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O'Donovan Waste Disposal Alperton Environmental Permit Application

Application Reference Number: EPR/ LP3037WG

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Non-Technical Summary

The operator is applying to increase the total annual throughput of the site and add additional waste codes to the permit, some of which were left off the original permit application in error, and some to allow for the small-scale storage and bulking up of hazardous wastes prior to transfer to other sites for recovery or disposal.

The proposed changes do not change the fundamental operational philosophy of the site. Acceptance, storage and treatment of waste will operate in the same way. Additional storage facilities will be made available for the new, low volume waste streams in a storage building separate from the main waste treatment facility. There will be no change to the types of raw materials used or energy use per tonne of waste processed; energy use is tracked as part of the EMS.

The existing fire prevention plan and dust management plan have been reviewed and updated to take account of the new waste streams. An Odour Management Plan has also been prepared in line with best practise, although no existing or proposed waste streams present an increased risk of odour.

There is no proposed change to existing monitoring procedures at the site, including ongoing dust monitoring and routine site inspections as part of the EMS.

The impact of the changes to the installation has been summarised in the updated Environmental Risk Assessment in Appendix H. It is concluded that the proposed changes to the installation will be managed sufficiently so as to present a low ongoing risk to the environment.

1. What activities are you applying to vary?

Table 1a Types of Activities

Schedule 1 listed activities						
Installation Name	**Schedule 1 References**	**Description of the activity**	**Activity daily capacity**	**Annex IIA or IIB (disposal and recovery) codes**	**Hazardous waste treatment capacity**	**Non-hazardous waste treatment capacity**
Alperton Lane Waste Transfer Station	5.4 A(1)(a)(ii)	D9 Physico-chemical treatment not specified elsewhere which results in final compounds or mixtures which are discarded by the means of operation D1 to D8, D10 or D12	800 treatment	D9, D15 R3, R4, R5, R13	50 – storage only, no treatment	800

Directly associated activities (See note 4)		
Name of DAA	Description of the DAA (please identify the schedule 1 activity it serves)	
A2 Storage of non-haz waste	D15 Storage of waste pending any operations D1 to D14	
A3 Surface Water Discharge to Sewer	Storage and discharge of contaminated surface water to sewer via interceptor	
A4 Fuel Storage	Storage of fuel for use in vehicles on-site	
A5 Recovery Operations	R13 storage of waste pending operations R1 to R12; R3 recycling/reclamation of organic substances which are not solvents; R4 recycling/reclamation of metals and metal compounds; R5 recycling/reclamation of other inorganics compounds	
For installations that take waste	**Total storage capacity**	410
	New Total if varying to increase	1250 – total storage capacity at any one time (more waste can be stored on site than is treated each day)
	Annual throughput (tonnes each year)	150,000
	New Total if varying to increase	300,000

1b. About the Proposed Changes

The operator is applying to increase the total annual throughput of the site and add additional waste codes to the permit, some of which were left off the original permit application in error, and some to allow for the small-scale storage and bulking up of hazardous wastes prior to transfer to other sites for recovery or disposal.

The operator proposes to increase the annual throughput of the site from 150,000 tonnes per year to 300,000 tonnes per year.

The following waste codes are proposed to be added. Codes in bold are not part of the current S1 and S2 exemptions:

Table 1b Waste Codes to be Added

Waste code	Waste description
08	**WASTES FROM THE MANUFACTURE, FORMULATION, SUPPLY AND USE (MFSU) OF COATINGS (PAINTS, VARNISHES AND VITREOUS ENAMELS), ADHESIVES, SEALANTS AND PRINTING INKS**
08 01 11*	waste paint and varnish containing organic solvents or other dangerous substances
08 01 12	waste paint and varnish other than those mentioned in 08 01 11
08 04 09*	waste adhesives and sealants containing organic solvents or other dangerous substances
08 04 10	waste adhesives and sealants other than those mentioned in 08 04 09
08 05 01*	waste isocyanates
13	**OIL WASTES AND WASTES OF LIQUID FUELS**
13 01 09*	mineral-based chlorinated hydraulic oils
13 01 10*	mineral based non-chlorinated hydraulic oils
13 01 11*	synthetic hydraulic oils
13 01 12*	readily biodegradable hydraulic oils
13 01 13*	other hydraulic oils
13 02 04*	mineral-based chlorinated engine, gear and lubricating oils
13 02 05*	mineral-based non-chlorinated engine, gear and lubricating oils
13 02 06*	synthetic engine, gear and lubricating oils
13 02 07*	readily biodegradable engine, gear and lubricating oils
13 02 08*	other engine, gear and lubricating oils
13 04 01*	bilge oils from inland navigation
13 04 02*	bilge oils from jetty sewers
13 04 03*	bilge oils from other navigation
13 07 01*	fuel oil and diesel
13 07 03*	other fuels (including mixtures)
14	**WASTE ORGANIC SOLVENTS, REFRIGERANTS AND PROPELLANTS**
14 06 01*	chlorofluorocarbons, HCFC, HFC
14 06 02*	other halogenated solvents and solvent mixtures
14 06 03*	other solvents and solvent mixtures

