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Appropriate Measures Assessment [Biosolids liming]

v1.0

Environmental and sustainability solutions provided to
Enva Scotland Ltd



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1.0 Introduction

1.1 Context and purpose

Enva Scotland Ltd (hereon referred to as 'Enva') have commissioned Walker Resource Management Limited (WRM) to undertake an Appropriate Measures (AM) assessment for a bespoke permit for the treatment, namely liming, of non-compliant biosolids using the following

- [Non-hazardous and inert waste: appropriate measures for permitted facilities - Guidance - GOV.UK](#)
- [Biological waste treatment: appropriate measures for permitted facilities - Guidance - GOV.UK](#)

This AM assessment has been applied to the management and operation of the liming facility (including odour control, containment, and site management) and, along with the technical criteria for lime stabilisation and pathogen reduction which are derived from [The Sludge \(Use in Agriculture\) Regulations 1989](#) and the [Department of the Environment](#) Code of Practice for the Agricultural Use of Sewage Sludge guidance [Sewage sludge in agriculture: code of practice for England, Wales and Northern Ireland - GOV.UK](#), which remain the sector-specific standards for sewage sludge treatment, forms a key part of the Permit Application. This report has been produced by WRM to support Enva's permit application and forms part of the wider Environmental Management System (EMS) for the site.

1.2 Assessment process

As stated within the guidance, the measures that are suited to site depends on the activities carried out; the size and nature of the activities; and the location of the facility.

The following tables present each of the relevant areas of the appropriate measures and then assesses information from the relevant document of the EMS against the relevant appropriate measure and guidance. The EMS as well as other key documents, have been consulted with to undertake this AM assessment.

2.0 CROSS-MAPPING: APPROPRIATE MEASURES VS SLUDGE LIMING

2.1 Management system and competence

Appropriate Measures requirements

- Management systems proportionate to risk
- Defined responsibilities
- Staff competence and training

Application to sludge liming

Liming process operated under a documented process control plan (lime dose, target pH, mixing, residence time).

Operator training focused on:

- Lime handling and COSHH
- pH verification and record-keeping
- Sludge Regulations compliance

2.2 Waste acceptance, pre-acceptance and tracking

Appropriate Measures covers

- Pre-acceptance checks
- Waste characterisation
- Record keeping

Application to sludge liming

Incoming sludge acceptance based on:

- Origin (sewage sludge only)
- Dry solids
- Metal concentrations (Sludge Regs thresholds)

Waste classification undertaken pre-liming, with post-liming confirmation if required.

Important distinction

- Acceptance is driven by sludge regulatory controls, not inert/non-hazardous waste acceptance protocols.
- No requirement for landfill-style WAC or leachability limits.

2.3 Storage, containment, and surfaces

Appropriate Measures covers

- Sealed surfaces
- Containment of liquids
- Run-off control

Application to sludge liming

Sludge and lime handled on:

- Engineered pads with runoff capture
- Liquors retained within the sludge matrix or returned to treatment.

A. Odour, dust, and emissions

Appropriate Measures covers

- Emission prevention
- Odour management plan
- Dust suppression

Application to sludge liming

Lime addition typically reduces odour potential by:

- Raising pH
- Inhibiting biological activity

Dust managed through:

- Controlled lime addition
- Purpose designed and constructed dosing system

2.4 Treatment effectiveness and process control

Appropriate Measures covers

- Treatment must achieve intended outcome
- Process control and monitoring

Appropriate Measures covers:

- Monitoring
- Documentation

- Verification records

Appropriate Measures does not cover

- Alternative treatment standards
- Arbitrary performance criteria
- Re-validation against non-sludge regimes

Treatment efficacy is defined by

- Sludge (Use in Agriculture) Regulations
- DEFRA Code of Practice (pH/time benchmarks)

3.0 ASSESSMENT

3.1 General Management

These are appropriate measures for the environmental management of a regulated facility permitted to store, treat or transfer (or both) non-hazardous and inert waste.

Ref	General management appropriate measures	Implementation
2.1	<i>Management system</i>	
1	<i>You must have an up-to-date written management system, and activities at your facility must follow it. Your management system must incorporate the following features.</i> <i>You have:</i> <i>management commitment, including from senior managers</i> <i>an environmental policy that is approved by senior managers and includes the continuous improvement of the facility's environmental performance, so you can identify pollution risks and minimise them through appropriate measures</i> <i>You plan and establish the resources, procedures, objectives and targets needed for environmental performance alongside your financial planning and investment.</i>	Enva have a written management system in place that includes which implements and incorporates the following techniques and features to improve overall environmental performance. The Environmental Management System (EMS) (EPR-B01) comprises documents that are reviewed and updated on a per annum basis to continually improve the environmental performance of the installation. Site management will be actively involved in daily site operations and activities, leading in house training and taking responsibility of the EMS. Site Operatives who are involved permitted activities will be trained on the EMS covering waste acceptance, handling and treatment activities. Training records will be maintained for each Site Operative and will be updated on an annual basis, or as and when required.

<i>You implement your environmental performance procedures, paying particular attention to:</i> • <i>staff structure and relevant responsibilities</i> • <i>staff recruitment, training, awareness and competence</i> • <i>communication (for example of performance measures and targets)</i> • <i>employee involvement</i> • <i>documentation</i> • <i>effective process control</i> • <i>maintenance programmes</i> • <i>management of change</i> • <i>emergency preparedness and response</i> • <i>making sure you comply with environmental legislation</i> <i>You check environmental performance and take corrective action, paying particular attention to:</i>	Site operations and permitted activities are detailed within EMS for the Site. The existing EMS incorporates an Odour Management Plan, Accident Management Plan and an Environmental Risk Assessment. The EMS will be reviewed on an annual basis and the following aspects shall be evaluated, where applicable: • Review of the EMS and its continuing suitability, adequacy and effectiveness. • Following the development of cleaner technologies and application of benchmarking. As part of the continuous improvement of the business, Senior Management attend annual management reviews. During this meeting several aspects of business performance are reviewed, which includes the implementation of the EMS. All relevant documents are produced or reviewed and authorised by a director to ensure that commitments can be implemented. Annual throughput will not exceed 45,000tpa. Daily throughput of the site will not exceed 250 tonnes. The maximum storage duration of non-compliant sludge prior to processing on site is 2 days. The maximum storage duration of treated sludge on site is also 2 days.
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- *monitoring and measurement*
- *learning from incidents, near misses and mistakes, including those of other organisations*
- *records maintenance*
- *independent (where practicable) internal or external auditing of the management system to confirm it has been properly implemented and maintained*

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

You review the development of cleaner technologies and their applicability to site operations. We would expect cleaner technologies to be considered:

- *as a result of substantiated pollution incidents*
- *when reviewing management systems*
- *when planning investment decisions, for example new items of plant*

When designing new plant, you must assess the environmental impacts from the plant's operating life and eventual decommissioning. You must make sure that new plant is authorised by your environmental permit.

You must have a written procedure for proposing, considering and approving changes to procedures or infrastructure related to storing or treating waste or pollution control. This is so you can track and control the process of change.

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

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

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

- *inventory of emissions to air and water*
- *residues management plan*
- *accident management plan*
- *site infrastructure plan*
- *site condition report for new facilities or where you are increasing the facility's area*
- *odour management plan, if required*
- *noise and vibration management plan, if required*
- *dust, mud and litter management plans, if required*
- *pest management plan, if required*
- *fire prevention plan, unless your facility does not handle combustible waste*
- *climate change risk assessment and adaptation plan*

Your management system must include a schedule of inspection and maintenance for all pollution control infrastructure, including for example the:

- *impermeable surfacing and drainage system*
- *ducts of abatement systems*

You must have a document control procedure that clearly describes how and when you will periodically review documentation and maintain version control.

	<i>Your management system must clearly set out the actual physical capacity of your facility to store and handle waste, which may be less than the quantity limits allowed by your permit. You must specify limits for the maximum:</i> <i>waste storage capacity at any one time</i> <i>daily and annual throughputs</i> <i>residence time for waste</i> <i>When doing this, you must take into account the characteristics of your facility and the waste types and the pollution risks, for example fire and odour.</i> <i>Your limits must also reflect the constraints of the available space and waste handling processes. You must include factors like seasonal changes in supplies of inputs, and markets for outputs.</i>	
1	<i>Your facility must be operated at all times by an adequate number of staff with appropriate training, qualifications and competence. You must keep records of training, qualifications and relevant experience.</i>	Staff training records are kept, please see (EPR-B01)
2	<i>If you operate a 24-hour process, you must have:</i> <i>remote or telemetric systems to make sure an alarm would be raised in the event of an incident during unmanned hours</i> <i>appropriate personnel on call to deal with these incidents</i> <i>You must explain these procedures in your management system.</i>	Not relevant as no 24-hour processes are operated.

3	<i>The design, installation and maintenance of infrastructure, plant and equipment must be carried out by competent people, including Construction Quality Assurance where appropriate.</i>	The design, installation and maintenance of infrastructure, plant and equipment is carried out by competent people as is a requirement of commercial insurance.
4	<i>You must have appropriately qualified managers for your waste activity who are members of a government approved technical competence scheme and who attend the facility as set out in our attendance guidance.</i>	A Technically Competent Manager (TCM) will be present on site for the required time each week (the 'attendance requirement') when the site is operational. CIWM (WAMITAB) Level 4 Qualification. Where they are absent, substitute cover is arranged.
5	<i>Staff carrying out waste acceptance checks, including sampling and analysis of waste, must be appropriately trained and competent to:</i> <i>• classify and characterise waste properly</i> <i>• identify whether it is suitable for your facility</i> <i>• manage any loads that do not conform to waste acceptance criteria</i> <i>• determine end of waste products</i>	Those staff carrying out waste acceptance checks have undergone appropriate training which is reinforced with regular toolbox talks.
2.3	Accident management plan	Implementation
1	<i>As part of your written management system, you must have a plan for dealing with any incidents or accidents that could result in pollution, including near misses.</i>	The Accident Management Plan (AMP) (EPR-C02) identifies the risks within the recycling operations. The risk assessment was carried out according to the parameters as listed in section 6.

2	<i>The Accident Management Plan (AMP) must identify and assess the risks the facility poses to human health and the environment. Particular areas to consider may include:</i>	The AMP has assessed the risks from the following areas;
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1. <i>waste types</i> 2. <i>transferring substances, for example filling (including overfilling) or emptying of vessels and containers</i> 3. <i>preventing incompatible substances coming into contact with each other</i> 4. <i>failure of plant and equipment, for example storage tanks and pipework, or blocked drains</i> 5. <i>failure of containment, for example bund failure or drainage sumps overfilling</i> 6. <i>making the wrong connections in drains or other systems</i> 7. <i>failure to contain firefighting water</i> 8. <i>failure of abatement systems</i> 9. <i>hazardous atmospheres in confined spaces</i> 10. <i>failure of main services, for example power, steam or cooling water</i> 11. <i>checking the composition of effluents before their emission</i> 12. <i>vandalism and arson</i> 13. <i>operator error</i> 14. <i>accessibility of control equipment in emergency situations</i> 15. <i>extreme weather conditions, for example flooding or very high winds</i>	1. Only non-compliant biosolids are accepted. Once treated these are kept separate from treated, compliant biosolids. 2. Transferring substances is only carried out in specific tasks and in specific areas, i.e., fuel filling, lubricating oil change/top up 3. The accepted waste is well understood. 4. Storage tanks are regularly inspected. Gutters/gulleys are inspected to prevent blockages from occurring. 5. Bunds and any sumps form part of the inspection program 6. Drainage systems are well understood to prevent wrong connections 7. Not applicable. 8. There is no requirement for abatement systems. 9. There are no confined spaces. 10. Not applicable. 11. There are no point source emissions. 12. The site is in a remote location and has a single access point through a locked gate from the main road. The perimeter of the site is fenced and the pad has locked gates across its entrance. 13. Operators are well trained and take part in regular toolbox talks.
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		14. The operation does not rely on control equipment that would need to be operated in emergency situations. Should extreme weather take place, the operation would be temporarily suspended.
3	<i>You must assess the risk of accidents and their possible consequences. You can use our risk assessment guidance to help you to do this. Risk is the combination of the likelihood that a hazard will occur and the severity of the impact resulting from that hazard. Having identified the hazards, you can assess the risks by addressing six questions:</i> <i>how likely is it that the accident will happen?</i> <i>what may be emitted and how much?</i> <i>where will the emission go – what are the pathways and receptors?</i> <i>what are the consequences?</i> <i>what is the overall significance of the risk?</i> <i>what can you do to prevent or reduce the risk?</i>	An Environmental Risk Assessment for the site has been carried out and is kept available for inspection (EPR-C01).
4	<i>The depth and type of accident risk assessment you carry out will depend on the characteristics of your facility and its location. The main factors to take into account are the:</i> <i>scale and nature of the accident hazard presented by the facility and its activities</i> <i>risks to areas of population and the environment (the receptors)</i>	

