Wardell Armstrong
Sir Henry Doulton House, Forge Lane, Etruria, Stoke-on-Trent, ST1 5BD, United Kingdom
Telephone: +44 (0)1782 276 700 www.wardell-armstrong.com

Our ref: LP/CP/ST16653/LET-001 *Date*: 17 December 2018
Your ref:

Permitting Support Centre
Environment Agency
Quadrant 2
99 Parkway Avenue
Parkway Business Park
Sheffield
S9 4WF

By email

Dear PSC,

Environmental Permit Application

On behalf of Wastecare Limited please find attached an application for a new bespoke installation environmental permit at Units 1-6 North Dean Business Park, Stainland Road, Halifax, HX4 8LR.

We trust the application includes sufficient information to be determined however, please do not hesitate to come back to me if you have any questions or want to discuss the application further.

Yours sincerely
for Wardell Armstrong LLP

LUKE PRAZSKY
Technical Director
lprazsky@wardell-armstrong.com

Enc

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WASTE RESOURCE MANAGEMENT

WASTECARE LIMITED

BATTERY TREATMENT FACILITY, HALIFAX

PERMIT APPLICATION

DECEMBER 2018

wardell armstrong

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Sir Henry Doulton House, Forge Lane, Etruria, Stoke-on-Trent, ST1 5BD, United Kingdom
Telephone: +44 (0)1782 276 700 www.wardell-armstrong.com

DATE ISSUED: 17 December 2018

JOB NUMBER: ST16653

WASTECARE LIMITED

BATTERY TREATMENT FACILITY, HALIFAX

PERMIT APPLICATION

DECEMBER 2018

PREPARED BY:

Alison Cook Associate Director

APPROVED BY:

Luke Prazsky Technical Director

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WASTE RESOURCE MANAGEMENT

APPLICATION FORMS

Form A

Application for an environmental permit Part A – About you

You will need to fill in this part A if you are applying for a new permit, applying to change an existing permit or surrender your permit, or want to transfer an existing permit to yourself. Please check that this is the latest version of the form available from our website.

Please read through this form and the guidance notes that came with it.

The form can be:

1 Saved onto a computer and then filled in. Please note that the form follows a logic that means questions will open or stay closed depending on a previous answer. So you may not be able to enter text in some boxes.

2 Printed off and filled in by hand. Please write clearly in the answer spaces.

Note: if you believe including information on a public register would not be in the interests of national security you must tick the box in section 4 of F1 or F3 and enclose a letter telling us that you have told the Secretary of State. We will not include the information in the public register unless directed otherwise.

It will take less than one hour to fill in this part of the application form.

Where you see the term 'document reference' on the form, give the document references and send the documents with the application form when you've completed it.

Contents

1 About you

Are you applying as an individual, an organisation of individuals (for example, a partnership), a company (this includes Limited Liability Partnerships) or a public body?

An individual	☐ Now go to section 2
An organisation of individuals (for example, a partnership)	☐ Now go to section 3
A public body	☐ Now go to section 4
A registered company or other corporate body	☑ Now go to section 5

2 Applications from an individual

2a Please give us the following details

Name

Title (Mr, Mrs, Miss and so on)

First name

Last name

Date of birth (DD/MM/YYYY)

Now go to section 6

3 Applications from an organisation of individuals

3a Type of organisation

For example, a charity, a partnership, a group of individuals or a club

3b Details of the organisation

If you are an organisation of individuals, please give the details of the main representative below. If relevant, provide details of other members (please include their title Mr, Mrs and so on) on a separate sheet and tell us the document reference you have given this sheet.

3 Applications from an organisation of individuals, continued

Contact name

Title (Mr, Mrs, Miss and so on)

First name

Last name

Date of birth (DD/MM/YYYY)

Now go to section 6

4 Applications from public bodies

4a Type of public body

For example, NHS trust, local authority, English county council

4b Name of the public body

4c Please give us the following details of the executive

An officer of the public body authorised to sign on your behalf

Name

Title (Mr, Mrs, Miss and so on)

First name

Last name

Position

Now go to section 6

5 Applications from companies or corporate bodies

5a Name of the company

Wastecare Limited

5b Company registration number

01631444

Date of registration (DD/MM/YYYY)

27/04/1982

If you are applying as a corporate organisation that is not a limited company, please provide evidence of your status and tell us below the reference you have given the document containing this evidence.

Document reference

Now go to section 6

5c Please give details of the directors

If relevant, provide details of other directors on a separate sheet and tell us the reference you have given this sheet.

Document reference

see List of Directors

Details of directors

Title (Mr, Mrs, Miss and so on)

First name

Last name

Date of birth (DD/MM/YYYY)

6 Your address

6a Your main (registered office) address

For companies this is the address on record at Companies House.

Contact name

Title (Mr, Mrs, Miss and so on)

First name

Last name

Address

Richmond House
Selby Road
Garforth,
Leeds

Postcode LS2 1NB

Contact numbers, including the area code

Phone

Fax

Mobile

Email

For an organisation of individuals every partner needs to give us their details, including their title Mr, Mrs and so on. So, if necessary, continue on a separate sheet and tell us below the reference you have given the sheet.

Document reference for the extra sheet

6b Main UK business address (if different from above)

Contact name

Title (Mr, Mrs, Miss and so on)

First name

Last name

Address

Postcode

Contact numbers, including the area code

Phone

Fax

Mobile

Email

Now go to section 7

7 Contact details

7a Who can we contact about your application?

This can be someone acting as a consultant or an 'agent' for you.

Contact name

Title (Mr, Mrs, Miss and so on)	Mr
First name	Luke
Last name	Prazsky
Address	Sir Henry Doulton House
	Forge Lane
	Etruria
	Stoke on Trent
Postcode	ST1 5BD

Contact numbers, including the area code

Phone	01782 276700
Fax	
Mobile	07500 668990
Email	lprazsky@wardell-armstrong.com

7b Who can we contact about your operation (if different from question 7a)?

Contact name

Title (Mr, Mrs, Miss and so on)	Mrs
First name	Helen
Last name	Kellett
Address	Tyler Close
	Normanton Industrial Estate
	Wakefield
Postcode	WF6 1RL

Contact numbers, including the area code

Phone	01924 220800
Fax	
Mobile	07795 400071
Email	helen.kellett@wastecare.co.uk

7 Contact details, continued

7c Who can we contact about your billing or invoice?

As in question 7a ☐

As in question 7b ☑

Please give details below if different from question 7a or 7b.

Contact name

Title (Mr, Mrs, Miss and so on)

First name

Last name

Address

Postcode

Contact numbers, including the area code

Phone

Fax

Mobile

Email

8 How to contact us

If you need help filling in this form, please contact the person who sent it to you or contact us as shown below.

General enquiries: 03708 506 506 (Monday to Friday, 8am to 6pm)

Textphone: 03702 422 549 (Monday to Friday, 8am to 6pm)

Email: enquiries@environment-agency.gov.uk

Website: www.gov.uk/government/organisations/environment-agency

If you are happy with our service, please tell us. It helps us to identify good practice and encourages our staff. If you're not happy with our service, or you would like us to review a decision we have made, please let us know. More information on how to do this is available at: www.gov.uk/government/organisations/environment-agency/about/complaints-procedure

Please tell us if you need information in a different language or format (for example, in large print) so we can keep in touch with you more easily.

Feedback

(You don't have to answer this part of the form, but it will help us improve our forms if you do.)

We want to make our forms easy to fill in and our guidance notes easy to understand. Please use the space below to give us any comments you may have about this form or the guidance notes that came with it.

How long did it take you to fill in this form?

We will use your feedback to improve our forms and guidance notes, and to tell the Government how regulations could be made simpler.

Would you like a reply to your feedback?

Yes please ☐

No thank you ☐

Crystal Mark 19101
Clarity approved by Plain English Campaign

For Environment Agency use only

Date received (DD/MM/YYYY)

Our reference number

Payment received?

No ☐

Yes ☐ Amount received

£

List of Directors

Date of birth information for Directors.

Company Name: WASTECARE LIMITED

Companies House Link:
https://beta.companieshouse.gov.uk/company/01631444/officers

Date: 28.11.18

	Name	Date of Birth
1	HUNT, Peter Timothy	**13/12/1955**
2	HUNT, Rebecca Mary	**07/05/1954**
3	OWEN, Mark	**09/05/1972**
3	PARKIN, Graeme Michael	**19/09/1973**

Form B2

Application for an environmental permit Part B2 – General – new bespoke permit

Fill in this part of the form together with parts A and F1 if you are applying for a new bespoke permit. You also need to fill in part B3, B4, B5, B6, or B7 (this depends on what activities you are applying for). Please check that this is the latest version of the form available from our website.

Please read through this form and the guidance notes that came with it.

The form can be:

1 Saved onto a computer and then filled in. Please note that the form follows a logic that means questions will open or stay closed depending on a previous answer. So you may not be able to enter text in some boxes.

2 Printed off and filled in by hand. Please write clearly in the answer spaces.

It will take less than two hours to fill in this part of the application form.

Contents

1 About the permit

1a Discussions before your application

If you have had discussions with us before your application, give us the permit reference or details on a separate sheet. Tell us below the reference you have given this extra sheet.

Permit or document reference

1b Is the permit for a site or for mobile plant?

Site ☑ Now go to section 2

Mobile plant ☐ Now go to question 1c

Note: The term 'mobile plant' does not include mobile sheep dipping unit.

Mobile plant

1c Have we told you during pre-application discussions that we believe that a mobile permit is suitable for your activity?

No ☐

Yes ☐

1d Have there been any changes to your proposal since this discussion?

No ☐ Now go to section 3

Yes ☐ You should send us a description of the activity you want to carry out, highlighting the changes you have made since our pre-application discussions.

Document reference

Now go to section 3

2 About the site (but not mobile plant)

2a What is the site name, address, postcode and national grid reference?

Site name: Halifax Battery Treatment Facility

Address: Units 1-6
North Dean Business Park
Stainland Road
Halifax

Postcode: HX4 8LR

National grid reference for the site
(for example, ST 12345 67890): SE 09578 22023

2b What type of regulated facility are you applying for?

Note: if you are applying for more than one regulated facility then go to 2c.

- Installation ☐
- Waste operation ☐
- Mining waste operation ☐
- Water discharge activity ☐
- Groundwater activity (point source) ☐
- Groundwater activity (discharge onto land) ☐

What is the national grid reference for the regulated facility (if only one)? (See the guidance notes on part B2.)

- As in 2a above ☐
- Different from that in 2a ☐ Please fill in the national grid reference below

National grid reference for the regulated facility:

Now go to question 2d

2c If you are applying for more than one regulated facility on your site, what are their types and their grid references?

See the guidance notes on part B2.

Regulated facility 1

National grid reference: AS PER 2A

What is the regulated facility type?

- Installation ☑
- Waste operation ☐
- Mining waste operation ☐
- Water discharge activity ☐
- Groundwater activity (point source) ☐
- Groundwater activity (discharge onto land) ☐

Regulated facility 2

National grid reference: AS PER 2A

What is the regulated facility type?

- Installation ☐
- Waste operation ☑
- Mining waste operation ☐
- Water discharge activity ☐
- Groundwater activity (point source) ☐
- Groundwater activity (discharge onto land) ☐

2 About the site, continued

Use several copies of this page or separate sheets if you have a long list of regulated facilities. Send them to us with your application form. Tell us below the reference you have given these extra sheets.

Document reference for the extra sheets

Now go to question 2d

2d Low impact installations (installations only)

Are any of the regulated facilities low impact installations?

No ☑

Yes ☐ If yes, tell us how you meet the conditions for a low impact installation. (See the guidance notes on part B2 – Appendix 1.)

Document reference

Tick the box to confirm you have filled in the low impact installation checklist in appendix 1 for each regulated facility. ☐

2e Treating batteries

Are you planning to treat batteries? (See the guidance notes on part B2.)

No ☐

Yes ☑ Tell us how you will do this, send us a copy of your explanation and tell us below the reference you have given this explanation.

Document reference for the explanation

2f Ship recycling

Is your activity covered by the Ship Recycling Regulations 2015? (See the guidance notes on part B2.)

No ☑

Yes ☐ Tell us how you will do this. Please send us a copy of your explanation and your facility recycling plan, and tell us below the reference numbers you have given these documents

Document reference for the explanation

Document reference for the facility recycling plan

2g Multi-operator installation

If the site is a multi-operator site (that is there is more than one operator of the installation) then fill in the table below the application reference for each of the other permits.

Table 1 – Other permit application references

3 Your ability as an operator

If you are only applying for a standalone water discharge or for a groundwater activity, you only have to fill in question 3d.

3a Relevant offences (applies to all except standalone surface water discharges and groundwater discharges – see the guidance notes on part B2)

Have you, or any other relevant person, been convicted of any relevant offence?

No ☑ Now go to question 3b

Yes ☐ Please give details below

Name of the relevant person

Title (Mr, Mrs, Miss and so on)

First name

Last name

Date of birth (DD/MM/YYYY)

Position at the time of the offence

3 Your ability as an operator, continued

Name of the court where the case was dealt with

Date of the conviction (DD/MM/YYYY)

Offence and penalty set

Date any appeal against the conviction will be heard (DD/MM/YYYY)

If necessary, use a separate sheet to give us details of other relevant offences and tell us below the reference number you have given the extra sheet.

Document reference of the extra sheet

3b Technical ability (relevant waste operations only – see the guidance notes on part B1)

Please indicate which of the two schemes you are using to demonstrate you are technically competent to operate your facility and the evidence you have enclosed to demonstrate this.

ESA/EU skills

Please select one of the following:

I have enclosed a copy of the current Competence Management System certificate ☐

or

We will have a certified Competence Management System within 12 months and have enclosed evidence of the contract with an accredited certification body ☐

CIWM/WAMITAB scheme

Please select **one** of the following:

- I have enclosed a copy of:
  - the relevant qualification certificate/s ☑

  or
  - evidence of deemed competence ☐

  or
  - Environment Agency assessment ☐

  or
  - evidence of nominated manager status under the transitional provisions for previously exempt activities ☐

  and, if deemed competent or Agency-assessed or nominated manager, or if the original qualification is over two years old:

  I have enclosed a copy of the relevant current continuing competence certificate/s ☐
- I will complete my qualification within four weeks of starting the permitted activities and have enclosed evidence of my registration with WAMITAB or my EPOC booking as appropriate ☐
- **For medium- and high-risk tier activities other than landfill** I will complete the qualification within 12 months and have enclosed evidence of registration with WAMITAB and, where relevant, EPOC booking. I understand I must complete either four specified units of the relevant qualification or an EPOC within four weeks of the permitted activities commencing ☐

For each technically competent manager please give the following information. If necessary, use a separate sheet to give us these details and tell us below the document reference you have given the extra sheet:

Title (Mr, Mrs, Miss and so on)	Ms
First name	Helen
Last name	Kellett
Date of birth (DD/MM/YYYY)	27/02/1978
Phone	01924 220800
Mobile	07795 400071
Email	helen.kellett@wastecare.co.uk

3 Your ability as an operator, continued

Please provide the environmental permit number/s and site address for **all** other waste activities that the proposed technically competent manager provides technical competence for, including permits held by other operators. Continue on a separate sheet as required.

Permit number	Site address	Postcode

Document reference of the extra sheet

Now go to question 3c

3c Finances (for installations, waste operations and mining waste operations only)

Please note that if you knowingly or carelessly make a statement that is false or misleading to help you get an environmental permit (for yourself or anyone else), you may be committing an offence under the Environmental Permitting (England and Wales) Regulations 2010.

Do you or any relevant person or a company in which you were a relevant person have current or past bankruptcy or insolvency proceedings against you?

No ☑

Yes ☐ Please give details below, including the required set-up costs (including infrastructure), maintenance and clean up costs for the proposed facility against which a credit check may be assessed.

We may want to contact a credit reference agency for a report about your business's finances.

Landfill, Category A mining waste facilities and mining waste facilities for hazardous waste only

How do you plan to make financial provision (to operate a landfill or a mining waste facility you need to show us that you are financially capable of meeting the obligations of closure and aftercare)?

Bonds ☐

Escrow account ☐

Trust fund ☐

Lump sum ☐

Other ☐

Provide a plan of your estimated expenditure on each phase of the landfill or mining waste facility.

Give the document plan reference

Now go to question 3d

3d Management systems (all)

You must have an effective, written management system in place that identifies and reduces the risk of pollution. You may show this by using a certified scheme or your own system.

Your permit requires you (as the operator) to ensure that you manage and operate your activities in accordance with a written management system.

You can find guidance on management systems on our website at www.gov.uk/government/organisations/environment-agency

Tick this box to confirm that you have read the guidance and that your management system will meet our requirements. ☐

What management system will you provide for your regulated facility?

EC Eco-Management and Audit Scheme (EMAS) ☐

EMAS Easy ☐

ISO 14001 ☑

BS 8555 (Phases 1–5) ☐

Acorn ☐

3 Your ability as an operator, continued

Green Dragon ☐

Own management system ☐

Please make sure you send us a summary of your management system with your application.

Document reference or references: Appendix 1 of the Operating Techniques

4 Consultation (fill in 4a to 4c for installations and waste operations and 4d for installations only)

Could the waste operation or installation involve releasing any substance into any of the following?

4a A sewer managed by a sewerage undertaker

No ☑

Yes ☐ Please name the sewerage undertaker

4b A harbour managed by a harbour authority

No ☑

Yes ☐ Please name the harbour authority

4c Direct into relevant territorial waters or coastal waters within the sea fisheries district of a local fisheries committee

No ☑

Yes ☐ Please name the fisheries committee

4d Is the installation on a site for which:

4d1 a nuclear site licence is needed under section 1 of the Nuclear Installations Act 1965?

No ☑

Yes ☐

4d2 a policy document for preventing major accidents is needed under regulation 5 of the Control of Major Accident Hazards Regulations 1999, or a safety report is needed under regulation 7 of those Regulations?

No ☑

Yes ☐

5 Supporting information

5a Provide a plan or plans for the site (but not any mobile plant)

Clearly mark the site boundary or discharge point, or both – see the guidance notes on part B2.

Document reference or references of the plans: ST16653-002

5b Provide the relevant sections of a site condition/baseline report if this applies (see the guidance notes on part B2 for what needs to be marked on the plan)

Document reference of the report: N/A - existing permitted site

If you are applying for an installation, tick the box to confirm that you have sent in a baseline report. ☐

5c Provide a non-technical summary of your application (see the guidance notes on part B2)

Document reference of the summary: Non-Technical Summary

5d Are you applying for an activity that includes the storage of combustible wastes?

This applies to all activities excluding standalone water and groundwater discharges.

Yes ☑ Provide a fire prevention plan (see the guidance notes on part B2). You need to highlight any changes you have made since your pre-application discussions.

No ☐

Document reference of the plan: Fire Prevention Plan

6 Environmental risk assessment

Provide an assessment of the risks each of your proposed regulated facilities poses to the environment. The risk assessment must follow the methodology set out in 'Risk assessments for your environmental permit' at https://www.gov.uk/guidance/risk-assessments-for-your-environmental-permit or an equivalent method.

Document reference for the assessment | Amenity and Accident Risk Assessment

7 How to contact us

If you need help filling in this form, please contact the person who sent it to you or contact us as shown below.

General enquiries: 03708 506 506 (Monday to Friday, 8am to 6pm)

Textphone: 03702 422 549 (Monday to Friday, 8am to 6pm)

Email: enquiries@environment-agency.gov.uk

Website: www.gov.uk/government/organisations/environment-agency

If you are happy with our service, please tell us. It helps us to identify good practice and encourages our staff. If you're not happy with our service, please tell us how we can improve it.

Please tell us if you need information in a different language or format (for example, in large print) so we can keep in touch with you more easily.

Feedback

(You don't have to answer this part of the form, but it will help us improve our forms if you do.)

We want to make our forms easy to fill in and our guidance notes easy to understand. Please use the space below to give us any comments you may have about this form or the guidance notes that came with it.

How long did it take you to fill in this form?

We will use your feedback to improve our forms and guidance notes, and to tell the Government how regulations could be made simpler.

Would you like a reply to your feedback?

Yes please ☐

No thank you ☐

Crystal Mark 19103 Clarity approved by Plain English Campaign

For Environment Agency use only

Date received (DD/MM/YYYY)

Our reference number

Payment received?

No ☐

Yes ☐ Amount received

£

Plain English Campaign's Crystal Mark does not apply to appendix 1.

Appendix 1 – Low impact installation checklist (see the guidance notes on part B2)

Installation reference				
Condition	Response			Do you meet this?
A – Management techniques	Provide references to show how your application meets A.			Yes ☐ No ☐
	References			
B – Aqueous waste	Effluent created		m^3/day	Yes ☐ No ☐
C – Abatement systems	Provide references to show how your application meets C.			Yes ☐ No ☐
	References			
D – Groundwater	Do you plan to release any hazardous substances or non-hazardous pollutants into the ground?		Yes ☐ No ☐	Yes ☐ No ☐
E – Producing waste	Hazardous waste		Tonnes per year	Yes ☐ No ☐
	Non-hazardous waste		Tonnes per year	
F – Using energy	Peak energy consumption		MW	Yes ☐ No ☐
G – Preventing accidents	Do you have appropriate measures to prevent spills and major releases of liquids? (See 'How to comply'.)		Yes ☐ No ☐	Yes ☐ No ☐
	Provide references to show how your application meets G.			
	References			
H – Noise	Provide references to show how your application meets H.			Yes ☐ No ☐
	References			
I – Emissions of polluting substances	Provide references to show how your application meets I.			Yes ☐ No ☐
	References			
J – Odours	Provide references to show how your application meets J.			Yes ☐ No ☐
	References			
K – History of keeping to the regulations	Say here whether you have been involved in any enforcement action as described in Compliance History Appendix 1 explanatory notes.		Yes ☐ No ☐	

Form B3

Application for an environmental permit Part B3 – New bespoke installation permit

If you are applying for a new bespoke permit for an installation, fill in this part of the form, together with parts A, B2 and F1. Please check that this is the latest version of the form available from our website.

Please read through this form and the guidance notes that came with it.

The form can be:

1 Saved onto a computer and then filled in. Please note that the form follows a logic that means questions will open or stay closed depending on a previous answer. So you may not be able to enter text in some boxes.

2 Printed off and filled in by hand. Please write clearly in the answer spaces.

It will take less than three hours to fill in this part of the application form.

Contents

1 What activities are you applying for?

Fill in Table 1a below with details of all the activities listed in schedule 1 of the Environmental Permitting Regulations (EPR) and all directly associated activities (DAAs) (in separate rows) that you propose to carry out at the installation.

Fill in a separate table for each installation you are applying for. Use a separate sheet if you have a long list and send it to us with your application form. Tell us below the reference you have given the document.

Document reference

Table 1a – Types of activities

Schedule 1 listed activities						
Installation name	Schedule 1 references (See note 1)	Description of the Activity (See note 2)	Activity capacity (See note 3)	Annex I (D codes) and Annex II (R codes) and descriptions	Hazardous waste treatment capacity (if this applies) (See note 3)	Non-hazardous waste treatment capacity (if this applies) (See note 3)
Add extra rows if you need them. If you do not have enough room go to the line below or send a separate document and give us the document reference here	Put your main activity first			For installations that take waste only	For installations that take waste only	For installations that take waste only
Battery Treatment	5.6 Part A (1) (a)	Storage	6,000.00	R13		
Facility	5.3 Part A (1) (a) (ii)	Physico-chemical treatmt	100.00	R3, R4, R5, R13, D15	100.00	

Directly associated activities (See note 4)	
Name of DAA	Description of the DAA (please identify the schedule 1 activity it serves)
Add extra rows if you need them	
For installations that take waste	Total storage capacity (See note 5 below)
	Annual throughput (tonnes each year) 25,000.00

1 What activities are you applying for?, continued

Notes

1 Quote the section number, part A1 or A2 or B, then paragraph and sub paragraph number as shown in part 2 of schedule 1 to the regulations.

2 Use the description from schedule 1 of the regulations. Include any extra detail that you think would help to accurately describe what you want to do.

3 By 'capacity', we mean:
- the total incineration capacity (tonnes every hour) for waste incinerators;
- the total landfill capacity (cubic metres) for landfills;
- the total treatment capacity (tonnes each day) for waste treatment;
- the total storage capacity (tonnes) for waste storage operations;
- the processing and production capacity for manufacturing operations; or
- the thermal input capacity for combustion activities.

4 Fill this in as a separate line and give an accurate description of any other activities associated with your schedule 1 activities. You cannot have DAAs as part of a mobile plant application.

5 By 'total storage capacity', we mean the maximum amount of waste, in tonnes, you store on the site at any one time.

Types of waste accepted

For those installations that take waste, for each line in Table 1a (including DAAs), fill in a separate document to list those types of waste you will accept onto the site for that activity. Give the List of Wastes catalogue code and description (search for 'Technical guidance on how to assess and classify waste' at www.gov.uk/environment-agency). If you need to exclude wastes from your activity or facility by restricting the description, quantity, physical nature, hazardous properties, composition or characteristic of the waste, include these in the document. Send it to us with your application form.

Please provide the reference for each document.

You can use Table 1b as a template.

If you want to accept any waste with a code ending in *99*, you must provide more information and a full description in the document.

Document reference for this extra information

Table 1b – Template example – types of waste accepted and restrictions

Waste code	Description of waste
Example 02 01 08* 06 01 02*	Example Agrochemical waste containing hazardous substances Hydrochloric acid

2 Emissions to air, water and land

Fill in Table 2 below with details of the emissions that result from the operating techniques at each of your installations.

Fill in one table for each installation.

Table 2 – Emissions (releases)

Installation name	Battery Treatment Facility			
Point source emissions to air				
Emission point reference and location	Source	Parameter	Quantity	Unit
none				
Point source emissions to water (other than sewers)				

2 Emissions to air, water and land, continued

Table 2 – Emissions, continued

Emission point reference and location	Source	Parameter	Quantity	Unit
none				
Point source emissions to sewers, effluent treatment plants or other transfers off site				
Emission point reference and location	Source	Parameter	Quantity	Unit
none				
Point source emissions to land				
Emission point reference and location	Source	Parameter	Quantity	Unit
none				

Supporting information

3 Operating techniques

3a Technical standards

Fill in Table 3a for each activity at the installation you have referred to in Table 1a above and list the relevant technical guidance note (TGN) or notes you are planning to use. If you are planning to use the standards set out in the TGN, there is no need to justify using them.

You must justify your decisions in a separate document if:

- there is no technical standard;
- the technical guidance provides a choice of standards; or
- you plan to use another standard.

This justification could include a reference to the Environmental Risk Assessment provided in part B2 (General Bespoke Permit) of the application form.

The documents in Table 3a should summarise the main measures you use to control the main issues identified in your risk assessment (search for 'Risk assessment for your environmental permit' at www.gov.uk/environment-agency) or technical guidance. For each of the activities listed in Table 3a, describe the type of operation and the options you have chosen for controlling emissions from your process.

3 Operating techniques, continued

Table 3a – Technical standards

Note: Fill in a separate table for each activity at the installation.

Installation name	Battery Treatment Facility	
Schedule 1 activity or directly associated activity description	Relevant technical guidance or best available techniques as described in BAT conclusions under IED (see footnote below).	Document reference (if appropriate)
5.6 A(1)(a) Temporary storage of haz waste	S5.06	Assessment of Best Available
5.3 A(1)(a)(ii) Recovery/Disposal of haz waste	Batteries Directive	Techniques

*Directive 2010/75/EU of the European Parliament and of the Council of 24 November 2010 on industrial emissions (integrated pollution prevention and control)

If appropriate, use block diagrams to help describe the operation and process. Give the document references you use for each diagram and description.

Document reference: Operating Techniques

3b General requirements

Fill in a separate Table 3b for each installation.

Table 3b – General requirements

Installation name	Battery Treatment Facility
If the TGN or your risk assessment shows that emissions of substances not controlled by emission limits are an important issue, send us your plan for managing them	Document reference or references n/a
If the TGN or your risk assessment shows that odours are an important issue, send us your odour management plan	Document reference or references n/a
If the TGN or your risk assessment shows that noise or vibration are important issues, send us your noise or vibration management plan (or both)	Document reference or references n/a

Search for 'Risk assessment for your environmental permit' at www.gov.uk/environment-agency.

3c Types and amounts of raw materials

Fill in Table 3c for all schedule 1 activities. Fill in a separate table for each installation.

Table 3c – Types and amounts of raw materials

Installation name		Battery Treatment Facility		
Capacity (See note 1 below)		25,000.00		
Schedule 1 activity	Description of raw material and composition material	Maximum amount (tonnes) (See note 2 below)	Annual throughput (tonnes each year)	Description of how the raw material is used including any main hazards (include safety information sheets)
5.6 A(1)(a)	see Assessment of Best			
5.3 A(1)(a)(ii)	Available Techniques			

Notes

1 By 'capacity', we mean the total storage capacity (tonnes) or total treatment capacity (tonnes each day).
2 By 'maximum amount', we mean the maximum amount of raw materials on your site at any one time.

3 Operating techniques, continued

Use a separate sheet if you have a long list of raw materials, and send it to us with your application form.

Please also provide the document reference you have given the extra sheet.

Document reference

3d Information for specific sectors

For some of the sectors, we need more information to be able to set appropriate conditions in the permit.

This is as well as the information you may provide in sections 5, 6 and 7.

For those activities listed below, you must answer the questions in the related document.

Table 3d – Questions for specific sectors

Sector	Appendix
Combustion	See the questions in appendix 1
Chemicals	See the questions in appendix 2
Intensive farming	See the questions in appendix 3
Clinical waste	See the questions in appendix 4
Hazardous and non-hazardous waste recovery and disposal	See the questions in appendix 5
Incinerating waste	See the questions in appendix 6
Landfill	See the questions in appendix 7

General information

4 Monitoring

4a Describe the measures you use for monitoring emissions by referring to each emission point in Table 2 above

You should also describe any environmental monitoring. Tell us:

- how often you use these measures;
- the methods you use; and
- the procedures you follow to assess the measures.

Document reference for this information: Operating Techniques

4b Point source emissions to air only

Provide an assessment of the sampling locations you have used to measure point source emissions to air. The assessment must use M1 (search for 'M1 sampling requirements for stack emission monitoring' at www.gov.uk/environment-agency).

Document reference of the assessment: no point source emissions to air

5 Environmental impact assessment

5a Have your proposals had an environmental impact assessment under Council Directive 85/337/EEC of 27 June 1985 [Environmental Impact Assessment] (EIA)?

No ☑ Now go to section 6

Yes ☐ Please provide a copy of the environmental statement and, if the procedure has been completed:

- a copy of the planning permission; and
- the committee report and decision on the EIA.

Document reference for the copy

6 Resource efficiency and climate change

If the site is a landfill, you only need to fill in this section if the application includes landfill gas engines.

6a Describe the basic measures for improving how energy efficient your activities are

Document reference of this description: Assessment of Best Available Techniques

6b Provide a breakdown of any changes to the energy your activities use and create

Document reference of the breakdown: Assessment of Best Available Techniques

6 Resource efficiency and climate change, continued

6c Have you entered into, or will you enter into, a climate change levy agreement?

