
MEARCLOUGH ROAD WASTE TREATMENT FACILITY PERMIT VARIATION APPLICATION

Appropriate Measures Assessment

Appendix K
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Ellete Waste Limited

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Contents

1 INTRODUCTION 4

Tables

Table 1-1 - Appropriate measures for non-hazardous and inert waste..... 5

1 INTRODUCTION

1.1.1 This appropriate measures assessment has been carried out in support of an application to vary environmental permit EPR/NP3699ZH for a Waste Treatment Facility (WTF) operated by Ellete Waste Limited at Mearclough Road, Halifax, HX6 3LF.

1.1.2 The Environment Agency guidance for appropriate measures for non-hazardous and inert waste¹ applies to the facility as it is a waste treatment facility that handles and stores non-hazardous and inert waste. The Environment Agency Sector Guidance Note S5.06 Guidance for the Recovery and Disposal of Hazardous and Non Hazardous Waste² has also been used. Sections of S5.06 which apply to the operations and are covered by the appropriate measures for non-hazardous and inert waste are:

- Pre-acceptance procedures to assess waste
- Acceptance procedures when waste arrives at the installation
- Waste storage
- Treatment - general principles
- Emissions control
- Management
- Raw materials
- Waste handling
- Waste recovery of disposal
- Accidents
- Noise
- Monitoring

1.1.3 The following sections assess the appropriate measures for the facility as a whole.

¹ <https://www.gov.uk/guidance/non-hazardous-and-inert-waste-appropriate-measures-for-permitted-facilities>

² https://assets.publishing.service.gov.uk/media/5a7ca4ae40f0b6629523adf8/LIT_8199_dd704c.pdf

Table 1-1 - Appropriate measures for non-hazardous and inert waste

1.4 Site design and suitability	
	You should consider the potential impacts of climate change when selecting a site, especially: • flood risk • drought • extreme temperatures • extreme weather events You should have enough space on site to manage wastes and to make sure that you minimise potential pollution impacts on nearby receptors. For example, you should have enough space for appropriate fire breaks between stockpiles of combustible waste, and to allow access for fire-fighting. The storage and handling of waste on site must be located as far as technically and economically possible from sensitive receptors and watercourses, while minimising unnecessary handling. Access doors should be on the side of any buildings that are opposite to sensitive receptors. You must have enough space on site to operate your plant and equipment safely, and to segregate waste to prevent cross-contamination. Environmental permits set limits on the amount of waste an operator can bring onto site on an annual basis. The permit may also set other capacity limits, for example the maximum quantity of a particular waste type at any one time. The physical capacity of your site may not be large enough to safely handle, without causing pollution, the amount of waste your permit allows. You must make sure that the quantities of waste at your facility are manageable at all times and do not exceed your capacity to store and treat waste. At the design stage you should consider: • how you will monitor emissions from your site • the access to waste treatment processes so you can take representative samples
Response/evidence	The site is an existing permitted waste facility which was first issued with a licence in July 1995 prior to climate change considerations being required. The building will provide protection to the wastes from events such as flooding, or other extreme weather events. In the event of drought, where water usage would be limited, the inert and excavation wastes stored externally would be covered to prevent dust emissions. Other wastes stored externally are stored within skips which offer additional protection. The facility has enough space to carryout the permitted activities in a manner which does not cause environmental impact. This is achieved by the layout of the site which includes separate external bays for inert and excavation wastes, skips within bays, a building for the storage of separated fractions and treatment of non-hazardous wastes. The building has roller shutter doors which helps to reduce fugitive release into the environment. There is enough space within the facility to allow for mobile plant and vehicle movement. A fire prevention plan sets out the provisions for fire fighting. The facility will only have a maximum of 300m³ of waste stored at any one time. This volume can be stored and handled within the facility without potential pollution impacts on nearby receptors.
Compliant?	Yes
1. General management appropriate measures	
2.1 Management system	
	1. You must have an up-to-date written management system, and activities at your facility must follow it. Your management system must incorporate the following features. You have: • management commitment, including from senior managers • an environmental policy that is approved by senior managers and includes the continuous improvement of the facility's environmental performance, so you can identify pollution risks and minimise them through appropriate measures You plan and establish the resources, procedures, objectives and targets needed for environmental performance alongside your financial planning and investment. You implement your environmental performance procedures, paying particular attention to:

- staff structure and relevant responsibilities
- staff recruitment, training, awareness and competence
- communication (for example of performance measures and targets)
- employee involvement
- documentation
- effective process control
- maintenance programmes
- management of change
- emergency preparedness and response
- making sure you comply with environmental legislation.

You check environmental performance and take corrective action, paying particular attention to:

- monitoring and measurement
- learning from incidents, near misses and mistakes, including those of other organisations
- records maintenance
- independent (where practicable) internal or external auditing of the management system to confirm it has been properly implemented and maintained.

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

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

- as a result of substantiated pollution incidents
- when reviewing management systems
- when planning investment decisions, for example new items of plant
- When designing new plant, you must assess the environmental impacts from the plant's operating life and eventual decommissioning. You must make sure that new plant is authorised by your environmental permit.