5	<i>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.</i>	Enva's AMP clearly defines the roles and responsibilities of all relevant staff involved in responding to accidents, ensuring accountability and an effective chain of command during incident response. Each role is supported with clear, scenario-specific guidance on managing foreseeable incidents, such as the spillage of potentially polluting liquids, fire outbreaks, or unauthorised waste acceptance. Procedures include immediate containment measures, internal and external communication protocols, use of spill kits and personal protective equipment, and environmental protection steps. Staff receive regular training and drills to ensure familiarity and competence in carrying out these responsibilities.
6	<i>You must have a suitably trained facility employee available at all times who will act as an emergency coordinator and will take lead responsibility for implementing the accident management plan.</i>	Enva ensure that a suitably trained facility employee is present on site at all times during operational hours to act as the designated emergency coordinator. This individual is fully trained in the site's AMP and takes lead responsibility for coordinating emergency responses, liaising with emergency services if required, and initiating containment and mitigation measures. Their training includes emergency procedures, communication protocols, and site-specific risks, with regular updates to maintain readiness and compliance with permit conditions.
7	<i>You must train your employees so they can perform their duties effectively and safely and know how to respond to an emergency.</i>	Enva fully acknowledge the importance of training in the waste management sector and are committed to ensuring that all employees are adequately trained to perform their duties safely, efficiently, and in full compliance with relevant legislation, including

		environmental and health and safety regulations. The training programme covers the handling of different waste types, use of equipment and PPE, site-specific procedures, and detailed emergency response protocols. Refresher training is provided regularly to ensure ongoing competence, and all training is documented to demonstrate regulatory compliance.
8	<i>You must also:</i> <i>show how you will communicate with relevant authorities, emergency services and neighbours (as appropriate) before, during and after an accident</i> <i>implement emergency procedures, including for safe plant shutdown and site evacuation</i> <i>implement post-accident procedures that include carrying out an assessment of the harm an accident may have caused and the remediation actions you will take</i> <i>consider the impact of accidents on the function and integrity of plant and equipment</i> <i>have contingency plans to relocate or remove waste from the facility, and suspend incoming waste</i>	Enva's AMP includes a robust set of procedures and protocols to ensure an effective response to any incident, with minimal risk to human health and the environment. The plan covers the following key areas: Communication with authorities and stakeholders: Enva maintain up-to-date contact details for the Environment Agency (EA), emergency services, local authorities, and neighbouring properties. Clear procedures are in place for timely communication before, during, and after an incident. This includes alerting authorities to any pollution risks or significant site impacts, keeping neighbours informed of developments where appropriate, and providing follow-up information on outcomes and remedial actions. Emergency procedures – Shutdown and evacuation: The AMP sets out safe shutdown procedures for all plant and equipment to prevent escalation of incidents. Evacuation routes, muster points, and roles for emergency

	• <i>test the accident management plan by carrying out emergency drills and exercises</i>	wardens are clearly defined. Staff are trained to initiate site evacuations and isolate key systems safely and efficiently.
9	<i>After a flooding event you must inspect and assess the integrity of affected plant and equipment, in particular infrastructure that may have been in contact with floodwater or groundwater. Tank inspections should include non-destructive testing methods to verify their integrity.</i>	Post-incident procedures – Harm assessment and remediation: After an incident, a formal assessment is conducted to determine the nature and extent of harm caused to human health, the environment, or infrastructure. Enva document all findings and implement appropriate remediation actions, including clean-up, containment, disposal of contaminated materials, and reporting to the EA where necessary.
10	<i>You must take the following measures, where appropriate, to prevent events that may lead to an accident. You must have appropriate procedures set out in your accident management plan.</i>	Plant and equipment integrity: All incidents are reviewed for their potential impact on the function and structural integrity of plant and equipment. Any compromised assets are taken out of service and inspected before resuming operations, ensuring safety and preventing further risk. Contingency plans for waste management: Enva have contingency plans in place to relocate or remove waste from the site in the event of a major disruption. These include identifying alternative authorised facilities and hauliers. Acceptance of incoming waste is suspended during significant incidents to prevent site overload and ensure safety. Testing the AMP – Drills and exercises:

		The AMP is tested regularly through emergency drills and simulated scenarios where appropriate. These exercises involve staff across relevant roles and are reviewed to identify improvements. Outcomes are documented, and the plan is updated accordingly to ensure continual improvement and compliance with permit conditions.
Preventing accidental emissions		
11	<i>You must make sure that you contain the following (where appropriate) and route to the effluent system (where necessary and lawful):</i> • <i>process waters</i> • <i>site drainage waters</i> • <i>emergency firefighting water</i> • <i>chemically contaminated waters</i> • <i>spillages</i>	Please see the site's AMP and Environmental Risk Assessment.
12	<i>You must have planned for how you will manage the impacts of tidal surges and storm water flows. You must consider abnormal operating scenarios and incidents, for example, by providing buffer storage capacity. You should take into account the:</i> • <i>nature of the pollutants</i> • <i>potential pathways</i> • <i>effects of downstream waste water treatment</i>	

	<i>sensitivity of the receiving environment</i>	
13	<i>If buffer storage capacity is required, you can only discharge from it after you have assessed the water for contamination, in order to identify an appropriate disposal route.</i>	
14	<i>You must implement spill contingency procedures to minimise the risk of an accidental spill entering watercourses or sewers or contaminating land.</i>	
15	<i>You must take account of additional firefighting water flows or firefighting foams, as set out in our fire prevention guidance. You may need infrastructure like emergency storage lagoons to prevent contaminated firefighting water from reaching a receiving water body.</i>	
16	<i>You must consider and, if appropriate, plan for the possibility that you may need to contain or abate accidental emissions from:</i> <i>overflows</i> <i>tank failures</i> <i>tank wall penetrations</i> <i>site plant or machinery leaks</i>	
Security measures		
	<i>You must have security measures (including staff) to prevent unauthorised access to your facility, so preventing:</i>	Please see the site Environmental Risk Assessment.

	• <i>damage to equipment</i> • <i>theft</i> • <i>illicit dumping and fly-tipping</i> • <i>arson</i>	
17	<i>Depending on your risk assessment, facilities must use an appropriate combination of:</i> • <i>security guards</i> • <i>total enclosure (usually with fences)</i> • <i>controlled entry points</i> • <i>lighting</i> • <i>warning signs</i> • <i>24-hour surveillance, such as CCTV</i>	
Fire prevention		
18	<i>If your permit allows you to store or treat combustible waste, you must have a fire prevention plan that meets the requirements of our guidance.</i>	Due to the nature of the materials involved, non-compliant biosolids, an approved Fire Prevention Plan (FPP) is not required for the site.
19	<i>You must maintain plant control in an emergency using one or a combination of:</i> • <i>alarms</i> • <i>trips and interlocks</i>	Equipment fires are covered within the AMP.

	<i>automatic control systems</i> <i>tank level readings such as ultrasonic gauges, high level warnings, process interlocks and process parameters</i>	
20	<i>You must:</i> <i>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</i> <i>maintain plant in a good state through a preventive maintenance programme and a control and testing programme</i> <i>use techniques such as suitable barriers to prevent moving vehicles damaging equipment</i> <i>implement procedures to avoid incidents due to poor communication between operating staff – during shift changes and following maintenance or other engineering work</i>	
Record keeping and procedures		
21	<i>You must:</i> <i>keep an up-to-date record of all accidents, incidents, near misses, changes to procedures, abnormal events, and the findings of maintenance inspections</i>	Enva are fully committed to complying with the EA notification requirements and will notify the Agency without delay upon detection of any event that is causing, or may cause, significant pollution. This includes:

	• <i>carry out investigations into accidents, incidents, near misses and abnormal events and record the steps taken to prevent their reoccurrence</i> • <i>maintain an inventory of substances which are present (or likely to be) and which could have environmental consequences if they escape</i>	• Any malfunction, breakdown, or failure of plant, equipment, or systems that could impact environmental controls or site safety. • Accidents that result in or have the potential to result in pollution, harm to human health, or breach of permit conditions. • Emission of a substance not controlled by an emissions limit, where there is a risk of environmental impact. • Any breach of an emissions limit set out in the site's environmental permit.
22	<i>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:</i> • <i>a malfunction</i> • <i>a breakdown or failure</i> • <i>an accident</i> • <i>emission of a substance not controlled by an emissions limit</i> • <i>breach of an emissions limit</i>	All such incidents will be reported immediately using EA designated contact methods, with initial details followed by a full written report once investigations are complete. Internal procedures are in place to ensure that incident detection, escalation, and notification are carried out promptly and effectively by trained personnel.
	<i>You must implement a contingency plan so that you:</i> • <i>comply with all of your permit conditions and operating procedures during maintenance or shutdown at your facility, including disruption at other facilities that would affect supplies to your facility or the removal of waste from it</i>	Enva – Contingency Plan 1. Purpose This Contingency Plan outlines the measures Enva will take to:

	- do not exceed limits in your permit and continue to apply appropriate measures for storing and handling waste - stop accepting waste unless you have a clearly defined method of recovery or disposal and enough permitted capacity	- Maintain compliance with permit conditions and site operating procedures during maintenance, shutdowns, or third-party disruptions. - Prevent exceedance of storage limits. - Ensure waste is only accepted when a recovery/disposal route is in place and sufficient capacity exists.
2	You must have contingency procedures to make sure that, as far as possible, you know in advance about any planned shutdowns at waste management facilities to which you send waste.	2. Scope This plan applies to all waste management operations conducted under the site's
3	You must make your contracted or regular customers are aware of your contingency plan and of the circumstances in which you would stop accepting waste from them.	Environmental Permit, including: - Waste reception, storage, handling, and transfer. - Machinery and plant operations. - Waste dispatch and associated logistical operations.
4	You must consider whether the sites or companies you rely on in your contingency plan: - can take waste at short notice - are authorised to do so in the quantities and types likely to be needed, in addition to carrying out their existing activities	3. Triggers for implementation This plan is activated when:
5	If you could exceed your permitted limits, or compromise you storage or handling procedures, you must not discount alternative disposal or recovery options on the basis of extra cost or geographical distance.	

6 <i>You must not include unauthorised capacity in your contingency plan. If your contingency plan includes using temporary storage for additional waste at your facility, then you must make sure that your facility is authorised for this storage and you have the appropriate infrastructure in place.</i>	- Planned or unplanned maintenance or shutdown of key equipment or infrastructure occurs. - There is a disruption to third-party recovery/disposal sites receiving waste from Enva. - Waste transport issues prevent timely removal of waste. - Temporary exceedance of permitted site capacity is at risk. - Staff shortages significantly affect site operations. 4. Preventative measures To reduce the likelihood of disruption, Enva will: - Maintain service agreements with multiple authorised recovery/disposal outlets. - Schedule regular preventative maintenance of all equipment. - Train staff in emergency and contingency procedures. - Monitor site inputs and outputs daily to ensure ongoing compliance with permit and CoP limits. 5. Contingency measures 5.1 Maintenance or shutdown at Enva
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- Waste acceptance: Cease accepting waste unless recovery/disposal routes and permitted capacity are confirmed.
- Storage: Use designated storage areas only if available and within permit limits. Monitor storage levels hourly if capacity is near maximum.
- Operations: Prioritise dispatch to optimise space if mechanical plant is operational.
- Notifications: Notify the producer if storage limits are at risk or permit compliance is compromised.

5.2 Disruption at recovery/disposal facilities

- Alternative facilities: Divert waste to pre-approved, permitted alternative sites listed in the Duty of Care system.
- Holding waste: Store waste temporarily on-site only within permitted limits and in compliance with storage duration restrictions. **Only treated.**
- Waste types prioritisation: Prioritise treatment of higher-risk waste types (e.g. more odorous) to prevent elevated odour risk.

5.3 Transport or haulier disruption

- Back-up hauliers: Maintain contracts with more than one haulage company for continuity of service.
- On-site containment: Ensure storage areas are secure and, where possible, weatherproof to prevent pollution from delayed removal. The processing site itself will take place on an existing concrete slab. The slab is surrounded on 3 sides by a concrete lego block bund to form an enclosure, with heights ranging from 2- 3m. The site drainage system is in the form of falls to the rear of the slab, where any run-off will be absorbed back into the cake or retained in the gully to the rear of the slab. The concrete surface will be cleaned regularly with any water removed through the use of tankers or slurry spreading equipment.
- Customer communication: Inform key customers of delays and manage waste acceptance volumes accordingly.

6. Responsibilities

- Site manager: Coordinates implementation of this plan, oversees communication with EA and third parties.
- Operations supervisor: Manages site adjustments, staff coordination, and waste tracking.
- Admin: Tracks incoming/outgoing waste and records daily volumes.