15	**WASTE PACKAGING; ABSORBENTS, WIPING CLOTHS, FILTER MATERIALS AND PROTECTIVE CLOTHING NOT OTHERWISE SPECIFIED**
15 01 02	plastic packaging
15 01 04	metallic packaging
15 01 10*	packaging containing residues of or contaminated by dangerous substances
15 02 02*	absorbents, filter materials (including oil filters not otherwise specified), wiping cloths, protective clothing contaminated by hazardous substances
16	**WASTES NOT OTHERWISE SPECIFIED IN THE LIST**
16 01 07*	Oil filters
16 02 11*	discarded equipment containing chlorofluorocarbons, HCFC, HFC
16 02 13*	discarded equipment containing hazardous components(2) other than those mentioned in 16 02 09 to 16 02 12
16 02 14	discarded equipment other than those mentioned in 16 02 09 to 16 02 13
16 03 03*	inorganic wastes containing dangerous substances
16 03 05*	organic wastes containing dangerous substances
16 03 06	organic wastes other than those mentioned in 16 03 05
16 05 04*	gases in pressure containers (including halons) containing dangerous substances
16 05 09	discarded chemicals other than those mentioned in 16 05 06, 16 05 07 or 16 05 08
16 02 16	components removed from discarded equipment other than those mentioned in 16 02 15
16 06 01*	lead batteries
16 06 02*	Ni-Cd batteries
16 06 03*	mercury-containing batteries
16 06 04	alkaline batteries (except 16 06 03)
16 06 05	other batteries and accumulators
16 10 02	aqueous liquid wastes other than those mentioned in 16 10 01
17	**CONSTRUCTION AND DEMOLITION WASTES (INCLUDING EXCAVATED SOIL FROM CONTAMINATED SITES)**
17 06 01*	insulation materials containing asbestos
17 06 03*	other insulation materials consisting of or containing dangerous substances
17 06 05*	construction materials containing asbestos
17 06 05*	gypsum-based construction materials contaminated with dangerous substances
17 09 03*	other construction and demolition wastes (including mixed wastes) containing dangerous substances
20	**MUNICIPAL WASTES (HOUSEHOLD WASTE AND SIMILAR COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL WASTES) INCLUDING SEPARATELY COLLECTED FRACTIONS**
20 01 33*	batteries and accumulators included in 16 06 01, 16 06 02 or 16 06 03 and unsorted batteries and accumulators containing these batteries
20 01 34	batteries and accumulators other than those mentioned in 20 01 33
20 01 27*	paints (excluding specialist and industrial paints, wood preservatives, aerosol and spray paints, inks, adhesives and resins) pending reuse as paints only
20 01 28	paint, inks, adhesives and resins other than those mentioned in 20 01 27
20 01 13*	Solvents
20 01 21*	fluorescent tubes and other mercury-containing waste
20 01 23*	discarded equipment containing chlorofluorocarbons

20 01 35*	discarded electrical and electronic equipment other than those mentioned in 20 01 21 and 20 01 23 containing hazardous components
20 01 36	discarded electrical and electronic equipment other than those mentioned in 20 01 21, 20 01 23 and 20 01 35
20 03 01	Mixed municipal waste
20 03 03	Street cleaning residues
20 03 07	Bulky wastes

Table 1c Types of Waste Currently Accepted

EWC Code	Description of Waste
15 WASTE PACKAGING; ABSORBENTS, WIPING CLOTHS, FILTER MATERIALS AND PROTECTIVE CLOTHING NOT OTHERWISE SPECIFIED	
15 02	**Absorbents, Filter Materials, Wiping Cloths and Protective Clothing**
15 02 03	Absorbents, filter materials, wiping cloths and protective clothing other than those mentioned in 15 02 02*
17 CONSTRUCTION AND DEMOLITION WASTES (INCLUDING EXCAVATED SOIL FROM CONTAMINATED SITES)	
17 01	**Concrete, bricks, tiles and ceramics**
17 01 01	Concrete
17 01 02	Bricks
17 01 03	Tiles and Ceramics
17 01 07	Mixtures of concrete, bricks, tiles and ceramics other than those mentioned in 17 01 06*
17 02	**Wood, Glass and Plastic**
17 02 01	Wood
17 02 02	Glass
17 02 03	Plastic
17 03	**Bituminous mixtures, coal tar and tarred products**
17 03 02	Bituminous mixtures other than those mentioned in 17 03 01*
17 04	**Metals (including their alloys)**
17 04 01	Copper, bronze, brass
17 04 02	Aluminium
17 04 03	Lead
17 04 04	Zinc
17 04 05	Iron and Steel
17 04 06	Tin
17 04 07	Mixed Metals
17 04 11	Cables other than those mentioned in 17 04 10*
17 05	**Soil (including excavated soil from contaminated sites), stones and dredging spoil**
17 05 04	Soil and stones other than those mentioned in 17 05 03
17 05 06	Dredging spoil other than those mentioned in 17 05 05*

