • records maintenance • independent (where practicable) internal or external auditing of the management system to confirm it has been properly implemented and maintained	The EMS contains mechanisms to monitor and review environmental performance. The Incident and Corrective Action Reporting structure within the EMS allows for environmental issues to be investigated and appropriate corrective actions implemented.
6. Senior managers and or operators must periodically review the management system to check it is still suitable, adequate and effective.	The EMS is reviewed by Site Management / TCM on an annual basis as a minimum.
7. You review the development of cleaner technologies and their applicability to site operations. The Environment Agency would expect you to consider cleaner technologies: • as a result of substantiated pollution incidents • when reviewing management systems • when planning investment decisions, for example new items of plant	Cleaner technologies would be considered as appropriate as part of the EMS review.
8. When designing new plant, you must assess the environmental impacts from the plant's operating life and eventual decommissioning. You must make sure that new plant is authorised by your environmental permit.	A Permit Variation would be applied for if changes were required to be made to the Environmental Permit.
9. You must have a written procedure for proposing, considering and approving changes to procedures or infrastructure related to storing or treating waste or pollution control. This is so you can track and control the process of change.	A New Projects Procedure is implemented within the EMS to ensure changes to site operations are suitably assessed.
10. You consider the risks a changing climate presents to your operations and have appropriate contingency plans in place to assess and manage future risks.	A Climate Change Adaption Risk assessment is implemented as part of the site's EMS.
11. You compare your facility's performance against relevant sector guidance and standards on a regular basis, known as 'sectoral benchmarking'.	N / A – Given this is such a simple operation, there are no relevant benchmarks
12. You document and implement appropriate waste stream management.	Records and procedures produced as part of the EMS ensure site document and implement appropriate waste stream management.
13. You have and maintain a site condition report for installations. For waste facilities the Environment Agency recommends that you carry out a site condition assessment during the life of the site. You would need to carry out this assessment on surrender. Please read the guidance Environmental permitting: H5 site condition report.	Site Condition Report maintained in line with H5 Guidance.
14. You have and maintain: • an inventory of waste water, waste gas streams or fugitive emissions • a product and residues management plan • an accident management plan • a site infrastructure plan	Relevant items listed will be maintained within the EMS, including Odour Management Plan, Environmental Accident Management Plan and Infrastructure Monitoring Program.

Biowaste Appropriate Measure	Site Assessment v Appropriate Listed Measure
• an odour management plan • a bioaerosol risk assessment and management plan • a fire prevention plan, if required • a noise and vibration management plan, if required • a pest management plan, if required • a dust, mud and litter management plan (emissions management plan) if required • a leak detection and repair plan, if required By 'inventory' we mean a complete and detailed list of all waste water and waste gases produced, handled and treated by your process or plant. Where possible, for example from channelled emissions points (point-sources), your inventory must quantify characteristics such as: • substance concentration • load value and variability of each waste water and waste gas stream	
5.2 Inspection, maintenance and monitoring	
The following measures apply to all processes and operations. 1. You must have a schedule of inspection, maintenance and monitoring programmes for all plant and equipment (including the impermeable surfacing and drainage systems).	Infrastructure Monitoring Program and Planned Preventative Maintenance Regimes implemented as part of the EMS outlining inspection and maintenance regimes.
2. You must inspect, maintain and monitor plant, equipment and infrastructure in accordance with manufacturer or design guidelines.	Plant, equipment and infrastructure will be inspected, maintained and monitored in accordance with manufacturer or design guidelines.
3. Where manufacturers' guidelines are not available, or where you have modified them, you must provide evidence that there are sound reasons for not following these guidelines, and that you have a robust alternative.	Appropriate justification will be documented where manufactures guidelines cannot be followed.
4. You must be able to produce proof of all inspection and maintenance through records of maintenance and inspection when requested.	All inspection and maintenance records will be available on request.
5. If the site is more complex (AD, IVC and MBT plants) you must do a Hazard and Operability Study (HAZOP) or a similar study or risk assessment	N / A – This is a simple storage and transfer operation.
6. You must consider stocking or holding a list of critical spare parts and chemicals. You must be able to procure and install spares without undue delay.	Planned Preventative Maintenance Regime will document any critical spares held on site.
7. You must have a programme of review and consider design improvements which take into account future de-commissioning (for existing plants). These improvements may include: • improving or replacing underground tanks and pipework – or proposing an inspection regime • installing secondary containment or instigating a suitable monitoring programme depending on the risks identified and the sensitivity of the potential receptors • inspecting, draining and cleaning out vessels and pipework (especially before decommission and before dismantling) • inspecting and reviewing lagoons to make sure there is no leakage or damage – you must consider the life of the facility and any future decommissioning and clean up	Inspections undertaken as part of the Infrastructure Monitoring Program will highlight where design improvements can be made.

Biowaste Appropriate Measure	Site Assessment v Appropriate Listed Measure
• reviewing insulation – this should be easy to dismantle without producing dust or causing a hazard to staff and local receptors • using recyclable materials, taking into account operational or other environmental objectives	
5.3 Staff Competence	
The following measures apply to all processes and operations. 1. Your site must always be operated or monitored (or both) by an adequate number of staff who have appropriate qualifications or training (or both) and competence.	Site will always be operated / monitored by an adequate number of staff who have appropriate qualifications or training (or both) and competence.
2. If you operate a 24-hour process, for example an in vessel or AD facility you must have: remote or telemetric systems in place to make sure an alarm would be raised in the event of an incident during unmanned hours appropriate personnel on call to deal with such incidents	N / A – Site is not a 24-hour operation.
3. You must adequately explain these procedures in your management system and make sure they are implemented.	N / A – Site is not a 24-hour operation.
4. The design, installation and maintenance of infrastructure, plant and equipment must be carried out by competent people, including using CQA where appropriate.	The design, installation and maintenance of infrastructure, plant and equipment is carried out by competent people.
5. You must have appropriately qualified managers for your waste activity who are members of a government-approved technical competence scheme.	Appropriate TCM in place.
5.4 Accident Management Plan	
The following measures apply to all processes and operations. 1. As part of your written management system you must have a plan for dealing with incidents or accidents that could result in pollution, including near misses.	EMS includes an Environmental Accident Management Plan (EAMP).
2. Your accident management plan must identify the hazards, risk and mitigation measures that will protect the environment in the event of an accident or event.	The EAMP identifies the hazards, risk and mitigation measures that will protect the environment in the event of an accident or event.
3. Particular areas to consider may include: • waste types and reactions of mixed waste • transferring substances, for example filling (including overfilling) or emptying of vessels and containers, over pressure of vessels and pipework, blocked drains • preventing incompatible substances coming into contact with each other • failure of plant and equipment, for example storage tanks and pipework, or blocked drains • failure of containment, for example bund failure or drainage sumps overfilling • making the wrong connections in drains or other systems • failure to contain firefighting water • failure of abatement systems • hazardous atmospheres in confined spaces • failure of main services, for example power, steam or cooling water • checking the composition of effluents before their emission • vandalism and arson	The EAMP gives consideration to all relevant items.

Biowaste Appropriate Measure	Site Assessment v Appropriate Listed Measure
• operator error • accessibility of control equipment in emergency situations • extreme weather conditions, for example flooding or very high winds • having a contingency arrangement to divert waste feedstock when your ability to spread outputs to land, or inject gas to grid, is limited	
4. You must assess the risk of accidents and their possible consequences. To help you do this you can either use: the Environment Agency's risk assessment guidance a HAZOP or a similar detailed assessment that identifies hazards through possible deviations from the design intention	Risk of accidents has been assessed as part of the Environmental Risk Assessment submitted in support of the Permit application, which gives due consideration to the EA's risk assessment guidance.
5. Risk is the combination of the likelihood that a hazard will occur and the severity of the impact resulting from that hazard. Having identified the hazards, you can assess the risks by addressing 6 questions: • how likely is it that the accident will happen? • what may be emitted and how much? • where will the emission go – what are the pathways and receptors? • what are the consequences? • what is the overall significance of the risk? • what can you do to prevent or reduce the risk?	Risk assessment completed following EA guidance.
6. The depth and type of accident risk assessment you carry out will depend on the complexity of your facility and its location. The main factors to take into account are the: scale and nature of the accident hazard presented by the facility and its activities risks to areas of population and the environment (the receptors)	The EAMP is appropriate to the risk and complexity of site activities.
7. Through your accident management plan, you must also identify the roles and responsibilities of the staff involved in managing accidents. You must provide them with clear guidance on how to manage each accident scenario, for example as a result of a spillage of a potentially polluting liquid.	Roles and responsibilities are identified with the EAMP.
8. You must have a suitably trained facility employee available at all times who will act as an emergency co-ordinator and will take responsibility for implementing the accident management plan.	Emergency co-ordinator will be trained and available in the event of an environmental accident.
9. You must train your employees so they can perform their duties effectively and safely and know how to respond to an emergency.	Employees are trained so they can perform their duties effectively and safely and know how to respond to an emergency.
10. You must also: • establish how you will communicate with relevant authorities, emergency services and neighbours (as appropriate) before, during and after an accident implement emergency procedures, including for safe plant shutdown and site evacuation • implement post-accident procedures that include doing an assessment of the harm an accident caused (or may have caused) and actions you will take to prevent further accidents • consider the impact of accidents on the function and integrity of plant and equipment • have contingency plans to relocate or remove waste from the facility and suspend incoming waste	The EAMP details communication methods, accident review and contingency arrangements and testing mechanisms.