7. Communications & Records

		• EA will be informed immediately if any breach or risk of breach to the permit occurs. • All contingency actions will be logged, including times, decisions, and corrective measures taken. • Incident reports will be reviewed and used to improve future contingency planning. 8. Plan review • This plan will be reviewed annually, and after any incident requiring activation of contingency procedures. • A record of reviews and amendments will be maintained. 9. Additional contingency provisions Enva recognises the importance of forward planning and robust communication in managing waste disruptions. To further support the effectiveness of this contingency plan, the following additional measures are implemented: • Advance awareness: The site maintains open communication with all waste recovery sites (S3-agricultural destinations) to which Enva send waste.
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	Notification is required of any planned shutdowns and seek to identify such disruptions in advance through regular contact and contract clauses. • Customer communication: Contracted and regular customers are made aware of this contingency plan. They are informed of the conditions under which Enva may stop accepting waste, including temporary shutdowns, permit constraints, or lack of recovery site capacity. • Verification of third parties: All facilities included in the site's contingency plan have been assessed to ensure they: ○ Can accept waste at short notice. ○ Are properly authorised to accept the waste types and volumes required. ○ Have the necessary infrastructure and operational capacity to do so in addition to their normal throughput. • Cost and location neutrality: If a disruption places the site at risk of breaching permit conditions or safe operating limits, Enva will not exclude authorised
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		alternatives solely due to cost or distance. Compliance and environmental protection are the overriding priorities. • Use of temporary storage: If temporary storage on-site is required as a contingency measure, the site will ensure: ○ All storage remains within the permitted capacity and conditions. ○ The required infrastructure is in place (e.g., sealed surfaces, containment, drainage). ○ The site does not rely on unauthorised or speculative capacity. ○ The EA is notified where appropriate.
Contingency measures for treatment only		
7	<i>Your management procedures and contingency plan must:</i> • <i>identify your technology's known or predictable malfunctions and the procedures, spare parts, tools and expertise needed to deal with them – so you can minimise predictable malfunctions and fix them quickly</i> • <i>include a record of spare parts held, especially critical spares, or state where you can get them from and how long it would take</i> • <i>have a defined procedure to identify, review and prioritise items of plant which need a preventative regime</i>	As part of the contingency planning, Enva have identified and allocated adequate storage capacity for compliant and non-compliant materials. Specifically, the following measures are in place: Storage for compliant materials: Enva have dedicated storage areas for materials that meet the required standards. These areas are clearly marked and segregated from non-compliant streams to prevent cross-contamination. The storage capacity is reviewed regularly to ensure it can accommodate expected volumes without exceeding limits.

	- include all equipment or plant whose failure could directly or indirectly affect the environment or human health – if the equipment or plant is process critical then you may need to stop accepting waste or shut down your process - make sure you have the spare parts, tools, and competent staff needed before you start maintenance	Storage for materials failing the required specification: Materials that do not meet the CoP specification (<pH11.5 for 2-hours) are separated and stored in a designated area for further assessment or reprocessing. These materials are securely stored in a way that minimises environmental risks and ensures they are readily available for reprocessing, recycling, or safe disposal as required. Capacity review and monitoring:
8	If you produce an end-of-waste material, your contingency planning must consider storage capacity for end-of-waste products and materials that fail the end-of-waste specification.	Enva regularly monitor storage levels for both categories of materials to ensure capacity is sufficient for anticipated throughput. If capacity limits are reached, alternative measures are immediately implemented, including, but not limited to, halting incoming waste until storage space is made available or arranging for the transport of materials off-site. Procedures for material failure: A clear procedure is in place for handling materials that fail the compliance specification, including re-testing and reprocessing to ensure compliance with regulatory requirements for recovery to agriculture. These materials are handled in compliance with waste regulations to prevent any potential risk to the environment or human health.

9	<i>Your management system must include procedures for auditing your performance against all of these contingency measures and for reporting the audit results to the site manager.</i>	The EMS includes formal procedures for auditing Enva's performance against all contingency measures outlined in the AMP, and related emergency protocols. These internal audits are scheduled at regular intervals and are also triggered following any significant incident or near miss. Each audit assesses the effectiveness, implementation, and staff understanding of contingency measures, including emergency response, communication, waste handling, and equipment shutdown procedures. Findings are documented in a structured audit report and reviewed with the Site Manager to identify any non-conformances or opportunities for improvement. Corrective actions are assigned and tracked to ensure timely resolution, and outcomes are used to update training, procedures, and the management system as needed.
2.5	Facility decommissioning	
1	<i>You must consider the decommissioning of the facility at the design stage and make suitable plans to minimise risks during decommissioning.</i>	
2	<i>For existing facilities where potential risks are identified, you must implement a programme of design improvements. These design improvements must make sure that you:</i> <i>avoid using subsurface tanks and pipework</i> <i>drain and clean out vessels and pipework before dismantling</i>	Enva carry out all operations entirely above ground.

	• <i>use insulation which you can remove easily without dust or hazard</i> • <i>use recyclable materials, taking into account operational or other environmental objectives</i>	
3	<i>You must maintain a decommissioning plan to demonstrate that:</i> • <i>plant can be decommissioned without causing pollution</i> • <i>the site will be returned to a satisfactory condition</i>	Enva maintains a comprehensive decommissioning plan to ensure that all plant and infrastructure can be decommissioned in an environmentally responsible manner, without causing pollution, and with the site returned to a satisfactory condition. The plan includes the following key elements: Decommissioning without pollution: The decommissioning plan outlines procedures to ensure that all plant, equipment, and infrastructure are decommissioned without causing environmental harm. This includes safely removing and disposing of hazardous materials, cleaning out vessels and tanks, and implementing measures to prevent pollution during dismantling. All activities will be carried out in compliance with environmental regulations and best practice. Site restoration: The plan includes detailed procedures for returning the site to a satisfactory condition following the decommissioning of plant and equipment. This involves removing or remediating any contaminated soil, repairing any damage to the land, and ensuring that the site meets environmental and regulatory standards for its intended post-

		operational use. Enva will work with environmental specialists to verify that the site is fit for future use, no matter what the land use.
4	<i>You should identify non-productive or redundant items such as tanks, pipework, retaining walls, bunds, reusable waste containers, ducts, filters and security systems and implement a programme of decommissioning and removal.</i>	The decommissioning plan identifies all non-productive or redundant items on-site, such as tanks, retaining walls, bunds and security systems. A systematic programme will be implemented to decommission and remove these items in a controlled manner. Each item will be assessed for reuse, recycling, or disposal based on its condition and environmental impact.
5	<i>You should follow our guidance on how land and groundwater should be protected at permitted facilities. You should plan for producing a site condition report, if needed to surrender your permit.</i>	Enva will adhere to EA guidance on protecting land and groundwater during the decommissioning process. This includes ensuring that any potentially polluting substances are contained and that runoff or groundwater contamination is prevented. All relevant protective measures, such as secondary containment, drainage management, and soil testing, will be followed to mitigate environmental risks. As part of the surrender of any permit, the Site Condition Report (SCR) will be updated to include the application to surrender of the permit. The report will document the site's condition at the time of surrender, including any remedial actions taken, and confirm that the site has been returned to an acceptable standard with regard to land and groundwater protection.

3.2 Waste pre-acceptance, acceptance & tracking

These are appropriate measures for waste pre-acceptance, acceptance and tracking at a regulated facility permitted to store, treat or transfer (or both) non-hazardous and inert waste.

Ref	3 Waste pre-acceptance, acceptance & tracking	Implementation
3.1	Waste pre-acceptance	
2	<i>Some facilities receive waste on an ad hoc basis. In those instances, pre-acceptance checks can still be carried out before the waste is accepted. For example, through the exchange of information at the weighbridge before acceptance on site.</i>	Please see Waste Acceptance Procedure (EPR-OP01).
3	<i>When you receive a customer query, and before the waste arrives at your facility, you must get enough information from the waste producer to satisfy yourself that the waste has been properly assessed and classified as set out in WM3.</i>	
4	<i>In the case of household and similar non-household waste (including skip waste) waste is pre-accepted by the terms and conditions of the contract in place (for example skip waste companies excluding fridges and freezers or hazardous wastes). There should also be a visual pre-acceptance check before removal from the producer's premises.</i>	

5	<i>For commercial and industrial waste you must get the following information in writing or electronic form:</i> <i>details of the waste producer including their organisation name, address and contact details</i> <i>• a description of the waste</i> <i>• the waste classification code (also referred to as a List of Waste (LoW) or European Waste Classification code</i> <i>• the source of the waste (the producer's business and the specific process that has created the waste)</i> <i>• information on the nature and variability of the waste production process</i> <i>• information about the history of the producer site if it may be relevant to the classification of the waste (for example soils and other construction and demolition arisings from a site contaminated by previous industrial uses)</i> <i>• the waste's physical form</i> <i>• the waste's composition (based on representative samples if necessary)</i> <i>• a description of the waste's odour and whether it is likely to be odorous</i>	
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	an estimate of the quantity you expect to receive in each load and in a year For mirror entry LoW codes (as defined in WM3), you must keep the evidence that you have made an assessment of the waste to assign the relevant mirror entry code.	
6	You do not need to have sample information if the origin of the waste is reliably understood and it clearly shows that the waste is non-hazardous. However, a visual assessment alone will not be enough to assess whether mirror entry waste is hazardous or not.	
7	If the waste is a mirror entry and has not been properly assessed, you must assume it is the hazardous entry as a precautionary measure. This is likely to mean that you cannot accept it at your facility. The pre-acceptance information should be verified by contacting or visiting the producer. Dealing with staff directly involved in waste production can help to fully characterise a waste.	
8	Analysis of samples must be carried out by laboratories who are UKAS or MCERTs accredited for the prescribed test.	
9	After a waste has been properly assessed and classified, you must technically assess the waste's suitability for storage and treatment at your facility to make sure you can meet your permit conditions. You must make sure that the waste	

	<i>complies with your facility's treatment capabilities and you are permitted to take that waste.</i>	
10	<i>You must keep pre-acceptance records for at least 3 years, with records preferably held electronically, following receipt of the waste. If an enquiry does not lead to receipt of the waste, you do not need to keep records.</i>	
11	<i>You must reassess the information required at pre-acceptance if the:</i> <i>waste changes</i> <i>process giving rise to the waste changes</i> <i>waste received does not conform to the pre-acceptance information</i> <i>In all cases you must reassess the information required at pre-acceptance on an annual basis.</i>	
12	<i>When you agree that you will accept waste from a customer, you should decide and record what parameters you will check at the acceptance stage. The checks could be visual, physical, chemical and odour-based parameters. You must also record the criteria for non-conformance or rejection. The person checking the waste for acceptance can also decide on their own additional parameters.</i>	
3.2	Waste acceptance	

1	<i>You must implement waste acceptance procedures to check that the characteristics of the waste received matches the information provided to you during waste pre-acceptance. This is to confirm the waste is as expected and that you can accept it. If the waste does not conform to the pre-acceptance information, you may still be able to accept the waste, but you must confirm first that your permit allows it and that your facility can handle it appropriately. Otherwise, you must reject the waste.</i>	<u>Waste Acceptance Procedure (EPR-OP01):</u> On arrival of each waste load, a trained site operative will verify that the waste matches the information provided during the pre-acceptance process. This check ensures the waste is as expected and that Enva are permitted and able to accept it safely. If the waste matches the pre-acceptance information, it will be accepted and processed or disposed according to site procedures. If the waste does not match the pre-acceptance information, Enva will take the following steps:
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		1. Review the permit: Check the environmental permit to confirm whether the non-conforming waste is allowed. 2. Assess capability: Enva will assess whether the site is equipped to handle the waste safely and without risk to the environment or human health. 3. Decide on acceptance: 4. If the permit allows it and waste can be managed safely, it will be accepted. The decisions will be documented along with the reasons for acceptance. 5. If the permit does not allow it, or Enva are not equipped to handle the waste, the load will be rejected. The reason for rejection will be recorded and Enva will notify the waste carrier immediately. All acceptance checks and any deviations from the pre-acceptance information will be documented, keeping records in line with the waste tracking procedures.
2	<i>Your procedures should follow a risk-based approach, considering:</i> 1. <i>the source, nature and age of the waste</i> 2. <i>potential risks to process safety, occupational safety and the environment (for example, from odour and other emissions)</i> 3. <i>the potential for self-heating</i> 4. <i>knowledge about the previous waste holder(s)</i>	Enva operational procedures follow a structured, risk-based approach to ensure that all waste handling, processing, and storage activities are carried out safely and with minimal environmental impact. The following risk factors are assessed and incorporated into the standard operating procedures: Source, nature, and age of the waste: Enva assess each incoming waste load based on its origin, composition, and how long it has been stored prior to arrival. This allows the identification of potential risks

		such as degradation, chemical instability, or biological activity. Older or poorly characterised wastes are subject to enhanced inspection and testing before acceptance. Process safety, occupational safety, and environmental risk: Every waste stream is evaluated for risks to plant operations (e.g. reactivity, contamination), worker health (e.g. dust, biological pathogens, hazardous substances), and environmental emissions (e.g. odour, vapours, leachate). These risks are used to inform safe handling procedures, PPE requirements, and engineering controls such as containment and ventilation systems. Potential for self-heating: Non-compliant biosolids have no potential for self-heating. Knowledge of previous waste holders: Enva have a long history of working alongside the previous waste holders and producers. Known high-risk sources or poorly documented consignments trigger additional scrutiny, including pre-acceptance sampling and verification to prevent misclassification or contamination.
3	<i>When deciding whether to accept waste, you must also check that the relevant storage areas and treatment processes in your facility have the physical</i>	As part of the waste acceptance procedure, Enva operatives carry out pre-acceptance checks to ensure that there is sufficient physical capacity in the