17 05 08	Track ballast other than those mentioned in 17 05 07*
17 06	**Insulation materials and asbestos-containing construction materials**
17 06 04	Insulation materials other than those mentioned in 17 06 01 and 17 06 03
17 08	**Gypsum-based construction material**
17 08 02	Gypsum-based construction materials other than those mentioned in 17 08 01*
17 09	**Other construction and demolition wastes**
17 09 04	Mixed construction and demolition wastes other than those mentioned in 17 09 01, 17 09 02, and 17 09 03

2. Emissions to Air, Water and Land

Table 2 Emissions

POINT SOURCE EMISSIONS TO AIR				
Emission Point Ref.	**Parameter**	**Concentration**	**Unit**	**Source**
N/A				
POINT SOURCE EMISSIONS TO WATER (OTHER THAN SEWERS)				
N/A				
POINT SOURCE EMISSIONS TO SEWERS, ETP'S OR OTHER TRANSFERS OFF SITE				
S1	Max Quantity	4.1	m3/day	Surface Water run-off (current consent levels)
	Max Rate	2.35	m3/hour	
	Max Rate	0.7	l/s	
	Settled COD	2000	mg/l	
	Total grease and oil	50	mg/l	
	Total Phosphorus as P	13	mg/l	
	Suspended solids	2000	mg/l	
	Settleable solids	1000	mg/l	
	Rapidly settleable solids	100	mg/l	
	pH	6-11		
POINT SOURCE EMISSIONS TO LAND				
N/A				

3. Operating Techniques

3a Technical Standards

Table 3a Technical Standards

Description of the Schedule 1 Activity or DAA	Relevant Technical Guidance Note	Document Reference
5.4 A(1)(a)(ii) Surface Water Discharge to Sewer Fuel Storage Storage of waste	Best Available Technique (BAT) Reference Document for Waste treatment, 2018 EA Guidance 'Control and Monitor Emissions for your environmental permit' EA Guidance 'Risk assessments for your environmental permit' EA Guidance 'Fire Prevention Plans: environmental permits'	Section 3a, Main Application Document

3a1 Does your permit (in Table 1.2 Operating Techniques or similar table in the permit) have references to any of your own documents or parts of documents submitted as part of a previous application for this site?

Yes, the documents referred to remain valid. An updated Fire Prevention Plan is provided as part of this application.

Process Description

For EWC codes 20 03 01 (mixed municipal waste), 20 03 03 (street cleaning residues) and 20 03 07 (bulky wastes) the site will continue to operate as described in the original application, see original application documents:

- Appendix 1 Waste Acceptance Procedure
- Process Flow Diagram 1 – Recovery Waste Operation
- Process Flow Diagram 2 – Disposal Listed Activity

These waste streams are likely to be part of larger loads of construction and demolition waste and will undergo the same segregation and treatment process currently in operation.

The majority of other additional waste codes requested (except asbestos related codes and some oil, solvents and packaging codes) are codes which fall under the current S1 and S2 exemptions held by the site (registration number WEX210989). These cover the type of low volume wastes which the operator may currently collect from construction site clients but deliver them directly to an onward treatment site rather than bringing them to the Alperton site for bulking up. The operator now

proposes to bring these waste types to the site for bulking up prior to transfer to onward sites for recovery or disposal. The S1 and S2 exemptions only cover these waste types if they are transferred onward for recovery. Since the operator cannot guarantee all waste types will go on for recovery rather than disposal, it is requested to include them in the main site permit.

The same Waste Acceptance Procedure will be applied to these waste types as follows:

Pre-Acceptance of Waste

Prior to agreeing to accept a waste at the Site, whether for onward recovery or disposal, the operator will undertake a screening step and obtain key information from the customer as follows:

- The nature of the process producing the waste, including any details of expected variability throughout the contract period;
- The expected composition of the waste and any handling requirements;
- The EWC code(s) for the waste; and
- Details of any hazards associated with the waste.

A representative sample of the waste will also be taken and analysed. The number of samples taken will be based on an assessment of the risks of potential problems and will take into account the likely variability of the waste stream. Where the sampling has not already been carried out by the waste producer, the operator will undertake this sampling and analysis. The results will be recorded and made available to Site personnel for the duration of the contract.

Waste deliveries will be pre-booked and approved and waste will only be authorised for delivery if there is sufficient space/capacity for it and the waste is on the Site permitted waste list. Waste tracking will begin with the pre-acceptance checks and records will be kept and used at the acceptance stage set out below.