Biowaste Appropriate Measure	Site Assessment v Appropriate Listed Measure
• test the accident management plan by carrying out emergency drills and exercises	
11. Following a flooding event you must inspect and assess the integrity of affected plant and equipment, in particular infrastructure that may have been in contact with floodwater or groundwater. Tank inspections should include non-destructive testing methods to verify their integrity.	N / A – Site not at risk of flooding as set out in the Environmental Risk Assessment.
12. Storage and drainage lagoons must have adequate storage capacity to make sure structural integrity is not compromised during extreme weather events.	N / A – No lagoons on site.
5.5 Preventing Accidental Emissions	
The following measures apply to all processes and operations. 1. You must have a drainage plan and in the event of an emergency this must be available to emergency services. The drainage plan should clearly identify clean and dirty or foul drainage.	N / A – No relevant site drainage infrastructure.
2. You must make sure that in an emergency you can contain on site: • process waters • contaminated site drainage waters • emergency firefighting water • chemically contaminated waters • spillages of chemicals	Relevant materials listed would be contained on site in the event of an emergency as all activities undertaken within suitability constructed secondary containment.
3. You must put spill contingency procedures in place to minimise the risk of an accidental emission of raw materials, products, and waste materials, and to prevent their entry into water, land and air.	Spill Control Procedure implemented as part of the EMS.
4. Your drainage and collection system must take account of additional firefighting water flows or firefighting foams. You may need emergency storage to prevent contaminated firefighting water reaching a receiving water body.	FPP addresses how firewater is managed on site.
5. You must consider and reduce the risk of accidental emissions from: • loss of containment – all polluting matter vents • safety relief valves – making sure these are checked and maintained (preventing sticking and over feeding, see site capacity in section 4) bursting discs and seals • tank wall penetrations • storage containers	Relevant items listed have been addressed in the EAMP / Environmental Risk Assessment.
6. Liquids or fire water held in the buffer storage must be removed from site.	N / A – No buffer storage.
5.6 Security Measures	
The following measures apply to all processes and operations. 1. You must have security measures in place (including staff) to prevent: • entry by vandals and intruders • damage to the equipment • theft • fly-tipping • arson	Security measures are in place to prevent entry by vandals and intruders, damage to the equipment, theft, fly-tipping and arson.
2. Facilities must use one or a combination of the following measures: • security guards • total enclosure (usually with fences)	Site has controlled entry points, adequate lighting, warning signs and 24 hour surveillance through CCTV.

Biowaste Appropriate Measure	Site Assessment v Appropriate Listed Measure
• controlled entry points • adequate lighting • warning signs • 24 hour surveillance such as CCTV	
5.7 Fire and Explosion Prevention	
The following measures apply to all processes and operations. 1. You must have a fire prevention plan that meets the requirements of the Environment Agency's fire prevention plan guidance. The plan should include: preventing the uncontrolled decomposition and self-heating of stored waste by managing and monitoring temperature and moisture implementing written systems to prevent unsafe situations during site operations, repair and maintenance having a 'permit to work' system in place for maintenance and repairs, such as hot work on plant and equipment, and where the risk of unsafe conditions could occur having appropriate systems in place for fire and explosion prevention, detection and suppression or extinction – you must document these measures in your accident management plan or fire prevention plan, if required, to comply with your permit conditions	FPP completed in line with EA guidance.
2. You must prevent the build-up of loose combustible material (including dust and waste) particularly around treatment plant, equipment and other potential sources of ignition.	Simple storage and transfer operation with minimal potential for build up of loose combustible material.
3. You must: make sure that all the measurement and control devices you would need in an emergency are easy to access and operate in an emergency situation maintain plant in a good state through a preventive maintenance programme and a control and testing programme use techniques such as suitable barriers to prevent moving vehicles damaging equipment put procedures in place to avoid incidents due to poor communication between operating staff – during shift changes, periods of cover by temporary staff and following maintenance or other engineering work where relevant, use equipment and protective systems designed for use in potentially explosive atmospheres	N / A – simple storage and transfer operation. No relevant measurement or control devices on site.
4. You must be mindful of alarm fatigue and make sure all alarms are appropriately set and promptly responded to.	N / A – no alarms on site.
5. You must make sure that critical safety equipment, for example sprinklers, pressure relief valves and flares are maintained and kept in good working order.	N / A – no fire detection / suppression equipment on site.
6. Workers on site must be protected and monitored in line with the Health and Safety Executive (HSE) guidelines and regulations.	Health and Safety Regulations complied with.
7. You must carry out all assessments in line with your facility's occupational exposure process and health and safety guidelines.	Health and Safety Regulations complied with.
5.8 Firefighting	
The following measures apply to all processes and operations.	FPP sets out how fires would be extinguished.

Biowaste Appropriate Measure	Site Assessment v Appropriate Listed Measure
1. Your accident plan must clearly state what actions are taken to extinguish fires on site and operators must be trained in these procedures.	
2. Your facility must have access to water supplies to extinguish fires. In remote locations where water supplies are not available you must seek advice from your local fire service.	FPP sets out that appropriate water supplies are in place for firefighting.
3. In the event of a fire on site, your accident plan must consider how you will prevent firefighting run-off leaving site. Where possible you should have the capability to collect, contain and store firefighting water run-off.	FPP sets out the fire fighting strategy to minimise the potential for firewater and any associated run off.
4. You must isolate drainage systems from flammable waste storage areas to prevent fire spreading along the drainage system by solvents or other flammable hydrocarbons.	N / A – no applicable drainage infrastructure on site.
5.9 Record keeping and procedures	
The following measures apply to all processes and operations. 1. You must: keep an up to date record of all accidents, incidents, near misses, changes to procedures, abnormal events, and the findings of maintenance inspections carry out investigations into accidents, incidents, near misses and abnormal events and record the steps taken to prevent their reoccurrence maintain an inventory of substances, which are present (or likely to be) and which could have environmental consequences if they escape record and hold a critical plant and equipment asset register, including a register of equipment installed in explosive atmospheres (ATEX-rated equipment)	The EMS will ensure all necessary records are maintained and available for inspection.
2. You must notify the Environment Agency without delay if you detect any of the following events and they are causing, or may cause, significant pollution: a malfunction a breakdown or failure an accident an emission of a substance not controlled by an emissions limit a breach of an emissions limit	EMS includes an EA Notification Form to ensure EA are notified in line with Permit requirements.
5.10 Contingency plans and procedures	
The following measures apply to all processes and operations. 1. You must have and implement a contingency plan which makes sure that you: • comply with all your permit rules and operating procedures during maintenance or shutdown, or critical failure at your site or elsewhere • do not exceed limits in your permit and you continue to apply appropriate measures for waste storage, handling and treatment • stop accepting waste unless you have a clearly defined method of recovery or disposal, and enough permitted storage capacity when land bank availability is limited, for example, during exceptional weather events such as prolonged rain or snowfall, deep frosts and severe drought • plan for any restrictions that will affect the spreading of digestate or compost to land, for example, nitrate vulnerable zones (NVZ) closed periods	The EMS contains contingency arrangements to ensure compliance with the Permit in the event of abnormal operations.
2. You must have the following information in your contingency plan:	Contingency procedures implemented as part of the EMS.

Biowaste Appropriate Measure	Site Assessment v Appropriate Listed Measure
• a description of each waste and material and the correct LoW code for each waste (inputs and outputs) • details of permitted waste facilities that could accept and manage your waste if site holding capacity will be exceeded – you must obtain a copy of the site permit to make sure it can accept your waste type • the capacity (volume) of all contingency options and the length of time for which it would be available or needed • potential environmental and health and safety risks and hazards of all contingency options (for example, odour and emission generation, or leachate production from longer-term storage) • any legal restrictions or constraints for each contingency option	Waste would not be accepted on site when it is at capacity. Any materials destined to site would be delivered to other suitably licensed facilities and details of these would be held on file.
3. You must identify your contingency options for use over the short term (1 to 2 weeks), medium term (4 to 6 weeks) and the long term (up to 6 months).	Contingency procedures will cover short, medium and long-term timescales.
4. Your management procedures and contingency plan must also: identify known or predictable malfunctions associated with your technology and the procedures, spare parts, tools and expertise needed to deal with them make sure you have the spare parts, tools, and competent staff needed before you start maintenance record where you can get critical spare parts from and how long it would take to obtain them if you cannot hold them on site have a defined procedure to identify, review and prioritise items of plant which need a preventative regime include all equipment or plant whose failure could directly or indirectly lead to an impact on the environment or human health identify non productive or redundant items such as tanks, pipework, retaining walls, bunds, reusable waste containers, ducts, filters and security systems	EMS procedures will cover the items listed where applicable to our simple storage and transfer operation
5. You must make your feedstock suppliers and customers aware of your contingency plan, and of the circumstances in which you would stop accepting waste from them.	Customers will be informed where waste materials cannot be accepted on to site.
6. You must consider whether the sites or companies you rely on in your contingency plan: can take the waste at short notice are authorised to do so in the quantities and types likely to be needed in addition to carrying out their existing activities – if in doubt contact your local Environment Agency office for advice	Companies / sites referenced to in contingency procedures will be able and Permissible to support our operations.
7. You must not include unauthorised capacity in your contingency plan. If your contingency plan includes using temporary storage for additional waste on your site, then you must make sure your site is authorised for this storage and the appropriate infrastructure is in place.	Contingencies would not include any unauthorised capacity.
8. Your management system must include procedures for auditing your performance against all the contingency measures detailed above and for reporting the audit results to the site manager.	Contingency procedures will be reviewed on an annual basis as part of the EMS review.
9. If you produce an end of waste material at your facility, your contingency planning must consider storage capacity for end of waste products and materials that fail the end of waste specification.	N / A – site do not produce end of waste materials.
5.11 Plant commissioning, validation and decommissioning	
The following measures apply to all processes and operations. 1. The term commissioning means to bring an item of plant or equipment into working condition. You must notify the Environment Agency before you start commissioning. You must consider communicating with local communities during the commissioning phase, to comply with your management system and odour management plan.	Commissioning considered N / A. This is a simple storage and transfer operation. There is no treatment infrastructure that would require commissioning.