<i>capacity needed to handle the waste. You must not accept waste if this capacity is not available, or if you would breach your permit by doing so.</i>	appropriate designated storage areas and treatment systems before any waste is received on site. The following key principles are applied: Capacity verification: Before accepting any waste load, staff confirm that there is adequate space in the relevant storage or processing area to safely accommodate the material without overfilling or exceeding operational limits. This includes consideration of segregation requirements, stockpile heights, and fire prevention spacing. Permit compliance: Enva will not accept waste if doing so would breach the conditions of the environmental permit, such as maximum tonnage thresholds or material storage limits. All accepted waste must be within the scope of the permit's listed waste codes and authorised activities. Operational control: Site operatives and management monitor input volumes daily. If incoming waste would cause the site to exceed permitted capacity or compromise safe operations, the load is rejected or deferred, and alternative arrangements are made. Record keeping:
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		Waste acceptance decisions and capacity checks are recorded as part of the site's log and waste tracking system to provide a clear audit trail for compliance and Environment Agency inspection purposes.
4	<i>You must visually check wastes and verify them against pre-acceptance information and transfer documentation before you accept them on site. The extent of the initial visual check is based on the waste type and how it is packaged.</i>	Please see Waste Acceptance Procedure (EPR-OP01).
5	<i>You must check and validate all transfer documentation and resolve discrepancies before you accept the waste. If you believe the incoming waste classification or description is incorrect or incomplete, then you must address this with the original waste producer or waste carrier (or both) during waste acceptance. You must record any non-conformance. If you have assessed the waste as acceptable for on-site storage or treatment, you must document this.</i>	All incoming waste is subject to a thorough documentation check and validation process prior to acceptance on site. The procedure ensures that only accurately described, permitted, and compliant waste is accepted for storage or treatment. The key elements of the process are as follows:" Validation of transfer documentation: Waste Transfer Notes (WTNs) are reviewed upon arrival to verify: • EWC codes • Waste description • Source and origin • Producer and carrier details • SIC code, quantity, and any pre-notified hazards Discrepancy resolution:

		If any documentation is missing, inconsistent, or indicates a classification concern (e.g., incorrect EWC code, vague description, or mismatched load characteristics), the load is rejected. Non-conformance record: All discrepancies, misclassifications, or rejected loads are logged in the site's Waste Non-Conformance Register. This includes: • Nature of the non-conformance • Actions taken • Parties involved • Outcome (e.g., acceptance after correction, rejection, investigation) Acceptance justification: If a waste is accepted after assessment and validation (despite minor documentation issues that have been resolved), Enva record: • The reason for acceptance • Evidence of resolution • Confirmation of compliance with permit and site treatment capabilities
6	<i>You must have clear criteria that you use to identify non-conforming wastes and wastes to be rejected. You must also have written procedures for</i>	The waste rejection procedure is outlined in the Waste Acceptance Procedure. Clearly defined criteria and documented procedures are maintained for the identification, management, and prevention of non-conforming and rejected wastes.

<i>recording, reporting and tracking non-conforming and rejected wastes. These must include:</i> <i>using quarantine storage</i> <i>notifying the relevant customer or waste producer</i> <i>recording a summary of your justification for accepting non-conforming waste in your electronic (or equivalent) system</i> <i>You must take measures to prevent the recurrence of non-conforming and rejected wastes.</i>	These ensure compliance with permit conditions and protect site safety and the environment. Non-conformance criteria Non-conforming waste is identified when any of the following conditions apply: - The waste type or EWC code is not authorised under the permit. - The description or classification does not match the actual material. - The physical state (e.g., liquid instead of solid) or contamination is inconsistent with expectations. - Documentation is inadequate or incorrect. - The waste poses a risk not foreseen in pre-acceptance or operational risk assessments. In accordance with Non-hazardous and inert waste: appropriate measures for permitted facilities - 3. Waste pre-acceptance, acceptance and tracking - Guidance - GOV.UK, waste acceptance is a front-end control system intended to ensure that only permitted, described, and suitable waste is accepted onto a site. At this site: - Only one waste type (biosolids) is accepted; - Waste is supplied under a controlled contractual arrangement;
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	• The waste description, source, treatment status, and intended recovery use are predefined. Due to the above justification in addition to site capacity of 1,000t/week, with a 45,000t annual throughput to allow for expansion. The site does not have a quarantine area. Non-conforming waste procedure When non-conforming or rejectable waste is identified: The load is immediately rejected. The incident is recorded in the Non-Conformance Register, including: • Load details (origin, carrier, date/time) • Reason for non-conformance • Photos (where applicable) • Initial actions taken The customer or waste producer is notified promptly to clarify or rectify the issue. Prevention of recurrence To minimise future non-conformance: • Regular reviews are conducted of non-conformance trends and patterns. • Feedback and refresher guidance are issued to relevant producers, hauliers, or staff.
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		Staff training is updated where required. Persistent issues will be escalated to commercial management or regulatory bodies if unresolved.
7	<i>Where you reject waste which has been classified as hazardous, you must follow the procedure set out in our rejected loads guidance.</i>	In the event that a load classified as hazardous waste is rejected, Enva follow the EA guidance Hazardous waste: rejected loads guidance - GOV.UK , ensuring full compliance and traceability.
8	<i>You must weigh each load of waste on arrival to confirm the quantities against the accompanying paperwork, unless alternative reliable and representative systems are available (for example, based upon density and volume). You must record the weight in your electronic or equivalent systems, so you can monitor available capacity at your facility.</i>	Material is weighed as it leaves the Wastewater Treatment Works (WWTW) and using calibrated weigh cells on the importing and exporting road haulage vehicles. Please note that LGV weigh cells are regularly calibrated to prevent contravening Road Traffic Act Regulations regarding vehicle weight.
9	<i>The person carrying out waste acceptance checks must be trained to effectively identify and manage any non-conformances in the loads received, so you comply with your Duty of Care for waste and your permit conditions.</i>	All personnel responsible for carrying out waste acceptance checks are trained and competent to identify and manage non-conformances effectively. This training ensures compliance with: - The environmental permit conditions - All relevant permit support documents, OMP etc - The statutory Duty of Care under Section 34 of the Environmental Protection Act 1990 - Relevant waste classification, handling, and health & safety regulations

		Training content includes: • Waste classification and EWC codes • Interpretation and validation of waste transfer documentation • Identifying non-conforming or hazardous waste • Procedures for reporting, and rejecting waste • Use of site-specific acceptance criteria and permit limits • Operation of the non-conformance log and communication protocols • Emergency response in the event of misclassified or dangerous waste Training records and refreshers Training is recorded in each employee's competence file, including date, trainer, and scope. Refresher training is delivered annually or sooner where: • Procedures change • Non-conformance incidents occur • Regulatory updates are issued
10	<i>Your procedures must make sure that your staff watch waste being unloaded, so you can quarantine the waste if necessary before it is mixed with other material.</i>	To comply with permit conditions and Duty of Care, Enva's procedures ensure that all incoming waste is supervised during unloading to identify and manage any potential non-conformances immediately. This allows for the effective rejection of

	waste, preventing it from mixing with other materials until its acceptance has been validated. Supervision of unloading All incoming waste loads are monitored by a trained member of staff during unloading. This ensures any issues with the waste, such as incorrect classification or contamination, are identified before it enters the pre-treatment storage area. The unloading area is clearly defined and separated from other active storage and treatment zones. Documentation Documentation for all incoming waste, including the Waste Transfer Note (WTN), is checked and validated by the supervising staff during unloading. If discrepancies are found (e.g., misclassification or incomplete documentation), they are recorded in the Non-Conformance Register. The relevant parties (waste producer or carrier) are contacted immediately for resolution. Further actions If the waste is accepted after assessment and necessary corrections, it is allowed to be transferred to the appropriate storage or treatment area.
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		If the waste is rejected, it remains segregated until arrangements are made for its return or safe disposal. Ongoing monitoring Regular inspections and audits of the unloading and rejection processes are carried out to ensure compliance with the procedure. Staff training is refreshed regularly to maintain competency in identifying and handling non-conforming waste.
11	<i>Offloading and reception areas must have an impermeable surface with self-contained drainage, to prevent any potentially polluting liquid from escaping off site. This requirement does not apply if your facility's permit allows only inert wastes and does not require impermeable surfacing with self-contained drainage.</i>	All transfer and treatment areas are constructed with an impermeable surface and sealed drainage.
3.3	Quarantine	
1	<i>Your facility must have a dedicated waste quarantine area or areas which you use to temporarily store waste being rejected, or non-conforming waste whilst it is being assessed. Quarantine areas must have impermeable surface with self-contained drainage if there is a risk of contaminated runoff from the quarantined waste.</i>	In accordance with Non-hazardous and inert waste: appropriate measures for permitted facilities - 3. Waste pre-acceptance, acceptance and tracking - Guidance - GOV.UK, waste acceptance is a front-end control system intended to ensure that only permitted, described, and suitable waste is accepted onto a site. 1. At this site:

2	<i>Where there is a risk of fugitive emissions from quarantined waste you must store it in closed or covered containers or within a building.</i>	• Only one waste type (biosolids) is accepted; • Waste is supplied under a single, controlled contractual arrangement; • The waste description, source, treatment status, and intended recovery use are predefined.
3	<i>Quarantine storage must be separate from all other storage and clearly marked as a quarantine area.</i>	
4	<i>You should store the waste in quarantine in closed containers or cover it to prevent emissions if appropriate. For example, you should sheet quarantined contaminated soil or store it in a covered skip to prevent rainfall or wind from mobilising pollutants.</i>	The waste acceptance process therefore operates at a strategic level, rather than on a load-by-load comparative basis between different waste streams. 2. Known and consistent waste stream AM distinguishes between:
5	<i>You must have written procedures for dealing with wastes held in quarantine, including a maximum storage volume. The maximum storage time must take account of the potential for odour generation, pest infestation and storage conditions. If the waste is infested or odorous you must remove it within 24 hours or sooner.</i>	• Variable or mixed waste inputs, where uncertainty exists; and • Well-defined, consistent waste streams from known producers. The biosolids accepted at this site fall into the latter category: • The waste producer is known and pre-approved; • The waste is generated through a consistent treatment process; • The physical and chemical characteristics are predictable and controlled through routine producer monitoring. As such, the guidance expectation for temporary isolation pending classification or verification does not apply. 3. Pre-acceptance and acceptance checks Consistent with AM, waste acceptance controls are implemented through:

- Pre-acceptance checks, including:
 - Waste description and EWC code confirmation;
 - Treatment history and compliance with land application standards;
 - Review of analytical data and producer declarations.
- On-site acceptance checks, including:
 - Verification of duty of care documentation;
 - Visual and sensory inspection at delivery.

Where waste does not conform to the agreed description, AM anticipates rejection and removal, not prolonged on-site storage.

4. Rejection rather than quarantine

AM does not require quarantine areas in all cases; rather, it requires that:

- Non-conforming waste is identified, and
- Appropriate action is taken to prevent environmental harm.

At this site:

- Any non-conforming load would be rejected immediately and removed from site.
- There is no operational or regulatory benefit in isolating a load on site where:
 - No alternative waste streams are present;
 - No further assessment or reclassification would be undertaken on site.