No ☑ Describe the specific measures you use for improving your energy efficiency.

Document reference of this description: Assessment of Best Available Techniques

Yes ☐ Please give the date you entered (or the date you expect to enter) into the agreement (DD/MM/YYYY)

Please also provide documents that prove you are taking part in the agreement.

Document reference of the proof you are providing

6d Tell us about, and justify your reasons for, the raw and other materials, other substances and water you will use

Document reference of this document: Assessment of Best Available Techniques

6e Describe how you avoid producing waste in line with Council Directive 2008/98/EC on waste

If you produce waste, describe how you recover it.

If it is technically and financially impossible to recover the waste, describe how you dispose of it while avoiding or reducing any effect it has on the environment.

Document reference for your description: Assessment of Best Available Techniques

7 Installations that include a combustion plant (excluding waste incinerators)

Is the aggregated net thermal input of your combustion plant more than 20 MW?

No ☐

Yes ☐ Please go to Appendix 1 question 11.

8 How to contact us

If you need help filling in this form, please contact the person who sent it to you or contact us as shown below.

General enquiries: 03708 506 506 (Monday to Friday, 8am to 6pm)

Textphone: 03702 422 549 (Monday to Friday, 8am to 6pm)

Email: enquiries@environment-agency.gov.uk

Website: www.gov.uk/environment-agency

If you are happy with our service, please tell us. It helps us to identify good practice and encourages our staff. If you're not happy with our service, please tell us how we can improve it.

Please tell us if you need information in a different language or format (for example, in large print) so we can keep in touch with you more easily.

Feedback

(You don't have to answer this part of the form, but it will help us improve our forms if you do.)

We want to make our forms easy to fill in and our guidance notes easy to understand. Please use the space below to give us any comments you may have about this form or the guidance notes that came with it.

How long did it take you to fill in this form?

We will use your feedback to improve our forms and guidance notes, and to tell the Government how regulations could be made simpler.

Would you like a reply to your feedback?

Yes please ☐

No thank you ☐

For Environment Agency use only

Date received (DD/MM/YYYY)

Our reference number

Payment received?

No ☐

Yes ☐ Amount received

£

Plain English Campaign's Crystal Mark does not apply to appendices 1 to 7.

Appendix 1 – Specific questions for the combustion sector

1 Identify the type of fuel burned in your combustion units (including when your units are started up, shut down and run as normal). If your units are dual fuelled (that is, use two types of fuel), list both the fuels you use

Fill in a separate table for each installation.

Installation reference			
Type of fuel	When run as normal	When started up	When shut down
Coal			
Gas oil			
Heavy fuel oil			
Natural gas			
WID waste			
Biomass (see notes 1 and 2 below)			
Biomass (see notes 1 and 2 below)			
Biomass (see notes 1 and 2 below)			
Biomass (see notes 1 and 2 below)			
Biomass (see notes 1 and 2 below)			
Other			

Notes

1 Not covered by Industrial Emissions Directive 2010/75/EU.
2 'Biomass' is referred to in www.opsi.gov.uk/si/si2002/20020914.htm.

Give extra information if it helps to explain the fuel you use.

Document reference

2 Give the composition range of any fuels you are currently allowed to burn in your combustion plant

Fill in a separate table for each installation.

Fuel use and analysis					
Installation reference					
Parameter	Unit	Fuel 1	Fuel 2	Fuel 3	Fuel 4
Maximum percentage of gross thermal input	%				
Moisture	%				
Ash	% wt/wt dry				
Sulphur	% wt/wt dry				
Chlorine	% wt/wt dry				
Arsenic	% wt/wt dry				
Cadmium	% wt/wt dry				
Carbon	% wt/wt dry				
Chromium	% wt/wt dry				
Copper	% wt/wt dry				
Hydrogen	% wt/wt dry				
Lead	% wt/wt dry				
Mercury	% wt/wt dry				
Nickel	% wt/wt dry				
Nitrogen	% wt/wt dry				
Oxygen	% wt/wt dry				
Vanadium	mg/kg dry				
Zinc	mg/kg dry				
Net calorific value	MJ/kg				

Appendix 1 – Specific questions for the combustion sector, continued

3 If NOx factors are necessary for reporting purposes (that is, if you do not need to monitor emissions), please provide the factors associated with burning the relevant fuels

Fill in a separate table for each installation.

Installation reference	
Fuel	NOx factor (kgt^{-1})
Fuel 1	
Fuel 2	
Fuel 3	
Fuel 4	

Note: kgt^{-1} means kilograms of nitrogen oxides released for each tonne of fuel burned.

4 Will your combustion plant be subject to Chapter III of the Industrial Emissions Directive 2010/75/EU? (see Government guidance)

No ☐ Now fill in part F

Yes ☐

5 Is your plant

an existing plant (a plant licensed before 1 July 1987)? ☐

a new plant (a plant licensed on or after 1 July 1987 but before 27 November 2002, or a plant for which an application was made before 27 November 2002 and which was put into operation before 27 November 2003)? ☐

or

a new-new plant (a plant for which an application was made on or after 27 November 2002)? ☐

6 If you run more than one type of plant or a number of the same type of plant on your installation, please list them in the table below

Fill in a separate table for each installation.

Installation reference	
Type of plant	Number within installation
Existing	
New	
New-new	
Gas turbine (group A)	
Gas turbine (group B)	

7 If you run an existing plant, have you submitted a declaration for the 'limited life derogation' set out in Article 33 of Chapter III of the Industrial Emissions Directive?

No ☐ Now go to section 9

Yes ☐

8 Have you subsequently withdrawn your declaration?

No ☐

Yes ☐

9 List the existing large combustion plants (LCPs) which have annual mass allowances under the National Emission Reduction Plan (NERP), and those with emission limit values (ELVs) under the LCPD

Installation reference	
LCPs under NERP	LCPs with ELVs

Appendix 1 – Specific questions for the combustion sector, continued

10 Do you meet the monitoring requirements of Chapter III of the Industrial Emissions Directive?

Yes ☐

Document reference number

11 Have you carried out a cost–benefit assessment (CBA) of opportunities for cogeneration (combined heat and power) or district heating under Article 14 of the Energy Efficiency Directive?

No ☐ Please provide supporting evidence of why a CBA is not required (for example, an agreement from us)

Document reference number of this evidence

Yes ☐ Please submit a copy of your CBA

Document reference number of the CBA

12 Does your installation need to be combined heat and power-ready (CHP-ready)?

No ☐ Please provide supporting evidence of why a CHP-ready assessment is not required (for example, an agreement from us)

Document reference number of this evidence

Yes ☐ Please provide a copy of your CHP-ready assessment

Document reference number of the CHP-ready assessment

Appendix 2 – Specific questions for the chemical sector

1 Please provide a technical description of your activities

The description should be enough to allow us to understand:

- the process;
- the main plant and equipment used for each process;
- all reactions, including significant side reactions (that is, the chemistry of the process);
- the material mass flows (including by products and side streams) and the temperatures and pressures in major vessels;
- the all emission control systems (both hardware and management systems), for situations which could involve releasing a significant amount of emissions – particularly the main reactions and how they are controlled;
- a comparison of the indicative BATs and benchmark emission levels standards: technical guidance notes (TGNs); additional guidance 'The production of large volume organic chemicals' (EPR 4.01); 'Speciality organic chemicals sector' (EPR 4.02); 'Inorganic chemicals sector' (EPR 4.03); and best available techniques reference documents (BREFs) for the chemical sector.

Document reference

2 If you are applying for a multi-purpose plant, do you have a multi-product protocol in place to control the changes?

No ☐

Yes ☐ Provide a copy of your protocol to accompany this application

Document reference

3 Does Chapter V of the Industrial Emissions Directive (IED) apply to your activities?

No ☐

Yes ☐ Fill in the following

3a List the activities which are controlled under the IED

Installation reference	
Activities	

3b Describe how the list of activities in question 3a above meets the requirements of the IED

Document reference

Appendix 3 – Specific questions for the intensive farming sector

1 For each type of livestock, tell us the number of animal places you are applying for

Installation reference	
Type of livestock	Number of places

2 Is manure or slurry exported from the site?

No ☐

Yes ☐

3 Is manure or slurry spread on the site?

No ☐

Yes ☐

Appendix 4 – Specific questions for the clinical waste sector

If you are applying for an activity covered by Chapter IV of the Industrial Emissions Directive and wish to accept clinical waste you should fill in questions 1, 2 and 3 of this appendix.

Note: If your procedures are fully in line with the standards set out in 'Technical guidance for managing clinical waste' (EPR 5.07) then you should tick the 'yes' box and provide the procedure reference from EPR 5.07. There is no need for you to supply a copy of the procedure.

1 Are pre-acceptance procedures in place that are fully in line with the appropriate measures set out in section 2.2 of EPR 5.07 and which are used to assess a waste enquiry before it is accepted at the installation?

No ☐ Provide justification for departure from EPR 5.07 and submit a copy of your procedures

Document reference

Yes ☐ EPR 5.07 procedure reference

2 Are waste acceptance procedures in place that are fully in line with the appropriate measures set out in section 2.2 of EPR 5.07, and which are used to cover issues such as loads arriving and being inspected, sampling waste, rejecting waste, and keeping records to track waste?

No ☐ Provide justification for departure from EPR 5.07 and submit a copy of your procedures

Document reference

Yes ☐ EPR 5.07 procedure reference

3 Are waste storage, handling and dispatch procedures, and infrastructure in place that are fully in line with the appropriate measures set out in section 3.2 of EPR 5.07?

No ☐ Provide justification for departure from EPR 5.07 and submit a copy of your procedures

Document reference

Yes ☐ EPR 5.07 procedure reference

4 Are monitoring procedures in place that are fully in line with the appropriate measures set out in section 3.3 of EPR 5.07?

No ☐ Provide justification for departure from EPR 5.07 and submit a copy of your procedures

Document reference

Yes ☐ EPR 5.07 procedure reference

5 Are you proposing to either

- accept an additional waste not included in Table 2.1 of section 2.1 of EPR 5.07, or
- apply a permitted activity to a waste other than that identified for that waste in Table 2.1?

No ☐

Yes ☐ Provide justification

Document reference

6 Please provide a summary description of the treatment activities undertaken on the installation. This should cover the general principles set out in section 2.1.4 of EPR 5.07

Document reference for summary

7 Please provide layout plans detailing the location of each treatment plant and main plant items and process flow diagrams for the treatment plant

Document reference

Appendix 5 – Specific questions for the hazardous and non-hazardous waste recovery and disposal sector

Note: If your procedures are fully in line with the standards set out in 'Recovery and disposal of hazardous and non-hazardous waste' (SGN 5.06) then you should tick the 'yes' box and provide the procedure reference from SGN 5.06. There is no need for you to supply a copy of the procedure.

1 Are pre-acceptance procedures in place that are fully in line with the appropriate measures set out in section 2.1.1 of SGN 5.06, and which are used to assess a waste enquiry before it is accepted at the installation?

No ☐ Provide justification for departure from SGN 5.06 and submit a copy of your procedures

Document reference

Yes ☑ SGN 5.06 procedure reference: Assessment of Best Available Techniques

2 Are waste acceptance procedures in place that are fully in line with the appropriate measures set out in section 2.1.2 of SGN 5.06, and which are used to cover issues such as loads arriving and being inspected, sampling waste, rejecting waste, and keeping records to track waste?

No ☐ Provide justification for departure from SGN 5.06 and submit a copy of your procedures

Document reference

Yes ☑ SGN 5.06 procedure reference: Assessment of Best Available Techniques

3 Are waste storage procedures and infrastructure in place that are fully in line with the appropriate measures set out in section 2.1.3 of SGN 5.06?

No ☐ Provide justification for departure from SGN 5.06 and submit a copy of your procedures

Document reference

Yes ☑ SGN 5.06 procedure reference: Assessment of Best Available Techniques

4 Provide a layout plan giving details of where the installation is based, the infrastructure in place (including areas and structures for separately storing types of waste which may be dangerous to store together) and capacity of waste storage areas and structures

Document reference: ST16653-003 Site Layout Plan

5 Provide a summary of the treatment activities carried out on the installation. This should cover the general principles set out in section 2.1.4 of SGN 5.06 and the specific principles set out in sections 2.1.5 to 2.1.15 as appropriate of SGN 5.06

Document reference for summary: Non-Technical Summary

6 Provide layout plans giving details of where each treatment plant is based, the main items at each plant, and process flow diagrams for the treatment plant

Document reference or references: Operating Techniques

ST16653-003 Site Layout Plan

Appendix 6 – Specific questions for the waste incineration sector

If you are proposing to accept clinical waste please also fill in questions 1, 2 and 3 of appendix 4 above.

1a Do you run incineration plants as defined by Chapter IV of the Industrial Emissions Directive (IED)?

No ☑ You do not need to answer any other questions in this appendix

Yes ☐ IED applies

1b Are you subject to IED as an incinerator or co-incinerator?

As an incinerator ☐

As a co-incinerator ☐

2 Do any of the installations contain more than one incineration line?

No ☐ Now go to section 4

Yes ☐

3 How many incineration lines are there within each installation?

Fill in a separate table for each installation

Installation reference	
Number of incineration lines within the installation	
Reference identifiers for each line	

You must provide the information we ask for in questions 4, 5 and 6 below in separate documents. The information must at least include all the details set out in section 2 ('Key Issues') of S5.01 'Incineration of waste: additional guidance' (under the subheading 'European legislation and your application for an EP Permit').

4 Describe how the plant is designed, equipped and will be run to make sure it meets the requirements of IED, taking into account the categories of waste which will be incinerated

Document reference

5 Describe how the heat created during the incineration and co-incineration process is recovered as far as possible (for example, through combined heat and power, creating process steam or district heating)

Document reference

6 Describe how you will limit the amount and harmful effects of residues and describe how they will be recycled where this is appropriate

Document reference

For each line identified in question 3, answer questions 7 to 13 below

Question 3 identifier, if necessary

7 Do you want to take advantage of the Article 45 (1)(f) allowance (see below) if the particulates, CO or TOC continuous emission monitors (CEM) fail?

No ☐

Yes ☐ This article allows 'abnormal operation' of the incineration plant under certain circumstances when the CEM for releases to air have failed. Annex VI, Part 3(2) sets maximum half hourly average release levels for particulates (150mg/m^3), CO (normal ELV) and TOC (normal ELV) during abnormal operation.

Describe the other system you use to show you keep to the requirements of Article 13(4) (for example, using another CEM, providing a portable CEM to insert if the main CEM fails, and so on).

Appendix 6 – Specific questions for the waste incineration sector, continued

8 Do you want to replace continuous HF emission monitoring with periodic hydrogen fluoride (HF) emission monitoring by relying on continuous hydrogen chloride (HCl) monitoring as allowed by IED Annex VI, Part 6 (2.3)?

Under this you do not have to continuously monitor emissions for hydrogen fluoride if you control hydrogen chloride and keep it to a level below the HCl ELVs.

No ☐

Yes ☐ Please give reasons for doing this

9 Do you want to replace continuous water vapour monitoring with pre-analysis drying of exhaust gas samples, as allowed by IED Annex VI, Part 6 (2.4)?

Under this you do not have to continuously monitor the amount of water vapour in the air released if the sampled exhaust gas is dried before the emissions are analysed.

No ☐

Yes ☐ Please give your reasons for doing this

10 Do you want to replace continuous hydrogen chloride (HCl) emission monitoring with periodic HCl emission monitoring, as allowed by IED Annex VI, Part 6 (2.5), first paragraph?

Under this you do not have to continuously monitor emissions for hydrogen chloride if you can prove that the emissions from this pollutant will never be higher than the ELVs allowed.

No ☐

Yes ☐ Please give your reasons for doing this

Appendix 6 – Specific questions for the waste incineration sector, continued

11 Do you want to replace continuous HF emission monitoring with periodic HF emission monitoring, as allowed by IED Annex VI, Part 6 (2.5), first paragraph?

Under this you do not have to continuously monitor emissions for hydrogen fluoride if you can prove that the emissions from this pollutant will never be higher than the ELVs allowed.

No ☐

Yes ☐ Please give your reasons for doing this

12 Do you want to replace continuous SO_2 emission monitoring with periodic sulphur dioxide (SO_2) emission monitoring, as allowed by IED Annex VI, Part 6 (2.5), first paragraph?

Under this you do not have to continuously monitor emissions for sulphur dioxide if you can prove that the emissions from this pollutant will never be higher than the ELVs allowed.

No ☐

Yes ☐ Please give your reasons for doing this

13 If your plant uses fluidised bed technology, do you want to apply for a derogation of the CO WID ELV to a maximum of 100 mg/m^3 as an hourly average, as allowed by IED Annex VI, Part 3?

No ☐

Does not apply ☐

Yes ☐ Please give your reasons for doing this

Appendix 6 – Specific questions for the waste incineration sector, continued

14 Have you carried out a cost–benefit assessment (CBA) of opportunities for cogeneration (combined heat and power) or district heating under Article 14 of the Energy Efficiency Directive?

No ☐ Please provide supporting evidence of why a CBA is not required (for example, an agreement from us)

Document reference number of this evidence

Yes ☐ Please submit a copy of your CBA

Document reference number of the CBA

15 Does your installation need to be combined heat and power-ready (CHP-ready)?

No ☐ Please provide supporting evidence of why a CHP-ready assessment is not required (for example, an agreement from us)

Document reference number of this evidence

Yes ☐ Please provide a copy of your CHP-ready assessment

Document reference number of the CHP-ready assessment

Appendix 7 – Specific questions for the landfill sector

1 Provide your Environmental Setting and Installation Design (ESID) report

Document reference

2 Provide your hydrogeological risk assessment (HRA) for the site

Document reference

3 Provide your stability risk assessment (SRA) for the site

Document reference

4 Provide your landfill gas risk assessment (LFGRA) for the site

Document reference

We have developed templates for these four reports which can be found at
https://www.gov.uk/government/collections/environmental-permitting-landfill-sector-technical-guidance

5 Provide your proposed plan for closing the site and your procedures for looking after the site once it has closed

Document reference

Form B4

Application for an environmental permit
Part B4 – New bespoke waste operation permit

Fill in this part of the form, together with parts A, B2 and F1, if you are applying for a new bespoke permit for a waste operation. Please check that this is the latest version of the form available from our website.

Please read through this form and the guidance notes that came with it.

The form can be:

1 Saved onto a computer and then filled in. Please note that the form follows a logic that means questions will open or stay closed depending on a previous answer. So you may not be able to enter text in some boxes.

2 Printed off and filled in by hand. Please write clearly in the answer spaces.

It will take less than three hours to fill in this part of the application form.

Contents

1 What waste operations are you applying for?

Fill in Table 1a below with details of what you are applying for.

Fill in a separate table for each waste operation you are applying for. Use a separate sheet if you have a long list and send it to us with your application form. Tell us below the reference you have given the extra sheet.

Document reference for the extra sheet

Types of waste accepted

For each line in Table 1a, fill in a separate document to list those wastes you will accept on the site for that operation. Give the List of Wastes catalogue code (search for 'Technical guidance on how to assess and classify waste' at www.gov.uk/government/organisations/environment-agency). If you need to exclude wastes from your activity or facility by restricting the description, quantity, physical nature, hazardous properties, composition or characteristic of the waste, include these in the document. Send it to us with your application form.

Table 1a – Waste operations which do not form part of an installation

Name of the waste operation	Description of the waste operation	Annex I (D codes) and Annex II (R codes) and descriptions	Hazardous waste treatment capacity (if this applies). See note 1	Non-hazardous waste treatment capacity (if this applies). See note 1
Add extra rows if you need them. If you do not have enough room go to the line below or send a separate document and give us the document reference here	Use the description from the guidance. Include any extra detail that you think would help to accurately describe what you want to do			
Treatment of alkaline batteries	Recovery of non-hazardous wastes	R3, R4, R5, R13		32.00
For all waste operations	Total storage capacity (see note 2)			6,000.00
	Annual throughput (tonnes each year)			25,000.00

Notes

1 By 'capacity', we mean the total landfill capacity (cubic metres), the total deposit for recovery capacity (cubic metres), the total treatment capacity (tonnes each day) for waste treatment and the total storage capacity (tonnes) for waste storage operations.

2 By 'total storage capacity', we mean the maximum amount of waste in tonnes you store on the site at any one time.

1 What waste operations are you applying for?, continued

Please provide the document reference for each document. You can use Table 1b as a template.

If you want to accept any wastes with a code ending in 99, you must provide more information and a full description in the document.

Document reference for this document

Table 1b – Template example – types of waste accepted and restrictions

Waste code	Description of waste
Example 02 01 08* 06 01 02*	Example Agrochemical waste containing hazardous substances Hydrochloric acid

1c Deposit for recovery purposes (see Appendix 4 and guidance notes on part B4)

Are you applying for a waste recovery activity involving the permanent deposit of waste on land for construction or land reclamation restoration or improvement?

No ☑ Go to question 2

Yes ☐

Have we advised you during pre-application discussions that we believe the activity is waste recovery?

No ☐ Go to question 2

Yes ☐

Have there been any changes to your proposal since this discussion?

No ☐

Yes ☐

Please send us a copy of your waste recovery plan that complies with our guidance at https://www.gov.uk/guidance/waste-recovery-plans-and-permits. You need to highlight any changes you have made since your pre-application discussions. Also give us the reference number of the document with your justification.

Please note that there is an additional charge for the assessment of a waste recovery plan that must be submitted as part of this application. For the charge see https://www.gov.uk/topic/environmental-management/environmental-permits.

Document reference

2 Emissions to air, water and land

Fill in Table 2 below with details of the emissions that result from the operating techniques at each of your waste operations.

Fill in one table for each waste operation.

Table 2 – Emissions

Name of the waste operation	Battery Treatment Facility			
Point source emissions to air				
Emission point reference and location	Source	Parameter	Quantity	Unit
none				
Point source emissions to water (other than sewers)				
Emission point reference and location	Source	Parameter	Quantity	Unit
none				

2 Emissions to air, water and land, continued

Point source emissions to sewers, effluent treatment plants or other transfers off site				
Emission point reference and location	Source	Parameter	Quantity	Unit
none				
Point source emissions to land				
Emission point reference and location	Source	Parameter	Quantity	Unit
none				

Supporting information

3 Operating techniques

3a Technical standards

Fill in Table 3a for each operation you refer to in Table 1a above and list the relevant technical guidance note (TGN) or notes you are planning to use. If you are planning to use the standards set out in the TGN, there is no need to justify using them.

You must justify your decisions in a separate document if:

- there is no technical standard;
- the technical guidance provides a choice of standards; or
- you plan to use another standard.

This justification could include a reference to the Environmental Risk Assessment provided in part B2 of the application form.

The documents should summarise the main measures you use to control the main issues identified in your risk assessment (search for 'Risk assessment for your environmental permit' at www.gov.uk/government/organisations/environment-agency) or technical guidance. For each of the activities listed in Table 3a, describe the type of operation and the options you have chosen for controlling emissions from your process.

Table 3a – Technical standards

Fill in a separate table for each waste operation.

Name of waste operation Battery Treatment Facility		
Description of waste operation	Relevant technical guidance note	Document reference (if appropriate)
Recovery of non-haz wastes	Core Guidance	Operating Techniques
	Batteries Directive	
	S5.06	Assessment of Best Available
		Techniques

In all cases, describe the type of facility or operation you are applying for and, if appropriate, use block diagrams to help describe the process. Provide the document references for the description.

Document reference for the description: Appendix 3 to the Operating Techniques

3 Operating techniques, continued

3b General requirements

Fill in a separate Table 3b for each waste operation.

Table 3b – General requirements

Name of the waste operation	Battery Treatment Facility
If the TGN or your risk assessment shows that emissions of substances not controlled by emission limits are an important issue, send us your plan for managing them	Document reference or references n/a
If the TGN or your risk assessment shows that odours are an important issue, send us your odour management plan **If your activity type is listed in the guidance document 'Control and monitor emissions for your environmental permit' as needing an odour management plan, or your risk assessment shows that odours are an important issue, you need to send us your odour management plan.**	Document reference or references n/a
If the TGN or your risk assessment shows that noise or vibration are important issues, send us your noise or vibration management plan (or both)	Document reference or references n/a

We may need to ask for management plans or risk assessments in other circumstances based on our regulatory experience. If you are unsure as to whether you need to submit a management plan with your application, please discuss this with the Environment Agency prior to submission.

Search for 'Risk assessment for your environmental permit' at www.gov.uk/government/organisations/environment-agency.

3c Information for specific sectors

For some of the sectors, we need more information to be able to set appropriate conditions in the permit. This is as well as the information you may provide in sections 5, 6 and 7. For those activities listed below, you must answer the questions in the related document.

Table 3c – Questions for specific sectors

Sector	Appendix
Clinical waste	See the questions in appendix 1
Disposing of and recovering hazardous waste	See the questions in appendix 2
Recovery to land for agricultural benefit of compost like outputs from the treatment of mixed municipal solid wastes	See the questions in appendix 3
Inert waste landfill and deposit of waste on land for construction, land reclamation, restoration or improvement	See the questions in appendix 4

General information

4 Monitoring

4a Describe the measures you use for monitoring emissions by referring to each emission point in Table 2 above

You should also describe any environmental monitoring. Tell us:

- how often you use these measures;
- the methods you use; and
- the procedures you follow to assess the measures.

Document reference for this information: n/a

4b Point source emissions to air only

Provide an assessment of the sampling locations used to measure point source emissions to air. The assessment must use M1. (Search for 'M1 sampling requirements for stack emission monitoring' at www.gov.uk/government/organisations/environment-agency.)

Document reference for the assessment:

5 How to contact us

If you need help filling in this form, please contact the person who sent it to you or contact us as shown below.

General enquiries: 03708 506 506 (Monday to Friday, 8am to 6pm)

Textphone: 03702 422 549 (Monday to Friday, 8am to 6pm)

Email: enquiries@environment-agency.gov.uk

Website: www.gov.uk/government/organisations/environment-agency

If you are happy with our service, please tell us. It helps us to identify good practice and encourages our staff. If you're not happy with our service, please tell us how we can improve it.

Please tell us if you need information in a different language or format (for example, in large print) so we can keep in touch with you more easily.

Feedback

(You don't have to answer this part of the form, but it will help us improve our forms if you do.)

We want to make our forms easy to fill in and our guidance notes easy to understand. Please use the space below to give us any comments you may have about this form or the guidance notes that came with it.

How long did it take you to fill in this form?

We will use your feedback to improve our forms and guidance notes, and to tell the Government how regulations could be made simpler.

Would you like a reply to your feedback?

Yes please ☐

No thank you ☐

Crystal Mark 19105 Clarity approved by Plain English Campaign

For Environment Agency use only

Date received (DD/MM/YYYY)

Our reference number

Payment received?

No ☐

Yes ☐ Amount received

£

Plain English Campaign's Crystal Mark does not apply to appendices 1 to 4.

Appendix 1 – Specific questions for waste facilities that accept clinical waste

Note: If your procedures are fully in line with the standards set out in 'Technical guidance for managing clinical waste' (EPR 5.07) then you should tick the 'yes' box and provide the procedure reference from EPR 5.07. There is no need for you to supply a copy of the procedure.

1 Are pre-acceptance procedures in place that are fully in line with the appropriate measures set out in section 2.2 of EPR 5.07 and which are used to assess a waste enquiry before it is accepted at the installation or waste facility?

No ☐ Provide justification for departure from EPR 5.07 and submit a copy of your procedures

Document reference

Yes ☐ EPR 5.07 procedure reference

2 Are waste acceptance procedures in place that are fully in line with the appropriate measures set out in section 2.2 of EPR 5.07, and which are used to cover issues such as loads arriving and being inspected, sampling waste, rejecting waste, and keeping records to track waste?

No ☐ Provide justification for departure from EPR 5.07 and submit a copy of your procedures

Document reference

Yes ☐ EPR 5.07 procedure reference

3 Are waste storage, handling and dispatch procedures, and infrastructure in place that are fully in line with the appropriate measures set out in section 3.2 of EPR 5.07?

No ☐ Provide justification for departure from EPR 5.07 and submit a copy of your procedures

Document reference

Yes ☐ EPR 5.07 procedure reference

4 Are monitoring procedures in place that are fully in line with the appropriate measures set out in section 3.3 of EPR 5.07?

No ☐ Provide justification for departure from EPR 5.07 and submit a copy of your procedures

Document reference

Yes ☐ EPR 5.07 procedure reference

5 Are you proposing to either

- accept an additional waste not included in Table 2.1 of section 2.1 of EPR 5.07, or
- apply a permitted activity to a waste other than that identified for that waste in Table 2.1?

No ☐

Yes ☐ Provide justification

Document reference

6 Please provide a summary description of the treatment activities undertaken on the waste facility. This should cover the general principles set out in section 2.1.4 of EPR S5.07

Document reference for the summary

7 Please provide layout plans detailing the location of each treatment plant and main plant items and process flow diagrams for the treatment plant

Document reference

Appendix 2 – Specific questions for waste facilities that accept hazardous waste

Note: If your procedures are fully in line with the standards set out in 'Recovery and disposal of hazardous and non-hazardous waste' (SGN 5.06) then you should tick the 'yes' box and provide the procedure reference from SGN 5.06. There is no need for you to supply a copy of the procedure.

1 Are pre-acceptance procedures in place that are fully in line with the appropriate measures set out in section 2.1.1 of SGN 5.06, and which are used to assess a waste enquiry before it is accepted at the waste facility?

No ☐ Provide justification for departure from SGN 5.06 and submit a copy of your procedures

Document reference

Yes ☐ SGN 5.06 procedure reference

2 Are waste acceptance procedures in place that are fully in line with the appropriate measures set out in section 2.1.2 of SGN 5.06, and which are used to cover issues such as loads arriving and being inspected, sampling waste, rejecting waste, and keeping records to track waste?

No ☐ Provide justification for departure from SGN 5.06 and submit a copy of your procedures

Document reference

Yes ☐ SGN 5.06 procedure reference

3 Are waste storage procedures and infrastructure in place that are fully in line with the appropriate measures set out in section 2.1.3 of SGN 5.06?