Biowaste Appropriate Measure	Site Assessment v Appropriate Listed Measure
2. You must consider the arrangements for commissioning your plant at the design stage. You must have a commissioning plan in place before you start commissioning to minimise the risks of pollution and harm to human health and the environment. The level of detail can be based on the complexity of, and risks associated with, the process.	N / A – See above.
3. You must define the suite of indices you will use to determine and monitor process performance and efficiency.	N / A – See above.
4. You must review and refine the relevant monitoring parameters during the facility's operation as part of an on-going process of system optimisation.	N / A – See above.
5. You must test and validate all systems and components of your plant and building(s) against operational requirements identified at the design stage. This must include, for example, the air extraction and abatement system and containment structures.	N / A – See above.
6. You must have completion certificates (for each commissioning phase) in place, signed by an appropriately qualified person.	N / A – See above.
7. Commissioning must be carried out to relevant industry standards where they are available, or follow manufacturers' guidelines. As a minimum, the commissioning plan must include summaries of: • commissioning phases (and sequences) including milestones and timeframes (for example pre, cold, hot commissioning) • procedures and mechanical tests at each phase including relevant industry test standard (or otherwise), for example manufacturers' guidelines Mechanical tests could include, for example: • tests for leaks • pressure tests of piping and equipment • purging or inerting requirements • pressure and vacuum safety relief where required • temperature • flow and pressure control • mixing • air flow ventilation • extraction	N / A – See above.
8. Your commissioning plan must also include the: • scope of performance tests, for example, acceptance criteria, measurement requirements, sampling requirements, reference to analytical procedures, chemical and biological analysis • identification of potential releases to the environment of displaced and generated emissions and measure to mitigate these, for example, lean burn flares • scope of responsibilities of the person(s) related to the test procedures, including the sign-off process • qualifications of the responsible person(s) involved	N / A – See above.

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• process for dealing with failed tests and problems that you may encounter • health and safety precautions and protective measures employed	
5.12 Decommissioning and mothballing	
The following measures apply to all processes and operations. 1. You must consider plant decommissioning or ceasing activities (mothballing) at the design stage.	No treatment on site. This is a simple storage and transfer operation. All waste would be removed from site before mothballing / decommissioning as set out in the Site Closure Plan within the EMS.
2. You must have plans that minimise risks during the time decommissioning or mothballing takes place. This includes removing or replacing individual items of plant throughout the life of the facility.	Site Closure Plan ensures all environmental controls remain in place while the site is decommissioned.
3. Before you decommission plant you must notify the Environment Agency and provide a copy of your decommissioning plan.	The EA would be notified, and a decommissioning plan provide to them.
4. Once decommissioning is complete you must provide a written report to the Environment Agency verifying that you have carried out activities in line with your plan.	EA would be notified once decommissioning is complete.
5. If you bring plant back into service after a period of dormancy you must follow the commissioning requirements set out in this document or be directed by a suitably qualified person.	Plant would only be brought back in line once assessed by a suitably qualified engineer.
6. You must have a decommissioning plan to demonstrate that: plant can be decommissioned without causing pollution the site will be returned to a satisfactory condition, for example in line with your site condition report	Site Closure Plan within the EMS details these elements.
7. The decommissioning plan must include details of (but not limited to): • removing or flushing out pipelines and vessels where appropriate and completely emptying any potentially harmful contents • drawings showing all the underground pipes and vessels • the method and resources needed for clearing lagoons • how you will dismantle buildings and other structures in a way that protects surface water and groundwater at construction and demolition sites • the soil testing needed to understand the degree of any pollution caused by the site activities, and information on what remediation is needed to return the site to a satisfactory state as defined by the initial site report • the measures proposed, once activities have ceased, to avoid any pollution risk and to return the site to a satisfactory state (including, where appropriate, those covering the design and construction of the plant) • how you will clear any residues, waste, and any contamination resulting from the waste treatment activities	Site Closure Plan within the EMS details these elements where applicable.
6. Waste pre-acceptance, acceptance and tracking	
The following measures apply to all processes and operations. 1. Wastes accepted at sites must be capable of biological treatment and be fully recovered and suitable for their intended end use.	N / A Site is not a treatment facility. Nevertheless, wastes will only be accepted on site if downstream recovery outlets are available for them.
2. A waste is only suitable for biological treatment if your treatment process is designed to:	N / A – Site is not a treatment operation.

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treat the types of wastes included on your environmental permit manage variability in feedstock and optimise process conditions make sure there is sufficient capacity to treat waste within the retention time of the process	
3. You must implement waste pre-acceptance and acceptance procedures for all new waste streams so that you know enough about a waste (including its composition, characteristics and predicted age) before it arrives at your facility. You need to do this to assess and confirm the waste is technically and legally suitable for your facility.	Waste pre-acceptance and acceptance procedures implemented as part of the EMS.
4. You must document you waste pre-acceptance and acceptance procedures in your management system.	Waste pre-acceptance and acceptance procedures are documented within the EMS.
5. You must assess waste on initial acceptance and periodically to ensure constancy.	Waste acceptance procedures will be constantly under review to ensure wastes accepted are in compliance with the Permit.
6. You must obtain representative test data and undertake upstream auditing of the production process to fully characterise the waste and identify the substances it contains.	Relevant details will be obtained from waste producers to fully characterise wastes. This information will be recorded on site pre-acceptance records.
7. You must not include wastes in the process solely for dilution.	N / A – no treatment of waste on site / use of wastes for dilution purposes.
8. You must have a system in place to track waste from receipt, handling on site and transfer off site.	Bespoke App and Records made by the EMS will ensure wastes are traced from receipt to transfer off site.
9. You cannot accept waste containing animal by-products unless your facility has been validated following the regulations and approved by the Animal and Plant Health Agency (APHA). You must monitor your process in line with animal by-products regulations where required to do so.	Site already has approval from APHA to store and transfer ABP.
6.1 Waste pre-acceptance and characterisation	
1. You must use WM3 technical guidance on waste classification to be able to assign the correct waste classification code.	It is the waste producer's responsibility to classify wastes. WM3 guidance will be used to ensure the correct EWC code is used.
2. When you receive a customer enquiry and before the waste arrives at the facility, you must obtain the following in writing or in an electronic form: • details of the waste producer including their organisation name, address and contact details • the source and nature of the waste, at the point of production (the process that gives rise to the waste) • a description of the waste including its physical form • the full characteristics of the waste including the variability of each waste (for example, liquid effluents must be individually assessed and tested, understanding of the waste's composition and characterisation must be based on representative samples) • a description of any hazardous properties including potential risks to process safety, occupational safety and the environment • the odour potential • the type of packaging and risks of contamination • an estimate of the quantity you expect to receive in each load and in a year • the potential for self-heating, self-reactivity or reactivity to moisture or air the age of the waste	The information listed will be obtained as part of our pre-acceptance checks.

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3. During pre-acceptance you must consider how you will manage and control the nutrient balance of the waste feedstock, the moisture and any toxic compounds which may inhibit biological activity.	N / A this is not a waste treatment operation or looking to control nutrient balance of feed stocks.
4. You must verify the pre-acceptance information by contacting or visiting the producer. Dealing with staff directly involved in waste production can help to fully characterise a waste.	Pre-acceptance checks will be verified by contacting the waste producer directly.
5. You must keep pre-acceptance records for at least 3 years (in a computerised waste tracking system) following receipt of the waste. If an enquiry does not lead to receipt of the waste, you do not need to keep records.	Pre-acceptance records will be kept as part of the waste tracking system for three years.
6. You must reassess the information you had at pre-acceptance yearly. You must also reassess information required at pre-acceptance if the: waste changes process giving rise to the waste changes waste received does not to conform to the pre-acceptance information Before you accept waste you must consider its potential odour and emissions impact (description and intensity), for example: mercaptans, ammonia or other volatile organic compounds (VOCs) low molecular weight amines, for example, decaying fish or meat other high-nitrogen and odorous materials or chemicals, for example from highly decomposed food waste or poultry manure You can only accept odorous wastes using special handling and storage arrangements such as in adequately covered or air contained and abated areas.	Pre-acceptance information will be reviewed on an annual basis and if the waste changes / process giving rise to the waste changes / waste received does not conform with pre-acceptance checks. The OMP implemented on site ensures the odour risks of wastes are adequately assessed.
7. You must keep separate the roles and responsibilities of sales staff and technical staff. If sales staff are involved in waste enquiries then technical staff must carry out a final assessment before approval.	Roles of sales and technical staff are kept separate. Technical staff will carry out final waste acceptance checks.
8. . You must use this final technical check to make sure that you: only accept wastes that are suitable and permitted for the site avoid over accumulating waste have enough storage and treatment capacity When you agree that you will accept waste from a customer, you must decide and record what parameters you will check at the acceptance stage. The checks could be visual (for example colour, phase, fuming), physical (for example pumpability, temperature, form) and chemical (for example pH, metals content) parameters.	Final technical checks will ensure wastes are permissible / site has capacity will be undertaken by technically staff.
9. You must also record the criteria for non-conformance or rejection.	Criteria for non-conformance or rejection forms part of our waste acceptance procedures within the EMS.
10. You must make sure that your facility can comply with other regulatory requirements, for example the Animal By-Products Regulations.	Site will comply with all necessary Regulations.
11. You must advise your customers that they must avoid contaminating waste because it can cause handling difficulties and inhibit the biological treatment process. You must tell them what wastes are likely to contaminate your process.	Customers will be advised at the pre-acceptance stage to avoid contaminating wastes to be delivered to site.
12. You must not transfer waste unnecessarily between waste facilities.	Wastes will not be transferred unnecessarily between waste facilities.
13. You must obtain a representative sample or analysis, or analyse a representative sample of a waste, if:	Wastes will be sampled as required.