		A quarantine area would therefore not add control or risk reduction. 5. No risk of cross-contamination A key function of quarantine under AM is to prevent: • Cross-contamination between wastes of differing characteristics; or • Mixing of authorised and unauthorised waste. Because the site accepts only one waste stream, there is no credible pathway for cross-contamination, other than for treated and non-treated biosolids. The guidance intent is therefore met through waste acceptance controls alone. 6. Proportionate application of guidance The AM is explicit that waste acceptance measures should be: • Risk-based, and • Proportionate to the nature of the operation. In this context: • The waste is homogeneous and source-controlled; • Acceptance decisions are binary (accept or reject); • Quarantine infrastructure would be redundant and unused in normal operation.
3.4	Waste tracking	

1 <i>You should use an electronic or equivalent system to hold up-to-date information about the available capacity of different parts of your facility, for example reception, quarantine, treatment and storage areas. If you do not have an electronic system you still need to hold the equivalent level of information. You should use a pre-booking system to make sure that you have enough waste storage and process capacity for the incoming acceptable waste.</i> <i>Your electronic or equivalent system must hold all the information generated during:</i> <i>• pre-acceptance</i> <i>• acceptance</i> <i>• non-conformance or rejection</i> <i>• storage</i> <i>• repackaging</i> <i>• treatment</i> <i>• removal off site</i> <i>This information must be readily accessible.</i>	To comply with permit conditions and maintain efficient operations, Enva use a written waste management system to track the available capacity of different parts of the site (e.g., reception, treatment, and storage areas). This system also records all relevant information during the waste acceptance process, ensuring smooth operation and compliance with regulations. Electronic or equivalent system Enva use a documented waste management system to track the capacity of all waste management areas, including: Reception area – for initial unloading and inspection Storage areas – pre- and post-treatment storage Treatment areas – for waste processing Pre-booking system A pre-booking system is used to ensure that the site has sufficient storage and processing capacity to handle incoming waste. Each scheduled delivery is checked against the available capacity in relevant areas. The pre-booking system verifies that there is adequate room in storage and treatment areas for the incoming waste. Waste deliveries are only accepted once capacity is confirmed to prevent overloading any area of the site.
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	Information tracking and recording The documented system holds and tracks all information generated throughout the waste management process, including: Pre-acceptance: Waste classification, waste producer information, consignment details, and suitability checks. Acceptance: Waste receipt, acceptance validation, documentation (e.g., Waste Transfer Notes), and capacity checks. Non-conformance or rejection: Records of non-conforming or rejected waste and follow-up steps. Storage: Storage location, capacity used, and tracking of individual waste loads. Repackaging: Not applicable. Treatment: Waste treatment processes, including quantities treated, methods used, and compliance checks. Removal off-site: Documentation for waste removal, including transport details, final disposal or recycling steps, and Waste Transfer Notes. Readily accessible information All information generated during the waste management process is stored securely but is readily accessible for inspection, reporting, and audit purposes.
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		Staff are trained on how to input, retrieve, and update information to maintain the accuracy and accessibility of records. System maintenance The system is regularly checked for accuracy and updated as necessary to reflect changes in available capacity, waste acceptance processes, and regulatory requirements. Any system failures or discrepancies are logged and investigated promptly to ensure regular and accurate tracking of waste data.
2	<i>You must create records and update them to reflect deliveries, on-site treatment and despatches. Your tracking system will also operate as a waste inventory and stock control system, including both wastes and end-of-waste materials produced at your facility. It must include this information as a minimum:</i> <i>the date the waste arrived on site</i> <i>the original producer's details (or unique identifier)</i> <i>a unique reference number</i> <i>waste pre-acceptance and acceptance information</i> <i>the package type and size</i> <i>the intended treatment or disposal route</i>	To comply with the permit conditions, the site uses a comprehensive waste tracking and inventory system that records, updates, and monitors the lifecycle of waste materials from delivery to disposal or recovery. This system functions as both a waste inventory and stock control system, ensuring transparency, accuracy, and compliance throughout the process. Waste arrival and documentation Arrival date: The date each waste load arrives on-site is recorded in the tracking system. Original producer's details: The system ensures the recording of the name and contact details of the original waste producer or a unique identifier for anonymous sources.

• <i>the nature and quantity of wastes held on site</i> • <i>where the waste is physically located on site</i> • <i>where the waste is in the designated recovery or disposal process</i> • <i>identifying the staff who have taken any decisions about accepting or rejecting waste streams and who have decided on recovery or disposal options</i> • <i>details that link waste to relevant transfer notes</i> • <i>details of any non-conformances and rejections, including consignment notes for waste rejected because it is hazardous</i>	Unique reference number: Each waste load is assigned a unique reference number for traceability and audit purposes. Pre-acceptance and acceptance information Pre-acceptance information: Details regarding waste classification, safety data sheets (SDS), and prior waste audits are recorded. Acceptance information: The system ensures the traceability of all details during the waste acceptance process, including Waste Transfer Notes (WTN), EWC codes, and the outcome of the waste validation process (e.g., whether the waste is accepted or rejected). Packaging and treatment information Package type and size: Not applicable. Treatment or disposal route: The intended treatment route i.e., lime treatment, is documented for each waste load. Quantity and location tracking Nature and quantity of wastes: For each delivery, the nature of the waste is recorded i.e., non-hazardous,) and the quantity on-site i.e. tonnes. Physical location: Where the waste is physically stored on the site (e.g., treatment area, storage area) is recorded using either specific location codes or a digital map for easier management.
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	Waste processing status Designated recovery process: The system ensures the monitoring of the current stage of the waste—whether it is undergoing treatment or storage—and updates the status accordingly. Staff decision records Decision-making personnel: The system tracks the staff members who make decisions about waste acceptance, rejection, and recovery or disposal options. This includes decisions on whether to accept non-conforming waste, approve recovery methods, or reject waste. Signatures and authorisation: Signatures or a record of approvals are attached to decisions for accountability. Link to relevant documentation Waste Transfer Notes (WTNs): The tracking system links each waste load to the corresponding transfer notes and consignment details for traceability. Non-conformance and Rejection Documentation: If a waste load is rejected or found non-conforming, detailed information is recorded, including non-conformance reasons, rejection details, and waste consignment notes. Real-time data updates and access
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		The system is updated in real time to ensure accurate data on waste movements, quantities, treatment processes, and locations. All records are readily accessible to authorised personnel for inspection, audits, and reporting purposes, ensuring compliance with regulations and operational efficiency. System maintenance and auditing The waste tracking and inventory system is regularly audited to ensure it meets operational and regulatory standards. Routine checks are carried out to verify the accuracy of the data, ensure all necessary fields are filled, and address any discrepancies or issues.
3	<i>The electronic (or equivalent) system must be able to report for each of LoW code:</i> <i>the total quantity of waste present on site at any one time</i> <i>a breakdown of the waste quantities you are storing pending on-site treatment or awaiting onward transfer</i> <i>where a batch of waste is located based on a site plan</i> <i>the quantity of waste on site compared with the limits in your management system and permit</i>	The site employs a comprehensive documented system that provides detailed reports for each List of Waste (LoW) code, ensuring that Enva can manage, monitor, and report on waste materials effectively and in compliance with the permit conditions. The system is designed to meet the following key reporting criteria: 1. Total quantity of waste on site Records are documented that show the total quantity of waste present on-site at any given time, broken down by LoW code. These records are updated regularly, enabling accurate monitoring of the volume of waste across all designated areas of the site.

<i>the length of time the waste has been on site compared with the limits in your management system and permit</i>	2. Breakdown of waste pending treatment or transfer The quantities of waste that are awaiting on-site treatment or pending onward transfer, categorised by LoW code. The report includes specific waste types that are temporarily stored in designated areas (e.g., treatment, storage), helping to optimise space and treatment resources. 3. Waste location tracking Each waste batch is linked to a specific location on-site and is documented. This allows staff to locate each batch of waste by LoW code, enabling quick identification of waste storage or processing areas. 4. Waste quantity compared to limits The waste management system provides a real-time comparison of the total quantity of each waste type on-site versus the capacity limits specified in the site's management system and permit. The site supervisor / manager is if the waste quantity exceeds the allowable limits, allowing for timely corrective actions. The system ensures compliance with permit conditions by managing waste volumes within safe, regulated thresholds.
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		5. Waste time on site monitoring The system also monitors the length of time that waste has been stored on-site, broken down by LoW code. Reports are generated to compare the time each waste batch has been on-site against the time limits established in the permit and waste management system. If any waste exceeds the time limit for storage, the system generates an alert for further action, such as treatment, removal, or disposal. 6. Accessible and customisable reports Reports are accessible through the system and can be configured based on specific waste categories, LoW codes, and time frames. Regular audits ensure that reports reflect accurate, up-to-date data for compliance checks.
4	<i>The electronic (or equivalent) system must also be able to report the total quantity of end-of-waste materials on site at any one time, and where that material is located based on the site plan.</i>	Please see 3.4.1
5	<i>You must store back-up copies of records off site. These records must be readily accessible in an emergency.</i>	Please see 3.4.1

6 <i>You must keep acceptance records for a minimum of 2 years after you have treated the waste or removed it off site. You may have to keep records for longer if they are required for other purposes, for example hazardous waste consignment notes.</i>	In compliance with regulatory requirements, the site maintains records of all waste accepted on-site. These records are crucial for audit trails, compliance checks, and ensuring that waste treatment and disposal processes are accurately documented. The retention of these records is strictly managed as follows: 1. Retention period for acceptance records Acceptance records are kept for a minimum of 2 years after the waste has either been: • Treated on-site, or • Removed off-site (for recycling, disposal, or transfer). The records will be retained in both electronic and paper formats for easy access and long-term security. 2. Extended retention for hazardous waste Hazardous waste consignment notes are required to be kept for longer periods. In such cases, these records are retained for at least 3 years or longer if stipulated by other compliance frameworks. 3. Secure and accessible storage All acceptance records, including Waste Transfer Notes (WTNs), pre-acceptance documentation, and consignment notes, are stored in a way that ensures the integrity, confidentiality, and availability of the records for inspection or audits.
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	A document index is kept on site which is regularly reviewed to ensure that any records that are approaching the end of their required retention period, is reviewed or destroyed when applicable. 4. Record review and disposal Records that have exceeded the minimum retention period are reviewed for continued relevance. If they are no longer required for operational, audit, or regulatory purposes, they are securely disposed of or deleted according to the site's data retention policy. Hazardous waste consignment notes or other specific records are disposed of according to relevant environmental protection and data protection standards. 5. Audits and inspections All records are available for inspection during internal audits or external regulatory inspections. The system ensures that acceptance records can be quickly retrieved for review. Enva are committed to maintaining transparency and accountability in all aspects of waste management, including the retention of all acceptance and treatment records.
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3.3 Waste storage (sections 4.1 to 4.8, sections 4.11 and 4.13 and sections 4.1.1 and 4.1.2)

Ref	Appropriate Measure	Implementation
1	<i>You must have waste storage and handling procedures. You must store and handle waste in a way that makes sure you prevent and minimise pollution risks by using appropriate measures.</i>	To comply with regulatory requirements and minimise the risk of pollution, the site implements structured procedures for the safe storage and handling of all waste types received, processed, or transferred. 1. Pollution prevention All waste storage and handling activities are designed to prevent and minimise pollution risks by employing the following measures: Containment systems such as storage bays and/or impermeable pads with appropriate drainage controls. Regular maintenance and inspection of storage infrastructure to detect signs of deterioration, leakage, or damage. Use of secondary containment for liquid wastes and polluting substances. 2. Segregation and identification Wastes are clearly segregated according to treatment/compliance status. Each storage area is clearly marked, with labels or signage identifying the type of waste (compliant/non-compliant).

	3. Spill and incident controls All staff are trained to follow spill response procedures, and spill kits are available at key handling points. Procedures are in place for immediate containment and cleanup of any accidental spillage or leakage. Fugitive emission risks are mitigated by storing volatile or dusty materials in closed containers. 4. Handling procedures Waste is handled using suitable plant and equipment (e.g. loaders, mixer wagon, conveyors) that minimise manual contact and reduce risk of damage or emissions. Waste handling is supervised by trained staff, who verify that waste is being moved safely and without cross-contamination. Waste is never tipped or stored directly onto bare ground or unsealed surfaces. 5. Storage duration monitoring All stored waste is tracked using a system which records: • Date of arrival • Location • Type and quantity
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		• Maximum permitted storage duration Waste is rotated and removed within permitted timeframes to avoid build-up and degradation. 6. Capacity and compatibility controls • Waste is only accepted and stored if sufficient capacity is available and confirmed in advance. • Waste is only stored with compatible materials to prevent reactions, heating, or emissions. • Incompatible or reactive materials are stored with minimum separation distances and in designated units. 7. Training and supervision • All relevant personnel receive training in proper waste storage and handling procedures. • Supervision is carried out during unloading and loading to ensure compliance with procedures and detect non-conforming waste at the earliest point.
2	<i>You must store waste in locations that minimise the unnecessary handling of waste.</i>	To reduce the risk of pollution, physical damage to site infrastructure and equipment and occupational hazards, waste at the site is stored in locations that

minimise unnecessary handling and movement. The following measures are implemented:

1. Strategic waste storage layout

Waste storage areas are strategically positioned as close as practicable to the relevant treatment, processing, or dispatch points.

The layout of the site is designed to enable direct transfer routes between reception, storage, and treatment areas, reducing the need for double handling.

2. Direct placement on arrival

Wherever possible, waste is unloaded directly into its designated storage area upon arrival to avoid temporary or interim storage.

3. Defined movement routes

Internal waste transport routes are clearly marked and kept short to reduce movement times and distances.

Mechanical handling systems (e.g., loading shovels) are used to reduce the number of transfers needed between storage and treatment stages.

4. Staff training and oversight

Staff are trained in waste handling efficiency and instructed to avoid unnecessary movements that could increase risk of spills, emissions, or contamination.

		All waste movements are supervised and recorded to ensure they are purposeful and compliant with storage protocols. 5. Waste tracking integration The site's waste tracking system records the location and intended route of each waste stream, helping to plan efficient movement and minimise handling.
3	<i>Waste handling must be carried out by competent staff using appropriate equipment. You must use mechanical unloading technologies where it is possible, safe and practicable to do so.</i>	To ensure the safe, efficient, and environmentally responsible handling of waste materials, all waste handling activities on site are conducted by trained and competent personnel, using appropriate and well-maintained equipment. 1. Trained and competent staff Waste handling tasks are only undertaken by staff who have received training in: • Waste classification and identification • Safe equipment use • Emergency procedures and spill response • Site-specific handling protocols Refresher training is provided periodically and documented within the site's training matrix. 2. Use of appropriate equipment Mechanical handling systems (e.g. loading shovels, teleporters, conveyors) are used for unloading and internal transfer wherever possible, safe, and practicable.