No ☐ Provide justification for departure from SGN 5.06 and submit a copy of your procedures

Document reference

Yes ☐ SGN 5.06 procedure reference

4 Provide a layout plan giving details of where the waste facility is based, the infrastructure in place (including areas and structures for separately storing types of waste which may be dangerous to store together) and capacity of waste storage areas and structures

Document reference

5 Provide a summary of the treatment activities carried out on the waste facility. This should cover the general principles set out in section 2.1.4 of SGN 5.06

Document reference for the summary

6 Provide layout plans giving details of where each treatment plant is based, the main items at each plant, and process flow diagrams for the treatment plant

Document reference or references

Appendix 3 – Specific questions for the recovery to land for agricultural benefit of compost like outputs from the treatment of mixed municipal solid wastes

1 Provide an accurate and reliable characterisation of your compost like outputs (CLO). This should be based on sampling and analysis of the CLO produced by the treatment (MBT) process over a 12 month period and in accordance with section 2 of TGN 6.15

Document reference

2 Provide an agricultural benefit assessment for the use of your CLO. This should be based on section 2 of TGN 6.15 and should be signed and dated by an appropriate technical expert

Document reference

3 Provide a site specific risk assessment of risks to soil and food chain receptors. This should be based on Schedule 2 of TGN 6.15 and include a map with a green outline showing the boundary of the area being treated and include:

- locations where the waste will be stored and spread;
- any spring, well or borehole used to supply water for domestic or food production purposes that is within 250 metres of the area being treated;
- any spring, well or borehole not being used for domestic or food production purposes that is within 50 metres of the area being treated;
- any European designated sites (candidate or Special Area of Conservation, proposed or Special Protections Area in England and Wales or Ramsar Site) or Sites of Special Scientific Interest (SSSI) which are within 500 metres of the place where waste is to be stored or spread;
- the location of public rights of way;
- any Groundwater Source Protection Zones;
- surface watercourses;
- any buildings or houses within 250 metres of the area being treated;
- land drains within the boundary.

Document reference

4 Are the technical standards and measures fully in line with those set out in section 3 of TGN 6.15?

Yes ☐

No ☐ Provide justification for departure from TGN 6.15 and a copy of the proposed technical standards, measures or procedures.

Document reference

Appendix 4 – Specific questions for inert waste landfill and deposit for recovery operations

1 Provide your Environmental Setting and Site Design (ESSD) report

Document reference

Note: You should use the Environment Agency template to help you develop an environmental setting and site design (ESSD) report.

2 Provide your Waste Acceptance Procedures (including Waste Acceptance Criteria)

Document reference

3 Have you provided a hydrogeological risk assessment (HRA) for the site?

Yes ☐

No ☐ If no, please refer to the section of your ESSD that explains why this is unnecessary for your site

Document reference

4 Have you completed an outline engineering plan for the site?

Yes ☐

No ☐ If no, please refer to the section of your ESSD that explains why this is unnecessary for your site

Document reference

5 Have you provided a stability risk assessment (SRA) for your site?

Yes ☐

No ☐ If no, please refer to the section of your ESSD that explains why this is unnecessary for your site

Document reference

6 Have you completed a monitoring plan for the site?

Yes ☐

No ☐ If no, please refer to the section of your ESSD that explains why this is unnecessary for your site

Document reference

7 Have you completed a plan for closing the site and procedures for looking after the site once it has closed?

Yes ☐ For inert waste landfill you must provide a closure plan

No ☐ If no for deposit for recovery activities please refer to the section of your ESSD that explains why this is unnecessary for your site

Document reference

Spreading waste to support plant growth

8a Does the activity involve the deposit of waste to create or treat a growing medium (R10 for land treatment)?

Yes ☐

No ☐

Note: If you are not depositing waste to create or treat a growing medium, you do not need to answer questions 8b and 8c.

8b If you answered 'yes' to question 8a, can you meet both of the following criteria?

- waste types to be used for the R10 activity are top soils (EWC 17 05 04 or 20 02 02), peat (EWC 17 05 04 or 20 02 02) and/or soil from cleaning and washing beet (EWC 02 04 01) only, and
- The depth of deposit for the R10 activity will not exceed the final 50cm

Yes ☐

No ☐

8c If you have answered 'No' to 8b above, have you completed a benefit statement?

Yes ☐

No ☐ If no, please explain why

Document reference

Note: Refer to our guidance when completing your statement (including EPR 8.01, section 6)

Form F1

Application for an environmental permit Part F1 – Charges and declarations

Fill in this part for all applications for installations, waste operations, mining waste operations, water discharges, point source groundwater discharges and groundwater discharges onto land. Please check that this is the latest version of the form available from our website.

Please read through this form and the guidance notes that came with it.

The form can be:

1 Saved onto a computer and then filled in. Please note that the form follows a logic that means questions will open or stay closed depending on a previous answer. So you may not be able to enter text in some boxes.

2 Printed off and filled in by hand. Please write clearly in the answer spaces.

It will take less than two hours to fill in this part of the application form.

Contents

1 Working out charges (you must fill in this section)

You have to submit an application fee with your application. You can find out the charge by searching for 'Environment Agency charging scheme and guidance: environmental permits' at www.gov.uk/government/organisations/environment-agency.

Please remember that the charges are revised on 1 April each year and that there is an annual subsistence charge to cover the costs we incur in the ongoing regulation of the permit.

Table 1 Type of application (add number if more than one)

Installation	Waste	Mining waste	Water discharge/point source discharge to groundwater	Groundwater spreading onto land
yes				
	yes			

Table 2 Charge type (A)

Activity description	Activity reference	Percentage charge (see charges tables)						Amount
		100	60	50	30	20	10	
storage of haz wastes	5.6 Part A (1) (a)	☐	☐	☐	☐	☐	☑	£ 1,351.90
treatment of haz wastes	5.3 Part A (1) (a) (ii)	☑	☐	☐	☐	☐	☐	16,001.00
waste operation		☐	☐	☐	☐	☐	☑	793.00
		☐	☐	☐	☐	☐	☐	
		☐	☐	☐	☐	☐	☐	
Total A								£ 18,145.90

1 Working out charges (you must fill in this section), continued

Table 3 Additional component charges (B)

Part 1.19 Charges for plans and assessments			Tick appropriate
Reference	**Plan or assessment**	**Charge**	
1.19.1	Waste recovery plan	£1,231	☐
1.19.2	Habitats assessment	£779	☑
1.19.3	Fire prevention plan	£1,241	☑
1.19.4	Pest management plan	£1,241	☐
1.19.5	Dust management plan	£1,241	☐
1.19.6	Odour management plan	£1,246	☐
1.19.7	Noise and vibration management plan	£1,246	☐
1.19.8	Ammonia emissions risk assessment	£620	☐
1.19.9	Dust and bio-aerosol management plan	£620	☐
	Advertising	£500	☑
Total B			£ 2,520.00

Total charges

Total A plus total B £ 20,665.90

2 Payment

Tick below to show how you have paid.

Cheque ☐

Postal order ☐

Cash ☐ Tick below to confirm you are enclosing cash with the application

Credit or debit card ☐

Electronic transfer (for example, BACS) ☑

Remittance number tbc

Date paid (DD/MM/YYYY) 17/12/2018

How to pay

Paying by cheque, postal order or cash

Cheque details

Cheque made payable to

Cheque number

Amount £

You should make cheques or postal orders payable to 'Environment Agency' and make sure they have 'A/c Payee' written across them if it is not already printed on.

Please write the name of your company and application reference number on the back of your cheque or postal order.
We will not accept cheques with a future date on them.

We do not recommend sending cash through the post. If you cannot avoid this, please use a recorded delivery postal service and enclose your application reference details. Please tick the box below to confirm you are enclosing cash.

I have enclosed cash with my application ☐

Paying by credit or debit card

If you are paying by credit or debit card, either we can call you or you can fill in the separate form CC1 and enclose it with the application. We will destroy your card details once we have processed your payment. We can accept payments by Visa, MasterCard or Maestro card only.

2 Payment, continued

Please call me to arrange payment by debit or debit card ☐

I have enclosed form CC1 with my application ☐

Paying by electronic transfer BACS reference

If you choose to pay by electronic transfer you will need to use the following information to make your payment.

Company name	Environment Agency
Company address	SSCL (Environment Agency), PO Box 797, Newport Gwent, NP10 8FZ
Bank	RBS/NatWest
Address	London Corporate Service Centre, CPB Services, 2nd Floor, 280 Bishopsgate, London EC2M 4RB
Sort code	60-70-80
Account number	10014411
Account name	EA RECEIPTS
Payment reference number	PSCAPPXXXXXYYY

You need to create your own reference number. It should begin with PSCAPP (to reflect that the application is for a permitted activity) and it should include the first five letters of the company name (replacing the X's in the above reference number) and a unique numerical identifier (replacing the Y's in the above reference number). The reference number that you supply will appear on our bank statements.

You should also email your payment details and reference number to ea_fsc_ar@sscl.gse.gov.uk.

If you are making your payment from outside the United Kingdom, it must be in sterling. Our IBAN number is GB23NWK60708010014411 and our SWIFTBIC number is NWBKGB2L.

If you do not quote your reference number, there may be a delay in processing your payment and application.

Now read section 3 below.

3 The Data Protection Act 1998

We, the Environment Agency, will process the information you provide so that we can:

- deal with your application;
- make sure you keep to the conditions of the licence, permit or registration;
- process renewals; and
- keep the public registers up to date.

We may also process or release the information to:

- offer you documents or services relating to environmental matters;
- consult the public, public organisations and other organisations (for example, the Health and Safety Executive, local authorities, the emergency services, the Department for Environment, Food and Rural Affairs) on environmental issues;
- carry out research and development work on environmental issues;
- provide information from the public register to anyone who asks;
- prevent anyone from breaking environmental law, investigate cases where environmental law may have been broken, and take any action that is needed;
- assess whether customers are satisfied with our service, and to improve our service; and
- respond to requests for information under the Freedom of Information Act 2000 and the Environmental Information Regulations 2004 (if the Data Protection Act allows). We may pass the information on to our agents or representatives to do these things for us.

Now read section 4 below.

4 Confidentiality and national security

We will normally put all the information in your application on a public register of environmental information. However, we may not include certain information in the public register if this is in the interests of national security, or because the information is confidential.

You can ask for information to be made confidential by enclosing a letter with your application giving your reasons. If we agree with your request, we will tell you and not include the information in the public register. If we do not agree with your request, we will let you know how to appeal against our decision, or you can withdraw your application.

Only tick the box below if you wish to claim confidentiality for your application

Please treat the information in my application as confidential ☐

4 Confidentiality and national security, continued

National security

You can tell the Secretary of State that you believe including information on a public register would not be in the interests of national security. You must enclose a letter with your application telling us that you have told the Secretary of State and you must still include the information in your application. We will not include the information in the public register unless the Secretary of State decides that it should be included.

You can find guidance on national security in 'Environmental permitting guidance: core guidance', published by Defra and available via our website at gov.uk.

You cannot apply for national security via this application.

Now go to section 5.

5 Declaration

If you knowingly or carelessly make a statement that is false or misleading to help you get an environmental permit (for yourself or anyone else), you may be committing an offence under the Environmental Permitting (England and Wales) Regulations 2010.

A relevant person should make the declaration (see guidance notes on part F1). An agent acting on behalf of an applicant is NOT a relevant person.

Each individual (or individual trustee) who is applying for their name to appear on the permit must complete this declaration. You will have to print a separate copy of this page for each additional individual to complete.

If you are transferring all or part of your permit, both you and the person receiving the permit must make the declaration. You must fill in the declaration directly below; the person receiving the permit must fill in the declaration under the heading 'For transfers only'.

Note: we will issue a letter to both current and new holders to confirm the transfer. If you are changing address we will need to send this letter to your new address; therefore please tell us your new address in a separate letter.

If you are unable to trace one or more of the current permit holders please see below under the transfers declaration.

I declare that the information in this application is true to the best of my knowledge and belief. I understand that this application may be refused or approval withdrawn if I give false or incomplete information.

If you deliberately make a statement that is false or misleading in order to get approval you may be prosecuted.

I confirm that my standard facility will fully meet the rules that I have applied for (this only applies if the application includes standard facilities)	☐
Tick this box to confirm that you understand and agree with the declaration above, then fill in the details below (you do not have to provide a signature as well)	☐
Tick this box if you do not want us to use information from any ecological survey that you have supplied with your application (for further information please see the guidance notes on part F1)	☐

Name

Title (Mr, Mrs, Miss and so on)	Mr
First name	Graeme
Last name	Parkin
on behalf of (if relevant; for example, a company or organisation and so on)	Wastecare Limited
Position (if relevant; for example, in a company or organisation and so on)	Chief Operating Officer
Today's date (DD/MM/YYYY)	17/12/2018

For transfers only – declaration for person receiving the permit

A relevant person should make the declaration (see guidance notes on part F1). An agent acting on behalf of an applicant is NOT a relevant person.

I declare that the information in this application to transfer an environmental permit to me is true to the best of my knowledge and belief. I understand that this application may be refused or approval withdrawn if I give false or incomplete information.

Note: If you cannot trace a person or persons holding the permit you may be able to transfer the permit without their declaration as above. Please contact us to discuss this and supply evidence in your application to confirm you are unable to trace one or all of the permit holders.

If you deliberately make a statement that is false or misleading in order to get approval you may be prosecuted.

5 Declaration, continued

Tick this box to confirm that you understand and agree with the declaration above, then fill in the details below (you do not have to provide a signature as well) ☐

Name

Title (Mr, Mrs, Miss and so on)

First name

Last name

on behalf of (if relevant; for example, a company or organisation and so on)

Position (if relevant; for example, in a company or organisation and so on)

Today's date (DD/MM/YYYY)

Now go to section 6

6 Application checklist (you must fill in this section)

If your application is not complete we will return it to you. If you aren't sure about what you need to send, speak to us before you submit your application.

You must do the following:

Complete legibly all parts of this form that are relevant to you and your activities ☑

Identify relevant supporting information in the form and send it with the application ☑

List all the documents you are sending in the table below. If necessary, continue on a separate sheet. This separate sheet also needs to have a reference number and you should include it in the table below ☑

For new permits or any changes to the site plan, provide a plan that meets the standards given in the guidance note on part F1 ☑

Provide a supporting letter for any claim that information is confidential ☐

Get the declaration completed by a relevant person (not an agent) ☑

Send the correct fee ☑

Question reference	Document title	Document reference
	Non Technical Summary	
	Operating Techniques	
	Amenity and Accident Risk Assessment	
	Conservation Risk Assessment	
	Fire Prevention Plan	
	Assessment of Best Available Techniques	
	Drawings	

7 How to contact us

If you need help filling in this form, please contact the person who sent it to you or contact us as shown below.

General enquiries: 03708 506 506 (Monday to Friday, 8am to 6pm)

Textphone: 03702 422 549 (Monday to Friday, 8am to 6pm)

Email: enquiries@environment-agency.gov.uk

Website: www.gov.uk/government/organisations/environment-agency

If you are happy with our service, please tell us. It helps us to identify good practice and encourages our staff. If you're not happy with our service, please tell us how we can improve it.

Please tell us if you need information in a different language or format (for example, in large print) so we can keep in touch with you more easily.

8 Where to send your application (for how many copies to send see the guidance note on part F1)

Please send your filled in application form to:

For water discharges by email to PSC-WaterQuality@environment-agency.gov.uk

For waste and installations by email to PSC@environment-agency.gov.uk

Or

Environment Agency Permitting and Support Centre
Environmental Permitting Team
Quadrant 2
99 Parkway Avenue
Parkway Business Park
Sheffield
S9 4WF

Do you want all information to be sent to you by email?

Please tick this box if you wish to have all communication about this application sent via email (we will use the details provided in Part A) ☐

Feedback

(You don't have to answer this part of the form, but it will help us improve our forms if you do.)

We want to make our forms easy to fill in and our guidance notes easy to understand. Please use the space below to give us any comments you may have about this form or the guidance notes that came with it.

How long did it take you to fill in this form?

We will use your feedback to improve our forms and guidance notes, and to tell the Government how regulations could be made simpler.

Would you like a reply to your feedback?

Yes please ☐

No thank you ☐

Crystal Mark 19132
Clarity approved by Plain English Campaign

For Environment Agency use only

Date received (DD/MM/YYYY)

Our reference number

Payment received?

No ☐

Yes ☐ Amount received

£

COTC CERTIFICATES

wamitab

Certificate No. CCC14711

Continuing Competence Certificate

This certificate confirms that

Helen Marie Kellett

Has met the relevant requirements of the Continuing Competence scheme for the following award(s) which will remain current for two years from 28/06/2017

TSH	Transfer - Hazardous Waste
TMH	Treatment - Hazardous Waste
TMNH	Treatment - Non Hazardous Waste

Awarded: 28/06/2017

Authorised

WAMITAB Chief Executive Officer

CIWM Chief Executive Officer

The Chartered Institution of Wastes Management

00123443

WAMITAB

WASTE MANAGEMENT INDUSTRY TRAINING AND ADVISORY BOARD

CERTIFICATE No: **11030**

CERTIFICATE OF TECHNICAL COMPETENCE

This Certificate confirms that

Helen Marie Kellett

has demonstrated the standard of technical competence required for the management of a facility of the type set out below

Facility Type:

Level 4 in Waste Management Operations -

Managing Transfer Hazardous Waste (4TSH)

Authorising Signatures:

Director General

Director

Date of issue: 23 October 2009

WAMITAB

WASTE MANAGEMENT INDUSTRY TRAINING AND ADVISORY BOARD

CERTIFICATE No: **11029**

CERTIFICATE OF TECHNICAL COMPETENCE

This Certificate confirms that

Helen Marie Kellett

has demonstrated the standard of technical competence required for the management of a facility of the type set out below

Facility Type:

Level 4 in Waste Management Operations -

Managing Treatment Hazardous Waste (4TMH)

Authorising Signatures:

Director General _____

Director _____

Date of issue: 23 October 2009

NON-TECHNICAL SUMMARY

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ENERGY AND CLIMATE CHANGE
ENVIRONMENT AND SUSTAINABILITY
INFRASTRUCTURE AND UTILITIES
LAND AND PROPERTY
MINING AND MINERAL PROCESSING
MINERAL ESTATES
WASTE RESOURCE MANAGEMENT

WASTECARE LIMITED

BATTERY TREATMENT FACILITY, HALIFAX

NON-TECHNICAL SUMMARY

DECEMBER 2018

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1 INTRODUCTION

1.1 Wastecare Limited are applying for a bespoke installation permit at Units 1-6 North Dean Business Park, Stainland Road, Halifax, HX4 8LR. The site location and proposed permit boundary of the facility are shown on drawings ST16653-001 and ST16653-002 respectively.

1.2 The facility will sort batteries into their different chemistries. Alkaline batteries and batteries with zinc or manganese chemistry (referred to as alkaline batteries in this application) will then be deconstructed in a hammermill to facilitate the recovery of four fractions, specifically ferrous metal, non-ferrous metal, mixed paper and plastic and black mass. The other types of batteries separated into their different types will be sent for offsite recycling and recovery. This includes batteries containing fluids, e.g. lead acid batteries, will not be treated on site but will be bulked up for treatment elsewhere.

1.3 The facility will accept up to 25,000 tonnes per annum of hazardous and non-hazardous batteries. A full list of the battery types that may be accepted on site is given in the Operating Techniques.

1.4 The storage and treatment (sorting) of mixed batteries (hazardous waste) of more than 10 tonnes per day means this activity falls under Schedule I Part II of the Environmental Permitting (England and Wales) Regulations 2016, making it an 'installation':

Section 5.3 Part A(1) (a)
Disposal or recovery of hazardous waste with a capacity exceeding 10 tonnes per day involving one or more of the following activities—
(ii) physico-chemical treatment

Section 5.6 Part A(1) (a)
Temporary storage of hazardous waste with a total capacity exceeding 50 tonnes pending any of the activities listed in Sections 5.1, 5.2, 5.3

1.5 The permit application also includes a new waste operation activity for the mechanical treatment of non-hazardous alkaline batteries.

1.6 Treatment of batteries will be carried out in accordance with Best Available Techniques. Furthermore, small items of waste electrical and electronic equipment (WEEE) will also be accepted at the site. These will be treated to remove the batteries and sort them for recycling. Treatment of WEEE is carried out using Best Available Treatment, Recovery and Recycling Techniques (BATRRT).

1.7 The treatment and storage of waste batteries will also comply with Part A of Annex III to the Batteries Directive, specifically: treatment and storage areas will have impermeable surfaces with weatherproof covering in appropriate areas or suitable containers. The recycling process is designed to allow battery recycling through the site to meet the efficiency required by Annex III, Part B of the Batteries Directive, that is recycling at least 65% by average weight of lead-acid batteries, 75% by average weight of nickel cadmium batteries and 50% by average weight of other batteries.

1.8 Wastecare Limited currently operate an authorised WEEE treatment facility operating under a Standard Rules permit (SR2008 No.23) reference EPR/MP3899VT. This will be retained for the pilot plant in Unit 4.

1.9 The site is already operated in accordance with an Environmental Management System (EMS), which meets the requirements of the Environment Agency's Guidance (https://www.gov.uk/guidance/develop-a-management-system-environmental-permits) and is accredited to ISO14001.

1.10 Existing waste acceptance procedures will be updated at the site to continue to ensure that only permitted wastes are accepted at the site. Permitted wastes and waste acceptance procedures are detailed in the Operating Techniques.

1.11 All waste storage and treatment activities will be undertaken in accordance with the EMS to ensure that the environment is protected during all stages of waste battery storage and handling.

1.12 Environmental monitoring and record keeping will be undertaken and completed in accordance with the EMS and the conditions included in the environmental permit when issued.

2 ENVIRONMENTAL PERMIT APPLICATION

2.1 The permit application includes:

- Application Forms A, B2, B3, B4, and F1;
- Non-Technical Summary;
- Operating Techniques;
- BAT Assessment, including energy, waste and raw material quantification;
- Amenity and Accident Risk Assessment;
- Conservation Risk Assessment;
- Fire Prevention Plan; and
- Drawings.

3 SITE OPERATIONS

3.1 Incoming waste deliveries will be met at the site entrance where acceptance checks will be carried out. Transfer notes will be reviewed and where possible each load will be subject to visual inspection to ensure it appears in line with the pre-acceptance information. Loads will initially be inspected by suitably trained personnel to ensure that only permitted waste is accepted and to establish that the wastes are safe to offload.

3.2 Wastes will be unloaded in the waste reception area and transferred to the storage area for wastes pending treatment. Pre-sorted loads of portable alkaline batteries will be stored separately as these will be introduced to the process via a hopper connected to the conveyor that transfers portable alkaline batteries to the second phase of the treatment plant.

3.3 The waste treatment process is undertaken in two phases. The initial phase sorts the mixed waste stream according to whether they are portable, automotive or industrial batteries, battery size and battery type. Further detail is provided in the Operating Techniques.

3.4 The second phase treats only the non-hazardous portable alkaline batteries to separate the different components for recovery, i.e.:

- Black mass;

- Ferrous and non-ferrous metal; and
- Paper and plastic.

3.5 Treatment to recover the separate component streams will use a hammermill, drum magnet, vibro-separator and eddy current separator. A process flow diagram is provided in the Operating Techniques report.

3.6 Recovered waste streams will be stored separately prior to their dispatch from site for recycling or recovery.

4 POLLUTION CONTROL MEASURES

4.1 The potential risks to the environment posed by the site could include odour and dust arising from the battery components during treatment. To prevent emissions from the site as far as possible the following controls are in place.

4.2 The site will be operated in accordance with an Environmental Management System which is accredited to ISO14001, providing written procedures for the management of the facility, including effective maintenance of plant, equipment and site infrastructure. All operations at the site will be managed by a Technically Competent Manager who will ensure that the procedures in the EMS are followed.

4.3 Treatment will be carried out in a purpose designed system which is fully enclosed.

4.4 The site will be provided with impermeable pavement and a sealed drainage system. Dedicated storage will be provided for different waste streams, which will be stored in covered containers or under cover.

4.5 Daily inspections will be made of the site to ensure that, that there is no risk of fire and that there is no odour or dust detectable at the boundary.

4.6 Further information is provided in the Operating Techniques report. An assessment of the environmental risks and the appropriate mitigation is provided in the Amenity and Accident Risk Assessment report.

4.7 The potential impact on nearby ecological receptors has been considered and it has been concluded that there will be no adverse impact on protected habitats. Further information is provided in the Conservation Risk Assessment report.

4.8 A Fire Prevention Plan has been included in the application to reflect the non-hazardous combustible material streams stored at the site.

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OPERATING TECHNIQUES

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BATTERY TREATMENT FACILITY, HALIFAX

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DECEMBER 2018

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ST16653-002	Permit Boundary Plan	1:2,500
ST16653-003	Site Layout and Drainage Plan	1:500

1 INTRODUCTION

1.1 Wastecare Limited are applying for a bespoke installation permit at Units 1-6 North Dean Business Park, Stainland Road, Halifax, HX4 8LR. The site location and proposed permit boundary of the facility are shown on drawings ST16653-001 and ST16653-002 respectively.

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1.4 The storage and treatment (sorting) of mixed batteries (hazardous waste) of more than 10 tonnes per day means this activity falls under Schedule I Part II of the Environmental Permitting (England and Wales) Regulations 2016, making it an 'installation':

Section 5.3 Part A(1) (a)
Disposal or recovery of hazardous waste with a capacity exceeding 10 tonnes per day involving one or more of the following activities—
(ii) physico-chemical treatment

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1.5 The permit application also includes a new waste operation activity for the mechanical treatment of non-hazardous alkaline batteries.

1.6 Treatment of batteries will be carried out in accordance with Best Available Techniques. Furthermore, small items of waste electrical and electronic equipment (WEEE) will also be accepted at the site. These will be treated to remove the batteries and sort them for recycling. Treatment of WEEE is carried out using Best Available Treatment, Recovery and Recycling Techniques (BATRRT).

1.7 The treatment and storage of waste batteries will also comply with Part A of Annex III to the Batteries Directive, specifically: treatment and storage areas will have impermeable surfaces with weatherproof covering in appropriate areas or suitable containers. The recycling process is designed to allow battery recycling through the site to meet the efficiency required by Annex III, Part B of the Batteries Directive, that is recycling at least 65% by average weight of lead-acid batteries, 75% by average weight of nickel cadmium batteries and 50% by average weight of other batteries.

1.8 Wastecare Limited currently operate an authorised WEEE treatment facility operating under a Standard Rules permit (SR2008 No.23) reference EPR/MP3899VT. This will be retained for the pilot plant in Unit 4.

1.9 The site is operated in accordance with an Environmental Management System (EMS), which meets the requirements of the Environment Agency's Guidance (https://www.gov.uk/guidance/develop-a-management-system-environmental-permits) and is accredited to ISO 14001. The key features of the EMS are described in Section 3.

1.10 Permitted wastes, including the European Waste Catalogue (EWC) references, are detailed in Section 4. Waste acceptance procedures will be employed at the site to ensure that only permitted wastes are accepted at the site. Waste acceptance procedures are detailed in Section 5.

1.11 All waste storage and treatment activities will be undertaken in a manner that ensures environmental protection at all times. Details of the waste treatment process and the robust site infrastructure provided to ensure environmental protection during normal and abnormal operational scenarios are discussed in Sections 6, 7 and 8.

1.12 Environmental monitoring and record keeping will be undertaken and completed in accordance with the EMS and the conditions of the environmental permit, when

issued. Further information on this is provided in Section 9.

2 REGULATED ACTIVITIES

2.1 The site is classed as an installation under the Environmental Permitting (England and Wales) Regulations 2016

2.2 The proposed installation activities, waste operations and Directly Associated Activities (DAAs) are set out in Table 2:1 below.

Table 2:1 Installation Description

Activity	Schedule 1 classification	Limits of prescribed activity, including WFD Annex I and II Codes
Listed Activities		
Storage of hazardous wastes	Section 5.6 Part A (1) (a) for the *"Temporary storage of hazardous waste with a total capacity exceeding 50 tonnes pending any of the activities listed in Sections 5.1, 5.2, 5.3…"*	**R13:** storage of wastes pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it was produced) The maximum quantity of mixed batteries pending sorting on site at any one time will be 12,500 tonnes. Hazardous batteries will be stored in appropriate covered storage areas following sorting. Waste types will be as set out in Section 4.
Recovery of hazardous wastes	5.3 Part A (1) (a) (ii) for the *"Recovery or a mix of recovery and disposal of hazardous waste with a capacity exceeding 10 tonnes per day involving… physico-chemical treatment"*	**R3:** recycling/reclamation of organic substances which are not used as solvents **R4:** recycling/reclamation of metals and metal compounds **R5:** recycling/reclamation of inorganic materials other than metals or metal compounds **R13:** storage of wastes pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it was produced) **D15**: storage pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where the waste is produced) Annual throughput for the site of 25,000 tonnes per annum. The site has the ability to treat 100 tonnes per day of hazardous wastes.

Table 2:1 Installation Description		
Activity	**Schedule 1 classification**	**Limits of prescribed activity, including WFD Annex I and II Codes**
		Waste types will be as set out in Section 4.
Waste Operations		
Recovery of non-hazardous wastes	Not applicable	**R3:** recycling/reclamation of organic substances which are not used as solvents **R4:** recycling/reclamation of metals and metal compounds **R5:** recycling/reclamation of inorganic materials other than metals or metal compounds **R13:** storage of wastes pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it was produced) The site has the ability to treat 100 tonnes per day of non-hazardous wastes. Waste types will be as set out in Section 4.
Directly Associated Activities		
Storage of wastes generated on site	Not applicable	**R13:** storage of wastes pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it was produced) The maximum quantity of black mass pending removal from site at any one time will be 50 tonnes. The maximum quantity of ferrous and non-ferrous metal pending removal from site at any one time will be 60 tonnes. The maximum quantity of paper and plastic pending removal from site at any one time will be 60 tonnes.

3 SITE MANAGEMENT

3.1 The site will be operated in accordance with Wastecare Limited's Environmental Management System (EMS). A summary of the EMS is provided as Appendix 1.

3.2 The EMS includes an Environmental Policy that makes a commitment to compliance with relevant legislation and the conditions of the Environmental Permit as well as seeking continuous improvement in environmental matters.

3.3 Written procedures are provided for all aspects of site operations to ensure that activities are carried out in a manner which will secure legal compliance and protect the environment. These will include procedures for pre-acceptance checks, waste acceptance and rejection, waste handling and treatment and waste dispatch.

3.4 Site operations will be audited internally and externally on an annual basis to confirm compliance with the written procedures, review progress and set targets for continuing improvement over the coming year.

3.5 Environmental issues will be a factor in purchasing of equipment and any infrastructure improvements, ensuring high levels of protection. Where possible equipment offering better energy efficiency and lower emissions will be selected.

3.6 A record will be kept of the skills necessary for each role and training needs will be assessed on an annual basis. All staff will be trained with regards to the Environmental Permit and Environmental Management System ensuring that they have an understanding commensurate with their post.

3.7 An induction will be provided for contractors and visitors on site, giving an introduction to health and safety and environmental issues on site and ensuring that they are aware of any site-specific requirements and are able to carry out their duties without harm to the environment.

3.8 A preventative maintenance programme will be in place with all site infrastructure and equipment inspected on a regular basis and serviced in accordance with the manufacturer's recommendations. Records will be kept of all inspections and any necessary repairs or maintenance will be noted, with timescales for these to be carried out.

4 PERMITTED WASTES

4.1 A list of EWC codes for acceptable wastes is provided in Table 4:1, below. It is likely that the loads of mixed batteries which are classified as hazardous waste will commonly comprise approximately 65-85% alkaline batteries which are non-hazardous when separated out.