These control processes enable the operator to prevent the acceptance of unsuitable wastes which could lead to uncontrolled emissions from the Site, and to pre-define the treatment/transfer method that will be applied to the specific waste stream.

Acceptance of Waste

The Site will accept waste delivered in vehicles, either loose or in skips or other smaller containers. The pre-acceptance/screening step will provide much of the needed information for the incoming waste, and therefore the acceptance stage serves to confirm the characteristics of that waste.

Wastes will only be received at the Site via the Site entrance shown on Drawing 2, Site Layout. Upon arrival at the Site, all waste delivery vehicles will be directed to the Site reception and weighbridge office and will remain there until acceptance at the Site has been confirmed and agreed. At the reception area, Site personnel will verify the nature of the waste and complete the relevant sections of the waste transfer or consignment note that accompanies the waste, to confirm the description and composition of the waste.

In accordance with the Waste (England and Wales) Regulations 2011 and the Hazardous Waste (England and Wales) Regulations 2005, the waste transfer or consignment note will contain the following information:

- The transferor/consignor details;
- The date and time of delivery (transfer) of the load;
- The type of vehicle delivering the waste, vehicle registration, the drivers name and the operator of the vehicle;
- EWC code(s) as per the List of Wastes (England) Regulations 2005;
- The quantity of waste and whether it is loose or in a container (if the latter, details of the type of container);
- The SIC code of the transferor;
- Details of the Site (including reference to the EP); and
- Carrier registration details for the company delivering the waste.

The note must also include a statement that the waste hierarchy has been considered when identifying the disposal/recovery route for the waste. The note will be signed by the carrier and the receiver whilst on-site to confirm the transfer of the waste by both parties.

Part E of the consignment note will also be completed for hazardous wastes, including:

- individual EWC code(s) received, checking the waste is as classified and described in part B of the note. If the code in part B is incorrect, the waste will be rejected;
- quantity of each code received (in kg);
- EWC code accepted or rejected;
- waste management operation recovery or disposal code (this will be R13 or D15 in all cases as waste will only be stored pending onward transfer, not treated).

The waste and carrier details are entered onto the Site computer and will augment the pre-acceptance information already recorded. A summary of the waste types and quantities will be provided to the EA in an agreed summarised form, monthly or another agreed period.

All loads will be subject to visual inspection to check that they accord with the booked in delivery details. A further check on the nature of the waste will be made at the point of deposit, either within the transfer building or hazardous waste storage areas, to ensure that no unacceptable waste is unloaded, that was previously hidden within the contained load.

Unauthorised and Rejected Waste

Any loads or part loads identified as unacceptable upon visual inspection at the weighbridge or upon discharge of the load on site, shall be reloaded into the container or isolated (in the dedicated quarantine area) as appropriate whilst further investigation is undertaken.

Unacceptable waste may comprise non-conforming waste. A non-conforming waste is any material that is not allowed by the permit, or is present in the load but not recorded on the accompanying waste documentation. Where the non-conformance relates to the minor omissions or inaccuracies in the waste documentation, Site personnel will correct this, if appropriate, such that the load can be

accepted. Where the non-conformance relates to the presence of waste not allowed by the permit, the load will be rejected or quarantined.

If applicable, the operator will notify the waste carrier and the producer (where different) of the decision to reject the load, including the specific reasons for it. Rejected waste will be returned immediately to the producer, via the waste carrier.

Details of the rejection of a load will be kept on Site. This will include time and date, haulier and vehicle registration, customer, type of waste, and reason for rejection.

Storage of Waste

The operator will provide a dedicated storage area on the site for hazardous waste types, comprising a building as well as the use of self-bunded metal containers (see Drawing 2). Each waste type will be stored separately in sealed metal or plastic drums, boxes, or cabinets, depending on the type of waste. Secondary containment will be provided for waste oils and oil filters, paints, solvents, CFC's, HCFC's and HFC's, in the form of mobile bunding or self-bunded storage containers. The designated storage area has an impermeable concrete floor and no internal drains within the building. All yard drains are directed to the site interceptor prior to release to foul sewer.

There will be no treatment of these waste streams.

Asbestos Containing Wastes

Finally, the operator proposes to accept construction or demolition wastes containing asbestos or other dangerous substances, for bulking up prior to an onward site. Asbestos containing wastes will only be accepted if they are double bagged with all bags intact. Asbestos wastes will be stored in a lockable container where size allows or a labelled skip.

Site Drainage

The site drainage plan can be seen in Drawing 3. The drainage system is a sealed system which collects surface water run-off and any run-off from the Aco drains at the tipping building entrance and feeds into an interceptor prior to discharge to the foul sewer. The operator holds an effluent discharge consent for this purpose (see Appendix B).