		All handling equipment is: • Suited to the type of waste and its physical state i.e., cake, sludge. • Maintained and inspected regularly under a planned maintenance schedule • Fitted with any necessary safety features (e.g. spill guards, enclosed cabs, dust suppression) 3. Pollution and safety control Mechanical handling reduces manual handling risks and minimises spillage, emissions, and cross-contamination. • Handling operations are supervised by competent persons to ensure: • Waste is moved directly to its appropriate storage or treatment area • No damage occurs to infrastructure or containers • Any deviations or equipment faults are immediately reported 4. Continuous improvement Staff feedback and incident reports are used to identify potential improvements in handling methods. Where mechanical handling is not yet in use, the site continually assesses whether it can be safely introduced or expanded.
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4	<i>Where possible, you should locate storage areas away from watercourses and sensitive perimeters, for example those close to public rights of way, housing or schools. You must store all waste within the security protected area of your facility to prevent unauthorised access and vandalism.</i>	To minimise environmental and security risks, waste delivered to site is stored in designated, secure areas, with careful consideration given to proximity to sensitive receptors and the prevention of unauthorised access. 1. Strategic placement of waste storage Wherever possible, waste storage areas are located: • Away from watercourses, drainage systems, and flood-prone zones to reduce the risk of pollution. • At a safe distance from sensitive perimeters, such as public rights of way, residential areas, schools, and community sites. A site layout plan is maintained and regularly reviewed to ensure sensitive boundary risks are considered in any storage area changes or expansions. 2. Security-protected storage All waste is stored within the security-controlled zone of the site, protected by: • Perimeter fencing and lockable gates • Controlled entry points with monitored access • Access to waste storage areas is restricted to authorised personnel only.
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		3. Prevention of unauthorised access and vandalism Storage areas are inspected regularly to detect signs of tampering, damage, or attempted unauthorised access. Security measures are reviewed annually or following any incident to ensure ongoing suitability. Temporary or mobile storage (e.g. skips or roll-on-roll-off containers) are positioned in secure, visible areas and locked when not in use.
5	<i>You must clearly document in your management system the maximum storage capacity of your facility and its designated storage areas. You must regularly monitor the quantity of stored waste against the allowed maximum capacities, and not exceed them. You must define capacity in terms of, for example:</i> <i>cubic metres or tonnage</i> <i>numbers of skips or other containers</i> <i>maximum tank or vessel capacities</i>	Please see 3.2.3
6	<i>You should clearly mark all waste storage areas and provide signs indicating the type of waste stored there.</i>	Please see 3.2.3
7	<i>You must not accumulate wastes. You must treat wastes or remove them from the site as soon as possible. You must prioritise the treatment or off-site transfer of waste based on:</i>	To ensure compliance with permit conditions and minimise pollution risks, the site does not allow the accumulation of waste. Waste is treated or transferred

- *its type*
- *its age on arrival*
- *the date of arrival*
- *the duration of storage on site*

off site as soon as practicably possible, following a structured prioritisation system.

1. No waste accumulation policy

Waste is actively managed to prevent build-up, backlog, or storage beyond allowable timeframes.

The electronic waste tracking system is used to monitor:

- Volume of waste on site
- Age and arrival date of each load
- Storage duration by waste type and location

2. Prioritisation criteria

Waste is prioritised for treatment or removal based on the following factors:

Priority Factor	Description
Type of waste	Malodorous wastes are prioritised first.
Age on arrival	Older waste is processed ahead of newly arrived waste to prevent over-storage.
Date of arrival	The system flags loads based on first-in, first-out handling logic.
Storage duration	Any waste approaching time limits set in the permit or management system is escalated for urgent action.

		3. Tracking and escalation The site's waste inventory system automatically flags waste streams nearing or exceeding their permitted retention periods. Flagged loads are escalated for immediate treatment scheduling or removal planning. Justifications for any temporary delays are documented and authorised by the Site Manager. 4. Treatment and off-site transfer Treatment and transport schedules are reviewed daily to ensure continual movement of waste. Waste collection contractors are booked in advance through a pre-booking system linked to storage capacity and waste age data.
8	<i>Except for inert waste, you must follow the first-in-first-out principle, unless you need to prioritise more recently received wastes because they pose a higher risk of pollution.</i>	Please see above.
11	<i>You must thoroughly clean storage bays and containers on a regular basis to prevent the build-up of aging waste, which will be a source of odour and attract vermin.</i>	Purpose To prevent the build-up of aging waste that can cause odour and attract vermin, by ensuring the regular and effective cleaning of all waste storage areas at the site.

		Scope This procedure applies to all storage areas, skips, containers, and any infrastructure, e.g., shovel buckets, used for temporary waste holding across the site. Responsibilities Site Manager: Ensure cleaning schedule is in place and inspections are conducted. Monitor effectiveness and update procedures as needed. Operatives: Carry out cleaning in line with the schedule and report any issues. Procedure 1. Cleaning frequency Storage areas: Minimum once per week, or more frequently if visual inspections indicate waste build-up, odour, or vermin activity. Skips and containers: Clean before reuse, especially or after storing odorous materials. 2. Cleaning method Remove residual waste using shovels or mechanical sweepers. Wash down surfaces using a pressure washer or approved equipment. Collect and contain all washings to prevent runoff; dispose of them in accordance with the site's drainage and pollution control procedure.
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		Use appropriate PPE and comply with COSHH requirements for any cleaning agents used. 3. Inspection and record keeping Record each cleaning activity in the Site Logbook or electronic system. Include date, area cleaned, name of staff, and any issues found (e.g., damage, signs of infestation). Report and escalate any significant hygiene issues to the Site Manager immediately. 4. Vermin control Following cleaning, check for signs of vermin activity. Coordinate with the site's pest control contractor if evidence is found. No food or rapidly biodegradable waste stored in open or unlined containers.
12	<i>All waste containers must be fit for purpose, that is:</i>	Any waste containers used are regularly assessed for the operational condition.

	• <i>in sound condition</i> • <i>not corroded, if metal</i> • <i>have well-fitting lids</i> • <i>suitable for the contents</i> • <i>with caps, valves and bungs in place and secure</i> • <i>within the manufacturer's designed lifespan, particularly for plastic containers</i>	
13	<i>You must inspect storage areas, containers and infrastructure regularly to make sure there is no loss of containment. You must deal with any issues immediately. You must keep written records of the inspections. You must clean up and log any spillages of waste.</i>	This procedure ensures the regular inspection of waste storage areas, containers, and infrastructure to prevent the loss of containment and address any issues immediately. It also details the process for spill management and logging of incidents. 1. Regular inspections All storage areas, containers, and waste management infrastructure are to be inspected regularly to ensure they are in good condition and secure. Inspections are carried out weekly, with more frequent checks for high-risk areas (e.g., biosolids waste storage). Inspections include: • Physical condition of containers and infrastructure (no visible cracks, leaks, or signs of damage).

	• Spill containment systems (check for effectiveness of bunds, trays, and liners). • General waste storage areas for signs of unauthorised waste accumulation or spillage. • Waste handling equipment to ensure proper functioning. 2. Immediate action for identified issues Any issues identified during inspections, such as leaks, damage, or waste overflow, are addressed immediately to prevent further risks: Spills are cleaned up promptly, and affected areas are isolated to prevent contamination. Damaged containers or infrastructure are either repaired or replaced. Any identified risks to environmental protection are prioritised for swift resolution. 3. Inspection records A written record of each inspection is maintained, including: • Date and time of inspection • Inspected areas and equipment • Any issues identified • Corrective actions taken
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		- Names of staff who conducted the inspection - Inspection records are stored electronically or in a physical log and are retained for a minimum of two years. 4. Spill management In the event of a spillage of waste, the following actions are taken: - Contain the spill immediately using spill kits or containment barriers. - Assess the severity of the spill and take further action based on its potential impact (e.g., environmental, safety). - Clean up the spill thoroughly using appropriate methods for the type of waste. Log the incident in the site's incident tracking system, detailing: - The nature and extent of the spill - Actions taken to mitigate the impact - Any waste affected by the spill - Root cause analysis, if applicable, and corrective actions to prevent recurrence.
4.1	<i>Segregation</i>	
1	<i>You should keep different types of waste segregated if contamination would inhibit the recovery of the waste.</i>	This procedure ensures that waste is properly segregated to prevent contamination that would inhibit the recovery or recycling of materials, thus

	enhancing operational efficiency and compliance with environmental regulations. 1. Segregation of waste types The waste types are segregated based on their compliance with the Safe Sludge Matrix, in that material is either compliant or non-compliant. Only compliant biosolids can be spread to land. Composition, hazardous characteristics, and treatment or recycling requirements. Segregation is required to prevent contamination of different waste streams that could render them non-recoverable or unsafe for treatment or recycling. Biosolids can supply a large part of the nitrogen or phosphorus that crops require along with a source of organic matter that improves soils. Treated sludge contains fewer pathogens and is less fermentable. The treatment processes also change how sludge releases nitrogen. 2. Identification of waste streams Each waste stream is clearly identified with appropriate labels, signs, or color-coded containers to differentiate them from other materials. Containers must be designated for specific waste types (e.g., hazardous waste, non-hazardous, recyclables, etc.) and marked clearly.
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	3. Handling and storage Waste should be handled and stored separately if there is a risk that contamination would affect the recovery process. For example: Hazardous waste must be segregated from non-hazardous waste to prevent cross-contamination. Food waste should be separated from industrial waste to ensure it does not disrupt recycling or composting processes. Non-recyclable materials should be stored separately from recyclables to ensure proper waste diversion and recovery rates. 4. Procedures for segregation Waste is segregated as early in the process as possible to ensure minimal contamination. Clear procedures are in place for: Collection of waste: ensuring each waste type is collected in the appropriate container. Transportation: when moving waste, maintain segregation to avoid cross-contamination. Storage: ensure that segregated waste types are stored in areas designed for their specific treatment or recycling.
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		5. Training and awareness Staff are trained regularly on the importance of waste segregation and the potential risks posed by improper mixing or contamination. All operatives involved in waste handling understand the need to separate wastes and the consequences of failing to do so (e.g., loss of recyclability, contamination, regulatory non-compliance). 6. Regular monitoring Regular audits and inspections of waste storage and handling areas are undertaken. Documentation is maintained for segregated waste streams, and a tracking system in place to monitor the movement of segregated waste. 7. Record-keeping All waste segregation activities are recorded, including: Waste type identification and segregation efforts. Storage location of segregated waste. Any issues related to improper segregation, including corrective actions taken.
2	<i>Where paper, plastic, metal or glass have been collected separately, they must not be mixed with other waste or material. This duty applies where you are required to keep wastes separate and to help with or improve waste recovery.</i>	Where waste streams are collected separately, they remain separate to prevent any cross contamination.

3.4 Emissions Control (section 6 intro and sections 6.3.1 to 6.3.16 and sections 6.4, 6.5 and 6.6)

Ref	Emissions control appropriate measure	Implementation
1	<i>You must identify, characterise and control emissions from your activities that may cause pollution.</i>	Enva recognise all sources of potential emissions, including (but not limited to): • Dust from treating waste (lime) • Odour from the treatment process • Leachate or run-off from storage areas • Noise from plant and vehicle movements The nature of each emission is understood, i.e., what it consists of, how often it occurs, and how it could affect: • Air quality • Water bodies or drains • Any nearby residents or businesses For example, dust may contain fine particles that irritate breathing, or a leachate spill may contain harmful contaminants. Controls and mitigation measures are in place to prevent or reduce pollution, including (but not limited to):

		• Installing water sprays or windbreaks for dust • Using covered skips or enclosed buildings for odorous waste • Ensuring proper drainage and impermeable surfaces • Regular inspections and maintenance of plant and infrastructure • Having emergency procedures for spillages or fires
6.3	<i>Fugitive emissions to air</i>	
1	<i>You must use appropriate measures to prevent and minimise fugitive emissions to air, including dust, mud and litter, odour and noise and vibration.</i>	EMS and Environmental Risk Assessment in place at the site.
2	<i>You must use your waste pre-acceptance, waste acceptance and site inspection checks and procedures to identify and manage wastes that could cause, or are causing, fugitive emissions to air. When you identify any such wastes you must: take appropriate risk-assessed measures to prevent and control emissions prioritise their treatment or transfer</i> <i>Where necessary to prevent fugitive emissions to air from the storage or handling of wastes, you should use a combination of the following measures: use fully enclosed material transfer and storage systems and equipment outside buildings, for example conveyors, hoppers, containers, tanks and skips store and handle the waste within a suitably enclosed area (for example bays), a building or enclosed building</i>	This procedure describes how Enva identifies, assesses, and manages fugitive emissions to air resulting from the acceptance, storage, handling, and processing of waste materials on site. It aims to prevent pollution and ensure compliance with environmental permit conditions. Scope This procedure applies to all operational areas of the site where waste is received, handled, stored, or treated and where fugitive emissions to air (such as dust, vapours, or odours) may arise. Responsibilities <i>Site Manager</i> Responsible for ensuring all control measures are in place and staff are trained.