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the chemical composition or variability of the waste is unclear from the information supplied by the customer there are doubts about whether the sample analysed is representative of the waste you will treat the waste at your facility (this will allow you to carry out tests to determine if the planned treatment will be safe and effective) Where you rely on a customer sample you must record that you have done this and the reason why the customer sample is acceptable. If the customer has a number of containers holding the same waste, you can apply the industry standard applying the square root of (N)+1 rule to sampling those containers. For example: N = 28 containers +1 = √28 = 5.29 You would need to take 5 samples. If the waste is variable, you must take a sample from each container. You may not need a sample analysis at the pre-acceptance stage where the waste is: packaged food waste from food manufacturers or food retailers – however, you must have confirmation of its origin and enough information to understand how it will affect your biological treatment process biodegradable agricultural waste direct from the agricultural premises – however, you must have confirmation of its origin and enough information to understand how it will affect your biological treatment process green waste food waste and co-mingled green and food waste from local authority collections only a pure product chemical or where the chemical composition and hazardous properties are available in a REACH compliant safety data sheet, for example manufactured glycerol product	
14. You must make sure that feedstock testing and testing frequency reflects the nature of the material, how it arises and any potential variation within it. For example, taking account of seasonal variations. After fully characterising a waste, you must technically assess the waste's suitability for treatment and storage to make sure you can meet your permit conditions and any other regulatory requirements. You must make sure that the waste complies with the site's treatment capabilities and capacities. Waste types for standard rules permits The wastes listed on the biowaste treatment standard rules permits have already been characterised and risk assessed. The Environment Agency considers that they are generically suitable for the biological treatment process allowed by the permit. You must make sure that all the waste types you received match and comply with those wastes listed and described in the standard rules permits.	N / A – waste is not delivered to us as a feedstock. We are a storage and transfer operation. List of waste included with the Permit application for liquid wastes is consistent with AD plants we deliver feedstocks to.
6.2 Bespoke wastes	N / A no bespoke wastes to be accepted.
6.3 Waste Acceptance and Reception	

Biowaste Appropriate Measure	Site Assessment v Appropriate Listed Measure
The following measures apply to all processes and operations. 1.You must implement waste acceptance procedures to check the characteristics of the waste received matches the information you obtained during waste pre-acceptance. This is to confirm the waste is as expected and you can accept it, or that you must reject it. Your procedures must follow a risk based approach, considering: the source and nature of the waste the variability of a waste (for example, liquid effluents) – you must carry out individual assessment and testing any hazardous properties the waste may have potential risks, process safety, occupational safety and the environment (for example from odour and other emissions) knowledge about the previous waste holder(s) and the age of the waste the waste's potential for self-heating, self-reactivity or reactivity to moisture or air	Waste acceptance procedures are implemented as part of the EMS to check the characteristics of the waste received matches the information obtained during waste pre-acceptance assessments.
2. You must identify the effects of any seasonal variance on the waste's composition.	Any seasonal variance of the waste's composition would be identified.
3. You must only receive bespoke waste onto site that you have pre booked and that matches the pre-acceptance information. If you need to take samples on site, they must be representative of the waste and taken by a technically competent person. This means they must be appropriately trained or hold the relevant qualifications.	N / A no bespoke wastes to be accepted.
4. You must visually check wastes and verify them against pre-acceptance information and transfer documentation before you accept them on site. The extent of the initial visual check is determined by the waste type and how it is packaged.	Wastes will be visually checked against pre-acceptance and transfer information.
5. You must check and validate all transfer documentation and resolve discrepancies before you accept the waste. If you believe the incoming waste classification and description is incorrect or incomplete, you must address this with the original waste producer during waste acceptance.	Waste transfer documentation will be checked and validated, and issues resolved prior to accepting wastes.
6. You must record any non-conformances. If you have assessed the waste as acceptable for storage or treatment at your facility, you must document this.	Non-conformances will be recorded as part of sites Incident and Corrective Action Reporting mechanisms.
7. You must have clear criteria that you use to identify non-conforming wastes and wastes to be rejected.	Clear criteria are used as part of the EMS to identify non-conforming wastes and that non-conforming wastes are to be rejected.
8. You must also have written procedures for recording, reporting and tracking non-conforming and rejected wastes. These must include: using quarantine storage notifying the relevant customer or waste producer recording a summary of your justification for accepting non-conforming waste in your electronic (or equivalent) system	Non-conformance procedures will ensure the details listed are recorded.

Biowaste Appropriate Measure	Site Assessment v Appropriate Listed Measure
9. You must take measures to prevent the recurrence of non-conforming and rejected wastes.	A robust EMS will be implemented to ensure measures are taken to prevent the re-occurrence of non-conforming and rejected wastes.
10. You must weigh and record each load of waste on arrival to confirm the quantities against the accompanying paperwork, unless there are other reliable systems (for example, based upon density and volume). You must record the weight in a system that enables tracking. The person carrying out waste acceptance checks must be trained to effectively identify and manage any non-conformances in the loads received. After the initial visual inspection and confirmatory checks, you must offload the waste into a dedicated reception or storage area to wait for detailed checks or sampling. Wastes that do not require further checking can go into the appropriate storage area.	All wastes delivered to site will be weighed to confirm quantities. The person carrying out waste acceptance checks will be trained to effectively identify and manage any non-conformances in the loads received. Wastes will be unloaded ASAP following acceptance on site.
11. You must not offload wastes if you do not have enough space and capacity to treat the waste at that time.	Wastes will only be offloaded where there is capacity to do so.
12. Tankered wastes must not be discharged to the head of a waste water treatment works when storm tanks are in operation as this may result in the waste discharging directly into the watercourse. If you need to offload feedstock deliveries to inspect them, or carry out acceptance sampling before treatment, you must segregate the reception areas (typically into bays).	N / A.
13. You must verify the waste is compliant as soon as possible.	Wastes verified to be compliant as soon as possible
14. If you use a bay every day you must clean it at least weekly. You must clean it more often (depending on the waste) if weekly cleans do not deal with the risk of vermin or fugitive emissions.	N / A no waste storage bays used.
15. The waste reception area must be inside an enclosed building for the following: - if receiving, storing or pre-treating (for example, de-packaging food waste) as the waste may lead to fugitive emissions - for food waste - for all waste containing animal by-products A building is a covered structure, enclosed on all vertical sides, that is designed to provide sheltered cover and contain emissions of noise, particulate matter, odour and litter.	N / A – no waste reception areas. Biowaste discharged into storage tanks.
16. You must design enclosed buildings with an air extraction that is capable of negative pressure within the waste reception area and have air-lock controls. You must make sure the ventilation extraction and air treatment is suitably designed and engineered.	N / A – no buildings used as part of Permitted operations.
17. You must collect and treat all emissions in an appropriately engineered abatement system or air suction system close to the source. For in vessel systems, you can use exhaust air to aerate composting piles before treatment and discharge.	N / A – no buildings on site requiring ventilation
18. If you accept food and putrescible wastes, you must fit existing reception buildings with fast-acting roller shutter doors to allow delivery and other vehicles to enter and leave. You may need additional measures to minimise fugitive emissions, for example installing an airlock entry system.	N / A – No reception buildings on site.

Biowaste Appropriate Measure	Site Assessment v Appropriate Listed Measure
19. You must design and maintain buildings used for feedstock reception and storage in a way that minimises fugitive emissions. A reception building should have enough space to minimise the time waste is held before treatment, and to allow you to follow the first-in, first-out principle for waste treatment. You should operate an alternate bay system or single bay all-in, all-out approach. All bays used to segregate wastes must have defined and visibly clear storage demarcation boundaries. Where there is a likelihood you will generate bioaerosols and dust you must treat the air with a dust filter before releasing emissions. If you accept and store large volumes of ammonia-rich feedstock, for example poultry litter and manures, you must store it in a way that minimises the release of ammonia. You can do this by: covering it with a sheet or with an organic layer such as straw or compost to form a 'biofilter' using a 3-sided walled area You may need additional measures to reduce odour or ammonia if your site is located in sensitive areas.	N / A – No buildings used / feedstock reception processes on site.
20. You must design reception areas for easy cleaning and include contained drainage so you can collect wash-water separately for disposal or reuse.	N / A – No waste reception areas on site. Wastes unloaded into storage tanks. Skips placed on the ground. There should be no requirement for wash down under normal operations.
21. If you are permitted to accept animal by-products you must: - segregate these from other waste - keep liquors and leachate separate and provide wheel-wash facilities for disinfecting delivery vehicles on exit from the reception building - You may need additional cleaning methods, for example steam cleaning. You must carry this out in an enclosed area.	ABP stored separate from other materials. ABP delivered in enclosed tankers and no legal requirement for vehicle wash facilities.
22. You must characterise wash-down water containing cleaning chemicals, for example disinfectants, and dispose of them appropriately.	N / A – No wash down waters produced under normal operations.
23. For outside reception areas, you must have impermeable surfacing and a contained drainage system.	N / A – There are no external waste reception areas. Liquid wastes discharged into storage tanks are done so on an impermeable surface within a secondary containment system.
24. You must minimise the time you store putrescible waste in reception before treatment and hold it for no longer than 5 working days. You must treat waste promptly and within 24 hours if there is risk of: attracting vermin causing fugitive emissions such as odour	N / A – waste is not stored on site for treatment. Any environmental issues noted from wastes stored on site would be dealt with immediately ensuring offending waste removed from site within 24 hours of the issue being detected.