Table 4:1: Permitted Wastes	
EWC Code	**Waste Type**
16	**Wastes not otherwise specified in the list**
16 02	**Wastes from electrical and electronic equipment**
16 02 13*	Discarded equipment containing hazardous components other than those mentioned in 16 02 09 t0 16 02 12
16 02 14	Discarded equipment other than those mentioned in 16 02 09 to 16 02 13
16 02 15*	Hazardous components removed from discarded equipment
16 02 16	Components removed from discarded equipment other than those mentioned in 16 02 15
16 06	**Batteries and accumulators**
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
19	**Wastes from waste management facilities, off site waste water treatment plant and the preparation of water intended for human consumption and water for industrial use**
19 12	**Wastes from mechanical waste not otherwise**
19 12 11*	Other wastes (including mixtures of materials) from mechanical treatment of waste containing dangerous substances. (WEEE sorted for recycling)
19 12 12	Other waste (including mixtures of materials) from mechanical treatment of waste other than those mentioned in 19 12 11 (WEEE sorted for recycling)
20	**Municipal Wastes (Household waste and similar commercial, industrial and institutional wastes) Including separately collected fractions**
20 01	**separately collected fractions (except 15 01)**
20 01 21*	Fluorescent tubes and other mercury containing waste
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 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.

5 WASTE ACCEPTANCE PROCEDURES

Pre-Acceptance

5.1 The waste types to be accepted on site arise from the centralised collection of household batteries at designated drop-off centres through national battery collection schemes. These schemes target the collection of mixed household batteries. Deliveries will be made by Wastecare from their other UK waste transfer stations and from third parties.

5.2 All deliveries from third parties will be pre-notified to Wastecare for agreement. Batteries to be delivered from other Wastecare facilities will be notified to the site manager, with waste pre-acceptance checks being undertaken at the consigning site.

Acceptance

5.3 Materials to be processed at the site will be transported by a registered Waste Carrier and accompanied by a 'Waste Transfer Note' in accordance with the legal requirements of the Duty of Care for waste (non-hazardous waste) or a consignment note in accordance with the Hazardous Waste Regulations 2005 (hazardous waste). Waste will not be accepted if for any reason there is insufficient storage capacity available or if the site is inadequately manned.

5.4 Incoming waste deliveries will be met at the site entrance where acceptance checks will be carried out. Transfer or consignment notes will be reviewed and where possible each load will be subject to visual inspection to ensure it appears in line with the pre-acceptance information.

5.5 Loads will initially be inspected by suitably trained personnel to ensure that only permitted waste is accepted and to establish that the wastes are safe to offload. This will include checking the integrity of containers and pallets and looking for any signs of damage to packaging or batteries. Where the contents can be easily checked, such as battery boxes, an inspection will be undertaken of each box to ensure that the box actually contains the type of batteries expected. If the load consists of many smaller packages, then the initial inspection will only cover the packaging condition.

5.6 Subject to delivery passing the initial acceptance checks, waste will then be directed to the waste reception area for unloading.

5.7 Any discrepancies found as a result of the checks detailed above will result in:

- referral to the technically competent manager;
- referral to the producer site, to confirm the nature of the waste load;
- a written record being made in the site log to record the nature of the waste and the action taken; and
- referral to the Environment Agency in the case of possible breaches of legislation or imminent pollution.

5.8 Where waste is not in compliance the load will be rejected and will be returned to the waste producer where possible. Where this is not possible the waste will be directed to the quarantine area and arrangements will be made for it to be removed to a permitted site as soon as possible.

5.9 Loads (or part loads) may be rejected or placed in quarantine following their unloading in the waste reception area when:

- the container is highly contaminated with WEEE without prior consent;
- the container is highly contaminated with burnt or unidentifiable batteries without prior consent;
- the container is highly contaminated with non-battery material; or
- the container is highly contaminated with water.

5.10 The Wastecare non-conformance procedure, which is included in the EMS, will be followed in all non-conformance events.

5.11 Records will be kept for each load arriving on site including details of:

- date of delivery;
- the waste producer;
- quantity of waste;
- waste type;
- pertinent details regarding the waste appearance (smell, colour and physical form);
- classification under the List of Waste Regulations;
- six figure code according to the European Waste Catalogue; and
- waste carrier name, address and registration number.

5.12 All pre-acceptance and acceptance documentation will be made available for

inspection by authorised officers of the Environment Agency on request.

6 WASTE STORAGE AND PROCESSING

General

6.1 The waste treatment process is undertaken in two phases. The initial phase sorts the mixed waste stream into the different component streams listed below in Table 6.1.

Table 6:1: Battery Types to be Accepted and Sorted

Description	Includes	Classification
Zinc/manganese (often referred to as alkaline batteries)	Alkaline Zinc chloride Zinc air Oversize zinc/manganese	Non-hazardous
NiCad	Dry NiCad Wet NiCad	hazardous
Lead Acid	Dry (VRLA – plastic case) Dry-Cylon (steel case) Wet	hazardous
Lithium Ion	Laptop and cells Power tools Mobile phones Video cameras E-cigarettes	Non-hazardous
Lithium Ion Polymer	Tablet/laptop Mobile phone	Non-hazardous
Lithium primary	Coin cells Non-coin cells	Non-hazardous
Nickel Metal Hydride (NiMH)	All sizes	Non-hazardous
Button cells	Zinc air Silver oxide Alkaline	hazardous
Non-battery material	Small WEEE Water filters (incidental to battery loads only) Light bulbs (including CFL) Printer ink cartridges (incidental to battery loads only) General litter (incidental to battery loads only)	Non-hazardous, except compact fluorescent lamps, which are hazardous

6.2 The second phase treats only the non-hazardous portable alkaline batteries to separate the different components for recovery:

- black mass;
- ferrous metal;
- non-ferrous metal; and
- paper and plastic.

6.3 A process flow is provided as Appendix 2

6.4 A site layout plan is provided as drawing reference ST16653-003.

Waste Reception

6.5 Wastes will be unloaded in the waste reception area and transferred to the storage area for wastes pending treatment. Pre-sorted loads of alkaline batteries will be stored separately as these will be introduced to the process via a hopper connected to the conveyor that transfers portable alkaline batteries to the second phase of the treatment plant.

6.6 All sorted batteries will be weighed using pallet scales. The scales are calibrated annually by a third party and checked daily using battery boxes of sand of known weights, as well as confirming zero readings when unloaded. These daily checks will be recorded, signed for and filed.

6.7 Occasionally, staff will encounter a battery that they will not be able to identify. Any such batteries will be quarantined for further assessment. Site personnel will also have access to the internet so that they can investigate the chemistry or application of any unknown batteries after placing them in quarantine.

6.8 The facility has a laboratory, equipped with tools, scales and a voltage meter, where further work can be undertaken to try and establish the chemistry of the battery. Its weight can also be checked and visual inspection will establish if it is sealed. The battery cells may be removed from any casing to try and help establish its chemistry as this may be shown on individual cells in a pack. Magnets can also be used to establish if the battery casing is magnetic.

Quarantine Area

6.9 A quarantine area surrounded by concrete walls has been established to receive items that may need to be returned or require special control measures. The quarantine area provides a storage area of 100m^2.

Waste Processing

6.10 The majority of batteries received at site are from public collection points and are suited to mechanical sorting due to the types of batteries in the mix. There are two separate phases at the facility.

Phase 1 – Sorting

6.11 The sorting phase will be undertaken in Unit 3 as shown on drawing ST16653-003.

6.12 Sorting processes at the facility will utilise mechanical sorting equipment to sort batteries by size before presenting batteries to sorting personnel on conveyors for manual sorting by chemistry, where automated sorting is not possible.

6.13 A fork lift truck with a rotator will tip containerised batteries into the hopper at the start of the sorting line. The hopper will feed a conveyor for the manual removal of non-battery items such as litter and plastic bags. The batteries will then pass over a vibrating table with an initial small grid, which will allow the button cells to be separated. These will drop through the grid directly into and appropriate button cell box. The remaining batteries will pass over a larger grid which will separate the oversize batteries from standard household batteries. This sort is purely by size and not chemistry, type or weight.

6.14 The medium sized batteries will then pass along a conveyor, where batteries will be hand sorted according to chemistry. The portable alkaline batteries, which are suitable for further treatment, will be collected at the end of the conveyor.

6.15 Large batteries will also be sorted by hand and transferred to the appropriate storage areas.

6.16 Sorted batteries will be stored in appropriate containers as set out in Table 6.2 below.

Table 6:2: Battery Storage		
Battery types	**Container type**	**Storage capacity**
Mixed batteries at front end	large fibre bags, UK and EU approved plastic drum or box	1,000t
NiMH	large fibre bags	40t
Lithium	UK and EU approved plastic drum or box	250t
Button cells	UK and EU approved plastic box	120t
Portable NiCad	large fibre bags	100t
Industrial NiCd, Wet NiCd	weather proof containers	100t
Lead acid	Plastic battery boxes	120t
Alkaline portable	large fibre bags	6,000t

6.17 Different types of batteries will be stored separately at the locations shown on drawing ST16653-003. Wet lead acid and wet alkaline NiCad could be viewed as incompatible and will not be stored together or adjacent to each other.

6.18 All recovered battery streams will be sent for recycling.

6.19 WEEE and residual waste will be stored separately in suitable bags or containers. Where possible these wastes will be sent on for recycling. Paper, plastic and similar wastes may be sent for energy recovery.

6.20 All staff involved in sorting will be trained to classify batteries into the correct category and chemistry. Training will consist of a mixture of tool box talks and documents that are posted around site. The training room at the site is also stocked with various types and chemistries of batteries to assist training sessions on battery classification by type and chemistry, as well as safety. A notice board in the sorting area will be used to reinforce the key messages for staff working on battery sorting.

Phase 2 – Treatment of Portable Alkaline Batteries

6.21 Portable alkaline batteries will be transferred via enclosed conveyor to the hammermill, located in treatment building as shown on drawing ST16653-003. The treatment process is designed to separate out the following material streams as listed in Table 6:3 below:

Table 6:3: Recovered Material Streams from Treated Batteries		
Material Stream	**%**	**Fate**
Black mass	60	Recycling
Ferrous metal	25	Recycling
Non-ferrous metal	2	Recycling
Paper and plastic	13	Energy recovery

6.22 Batteries will be crushed using a hammermill. The resultant mixed material will pass over a drum magnet to remove any ferrous metal before being treated by a vibro-separator to remove the black mass fraction from the remaining material. The black mass will pass through the screen and will be collected in an enclosed conveyor and passed via a screw mechanism into sealed bags.

6.23 The remaining material will then pass over an eddy current separator which will repel the non-ferrous metal fraction, causing it to fly off the belt into a hopper and allowing it to be separately collected. The remaining paper and plastic fraction will be collected in a dedicated container.

6.24 The alkaline battery treatment plant will treat between 2.5 and 4.5 tonnes of batteries per hour, depending on the feedstock.

6.25 Recovered material streams will be stored in appropriate bags or stillages at the location shown on drawing ST16653-003.

7 DESIGN MEASURES TO PROVIDE ENVIRONMENTAL PROTECTION

General

7.1 The site and the infrastructure has been designed to provide environmental protection for land, water and air.

Groundwater and Surface Water Protection Measures

7.2 All areas where waste batteries and other wastes will be received, stored or treated will be provided with impermeable concrete surfacing that drains to a sealed drainage system.

7.3 The initial hazardous waste sorting operations will take place in a fully enclosed

building whilst the subsequent non-hazardous waste treatment plant will be located in a dutch barn style building (open on one side). However, the secondary treatment plant is an enclosed system and doesn't need to be in a fully enclosed building.

7.4 All water will drain to the sealed sump on site. The sump will be checked on a regular basis and will be emptied by tanker on a regular basis. Only clean rain water run-off from external areas and building roofs will drain to the River Calder. The site drainage is shown on drawing ST16653-003.

Air Quality Protection Measures

7.5 The system has been designed with lift tube and screw conveyors which generate much less dust than standard conveyor belts. The treatment process has been enclosed as far as possible to prevent fugitive emissions of dust or odour.

8 OPERATIONAL CONTROLS TO PROVIDE ENVIRONMENTAL PROTECTION

8.1 Without controls the amenity of the surrounding locality may be negatively impacted as a result of the storage and treatment of permitted wastes on site. However, operations will be undertaken in a manner compliant with relevant guidance and the EMS, ensuring good housekeeping and minimising any potential impacts. Further commentary is provided in the Accident and Amenity Risk Assessment.

Odour

8.2 Wastes accepted at the site are generally low odour and are not expected to cause any issues during receipt and storage. Waste treatment has been designed as an enclosed system in order to minimise any emissions.

8.3 Olfactory monitoring will be undertaken at the site boundary at least once a day by a trained member of staff to ensure that odour is not detectable.

8.4 If an odour problem is identified or a complaint received, the Site Manager shall be informed and investigations will be undertaken in order to identify the source of the odour and provide any necessary mitigation.

Noise

8.5 The sorting activity will be undertaken within an enclosed building, which will provide

noise attenuation. Further treatment will be carried out using enclosed equipment in a dutch barn style building.

8.6 In order to minimise noise all plant will be maintained in accordance with the manufacturer's recommendations and will be subject to regular servicing.

8.7 The site is located on an industrial estate with the closest residential receptor some 300m away. Treatment activities will be restricted to the working day and will not take place overnight.

Particulates

8.8 Particulate emissions of carbon black may arise from the operation of the hammermill and vibrating screen. In order to minimise the risk of particulates the system has been designed with state of the art conveyors which minimise disturbance of dust and the system will be fully housed or covered.

Leaks and Spillages

8.9 All plant and equipment will be serviced and maintained in accordance with the manufacturer's recommendations, minimising the risk of spills from site plant.

8.10 Any liquids stored on site for plant maintenance will be kept in appropriate lidded containers in bunds or drip trays.

8.11 The large on-site sump will provide sufficient capacity for the collection of fire water at the site. The sump has a capacity of up to 124m^3.

8.12 The sump and the drainage system will be inspected regularly and maintained as required so that they remain fit for purpose.

8.13 In the event that there is a spillage this will be contained using absorbent materials. Depending on the nature of the material the waste will be returned to the process or will be placed in a sealed container pending collection and removal to a permitted site.

9 MONITORING AND RECORD KEEPING

9.1 The site will be inspected on a daily basis with staff carrying out a visual and olfactory

assessment around the site boundary to check for emissions of contaminated run-off, odour and particulates.

9.2 Site inspections will include the condition of site infrastructure to check the condition of tanks, pipework and secondary containment infrastructure.

9.3 Should any issues be noted these will be raised with site management and appropriate remedial action will be agreed. Details of the inspection and any remedial action will be recorded in the site log.

9.4 The site log will be made available to warranted officers of the Environment Agency on request. Should any incident have the potential to cause significant emissions the Environment Agency will be informed by telephone and remedial action will be agreed with the local environment officer.

9.5 Records will also be kept on site, in either electronic or hard copy format, recording:

- pre-acceptance details for each waste stream;
- waste transfer notes or consignment notes for incoming and outgoing wastes;
- details of any rejected loads and any associated remedial action taken to prevent potential pollution;
- details of inspections of plant or infrastructure and any maintenance required;
- details of visits by the pest control contractor and any action taken; and
- details of any complaints received and the action taken to resolve them.

10 SITE CLOSURE PLAN

10.1 The Site Closure Plan has been developed to ensure the site will be safely decommissioned without causing pollution or harm and the site is returned to a satisfactory state, that is, a similar condition to that which existed prior to permit issue.

10.2 All raw materials will be removed from site in an appropriate manner. Where possible these will be returned to the supplier, possibly under a sale or return agreement, otherwise they will be sent for reuse or recycling at a suitable permitted facility.

10.3 Where possible, all waste materials will be processed through the plant and removed from site for recovery. All remaining wastes will be removed from site and will be

recycled or disposed of in accordance with the requirements of the The Waste (England and Wales) Regulations 2011, or the relevant waste legislation at the time of decommissioning.

10.4 Appropriate contingency plans will be in operation in case of any spillage/leak or fire of the materials or waste.

10.5 All process plant will be emptied and if necessary cleaned prior to dismantling to minimised the potential for fugitive emissions.

10.6 It is important that the drainage provisions are removed at the final stage of decommissioning, such that cleaning and other drainage water generated during the decommissioning process can be managed.

10.7 Soils samples will be undertaken, if appropriate, so that the condition of the site at decommissioning can be compared to that at commencement of the facility. However inspection and maintenance of the concrete surfacing at the site will be the main mechanism for ensuring no pollution occurs and where records show high standards of containment throughout the life of the site sampling may not be necessary.

10.8 The methodology used to decommission process plant, conveyors, pipework and other structures will minimise the impact of:

- noise;
- odour; and
- disturbance to the environment.

10.9 Protection of the environment will be a priority and no risk to air, land, water or human health will be experienced during closure and decommissioning of the site, which will be subject to the Environmental Management System requirements.

APPENDICES

Appendix 1

Summary of Environmental Management System

Certificate GB01/53024

The management system of

WasteCare Limited

Richmond House, Garforth, Leeds,
West Yorkshire, LS25 1NB, UK

has been assessed and certified as meeting the requirements of

ISO 14001:2015

For the following activities

Nationwide waste management and collection services including the handling, storage, recycling, recovery and treatment of hazardous, non-hazardous and packaging waste streams, and the provision of Producer Compliance Scheme services.

This certificate is valid from 26 February 2018 until 06 February 2021 and remains valid subject to satisfactory surveillance audits.
Re certification audit due before 06 February 2021
Issue 15. Certified since 03 September 2001

This is a multi-site certification.
Additional site details are listed on the subsequent page.

Expiry date of last certificate: 06 February 2018
End date of last recertification audit: 19 January 2018

Authorised by

SGS United Kingdom Ltd
Rossmore Business Park Ellesmere Port Cheshire CH65 3EN UK
t +44 (0)151 350-6666 f +44 (0)151 350-6600 www.sgs.com

HC SGS 14001 2015 0118 M2

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WasteCare Limited

ISO 14001:2015

Issue 15

Additional facilities

Waste Care, Willenhall Lane, Bloxwich, Birmingham, WS3 2XN, UK

WasteCare - Unit 1 Garalleena Park, Gorsey Lane, Widnes, WA8 0RN, UK

PackCare - Ravell House, Gelderd Road, Leeds, LS12 6DL, UK

WeeeCare, Richmond House, Garforth, Leeds, LS25 1NB, UK

WasteCare, Valley House, Knowsthorpe Lane, Leeds, West Yorkshire, LS9 0PH, UK

LogiCare, Tyrler Close, Normanton, Wakefield, WF6 1RL, UK

WasteCare, Units 4-9 Highfield, Lasham, Alton, Hampshire, GU34 5SQ, UK

WasteCare, Cornishway East, Gamlington Trading Estate, Taunton, Somerset, TA1 5LZ, UK

WasteCare, 4-10 Atcost Road, Barking, IG11 0EQ, UK

Muir Road, Houston Industrial Estate, Livingston, West Lothian, EH54 5DR, UK

Avonmouth Treatment Facility, Avonmouth Way West, Avonmouth, Bristol, BS11 9HD, UK

Liverpool Treatment Facility, 2 Lower Bank View, Merseyside, L20 8PT, UK

Unit 1, North Dean Business Park, Halifax, Yorkshire, HX4 8LR, UK

UKAS MANAGEMENT SYSTEMS
0005

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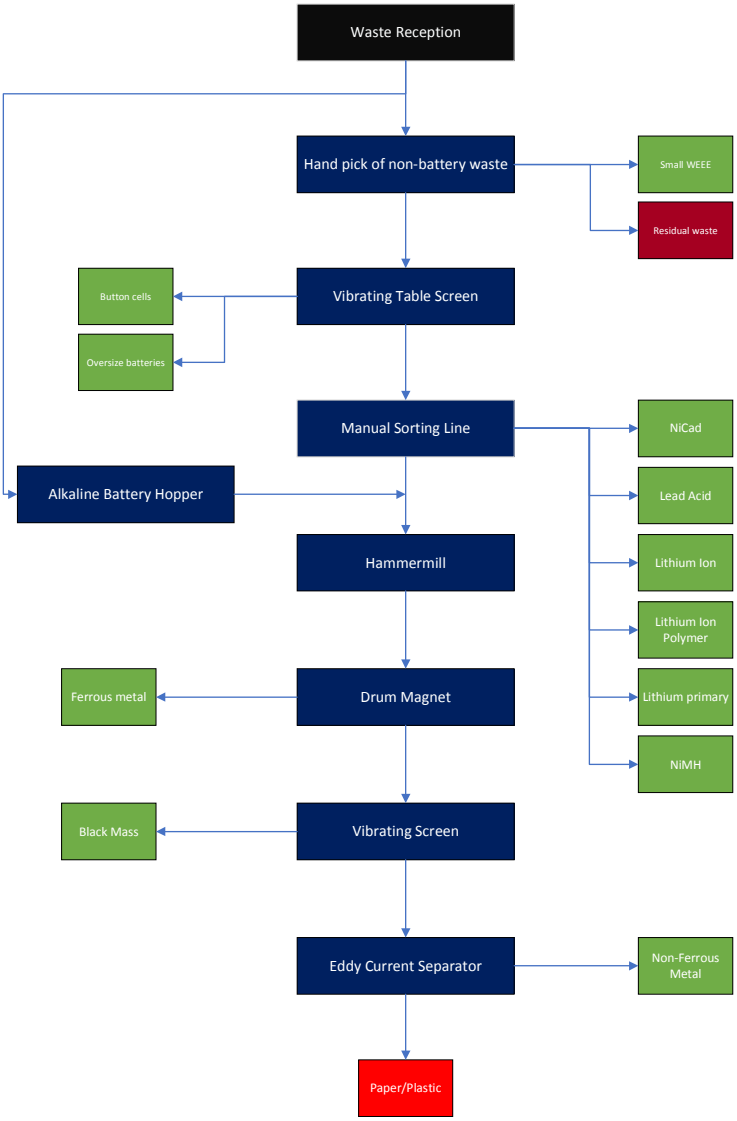
Appendix 2

Process Flow Diagram


Waste Reception
Hand pick of non-battery waste
Small WEEE
Residual waste
Vibrating Table Screen
Button cells
Oversize batteries
Manual Sorting Line
NiCad
Lead Acid
Lithium Ion
Lithium Ion Polymer
Lithium primary
NiMH
Alkaline Battery Hopper
Hammermill
Drum Magnet
Ferrous metal
Vibrating Screen
Black Mass
Eddy Current Separator
Non-Ferrous Metal
Paper/Plastic

BAT ASSESSMENT

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ENERGY AND CLIMATE CHANGE
ENVIRONMENT AND SUSTAINABILITY
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MINING AND MINERAL PROCESSING
MINERAL ESTATES
WASTE RESOURCE MANAGEMENT

WASTECARE LIMITED

BATTERY TREATMENT FACILITY, HALIFAX

ASSESSMENT OF BEST AVAILABLE TECHNIQUES (BAT) AND BEST AVAILABLE TREATMENT, RECOVERY AND RECYCLING TECHNIQUES (BATRRT)

DECEMBER 2018

wardell armstrong

CONTENTS

TABLES

1 INTRODUCTION

1.1 Wastecare Limited are applying for a bespoke installation permit at Units 1-6 North Dean Business Park, Stainland Road, Halifax, HX4 8LR. The site location and proposed permit boundary of the facility are shown on drawings ST16653-001 and ST16653-002 respectively.

1.2 The facility will sort batteries into their different chemistries. Alkaline batteries and batteries with zinc or manganese chemistry (referred to as alkaline batteries in this application) will then be deconstructed in a hammermill to facilitate the recovery of four fractions, specifically ferrous metal, non-ferrous metal, mixed paper and plastic and black mass. The other types of batteries separated into their different types will be sent for offsite recycling and recovery. This includes batteries containing fluids, e.g. lead acid batteries, will not be treated on site but will be bulked up for treatment elsewhere.

1.3 The facility will accept up to 25,000 tonnes per annum of hazardous and non-hazardous batteries. A full list of the battery types that may be accepted on site is given in the Operating Techniques.

1.4 The storage and treatment (sorting) of mixed batteries (hazardous waste) of more than 10 tonnes per day means this activity falls under Schedule I Part II of the Environmental Permitting (England and Wales) Regulations 2016, making it an 'installation':

Section 5.3 Part A(1) (a)
Disposal or recovery of hazardous waste with a capacity exceeding 10 tonnes per day involving one or more of the following activities—
(ii) physico-chemical treatment

Section 5.6 Part A(1) (a)
Temporary storage of hazardous waste with a total capacity exceeding 50 tonnes pending any of the activities listed in Sections 5.1, 5.2, 5.3

1.5 The permit application also includes a new waste operation activity for the mechanical treatment of non-hazardous alkaline batteries.

1.6 Treatment of batteries will be carried out in accordance with Best Available Techniques. Furthermore, small items of waste electrical and electronic equipment (WEEE) will also be accepted at the site. These will be treated to remove the batteries and sort them for recycling. Treatment of WEEE is carried out using Best Available Treatment, Recovery and Recycling Techniques (BATRRT).

1.7 The treatment and storage of waste batteries will also comply with Part A of Annex III to the Batteries Directive, specifically: treatment and storage areas will have impermeable surfaces with weatherproof covering in appropriate areas or suitable containers. The recycling process is designed to allow battery recycling through the site to meet the efficiency required by Annex III, Part B of the Batteries Directive, that is recycling at least 65% by average weight of lead-acid batteries, 75% by average weight of nickel cadmium batteries and 50% by average weight of other batteries.

1.8 Wastecare Limited currently operate an authorised WEEE treatment facility operating under a Standard Rules permit (SR2008 No.23) reference EPR/MP3899VT. This will be retained for the pilot plant in Unit 4.

1.9 As the facility is classed as an installation, it must utilise the Best Available Techniques (BAT) for minimising emissions and impacts on the environment. This requires as a minimum compliance with the Environment Agency's Sector Guidance Note 5.06 "Guidance for the Recovery and Disposal of Hazardous and non-hazardous Waste," which sets out indicative BAT for waste treatment facilities. This report also includes a section on compliance with the updated BREF for waste treatment providing a commentary against the 53 conclusions published in August 2018.

1.10 The facility will also comply with Guidance on Best Available Treatment, Recovery and Recycling Techniques (BATRRT) and treatment of Waste Electrical and Electronic Equipment (WEEE) published jointly by the Department for Environment, Food and Rural Affairs, the Welsh Assembly Government and the Scottish Executive. BATRRT is the extension of the principles of BAT to systems that provide for the recovery, recycling and treatment (RRT) of WEEE and Annex II to the WEEE Directive requires that, batteries must be removed from any separately collected WEEE.

1.11 In determining the best available techniques, special consideration has been given to

the following matters listed in Annex IV to the IPPC Directive:

i. the use of low-waste technology;
ii. the use of less hazardous substances;
iii. the furthering of recovery and recycling of substances generated and used in the process and of waste, where appropriate;
iv. comparable processes, facilities or methods of operation, which have been tried with success on an industrial scale;
v. technological advances and changes in scientific knowledge and understanding;
vi. the nature, effects and volume of the emissions concerned;
vii. the commissioning dates for new or existing installations;
viii. the length of time needed to introduce the best available technique;
ix. the consumption and nature of raw materials (including water) used in the process and their energy efficiency;
x. the need to prevent or reduce to a minimum the overall impact of the emissions on the environment and the risks to it;
xi. the need to prevent accidents and to minimize the consequences for the environment; and
xii. the information published by the Commission pursuant to Article 16 (2) or by international organisations.

2 BATTERIES IN WEEE

2.1 Small mixed WEEE (SMW) may be accepted on site. Wherever possible the batteries will be removed from the WEEE in a manner that does not contaminate the remaining material streams. It is relatively easy to remove batteries from most appliances, such as mobile telephones and cordless tools and all such batteries will be removed from the WEEE.

2.2 Wherever possible the battery will be removed intact and in such a way that it is clearly recognisable as a battery. Removed batteries will be stored in appropriate labelled containers alongside other batteries of that type.

2.3 However, the location of the battery in the equipment may dictate at what point the battery can be removed. Some equipment will contain a small battery on a circuit

board or the battery may be located in a manner that makes it difficult to remove the battery without damaging the WEEE and causing contamination.

2.4 Where necessary small WEEE will be passed on to a specialist recycling outlet in order to ensure that batteries or other components are not damaged during the process. This will ensure that no pollutants are released, which could cause pollution of the environment or contaminate the recovered materials preventing recycling.

3 ASSESSMENT AGAINST INDICATIVE BAT

3.1 Table 3.2 sets out the materials that may be accepted on site. Batteries may be accepted pre-sorted or in mixed loads. Initially mixed waste streams will be sorted portable, automotive and industrial batteries. They will also be sorted into the different streams listed in Table 3.1.

Table 3:1: Battery Types to be Accepted

Description	Includes	Classification
Zinc/manganese (often referred to a s alkaline batteries)	Alkaline Zinc chloride Zinc air Oversize zinc/manganese	Non-hazardous
NiCad	Dry NiCad Wet NiCad	hazardous
Lead Acid	Dry (VRLA – plastic case) Dry-Cylon (steel case) Wet	hazardous
Lithium Ion	Laptop and cells Power tools Mobile phones Video cameras E-cigarettes	Non-hazardous
Lithium Ion Polymer	Tablet/laptop Mobile phone	Non-hazardous
Lithium primary	Coin cells Non-coin cells	Non-hazardous
Nickel Metal Hydride (NiMH)	All sizes	Non-hazardous
Button cells	Zinc air	hazardous

Table 3:1: Battery Types to be Accepted		
Description	**Includes**	**Classification**
	Silver oxide Alkaline	
Non-battery material	Small WEEE Water filters Light bulbs (including CFL) Printer ink cartridges General litter (incidental to battery loads only)	Non-hazardous, except compact fluorescent lamps, which are hazardous

3.2 The second phase of treatment treats only the non-hazardous portable alkaline batteries to separate the different components for recovery, i.e.:

- Black mass;
- Ferrous metals
- non-ferrous metals; and
- Paper and plastic.

3.3 Tables 3.2 to 3.14 provide a commentary of how the treatment operations meet the relevant standards set out in SGN 5.06.