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

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

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

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

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

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

- impermeable surfacing and drainage system
- ducts of abatement systems

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

	Your management system must clearly set out the actual physical capacity of your facility to store and handle waste, which may be less than the quantity limits allowed by your permit. You must specify limits for the maximum: - waste storage capacity at any one time - daily and annual throughputs - residence time for waste When doing this, you must take into account the characteristics of your facility and the waste types and the pollution risks, for example fire and odour. Your limits must also reflect the constraints of the available space and waste handling processes. You must include factors like seasonal changes in supplies of inputs, and markets for outputs. More information on understanding capacity is available in our RGN 2 guidance.
Response/evidence	An environmental management system (EMS) will be in place prior to the facility carrying out the updated operations, as already set out in Section 2.1 of the main supporting information document. This will include those documented systems required by the Environmental Permit to identify and minimise risks of pollution including those from operations, maintenance, accidents, incidents and non-conformances; site closure and risks drawn to the attention of the operator as a result of complaint. The management system will be reviewed at least once every four years or sooner where there is a significant change to the activities, or in the event of recommendations arising from investigations of accidents, incidents, emergencies or other non-compliances. The EMS will cover the relevant parts of Section 2.1 of appropriate measures.
Compliant?	Not yet..A draft EMS has been produced and will be finalised and implemented in advance of the permit issue.
2.2 Staff Competence	
	1. Your facility must be operated at all times by an adequate number of staff with appropriate training, qualifications and competence. You must keep records of training, qualifications and relevant experience. 2. If you operate a 24-hour process, you must have: - remote or telemetric systems to make sure an alarm would be raised in the event of an incident during unmanned hours - appropriate personnel on call to deal with these incidents You must explain these procedures in your management system. 3. The design, installation and maintenance of infrastructure, plant and equipment must be carried out by competent people, including Construction Quality Assurance where appropriate. 4. You must have appropriately qualified managers for your waste activity who are members of a government approved technical competence scheme and who attend the facility as set out in our attendance guidance. 5. Staff carrying out waste acceptance checks, including sampling and analysis of waste, must be appropriately trained and competent to: - classify and characterise waste properly - identify whether it is suitable for your facility - manage any loads that do not conform to waste acceptance criteria - determine end of waste products
Response/evidence	Training and competency has already been covered in Section 2.3 of the main supporting information document (1), (4) and (5) The facility does not carry out 24 hours/day operation where there are unmanned hours. Remote or telemetric equipment is not in place. Three CCTV dome cameras is in place around the site covering all areas where waste is stored, with two cameras in the external area and one camera placed within the building. The CCTV is monitored during out of hours at an off-site control room, to identify any signs of a disturbance, fire or any other matters which could cause pollution. In the event of an emergency, he monitoring company will alert the emergency services to attend site and the EWL contact. Intruder alarms are in place and if activated out of hours and a notification is automatically sent to the mobile phones of nominated EWL persons. (2). EWL will carry out checks to ensure the installation and maintenance of infrastructure, plant and equipment will be carried out by competent people (3).
Compliant?	Yes
2.3 Accident Management Plan	
	1. As part of your written management system you must have a plan for dealing with any incidents or accidents that could result in pollution, including near misses. 2. The accident management plan must identify and assess the risks the facility poses to human health and the environment. Particular areas to consider may include: waste types

- transferring substances, for example filling (including overfilling) or emptying of vessels and containers
- preventing incompatible substances coming into contact with each other
- failure of plant and equipment, for example storage tanks and pipework, or blocked drains
- failure of containment, for example bund failure or drainage sumps overfilling
- making the wrong connections in drains or other systems
- failure to contain firefighting water
- failure of abatement systems
- hazardous atmospheres in confined spaces
- failure of main services, for example power, steam or cooling water
- checking the composition of effluents before their emission
- vandalism and arson
- operator error
- accessibility of control equipment in emergency situations
- extreme weather conditions, for example flooding or very high winds

3. You must assess the risk of accidents and their possible consequences. You can use our risk assessment guidance to help you to do this. Risk is the combination of the likelihood that a hazard will occur and the severity of the impact resulting from that hazard. Having identified the hazards, you can assess the risks by addressing six questions:

- how likely is it that the accident will happen?
- what may be emitted and how much?
- where will the emission go – what are the pathways and receptors?
- what are the consequences?
- what is the overall significance of the risk?
- what can you do to prevent or reduce the risk?

4. The depth and type of accident risk assessment you carry out will depend on the characteristics of your facility and its location. The main factors to take into account are the:

- scale and nature of the accident hazard presented by the facility and its activities
- risks to areas of population and the environment (the receptors)

5. Through your accident management plan, you must also identify the roles and responsibilities of the staff involved in managing accidents. You must provide them with clear guidance on how to manage each accident scenario, for example as a result of a spillage of a potentially polluting liquid.

6. You must have a suitably trained facility employee available at all times who will act as an emergency coordinator and will take lead responsibility for implementing the accident management plan.

7. You must train your employees so they can perform their duties effectively and safely and know how to respond to an emergency.

8. You must also:

- show how you will communicate with relevant authorities, emergency services and neighbours (as appropriate) before, during and after an accident
- implement emergency procedures, including for safe plant shutdown and site evacuation
- implement post-accident procedures that include carrying out an assessment of the harm an accident may have caused and the remediation actions you will take
- consider the impact of accidents on the function and integrity of plant and equipment
- have contingency plans to relocate or remove waste from the facility, and suspend incoming waste
- test the accident management plan by carrying out emergency drills and exercises

9. After a flooding event you must inspect and assess the integrity of affected plant and equipment, in particular infrastructure that may have been in contact with floodwater or groundwater. Tank inspections should include non-destructive testing methods to verify their integrity.

10. You must take the following measures, where appropriate, to prevent events that may lead to an accident. You must have appropriate procedures set out in your accident management plan.

Preventing accidental emissions

11. You must make sure that you contain the following (where appropriate) and route to the effluent system (where necessary and lawful):

- process waters
- site drainage waters
- emergency firefighting water

- chemically contaminated waters
- spillages

12. You must have planned for how you will manage the impacts of tidal surges and storm water flows. You must consider abnormal operating scenarios and incidents, for example, by providing buffer storage capacity. You should take into account the:

- nature of the pollutants
- potential pathways
- effects of downstream waste water treatment
- sensitivity of the receiving environment

13. If buffer storage capacity is required, you can only discharge from it after you have assessed the water for contamination, in order to identify an appropriate disposal route.