<i>keep doors closed except when access is required</i> <i>keep enclosed buildings and equipment under adequate negative pressure with an appropriate abated air circulation or extraction system, locating air extraction points close to potential emission sources</i> <i>use fast-acting or 'airlock' doors that default to closed</i>	Carries out emission risk assessments, inspections, and initiates corrective actions. <i>Site operatives</i> Must remain alert to potential emissions during waste activities and report issues promptly. Procedure <i>Identifying high-risk wastes</i> Use pre-acceptance and waste acceptance checks to identify wastes that may cause excessive fugitive emissions. Inspect waste upon arrival and unloading for signs of excessive odour. Document any concerns in the site log and initiate immediate containment if necessary. <i>Managing identified risks</i> Where a waste poses or causes a fugitive emission risk: • Take risk-assessed control measures immediately. • Prioritise treatment or off-site transfer to minimise time on site. Apply suppression techniques such as:
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- Dust suppression sprays or misting
- Covering waste

Emission control

Liming increases pH (>11.5), which can increase short-term ammonia volatilisation.

Therefore control relies on:

- Rapid and uniform mixing
- Avoidance of prolonged exposed untreated sludge
- Process sequencing to minimise untreated surface area
- Operational timing relative to meteorology
- Separation distances to sensitive receptors

For the open biosolids liming operation, the baseline emission control infrastructure include:

- Impermeable, kerbed hardstanding
- Sealed drainage with contained collection
- Covered lime storage (silo or sheeted clamp)
- Dust suppression capability
- Defined operational area with stockpile management
- Meteorological operating controls

		• Spill and runoff contingency arrangements <i>Inspection, logging and review</i> Inspect emission-prone areas at least weekly or after high-risk waste handling. Log all incidents of fugitive emissions and detail control actions taken. Keep a register of high-risk wastes and update it regularly. Review the procedure and site layout quarterly to ensure adequacy of controls. <i>Records and documentation</i> The following records must be maintained for a minimum of two years: • Pre-acceptance and acceptance checks identifying fugitive emission risks • Site inspection logs • Incident reports and control actions • Maintenance records for enclosed systems and extraction equipment (where applicable)
3	<i>You must have an appropriate, regular maintenance programme covering all buildings, plant and equipment. It must help prevent emissions or minimise them.</i> <i>Your maintenance programme must include:</i>	Please see the site's EMS.

	<i>a leak detection and repair programme to promptly identify and mitigate any fugitive emissions of organic compounds from treatment plant and associated infrastructure (for example, pipework, conveyors or tanks)</i> <i>regular inspection and cleaning of all waste storage and treatment areas and equipment (including conveyor belts) to avoid large scale contamination activities</i> <i>preventing plant and equipment from corroding (for example, conveyors or pipes) – including selecting and using appropriate construction materials, and lining or coating equipment with corrosion inhibitors</i>	
4	<i>You should monitor and log weather conditions – temperature, wind speed and direction, and describe any precipitation (for example none, drizzle, heavy rain, snow). You can use this information to identify when dispersion conditions are poor (that is, periods of warm, calm weather with wind blowing towards sensitive receptors). You can also use it to inform decisions to implement additional short-term pollution control contingency measures. If you have a weather station you should position it carefully, for example not placing it in between buildings. There is guidance in the World Meteorological Organization's Guide to Meteorological Instruments and Methods of Observation.</i>	Pollution control hierarchy and role of dispersion Enva acknowledges and fully supports the principle that preventing and reducing pollution at source must always take priority over reliance on dispersion or favourable meteorological conditions. In line with this, the site's pollution control measures follow the established hierarchy: <u>Prevention at source</u> – Prioritisation of operational controls, process modifications, and infrastructure (e.g., sealed drainage, dust suppression systems) to prevent the release of pollutants in the first instance.

5	<i>Relying on dispersion and wind direction to minimise pollution at sensitive receptors must be a last resort and you must not use it instead of measures that prevent and reduce pollution at source.</i>	<u>Reduction measures</u> – Where emissions cannot be entirely prevented, the site implements techniques to reduce their magnitude and impact (e.g., water misting, bunding, odour-neutralising sprays, and segregation of high-risk materials). <u>Monitoring and early intervention</u> – The site maintains routine environmental monitoring (visual, olfactory, and instrumental where applicable) and staff training to ensure early detection and response to any emissions. <u>Dispersion as a last resort</u> – Enva recognise that meteorological dispersion and wind direction are passive environmental factors that may help reduce exposure at receptors. However, they are not relied upon as a substitute for engineered or procedural controls. Any reference to dispersion is strictly supplementary and only considered when all practicable source-control measures have been implemented. This approach aligns with the EA position and the Appropriate Measures (AM) framework. The site's EMS, AMP and Environmental Risk Assessment all reflect this hierarchy of controls, and they are routinely reviewed to ensure continued compliance and best practice.
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6	<i>If your activities are likely to produce dust and particulates, mud or litter that could cause pollution at sensitive receptors, or if such pollution has been substantiated, you must implement and regularly review a dust, mud and litter management plan. You must do this following our guidance. Your dust, mud and litter management plan must explain how you will prevent and minimise emissions of dust, mud and litter from your facility.</i>	The site has an EMS and an Environmental Risk Assessment.
7	<i>Measures such as litter fencing and micro-netting should be located as close as possible to areas where you load and unload light-weight loose waste, if this activity is done outdoors. You should not rely on fences and screens at the perimeter of your facility to stop litter escaping.</i>	Waste processing is carried out in a sheltered location; any litter is picked at the end of each day.
8	<i>Measures such as mist sprays should be located as close as possible to point source emissions of dust, for example at conveyors, trommels, shredders, and at building entrances – except where this would increase odour from biodegradable waste.</i> <i>If measures such as using hoses and road sweepers do not prevent mud escaping onto the public highway, you must take further measures and you must consider installing a high-pressure wheel wash. Regardless of the measures you use, you must make sure that you minimise water consumption, and that contaminated water does not escape from your facility, unless you can lawfully discharge it.</i>	Not applicable.

Other measures for odour		
9	<i>If your activities are likely to produce odour pollution at sensitive receptors, or such pollution has been substantiated, you must implement and regularly review an odour management plan following our guidance, which includes H4 Odour management. Your odour management plan must explain how you will prevent and minimise odorous emissions from your facility.</i>	Where activities are likely to produce odour pollution at sensitive receptors, or such pollution has been substantiated, Enva have implemented and regularly review an EMS and an Environmental Risk Assessment which addresses the management and mitigation of potential odour emissions.
10	<i>You must reject waste that is highly odorous as part of your pre-acceptance and waste acceptance procedures. This is unless you can handle and treat these wastes within an enclosed building with appropriate odour control measures, including extraction via odour abatement. Otherwise, you should talk to the waste supplier to stop it happening again. You should avoid receiving aged waste, for example by refusing to accept waste from other transfer stations that do not have strict inventory controls and documented holding times.</i>	
11	<i>You must make sure that odorous waste arrives at and leaves your facility in covered or enclosed vehicles. Mesh covers are not adequate to control odour. You should minimise how long potentially odorous waste is kept at your facility, in particular under anaerobic conditions. Making smaller stockpiles increases natural aeration, reducing the risk of anaerobic biodegradation which can cause odour.</i>	

12	<i>You should wash empty vehicles before they leave your facility, to remove any residues which may be or become odorous. You must make sure the run-off from this process is contained and lawfully discharged.</i>	
13	<i>You should not allow contaminated liquids to pool for long periods of time, as they can be a source of odour. If you do not have a drainage system inside the building that can collect the leachate or dirty water, then you will need other appropriate measures. You should take action to avoid ponding or pooling. Industrial vacuum cleaners can be used to suck up liquids. You should clean any spillages immediately.</i>	
14	<i>You must cover odorous or potentially odorous waters or liquids or keep them in enclosed tanks or containers.</i>	
15	<i>Using masking agents (for example dry nano systems, ozone systems and ionisation systems) is a way of attempting to disguise an odour problem. If you understand and process wastes efficiently then you will not need to use masking agents. We do not consider this technology an appropriate measure.</i>	
Other measures for noise and vibration		
16	<i>If your activities are likely to produce noise or vibration pollution at sensitive receptors, or such pollution has been substantiated, you must implement and regularly review a noise and vibration management plan. Follow our guidance H3</i>	Where activities are likely to produce noise and/or vibration pollution at sensitive receptors, or such pollution has been substantiated, Enva have implemented and regularly review the Environmental Management System.

	<i>part 2 noise assessment and control. Your noise and vibration management plan must explain how you will prevent and minimise emissions of noise and vibration from your facility.</i>	
6.4	Point source emission to water (including sewer)	
1	<i>You must identify the main chemical constituents of your facility's point source emissions to water and sewer as part of your inventory of emissions.</i>	Not applicable.
2	<i>You must assess the fate and impact of the substances emitted to water and sewer following the Environment Agency's risk assessment guidance.</i>	The site has an Environmental Risk Assessment in place.
3	<i>Discharges to water or sewer must comply with the conditions of an environmental permit and a trade effluent consent.</i>	
4	<i>Relevant sources of waste water include:</i> <i>runoff from all waste storage and handling areas, including loading and unloading areas</i> <i>process water</i> <i>condensate collected from treatment process</i> <i>waste compactor runoff</i> <i>vehicle washing</i> <i>washing of containers and vessels</i> <i>soil washing effluent</i>	

	• <i>vehicle oil and fuel leaks</i> • <i>spills and leaks</i> • <i>rainwater from bunds around containers and tanks</i> <i>If you need to treat wastewater before discharge or disposal, you must use appropriate treatment techniques. An appropriate combination of treatment techniques, for example, could include silt or solids removal and using an oil separator to manage site drainage.</i>	
5	<i>You must segregate uncontaminated water streams (for example clean runoff from roofs) from those that require treatment.</i>	
6	<i>You must separate contaminated water streams based on pollutant content and treatment required. For example, you may need to collect and treat separately contaminated surface runoff water and process water.</i>	
6.5	<i>Fugitive emissions to land and water</i>	
1	<i>You must use appropriate measures to control potential fugitive emissions and make sure that they do not cause pollution. See the guidance on emissions to water and leaks from containers.</i>	Control of fugitive emissions, surfacing, containment and spill management Enva is committed to implementing and maintaining all appropriate measures to prevent fugitive emissions and protect surface water, groundwater, and land in line with the permit conditions and current Environment Agency guidance. 1. Control of fugitive emissions
2	<i>You must design appropriate surfacing and containment or drainage facilities for all operational areas, taking into account:</i> • <i>collection capacities</i>	

	<i>surface thicknesses</i> <i>strength and reinforcement</i> <i>falls</i> <i>materials of construction</i> <i>permeability</i> <i>resistance to chemical attack</i> <i>inspection and maintenance procedures</i> <i>relevant standards of construction</i> <i>end use, for example by tracked or wheeled vehicles or vehicle weight</i>	Enva have identified all potential sources of fugitive emissions (dust, odour, leachate, and wastewater) and have implemented the following source control measures: Waste is handled and stored on impermeable surfaces with contained drainage, compliant with CIRIA 736. Operational activities are carried out in areas equipped with sealed surfacing, defined traffic management, and physical containment. Regular housekeeping, material segregation, and pre-acceptance checks prevent cross-contamination and reduce emission risks.
3	<i>Your drainage infrastructure must:</i> <i>prevent incompatible wastes coming into contact with each other</i> <i>make sure that fire cannot spread</i>	Fugitive emissions are not managed through reliance on dispersion. Preventative controls are the primary means of pollution mitigation. 2. Surfacing, drainage and containment infrastructure
4	<i>You must store and treat all waste on an impermeable surface with contained drainage that meets CIRIA 736 or an equivalent approved standard. The impermeable surfaces must have sealed construction joints. These requirements do not apply in designated areas where the waste being stored or handled does not pose any significant risk of contaminating surface water or ground water. You must appropriately isolate these designated areas from other operational areas so that</i>	All operational surfaces on site have been designed and constructed with the following standards and considerations: Material selection and design accounts for chemical resistance, load-bearing requirements (tracked/wheeled vehicles), and structural integrity. Surfaces are engineered with appropriate falls and sealed joints to direct runoff into a contained drainage system, fully isolated from clean water drains.