There are two 30,000 litre plastic rainwater harvesting tanks on site which collect roof run-off in a sealed siphonic system. This water can be used for fire-fighting and also for dust suppression.

3b General Requirements

Table 3b General Requirements

Are emissions of substances not controlled by emission limits an important issue?	Yes
Is odour an important issue?	Yes
Is noise and vibration an important issue?	No

Fugitive Emissions to Sewer, Surface Water and Groundwater

The site drainage plan can be seen in Drawing 3.

Surface water run-off from external yard areas, and any run-off from inside the building, are collected into the sealed drainage system which flows to foul sewer via a 20,000 litre capacity oil/water separator interceptor. Discharge to sewer from the interceptor can be prevented with a shut-off valve. The operator holds a trade effluent consent for this discharge from Thames Water which contains limits a set out in Table 2 (see Appendix B). Thames Water have never raised any compliance issues with this consent.

The River Brent is approximately 100 m to the South of the site. The site is not in a Source Protection Zone.

Rainwater from roof run-off is collected in a separate siphonic system and stored in two 30,000 litre rainwater harvesting tanks for use in dust and odour suppression systems, and for fire-fighting if required.

The site consists entirely of hardstanding with sealed construction joints. The condition of hardstanding is regularly inspected as part of the weekly facility audit and any improvements scheduled as required. The Site was previously used as a heavy plant yard and the concrete specification was inherited; it is believed to be at least 300mm deep and appropriate for heavy plant use.

Bulk tanks on site are detailed in Table 4 below and consist of rainwater harvesting tanks, diesel and gas oil tanks for vehicle/equipment refuelling, and an adblue tank. Inspection of the condition of tanks and bunds is part of the weekly facility audit. Hydraulic oil is stored in smaller containers on bunding.

Waste is stored in bays within the building and in bays and containers in the yard. Hardcore and soil are stored in bays, and there are 15 roll on/roll off containers for the following waste types:

1. COREX
2. CARDBOARD
3. SACKS
4. PLASTERBOARD
5. PLASTERBOARD
6. HEAVY METAL
7. PVC WINDOW FRAMES
8. PVC WINDOW FRAMES
9. CABLE
10. ALUMINIUM
11. STAINLESS
12. LENGTHS OF WOOD
13. TARMAC
14. GREEN WASTE
15. CONSTRUCTION FILM.

Containers/skips are inspected for integrity and any leaking containers taken out of use. Baled cardboard, plastic and RDF are also stored in the yard up to a maximum of 80 bales.

For the new waste streams proposed, separate storage for each waste stream will be within sealed metal or plastic drums, boxes and cabinets within a dedicated building and self-bunded metal cabinets in the yard. All storage areas will be labelled with the type of waste and the maximum capacity of storage allowed. A spill it is provided in the dedicated storage building.

All waste streams are stored away from roadways and vehicle movements to avoid risk of collision. Spill clean-up equipment and spill procedures are in place at the site and all staff trained in these procedures.

Table 4 Vessel Inventory

Tank Ref:	Substance Stored	Capacity (litres)	Material of construction of tank and Condition	Location (internal/external)	Potential Emissions (venting/leaks/spills)	Emission Control Technique Primary, secondary & tertiary including PPM
1	Diesel fuel	20,000	Stainless Steel	External	Leaks/spills during refuelling/delivery/as a result of collision	Tank located away from vehicle movements; Integrally bunded; auto shut off.
2	Gas Oil	10,000	Stainless	External	Leaks/spills during refuelling/delivery/as a result of collision	Tank located away from vehicle movements; Integrally bunded.
3	Adblue	1,000	Plastic	External	Leaks/spills during refuelling/delivery/as a result of collision	Tank located away from vehicle movements and bunded.
4,5	Rainwater	2 x 30,000	Plastic	External	Leaks/spills as a result of loss of integrity/collision	Tank located away from vehicle movements.

Dust, Mud Litter

A Dust Management Plan is in place for the site. It is not considered that the proposed new waste streams increase the risk dust from the site as existing measures will be adequate. The Dust Management Plan has been reviewed and updated in line with current Environment Agency Guidance and can be found at Appendix C.

Basic measures employed at the site include:

- All waste treatment activities carried out inside the building;
- Fast closing roller shutter doors in place;
- Minimising drops from conveyors;
- Regular site inspections and housekeeping (weekly facility audit);
- Use of road sweepers;
- Perimeter fencing;
- Vehicle loads enclosed or sheeted as far as possible;
- Site speed limits and no idling policy;
- Single entry and exit point on to the public highway;
- All roadways and yard areas of hardstanding;
- Jet wash area for cleaning site equipment and wheel washing if required;
- Hoses for cleaning down site surface;
- Use of dust suppression systems (see DMP for details);
- Operation of PM10 monitor – regularly calibrated.