14. You must implement spill contingency procedures to minimise the risk of an accidental spill entering watercourses or sewers or contaminating land.

15. You must take account of additional firefighting water flows or firefighting foams, as set out in our fire prevention guidance. You may need infrastructure like emergency storage lagoons to prevent contaminated firefighting water from reaching a receiving water body.

16. You must consider and, if appropriate, plan for the possibility that you may need to contain or abate accidental emissions from:

- overflows
- tank failures
- tank wall penetrations
- site plant or machinery leaks
- Security measures

You must have security measures (including staff) to prevent unauthorised access to your facility, so preventing:

- damage to equipment
- theft
- illicit dumping and fly-tipping
- arson

17. Depending on your risk assessment, facilities must use an appropriate combination of:

- security guards
- total enclosure (usually with fences)
- controlled entry points
- lighting
- warning signs
- 24 hour surveillance, such as CCTV

Fire prevention

18. If your permit allows you to store or treat combustible waste, you must have a fire prevention plan that meets the requirements of our guidance.

Other accident prevention measures

19. You must maintain plant control in an emergency using one or a combination of:

- alarms
- trips and interlocks
- automatic control systems
- tank level readings such as ultrasonic gauges, high level warnings, process interlocks and process parameters

20. You must:

- make sure that all the measurement and control devices you would need in an emergency are easy to access and operate in an emergency situation

	• maintain plant in a good state through a preventive maintenance programme and a control and testing programme • use techniques such as suitable barriers to prevent moving vehicles damaging equipment • implement procedures to avoid incidents due to poor communication between operating staff – during shift changes and following maintenance or other engineering work Record keeping and procedures 21. You must: • keep an up to date record of all accidents, incidents, near misses, changes to procedures, abnormal events, and the findings of maintenance inspections • carry out investigations into accidents, incidents, near misses and abnormal events and record the steps taken to prevent their reoccurrence • maintain an inventory of substances which are present (or likely to be) and which could have environmental consequences if they escape 22. You must notify the Environment Agency without delay if you detect any of the following events and they are causing, or may cause, significant pollution: • a malfunction • a breakdown or failure • an accident • emission of a substance not controlled by an emissions limit • breach of an emissions limit
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Response/evidence	As discussed in the response to Appropriate Measures Section 2.1, the EMS will be in place before the updated operations commence (1). This will include a comprehensive accident management plan which covers the points set out in this appropriate measure. An environmental risk assessment has been provided within Appendix C of this application (3) and provides an assessment of accident risks. This risk assessment will be used to inform the AMP. A Fire Prevention Plan has been provided within Appendix F (15 and 18). The facility has a 2.4m high perimeter security fence with lockable gates to prevent access. CCTV which is monitored remotely will be in place before the activities commence (17).
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Compliant?	Not yet compliant, a draft AMP has been produced and will be finalised and implemented in advance of the permit issue.
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2.4 Contingency Plan and Procedures	
	1. You must implement a contingency plan so that you: • comply with all of your permit conditions and operating procedures during maintenance or shutdown at your facility, including disruption at other facilities that would affect supplies to your facility or the removal of waste from it • do not exceed limits in your permit and continue to apply appropriate measures for storing and handling waste • stop accepting waste unless you have a clearly defined method of recovery or disposal and enough permitted capacity 2. You must have contingency procedures to make sure that, as far as possible, you know in advance about any planned shutdowns at waste management facilities to which you send waste. 3. You must make your contracted or regular customers are aware of your contingency plan and of the circumstances in which you would stop accepting waste from them. 4. You must consider whether the sites or companies you rely on in your contingency plan: • can take waste at short notice • are authorised to do so in the quantities and types likely to be needed, in addition to carrying out their existing activities 5. If you could exceed your permitted limits, or compromise you storage or handling procedures, you must not discount alternative disposal or recovery options on the basis of extra cost or geographical distance. 6. You must not include unauthorised capacity in your contingency plan. If your contingency plan includes using temporary storage for additional waste at your facility, then you must make sure that your facility is authorised for this storage and you have the appropriate infrastructure in place. Contingency measures for treatment only 7. Your management procedures and contingency plan must: • identify your technology’s known or predictable malfunctions and the procedures, spare parts, tools and expertise needed to deal with them – so you can minimise predictable malfunctions and fix them quickly • include a record of spare parts held, especially critical spares, or state where you can get them from and how long it would take

	• have a defined procedure to identify, review and prioritise items of plant which need a preventative regime • include all equipment or plant whose failure could directly or indirectly affect the environment or human health – if the equipment or plant is process critical then you may need to stop accepting waste or shut down your process • make sure you have the spare parts, tools, and competent staff needed before you start maintenance 8. If you produce an end-of-waste material, your contingency planning must consider storage capacity for end-of-waste products and materials that fail the end-of-waste specification. 9. Your management system must include procedures for auditing your performance against all of these contingency measures and for reporting the audit results to the site manager.
Response/evidence	Prior to the updated activity starting, a written contingency plan will be in place covering (1) to (8). This plan will be maintained within the sites management systems to ensure it remains up to date and appropriate to the site activities. As the facility does not produce an end-of-waste product, (8) does not apply.