	<i>there cannot be any flows between them. This includes in the event of an accident, for example a fire.</i>	Drainage infrastructure is designed to prevent mixing of incompatible substances and to mitigate fire spread through zonal isolation.
5	<i>You must provide bunds for all tanks containing liquids (whether waste or otherwise) that could be harmful to the environment if spilled. Bunds must meet CIRIA 736 or an equivalent approved standard and:</i> <i>be impermeable, stable and resistant to the stored materials</i> <i>have no outlet (that is, no drains or taps) and drain to a blind collection point</i> <i>have pipework routed within bunded areas with no penetration of contained surfaces</i> <i>be designed to catch leaks from tanks or fittings</i> <i>have an appropriate capacity</i> <i>have regular visual inspections – any contents must be pumped out or otherwise removed under manual control after checking for contamination</i> <i>be fitted with a high-level probe and an alarm (as appropriate) if not frequently inspected</i> <i>have tanker connection points within the bund (where possible), and if not possible you must provide adequate containment for spillages or leakage</i> <i>have programmed engineering inspections (extending to water testing if structural integrity is in doubt)</i>	Where applicable, designated low-risk areas are clearly delineated and physically separated to prevent cross-flow in the event of accidents. 3. Tanks and bunds All tanks storing potentially polluting liquids are: - Located on impermeable surfaces with contained drainage. - Subject to regular inspection (visual and engineering) and emptied of rainwater as part of the preventative maintenance programme. - All pipework remains within the bunded area without penetrating containment walls. 4. Subsurface infrastructure Subsurface structures have been identified, mapped, and, where practical, decommissioned or replaced with above-ground systems. Any retained subsurface pipes or sumps are inspected regularly, pressure testing, or leak detection, with secondary containment or alarmed systems in place. Maintenance records are kept demonstrating ongoing integrity. 5. Storage of mobile containers

	• <i>be emptied of rainwater regularly to maintain the containment capacity</i>	Drums and IBCs >200L stored outside are kept within secondary containment systems, in protected, bunded areas.
6	<i>All above-ground tanks containing liquids (whether waste or otherwise) that could be harmful to the environment if spilled must be kept on an impermeable surface with contained drainage that meets CIRIA 736 or an equivalent approved standard. You must fit the tanks with alarms and cut-out systems to detect and prevent leaks and spills.</i>	All container storage is sited away from surface water drains and unmade ground. 6. Wash water and cleaning controls Washdown activities are restricted to designated contained areas, draining either to sealed tanks for off-site disposal.
7	<i>You must minimise using subsurface equipment and infrastructure and decommission it where possible. For subsurface structures, you must:</i> • <i>establish and record the routing of all site drains and subsurface pipework</i> • <i>identify all subsurface sumps and storage vessels</i> • <i>engineer systems to minimise leakages from pipes and make sure they can be detected quickly if they do occur</i> • <i>provide secondary containment or leakage detection for subsurface pipework, sumps and storage vessels – vessels must be fitted with alarms and cut-out systems to detect and prevent spills when filling</i> <i>establish an inspection and maintenance programme for all subsurface structures, for example, pressure tests, leak tests, material thickness checks or CCTV</i>	Only biodegradable and non-corrosive cleaning products are used, and these are stored in bunded, secure areas. Mixing and preparation of solutions is done within bunded locations with no risk of runoff. 7. Wastewater buffer capacity and reuse On-site storage is provided for wastewater management during abnormal conditions. Storage capacity accounts for storm events, peak inputs, and emergency isolation.
8	<i>You must provide secondary containment that meets CIRIA 736, or an equivalent approved standard, for all drums and other mobile containers which:</i>	8. Spillage response plan The site has a comprehensive spillage response plan that includes:

	are greater than 200 litres in capacity and are kept outside contain liquids (waste or otherwise) that could be harmful to the environment if spilled	- Clearly marked spill kit locations near high-risk areas. - Staff training in immediate response and containment measures, including the use of sorbents, booms, and drain mats.
9	You must comply with the oil storage regulations. These apply to non-hazardous wastes such as vegetable and cooking oil, as well as to biofuels and mineral oils.	Protocols for containment, clean-up, and disposal of spillage waste, with appropriate PPE and manufacturer's safety data followed.
10	You must provide appropriate buffer storage capacity at your facility to store waste waters, taking into account: - potential abnormal operating scenarios and incidents - the nature of any polluting substances and their impact on the downstream waste water treatment plant and receiving environment You must have appropriate measures to monitor, treat and reuse the water held in the buffer storage before discharging.	- Routine drills and periodic reviews of the response plan are carried out. - All spill-related actions are documented and reported.
11	You must take appropriate measures to prevent emissions from washing and cleaning activities, including: - containing and directing spray, liquid effluent and wash-waters to foul sewer or collecting them in a sealed system for offsite disposal – you must not discharge them to surface or storm drains - where possible, using biodegradable and noncorrosive washing and cleaning products	9. Inspection and maintenance The site maintains a documented inspection and maintenance programme for: - Impermeable surfaces and sealed drainage systems. - Bunds, tanks, containment areas, and wash bays. - Subsurface and above-ground infrastructure, with frequency tailored to operational risk and exposure. - Records are maintained for all inspections, findings, and corrective actions.

	<i>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</i> <i>preparing cleaning or disinfection solutions in contained areas of the site and never in areas that drain to the surface water system or groundwater</i>	
12	<i>You must produce and implement a spillage response plan and train staff to follow it and test it.</i>	
13	<i>Your procedures and associated training must make sure you deal with spillages immediately. You should follow the manufacturer's health and safety advice for any products or substances involved.</i>	
14	<i>You must keep spill kits at locations close to areas where a spillage could occur and make sure relevant staff know how to use them. You must make sure kits are replenished after use.</i>	
15	<i>You must stop spillages from entering drains, channels, gullies, watercourses and unmade ground. You must make available proprietary sorbent materials, sand, booms or drain mats for use when required.</i>	
16	<i>You must make sure your spillage response plan includes information about how to recover, handle and correctly dispose of waste produced from a spillage.</i>	

17	<i>You must have a documented inspection and maintenance programme for impermeable surfaces and containment facilities and keep records to demonstrate its implementation.</i>	
6.6	Pests	
1	<i>You must manage waste in a way that prevents pests. For example, if you do not manage flies, rats and birds they can affect operations, be a nuisance to neighbours and pose an environmental and health hazard as a potential vector for pathogens.</i>	Enva recognises the risks posed by pests such as flies, rodents, birds, and other vermin in waste management operations. These risks include nuisance to local receptors, interference with operations, and potential transmission of pathogens. In line with regulatory expectations, robust pest management procedures are implemented. Should it be a required a formal Pest Management Plan, subject to regular review will be implemented.
2	<i>If you expect pests will cause pollution, hazard or annoyance at sensitive receptors, or if this has been substantiated, you must create, use and regularly review a pest management plan.</i>	
3	<i>Your pest management plan must include procedures for:</i> <i>inspecting for and controlling pests</i> <i>rejecting loads of infested waste</i> <i>treating pest infestations promptly, and removing waste if necessary</i> <i>storing, handling and using approved pest control products – you can get information on using chemicals at work from the Health and Safety Executive</i>	Pest Management Plan (PMP) The PMP will include the following core elements: <u>Regular site inspections</u> Scheduled inspections carried out by trained personnel to identify early signs of pest activity (e.g. nesting, droppings, swarms). Particular attention paid to waste storage areas, skips, external perimeters, drainage outlets and building eaves. <u>Waste rejection and handling controls</u>

Loads showing signs of pest infestation (e.g. live maggots, rodents, flystrike) rejected at the point of acceptance.

Waste with the potential to attract pests (e.g. organic materials) prioritised for quick processing or transfer and stored in covered or enclosed containers where appropriate.

Rapid response to infestation

Any signs of infestation trigger immediate investigation and treatment using approved methods and substances.

Waste may be relocated or removed from site to break breeding cycles if required.

The site engages with professional pest control contractors as necessary, particularly for rodent and bird control.

Use of pest control substances

Pest control products used on site will be:

		• Approved for industrial/commercial use • Stored in secure, bunded chemical storage units • Applied by trained and authorised personnel in accordance with the manufacturer's guidelines and COSHH risk assessments • Usage records are kept, and control measures follow the Health and Safety Executive's guidance on using chemicals at work. <u>Staff training and awareness</u> Staff are trained to: • Spot early signs of pest activity • Follow waste storage protocols that reduce attractants (e.g. avoiding exposed putrescible waste) • Report issues and implement mitigation measures promptly <u>Ongoing monitoring and review</u> The pest management plan is reviewed quarterly, or sooner if substantiated pest activity is reported or observed. Outcomes from pest contractor reports, incident logs, or complaints are used to improve site controls.
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3.5 Waste minimisation, recovery and disposal

Ref	Appropriate Measure - Waste minimisation, recovery and disposal	Implementation
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1	<i>You must have and implement a residues management plan that:</i> <i>minimises the generation of residues, that is solid waste arising from the treatment of waste</i> <i>optimises the reuse, regeneration, recycling or energy recovery of residues, including packaging</i> <i>makes sure you properly dispose of residues where recovery is technically or economically impractical</i>	Enva is committed to ensuring the proper segregation of waste types to prevent contamination that could inhibit the recovery or recycling of materials. This procedure outlines the steps for segregating waste to optimise recovery processes and ensure compliance with environmental regulations. Purpose The purpose of this procedure is to ensure that waste is segregated effectively on site to prevent contamination, support recycling efforts, and comply with environmental best practices. Proper waste segregation enhances recovery processes and minimises environmental impacts. Scope This procedure applies to all employees and contractors at Enva involved in the collection, handling, storage, and transportation of waste. It applies to all waste received, stored, or processed on-site, including hazardous and non-hazardous materials. Waste segregation guidelines <i>Hazardous waste:</i> Any hazardous waste (e.g., chemicals, batteries, fluorescent tubes) must be segregated from non-hazardous waste to prevent contamination. This waste must be clearly labelled and stored in designated secure areas.
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Recyclable waste: Materials such as paper, cardboard, plastics, and metals must be separated from general waste streams to maximise recovery and recycling.

Organic waste: Food or biodegradable waste must be kept separate from other waste streams to avoid contamination of recyclable or non-recyclable materials.

Construction and demolition waste: These materials must be segregated by type (e.g., wood, metal, concrete) to ensure efficient recycling or safe disposal.

Segregation procedures

Identification and labelling: Each waste stream must be identified with clear labels or colour-coded bins to ensure proper segregation. Each waste type must be immediately and correctly sorted at the point of generation.

Storage: Segregated waste must be stored in clearly marked containers, bins, or skips, dedicated to each specific waste type. Containers must be durable, secured, and compatible with the type of waste being stored.

Transportation: When waste is moved within the site or to an external processing or disposal facility, it must remain segregated and transported in the correct container.

Staff training

	All staff members involved in waste handling, sorting, and transportation must be trained on the importance of waste segregation and the specific procedures for each waste stream. Regular training updates are provided to reinforce waste segregation practices and ensure compliance with any new regulations. Inspection and monitoring Enva carry out regular inspections to ensure that waste is being segregated correctly. Inspections include: • Checking that containers are correctly labelled and securely stored. • Verifying that segregation procedures are being followed, especially in high-risk or high-volume waste areas. • Ensuring that any non-conforming waste is identified and rectified promptly. These inspections will be logged, and records will be kept for future reference. Handling and disposal of contaminated or non-conforming waste In the event that waste is incorrectly segregated or contamination is found: • The contaminated waste must be isolated. • The cause of the contamination must be identified, and corrective actions must be taken to prevent recurrence.
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- Any non-conforming waste will be either re-treated or removed from the site for proper disposal or treatment.

Detailed records of the issue and corrective action must be maintained for audit purposes.

Record keeping

Detailed records will be maintained for all segregated waste, including:

- Waste type and identification
- Storage location
- Handling procedures
- Inspections and corrective actions
- Staff training records

These records should be kept for a minimum of two years to ensure compliance and traceability.

Compliance and continuous improvement

Enva is committed to continuous improvement in waste segregation practices.

This procedure will be regularly reviewed and updated to ensure it aligns with the latest regulations and best practices.

Enva will also aim to increase the recovery rate of segregated waste and improve operational efficiency.

2 <i>Where you must dispose of waste, you must carry out a detailed assessment identifying the best environmental options for waste disposal.</i> <i>You must review on a regular basis options for recovering and disposing of waste produced at the facility. You must do this as part of your management system to make sure that you are still using the best environmental options and promoting the recovery of waste where technically and economically viable.</i>	Waste disposal assessment Where waste must be disposed of, Enva will carry out a detailed assessment to identify the best environmental disposal options. This includes: • Reviewing the waste type and determining the most suitable disposal method (e.g., landfill, incineration, or recycling). • Considering environmental impact, cost-effectiveness, and regulatory compliance in the decision-making process. Disposal decisions will be reviewed regularly as part of the site's management system to ensure that the best environmental options are being used, and to promote waste recovery wherever technically and economically viable. Options for recovery, treatment, or recycling will be prioritised wherever possible, with the aim of minimising landfill disposal and maximising recycling. Record keeping Detailed records must be maintained for all segregated waste, including: Waste type and identification • Storage location • Handling procedures • Inspections and corrective actions • Staff training records
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- Assessment of disposal options

These records will be kept for a minimum of two years to ensure compliance and traceability.

Compliance and continuous improvement

Envia is committed to continuous improvement in waste segregation practices and disposal options. This procedure will be regularly reviewed and updated to ensure it aligns with the latest regulations and best practices.

Envia will also aim to increase the recovery rate of segregated waste, improve operational efficiency, and minimise environmental impact through responsible waste disposal practices.