Biowaste Appropriate Measure	Site Assessment v Appropriate Listed Measure
You can store green waste and agricultural wastes for longer providing you follow all other appropriate measures to prevent uncontrolled decomposition and emissions. You may store stable waste material for longer periods as long as it does not degrade and is stored in a way that does not encourage vermin or result in fugitive emissions. Once offloaded, and as soon as is practicable to do so, you must assess the waste and verify it for acceptance, following your procedures.	
25. You must put non-conforming containers and wastes into quarantine and deal with them immediately. You must record all non-conformances.	Non-conforming containers and wastes would be put into quarantine and dealt with immediately. A record of this would be made following our Incident and Corrective Action reporting system.
26. Where pallets are used to hold containers, you must stack them no more than 1.8m high (including the height of the pallet) and secure them with clear or transparent shrink-wrap. The containers must not extend beyond (over-hang) the sides of the pallet. The shrink-wrap must be clear or transparent so that you can identify waste types, damaged containers, leaks or spillages and incorrectly stacked containers.	N / A – Pallets are not used to hold containers.
27. If you identify a non-conforming waste during a spot check, you must take measures to prevent a recurrence (including contacting the customer)	Non-conforming wastes identified during site checks would be dealt with appropriately and actions implemented to prevent a recurrence.
6.9 Waste tracking	
The following measures apply to all processes and operations. 1. You must use a waste tracking system which records information about the available capacity of the waste quarantine, reception, general and bulk storage areas of your facility. Your information must include treatment residues and end of waste product materials. Your tracking system must hold all the information produced during: - pre-acceptance - acceptance - non-conformance or rejection - storage - repackaging - treatment - removal off site - This information must be in a readily accessible format. Where possible this should be computerised.	Waste would be tracked using a bespoke App and EMS, which would detail the items listed as applicable. No waste repackaging or treatment on site.

Biowaste Appropriate Measure	Site Assessment v Appropriate Listed Measure
2. You must create records and update them to reflect deliveries, on site treatment and despatches. Your tracking system will operate as a waste inventory and stock control system. It must include this information as a minimum: - the date the waste arrived on site - the original producer's details - all previous holders - a unique reference number - the pre-acceptance and acceptance analysis results - the package type and size - the intended treatment or disposal route - the nature and quantity of wastes held on site - where the waste is physically located on site - where the waste is in the designated disposal route - staff (name and position) who have taken any decisions about accepting or rejecting waste streams and who have decided on recovery or disposal options - details that link each waste container accepted to its consignment or transfer note - non-conformances and rejections The tracking system must be able to report: - the total quantity of waste present on site at any one time and how that compares with the limits authorised by your permit - the total quantity of end of waste product materials on site at any one time - a breakdown of the waste quantities you are storing pending on-site treatment or waiting for onward transfer - a breakdown of the waste quantities by hazardous property - where a batch or load of waste is located based on the site plan - the length of time a waste has been on site	Bespoke app and records produced as part of the EMS will detail and report all information that is relevant to our basic storage and transfer operation.
3. You must store back up copies of computer records off site. Records must be easily accessed in an emergency.	Records maintained on a cloud system accessible in an emergency.
4. You must hold acceptance records for a minimum of 2 years after you have treated the waste or removed it off site. You may have to keep some records for longer if they are required for other purposes, for example hazardous waste consignment notes.	Duty of Care and acceptance records held for two years. No treatment of waste on site.
7. Waste storage, segregation, transfer and handling	
Appropriate measures for waste storage, segregation, transfer and handling. The following measures apply to all processes and operations. 1. Your facility must have enough physical and permitted capacity for the wastes, raw materials and 'end of waste' materials that you store on site.	Site will only accept wastes when there is available capacity to do so.
2. You must comply with the limits set in your environmental permit and with any additional regulatory requirements that may apply, for example, the:	Permitted activity already registered with APHA.

Biowaste Appropriate Measure	Site Assessment v Appropriate Listed Measure
- Animal By-Products (Enforcement) (England) Regulations 2013 - COMAH regulations	Given the basic nature and scale of operations, COMAH is N / A.
3. You must store all waste on an impermeable surface with contained drainage that meets the recommendations of CIRIA 736.	All waste activities undertaken on surfacing and within secondary containment meeting CIRIA 736.
4. Storage area drainage must: - contain all possible contaminated run off - prevent incompatible wastes coming into contact with each other - make sure that fire cannot spread - be designed to allow access for inspection and cleaning	Waste storage area meets requirements listed.
5. Where possible you must keep clean rainwater separate from wastes and waste waters to limit storage requirements.	Rain kept separate from wastes. No waste waters generated on site during normal operations.
6. You must store waste in locations that minimise handling waste and have handling procedures in place. Only competent staff must handle waste. They must use appropriate equipment.	Wastes stored in a way to minimise handling. Note, there is no manual handling of waste on site, this is a basic storage and transfer operation.
7. Where possible, you must locate storage areas away from watercourses and sensitive perimeters (for example those close to public rights of way, housing or schools).	Storage areas located away from sensitive receptors.
8. You must store all waste within the security protected area of your facility to prevent unauthorised access and vandalism.	Site is secure and measures in place to prevent unauthorised access including gated access, intruder alarm and CCTV.
9. Your management system and odour management plan must clearly state the maximum storage capacity of the site and the designated storage areas.	Management system states maximum storage capacity of site and storage areas.
10. You must provide signage that clearly states the maximum quantity and types of waste that can be stored in an area. You must communicate these maximum capacities to site operatives.	Signage will clearly state maximum quantity and types of wastes stored in an area. This will be communicated to operatives.
11. You must define capacity in clear terms, for example: - maximum tank or vessel capacities - -tonnage - number of pallets or containers	Capacity will be identified in clear terms, i.e tank capacity, number of skips.
12. You must regularly monitor the quantity of waste stored on the site and in designated areas to check you do not exceed the maximum storage capacities.	Capacity of wastes stored will be monitored and recorded to demonstrate compliance with the Permit.
13. For in vessel composting and AD, available storage capacity and throughput will be influenced by the period of time the waste is in the treatment vessels. You must make sure you have sufficient capacity to store waste inputs and outputs, taking account of the loading rate and capacity for treatment. Information on determining capacity is available in Regulatory Guidance Note 2.	N / A – composting and AD not undertaken on site.
14. You must store highly putrescible wastes, including odorous and ammonia-rich wastes and wastes containing animal by-products, in a contained or enclosed building. The building should be fitted with an appropriately engineered extraction and ventilation system, with the air extracted and directed to a suitable abatement system. You can install localised point source air extraction in buildings to minimise a source emission from that locality.	Liquid wastes stored in tank with displaced gas directed to appropriate abatement technology.

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For liquid wastes this is either: a sealed tank fitted with an air control system which may include air circulation. local extraction to a gas recovery plant or engineered abatement system.	
15. Your storage areas must be large enough to manage foreseeable changes in feedstock supply and your ability to despatch outputs without causing pollution. For example, during: public holidays periods of adverse weather seasonal peak volumes of waste acceptance	N / A – We only accept waste for storage and transfer. Wastes would only be delivered if we have sufficient capacity on site.
16. You must not over accumulate wastes. You must treat wastes or remove them from the site as soon as possible. You must prioritise the treatment or off-site transfer of waste based on: its type its age on arrival date of arrival duration of storage on site	No wastes treated on site. The minimal capacity of our operation ensures wastes cannot be over accumulated.
17. Storage area surfaces used for putrescible waste must be of a type and quality suitable for effective cleaning and or disinfection. You must put procedures in place and use them to make sure that surfaces are regularly cleaned or disinfected (or both).	N / A – putrescible waste is not tipped on site.
18. You must design your storage facilities and procedures to make sure there is no cross-contamination between inputs and outputs of the process, and during the treatment cycle (where applicable). For example, during the sanitisation and stabilisation of composting waste.	Procedures in place as part of the Environmental Management System, such as our Tanker Wash Out Schedule to minimise the potential for cross contamination of site / off site materials.
19. For waste in storage you must follow the first-in, first-out principle. You must also identify and prioritise dealing with wastes with a higher risk of causing odour, litter or pest problems. You can do this by filling and emptying bays alternately or operating an all-in, all-out approach.	Wastes will be stored in line with timescales set out in the OMP.
20. You must make your on-site waste inventory readily available.	N / A – all wastes accepted on site will be transferred for off-site recovery in line with duty of care requirements.
21. You site must have safe pedestrian and vehicular access (for example, for forklifts) (at all times) to storage areas so that you can retrieve waste safely.	Site has safe vehicle and pedestrian access to storage areas.
22. You must design bunkers, bays and pits so that waste and debris does not build-up in inaccessible areas such as corners. You must regularly clean bunkers, bays and pits.	N / A – No storage bunkers or bays on site.
7.1 Above ground tank and 'bulk' storage	
The following measures apply to all processes and operations. 1. You must locate all above ground tanks used for storing and treating waste on an impermeable surface with secondary containment.	All stores are constructed inline with CIRIA 759 and provided with secondary containment in line with CIRIA 736.
2. You must have a drainage plan.	Only drainage infrastructure on site is a sump within the secondary containment which is marked on a Site Layout Plan.