Compliant?	Not yet compliant, a contingency plan will be in place prior to the updated activities commencing.
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2.5 Facility Decommissioning	
	1. You must consider the decommissioning of the facility at the design stage and make suitable plans to minimise risks during decommissioning. 2. For existing facilities where potential risks are identified, you must implement a programme of design improvements. These design improvements must make sure that you: • avoid using subsurface tanks and pipework • drain and clean out vessels and pipework before dismantling • use insulation which you can remove easily without dust or hazard • use recyclable materials, taking into account operational or other environmental objectives 3. You must maintain a decommissioning plan to demonstrate that: • plant can be decommissioned without causing pollution • the site will be returned to a satisfactory condition 4. You should identify non-productive or redundant items such as tanks, pipework, retaining walls, bunds, reusable waste containers, ducts, filters and security systems and implement a programme of decommissioning and removal. 5. You should follow our guidance on how land and groundwater should be protected at permitted facilities. You should plan for producing a site condition report, if needed to surrender your permit.

Response/evidence	The site is an existing facility which has been used for industrial and commercial activities for over 30 years. Therefore (1) does not apply. Prior to the updated operations commencing, a site closure plan will be written which sets out (2) to (5) from Section 2.5 of appropriate measures. A site closure plan will be developed which will include plans for the commissioning phase. This document will remain in place throughout the life of the permitted WTS. There are no underground tanks, except for two oil separators. Fuel for on-site plant is stored within a modern double skinned tank, which is Oil Storage Regulations compliant. A site condition report has been produced and placed in Appendix D of the application.
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Compliant?	Not yet compliant, decommissioning plans will be incorporated within the site closure plan that will be produced prior to the updated activities commencing.
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2. Waste pre-acceptance, acceptance and tracking

3.1 Waste pre-acceptance	
	1. You must implement waste pre-acceptance procedures so that you know enough about a waste (including its composition) before it arrives at your facility. You need to do this to assess and confirm that the waste is technically and legally suitable for your facility. If you accept the waste, you must keep records to justify your decision. Your pre-acceptance procedures must follow a risk-based approach, considering: • the source and nature of the waste • potential risks to process safety, occupational safety and the environment (for example from odour and other emissions) • knowledge about the previous waste holder(s)

2. Some facilities receive waste on an ad hoc basis. In those instances pre-acceptance checks can still be carried out before the waste is accepted. For example, through the exchange of information at the weighbridge before acceptance on site.

3. When you receive a customer query, and before the waste arrives at your facility, you must get enough information from the waste producer to satisfy yourself that the waste has been properly assessed and classified as set out in WM3.

4. In the case of household and similar non-household waste (including skip waste) waste is pre-accepted by the terms and conditions of the contract in place (for example skip waste companies excluding fridges and freezers or hazardous wastes). There should also be a visual pre-acceptance check before removal from the producer’s premises.

5. For commercial and industrial waste you must get the following information in writing or electronic form:

- details of the waste producer including their organisation name, address and contact details
- a description of the waste
- the waste classification code (also referred to as a List of Waste (LoW) or European Waste Classification code
- the source of the waste (the producer’s business and the specific process that has created the waste)
- information on the nature and variability of the waste production process
- information about the history of the producer site if it may be relevant to the classification of the waste (for example soils and other construction and demolition arisings from a site contaminated by previous industrial uses)
- the waste’s physical form
- the waste’s composition (based on representative samples if necessary)
- a description of the waste’s odour and whether it is likely to be odorous
- an estimate of the quantity you expect to receive in each load and in a year

For mirror entry LoW codes (as defined in WM3), you must keep the evidence that you have made an assessment of the waste to assign the relevant mirror entry code.

6. You do not need to have sample information if the origin of the waste is reliably understood and it clearly shows that the waste is non-hazardous. However, a visual assessment alone will not be enough to assess whether mirror entry waste is hazardous or not.

7. If the waste is a mirror entry and has not been properly assessed, you must assume it is the hazardous entry as a precautionary measure. This is likely to mean that you cannot accept it at your facility. The pre-acceptance information should be verified by contacting or visiting the producer. Dealing with staff directly involved in waste production can help to fully characterise a waste.

8. Analysis of samples must be carried out by laboratories who are UKAS or MCERTs accredited for the prescribed test.

9. After a waste has been properly assessed and classified, you must technically assess the waste’s suitability for storage and treatment at your facility to make sure you can meet your permit conditions. You must make sure that the waste complies with your facility’s treatment capabilities and you are permitted to take that waste.

10. You must keep pre-acceptance records for at least 3 years, with records preferably held electronically, following receipt of the waste. If an enquiry does not lead to receipt of the waste, you do not need to keep records.

11. You must reassess the information required at pre-acceptance if the:

- waste changes
- process giving rise to the waste changes
- waste received does not conform to the pre-acceptance information

In all cases you must reassess the information required at pre-acceptance on an annual basis.

12. When you agree that you will accept waste from a customer, you should decide and record what parameters you will check at the acceptance stage. The checks could be visual, physical, chemical and odour-based parameters. You must also record the criteria for non-conformance or rejection. The person checking the waste for acceptance can also decide on their own additional parameters.

An updated procedure for waste pre-acceptance will be produced incorporated within the new EMS. An outline of the procedure has been provided within Section 3 of the main supporting information document. The procedure will be designed to address relevant appropriate measures above. A draft EMS has been produced and will be finalised and implemented in advance of the permit issue.

Waste is pre-accepted by the terms and conditions of the EWL customer contract which sets out unacceptable wastes such as fridges and freezers or hazardous wastes. Drivers will also carry out a visual pre-acceptance check before removal of waste from the producer’s premises. Paperwork records of all deliveries will be checked to ensure that the correct details of the supplier, waste description, volume/tonnage and EWC code are included.

Response/evidence

During the routine collection of skips the driver carries out a visual inspection of the waste in the skip. Incoming skips are also inspected at the facility prior to being accepted and again after tipping.

- Measures are taken to ensure the customer is informed to place only permitted waste into the skips. When a customer orders a skip they are verbally informed of wastes which are not permitted. This is also documented on the transfer note.
- Where commercial and industrial wastes are accepted, information which is listed in part 5 of this appropriate measure will be obtained in writing or electronic format.