Table 3:2: Compliance with Indicative BAT for Pre-Acceptance of Wastes	
Indicative BAT requirements for Pre-Acceptance	**Compliance with Indicative BAT requirements**
From the waste disposal enquiry, the Operator should obtain information in writing relating to: • the type of process producing the waste • the specific process from which the waste derives • the quantity of waste; • chemical analysis of the waste (individual constituents and as a minimum their percentage compositions) • the form the waste takes (solid, liquid, sludge etc) • hazards associated with the waste • sample storage and preservation techniques	All wastes will be assessed for suitability of acceptance by an appropriately trained member of staff. In order to ensure that wastes which arrive at the site are acceptable under the permit, waste enquiry forms will be completed by the customer for each new waste stream. The forms will ascertain: • Producer and customer contact details; • Waste type; • Composition of the waste (battery types); • List of wastes (European Waste Catalogue (EWC)) code of the waste; • Waste quantity; Wastes acceptable at the site are detailed in the Operating Techniques document.
Unless a sample and analysis has already been completed by a third party and the Operator has sufficient written information from them, then the Operator should in every case obtain representative sample(s) of the waste from the production process/current holder and compare it against the written description to ensure that it is consistent.	The waste types to be accepted on site are single stream or mixed batteries. Most will come from other Wastecare sites across the UK. Other suppliers of batteries will be required to provide representative samples for analysis or other evidence, such as technical data or pictures, to allow an accurate assessment of the waste type before Wastecare will agree to the batteries being delivered, thus ensuring that their composition is known and that they are appropriate for treatment.
The Operator should ensure that the sample is representative of the waste and has been obtained by a person who is technically competent to undertake the sampling process.	Where they are necessary Wastecare Limited staff will require that samples of waste are representative, i.e. taking into account any variation in the waste. Waste samples will be obtained by a person who is technically competent to undertake the sampling process.
Wastes should not be accepted at the installation without a clear method or defined treatment and disposal route being determined in advance and costed before the waste is accepted at the installation.	Through the pre-application procedures, set out above, Wastecare Limited is able to confirm whether waste delivered to site falls within the permitted waste types and quantities and is suitable for acceptance and treatment at the site.
There must be a clear distinction between sales and technical staff roles and responsibilities. If non-technical sales staff are involved in waste disposal enquiries, then a final technical assessment prior to approval should be made. It is this final technical checking that should be used to avoid build-up of accumulations of wastes.	Only suitably qualified staff are authorised to undertake technical assessments. Wastecare Limited employs qualified and experienced individuals who are competent to undertake the assessments of proposed waste streams.

Table 3:2: Compliance with Indicative BAT for Pre-Acceptance of Wastes	
Indicative BAT requirements for Pre-Acceptance	**Compliance with Indicative BAT requirements**
All records relating to pre-acceptance should be maintained at the installation for cross-reference and verification at the waste acceptance stage. These records should be kept for a minimum of 3 years.	Records of enquiries will be kept for at least 3 years. These records will be available in the site office.

Table 3:3: Compliance with Indicative BAT for Waste Acceptance	
Indicative BAT requirements for acceptance procedures when waste arrives at the installation	**Compliance with Indicative BAT requirements**
On arrival loads should: • be weighed, unless alternative reliable volumetric systems linked to specific gravity data are available • not be accepted into site unless sufficient storage capacity exists and site is adequately manned to receive waste • have all documents checked and approved, and any discrepancies resolved before the waste is accepted	Incoming wastes will have their weights recorded from the transfer note. All waste deliveries will be recorded in the computerised recording system. Wastes will not be accepted at the site unless there is sufficient storage capacity and the site is adequately manned. Transfer documentation will be checked by a site operative on arrival at the site. Hazardous wastes will be accompanied by consignment notes.
Hazardous wastes should only be received under the supervision of a suitably qualified person (HNC qualified chemist or higher)	Wastecare Limited's staff will have sufficient competence and training to supervise all hazardous wastes deliveries. The hazardous waste will comprise mixed batteries, predominantly from other Wastecare facilities and extensive testing is unlikely to be required. Wastes will be visually inspected on the delivery vehicle before being consented to be deposited in the waste reception area. Acceptance of waste will be supervised by trained Wastecare Limited staff.
Visual inspection. Where possible, confirmatory checks should be undertaken before offloading where safety is not compromised. Inspection must in any event be carried out immediately upon offloading at the installation.	All loads will be subject to visual inspection to ensure it appears in line with the pre-acceptance information both before it is unloaded and when it is deposited in the waste reception area.
Check every container to confirm quantities against accompanying paperwork. All containers should be clearly labelled and should be equipped with well-fitting lids, caps and valves secure and in place. Any damaged, corroded or unlabelled drums should be put into a quarantine	All loads will be inspected during unloading and visual observation will identify the condition of wastes arriving on site. Any non-conforming waste will be put into a quarantine area and dealt with appropriately. Quantities will be compared against paperwork that is provided by the vehicle driver and against the pre-acceptance information provided by the customer.

Table 3:3: Compliance with Indicative BAT for Waste Acceptance	
Indicative BAT requirements for acceptance procedures when waste arrives at the installation	**Compliance with Indicative BAT requirements**
area and dealt with appropriately. Following inspection, the waste should then be unloaded into a dedicated sampling/reception area.	Damaged packaging may not prevent wastes from being safely stored and treated. The reception area comprises impermeable pavement with sealed drainage. Lead acid and wet alkaline NiCad batteries will be considered as incompatible and though they may be accepted together and will be sorted without delay and stored separately.
The inspection, unloading and sampling areas should be marked on a plan and have suitably sealed drainage systems.	The site layout plan ST16653-003 shows the waste reception area. Areas of waste reception are provided with sealed drainage as shown on drawing ST16653-005.
Sampling - checking - testing of wastes - storage Other than pure product chemicals and laboratory smalls, no wastes should be accepted at the installation without sampling, checking and testing being carried out. Reliance solely on the written information supplied is not acceptable, and physical verification and analytical confirmation are required. All wastes, whether for on-site treatment or simply storage, must be sampled and undergo verification and compliance testing.	Permitted wastes include loads of single steam or mixed batteries. Assessments at the pre-acceptance stage will confirm that waste streams are suitable for acceptance at the site. Regardless, visual inspections of waste deliveries will be undertaken of every load that arrives at the site.
The Operator should ensure that waste delivered to the installation is accompanied by a written description of the waste describing: • the physical and chemical composition • hazard characteristics and handling precautions • compatibility issues • information specifying the original waste producer and process	Wastecare will not accept a waste load unless it is accompanied by a full written transfer note or consignment note as required in accordance with the Waste (England and Wales) Regulations 2011 and the Hazardous Waste (England and Wales) Regulations 2005. Such a description will include: • the physical and chemical composition • hazard characteristics and handling precautions • information specifying the original waste producer and process
On-site verification and compliance testing should take place to confirm: ▪ identity of the waste ▪ description of the waste ▪ consistency with pre-acceptance information and proposed treatment method ▪ compliance with permit	Transfer documentation will be reviewed, and visual observations undertaken to ensure consistency with pre-acceptance information and compliance with permit conditions. Further verification testing is not required.

Table 3:3: Compliance with Indicative BAT for Waste Acceptance	
Indicative BAT requirements for acceptance procedures when waste arrives at the installation	**Compliance with Indicative BAT requirements**
The Operator should have clear and unambiguous criteria for the rejection of wastes, together with a written procedure for tracking and reporting such non-conformance. This should include notification to the customer/waste producer and the Regulator. Written/computerised records should form part of the waste tracking system information.	Wastes will only be accepted where they comply with the six figure waste codes listed in the environmental permit. Where waste is not in compliance the load will be rejected and will be returned to the waste producer where possible. Where this is not possible the waste will be directed to the quarantine area and arrangements will be made for it to be removed to a permitted site as soon as possible. The waste producer will be notified if waste is rejected from site. Records of rejected wastes will be made in the recording system.
Documentation provided by the driver, written results of acceptance analysis, details of offloading point or off-site transfer location should be added to the tracking system documentation.	A tracking system will be in place confirming all loads of waste accepted on site and whether they were treated on site or segregated for recycling elsewhere.
Wastes must not be deposited within a reception area without adequate space.	Wastes will only be accepted at the site if there is sufficient space within the waste reception area. The waste reception area provides sufficient capacity for the storage of 50 tonnes of batteries and WEEE.
Should the inspection or analysis indicate that the wastes fail to meet the acceptance criteria, then such loads should be stored in a dedicated quarantine area and dealt with appropriately. Such storage should be for a maximum of five working days. Written procedures should be in place for dealing with wastes held in quarantine, together with a maximum storage volume.	Should non-conforming waste be delivered to the site it will be held in the quarantine area, where it will remain isolated before removal from site. Storage of quarantined wastes will be limited to a maximum of five working days. Non-conforming wastes will be removed from site to an appropriately permitted facility as soon as possible, maintaining the space available. The Operating Techniques report provides the written procedures for dealing with wastes held in quarantine.
If the cause of failure to meet acceptance criteria is due to incompatibility, then the wastes should be segregated immediately to remove the hazard.	Loads are received separately and are not sorted until the waste acceptance procedure has been completed. Lead acid and wet alkaline NiCad batteries will be considered as incompatible and though they may be accepted together they will be sorted without delay and will be stored separately.
Waste Rejection procedures The operator should have clear and unambiguous criteria for the rejection of wastes, together with a written procedure for tracking and reporting such non-conformance. This should include notification to the customer/waste producer and the Environment Agency.	Wastecare Limited has clearly defined criteria for the rejection of wastes within the Environmental Management System for the site. Wastes will be isolated and removed from site as described above.

Table 3:3: Compliance with Indicative BAT for Waste Acceptance	
Indicative BAT requirements for acceptance procedures when waste arrives at the installation	**Compliance with Indicative BAT requirements**
Written/computerised records should form part of the waste tracking system information. The operator should also have a clear and unambiguous policy for the subsequent storage and disposal of such rejected wastes. This policy should achieve the following: • identifies the hazards posed by the rejected wastes • labels rejected wastes with all information necessary to allow proper storage and segregation arrangements to be put in place • segregates and stores rejected wastes safely pending removal.	When a load is rejected the Environment Agency and the waste producer will be informed. All data required for regulatory and tracking purposes will be recorded. Further information is provided in the Operating Techniques report.
Records The waste tracking system should hold all the information generated during pre-acceptance, acceptance, storage, treatment and/or removal off-site. Records should be made and kept up to date on an ongoing basis to reflect deliveries, on-site treatment and despatches. The tracking system should operate as a waste inventory/stock control system and include as a minimum: • date of arrival on-site • producers details • all previous holders • a unique reference number for waste • pre-acceptance and acceptance analysis results • package type and size • intended treatment/disposal route • record accurately the nature and quantity of wastes held on site, including all hazards and identification of primary hazards • where the waste is physically located in relation to a site plan • where the waste is in the designated disposal route • identification of operator's staff who have taken any decisions re. acceptance or rejection of waste streams and decided upon recovery/disposal options	Records will be kept of each load arriving on site including details of: • date of arrival on-site • producers details • all previous holders • a unique reference number for waste • pre-acceptance and acceptance analysis results • package type and size • intended treatment/disposal route • record accurately the nature and quantity of wastes held on site, including all hazards and identification of primary hazards • where the waste is physically located in relation to a site plan • where the waste is in the designated disposal route • identification of operator's staff who have taken any decisions re. acceptance or rejection of waste streams and decided upon recovery/disposal options Records will be kept on site, in either electronic or hard copy format and stored within the site office. The tracking system will be kept up-to date on an ongoing basis to reflect deliveries, on-site treatment and dispatches.

Table 3:3: Compliance with Indicative BAT for Waste Acceptance	
Indicative BAT requirements for acceptance procedures when waste arrives at the installation	**Compliance with Indicative BAT requirements**
All records relating to pre-acceptance should be maintained and kept readily available at the installation for cross-reference and verification at the waste acceptance stage. Records should be held for a minimum of two years after the waste has been treated or removed off-site. Records should be held in an area well removed from hazardous activities to ensure their accessibility during any emergency.	All records will be held electronically or in a hard copy format. Access to records will be in the site office. Records will be held for a minimum of 2 years.
The system adopted should be capable of reporting on all of the following: • total quantity of waste present on-site at any one time, in appropriate units, for example, 205 litre drum equivalents •breakdown of waste quantities being stored pending on-site treatment, classified by treatment route • breakdown of waste quantities on-site for storage only, that is, awaiting onward transfer • breakdown of waste quantities by hazard classification • indication of where the waste is located on site relative to a site plan • comparison of the quantity on site against total permitted • comparison of time the waste has been on-site against permitted limit These records should be held in a designated area, away from hazardous activities to ensure their accessibility during any emergency	Wastecare Limited's computerised records system will be capable of reporting on the following: • total quantity of waste present on-site at any one time and storage method • breakdown of waste quantities being stored pending on-site treatment, classified by treatment route • breakdown of waste quantities on-site for storage only, that is, awaiting onward transfer • breakdown of waste quantities by hazard classification • indication of where the waste is located on site relative to a site plan • comparison of the quantity on site against total permitted • comparison of time the waste has been on-site against permitted limit These records will be held in the site office. This location is considered to be accessible during any emergency.
Back-up copies of computer records should be maintained off-site.	All records are available to be viewed via the computer-based recording system. The system will be backed up regularly to ensure that records continue to be available.
General Wastes should not be accepted at the installation without a clear defined method of recovery or disposal being determined and costed and ensuring there is sufficient capacity being available. These checks should be performed before the waste acceptance stage is reached.	Pre-acceptance checks will confirm that the wastes are suitable for treatment on site.
The Operator should ensure that the installation personnel who may be involved in the sampling, checking and analysis procedures are suitably	Sampling, checking or analysis of waste will be undertaken by suitably qualified staff if required. Staff will be suitably trained for their role.

Table 3:3: Compliance with Indicative BAT for Waste Acceptance	
Indicative BAT requirements for acceptance procedures when waste arrives at the installation	**Compliance with Indicative BAT requirements**
qualified (HNC qualified chemist or higher) and adequately trained, and that the training is updated on a regular basis.	
There must be a clear distinction between sales and technical staff roles and responsibilities. If non-technical sales staff are involved in waste enquiries then a final technical assessment prior to approval should be made. It is this final technical checking that should be used to avoid build-up of accumulations of wastes and to ensure that sufficient capacity exists.	Only Wastecare Limited's qualified technically competent staff will be permitted to carry out the technical assessment of potential waste deliveries to the site. Technical staff will also ensure that sufficient capacity exists at the site prior to delivery of the waste load.

Table 3:4: Compliance with Indicative BAT for Storage of Wastes	
Indicative BAT requirements for storage	**Compliance with Indicative BAT requirements**
Offloading/discharge of waste The Operator should have in place a system to ensure that the correct discharge point or storage area is used. The options for this include: • ticket systems • supervision by site staff and if relevant CCTV • keys	Wastecare Limited personnel are responsible for supervising the offloading of each waste delivery into the reception area. All deliveries will be supervised by Wastecare Limited personnel. Further information is provided in the Operating Techniques report.
Offloading and quarantine points should have an impervious surface with self-contained drainage, to prevent any spillage entering the storage systems or escaping off-site	All site operations will take place in areas provided with impermeable concrete flooring and sealed drainage system. External areas of the site direct any water to a sealed sump.
Record keeping The Operator should have an internal tracking system which should satisfy the objectives and minimum standards.	Records will be maintained within a computerised recording system.
All spillages of hazardous wastes should be logged, where spillages >200 litre then additionally the Regulator should be informed.	Spillages on site of any hazardous wastes in liquid or powder form will be recorded in the site log. Any such spillage of over 200 litres will formally be reported to the EA. This is considered to be very unlikely as batteries will not be drained on site. Batteries containing significant quantities of fluid will be sent on intact for recycling elsewhere.
Turnover	Waste deposited in the waste reception area will be transferred for temporary storage or treatment within 5 days.

Table 3:4: Compliance with Indicative BAT for Storage of Wastes	
Indicative BAT requirements for storage	**Compliance with Indicative BAT requirements**
Storage within the reception area should be for a maximum of five working days. Following receipt, wastes should be treated or removed off-site as soon as possible. The total storage time will depend upon the characteristics of a particular site and the waste types being stored. For example, on a site in a sensitive location handling hazardous wastes, it may be appropriate to limit storage times to one month. Other non-hazardous wastes, however, may be held on-site for longer periods. However, all waste should be treated or removed off site within a maximum of six months from the date of receipt.	Wastes awaiting treatment will be stored on site for up to six months. Recovered wastes will be stored on site for up to 36 months pending their removal from site.
Transfer from tanker, drums and other containers in bulk storage If flammable chemicals are being transferred, particular caution has to be taken to avoid the generation of static electricity, with the subsequent risk of ignition. Guidance on the safe use and handling of flammable liquids is provided by the Health and Safety Executive and is contained within HSG140, including Guidance on the issue of static electricity build-up. There may be other regulatory requirements to consider such as the Dangerous Substances and Explosive Atmospheres Regulations.	Flammable liquids will not be stored on site.
Bulk Storage Vessels Bulk storage vessels should be located on an impervious surface that is resistant to material being stored, with sealed construction joints within a bunded area with a capacity at least 110% of the largest vessel or 25% of the total tankage volume, whichever is the greater.	Containers of batteries will be held on impermeable pavement. There will be no bulk storage of liquid wastes.
Vessels should not be used beyond the specified design life or used in a manner or for substances that they were not designed, Vessels should be inspected at regular intervals, with written records kept to prove that they remain fit for purpose. See HSE Guidance Note PM75.	Containers will be inspected on a regular basis to ensure that they remain fit for purpose. Containers will be repaired or replaced as necessary to ensure that they do not leak.
No open-topped tanks should be used for storage or treatment of hazardous or liquid wastes. Exceptions would require justification.	Hazardous wastes will be stored inside or in covered containers. Liquid wastes will not be stored on site.
No uncontrolled venting to atmosphere should be allowed, and all vents should be linked to suitable scrubbing and abatement systems.	The treatment system will be enclosed and there will be no emissions to atmosphere.

Table 3:4: Compliance with Indicative BAT for Storage of Wastes	
Indicative BAT requirements for storage	**Compliance with Indicative BAT requirements**
Pipework should preferably be routed above ground; if below ground it should be contained within suitable inspection channels.	There will be no connecting pipework within the treatment process
All vessels should be clearly signed as to their contents and capacity and should have a unique identifier. Tanks should be appropriately labelled.	All bulk containers will be clearly signed as to their contents and capacity and should have a unique identifier.
A suitable pipework coding system should be used, for example, RAL European standard colour coding.	Plans will be provided for surface water and foul water systems and these will be clearly identifiable on site.

Table 3:5: Compliance with Indicative BAT for Treatment	
Indicative BAT for treatment	**Compliance with Indicative BAT requirements**
Provide adequate process descriptions of the activities and the abatement and control equipment for all of the activities such that the Regulator can understand the process in sufficient detail to assess the operator's proposals and in particular to be able to assess opportunities for further improvements. This should include: • diagrams of the main plant items where they have environmental relevance, for example, storage, tanks, treatment and abatement plant design, etc. • details of chemical reactions and their reaction kinetics/energy balance • equipment inventory, detailing plant type and design parameters, for example, flashpoints • waste types to be subjected to the process • control system philosophy and how the control system incorporates environmental monitoring information • process flow diagrams (schematics) • venting and emergency relief provisions • summary of operating and maintenance procedures • a description of how protection is provided during abnormal operating conditions such as, runaway reactions, unexpected releases, start-up,	A description of the waste types, process and the pollution prevention measures are provided in the Operating Techniques report.

Table 3:5: Compliance with Indicative BAT for Treatment	
Indicative BAT for treatment	**Compliance with Indicative BAT requirements**
momentary stoppages and shut-down for as long as is necessary to ensure compliance with release limits in Permits • additionally, for some applications, it may be appropriate to supply process instrumentation diagrams for systems containing potentially polluting substances	

Table 3:6: Compliance with Indicative BAT for Point Source Emissions to Air	
Indicative BAT for point source emissions to air	**Compliance with Indicative BAT requirements**
Vent and chimney heights should be assessed for dispersion capability and an assessment made of the fate of the substances emitted to the environment.	There are no point source emissions to air from the facility.

Table 3:7: Compliance with Indicative BAT for Emissions to Surface Water and Sewer	
Indicative BAT requirements for control of point source emissions to surface water and sewer	**Compliance with Indicative BAT requirements**
The following general principles should be applied in sequence to control emissions to water: • water use should be minimised and wastewater reused or recycled • contamination risk of process or surface water should be minimised	Water is not used in the treatment process and no water will be discharged to directly surface water or sewer from the site. All site drainage will drain to the surface water sump, from where it will be removed by a registered waste carrier. Should there be a spillage of waste externally, any spilt liquids will flow to the sump. The sump will be inspected weekly and following any spillage and will be pumped out as necessary. The concrete surfacing and sealed drainage system will prevent any emissions to surface water or groundwater.

Table 3:8: Compliance with Indicative BAT for Fugitive Emissions to Air	
Indicative BAT for fugitive emissions to air	**Compliance with Indicative BAT requirements**
The control of fugitive emissions to air other than odour	There is no risk of litter from the treatment operations at the site. Wastes are accepted in containers and are subject to the initial sort inside an enclosed building. Following treatment materials are stored in enclosed containers pending recycling or recovery.

Table 3:9: Compliance with Indicative BAT for Odour	
Indicative BAT for odour	**Compliance with Indicative BAT requirements**
Where odour releases are expected to be acknowledged in the Permit, (i.e. contained and treated prior to discharge or discharged for atmospheric dispersion): • For existing installations, the releases should be modelled to demonstrate the odour impact at sensitive receptors. The target should be to minimise the frequency of exposure to ground level concentrations that are likely to cause annoyance. • Where there is no history of odour problems then modelling may not be required although it should be remembered that there can still be an underlying level of annoyance without complaints being made.	Odour will be controlled at source by good operational practices, the correct use and maintenance of plant, and operator training. No odour modelling is required as there are no emissions of malodorous air from the facility.
The objective is to prevent emissions of odorous releases that are offensive and detectable beyond the site boundary. This may be judged by the likelihood of complaints. However, the lack of complaint should not necessarily imply the absence of an odour problem.	Good operational practices, the correct use and maintenance of plant, and operator training ensure that the potential for malodorous emissions are minimised.
Assessment of odour impact should cover a range of reasonably foreseeable odour generation and receptor exposure scenarios, including emergency events and the effect of different mitigation options.	Emissions of odour are expected to be insignificant. Electrolytes will be contained within the enclosed treatment system and will be passed into the sealed containers with the black mass.
A record must be kept of any complaints relating to odour from the site.	Records will be kept regarding any complaints received and associated investigation and mitigation.

Table 3:10: Compliance with Indicative BAT for Management	
Indicative BAT for management	**Compliance with Indicative BAT requirements**
Operations and maintenance Effective systems should be employed on all aspects of the process, in particular: ▪ documented procedures that may have an adverse effect on the environment ▪ documented procedures for monitoring emissions or impacts ▪ a preventative maintenance programme to include regular inspection of any tanks, pipework, retaining walls, bunds or filters	Wastecare Limited will operate the facility in accordance with an Environmental Management System accredited to ISO 14001. A preventative maintenance programme will be in place with all site infrastructure and equipment inspected on a regular basis and serviced in accordance with the manufacturer's recommendations. Records will be kept of all inspections and any necessary repairs or maintenance will be noted, with timescales for these to be carried out.
Competence and training Training systems should be in place for relevant staff which cover: ▪ awareness of the regulatory implications of the permit for the activity and their work activities ▪ awareness of environmental effects from operation under normal and abnormal circumstances ▪ awareness of the need to report deviation from the permit ▪ prevention of, and handling of, accidental emissions The skills and competencies necessary for key posts should be documented and records of training needs and training received for these posts maintained.	All staff will be trained with regards to the Environmental Permit and Environmental Management System ensuring that they have an understanding commensurate with their post. A record will be kept of the skills necessary for each role and training needs will be assessed on an annual basis with additional training being provided where needed.
Accidents/incidents/non-conformance There should be an accident plan which: ▪ identifies the likelihood and consequences of accidents ▪ identifies actions to prevent accidents and mitigate consequences	An Amenity and Accident Risk Assessment has been included with the application. The potential environmental risks associated with the site have been identified and measures are in place to minimise to these risks and to mitigate against incidents should they occur.
There should be written procedures for handling, investigating, communicating and reporting actual or potential noncompliance with operating procedures or emission limits.	The EMS will include written procedures for handling, investigating, communicating and reporting actual or potential non-compliance with operating procedures or emission limits. Details of any complaints received, and the actions taken to resolve them will be recorded in the Site Log.

Table 3:10: Compliance with Indicative BAT for Management	
Indicative BAT for management	**Compliance with Indicative BAT requirements**
There should be written procedures for handling, investigating, communicating and reporting environmental complaints and implantation of appropriate action.	The EMS includes written procedures for handling, investigating, communicating and reporting environmental complaints and implantation of appropriate action.
There should be written procedures for investigating incidents, (and near misses) including identifying suitable corrective action and following up.	The EMS will include written procedures for investigating incidents, (and near misses) including identifying suitable corrective action and following up.
Organisation There should be an environmental policy/programme which: ▪ includes a commitment to continual improvement and prevention of pollution ▪ includes a commitment to comply with relevant legislation and other requirements to which the organisation subscribes; and ▪ identifies, sets, monitors and reviews environmental objectives and key performance indicators independently of the permit	Wastecare Limited has an environmental policy which: • includes a commitment to continual improvement and prevention of pollution; • includes a commitment to comply with relevant legislation and other requirements to which the organisation subscribes; and • identifies, sets, monitors and reviews environmental objectives and key performance indicators independently of the permit.
The company should have demonstrable procedures (e.g. written instructions) which incorporate environmental considerations into the following areas: ▪ the control of process and engineering change on the installation; ▪ design, construction and review of new facilities and other capital projects; ▪ capital approval; and ▪ purchasing policy	Wastecare Limited's Environmental Management System will include procedures for the incorporation of environmental considerations into engineering changes, capital approval and purchasing. Environmental issues will be a factor in purchasing of equipment and any infrastructure improvements, ensuring high levels of protection. Where possible equipment offering better energy efficiency and lower emissions will be selected.
The company should conduct audits, at least annually, and preferably independently, to check that all activities are being carried out in conformity with requirements.	Site operations will be audited on an annual basis to confirm compliance with the written procedures, review progress and set targets for continuing improvement over the coming year.
The company should operate a formal Environmental Management System. Preferably this should be a registered or certified EMAS/ISO14001 system (issued and audited by an accredited certification body).	The site will be operated in accordance with an Environmental Management System (EMS), which meets the requirements of the Environment Agency's Guidance (https://www.gov.uk/guidance/develop-a-management-system-environmental-permits).
The company should have a clear and logical system for keeping records of, amongst others: ▪ policies	Records will be maintained on the computerised recording system. This will include: ▪ policies ▪ roles and responsibilities

Table 3:10: Compliance with Indicative BAT for Management	
Indicative BAT for management	**Compliance with Indicative BAT requirements**
▪ roles and responsibilities ▪ targets ▪ procedures ▪ results of audits ▪ results of reviews	▪ targets ▪ procedures ▪ results of audits ▪ results of reviews

Table 3:11: Compliance with Indicative BAT for Raw Materials	
Indicative BAT for Raw Materials	**Compliance with Indicative BAT requirements**
The Operator should maintain a list of raw materials and their properties as noted above.	Raw materials are limited to fuel for fork lifts and oils used in maintenance of equipment.
The Operator should have procedures for the regular review of new developments in raw materials and for the implementation of any suitable ones with an improved environmental profile.	No specific raw materials or water are used in the process. Use of oils etc in maintenance will be reviewed at least once every four years in order to assess whether there are opportunities to minimise their use. Where improvements in raw material use can be achieved without excessive cost or reduction in the quality of the product these will be implemented.

Table 3:12: Compliance with Indicative BAT for Water Efficiency	
Indicative BAT requirements for water efficiency	**Compliance with Indicative BAT requirements**
The Operator should carry out a regular review of water use (water efficiency audit) at least every 4 years. If an audit has not been carried out in the 2 years prior to submission of the application and the details made known at the time of the application, then the first audit should take place within 2 years of the issue of the Permit.	Water is not used in the process.
The following general principles should be applied in sequence to reduce emissions to water: • Water-efficient techniques should be used at source where possible • Water should be recycled within the process from which it issues, by treating it first if necessary. Where this is not practicable, it should be recycled to another part of the process that has a lower water-quality requirement	Water is not used in the process.

Table 3:12: Compliance with Indicative BAT for Water Efficiency	
Indicative BAT requirements for water efficiency	**Compliance with Indicative BAT requirements**
• In particular, if uncontaminated roof and surface water cannot be used in the process, it should be kept separate from other discharge streams, at least until after the contaminated streams have been treated in an effluent treatment system and been subject to final monitoring.	

Table 3:13: Compliance with Indicative BAT for Waste Recovery or Disposal	
Indicative requirements for waste recovery or disposal	**Compliance with Indicative BAT requirements**
Describe how each waste stream is proposed to be recovered or disposed of. If you propose any disposal, explain why recovery is technically and economically impossible and describe the measures planned to avoid or reduce any impact on the environment. Waste production should be avoided wherever possible. Any waste that is produced should be recovered, unless it is technically or economically impractical to do so.	The output from the site will include: • separated battery types which will be sent off-site for recovery • four waste streams from the mechanical treatment of alkaline batteries which will be sent for recycling • small WEEE with batteries removed will be sent for recycling or recovery • small WEEE with inaccessible batteries will be sent for specialist recycling or recovery • Water from the sump will be sent for treatment at a STW.

Table 3:14: Compliance with Indicative BAT for Energy Requirements	
Indicative BAT requirements for basic energy requirements	**Compliance with Indicative BAT requirements**
The Operator should provide the energy consumption information in terms of delivered energy and also, in the case of electricity, converted to primary energy consumption.	Energy consumption information is provided in Table 5:1.
The Operator should provide associated environmental emissions.	Associated emissions are provided in Table 5:2.
Operating, maintenance and housekeeping measures should be in place in the following areas: operation of motors and drives, other maintenance relevant to activities.	A preventative maintenance programme will be in place with all site infrastructure and equipment inspected on a regular basis and serviced in accordance with the manufacturer's recommendations. Wastecare Limited staff will ensure that plant and equipment is working correctly, with repairs undertaken as required.

Table 3:14: Compliance with Indicative BAT for Energy Requirements	
Indicative BAT requirements for basic energy requirements	**Compliance with Indicative BAT requirements**
Energy management techniques should be in place.	Environmental issues will be a factor in purchasing of equipment and any infrastructure improvements. Where practical equipment offering better energy efficiency and lower emissions will be selected.

4 RAW MATERIAL USAGE

4.1 The process comprises simple waste treatment and few raw materials are utilised.

4.2 The raw materials used include fuel and oils used in plant maintenance. Nevertheless, raw material usage will be reviewed at least once every four years to identify whether there is any scope to minimise the quantities used or to replace products with more environmentally friendly alternatives.

4.3 Expected annual raw material use is outlined below, in Table 4.1.

Table 4:1: Raw Materials							
Raw Material	**Required Stage**	**Chemical Composition**	**Typical Usage per Annum**	**Quantity Stored on Site at One Time**	**Use of material**	**Hazardous Properties**	**Assessment of alternatives / Reduction**
Lubricating Oils and Greases	Plant and machinery Maintenance	Petroleum Hydrocarbon + Additives	200 litres	200 litres Stored in a suitable can / drum in a bund or drip tray.	Used for plant and equipment maintenance.	Prolonged or repeated contact with skin may cause mild irritation and possibly dermatitis. Mildly irritating to eyes. Waste oils may be carcinogenic.	Essential to proper operation of plant and machinery, no alternative available. Servicing of plant and machinery carried out in accordance with manufacturer's recommendations.
Red Diesel	Plant operation	$C_{12}H_{23}$	10,000 litres	1,000 litres Stored in a double skinned tank with crash protection and equipped with relevant signage. Stored in accordance with the oil storage regulations.	Fuel for site plant	Irritates the skin, eyes and respiratory tract. Possible carcinogen.	Current best option for fuel. Options to be kept under review.