Biowaste Appropriate Measure	Site Assessment v Appropriate Listed Measure
3. You must use tanks and associated equipment that are suitably designed, constructed and maintained.	Storage Tanks will be suitably designed, constructed and maintained.
4 You must do a risk assessment to validate the design and operation of bulk storage systems.	Environmental Risk Assessment submitted with the Permit application demonstrates the infrastructure is suitable.
5. You must make sure any new tanks and equipment are leakproof and working correctly before using them.	Tanks and associated infrastructure will be inspected prior to first use to ensure its working correctly.
6. You must cover all bulk storage tanks. Where possible you must contain and vent tanks and vessels through suitable abatement, or direct emission to a gas recovery system.	Storage tanks covered and displaced gases vented via charcoal filters.
7. Storage systems must conform to the following CIRIA guidance: - C535 Above ground proprietary prefabricated oil storage tank systems (where relevant) - C736 Containment systems for the prevention of pollution	No oil stored on site therefore C535 N / A. Secondary containment meets CIRIA 736 requirements.
8. You must locate bulk storage vessels on an impermeable surface which is resistant to the material being stored. The surface must have self contained drainage to prevent any spillage entering the storage systems or escaping off site. Impermeable surfaces must have sealed construction joints.	All storage vessels located on an impermeable surface which is resistant to the material being stored. Stores located within secondary containment laid to fall to collection sump to prevent any spillage entering the storage systems or escaping off site. Impermeable surfaces have sealed construction joints.
9. Secondary containment (bunds) must: be constructed to CIRIA 736 Containment systems for the prevention of pollution have regular visual inspections – you must pump out or otherwise remove any contents under manual control after checking for contamination be fitted with a high level probe and an alarm have tanker connection points within the bund or provide adequate containment for spillages or leakage have programmed engineering inspections (extending to water testing if structural integrity is in doubt) be emptied of rainwater regularly to maintain the containment capacity.	Secondary containment constructed to CIRIA 736 and subject to regular inspections as part of the site Infrastructure Monitoring Programmes. Materials collected within the bund will be recovered / disposed of in accordance with Environmental Regulations. Bund will be kept clear of rainwater and other materials and integrity tested as required.
10. You must be able to close all connections to vessels, tanks and secondary containment using suitable valves. You must fit a valve close to the tank if you have bottom outlets and have at least 2 isolation points in case of valve failure.	All connection points to stores can be locked off.
11. You must direct overflow pipes to a contained drainage system (for example the relevant secondary containment) or to another vessel where suitable control measures are in place.	N / A – no overflow pipes.
7.2 Submerged or underground tanks	
The following measures apply to all processes and operations. 1. All below-ground tanks (including those partially and fully submerged) used for storing and treating waste must be constructed with secondary containment and an engineered leak detection system. They must be constructed in accordance with CIRIA 736 or an alternative recognised standard.	N / A no underground tanks used for storing or treating waste.
2. All tanks must have alarms and cut-out systems or an inspection process designed to prevent and detect over topping and leakage.	

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3. All storage tanks that require additional management, including agitation, active gas collection or aeration, must be contained and the air collected and appropriately abated or recovered.	
7.3 Lagoon storage	N / A no lagoons on site.
7.4 Storage in containers, IBCs and drums	
The following measures apply to all processes and operations. 1. You must store all waste containers, for example drums and IBCs in a way that allows safe access and inspection.	Biowastes only stored in tanks / nurse tanks. Skips will allow for safe access and inspection.
2. Where practicable, you must store containerised waste under cover. Covered areas must have good ventilation. This applies to any container held in storage, reception (pending acceptance) or quarantine. Under cover storage provides better protection for containers than open air storage and minimises production of contaminated water. Covered storage also: lowers temperature fluctuations that can cause a pressure build-up in containers reduces container degradation through weathering.	Biowastes tanks covered.
3. Where wastes are known to be sensitive to heat, light, air or water, you must make sure they are protected from such ambient conditions. These storage provisions apply to any container held in any storage area, or which is being emptied, sorted, repackaged or otherwise managed.	Biowaste tanks protect wastes from ambient conditions.
4. You must empty, re-package or otherwise manage containerised waste under cover. If this activity could produce emissions, you must carry it out in an enclosed building with suitable air extraction, abatement and drainage.	No repackaging / processing of wastes on site.
5. All waste containers must be fit for purpose, that is: - Undamaged - not corroded, if metal - have well fitting lids - suitable for the contents - with caps, valves and bungs in place and secure - within the manufacturers' use by date, particularly for plastic containers (this does not apply to certified compostable packaging destined for treatment)	All waste containers will be fit for purpose.
6. You must check on a daily basis any containers (and pallets they may be stored on) for leaks and spills.	Waste stores will be inspected on a daily basis.
7. Containers and pallets must be made safe where there is evidence or risk of spills.	Spills will be dealt with following the Spill Control Procedure.
8. You must label all containers during storage in the way they were labelled at acceptance. You must handle and store containers so that the label is readily visible and continues to be legible.	Waste storage infrastructure will be appropriately labelled.
9. You must deal with poorly labelled or unlabelled containers, for example, by re labelling, over drumming and transferring the container's contents.	Containers will be relabelled as required.
10. You must not use containers, tanks and vessels beyond their specified design life. You must only use them for the purpose, or substances, they were designed for.	Waste storage infrastructure will not be used beyond its design life.
11. To minimise emissions and reduce spills, you must maintain the integrity of waste packaging at all times, until it enters the treatment process.	N / A – waste is not received on site in packaging.

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12. You must never throw, walk on or handle wastes in a way that might damage the integrity of the packaging.	N / A – wastes are not manually handled on site.
13. You must train forklift drivers in how to handle palletised goods to minimise forklift truck damage to the integrity of containers.	N / A – wastes are not handled with forklifts on site.
14. You must design and operate your facility in a way that minimises waste handling.	Operations are designed to minimise waste handling.
15. All containers must have a lid, and the lid must be closed except when the container is being sampled, loaded or unloaded.	Biowastes are only stored in covered containers.
16. You must not stack skips containing waste.	Skips will not be stacked.
17. You must inspect storage areas, containers and infrastructure on a daily basis. You must deal with any issues immediately. You must keep written records of the inspections. You must rectify and log any waste spills.	Storage areas will be inspected daily inline with the Infrastructure Monitoring Program.
18. You must only move wastes between different locations on site (or load for removal off site) following written procedures. You must amend your waste tracking system to record these changes where necessary.	Waste will only be handled inline with written procedures that form part of the EMS.
19. You must not carry out activities with a clear fire risk within any storage area. Examples include: - Grinding - welding or brazing metal - smoking - parking normal road vehicles, except while unloading - recharging forklift truck batteries	Fire Prevention Plan implemented on site which addresses these elements.
20. If you need to carry out maintenance which may involve for example, grinding and welding, you must first remove all flammable materials. You must then carry out a detailed risk assessment following safe systems of work or permit to work.	Maintenance involving the techniques listed would only be undertaken following a detailed risk assessment / inline with safe systems of work.
7.5 Transfer of waste into and from sealed tankers and containers	
This section also applies to the transfer of liquid effluents, digestate and slurries. The following measures apply to all processes and operations. 1. You must transfer the waste from or to a tanker, or to a drum or tank, in a dedicated area.	Transactions to and from stores made within a dedicated area.
2. You must have a documented process and make sure staff are trained on how to complete checks and transfers.	Waste Delivery and Storage Procedures Form part of the EMS and staff will be suitably trained in these.
3. Your staff must supervise tanker discharges or transfers. You should book in tankers and allow the appropriate amount of time for safe transfer.	All transactions to and from stores will be supervised and deliveries made only when site has suitable capacity.
4. You must have a system to prevent a vehicle pulling away whilst still coupled. You must have measures for making sure couplings are correctly fitted. This will prevent couplings from loosening or becoming detached.	Waste Delivery Procedures Form Part of the EMS and include instructions to uncouple. Tanks will be fitted with break rings to ensure tanks are protected from tankers driving away while still connected.
5. You must provide, maintain and clean your own couplings to guarantee their integrity and fitness. You must also: - make sure that a coupling can withstand the maximum shut valve pressure of the transfer pump	Couplings will be provided, kept clean and maintained.

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- maintain a sound coupling at each end of the transfer hose, even when a gravity feed system is in place, and you must protect the transfer hose - contain all leaks or drips from coupling devices using as a minimum drip trays	Couplings will withstand shut off pressure, be sound and drip trays implemented.
6. You must make sure that transfers from tankers only take place after you have completed waste acceptance checks and then only with the approval of a responsible person. You must record: - which batch or load of material is for transfer - the receiving storage vessel - the equipment required, including spillage control and recovery equipment - any special provisions relevant to that batch or load, including minimising fugitive emissions	Deliveries will only take place following completion of waste acceptance checks by a responsible person and records will be held of the items listed.
7. You must have measures for preventing over filling such as a shut-off valve.	Deliveries made direct from tanker and supervised. Delivery would be stopped by tanker driver to prevent overfilling.
8. You must only transfer waste after completing a suitable verification and after compatibility testing.	Only waste acceptable under the Permit to be delivered to site.
9. You must unload tankers containing animal by-products using a sealed pipe. You must do this in a building fitted with an appropriately designed and engineered air collection and abatement system.	ABP unloaded with sealed pipe. Fixed roofed storage tanks are external and fitted with abatement equipment. Controls are in place to ensure there is no environmental risk from handling this material, such as secondary containment and proactive odour monitoring
10. You must carry out routine maintenance checks on pump seals and filter pots.	Routine maintenance checks will be undertaken on transfer equipment.
11. You must have emergency containment areas for leaking vehicles to prevent pollution. You should have a lockable isolating valve fitted to the loading connection. This is kept locked during periods when the unloading points are not supervised.	Leaking vehicles will be held in secondary containment area.
12. If you use a delivery tanker to collect and transport digestate (from AD or TAD), you must make sure there is no risk of cross-contamination, for example delivering mixed food waste and leaving with pasteurised digestate.	No risk off cross contamination as tankers will follow our wash out schedule implemented as part of the EMS.
13. You must have systems and procedures for making sure that wastes for transfer comply with The Carriage of Dangerous Goods and Use of Transportable Pressure Equipment Regulations 2009 (CDG) when they are packaged and transported.	Systems in place to ensure compliance with the regulations listed where applicable.
14. You must retain spillages within the contained areas and collect those promptly using pumps or absorbents. You must record any spillages.	Spillages will be contained on site and records made following our spill control procedure.
15. If you use rotary type pumps, they must be equipped with a pressure control system and safety valve.	N / A no rotary type pumps.
16. You must pump liquids and sludges instead of using open movement.	Liquids and sludges pumped.
7.6 Drainage	
The following measures apply to all processes and operations. 1. You must inspect on a weekly basis all drainage channels, aeration channels and collection sumps to identify blockages caused by debris and condensate.	Only collection sump on site. This will be inspected weekly inline with the infrastructure monitoring programme implemented on site.
2. You must remove debris and clean the channels and sumps to prevent odour, pest infestations and maximise drainage and air flow through aeration channels.	Sumps will be kept free of debris.