	• The facility will not accept hazardous wastes. • The origin of all wastes will be known. • Where mirror entry code wastes are accepted, the assessment will be made to assign the mirror entry code. • After a waste has been assessed and classified, an assessment will be made as to whether the waste can be accepted at the facility without the acceptance leading to a permit breach. • Records will be kept for 3 years after waste has been accepted onsite and transferred from the site. • Where the waste changes or is different to the pre-acceptance information, the assessment will be updated. • The waste will be checked prior to acceptance at the facility. Non-conforming loads may be quarantined or rejected and this information will be recorded.
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Compliant?	Not yet compliant, a waste pre-acceptance procedure will be produced prior to the updated activities commencing.
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3.2 Waste acceptance	
	1. You must implement waste acceptance procedures to check that the characteristics of the waste received matches the information provided to you during waste pre-acceptance. This is to confirm the waste is as expected and that you can accept it. If the waste does not conform to the pre-acceptance information, you may still be able to accept the waste, but you must confirm first that your permit allows it and that your facility can handle it appropriately. Otherwise, you must reject the waste. 2. Your procedures should follow a risk-based approach, considering: • the source, nature and age of the waste • potential risks to process safety, occupational safety and the environment (for example, from odour and other emissions) • the potential for self-heating • knowledge about the previous waste holder(s) 3. When deciding whether to accept waste, you must also check that the relevant storage areas and treatment processes in your facility have the physical capacity needed to handle the waste. You must not accept waste if this capacity is not available, or if you would breach your permit by doing so. 4. You must visually check wastes and verify them against pre-acceptance information and transfer documentation before you accept them on site. The extent of the initial visual check is based on the waste type and how it is packaged. 5. You must check and validate all transfer documentation and resolve discrepancies before you accept the waste. If you believe the incoming waste classification or description is incorrect or incomplete, then you must address this with the original waste producer or waste carrier (or both) during waste acceptance. You must record any non-conformance. If you have assessed the waste as acceptable for on-site storage or treatment, you must document this. 6. You must have clear criteria that you use to identify non-conforming wastes and wastes to be rejected. You must also have written procedures for recording, reporting and tracking non-conforming and rejected wastes. These must include: • using quarantine storage • notifying the relevant customer or waste producer • recording a summary of your justification for accepting non-conforming waste in your electronic (or equivalent) system You must take measures to prevent the recurrence of non-conforming and rejected wastes. 7. Where you reject waste which has been classified as hazardous, you must follow the procedure set out in our rejected loads guidance. 8. You must weigh each load of waste on arrival to confirm the quantities against the accompanying paperwork, unless alternative reliable and representative systems are available (for example, based upon density and volume). You must record the weight in your electronic or equivalent systems, so you can monitor available capacity at your facility. Records of incoming waste are not required for waste from householders deposited at Household Waste Recycling Facilities. 9. The person carrying out waste acceptance checks must be trained to effectively identify and manage any non-conformances in the loads received, so you comply with your Duty of Care for waste and your permit conditions. 10. Your procedures must make sure that your staff watch waste being unloaded, so you can quarantine the waste if necessary before it is mixed with other material. 11. Offloading and reception areas must have an impermeable surface with self-contained drainage, to prevent any potentially polluting liquid from escaping off site. This requirement does not apply if your facility's permit allows only inert wastes and does not require impermeable surfacing with self-contained drainage.