5 ENERGY USE

5.1 Energy use will be minimised using simple management techniques including:

- switching plant off when it is not in use;
- maintaining all equipment in accordance with the manufacturer's recommendations and ensuring that adequate lubrication is used; and
- considering energy efficiency in the specification of lighting and heating.

5.2 The plant has state of the art drive systems and will be controlled by a programmable logic controller (PLC) to optimise processing. In additional LED lighting will be used. These will help minimise energy use on site.

5.3 Energy use will be metered and records will be kept regarding use of electricity and diesel. Energy usage will be reviewed at least once every four years and any opportunities for potential energy savings will be identified and implemented where practical.

5.4 In purchasing of equipment energy efficiency will be a consideration and energy efficient models will be selected where they deliver the same performance and are of reasonable cost.

5.5 Table 5:1 identifies the estimated total energy consumption per annum, i.e. electricity and diesel use.

Table 5:1: Energy Consumption

Energy Source	Unit	Units/year as delivered	At primary source Unit/year
Electricity	KWh	200	520
Diesel	Litres	10,000l	111,000 KWh
Total KWh	KWh		111,520 KWh

Factor of 2.6 applied for electricity from public supply in accordance with IPPC H2
Assumes 1 litre of diesel provides 11.1kW (http://www.rets-project.eu/UserFiles/File/pdf/respedia/A-Beginners-Guide-to-Energy-and-Power-EN.pdf).

Specific Energy Requirements

5.6 The specific energy consumption (SEC) for the site is defined as kWh per tonne of waste received. This will enable a like for like comparison between the data for one year and another, despite changes in the number of batteries processed. This will allow a benchmark to be set and improvements to be measured. The calculation of

the SEC, using data from Table 5.1, will be made over the duration of one year and will be calculated as follows:

$$SEC = \frac{\text{total primary energy consumption (kWh)}}{\text{total amount of waste received (tonnes)}}$$

5.7 The calculation of SEC will be completed on an annual basis and will be included within the annual site review. Table 5:2 shows a prediction of SEC for the first year of operations at the site. It is based on a maximum waste throughput of 25,000 tonnes per annum and a total energy consumption of 111,520 MWh per annum.

Table 5:2: Projected SEC for First Year of Operation

Year	Total Energy Consumption (kWh)	Total Waste Received (tonnes)	Projected SEC for year (kWh/ Tonne)
1	111,520	25,000	4.4608

5.8 This can be used to benchmark energy use at the site and demonstrate where savings have been made.

6 COMPLIANCE WITH BAT CONCLUSIONS

6.1 The recently issued new BAT conclusions and Wastecare's compliance with them are detailed below in Table 6:1.

Table 6:1: Assessment Against BAT Conclusions 2018/1147

BAT conclusion reference	Requirement	Compliant?
BAT 1.	Implement and adhere to an environmental management system.	Yes. EMS will be in place, accredited to ISO14001.
BAT 2a.	Set up and implement waste characterisation and pre-acceptance procedures.	Yes. See Operating Techniques.
BAT 2b.	Set up and implement waste acceptance procedures.	Yes. See Operating Techniques.
BAT 2c.	Set up and implement a waste tracking system and inventory.	Yes. See Operating Techniques.

Table 6:1: Assessment Against BAT Conclusions 2018/1147		
BAT conclusion reference	**Requirement**	**Compliant?**
BAT 2d.	Set up and implement an output quality management system.	Yes. See Operating Techniques.
BAT 2e.	Ensure waste segregation.	Yes. See Operating Techniques.
BAT 2f.	Ensure waste compatibility.	Yes. See Operating Techniques.
BAT 2g.	Sort incoming solid waste.	Yes. See Operating Techniques.
BAT 3.	Establish and maintain an inventory of waste water and waste gas streams.	N/A – no waste water or waste gas streams to be produced.
BAT 4a.	Optimise storage location.	Yes. See Operating Techniques.
BAT4b.	Adequate storage capacity.	Yes. See Operating Techniques.
BAT 4c.	Safe storage.	Yes. See Operating Techniques.
BAT4d.	Separate storage area for handling of packaged hazardous waste.	Yes. See Operating Techniques.
BAT 5.	Implement handling and transfer procedures.	Yes. See Operating Techniques.
BAT 6.	Monitor key process parameters for relevant emissions to water.	No emissions to water
BAT 7.	Monitor emissions to water in accordance with BAT 7. Table.	N/A – No emissions to water
Bat 8.	Monitor channelled emissions to air for H_2S, NH_3 and odour.	N/A - No point source emissions to air
BAT 9.	Monitor diffuse emissions of organic compounds to air from the regeneration of spent solvents.	N/A – proposed activities do not include regeneration of spent solvents, the decontamination of equipment containing POPs with solvents, and the physico-chemical treatment of solvents.
BAT 10.	Monitor odour where an odour nuisance at sensitive receptors is expected.	N/A – only applies to cases where an odour nuisance at sensitive receptors is expected and/or has been substantiated.
BAT 11.	Monitor consumption of water, energy and raw materials.	Yes. See sections 4 and 5 above.
BAT 12.	Implement and review an Odour Management Plan.	N/A – only applies to cases where an odour nuisance at sensitive receptors is expected and/or has been substantiated.
BAT 13.	Reduce odour by a. Minimising residence times b. Using chemical treatment c. Optimising aerobic treatment.	N/A – an odour control system is not required

Table 6:1: Assessment Against BAT Conclusions 2018/1147		
BAT conclusion reference	**Requirement**	**Compliant?**
BAT 14.	Use appropriate techniques to reduce diffuse emissions of dust, organic compounds and odour.	Yes. See Amenity and Accident Risk Assessment.
BAT 15.	Flare used only for safety reasons or for non-routine operation.	N/A
BAT 16.	Minimise emissions from flaring using correct design of flare and monitoring and recording as part of flare management.	N/A
BAT 17.	Implement and review a noise and vibration management plan.	N/A – only applies where noise or vibration nuisance at sensitive receptors is expected and/or has been substantiated.
BAT 18.	Use appropriate measures to reduce noise.	Yes. See Amenity and Accident Risk Assessment.
BAT 19.	Use appropriate measures to reduce emissions of waste water including segregation of water streams and adequate drainage.	N/A – no requirement or demand for water in the process.
BAT 20.	Use appropriate measures to treat waste water.	N/A – no water used in the process.
BAT 21.	Limit environmental consequences of accidents by including protection measures managing accidental emissions incident/accident registration and assessment.	Yes. See Amenity and Accident Risk Assessment.
BAT 22.	Substitute raw materials with waste where appropriate.	N/A – no substitution possible.
BAT 23.	Implement and energy efficiency plan and energy balance record.	EMS includes energy efficiency review and measures.
BAT 24.	Maximise reuse of packaging.	Yes. Packaging (drums, containers, IBCs, pallets, etc.) will be reused for containing waste, when it is in good condition and sufficiently clean.
BAT 25	In order to reduce emissions to air of dust, and of particulate-bound metals, PCDD/F and dioxin-like PCBs, BAT is to apply BAT 14d and to use one or a combination of the techniques specified.	Yes. See Amenity and Accident Risk Assessment.
BAT 26	In order to improve the overall environmental performance, and to prevent emissions due to	N/A – applies only to the mechanical treatment in shredders of metal waste

Table 6:1: Assessment Against BAT Conclusions 2018/1147		
BAT conclusion reference	**Requirement**	**Compliant?**
	accidents and incidents, BAT is to use BAT 14g and all of the techniques specified.	
BAT 27	Prevention of deflagrations and to reduce emissions when deflagrations occur.	N/A – applies only to the mechanical treatment in shredders of metal waste.
BAT 28	In order to use energy efficiently, keep the shredder feed stable.	N/A – applies only to the mechanical treatment in shredders of metal waste.
BAT 29	In order to prevent or, where that is not practicable, to reduce emissions of organic compounds to air, BAT is to apply BAT 14d, BAT 14h and to use technique a. and one or both of the techniques specified.	N/A – no mechanical treatment of WEEE proposed.
BAT 30	In order to prevent emissions due to explosions when treating WEEE containing VFCs and/or VHCs, BAT is to use either of the techniques specified.	N/A – no mechanical treatment of WEEE proposed.
BAT 31.	In order to reduce emissions to air of organic compounds, BAT is to apply BAT 14d and to use one or a combination of the techniques specified.	N/A - Applies to pre-treatment of waste for incineration.
BAT 32.	In order to reduce mercury emissions to air, BAT is to collect mercury emissions at source, to send them to abatement and to carry out adequate monitoring.	N/A – no mechanical treatment of WEEE containing mercury proposed.
BAT 33.	Reduce odour emissions by controlling waste inputs.	N/A – only applies to the biological treatment of waste
BAT 34.	Use abatement as appropriate to control dust, VOCs, H_2S, NH_3 and odorous compounds.	N/A – only applies to the biological treatment of waste
BAT 35.	Segregate water streams Recirculate water Minimise generation of leachate.	N/A – only applies to the biological treatment of waste
BAT 36	In order to reduce emissions to air and to improve the overall environmental performance, BAT is to monitor and/or control the key waste and process parameters.	N/A – only applies to aerobic treatment of waste.
BAT 37	In order to reduce diffuse emissions to air of dust, odour and bioaerosols from open-air	N/A – only applies to aerobic treatment of waste.

Table 6:1: Assessment Against BAT Conclusions 2018/1147		
BAT conclusion reference	**Requirement**	**Compliant?**
	treatment steps, BAT is to use one or both of the techniques specified.	
BAT 38.	Monitor key process parameters such as pH and alkalinity, digester temperature, hydraulic and organic loading rates, concentration of volatile fatty acids and ammonia within the digester and digestate, biogas pressure, quantity and composition, liquid and foam levels in the digester.	N/A – only applies to anaerobic treatment of waste
BAT 39.	Segregate gas streams Recirculate waste gas.	N/A – only applies to mechanical biological treatment of waste
BAT 40	In order to improve the overall environmental performance, BAT is to monitor the waste input as part of the waste pre-acceptance and acceptance procedures.	Yes. See Amenity and Accident Risk Assessment.
BAT 41	In order to reduce emissions of dust, organic compounds and NH_3 to air, BAT is to apply BAT 14d and to use one or a combination of the techniques specified.	Yes. See Amenity and Accident Risk Assessment.
BAT 42	In order to improve the overall environmental performance, BAT is to monitor the waste input as part of the waste pre-acceptance and acceptance procedures	N/A – only applies to the re-refining of waste oil
BAT 43	In order to reduce the quantity of waste sent for disposal, BAT is to use one or both of the techniques specified.	N/A – only applies to the re-refining of waste oil
BAT 44	In order to reduce emissions of organic compounds to air, BAT is to apply BAT 14d and to use one or a combination of the techniques specified.	N/A – only applies to the re-refining of waste oil
BAT 45	In order to reduce emissions of organic compounds to air, BAT is to apply BAT 14d and to use one or a combination of the techniques specified	N/A – only applies to pre-treatment of waste for incineration.
BAT 46	In order to improve the overall environmental performance of the	N/A – only applies to the regeneration of spent solvents.

Table 6:1: Assessment Against BAT Conclusions 2018/1147		
BAT conclusion reference	**Requirement**	**Compliant?**
	regeneration of spent solvents, BAT is to use one or both of the techniques specified.	
BAT 47	In order to reduce emissions of organic compounds to air, BAT is to apply BAT 14d and to use a combination of the techniques specified.	N/A – only applies to the regeneration of spent solvents.
BAT 48	In order to improve the overall environmental performance of the thermal treatment of spent activated carbon, waste catalysts and excavated contaminated soil, BAT is to use all of the techniques specified.	N/A – only applies to the thermal treatment of spent activated carbon, waste catalysts and excavated contaminated soil
BAT 49	In order to reduce emissions of HCl, HF, dust and organic compounds to air, BAT is to apply BAT 14d and to use one or a combination of the techniques specified.	N/A – only applies to the thermal treatment of spent activated carbon, waste catalysts and excavated contaminated soil
BAT 50	In order to reduce emissions of dust and organic compounds to air from the storage, handling, and washing steps, BAT is to apply BAT 14d and to use one or a combination of the techniques specified.	N/A – only applies to the water washing of excavated contaminated soil
BAT 51	In order to improve the overall environmental performance and to reduce channelled emissions of PCBs and organic compounds to air, BAT is to use all of the techniques specified.	N/A – only applies to the decontamination of equipment containing PCBs
BAT 52	In order to improve the overall environmental performance, BAT is to monitor the waste input as part of the waste pre-acceptance and acceptance procedures.	N/A – only applies to the treatment of water-based liquid waste
BAT 53	In order to reduce emissions of HCl, NH3 and organic compounds to air, BAT is to apply BAT 14d and to use one or a combination of the techniques specified.	N/A – only applies to the treatment of water-based liquid waste

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AMENITY AND ACCIDENT RISK ASSESSMENT

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ENERGY AND CLIMATE CHANGE
ENVIRONMENT AND SUSTAINABILITY
INFRASTRUCTURE AND UTILITIES
LAND AND PROPERTY
MINING AND MINERAL PROCESSING
MINERAL ESTATES
WASTE RESOURCE MANAGEMENT

WASTECARE LIMITED

BATTERY TREATMENT FACILITY, HALIFAX

AMENITY AND ACCIDENT RISK ASSESSMENT

DECEMBER 2018

wardell armstrong

CONTENTS

TABLES

DRAWINGS

Drawing Number	Drawing Title	Scale
ST16653-002	Permit Boundary	1:2,500

1 INTRODUCTION

1.1 Wastecare Limited are applying for a bespoke installation permit at Units 1-6 North Dean Business Park, Stainland Road, Halifax, HX4 8LR. The site location and proposed permit boundary of the facility are shown on drawings ST16653-001 and ST16653-002 respectively.

1.2 The facility will sort batteries into their different chemistries. Alkaline batteries and batteries with zinc or manganese chemistry (referred to as alkaline batteries in this application) will then be deconstructed in a hammermill to facilitate the recovery of four fractions, specifically ferrous metal, non-ferrous metal, mixed paper and plastic and black mass. The other types of batteries separated into their different types will be sent for offsite recycling and recovery. This includes batteries containing fluids, e.g. lead acid batteries, will not be treated on site but will be bulked up for treatment elsewhere.

1.3 The facility will accept up to 25,000 tonnes per annum of hazardous and non-hazardous batteries. A full list of the battery types that may be accepted on site is given in the Operating Techniques.

1.4 The storage and treatment (sorting) of mixed batteries (hazardous waste) of more than 10 tonnes per day means this activity falls under Schedule I Part II of the Environmental Permitting (England and Wales) Regulations 2016, making it an 'installation':

Section 5.3 Part A(1) (a)
Disposal or recovery of hazardous waste with a capacity exceeding 10 tonnes per day involving one or more of the following activities—
(ii) physico-chemical treatment

Section 5.6 Part A(1) (a)
Temporary storage of hazardous waste with a total capacity exceeding 50 tonnes pending any of the activities listed in Sections 5.1, 5.2, 5.3

1.5 The permit application also includes a new waste operation activity for the mechanical

treatment of non-hazardous alkaline batteries.

1.6 Treatment of batteries will be carried out in accordance with Best Available Techniques. Furthermore, small items of waste electrical and electronic equipment (WEEE) will also be accepted at the site. These will be treated to remove the batteries and sort them for recycling. Treatment of WEEE is carried out using Best Available Treatment, Recovery and Recycling Techniques (BATRRT).

1.7 The treatment and storage of waste batteries will also comply with Part A of Annex III to the Batteries Directive, specifically: treatment and storage areas will have impermeable surfaces with weatherproof covering in appropriate areas or suitable containers. The recycling process is designed to allow battery recycling through the site to meet the efficiency required by Annex III, Part B of the Batteries Directive, that is recycling at least 65% by average weight of lead-acid batteries, 75% by average weight of nickel cadmium batteries and 50% by average weight of other batteries.

1.8 Wastecare Limited currently operate an authorised WEEE treatment facility operating under a Standard Rules permit (SR2008 No.23) reference EPR/MP3899VT. This will be retained for the pilot plant in Unit 4.

1.9 The site is already operated in accordance with an Environmental Management System (EMS), which meets the requirements of the Environment Agency's Guidance (https://www.gov.uk/guidance/develop-a-management-system-environmental-permits) and is accredited to ISO14001.

1.10 Existing waste acceptance procedures will be updated at the site to continue to ensure that only permitted wastes are accepted at the site. Permitted wastes and waste acceptance procedures are detailed in the Operating Techniques.

1.11 All waste storage and treatment activities will be undertaken in accordance with the EMS to ensure that the environment is protected during all stages of waste battery storage and handling.

1.12 Environmental monitoring and record keeping will be undertaken and completed in

accordance with the EMS and the conditions included in the environmental permit when issued.

2 SENSITIVE RECEPTORS

2.1 The facility is located at NGR (National Grid Reference) SE 09469 22056, approximately 2.9km south of the centre of Halifax and 1.8km north west of the centre of Elland.

2.2 The site is located within the North Dean Business Park which is an industrial estate. The site is bound to the north by MJB Excavations and Plant Hire, to the south by a railway line (Calder Valley Line), to the west by an oil supply business and to the east by the River Calder, beyond which is the Stainland Road.

2.3 The nearest residential receptors are 300m away to the north east.

2.4 There are two surface water bodies nearby. The closest is the River Calder which runs to the east and north of the site. At its closest it is approximately 26m from the permit boundary. The River Calder connects to the Calder and Hebble Canal, which also runs to the east and north of the site. At its closest it is approximately 130m from the permit boundary.

3 RISK ASSESSMENT

3.1 The potential environmental risks associated with the site have been identified and measures are in place to minimise these risks.

3.2 All identified hazards that could cause harm will be subject to strict preventative or control measures managed in accordance with the site's Environmental Management System (EMS). The EMS will include procedures for the inspection, servicing and maintenance of site plant and infrastructure so that all pollution control measures remain fit for purpose.

3.3 As received the batteries do not emit any significant odour. Battery treatment will take place within an enclosed system preventing emissions to atmosphere.

3.4 Staff will be trained to understand the potential environmental risks associated with the site and their role in managing those risks in accordance with the EMS. An induction will also be provided for contractors, so that they are aware of any environmental requirements.

3.5 Table 3:1 below identifies the potential amenity risks that may arise from operations at the battery treatment facility and considers the possible pathways and receptors that may be impacted. It shows how these risks are minimised; by preventing the hazard at source or by providing measures to break the pathway and prevent pollution migrating towards receptors.

Table 3:1: Risk Assessment						
Hazard	**Receptor**	**Pathway**	**Consequence**	**Probability of exposure without measures**	**Mitigation Measures**	**Overall risk**
ODOUR						
Odour from receipt of wastes	Local residents and local businesses	Airborne	Annoyance	Low	Permitted wastes present a very low risk of odour. Incoming wastes will be unloaded and stored in a well ventilated area. The reception area will be inspected daily, and any noticeable odour will be investigated and, where appropriate, remedial action will be put in place.	Very Low
Odour from waste treatment	Local residents and local businesses	Airborne	Annoyance	Medium	Wastes will be mechanically treated in a dutch barn within an enclosed system. The vibro-screen is covered. Any electrolyte will be removed at this point, combined in the black mass. The black mass will be removed by an enclosed screw conveyor and loaded directly into bags.	Low
Odour from storage of waste pending removal from site	Local residents and local businesses	Airborne	Annoyance	Low	Permitted wastes present a very low risk of odour. The waste storage areas will be inspected daily, and any noticeable odour will be investigated and, where appropriate, remedial action will be put in place.	Very Low
LITTER						
Fugitive emissions from waste	Local residents, local businesses	Wind blown	Annoyance, potential hazard to wildlife	Low	Permitted wastes are very unlikely to include a light fraction that could be transported by wind. The treatment process is enclosed and is located within a three-sided building, which will provide shelter from the wind, minimising any opportunity for paper or plastic to become windblown. As some light items, such as paper, can be present as an accidental admixture to the battery loads, the site will be inspected daily, and any loose material noted will be collected and placed in a bin or returned to the process.	Very Low

PESTS						
Presence of pests and vermin	Local residents, local businesses	Overground	Potential harm to human health resulting from spread of disease, annoyance	Low	Permitted wastes present a very low risk of attracting pests and vermin. Waste storage areas will be kept tidy. The site will be inspected daily by site staff and any signs of infestation will be noted. A pest control contractor will make monthly visits as a matter of routine. Should pests be observed at significant levels, a pest control contactor will be required to attend the site as soon as possible.	Very Low
NOISE						
Noise from plant or machinery	Local residents are 300m from the site	Airborne	Disturbance for local residents	Medium	Initial battery sorting activities will be undertaken within an enclosed building. The treatment equipment for non-hazardous waste is an enclosed system, which will provide a degree of noise attenuation. All plant and equipment will be maintained in accordance with the manufacturer's recommendations. Noise levels will be taken into consideration during the selection of site equipment, with quieter models being utilised where this is practical and economically viable.	Low
Noise from vehicles	Local residents are 300m from the site	Airborne	Disturbance for local residents	Low	Engines will be turned off when not in use. Deliveries will be timed to avoid queuing wherever possible. On site vehicles will be fitted with broadband reversing alarms to reduce noise levels. Traffic movements are small scale compared to nearby businesses.	Very Low
DUST						
Dusty waste or dust around site	Local residents and businesses	Airborne	Annoyance for local residents	Low	Permitted wastes present a very low risk of generating dust as delivered. The site is provided with concrete surfacing. Site will be swept by mechanical sweeper if the need is identified during daily site inspections. Black mass is removed within an enclosed system and will be collected via an	Very Low

					enclosed screw conveyor directly into bags, limiting the opportunity for emissions of dust.	
MUD						
Mud or debris on local roads	Road users	Tracked out of site by vehicles	Road traffic accidents	Very low	Permitted wastes present a very low risk of generating mud. Site will be swept by mechanical sweeper if need identified during daily site inspection. The site is provided with concrete surfacing so is unlikely to generate mud.	Very low
LEAKS AND SPILLS						
Fluid Leak or spillage	Nearby Surface water bodies, Groundwater	Via drains or infiltration through soils or direct contact	Pollution of surface water and impact on aquatic ecosystem; pollution of groundwater	Medium	The site has impermeable surfacing with sealed drainage. Waste containers and site infrastructure will be inspected weekly and maintained as required. Fuel storage will be provided with an integral bund.	Very Low
FIRE						
Smoke	Local residents, local businesses	Airborne	Odour, respiratory irritation.	Low	Full details are provided in the Fire Prevention Plan which has been prepared for the site, in accordance with Environment Agency Guidance.	Very low
Firewater run-off	River Calder, Groundwater	Via site drains or infiltration through soil	Contamination of surface water	Low	Full details are provided in the Fire Prevention Plan which has been prepared for the site, in accordance with Environment Agency Guidance.	Low

4 CONSERVATION RISK ASSESSMENT

General

4.1 This section outlines the potentially sensitive ecological receptors in proximity to the facility. Each of the potential risks to these receptors will be considered and where needed the Operator will employ management techniques, infrastructure or other mitigation to reduce the risk.

4.2 A search on MAGIC.gov.uk confirms that are no SSSIs within 2.5km of the facility. There are no RAMSAR or other European designated sites within 5km of the facility. MAGIC identifies that there are a number of areas of deciduous woodland in the area, the closest of which are immediately adjacent to the site, around the site boundary. The site lies within a designated are of green belt and the area for Community Forests for England.

4.3 The Long Wood Local Nature Reserve lies approximately 1.2km to the northwest of the facility, comprising mainly deciduous woodland.

4.4 MAGIC also identified that there may be a number of priority bird species in the area, including curlew and lapwing. The site lies within a Farm Wildlife Package Area.

Table 4:1: Potentially Sensitive Habitats

Receptor	Approximate Distance	Direction
River Calder	26m	North and east
Calder Hebble Navigation	130m	North and East
Priority Woodland habitats	Within 500m	Various points around the site
Scarr and Long Woods (National Nature Reserve)	1.2km	North west

Assessment of Risk

4.5 The Environment Agency guidance identifies the following potential impacts which may be caused by waste activities:

- Eutrophication/nutrient enrichment of water courses;
- toxic contamination;
- habitat loss;
- smothering;
- disturbance; and
- physical damage.

4.6 Eutrophication may occur when nutrients are washed into nearby water bodies causing a rapid increase in the number of bacteria and other simple organisms. This in turn leads to rapid depletion of oxygen levels, which can adversely impact fish and other flora/fauna present. The control measures in place at the site and nature of the tasks undertaken mean there is a very low risk of a eutrophication event of the River Calder or to the Calder Hebble Navigation.

4.7 There will be no discharge to water from the site and the operations are all carried out on an impermeable concrete surface with sealed drainage. Site drainage is collected in a sealed sump. These measures in combination with good materials reception procedures, regular site inspections and clean-up operations mean we consider that there is a low risk to any underlying strata and groundwater beneath the site.

4.8 There will be no habitat loss as a result of the activities carried out at the facility. The areas of woodland and River Calder around the site will be unaffected by operations at the existing installation, which will not increase its footprint. Other protected habitats are some distance from the site and will not be impacted.

4.9 Smothering can occur where there are large scale emissions of dust, which can have an adverse impact on local vegetation. As part of the environmental controls to be in place at the site dust management procedures have been developed. These will include:

- vehicles delivering materials to the site are to be sheeted or enclosed;
- The materials delivered to site are highly unlikely to generate significant quantities of dust due to their solid state;
- a speed limit will be in place to minimise disturbance of dust;
- the site has a concrete surface and will be swept as necessary to minimise dust and debris that may be present.

4.10 These control measures will ensure that emissions of dust are minimised and it is not considered that dust will cause any significant impact on protected habitats or species.

4.11 It is not considered that the facility will cause undue disturbance to the local bird population as the site is in an industrial area.

4.12 To demonstrate that this is the case regular noise monitoring will be carried out and the following control measures will be in place to minimise emissions of noise:

- site operations take place within an enclosed building or dutch barn (three-sided building) and will be screened by the walls;
- the treatment process is enclosed;
- plant will be properly maintained in accordance with the manufacturer's recommendations;
- noise will be a consideration in purchasing equipment and quieter models will be used where practicable;
- idling and reversing will be minimised by good traffic management on site;
- reversing alarms will be selected with due regard to minimising noise nuisance;
- all site plant must comply with the on-site speed limit; and
- drop heights will be minimised.

4.13 The operations and activities at the site will not cause any physical damage to protected species or habitats.

4.14 Because only solid-state batteries will be accepted on site, no litter will be generated and therefore there is no risk of harm to local wildlife from items of litter.

5 CONCLUSION

5.1 The design and operational measures at the facility will ensure that activities do not present an unacceptable risk to the environment.

5.2 In practice, all identified hazards that could cause harm, are subject to preventative measures as a result of the site infrastructure that will be provided and the management systems in place.

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FIRE PREVENTION PLAN

FIRE PREVENTION PLAN - HALIFAX (FPPHA)

CONTENTS

APPENDICES

DRAWINGS	TITLE	SCALE
ST16653-006	Site Layout	1:500
ST16653-007	Environmental Receptor Plan	1:10000

1 INTRODUCTION

1.1 This Fire Prevention Plan has been prepared with reference to the Environment Agency's FPP guidance dated 29 July 2016 (https://www.gov.uk/government/publications/fire-prevention-plans-environmental-permits/fire-prevention-plans-environmental-permits)

1.2 The plan has been developed for Waste Care Halifax, which is located at the following address:
Units 1-6
North Dean Business Park
Stainland Road
Halifax
HX4 8LR

1.3 It is the objective of this plan to minimise the risk of a fire starting and to ensure that, in the event of a fire occurring, it is identified as early as possible and effective measure are implemented to extinguish it, whilst minimising the environmental impact. The Fire Prevention Plan has therefore been prepared in order to minimise the potential for a fire event at the site and to maximise the potential to extinguish any fire within a maximum of 4 hours.

1.4 The Fire prevention Plan covers staff training and awareness, Combustible Wastes that may be stored on site, how the common causes of fire are managed, how waste is managed to minimise self-heating and prevent the spread of fire, provision of a quarantine area, fire detection and suppression, contingency plans for incoming waste, water supply and management of fire water and cleaning up after a fire.

2 MANAGEMENT OF THE SITE AND STAFF AWARENESS

2.1 An Environmental Management System (EMS) has been prepared, which is specific to the site, and both electronic and hard copies are stored in the Site Office. All staff will receive training regarding the EMS procedures, so that the site is operated correctly and risks to the environment are minimised. Such training will include awareness of the Fire Prevention Plan and how to respond in an emergency situation. Contractors will also be made aware of the environmental permit, EMS and this Fire Prevention Plan in so far as it relates to their work.

2.2 All new employees will receive company induction training. This training includes Health and Safety, Quality and Environmental management and covers key areas such as fire safety, first aid, incident and emergency procedures and workplace hazards. A signature will be required from the employee to confirm that they have understood the contents. A copy of this form will be kept on their personnel file.

2.3 Once the company induction is complete, each employee will complete training on five mandatory health and safety topics, one of these being fire action training and another being fire

extinguisher training. Again, once the training is complete, the training topic is signed and a copy is held in the employee training file.

2.4 A training matrix is held electronically showing the training dates for each employee on site and will be used to ensure that each employee completes refresher training in fire prevention and emergency response at least annually.

2.5 The site manager will be responsible for maintaining and reviewing this Fire Management Plan at least once every four years or following an incident.

3 RELEVANT COMBUSTIBLE MATERIALS

3.1 The list of potentially combustible materials that may be present on site is provided below in Table 3.1. This Fire Prevention Plan only applies to the materials confirmed as being relevant to site activities. Further information on waste types, storage capacities is provided in Section 4.

Table 3.1: Combustible Materials

Materials listed in EA FPP Guidance	Materials Stored on Site	Relevant to site activities?
Paper or Cardboard	Paper/card packaging and separators from batteries	Yes
Plastics	Plastic packaging and plastic battery components	Yes
Rags and textiles	Not accepted	No
Scrap Metals	Steel, zinc, manganese and potassium and similar materials as metals or compounds arising from battery cases, anodes, cathodes and electrolytes	Yes
End of life vehicles	Not accepted	No
Refuse derived fuel	Not accepted	No
Compost and plant material	Not accepted	No
Biomass	Not accepted	No
Mixed waste containing combustible wastes	Not accepted	No
Rubber (including tyres)	Rubber from battery components	Yes
Wood (including logs, planks, sawdust, wood chip, pallets and wooden containers	Not accepted	No
WEEE	Small WEEE may be accepted alongside the batteries	Yes
Fragmentiser Waste	Not accepted	No
Not listed in EA FPP guidance	Mixed batteries	No

Table 3.1: Combustible Materials		
Materials listed in EA FPP Guidance	**Materials Stored on Site**	**Relevant to site activities?**
Not listed in EA FPP guidance	Black mass from batteries (carbon black/graphite)	No

4 SITE LOCATION AND LAYOUT

4.1 The site is approximately 2 acres in size and comprises waste treatment and storage buildings and external waste storage areas. The site will accept waste mixed loads of batteries which will be sorted into type, with only portable alkaline batteries being subject to further physical treatment to recover the following individual material streams:

- Mixed paper and plastics;
- Ferrous and non-ferrous metal; and
- Carbon Black (known as Black Mass).