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3. You must appropriately characterise leachate or liquors sent for off-site recovery or disposal in line with WM3. This waste is coded as either 16 10 01* or 16 10 02 depending on assessment and characterisation.	Waste generated from operations and removed from site will be done so following our Waste Procedure which links to WM3.
7.7 Tank Inspection and Maintenance	
The following measures apply to all processes and operations. 1. You must monitor substrate levels in all storage tanks, vessels and lagoons used to hold liquids, sludge's and digestate.	Levels monitored as part of Waste Delivery and Infrastructure Monitoring Procedures.
2. Storage vessels used for liquids, sludges and digestate must have a freeboard as recommended by the plant manufacturer.	Necessary freeboard levels maintained.
3. You must equip all storage tanks with an automatic level monitoring system and an associated alarm and cut-out out system to protect against over-filling. These systems must be sufficiently robust (for example, be able to work if sludge and foam are present) and regularly maintained.	Wastes not mixed so minimal potential for foaming events. Visual level indicators installed and monitored during delivery. Deliveries would be halted when level gauge indicated stores are at working capacity. There is no transfer between stores, therefore, automated monitoring system not considered appropriate as a trigger mechanism to protect against overfilling, given every transaction to and from a store will be supervised.
4. A competent person must inspect tanks, pipework and fittings, following a written programme of inspection. A competent person must also determine the scope and frequency of the examination. You must work out how often to carry out these internal examinations using a risk assessment approach. This should be based on the: - design, specified design life and intended use of tank, pipework or fittings - age, maintenance and service history - known and potential damage mechanisms and their rates of occurrence - operational and thermal stresses - influence of cyclic and pressure loadings - bio-chemical influence of the substrate stored or carried	A competent person will inspect tanks, pipework and fittings inline with a written Infrastructure Monitoring Programme.
5. You must act on the results of all inspections and carry out any necessary repairs to make sure the tanks remain fit for service. You must keep records of the results of inspection and any repairs.	Results of inspections will be acted on.
6. You must have systems in place to make sure that loading, unloading and storage are safe, considering any associated risks. This can include: - having pipework and instrumentation diagrams - using ticketing systems - using key locked coupling systems - having colour coded points, fittings and hoses - using specific coupling or hose sizes for certain waste transfers	This is a simple Waste Storage and Transfer Operation. All transactions to and from stores will be supervised and follow procedures detailed within the EMS.

Biowaste Appropriate Measure	Site Assessment v Appropriate Listed Measure
7. If you operate a new facility, you must cover tanks, vessels or lagoons that store or treat hazardous or liquid wastes with fixed covers.	Fixed covers installed on storage tanks.
8. The following must be fit for purpose and resistant to the wastes being stored and carried: - pipes - hoses - connections - couplings - transfer lines	Connection points, couplings and distribution pipework resistant to the wastes stored and transferred.
9. You must use a suitable pipework coding system (for example RAL European standard colour coding).	N / A – No pipework in place other than delivery and collection pipework to allow transfer to and from vehicles.
10. You must monitor the transfer of liquids and sludges between tanks and this must be linked to an alarm or cut-out system.	N / A – No transfer between tanks.
11. Your staff must supervise loading and unloading activities, either directly or using CCTV.	Deliveries and collections supervised.
12. You must work out how often to carry out external inspections using non-destructive testing (NDT) methods.	Tanks inspected in line with an appropriate infrastructure monitoring programme.
13. You must schedule removing grit and sediment from storage tanks and lagoons at appropriate intervals, determined by a written programme of inspection. Grit and sediments removed from tanks and grit traps will be a waste when discarded and therefore subject to waste regulatory control. You must not deposit them into lagoons.	Storage tanks stirred to minimise the build-up of solids within the stores. Grit removal more appropriate for treatment sites which we are not. Removal of sediments will be schedules and sediment recovered / disposed inline with relevant Environmental law.
11. Emissions Control	
Emissions control related appropriate measures for biological waste treatment. 1. You must review your activities to identify opportunities to minimise and where possible contain, treat and abate emissions.	This section has been considered but is not applicable as no waste treatment undertaken on site.
11.1 Emissions Inventory	
The following measures apply to all processes and operations. 1. You must identify, characterise and control all emissions from your activities that may cause pollution. This includes all emissions to air and water (including emissions to sewer) from your facility.	Only emission source is displaced gas from storage tanks. These are listed in Permit application and will be suitably abated.
2. Your emissions inventory must include information about the relevant characteristics of the emission to air and water, such as: - flammability, lower and higher explosive limits and reactivity - other substances present that may affect the waste gas treatment system or plant safety (for example, oxygen, nitrogen, water vapour, dust) - average and maximum values and variability of flow, pH, temperature, and conductivity	

Biowaste Appropriate Measure	Site Assessment v Appropriate Listed Measure
- average and maximum concentration and load values of relevant substances and their variability – for example, COD and TOC, nitrogen species, phosphorus, metals, priority substances or micro pollutants speciated organic compounds and ammonia - data on bio eliminability – for example, BOD, BOD to COD ratio, Zahn Wellens test, biological inhibition potential (such as, inhibition of activated sludge)	
11.2 Emissions Monitoring and Limits	
The following measures apply to all processes and operations. We may set emission limits and monitoring requirements in your permit, based upon your emissions inventory and environmental risk assessment. We may set additional limits and monitoring requirements for certain processes, for example dust and total volatile organic compounds. 1. Where you are required to monitor emissions to comply with the requirements of your environmental permit you must follow our monitoring guidance.	Given the basic nature of operations and lack of point source emissions, emission limits are not anticipated to be included within the Permit.
2. For relevant emissions to water or sewer identified by the emissions inventory, you must monitor key process parameters (for example, waste water flow, pH, temperature, conductivity, or BOD) at key locations. For example, these could either be at the: - inlet or outlet (or both) of the pre treatment - inlet to the final treatment - point where the emission leaves the facility boundary	N / A – no emissions to water or sewer.
11.3 Meteorological conditions	
1. You must monitor and record meteorological conditions or have access to meteorological data for the site location. This is so you can forecast wind speed, air temperature and wind direction.	Measures listed in this section not considered appropriate as we are a basic transfer operation with quick rotation timescales, therefore, normal weather patterns will not impact on how we operate and remain in compliance with our Permit.
11.4 Bioaerosols	
1. You must take measures to minimise the release of bioaerosols from your process.	Environmental Risk Assessment submitted as part of the application has demonstrated that there is insignificant risk of bioaerosols to impact on off-site receptors. The measures listed are not appropriate as this is not a treatment operation and there is insignificant risks for bioaerosols as wastes with bioaerosol potential are contained under normal operations.
11.5 Emissions of odour	
The following measures apply to all processes and operations. 1. You must develop and implement an odour management plan.	Odour Management Plan submitted as part of the Permit application

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2. Where you expect odour pollution at a sensitive receptor, or it has been substantiated, you must monitor: using dynamic olfactometry following EN 13725 to determine the odour concentration to EN 16841 1 or 2 to determine the odour exposure to an alternative ISO, national or other international standards	Environmental Risk Assessment submitted as part of the application has demonstrated that there is insignificant risk of odour to impact on off-site receptors.
3. You must review your odour management plan as part of your environmental management system. It must include all of the following elements: - actions and timelines to address any issues - a procedure for doing odour monitoring - a procedure for responding to identified odour incidents, for example, 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 reduction measures	Odour Management Plan includes commitments to review and includes all elements listed.
11.6 Point source emissions to air	
The following measures apply to all processes and operations. The Environment Agency views all abatement and gas clean up systems as point source channelled emissions regardless of whether they are open or have a stack. 1. To reduce point source emissions to air (for example ammonia, dust, organic compounds and odorous compounds) from your biological treatment process, you must use one or more of the relevant abatement techniques, such as: bio filtration, bio trickling or bio scrubbing scrubbing (for example wet or chemical) adsorption, for example activated carbon thermal oxidation fabric filter – for mechanical biological treatment to remove dust	Activated carbon filters used to abate displaced gases from new waste storage tanks.
2. You must assess the fate and impact of the substances emitted to air, following the Environment Agency's air emissions risk assessment methodology.	Environmental Risk Assessment submitted as part of the application has demonstrated that there is insignificant risk of odour to impact on off-site receptors.
3. To make sure the abatement system is effective in treating odorous and other emissions you must monitor and maintain your abatement to achieve optimum conditions at all times. To demonstrate effective control, monitoring and assessment may include the following parameters: - gas flow or loading rate - bacterial viability (applicable to bio-oxidisation treatment systems) - pH - acid growth (indicated by pH)	Abatement systems will be monitored as part of the EMS implemented on site. This will include pro-active odour boundary monitoring and planned preventative maintenance to ensure charcoal is replaced before it is saturated.

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- gas temperature - pollutant removal efficiency rate - chemical injection (redox potential – applies to chemical scrubbing and bio-oxidisation systems) - spent solutions (for waste recovery or disposal) - humidity or moisture content - back-pressure - thatching and compaction of media in biofilters (thatching is forming a natural barrier to prevent the ingress of additional water to the surface layer) - channelling (preferential pathways for gas flow) and vegetation growth in biofilters - ammonia, hydrogen sulphide and odour concentrations (in both input and exhaust gas streams) - energy requirements for providing adequate and continuous airflow	
4. You must observe trends and changes over time which could indicate that additional maintenance or replacement is needed.	Pro-active odour monitoring and maintenance records will allow for trends to be stablished.
5. You must have: - procedures to deal with a loss in abatement efficiency due to toxic compounds - a program of filter media replacement which is informed by performance and condition - a program to replenish chemical reagents in abatement scrubbers - procedures for commissioning new filter media or abatement	Procedures will be implemented as part of the EMS to cover the elements listed.
6. At least once a year, you must carry out an efficiency assessment of your abatement system.	Efficiency will be tested either using drager tubes or by sending carbon for analysis.
Activated carbon The following measures apply to all processes and operations. 22. You must monitor your activated carbon filter for the following parameters: - inlet and outlet gas temperature and flow rate by continuous monitoring - inlet moisture content or humidity - back-pressure - carbon bed temperature - ammonia - hydrogen sulphide - odour	Measures listed are more appropriate for waste treatment system infrastructure. The carbon filters implemented in this instance are for storage tanks and their configuration is inline with how the filters are implemented for storage tanks containing odorous materials on other Permitted sites such as abattoirs.
23. You must make sure you either replace or regenerate the carbon before saturation.	
24. You must make sure the concentrations of volatile organic compounds within the gas stream are below their lower explosive limit.	
25. You must make sure you follow the manufacturers' recommended maximum operating temperature.	
26. You must use a cooling system if you exceed the upper temperature limit.	
27. You must minimise particulates in the waste gases before they reach the carbon filter.	
28. You must not allow exothermic reactions when maintaining activated carbon filters.	