Response/evidence	An updated waste acceptance procedure which meets the requirements of appropriate measures Section 3.2 will be included within the site EMS. An outline of the procedure has been set out within Section 3 of the main supporting information document. This procedure will be designed to confirm that the waste arriving at the site is as expected. If the waste does not conform to the pre-acceptance information, the waste may still be accepted if the permit allows it and the facility can handle it appropriately and has sufficient capacity to accept it. Otherwise, the waste will be rejected in accordance with waste rejection procedures and returned to its place of origin. On occasions when waste has already been received and tipped, a quarantine area is available for waste which is discovered to be unacceptable. The quarantine area will be emptied regularly.
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	The waste acceptance procedures will follow a risk based approach listed in (2) of appropriate measures 3.2. Waste will only be accepted at the facility if there is capacity and if the load matches the pre-acceptance information and waste transfer documentation. Any discrepancies with the transfer documents will be resolved before waste is accepted and this action will be documented. The waste acceptance procedure will include systems for identifying non-conforming wastes and wastes rejection. The procedure will document the process for recording, reporting and tracking non-conforming and rejected wastes. These will include: • using quarantine storage • notifying the relevant customer or waste producer • recording a summary of the justification for accepting non-conforming waste in the facility electronic (or equivalent) system EWL will take measures to prevent the recurrence of non-conforming and rejected wastes and these will be set out in the waste acceptance procedure. All incoming and outgoing waste will be measured by volume and weights calculated using a known weight by volume ratio. This ratio will be checked annually using an off-site weighbridge to ensure that the correct weight by volume continues to be applied. • The person carrying out waste acceptance checks will be trained to effectively identify and manage any non-conformances in the loads received, so the facility complies with Duty of Care for waste and the permit conditions. • The procedures will make sure that EWL staff watch waste being unloaded, so non-conforming waste can be quarantined if necessary before it is mixed with other material. Offloading and reception areas are inside the waste reception building and have an impermeable surface. Only inert and excavation wastes are stored and handled in external areas which have impermeable surfacing with drainage which flows to foul sewer, to prevent any potentially polluting liquid from escaping off site.
Compliant?	Not yet compliant, a waste acceptance procedure will be produced prior to the updated activities commencing.
3.3 Quarantine	
	1. Your facility must have a dedicated waste quarantine area or areas which you use to temporarily store waste being rejected, or non-conforming waste whilst it is being assessed. Quarantine areas must have impermeable surface with self-contained drainage if there is a risk of contaminated runoff from the quarantined waste. 2. Where there is a risk of fugitive emissions from quarantined waste you must store it in closed or covered containers or within a building. 3. Quarantine storage must be separate from all other storage and clearly marked as a quarantine area. 4. You should store the waste in quarantine in closed containers or cover it to prevent emissions if appropriate. For example, you should sheet quarantined contaminated soil or store it in a covered skip to prevent rainfall or wind from mobilising pollutants. 5. You must have written procedures for dealing with wastes held in quarantine, including a maximum storage volume. The maximum storage time must take account of the potential for odour generation, pest infestation and storage conditions. If the waste is infested or odorous you must remove it within 24 hours or sooner.
Response/evidence	The facility has a dedicated quarantine area to temporarily store non-conforming wastes. The area has been marked up on the site layout plan within Appendix B of the main application. Quarantined waste will be placed in a skip which is closed or covered to reduce the risk of fugitive emissions, as the quarantine area is located outside the main building. The quarantine area is separate from all other waste storage and reception areas and will be marked clearly. In the event of a fire or where a hot load has been found, the skip can quickly be removed by on site mobile plant. Burning waste can be tipped onto the ground of the cleared quarantine area or the skip that contains the burning waste can be placed within the quarantine area and be tackled within the skip. The quarantine area is engineered with concrete impermeable surfacing with drainage which flows to foul sewer via silt traps and an interceptor to mitigate against the risk of contaminated runoff from the quarantined waste. The management system will include procedures for dealing with quarantined wastes which meets the requirements of appropriate measures.
Compliant?	Will be compliant, an EMS will be updated with a procedure for dealing with quarantined wastes prior to the updated activities commencing.
3.4 Waste Tracking	
	1. You should use an electronic or equivalent system to hold up-to-date information about the available capacity of different parts of your facility, for example reception, quarantine, treatment and storage areas. If you do not have an electronic system you still need to hold the equivalent level of information. You should use a pre-booking system to make sure that you have enough waste storage and process capacity for the incoming acceptable waste. Your electronic or equivalent system must hold all the information generated during: • pre-acceptance • acceptance • non-conformance or rejection • storage

	• repackaging • treatment • removal off site This information must be readily accessible. 2. You must create records and update them to reflect deliveries, on-site treatment and despatches. Your tracking system will also operate as a waste inventory and stock control system, including both wastes and end-of-waste materials produced at your facility. It must include this information as a minimum: • the date the waste arrived on site • the original producer's details (or unique identifier) • a unique reference number • waste pre-acceptance and acceptance information • the package type and size • the intended treatment or disposal route • the nature and quantity of wastes held on site • where the waste is physically located on site • where the waste is in the designated recovery or disposal process • identifying the staff who have taken any decisions about accepting or rejecting waste streams and who have decided on recovery or disposal options • details that link waste to relevant transfer notes • details of any non-conformances and rejections, including consignment notes for waste rejected because it is hazardous 3. The electronic (or equivalent) system must be able to report for each of LoW code: • the total quantity of waste present on site at any one time • a breakdown of the waste quantities you are storing pending on-site treatment or awaiting onward transfer • where a batch of waste is located based on a site plan • the quantity of waste on site compared with the limits in your management system and permit • the length of time the waste has been on site compared with the limits in your management system and permit 4. The electronic (or equivalent) system must also be able to report the total quantity of end-of-waste materials on site at any one time, and where that material is located based on the site plan. 5. You must store back-up copies of records off site. These records must be readily accessible in an emergency. 6. You must keep acceptance records for a minimum of 2 years after you have treated the waste or removed it off site. You may have to keep records for longer if they are required for other purposes, for example hazardous waste consignment notes.
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Response/evidence	Prior to the updated operations commencing, EWL will update the waste tracking system which holds up-to-date information about the available capacity of different parts of your facility, for example reception, quarantine and storage areas. The procedures include a pre-booking system to make sure the facility has enough waste storage and process capacity for the incoming acceptable waste.
	The system will hold the information listed in (1) of Section 3.4 of appropriate measures. This information will also be readily accessible.
	Records will be created and updated to reflect deliveries and despatches. The tracking system will also operate as a waste inventory and stock control system. As a minimum, the system will include the information listed in (2) of Section 3.2 of appropriate measures and will be able to report for each LoW code the information listed in (3) of Section 3.2 of appropriate measures.
	A backup system will be put in place to hold copies of records off-site, which will be accessible in the event of an emergency.
	Records will be kept for a minimum of 2 years after the waste has been removed off site.

Compliant?	Will be compliant, a waste tracking system which meets appropriate measures will be in place prior to operations commencing.
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3. Waste Storage