Odour management plan

Whilst odour is not a significant issue at the site due to the types of waste received, as an industrial waste transfer station the operator is obliged to prepare and submit an Odour Management Plan, see Appendix D.

It is not considered that the proposed new waste streams to be accepted on the site will increase the risk of odour due to their nature, low volumes and enclosed storage. As part of the operator's management system, there is a complaints procedure in place to record and investigate any potential instances of odour from the site.

Noise and Vibration

It is not considered that the proposed new waste streams to be accepted on site will increase the risk of noise. The operational hours of the site are 24/7 and will remain the same.

Waste segregation, processing and transfer activities are carried out within an enclosed building. Noise generating equipment is located at the end of the building furthest away from the closest sensitive receptors. The building has acoustic cladding in place on three sides. Equipment is purchased with noise levels taken into account, and proprietary acoustic enclosing of pumps/motors

etc. where supplied as such. For mobile plant, the site speed limit is in place, plus a 'no idling' policy and minimisation of vehicle movements on site. Heavy plant is fitted with appropriate noise mitigation. Daily maintenance inspections are carried out on all equipment.

The Site has a noise meter to enable regular noise readings to be taken around the site, in particular if there is problem or complaint. Noise readings are taken as part of the weekly facility audit.

As part of the operator's management system, there is a complaints procedure in place to record and investigate any potential instances of noise from the site, no such complaints have been received.

Pest Management

It is not considered that the proposed new waste streams to be accepted on site will increase the risk of pests due to the nature of the wastes. Waste segregation, processing and transfer activities are carried out within an enclosed building. Housekeeping procedures will ensure litter is cleared frequently, so scavenging animals and birds will not be attracted to the site. A pest control contract in place.

3c Questions for Specific Sectors

Not applicable – there will be no treatment of hazardous wastes. Wastes will be stored pending recovery or disposal at another site.

3d Management Systems

The site operates an environmental management system certified to ISO14001:2015. The system includes the following:

- An environmental aspects register which identifies activities at the site with the potential to have an impact on the environment, an assessment of the associated risks and related control procedures.
- A planned preventative maintenance regime and routine inspections, incorporating a maintenance plan for all key items of infrastructure and equipment.
- Routine documented monitoring of key parameters including waste tracking and tonnages, utilities (electricity, gas, diesel, mains water), and incidents/spillages.
- An accident plan is present on site which includes emergency procedures for all environmental scenarios including minor and major spillages, waste storage failure, vehicle collision, fire, flood, vandalism and non-compliant waste transfers. A summary of accident scenarios is provided in Table 5 below.
- Objectives and targets have been set within the management system including monitoring of utilities, carbon footprinting of haulage vehicles and improvements to dust management on site.
- Environmental performance is regularly reviewed by the management team and improvement targets are in place as above.
- Complaints are managed according to site procedures. This describes the method of recording complaints, the investigation process and response to the complainant.
- Standard Operating Procedures are in place for all key waste treatment and maintenance operations.
- Audits of compliance against the ISO14001:2015 standard and all legal requirements including the existing permit conditions are carried out periodically.
- Records are kept of all monitoring parameters, checks, inspections, training, audits, concerns and complaints, in accordance with current permit conditions.
- Roles and responsibilities for all aspects of the EMS are documented in the Environmental Manual. All environmental operations are trained out to the relevant personnel on site, including escalation procedures and the receipt and investigation of any potential complaints.
- The operator reports to the Environment Agency as required in the current permit conditions.

Accident Management Plan

Table 5 Accident Management Plan

Incident/Abnormal Circumstance	Likelihood	Consequence	Prevention Measures	Mitigation Measures
Equipment breakdowns	Medium	Reduced ability to process waste; build up of waste on site.	Planned Preventative Maintenance of all equipment; Service contracts for main equipment.	Service contracts/agreed response times in place for main equipment; Divert waste to other sites if nearing capacity.
Oil/chemical spillages	Low	Mobilisation of pollutants on site with potential to migrate to drainage system/ground.	Substances only present on site in small quantities; Hazardous wastes stored in dedicated building in appropriate containers; Spill kits in place and staff trained in their use; Interceptor in place on site drainage prior to entering the sewer; Site vehicle management e.g. speed limits, designated routes;	All drains pass through an interceptor prior to final release; interceptor shut-off; Spill kits; Spill procedures;
Waste Storage Failure	Low	Release of waste to the environment; nuisance issues including odour, dust, litter.	Waste stored within building or in dedicated external bays or containers; Regular visual inspection of storage areas and site infrastructure and hardstanding; Waste not allowed on site unless there is adequate capacity; Throughput of waste as quick as possible to prevent build up.	Use alternative storage areas on site; Clear up escaped waste; Divert waste to other sites if it cannot be safely stored;
Fire	Low	Emission of smoke/dust to air	Site fire risk assessment; Fire Prevention Plan; Fire detection systems; Fire-fighting equipment;	Fire response/evacuation plan;