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29. You must store activated carbon safely to prevent spontaneous combustion. You must store it following supplier or manufacturers' recommendations	
11.10 Pests	
The following measures apply to all processes and operations. 1. You must manage waste in a way that prevents pests and vermin.	The Environmental Risk Assessment submitted with the Permit application has demonstrated there to be insignificant potential for amenity issues generated by site operations to impact on sensitive receptors.
2. You must make your pest and vermin management plan part of your environmental management system and it must include procedures for: - inspecting for pests and vermin and for controlling them - rejecting loads of infested waste - treating pest and vermin infestations promptly - storing, handling and using approved pest and vermin control products - Information on using pest control chemicals at work is available from the HSE.	Pest control in place already on site as part of farming operations. Waste pre-acceptance and acceptance procedures will ensure no loads of infested wastes are accepted onto site.
Fly prevention and management 3. Making sure you implement fully all appropriate measures will proactively decrease the incident of flies on site.	No realistic potential for flies to become an issue given wastes with the potential to generate flies are stored within sealed tanks.
4. You must have a process to count and record the number of flies on site.	Fly counts would be undertaken if required.
5. You must have a process to investigate and resolve fly infestation.	Communication and Complaints Procedure implemented as part of the EMS would investigate and resolve.
6. You must reject maggot and fly infested waste.	Waste pre-acceptance and acceptance procedures will ensure no loads of infested wastes are accepted onto site.
7. You must make sure you have effective cleaning and housekeeping.	Site will be kept clean and tidy in line with the Infrastructure Monitoring Programme implemented on site.
8. You must use fly treatment equipment and chemicals where approved and appropriate. The HSE require that anyone using pesticides professionally should have received adequate instruction, training, and guidance in their correct use.	Fly treatment equipment and chemicals only used where approved and appropriate.
9. Under the COSHH Regulations (2002) you must document all activities involving pesticides (for example, storage, use and disposal). You must keep these records for a period of at least 3 years.	In the unlikely event of the use of pesticides, this would be documented.
10. You must use all knockdown sprays, pesticides and larvicides according to the manufacturer's instructions and licence. You may be required to submit a pest management plan for approval by the Environment Agency.	In the unlikely event of the use of pesticides, this would be documented to demonstrate use as per manufacturers instructions.
11.11 Emissions of Noise and Vibration	
The following measures apply to all processes and operations. You should locate potential sources of noise (including building exits and entrances) away from sensitive receptors and boundaries. 1. You must locate buildings, walls, and embankments so they act as noise screens.	The Environmental Risk Assessment submitted with the Permit application has demonstrated there to be insignificant potential for noise generated by site operations to impact on sensitive receptors.
2. You must use measures to control noise, including:	Appropriate measures employed including –

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- maintaining plant or equipment parts which may become more noisy as they wear out (for example, bearings, air handling plant, the building fabric, and specific noise attenuation kit associated with plant or machinery) - closing doors and windows to prevent noise breakthrough - avoiding noisy activities at night or early in the morning - minimising drop heights and the movement of waste and containers - using white noise reversing alarms and enforcing the on site speed limit - using low noise rated equipment (for example, drive motors, fans, compressors, pumps) - adequately training and supervising staff - providing additional noise and vibration control equipment for specific noise sources (for example, noise reducers or attenuators, insulation or sound proof enclosures)	- avoiding noisy activities at night or early in the morning. - using low noise rated equipment. - adequately training and supervising staff.
3. You should have a noise and vibration management plan. This must be part of the environmental management system and must include: - actions and timelines to address any issues - a procedure for doing noise and vibration monitoring - a procedure for responding to identified noise and vibration events, for example, complaints - For noise, a noise impact assessment using the BS 4142:2014+A1:2019 'Methods for rating and assessing industrial and commercial sound' methodology must inform your plan. For vibration, a vibration impact assessment using the BS 6472-1:2008 'Guide to evaluation of human exposure to vibration in buildings. Vibration sources other than blasting' methodology must inform your plan.	The Environmental Risk Assessment submitted with the Permit application has demonstrated there to be insignificant potential for noise generated by site operations to impact on sensitive receptors, therefore, implementation of a Noise Management Plan is not considered appropriate. The EMS would trigger a noise management plan to be implemented if noise was detected to be an issue.
11.12 Point source emissions to land and water (including indirect discharge to sewer)	
The following measures apply to all processes and operations. 1. You must ensure you have the relevant trade effluent consents in place with your local water company.	N / A – there are no point source releases to land, water or sewer from site.
11.13 Fugitive emissions to land and water	
The following measures apply to all processes and operations. 1. You must use appropriate measures to control potential fugitive emissions to land and water and make sure they do not cause pollution.	Environmental Risk Assessment submitted in support of the application details there is insignificant risk for fugitive emissions to impact on receptors.
2. You must have the following measures in place in operational areas: - an impermeable surface - spill containment kerbs - sealed construction joints - connection to a contained drainage system	Main operational area is fitted with an impermeable surface and secondary containment. The Environmental Risk Assessment submitted in support of the application details there is insignificant risk for fugitive emissions to impact on receptors.
3. You must collect and treat separately each water stream generated at the facility, for example, surface run off water or process water. Base how you separate it on the pollutant content and the treatment needed.	No waste waters produced or collected from the process under normal operations. Waste waters / spillages would be dealt with

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	following the Waste Procedure within the EMS to ensure they are handled correctly.
4. You must make sure that you segregate uncontaminated water streams from those that need treatment.	Uncontaminated water streams are segregated. This is a simple transfer process with no effluents generated under normal operations.
5. You must use suitable drainage infrastructure to collect surface drainage from areas of the facility where you store, handle and treat waste. You must also collect wash waters and any spillages. Depending on the pollutant content, you must either recirculate what you have collected or send it for further treatment.	Suitable infrastructure is in place. Waste waters / spillages would be dealt with following the Waste Procedure within the EMS to ensure they are handled correctly.
6. You must take measures to prevent emissions from washing and cleaning activities, including: directing liquid effluent and wash waters to foul sewer, or collecting them in a contained system for off site disposal – you must not discharge them to surface or storm drains using biodegradable and non corrosive washing and cleaning products storing all detergents, emulsifiers and other cleaning agents in suitable bunded or containment facilities within a locked storage area, or in a building away from any surface water drains preparing working strength cleaning or disinfection solutions in contained areas of the site and never in areas that drain to the surface water or groundwater	N / A - No cleaning or washing activities undertaken on site.
7. Container washing equipment must be purpose built, located in a designated area of the facility provided with self-contained drainage.	N / A - No container washing on site.
8. You must design the container wash to collect and contain all wash waters, including any spray.	N / A - No container washing on site.
9. You must use trained staff to operate the container wash and you must inspect and maintain it regularly.	N / A - No container washing on site.
10. You must have measures to prevent pollution from the on-site storage, handling and use of oil and fuel.	N / A – No oil or fuel used on site.
11. You must produce and implement a spillage response plan and train staff to follow it and test it.	Staff training in the Spill Control Procedure implemented as part of the EMS.
12. You must have procedures and associated training in place to make sure that you deal with spillages immediately.	Staff trained to deal with spillages immediately.
13. You must locate spill kits close to areas where spillages could occur and make sure relevant staff know how to use them. You must replenish the kits after use.	Spill kits located close to where spillages can occur, are replenished after use and staff know how to use them,
14. You must stop spillages from entering drains, channels, gullies, watercourses and unmade ground. You must have the following available, to use when needed: - proprietary sorbent materials - sand - booms or drain mats (or both)	Spill kits available on site including absorbent materials.
15. You must make sure your spillage response plan includes information about how to recover, handle and correctly dispose of all waste produced from a spillage.	Spill Control Procedure implemented as part of the EMS ensures spills are dealt with correctly.
16. For subsurface structures, you must: establish and record the routes of all site drains and subsurface pipework identify all sub surface sumps and storage vessels engineer systems to minimise leaks from pipes and make sure you can detect them quickly if they do occur, particularly for hazardous substances provide secondary containment and leakage detection for sub surface pipework, sumps and storage vessels establish an inspection and maintenance programme for all subsurface structures, for example, pressure tests, leak tests, material thickness checks or CCTV	The only subsurface infrastructure is a sealed sump within the secondary containment bund that will capture rainwater under normal operation.

Biowaste Appropriate Measure	Site Assessment v Appropriate Listed Measure
	The sump will be subject to integrity tests to ensure it remains sound and not leaking.
17. You must design appropriate surfaces and containment or drainage facilities for all operational areas, taking into account: - collection capacities - surface thicknesses - strength and reinforcement - falls (of the land) - materials of construction - permeability - resistance to chemical attack - inspection and maintenance procedures - available relevant standards of construction	Surfaces and containment considered appropriate. Containment designed to CIRIA 759 and Secondary containment constructed inline with CIRIA 736.
18. You must have a documented inspection and maintenance programme to review the integrity of impermeable surfaces and water containment facilities. This must consider the plant and equipment manufacturers' recommended maintenance practices.	Site storage and secondary containment infrastructure will form part of the Infrastructure Monitoring Programme implemented on site