4.2 The Site Plans attached to this Fire Prevention Plan provide the following information:

ST16653-006

Drawing ST16653-006 shows the following:

- location of buildings and other infrastructure,
- detailed layout of buildings,
- drainage systems and surface water drains, and their direction of flow and outfall points, and
- the location of firewater containment systems.
- main access routes for fire engines and any alternative access,
- firefighting hydrants and water supplies, and
- areas of natural and unmade ground.

ST16653-007

Drawing ST16653-007 shows the following:

- residential areas,
- workplaces,
- protected habitats,
- rivers within 1km of the site, and
- other receptors that are likely to be affected by a fire at this facility.

4.3 The site is located within an area of both commercial and residential development. Table 4.1 lists the potential receptors within 1km of the site:

Table 4.1: Potentially Sensitive Receptors		
Receptor	**Distance from Site**	**Direction**
Residential		
Housing	220m	North East
Lindwell Town (shops and houses)	490m	South
Banktop Farm	490m	South
Exley Hall Farm	545m	East
Upper Exley Village	545m	East
Housing	595m	North
Blackhold Avenue residential area	685m	North East
Upper Scholes Farm	790m	West
Schools		
Park Lane High School	685m	East-north east
All Saints Junior & Infants School	735m	North
Westvale Primary School	750m	South
Copley Primary School	945m	North west
Public Open Spaces		
Playing field	300m	East
Sports ground	385m	South east
Elland Cemetery	790m	South east
Recreation ground	980m	West
Infrastructure		
Railway line	<50m	South and west
Sewage Treatment works	<150m	North west
A6026/A629 major junction	175m	North east
B6112 road	175m	East
A629 road	175m	East
Mast	210m	West
A6026 Road	290m	North
Railway line	455m	North
Environmental		
River Calder	<100m	North and east
Priority Woodland habitats	Within 500m	Various points around the site
Commercial/retail		
Newbank Garden Centre	500m	South east

5 MANAGING THE COMMON CAUSES OF FIRE

5.1 Fires can be caused in a number of ways and simple housekeeping procedures and common-sense actions can help to manage some these risks. Systems in place to help minimise the risk of a fire occurring are described in Table 5.1.

Table 5.1 : Managing Common Causes of Fire	
Potential Cause of Fire	**Managed by**
Arson	Site security will include security fencing and lockable gates. Only authorised personnel are allowed on site, visitors are allowed on site only by prior arrangement and must report to reception and be accompanied by a company employee whilst on site. The majority of waste will be stored inside secure buildings with any waste stored externally placed in covered bins or bays. All waste storage will be 6 metres or more from buildings, the site perimeter and any flammable materials. Waste cannot be accessed from outside. The site has 24-hour CCTV and intruder / fire alarms in operation; these are monitored by an external company. In the event of an emergency / alarm activation out of operational hours, the CCTV monitoring company will notify the key holders and emergency services. The site operates a site-specific Incident and Emergency procedure which forms part of the EMS. All site personnel are trained on the incident and emergency procedures.
Faulty equipment (including heaters) or exposed wires	The site operates a preventative maintenance programme for all plant and equipment on site. Statutory requirements for inspections and maintenance will be followed. Staff will also be trained to alert management to any issues noted on a day to day basis. A weekly site walk around will be completed, including checking all switches, distribution boards and sockets for damage and checking for exposed cables. Faulty equipment will be taken out of use until repairs can be completed. Waste will not be stockpiled close to operational plant. Specialist external contractors will be used, and all servicing and repairs will be completed by competent staff. Heaters will be subject to safety checks before use and will be included in the inspection and maintenance schedule. A distance of 6m will be maintained between heaters waste stockpiles.
Discarded smoking materials	The site has been designated a no smoking site. Smoking will only be permitted outside of the site and anyone wishing to smoke must exit the main gate to do so.

Table 5.1 : Managing Common Causes of Fire	
Potential Cause of Fire	**Managed by**
Hot works	All welding and cutting must be authorised by the Site manager via the site permit to work system. Hot works are only completed in a safe / shielded area. If it is not possible to move the equipment / machinery to a safe area, then all plant and equipment in that area is shut down and isolated. Any wastes in that area will be removed to avoid any possibility of hot works leading to a fire. Wastes may be returned only once the work has been completed and when a check has been made to ensure that there are no remaining sources of heat present that could cause combustion. Hot works will be carried out at least 6m away from waste.
Hot exhausts	A visual inspection will be made of hot exhausts and other surfaces that may become hot once an hour whilst the machinery is in use. Plant and equipment will be cleaned regularly preventing dust and debris build up on hot surfaces
Leaks and spills of fuel	Only red diesel is stored on site in a $1m^3$ IVC.
Build-up of loose combustible materials	Combustible materials will be stored in appropriate containers and will be collected for recycling on a regular basis. At the end of each day a check will be made and any loose litter will be collected and returned to the appropriate storage bin or bay.
Reactions between wastes/deposited hot loads	Only batteries and small WEEE are received on site so the potential for reactions between incompatible wastes are negligible. There is potential for a fire due to short circuiting of batteries. Batteries will therefore be stored remote from combustible wastes such as plastic and card. A quarantine area will be provided to isolate effected batteries where necessary. Incompatible batteries will be stored in different parts of the site.

6 MANAGING WASTE STORAGE

6.1 Table 6.1 sets out the preventative measures that will be employed at the site to minimise the potential for a fire event to occur. These measures apply year-round. Due to the nature of the incoming wastes there are no seasonal variations in waste types or waste quantities that need to be taken into account.

6.2 Full details regarding waste pre-acceptance, acceptance, storage and treatment are provided in the Operating Techniques for the site. An extract from the Operating Techniques providing these details is reproduced as Appendix 1 in order to provide a standalone Fire Prevention Plan for the site.

Table 6.1: Management of Waste Storage

Issue	Preventative Action
Pile sizes / volumes and dimensions	Following treatment and separation, wastes will be stored in 1m^3 bags or IBC's. These are tidily and carefully stacked into appropriate stockpiles to minimise the chance of a fire starting or spreading. Generally, bags or containers are in rows no more than 1 container high and with a gap of 2m between the rows to allow access for inspection or to move containers.
Storage Duration	Daily deliveries and dispatch of waste will occur with most wastes being sorted, processed and removed from site within 48 hours. No waste will be stored for longer than 6 months. This is because wastes in small quantities will be stored until there is sufficient payload to justify collection. A stock control system will be in place to ensure that wastes are not stored for an excessive period. Bays will be cleared on a regular basis ensuring first in first out management of stored wastes.
Monitoring	Visual checks will made of all waste storage areas at least once a day. WEEE wastes stored on site will be temperature checked using a non-contact digital infrared thermometer at the end of each day, the temperature will be recorded and all records are retained on site. Any storage area showing a temperature of 50°C or above or a sudden increase in temperature will be investigated by the Site Manager immediately, the storage area will be emptied to ascertain the cause of the increase in temperature. The senior management team will also be informed. Outside of operational hours the site has 24 hour CCTV monitoring, the monitoring company will inform the key holders and emergency services if they see any changes in the waste storage areas.

Table 6.1: Management of Waste Storage	
Issue	**Preventative Action**
Actions to limit self-heating	There are no waste stockpiles on site so turning of piles is unnecessary. There are no baled wastes on site. Wastes are stored in IBCs or bags of similar size so they can be easily moved if necessary. The quick turn round times limit the opportunity for self-heating.
Infrastructure and site inspections	The EMS contains a weekly site inspection checklist which requires checks on site security, litter, evidence of site operations breaching the site boundary, integrity checks of storage areas and drainage checks. Brief checks will be carried out daily. If there are any issues, these are recorded on the inspection sheet and then rectified immediately. Site Management will authorise any major actions i.e. repairs to concrete storage areas. The EMS also contains a monthly more comprehensive site inspection, the inspection form is completed and kept on site, detailing any areas of concern and / or defects along with any actions required and completed to rectify the issue. Bi-annual site audits are completed, these are in-depth internal audits which include Health & Safety questions, including fire action and fire equipment checks, and Environmental and Quality questions, which check that records are kept on site and the volumes and types of wastes currently stored are correctly recorded. Any non-compliance found at the time of the internal audit will be reported to the Site Management and a timetable of corrective actions will be generated. Follow-up checks from the Compliance Team will ensure that all corrective actions are completed.
Heat and Spark prevention	There is no requirement to fit plant and equipment with heat and spark prevention and due to the nature of the materials stored there is no need for zoned areas within the warehouse. Only fork lift trucks are used to move materials within the warehouse. Delivery vehicles do not enter the building. Fixed plant will be wired into the mains and is earthed correctly. The operative will complete daily checks which include checking for damaged wiring before using any machine.

Table 6.1: Management of Waste Storage	
Issue	**Preventative Action**
Gas bottles and other flammable items including fuels, oils etc.	Any gas bottles used on site are stored in isolation from the buildings, in a purpose built locked cage bolted to the ground. Gas bottles are for on-site use only and are not brought onto site as waste, they are maintained and serviced as part of a specialist contract with the supplier. Where it cannot be returned direct to the waste producer any non-conforming waste that could be flammable will be quarantined and segregated from other wastes and the buildings by a separation gap of at least 10 metres. Site Operatives will check all waste storage on a daily basis. An inventory of flammable materials will be kept on site so that site staff, management and the emergency services are able to identify these if needed.
Fire Watch	The EMS details an End of Day / site lock down procedure, the procedure explains what must be checked at the end of each day and how the site should be locked down safely to ensure that nothing is left switched on unnecessarily and that the site is safe overnight and at weekends.

7 STORAGE OF COMBUSTIBLE AND FLAMMABLE MATERIALS ON SITE

7.1 All wastes will be stored at least 6m from the site perimeter and from any other flammable materials. Wastes stored externally will be at least 6m from any of the buildings. Table 7.1 details stockpile sizes and storage times for the different types of waste.

Table 7.1: Storage of Combustible Materials				
Combustible material	**Form**	**Quantity Stored**	**Storage capacity (comparison with EA limit)**	**Maximum storage time**
Separated combustible batteries – lithium	Drums/boxes	250t	100m^3 (450m^3)	6 months
Cardboard	Loose packaging	500kg	50m^3 (750m^3)	6 months
Plastics	Empty plastic drums	2t	100m^3 (300m^3)	6 months

Table 7.1: Storage of Combustible Materials				
Combustible material	**Form**	**Quantity Stored**	**Storage capacity (comparison with EA limit)**	**Maximum storage time**
WEEE	Electronic equipment in containers	25t	100m^3 (450m^3)	6 months
Recovered paper and plastic waste stream	Sub-5mm particle size in containers	60t	100m^3 (450m^3)	6 months

8 PREVENTING FIRE SPREADING

8.1 Measures in place to prevent fire spreading are largely as outlined above. These measures will include management of stockpile sizes and adequate separation distances between stockpiles and between external storage areas and the site buildings. Stockpiles will be formed of tidily stacked bags or containers with no large piles of loose material on site.

8.2 In addition, if bays are to be used for waste storage they will be constructed from concrete and will have a fire resistance time of at least 120 minutes with properly constructed and sealed joints. A freeboard of at least 1m will be allowed in each bay to minimise the risk of flames catching and spreading from one bay to another across the top of the bays.

8.3 Adequate fire suppression will be provided as described in Section 10 below.

9 QUARANTINE AREA

9.1 A quarantine area will be provided to isolate wastes at risk of combustion or that are alight. Where a fire is suspected, and it is safe to do so, the wastes will be moved to the quarantine area as soon as possible to prevent the fire spreading to other wastes stored near-by.

9.2 The quarantine will be provided with impermeable surfacing and sealed drainage. It is located 10m from any buildings or stockpiles on site. The quarantine area will measure 10m x 10m and will be large enough to hold 50% of the largest stockpile on site, i.e. 125 tonnes of waste.

9.3 The quarantine area is located on the site plan, drawing number ST16653-003.

10 REDUCING THE IMPACT OF A FIRE

10.1 In the event of a fire, the following measures will minimise the impact and scale of any fire. These measures include systems for detecting fires, suppressing fires and fighting fires.

Table 10.1: Fire Detection and Suppression	
System	**Measures in Place**
Early detection	CCTV will be in place and will cover all waste storage areas. They system will use both visible and infra-red cameras allowing any fire to be visible on the monitor. In addition all of the buildings where waste is stored or treated will be fitted with a state of the art VESDA System (very early smoke detection apparatus). This system samples the air within the building and channels it through a laser detection chamber, capable if identifying very low levels of smoke in the air. These systems will be linked to a fire alarm, alerting staff to any issues.
Fire suppression systems	Currently there is no fire suppression system on site. As waste is stored in relatively small quantities it is considered that active firefighting measures provide adequate protection. Particularly as the fire detection system in place is very sensitive and will provide an early warning before any fire takes hold. The firefighting equipment within the buildings is subject to annual inspections and an independent company also complete a site audit to ensure that the correct number and type of extinguishing equipment is readily available.
Response to fire/smoke alarm	If the detection system is activated, then the personnel on site follow the emergency evacuation procedure and the Site Manager / trained personnel will investigate the reason for the alarm. They will then tackle the fire themselves, if safe to do so, whilst the emergency services are alerted. The 24hr CCTV monitoring company will alert key holders and emergency services out of operational hours.
Active fire fighting	Site specific Incident and Emergency procedures are detailed in the EMS. All site operatives are trained in the Fire Action, Fire Extinguisher and Incident and Emergency procedures. Their fire-fighting actions will be such that they are not putting their own safety at risk. Small fires will be tackled on site by trained and competent site operatives, under the supervision of the Site Management. This will utilise the existing fire-fighting extinguishers. Access for emergency vehicles will be maintained at all times via the main site entrance. Given the size of the waste stockpiles the volume of fire water that may be required to tackle a fire would be 666 litres per minute, based on the calculation provided in the Fire Prevention Plan Guidance.

Table 10.1: Fire Detection and Suppression	
System	**Measures in Place**
	There are two fire hydrants located close by; one at the corner of the site and another slightly further along the road. Each fire hydrant should be capable of delivering 540 litres per minute of water. This equates to over 1,000 litres per minute if both fire hydrants were employed. The River Calder is located directly next to the site should additional water be required. There is therefore an adequate water supply for firefighting.

11 MANAGING FIRE WATER

11.1 The site infrastructure has been designed to ensure that firewater is fully contained. Firewater will be managed as set out in table 11.1, below.

Table 11.1: Managing Firewater	
System	**Measures in Place**
Containment	The site is provided with impermeable surfacing, which is designed to fall to a large sealed sump with a capacity of 124m^3 providing capacity for at least 3 hours of firewater at the maximum required rate. The sump is concrete lined and will be subject to regular inspection to maintain its integrity. Firewater can therefore be fully contained on site.
Disposal	Following a fire, the firewater will be collected by tanker and will be sent to an appropriately permitted waste management facility for disposal or treatment.

12 DURING AND AFTER AN INCIDENT

12.1 Contingency measures are in place to allow waste to be diverted to another site if required. The site does not operate as a lone site; it is part of a larger group of 15 sites. The operator has the ability to close the site at short notice and divert inbound wastes to other sites within the group, the operator also has the ability to ask customers to hold their wastes for a short period of time, until alternative arrangements are made. This holding period will be a maximum of 5 working days.

12.2 Contingency measures are explained further in Table 12.1, below.

Table 12.1: Contingency Measures	
Item	**Measures in Place**
Emergency Plan	The site will operate an Incident and Emergency Procedure (Appendix 2) and an Emergency Preparedness and Response procedure that ensures all incidents are correctly recorded, reviewed and monitored and that preventative measures are

Table 12.1: Contingency Measures	
Item	**Measures in Place**
	implemented appropriately. The procedures will make clear who has responsibility for contacting the emergency services and instructing staff on site. All staff will receive training in order to be able to apply the procedures correctly. Copies of the procedures and records will be kept in site office, along with the inventory of the wastes and materials present. These will be made available to the emergency services. The procedure will contain emergency contact numbers for the Senior Management team, the Company Health and Safety Manager, Site Management and Technical Staff and other useful contact numbers such as near-by hospitals, the Environment Agency, Health and Safety Executive and Local Council.
Liaison with External bodies	A nominated manager will act as incident controller and will liaise with the Fire Service and Environment Agency during any incident to ensure that they are aware of the materials on site and any potential risks. In the event of a fire the emergency services will be contacted immediately. The Environment Agency will be informed as soon as possible and in any case within 24 hours, once immediate health and safety issues have been addressed.
Waste Diversion	Once a fire is detected no further waste will be accepted on site until the fire has been extinguished and any necessary clean-up or repairs have been completed to ensure that waste can be accepted without harm to health of risk to the environment. Arrangements will be made to divert waste to another of Waste Care's permitted waste transfer or treatment plants. Customers may be asked to hold waste for an additional few days whilst alternative arrangements are made. Wherever possible customers will be advised of these arrangements by telephone in advance of when the delivery is due.
Site Clean up	Following a fire all fire damaged materials will be removed to a suitable permitted site for disposal. The site will be swept clear and arrangements will be made for the collection and disposal of firewater. All site equipment and infrastructure will be inspected to check whether it is functioning correctly and repairs will be schedule for anything that has been damaged. The site will not reopen unless sufficient functional waste storage areas are available.

12.3 Measures are in place to prevent fires and if necessary detect and fight fires and mitigate against the possible environmental impacts as required in the Environment Agency's guidance.

APPENDICES

Appendix 1

Waste Acceptance, Storage and Processing

DATE: August 2018

1 WASTE ACCEPTANCE PROCEDURES

Pre-Acceptance

1.1 The waste types to be accepted on site arise from the centralised collection of household batteries at designated drop-off centres through national battery collection schemes. These schemes target the collection of mixed portable alkaline batteries. Deliveries will be made by Waste Care from their other UK waste transfer stations and from third parties.

1.2 All deliveries from third parties will be pre-notified to Waste Care for agreement. Batteries to be delivered from other Waste Care facilities will be notified to the site manager, with waste pre-acceptance checks being undertaken at the consigning site.

Acceptance

1.3 Materials to be processed at the site will be transported by a registered Waste Carrier and accompanied by a 'Waste Transfer Note' in accordance with the legal requirements of the Duty of Care for waste, or a consignment note, under the Hazardous Waste Regulations 2005. Waste will not be accepted if for any reason there is insufficient storage capacity available or if the site is inadequately manned.

1.4 Incoming waste deliveries will be met at the site entrance where acceptance checks will be carried out. Transfer notes or consignment notes will be reviewed and where possible each load will be subject to visual inspection to ensure it appears in line with the pre-acceptance information.

1.5 Loads will initially be inspected by suitably trained personnel to ensure that only permitted waste is accepted and to establish that the wastes are safe to offload. This will include checking the integrity of containers and pallets and looking for any signs of damage to batteries or packaging. Where the contents can be easily checked, such as battery boxes, an inspection will be undertaken of each box to ensure that the box actually contains the type of batteries expected. If the load consists of many smaller packages, then the initial inspection will only cover the packaging condition.

1.6 Subject to delivery passing the initial acceptance checks, waste will then be directed to the waste reception area for unloading.

1.7 Any discrepancies found as a result of the checks detailed above will result in:

- referral to the technically competent manager;
- referral to the producer site, to confirm the nature of the waste load;
- a written record being made in the site log to record the nature of the waste and the action taken; and

- referral to the Environment Agency in the case of possible breaches of legislation or imminent pollution.

1.8 Where waste is not in compliance the load will be rejected and will be returned to the waste producer where possible. Where this is not possible the waste will be directed to the quarantine area and arrangements will be made for it to be removed to a permitted site as soon as possible.

1.9 Loads (or part loads) may be rejected or placed in quarantine following their unloading in the waste reception area when:

- The container is highly contaminated with WEEE without prior consent;
- The container is highly contaminated with burnt or unidentifiable batteries without prior consent;
- The container is highly contaminated with non-battery material; or
- The container is highly contaminated with water.

1.10 The Waste Care non-conformance procedure will be followed in all non-conformance events.

1.11 Records will be kept for each load arriving on site including details of:

- date of delivery;
- the waste producer;
- quantity of waste;
- waste type;
- pertinent details regarding the waste appearance (smell, colour and physical form);
- classification under the List of Waste Regulations;
- six figure code according to the European Waste Catalogue; and
- waste carrier name, address and registration number.

1.12 All pre-acceptance and acceptance documentation will be made available for inspection by authorised officers of the Environment Agency on request.

2 WASTE STORAGE AND PROCESSING

General

2.1 The waste treatment process is undertaken in two phases. The initial phase sorts the mixed waste stream into the different component streams listed below:

Table 2.1 Battery Types to be Accepted and Sorted

Description	Includes	Classification
Zinc/manganese (often referred to as alkaline batteries)	Alkaline Zinc chloride Zinc air Oversize zinc/manganese	Non-hazardous
NiCad	Dry NiCad Wet NiCad	hazardous
Lead Acid	Dry (VRLA – plastic case) Dry-Cylon (steel case) Wet	hazardous
Lithium Ion	Laptop and cells Power tools Mobile phones Video cameras E-cigarettes	Non-hazardous
Lithium Ion Polymer	Tablet/laptop Mobile phone	Non-hazardous
Lithium primary	Coin cells Non-coin cells	Non-hazardous
Nickel Metal Hydride (NiMH)	All sizes	Non-hazardous
Button cells	Zinc air Silver oxide Alkaline	hazardous
Non-battery material	Small WEEE Water filters (incidental to battery loads only) Light bulbs (including CFL) Printer ink cartridges (incidental to battery loads only) General litter (incidental to battery loads only)	Non-hazardous, except compact fluorescent lamps, which are hazardous

2.2 The second phase treats only the portable alkaline non-hazardous batteries to separate the different components for recovery:

- black mass;
- ferrous metal,
- non-ferrous metal; and
- paper and plastic.

2.3 A site layout plan is provided as drawing reference ST16652-003.

Waste Reception

2.4 Wastes will be unloaded in the waste reception area and transferred to the storage area for wastes pending treatment. Pre-sorted loads of alkaline batteries will be stored separately as these will be introduced to the process via a hopper connected to the conveyor that transfers portable alkaline batteries to the second phase of the treatment plant.

2.5 All sorted batteries will be weighed using pallet scales. The scales are calibrated annually by a third party and checked daily using battery boxes of sand of known weights, as well as confirming zero readings when unloaded. These daily checks will be recorded, signed for and filed.

2.6 Occasionally, staff will encounter a battery that they will not be able to identify. Any such batteries will be quarantined for further assessment. Site personnel will also have access to the internet so that they can investigate the chemistry or application of any unknown batteries after placing them in quarantine.

2.7 The facility has a laboratory, equipped with tools, scales and a voltage meter, where further work can be undertaken to try and establish the chemistry of the battery. Its weight can also be checked and visual inspection will establish if it is sealed. The battery cells may be removed from any casing to try and help establish its chemistry as this may be shown on individual cells in a pack. Magnets can also be used to establish if the battery casing is magnetic.

Quarantine Area

2.8 A quarantine area surrounded by concrete walls has been established to receive items that may need to be returned or require special control measures. The quarantine area provides a storage capacity for up to 50m^3.

Waste Processing

2.9 The majority of batteries received at site are from public collection points and are suited to mechanical sorting due to the types of batteries in the mix. There are two separate phases at the facility.

Phase 1 – Sorting

2.10 The sorting phase will be undertaken in Unit 3 as shown on drawing ST16653-003.

2.11 Sorting processes at the facility will utilise mechanical sorting equipment to sort batteries by size before presenting batteries to sorting personnel on conveyors for manual sorting by chemistry, where automated sorting is not possible.

2.12 A fork lift truck with a rotator will tip containerised batteries into the hopper at the start of the sorting line. The hopper will feed a conveyor for the manual removal of non-battery items such as litter and plastic bags. The batteries will then pass over a vibrating table with an initial small grid, which will allow the button cells to be separated. These will drop through the grid directly into and appropriate button cell box. The remaining batteries will pass over a larger grid which will separate the oversize batteries from standard household batteries. This sort is purely by size and not chemistry, type or weight.

2.13 The medium sized batteries will then pass along a conveyor, where batteries will be hand sorted according to chemistry. The portable alkaline batteries, which are suitable for further treatment, will be collected at the end of the conveyor.

2.14 Large batteries will also be sorted by hand and transferred to the appropriate storage areas.

2.15 Sorted batteries will be stored in appropriate containers as set out in Table 2.2 below.

Table 2:2 Battery Storage

Battery types	Container type	Storage capacity
NiMH	large fibre bags	40t
portable NiCad	large fibre bags	100t
lithium	UK and EU approved plastic drum or box	250t
button cells	UK and EU approved plastic box	120t
Industrial NiCd wet NiCd	weather proof containers	100t

Lead acid	Plastic battery boxes	120t
Alkaline portable	large fibre bags	6000t
Mixed batteries at front end	large fibre bags , UK and EU approved plastic drum or box	1000t

2.16 Different types of batteries will be stored separately at the locations shown on drawing ST16653-003. Wet lead acid and wet alkaline NiCad could be viewed as incompatible and will not be stored together or adjacent to each other.

2.17 All recovered battery streams will be sent for recycling.

2.18 WEEE and residual waste will be stored separately in suitable bags or containers. Where possible these wastes will be sent on for recycling. Paper, plastic and similar wastes may be sent for energy recovery.

2.19 All staff involved in sorting will be trained to classify batteries into the correct category and chemistry. Training will consist of a mixture of tool box talks and documents that are posted around site. The training room at the site is also stocked with various types and chemistries of batteries to assist training sessions on battery classification by type and chemistry, as well as safety. A notice board in the sorting area will be used to reinforce the key messages for staff working on battery sorting.

Phase 2 – Treatment of Portable Alkaline Batteries

2.20 Portable alkaline batteries will be transferred via enclosed conveyor to the hammermill, located in treatment building as shown on drawing ST16653-003. The treatment process is designed to separate out the following material streams as listed in Table 2:3 below:

Table 2:3 Recovered Material Streams from Treated Batteries

Material Stream	%	Fate
Black mass	60	Recycling
Ferrous metal	25	Recycling
Non-ferrous metal	2	Recycling
Paper and plastic	13	Energy recovery

2.21 Batteries will be crushed using a hammermill. The resultant mixed material will pass over a drum magnet to remove any ferrous metal before being treated by a vibro-separator to remove the black mass fraction from the remaining material. The black mass will pass through the

screen and will be collected in an enclosed conveyor and passed via a screw mechanism into sealed bags.

2.22 The remaining material will then pass over an eddy current separator which will repel the non-ferrous metal fraction, causing it to fly off the belt into a hopper and allowing it to be separately collected. The remaining paper and plastic fraction will be collected in a dedicated container.

2.23 The alkaline battery treatment plant will treat between 2.5 and 4.5 tonnes of batteries per hour, depending on the feedstock.

2.24 Recovered material streams will be stored in appropriate bags or stillages at the location shown on drawing ST16653-003.

Appendix 2

INCIDENT AND EMERGENCY PROCEDURE WasteCare Ltd

SITE LICENCE NO: EPR/WP3431RT

DATE: July 2016

ISSUE NUMBER: 1

THIS IS TO FORM PART OF THE MANAGEMENT SYSTEMS OF THE SITE

IMPORTANT

This section is divided into 8 parts. Turn to Part 3 in the event of an accident. All employees should read Parts 1, 2 and 3 and familiarise themselves with emergency procedures in the areas within which they work.

1 PART 1 DEFINITIONS

1.1 The INCIDENT most likely to arise at the Halifax site are:

a. Release of substances – liquids – chemicals .
b. Fire.
c. Collisions from vehicles.
d. Incidents outside the site affecting the site.

1.2 An **INCIDENT** is a situation which involves one or more of the following:

a. Fire or threat of fire of any size or damage to a part of the plant or site or injury to people.
b. Release of material which could make a section of the site unworkable or which may affect people's health immediately or later.
c. The mobilisation of incident teams, first aiders, fire or the emergency service.

1.3 An **EMERGENCY** is a situation which involves one or more of the following:

a. The possibility of multiple casualties which may require hospital treatment.
b. Damage or loss on more than one part of the site.
c. Release of material likely to render untenable a significant proportion of the site.
d. Release of material likely to cause significant effects on the local environment and areas surrounding the site.

1.4 A **DISASTER** is a situation where the emergency resources of the Company are deemed to be inadequate and outside assistance is required.

1.5 The INCIDENT ZONE is that part of the site likely to be affected by events and will be defined by the Incident and Emergency Controller after consideration of:

a. Nature of the work/process involved.
b. Nature of the incident.
c. The proximity and character of other plan buildings.
d. Physical factors, especially wind force and direction.

1.6 The INCIDENT PROCEDURE can be summarised as follows:

a. Attendance to the incident by personnel in the working areas.
b. Attendance by the Incident Controller.
c. Action limited to minor firefighting or to control of emissions or spillages at source.
d. First aid treatment.
e. Preparation of an incident report and review of procedures and working practices in the light of the incident.

1.7 The EMERGENCY PROCEDURE can be summarised as follows:

a. Attendance to the incident by personnel in the working area.
b. Escalation of the incident to an emergency because of fire or by decision of the Incident

Controller.

c. Establishment of the emergency control centre and callout of the emergency services.
d. Works or office evacuation or the whole site and call out public services.
e. Preparation of reports. Enquiries into caused and methods of future prevention. Revision of procedures.

2 PART 2 RESOURCES

2.1 The EMERGENCY CONROL CENTRE is established in the office block. This has the telephone points for call out of emergency services if required and will have an emergency kit, this will comprise of:

a. Copies of EMERGENCY PROCEDURE for site.
b. Site Plan, showing storage area of absorbent for spillage retention and fire extinguisher points.
c. Current list of all employees for this site.

2.2 If the office block is not safe for use, the assembly point will be used as a control centre and emergency services will be contacted by the use of mobile telephones.

2.3 The INCIDENT TEAM shall be as follows:

a. The Facility Manager / nominated person b. Chemical Advisor.
b. First Aider(s).
c. Area Supervisor.

Emergency Equipment

a. EXTINGUISHERS & FIXED FIRE FIGHTING EQUIPMENT – Suitable types are distributed throughout the site and employees should familiarise themselves with their position and use.
b. FIRE HYDRANT – Four hydrant points are located within 1 metre of the site.