Incident/Abnormal Circumstance	Likelihood	Consequence	Prevention Measures	Mitigation Measures
			Fire marshals appointed and trained from Site staff. Rainwater harvesting for damping down, water to be kept in large tank. Should be able to fight fire for 90 minutes. Site layout designed so as to allow fire engine access; Planned Preventative Maintenance of all equipment; Hot works only allowed in welding shed.	
Contaminated Firewater	Low	Release of contaminated water to sewer/surface water/ground	Fire prevention measures as above; Site interceptor can be closed off to prevent run-off leaving site if necessary.	Site interceptor can be closed off to prevent run-off leaving site if necessary.
Release of out of specification effluent	Low	Potential impact at WWTW Breach of effluent consent	Release of surface water run-off only;	Site interceptor can be closed off to prevent run-off leaving site if necessary.
Blocked Drains	Low	Accumulation of surface water	Planned Preventative Maintenance of drainage system;	Contractor call-out for jetting if required
Flooding	Low – site is not in a flood zone	Mobilisation of pollutants on site with potential to migrate to drainage system/river/ground.	Dedicated storage areas; Bunding for chemical storage and fuel/gas oil, adblue;	Isolation of utilities; Lock off all vessel valves
Vandalism	Low	Spills/litter/damage to property/nuisance	24 hour site security; CCTV; full perimeter fencing	Spill procedures
Non-compliant waste transfer	Low	Breach of permit conditions	Waste acceptance procedures in place; All staff trained in waste acceptance procedures; WAMITAB certified staff.	Record kept of any non-compliant waste arriving at site; Disposal of non-compliant waste to appropriately licensed contractor.

Incident/Abnormal Circumstance	Likelihood	Consequence	Prevention Measures	Mitigation Measures
Vehicle Collision	Low	Spillage of waste or fuel; damage to site infrastructure	All vehicles delivering waste will be enclosed; fuel storage tanks positioned to minimise likelihood of impact from vehicles; Waste storage areas for hazardous wastes, bales, RDF are away from vehicle routes; All drivers have appropriate training; Vehicle numbers and speed on site is limited; Facility situated on impermeable hardstanding.	Spill kits; Spill procedures; Clear up escaped waste;

4. Monitoring

4a Describe the measures you use for monitoring emissions

The operator will continue with the existing monitoring schedule as set out in the existing permit and does not propose any further monitoring. This includes continuous monitoring of ambient air for PM10 using the existing dust monitor – see Dust Management Plan in Appendix C.

A weekly facility audit is also completed at the site (see Appendix I).

4b Point source emissions to air only

As above – there are no point source emission to air.

5. Fire Prevention Plan

The Fire Prevention Plan has been reviewed and updated in accordance with current Environment Agency guidance to account for the proposed additional waste streams. See Appendix F.

6. Environmental Risk Assessment

The following section addresses the potential impact of the proposed changes on the surrounding area.

Sensitive Receptors

The following sensitive receptors have been identified as being potentially affected by operations at the site. Statutory and non-statutory ecological receptors have been identified within a 10km radius (for Ramsar and SAC sites) and a 2km radius for SSSI's, using the EA habitats screening service and magic.gov.uk. The site is not expected to have a significant impact on ecological receptors as there are no direct emission to air, water or ground from the site. Human receptors immediately surrounding the site which may be sensitive to nuisance from odour, dust, or noise from the site have also been identified. These are also shown in Drawing 4.

Table 6

Name of Receptor (designation/distance/direction)	Nature of Receptor	Emission which may impact on the receptor and their relevant pathways
Ecological Receptors (Statutory)		
Fox Wood LNR 900m SE	Local Nature Reserve	Airbourne Emissions of Dust, Odour, Noise
Perivale Wood LNR 1.5km NW	Local Nature Reserve	Airbourne Emissions of Dust, Odour, Noise
Litten Nature reserve 3km W	Local Nature Reserve	Airbourne Emissions of Dust, Odour, Noise
Grove Farm LNR 3.2km NW	Local Nature Reserve	Airbourne Emissions of Dust, Odour, Noise
Blondin Nature Area LNR 4.2 SSW	Local Nature Reserve	Airbourne Emissions of Dust, Odour, Noise
Gunnersbury Triangle LNR 4.8km SE	Local Nature Reserve	Airbourne Emissions of Dust, Odour, Noise
Long Wood LNR 4.6km SW	Local Nature Reserve	Airbourne Emissions of Dust, Odour, Noise
Northolt Manor LNR 4.6 WNW	Local Nature Reserve	Airbourne Emissions of Dust, Odour, Noise
Masons Field LNR 4.6km NNE	Local Nature Reserve	Airbourne Emissions of Dust, Odour, Noise
Wormwood Scrubs LNR 4.5km ESE	Local Nature Reserve	Airbourne Emissions of Dust, Odour, Noise