	1. You must have waste storage and handling procedures. You must store and handle waste in a way that makes sure you prevent and minimise pollution risks by using appropriate measures. 2. You must store waste in locations that minimise the unnecessary handling of waste. 3. Waste handling must be carried out by competent staff using appropriate equipment. You must use mechanical unloading technologies where it is possible, safe and practicable to do so. 4. Where possible, you should locate storage areas away from watercourses and sensitive perimeters, for example those close to public rights of way, housing or schools. You must store all waste within the security protected area of your facility to prevent unauthorised access and vandalism.
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Response/evidence	5. You must clearly document in your management system the maximum storage capacity of your facility and its designated storage areas. You must regularly monitor the quantity of stored waste against the allowed maximum capacities, and not exceed them. You must define capacity in terms of, for example: • cubic metres or tonnage • numbers of skips or other containers • maximum tank or vessel capacities 6. You should clearly mark all waste storage areas and provide signs indicating the type of waste stored there. 7. You must not accumulate wastes. You must treat wastes or remove them from the site as soon as possible. You must prioritise the treatment or off-site transfer of waste based on: • its type • its age on arrival • the date of arrival • the duration of storage on site 8. Except for inert waste, you must follow the first-in-first-out principle, unless you need to prioritise more recently received wastes because they pose a higher risk of pollution. 9. You must minimise refuse derived fuel (RDF) and solid recovered fuel (SRF) storage durations. You must implement an auditable bale identification system so that you can remove bales in date order. 10. You must securely wrap bales of RDF and SRF with high-density polyethylene (HDPE) membrane or equivalent. This is to prevent water entering, access by pests and odour release. You should inspect bales regularly and rewrap any that are damaged. If they are wrapped securely, you can store them outside (unless your permit forbids this). If you store bales outside, your fire prevention plan must manage the risks from solar heating during hot weather. 11. You must thoroughly clean storage bays and containers on a regular basis to prevent the build-up of aging waste, which will be a source of odour and attract vermin. 12. All waste containers must be fit for purpose, that is: • in sound condition • not corroded, if metal • have well-fitting lids • suitable for the contents • with caps, valves and bungs in place and secure • within the manufacturer’s designed lifespan, particularly for plastic containers 13. You must inspect storage areas, containers and infrastructure regularly to make sure there is no loss of containment. You must deal with any issues immediately. You must keep written records of the inspections. You must clean up and log any spillages of waste.
	Prior to the updated operations commencing, EWL will have in place an updated procedure for storage and handling of waste which meets the requirements of Section 4 of appropriate measures. The procedure will ensure waste is stored and handled in a way that makes sure to prevent and minimise pollution risks by using appropriate measures. (1)
	The incoming wastes will be tipped within the most appropriate waste bay or the waste reception area. The layout of the site and the bay/skip areas ensures waste is not handled unnecessarily. (2)
	Site staff are trained to carry out their tasks. A technically competent manager (TCM) will oversee the activities, details of the TCM are provided in Appendix H. Where required, the onsite mobile plant (360 grab and mechanical shovel) will be used for unloading (with the exception of skips which will tip directing inside the building). (3)
	The external and internal waste storage areas are located in areas that are away from sensitive receptors such as watercourses and schools. The facility is kept secure with perimeter fencing and locked gates to prevent unauthorised access. (4) The updated storage procedure will document the maximum storage capacity of the facility and its designated storage areas. The site manager will monitor the quantity of stored waste against the allowed maximum capacities, and not exceed them. The storage capacity will be defined in terms of cubic metres, tonnage or numbers of skips or other containers. (5) All storage areas will be appropriately marked with signage prior to the updated activities commencing. (6) Waste will not be allowed to accumulate (7). Waste will be removed as soon as possible (within 7 days). Prioritisation of waste removal will be based on: • its type • its age on arrival • the date of arrival • the duration of storage on site. EWL will follow a first in first out principal to reduce environmental risks, with the exception of inert wastes which are less likely to cause pollution due to storage durations. (8)

	The facility will not be accepting or handling RDF/SRF wastes or bales (9 and 10). The management system will include procedures for regularly cleaning waste storage bays and containers to prevent the build-up of aging waste, which will be a source of odour and attract vermin. (11) Containers will be used for the storage of recyclable wastes removed from tipped loads, such as wood, card, paper and metals. Where there are small quantities of quarantines wastes, it may be appropriate to store these wastes within a container. Containers will be fit for purpose and meet the requirements of (12) of Section 4 appropriate measures. (12) Procedures will be in place for regular inspections of storage areas, containers and infrastructure to make sure there is no loss of containment. If any issues are identified, the procedures will ensure these are dealt with immediately. The procedure will ensure written records of the inspections are produced. Any spillages of waste will be remedies and a written record will be made. (13)
Compliant?	Will be compliant prior to updated operations commencing, a procedure for waste storage will be in place and will meet the requirements of Section 4 of appropriate measures.
4.1 Waste Segregation	
	1. You should keep different types of waste segregated if contamination would inhibit the recovery of the waste. 2. Where paper, plastic, metal or glass have been collected separately, they must not be mixed with other waste or material. This duty applies where you are required to keep wastes separate and to help with or improve waste recovery.
Response/evidence	The facility has been designed with segregated areas inside the waste treatment building. The facility also makes use of containers (skips), which ensures wastes are not mixed inhibiting recovery. Inert waste and excavation wastes are separately stored in external bays. (1) Under normal operations no mixing of already separated wastes will take place at the facility. Measures in place such as containers and bays for waste types ensures wastes which have been collected separately will be stored separately to ensure recovery. (2)
Compliant?	Yes