3 PART 3 ACTION DURING AN INCIDENT

Raising the Alarm

3.1 During Working Hours – On Release of a Substance

a. Report the details to the Site Supervisor or Facility Manager.
b. Take ALL possible action to stop any further spillage or emission, and to contain the release without taking any personal risk.
c. The Site Supervisor or Facility Manager will decide whether or not to activate the emergency procedures.

3.2 On Discovery of a Fire

a. RAISE THE ALARM and seek immediate assistance. If possible attack fire with extinguishers without taking any personal risk.
b. If the fire is not controllable with extinguishers inform the Site Supervisor or Facility Manager who will assess if external emergency services are required.
c. The Facility Manager, Site Supervisor, or when they are not available the individual discovering the fire will call the emergency services.
b. If possible SWITCH OFF ELECTRICAL POWER to any equipment in that area.
c. Ensure that the discharge point on site is closed, to prevent any contaminated water leaving site.
d. If external emergency services have been called follow the EVACUATION PROCEDURE (Section 3.2).

3.3 Outside Normal Working Hours

a. In the event of a fire contact Emergency Services.
b. In the event of a release of a substance phone Key Personnel i.e. Facility Manager or Site Supervisor.

Emergency Evacuation

3.4 On instruction of Site Supervisor / Facility Manager evacuation will proceed as follows:

a. Except for people engaged with the Incident or Emergency, all personnel will evacuate their work area and proceed in an orderly manner to the designated Assembly Points.
b. No attempt must be made to collect personnel belongings or remove cars from the site unless directed to do so by the Facility Manager/nominated person, Fire Officer or Police.
c. Drivers of commercial vehicles on the site roads must leave their keys in the ignition in case the vehicle requires moving after evacuation.
d. Supervisors will hold a roll call and any discrepancies reported to the Facility Manager/nominated person or Emergency Services.
e. Employees will not leave their Assembly Points unless told to do so by Facility Manager/nominated person or Emergency Services.
f. The work areas will be re-occupied on the instructions of the Facility Manager/nominated person or Emergency Services.

Responsibilities Of The Facility Manager/Nominated Person

a. When notified of the Incident/Emergency and its location, proceed immediately to the scene.
b. Assess the scale of the Incident, define the Incident Zone and decide if an emergency exists or is likely. On his decision he will activate the Emergency Procedures.
c. Direct all operations within the Incident Zone with the following priorities.
d. Secure the safety of the personnel.
e. Minimise the damage to plant, property and the environment
f. Minimise the loss of material.
g. Direct all operations within the Incident Zone.
h. Direct Rescue and Incident Control Operations until the arrival of the Emergency Service.
i. Ensure the Incident Zone is searched for casualties.
j. Ensure non-essential workers are evacuated from the Incident Area.
k. Establish communications by mobile phone with the Emergency Control Centre.
l. Pending the arrival of the Emergency Services, direct the shutting down and evacuation of the plant and areas threatened by the Emergency

Responsibilities Of First Aiders

3.5 The First Aider(s) will proceed to treat and/or assess any injuries and arrange through Supervisor/Facility Manager if hospital treatment is necessary. He will also be responsible for recording names and nature of the injuries of any casualties.

Responsibilities Of The Chemical Advisor

3.6 The Chemical Advisor will work with the Emergency Services to:

a. Identify chemicals in the incident zone b. Identify potential hazards.
b. Advise on safe practice in the incident zone.
c. Make recommendations on neutralising any hazardous substance.

Public Services

a. FIRE BRIGADE – The Senior Fire Officer present has total authority. His main aim will be to contain the emergency as rapidly as possible so as to protect life. In practice, the Fire Brigade will certainly make full use of any advice and assistance available on site and will certainly make full use of any advice and assistance available on site and will share our interest in reducing the overall consequences of the emergency. The Fire Brigade will be called to any incident involving FIRE or an EMISSION where the source cannot be isolated to prevent escalation of the incident.
b. POLICE – The Police have over-riding authority where the public is threatened or where life is lost or where investigation may be necessary. Personnel will be requested to give whatever assistance they can. In other matters (e.g. site security,) the site administrations will liaise with the Police.
c. ENVIRONMENTAL CONTROL – The Facility Manager/Duty Technician will involve the

Environment Agency, Health & Safety Executive and Local Environmental Health Officers as appropriate. The Environmental Agency & Environmental Health must be informed whenever an emission occurs affecting the general public.

Local Residents, Members Of The Public And The Media

3.7 The Facility Manager or Nominated Person will ensure that all local residents have been notified of the nature of the incident and the potential that they may be affected by smoke in the event of a fire on site.

3.8 The Facility Manager or Nominated Person will work with the Environment Agency & Environmental Health to ensure that the local residents have the correct information and instructions as to how to prevent harm to themselves and their property.

3.9 The Facility Manager or Nominated Person will give local residents the contact details for the Facility Manager and the Environment Agency & Environmental Health, so that they can raise their own concerns.

3.10 DO NOT allow them to access the site under any circumstances. Treat them with respect at all times and inform them that statements will be issued in due course. If it is a member of the public that has raised the alarm, take the name, address and contact telephone number and assure them that the Company will contact them as soon as possible. DO NOT SPECULATE AS TO THE CAUSE OF THE EMERGENCY.

Incident Reports

3.11 Apart from any reports required by outside bodies (e.g. HSE) a brief report of all incidents has to be submitted to the Health and Safety Manager as soon as reasonably possibly after the event.

4 PART 4 ASSEMBLY POINT

4.1 This has been designated as outside of the main gates, away from any traffic, the area is clearly marked. The Site Supervisor must be responsible for checking all the employees assembled at this point.

5 PART 5 TELEPHONE NUMBERS

Function	Name	Home/Night Tel No
Facility Manager	Mr Hassan Ali	07501 489102
Operations Manager	Mr Gavin Smith	07920 412479
Managing Director	Mr Peter Hunt	07796 612543
Operations Director	Mr Graeme Parkin	07501 494496
Health & Safety Manager	Mr Paul Tiffany	07552 120791
Group Compliance Manager &	Mrs Helen Kellett	07795 400071
Technical Manager / Chemical	Mr Stuart McNish	07552 163687
Environment Agency	National Number	0800 80 70 60
Yorkshire Water		0345 1 24 24 24
Health and Safety Executive	To report fatality or major	0345 300 9923
Fire Station		999
Out of hours security / CCTV	4 Site Security Ltd	0113 200 2060

Out of Hours Contact Details

5.1 Telephone any of the above numbers for information regarding the site.

5.2 The site has 24/7 CCTV and alarm system monitoring, the contact details are: IPM Security.

5.3 Intelligent Protection Monitoring Ltd, Westhorpe Business Innovation Centre, Westthorpe Fields Road, Killamarsh, Sheffield S21 1TZ.
www.ipmsecurity.co.uk
Telephone: 0114 218 0680

5.4 IPM Security holds an up to date list of key holders for the site, along with contact names and numbers. IPM can also remotely access the site; this would allow emergency services onto site without the need for a key, key holder or security access fob.

6 PART 6 INCIDENT AND EMERGENCY PROCEDURES FOR CONTRACTORS

a. On arrival at site, contractors must report to the Facility Manager. Contractors working in offices must ensure that the administration staff or other responsible person is aware of their presence.
b. Contractors must receive a copy of these procedures on arrival on site.
c. Whilst it is the contractors' responsibility to ensure their work methods are safe, the Company has the power and legal obligation to ensure that ANYONE working on the Company's premises does so in compliance with the law and safe practices. You must therefore observe any reasonable instructions given by a company employee with regard to safety.
d. No hot work or confined space work may commence without a signed Work Permit which is obtained from the Facility Manager.
e. Contractors and their employees must familiarise themselves with the location of the nearest firefighting equipment to their work.
d. The following section lay down the procedure in case of an emergency.

On Discovery of a Fire During Working Hours

a. RAISE THE ALARM and seek immediate assistance and if possible attack the fire with the firefighting equipment without taking any personal risks.
b. If the fire is controllable, inform a Supervisor or the Facility Manager.
c. If possible, switch off electrical power to anything affected or threatened by the fire.
d. If the alarm has been sounded, follow the evacuation procedure.

On Release of a Substance During Working Hours

e. Report the details to nearest company employee.
f. Take all possible action to prevent further spillage or emission and contain the release without taking any personal risk.

6.1 The Facility Manager/nominated person will decide whether or not to activate the alarm and evacuation will procedure.

7 PART 7 INCIDENT AND EMERGENCY PROCEDURES FOR DRIVERS

a. The site is open for deliveries between 0600hrs and 1800hrs. Deliveries after normal hours must be notified beforehand to ensure offloading personnel are available.
b. Drivers must receive a copy of this procedure.
c. Whilst it is the drivers' responsibility to ensure their work methods are safe, the company has the power and legal obligation to ensure that ANYONE working on the Company's premises does so in compliance with the law and safe practices. You must therefore observe any reasonable instructions given by Company employee with regard to safety.
d. On arrival on site, all vehicles must report to the Site Supervisor to receive instructions. They will need to be directed to the loading/unloading points where they must report to the Facility Manager/Site Supervisor.
e. Drivers must familiarise themselves with the location of the nearest Fire Fighting equipment to their work.

7.1 The following sections lay down the procedure in case of an Emergency:

On Discovery of a Fire During Working Hours

a. RAISE THE ALARM and seek immediate assistance. If possible attack the fire with the site's firefighting equipment without taking any personal risks.
b. If the fire is controllable, inform a Site Supervisor or the Facility Manager.
c. If possible, switch off electrical power to anything affected or threatened by the fire
d. If the alarm has been sounded, follow the evacuation procedure.

On Release of a Substance During Working Hours

a. Report the details to nearest company employee.
b. Take all responsible action to prevent further spillage or emission and contain the release without taking any personal risk.
c. The Facility Manager/nominated person will decide whether or not to activate the Emergency Procedure.
d. If the incident justifies Emergency Evacuation, the Facility Manager/nominated person will activate the alarm and evacuation will proceed.
e. If evacuation is necessary, then keys must be left in the ignition of all vehicles

8 PART 8 WASTE AND FIRE WATER DISPOSAL PROCEDURE

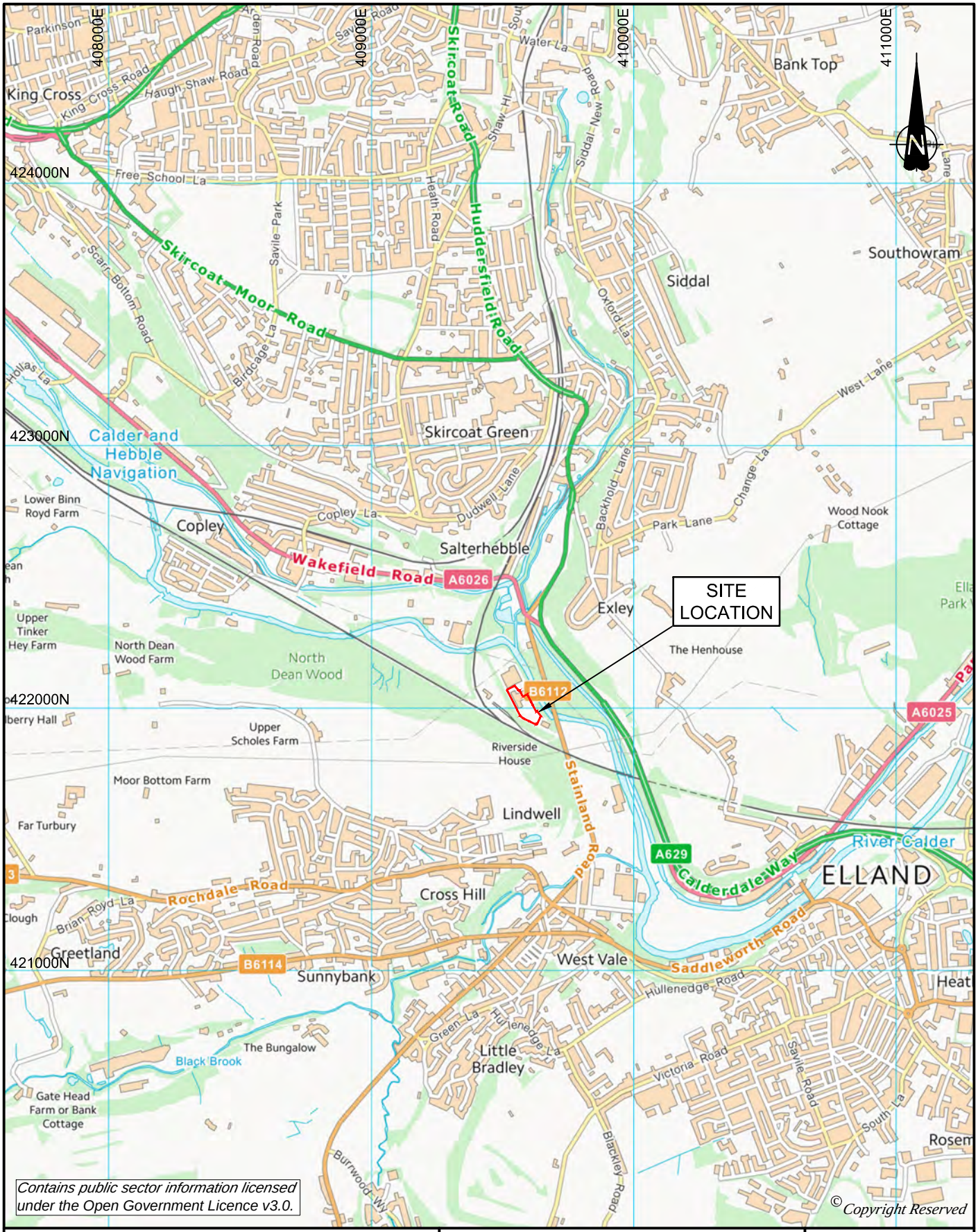
8.1 After an incident, there is likely to be an amount of waste on site will have been affected by the incident. Following a fire on site, the water contained on site will need to be sent for treatment using a third party.

8.2 In the event of emergency, the fire water is required to be removed off site immediately to avoid it entering the main sewage system.

8.3 A local tanker company must be sourced along with a treatment facility to keep the volume of water on site at a minimum. The company chemical advisor, the Environmental Compliance Manager and the Environment Agency will agree that the treatment facility is suitable and permitted to treat the volume of fire water and any contaminants.

a. The company chemical advisor will sample wastes on site and all contained fire water.
b. The company chemical advisor will arrange for samples to be analysed by either the laboratory based at the company's Leeds based facility or if more convenient a laboratory offering a nationwide service. The company's preferred external laboratory is Alcontrol.
c. The company Chemical Advisor, Technical Manager and Environmental Compliance Manager will decide where the wastes will go for final disposal or further treatment after analysing the laboratory results and sending pre- acceptance samples to the potential outlets.
d. Despatch all wastes and fire waters using the correct consignment note and copies retained by the company.
e. The company Chemical Advisor will keep in touch with the fire water treatment facility and the waste disposal/treatment outlets to ensure that there are no issues.

DRAWINGS



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CLIENT: WasteCare	DRG No.: ST16653-001		REV: A
	SIZE: A4	SCALE: 1:20,000	DATE: 20/02/18
PROJECT: Wastecare Environmental Permit Application	DRAWN BY: SJB	CHECKED BY: LP	APPROVED BY: LP
DRAWING TITLE: Site Location Plan			

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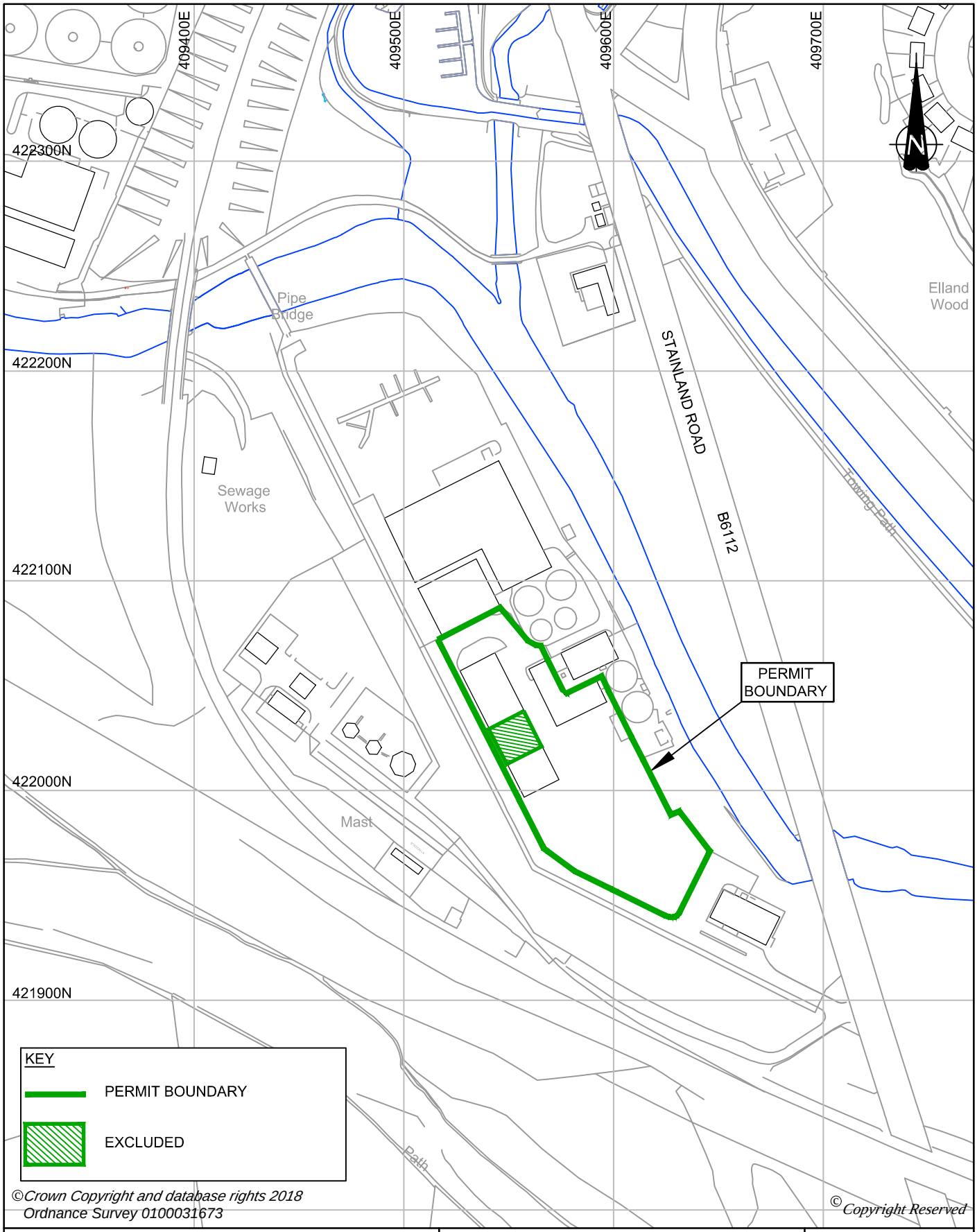

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CLIENT: WasteCare	DRG No.: ST16653-002		REV: A
PROJECT: Wastecare Environmental Permit Application	SIZE: A4	SCALE: 1:2500	DATE: 20/02/18
	DRAWN BY: SJB	CHECKED BY: LP	APPROVED BY: LP
DRAWING TITLE: Permit Boundary Plan			

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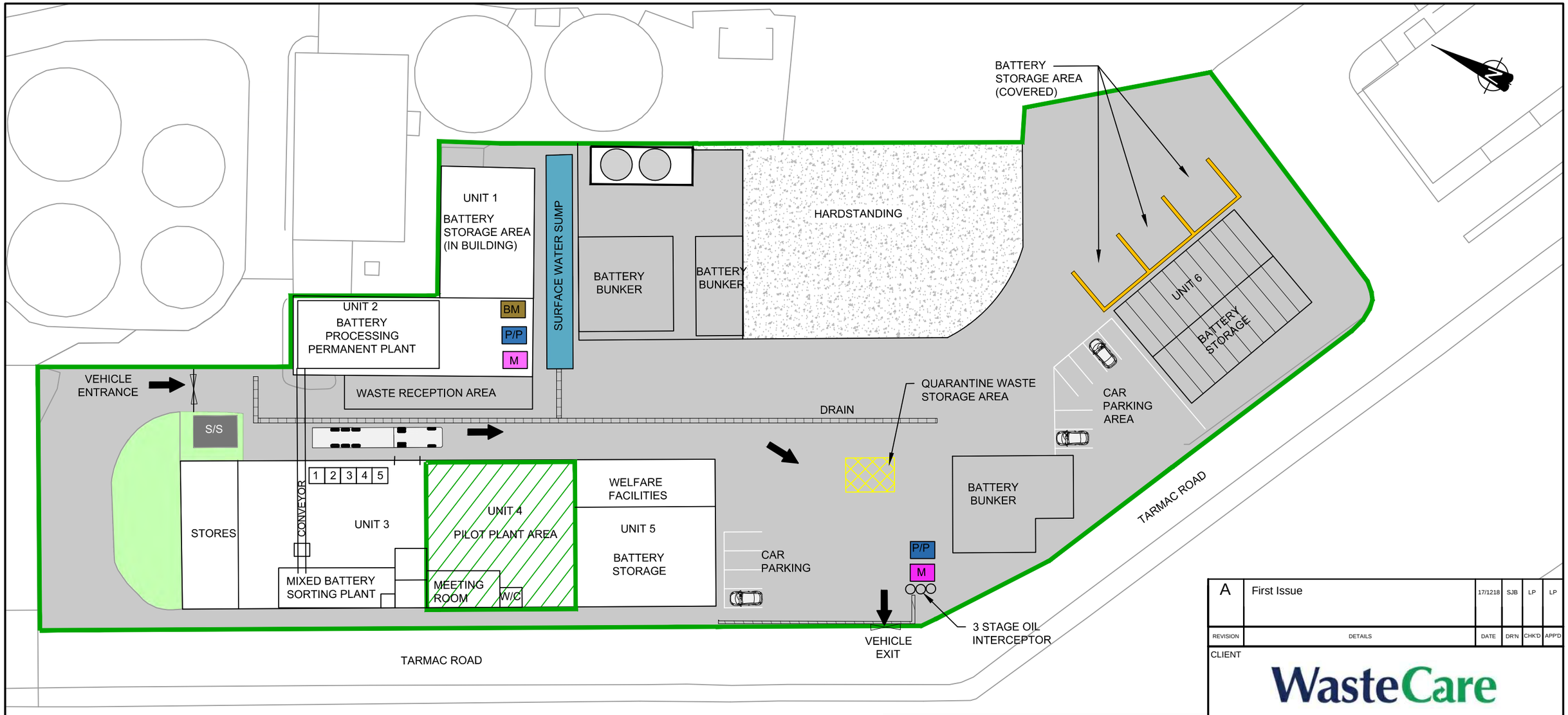

KEY

- ENVIRONMENTAL PERMIT BOUNDARY
- GATE
- BM — BLACK MASS STORAGE AREA
- P/P — PAPER AND PLASTIC STORAGE AREA
- M — METAL STORAGE AREA
- AREAS PROVIDED WITH IMPERMEABLE PAVEMENT
- SUB STATION
- GRASS AREA
- CONCRETE HARDSTANDING
- ONEWAY FLOW OF TRAFFIC
- EXCLUDED
- 1 | 2 | 3 | 4 — SEPARATED BATTERIES STORED BY TYPE

REVISION	DETAILS	DATE	DR'N	CHK'D	APP'D
A	First Issue	17/1218	SJB	LP	LP

CLIENT: WasteCare

PROJECT: Battery Treatment Facility

DRAWING TITLE: Site Layout & Drainage Plan

DRG No.	REV
ST16653-003	A

DRG SIZE	SCALE	DATE
A3	1:500	07/08/18

DRAWN BY	CHECKED BY	APPROVED BY
SJB	LP	LP

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422000N

SURFACE WATER SUMP FOR USE ON A WATER SOURCE OR AS POINT COLLECTION FOR FIREWATER

BATTERY STORAGE AREA (COVERED)

UNIT 1
BATTERY STORAGE AREA (IN BUILDING)

SURFACE WATER SUMP

BATTERY BUNKER

BATTERY BUNKER

HARDSTANDING

FIRE HYDRANT LOCATION

UNIT 6
BATTERY STORAGE

UNIT 2
BATTERY PROCESSING PERMANENT PLANT

BM

P/P

M

WASTE RECEPTION AREA

VEHICLE ENTRANCE

S/S

DRAIN

QUARANTINE WASTE STORAGE AREA

CAR PARKING AREA

ALL AREAS OF SITE PROVIDED WITH IMPERMEABLE PAVEMENT AND SEALED DRAINAGE

TARMAC ROAD

1 2 3 4 5

CONVEYOR

STORES

UNIT 3

MIXED BATTERY SORTING PLANT

UNIT 4
PILOT PLANT AREA

MEETING ROOM

W/C

WELFARE FACILITIES

UNIT 5
BATTERY STORAGE

BATTERY BUNKER

CAR PARKING

P/P

M

3 STAGE OIL INTERCEPTOR

VEHICLE EXIT

TARMAC ROAD

409500E

422000N

KEY

- ENVIRONMENTAL PERMIT BOUNDARY
- GATE
- BM — BLACK MASS STORAGE AREA
- P/P — PAPER AND PLASTIC STORAGE AREA
- M — METAL STORAGE AREA
- AREAS PROVIDED WITH IMPERMEABLE PAVEMENT
- S/S — SUB STATION
- GRASS AREA
- HARDSTANDING -PERMEABLE
- ONEWAY FLOW OF TRAFFIC
- FIRE ENGINE
- FIRE EXTINGUISHER - FOAM
- FIRE EXTINGUISHER - CO_2
- FIRE EXTINGUISHER - POWDER

BUILDINGS EQUIPPED WITH VESDA FIRE DETECTION SYSTEM. EXTERNAL WASTE STORAGE AREAS EQUIPPED WITH INFRARED CCTV.

- EXCLUDED
- 1 2 3 4 — SEPARATED BATTERIES BY TYPE

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REVISION	DETAILS	DATE	DR'N	CHK'D	APP'D
A	First Issue	17/12/18	SJB	LP	LP

CLIENT: WasteCare

PROJECT: Battery Treatment Facility

DRAWING TITLE: Fire Prevention Plan

DRG No.	REV
ST16653-006	A

DRG SIZE	SCALE	DATE
A3	1:500	07/08/18

DRAWN BY	CHECKED BY	APPROVED BY
SJB	LP	LP

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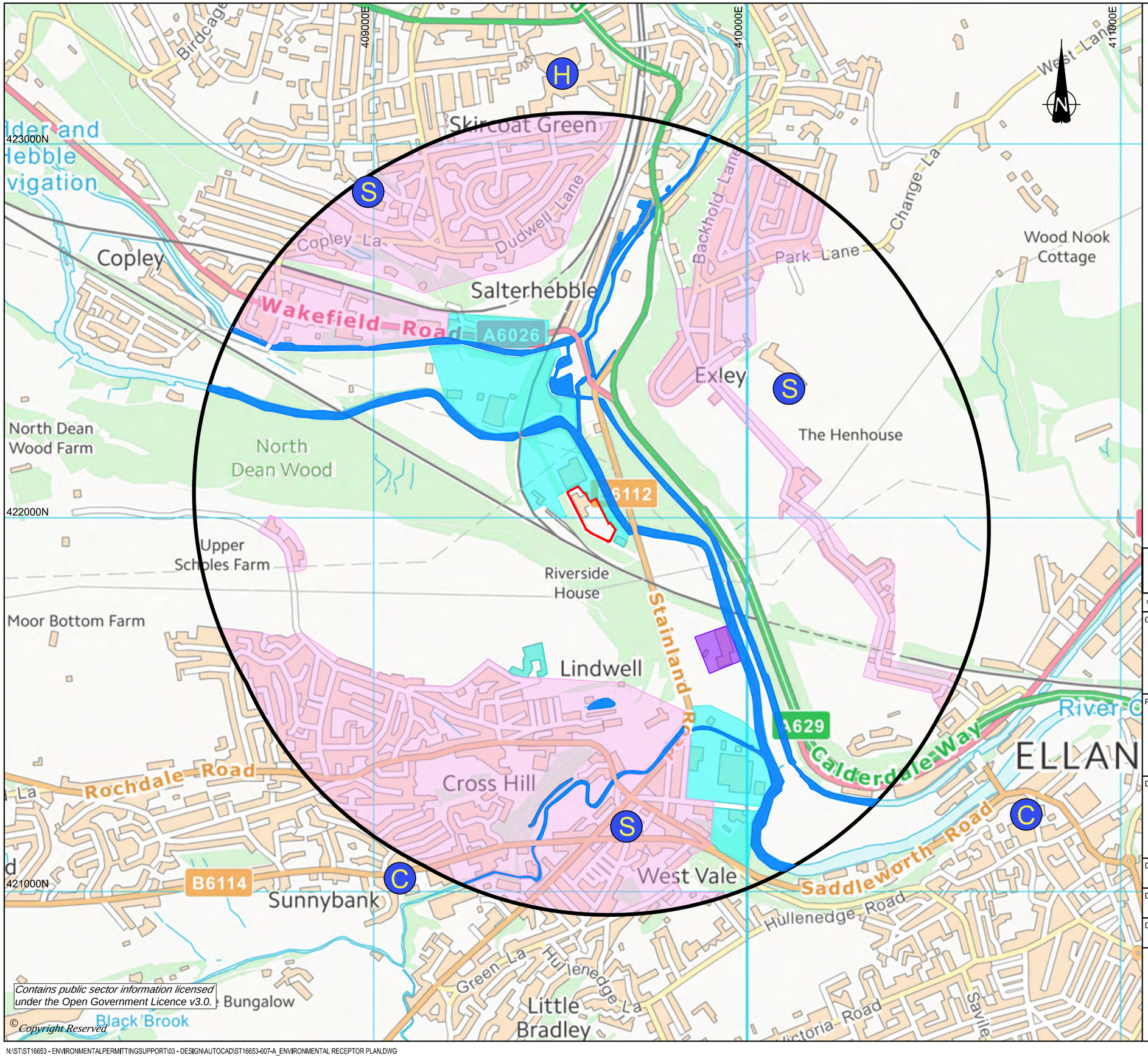

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KEY

- SITE LOCATION
- 1KM BOUNDARY OFFSET FROM SITE
- RESIDENTIAL
- INDUSTRIAL
- COMMERCIAL
- SURFACE WATER
- H — HOSPITAL
- S — SCHOOL
- C — CARE HOME

NOTE:
NO EUROPEAN HABITATS SSSI's WITHIN 1km

REVISION	DETAILS	DATE	DR'N	CHK'D	APP'D
A	First Issue	17/12/18	SJB	LP	LP

CLIENT

WasteCare

PROJECT

Wastecare Environmental Permit Application

DRAWING TITLE

Environmental Receptor Plan

DRG No.		REV
ST16653-007		A
DRG SIZE	SCALE	DATE
A3	1:10,000	20/02/18
DRAWN BY	CHECKED BY	APPROVED BY
SJB	LP	LP

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