Water Receptors		
River Brent 150m S	Surface Water	Emission of pollutants to surface waters or ground
Grand Union Canal 600m N	Surface Water	Emission of pollutants to surface waters or ground
Human Receptors		
Alperton Lane/May Gardens 25m WNW	Human Receptor	Airbourne emissions of dust, odour, noise
Alperton Recreation Ground 35m NE	Human Receptor	Airbourne emissions of dust, odour, noise
Neighbouring commercial/business area (mixed) from 10m E	Human Receptor	Airbourne emissions of dust, odour, noise
Vicar's Green Primary School 275m WNW	Human Receptor	Airbourne emissions of dust, odour, noise
Football ground (part of Brentham Club) 395 SW	Human Receptor	Airbourne emissions of dust, odour, noise
River Brent and associated footpath 150m S	Human Receptor	Airbourne emissions of dust, odour, noise
Grand Union Canal Walking Path 600m N	Human Receptor	Airbourne emissions of dust, odour, noise
Residential area (including allotments and Lynwood Road) 230m SE	Human Receptor	Airbourne emissions of dust, odour, noise
Perivale Village 250m W	Human Receptor	Airbourne emissions of dust, odour, noise
St Gregory's Primary School 870m S	Human Receptor	Airbourne emissions of dust, odour, noise
Perivale Primary School 540m NW	Human Receptor	Airbourne emissions of dust, odour, noise

Impact of Emissions to Air

There are no significant changes to emissions to air arising from the proposed changes to the operation. The Dust Management Plan has been reviewed and updated to account for the proposed new waste streams to be accepted by the site.

Impact of Noise

There are no significant sources of noise arising from the proposed changes to the operation. No formal complaints relating to noise have been received. Noise is not considered a significant issue.

Odour

There are no significant sources of odour arising from the proposed changes to the operation. No formal complaints relating to odour have been received. Odour is not considered a significant issue.

Emissions to Sewer

There are no significant changes to emissions to sewer arising from the proposed changes to the operation. The site will continue to be able to operate within the parameters of its discharge consent. Compliance with the discharge consent is considered mitigation of the risk.

Emissions to Surface Water and Groundwater

Sections 3b Fugitive Emissions and 3d Accident Management Plan have described the sites approach to managing the risk posed by acceptance of proposed new waste streams on the site. This is summarised in the risk assessment in Appendix H.

Conclusion

The impact of the changes to the installation has been summarised in the updated Environmental Risk Assessment in Appendix H. It is concluded that the proposed changes to the installation will be managed sufficiently so as to present a low ongoing risk to the environment.

7. Resource Efficiency and Climate Change

7a. Describe the basic measures for improving how energy efficient your activities are

Energy is used on site in the form of electricity and diesel/gas oil fuel for vehicles, equipment and machinery, lighting and office functions. These impacts are identified in the site Aspects Register as part of the EMS, with associated controls in the form of maintenance and servicing of all site plant and equipment in accordance with manufacturer guidelines to optimise energy efficiency, and consideration of energy consumption when purchasing or hiring equipment and plant. Objectives and targets are also in place as part of the EMS which include tracking fuel and electricity use in order to set targets for reductions and efficiencies.

A no idling policy is also in place on site to reduce fuel usage.

7b. Provide a breakdown of any changes to the energy your activities use up and create

The proposed changes to the accepted waste types will not have any impact on the amount of energy used. The overall increase in waste throughput will likely see a corresponding increase in total fuel and electricity use, but there is no reason to assume this will be an increase per tonne of waste processed.

7c. Have you entered into, or will you enter into, a climate change levy agreement?

No. Basic energy efficiency measures in place as described above.

7d. Explain and justify the raw and other materials, other substances and water that you will use

Minimal raw materials are used. These include fuel, adblue for vehicles and water for cleaning and damping down (see Table 4). The site collects rainwater from the roof for use on site, thereby minimising towns water use. A small amount of maintenance consumables are also used by the site to ensure a high standard of maintenance of equipment and machinery.

7e. Describe how you avoid producing waste in line with Council Directive 2008/98/EC on waste

The site aims to maximise the amount of accepted waste recycled and recovered (targeting 80-85%). The most appropriate route for disposal of wastes which cannot be recycled or recovered will be sought in line with waste disposal legislation.

Appendices

Appendix A – Site Plans

i) Drawing 1 Installation Location and Boundary

ii) Drawing 2 Site Layout

iii) Drawing 3 Drainage Plan

iv) Drawing 4 Sensitive Receptors

Appendix B – Discharge Consent

Appendix C – Dust Management Plan

Appendix D – Odour Management Plan

Appendix E – Assessment against BREF

Appendix F – Fire Prevention Plan

Appendix G – WAMITAB Evidence

Appendix H – Environmental Risk Assessment

Appendix I – Weekly Facility Audit