5. Waste treatment

	1. Waste treatment must have a clear and defined benefit. You must fully understand, monitor and optimise your waste treatment process to make sure that you treat waste effectively and efficiently. The treated output material must meet your expectations and be suitable for its intended disposal or recovery route. You must identify and characterise emissions from the process and take appropriate measures to control them at source. 2. You must prevent unwanted or unsuitable material from entering subsequent waste treatment processes. You must have accurate and up-to-date written details of your treatment activities and the abatement and control equipment you are using. You should include information about the characteristics of the waste to be treated and the waste treatment processes, including: • simplified process flow sheets that show the origin of the emissions • diagrams of the main plant items where they have environmental relevance, for example, storage, tanks, treatment and abatement plant design • details of physical processes for example separation, compaction, shredding, heating, cooling or washing • an equipment inventory, detailing plant type and design parameters • waste types to be subjected to the process • the control system philosophy and how the control system incorporates environmental monitoring information • process flow diagrams (schematics) • the hourly processing capability of waste treatment equipment • a summary of operating and maintenance procedures The extent of the information about your treatment activities will depend on the nature, scale and complexity of your facility and the range of environmental impacts it may have. It is also based on the type and amount of wastes processed. 3. You must have up-to-date written details of the measures you will take during abnormal operating conditions to make sure you continue to comply with permit conditions. Abnormal operating conditions include: • unexpected releases • start-up • momentary stoppages • shutdown
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Response/evidence	EWL will process waste through the treatment plant in order to remove and separate recyclable materials.. The treatment processes are simple and consists of a rotary screener (trommel) to aid sorting and separation, and manual separation (manual picking). The process will be monitored by the operatives to ensure treatment is effective and efficient. There are no point source emissions from the treatment process. Fugitive emissions and measures to limit the impact of those emissions have been identified within the site ERA, see Appendix C of the application. (1)
	No unwanted or unsuitable material will enter the waste treatment process. Written details of the treatment activities which include the relevant points of appropriate measures 5.2 will be set out in the EMS manual. The waste activities at Mearclough Road will not be complex in nature. (2)
	The waste treatment processes at Mearclough Road are simple and do not require specific measures to manage abnormal operating conditions. (3)
Compliant?	Will be compliant once written details of waste treatment activities has been produced, prior to updated operations commencing.
5.1 Soils and Inert Waste	
1. Soil and aggregate washing is a physico-chemical treatment (not a separation or sorting activity) and you must categorise the outputs as set out in WM3.	
Response/evidence	No soil or aggregate washing will take place at the facility.
Compliant?	N/A
5.2 Waste Treatment Outputs, Including Fines	
1.You must not make assumptions about the nature of the outputs from your waste treatment processes. You must make sure that you appropriately classify the outputs following WM3 If you do not, you may breach your Duty of Care for waste and commit an offence under the Environmental Protection Act 1990.	
This is particularly important for fines arising from shredding and trommelling processes, which generally:	
- require disposal at cost - contain a range of contaminants - are likely to be subject to a mirror entry code in the LoW, for example 19 12 11* versus 19 12 12	
2. Any hazardous waste taken from your facility must be consigned following our guidance Dispose of hazardous waste.	
3. If an output is not waste, for example because end-of-waste criteria have been met, or the material has been produced in accordance with a Quality Protocol (resource framework), then you do not need to store the output within your permitted area. However, non-waste materials are still able to cause pollution, for which you remain liable. You must implement appropriate measures to prevent and minimise risks of pollution from non-waste and waste materials.	
Response/evidence	Hazardous waste is not accepted at the site therefore additional WM3 testing is not required. (1)
	Not applicable no hazardous waste accepted (2)
	No end-of-waste products will be produced at the facility. Therefore point (3) does not apply.
Compliant?	Yes
5.3 Waste Treatment for Landfill	
1. If you are handling or treating waste before you send it to landfill follow our guidance Dispose of waste to landfill ³ .	
Response/evidence	Most wastes treated at the facility will be sent to waste recovery or recycling facilities. Residual waste which has to be sent to landfill will be managed in accordance with EA guidance ³ .
Compliant?	Yes

³ EA guidance - Dispose of waste to landfill <https://www.gov.uk/guidance/dispose-of-waste-to-landfill>

6. Emissions Control

6.1 Enclosure Within Buildings

1. Enclosing activities within buildings can be an appropriate measure for preventing and minimising emissions of pollution, given that an appropriately designed building will reduce a range of types of pollutants, in particular, noise, dust and odour. A partially enclosed building may be an appropriate measure on its own, or together with other appropriate measures, depending on the site-specific circumstances.
2. If your waste treatment activities are likely to cause (or are causing) significant pollution at sensitive receptors which cannot be addressed by alternative measures, then you must carry out that waste treatment activity within an enclosed building.
3. You must also carry out non-treatment activities, such as storing and transferring waste (including loading and unloading) in enclosed buildings if these activities are likely to cause (or are causing) significant pollution at sensitive receptors which cannot be addressed by alternative measures.
- An enclosed building means a construction designed to provide sheltering cover and minimise emissions of noise, particulate matter, odour and litter. It must be enclosed on all sides. Its doorways must be as small as practicable and covered with fast-acting doors which default to the closed position. You must keep its windows closed unless you need to open them for ventilation. Dirty (process contaminated) air must pass through appropriate abatement before being emitted from the building.
4. Material transfer and storage systems and equipment (for example conveyors, hoppers, containers and tanks) can extend outside the enclosed building so long as they are also fully enclosed.
5. You must regularly assess your enclosed building's integrity. You should consider using BS EN ISO 9972:2015 to demonstrate building containment. This method is based on fan pressurisation. You should carry out a smoke test at least annually and where potential faults in building integrity are likely to be causing pollution such as odour.
6. Enclosed buildings must be ventilated to provide a safe working environment for employees. Your building's ventilation system must be properly designed and effective in order for the building to provide adequate containment and prevent fugitive emissions and unacceptable noise. The engineer designing the ventilation system must be appropriately qualified. To validate the size of supply points (louvers), and the volume of dirty air that needs to be extracted, the engineer must understand and consider:
 - the needs of the occupants working in the building
 - heat release
 - the volume of moist gas emissions that will be generated
7. The air inside the enclosed building must be maintained under negative pressure, or you must install a localised extraction system that extracts dirty air from sources of pollution within the building. Sources that could potentially benefit from localised extraction include:
 - shredders and trommels
 - waste loading and unloading areas
 - odorous stockpiles
8. You must regularly assess the integrity of your building for damage that could result in fugitive emissions, including noise breakthrough. You must prevent and minimise damage by implementing a maintenance programme.
9. You must implement measures to control door opening, to make sure that the engineered ventilation system works as effectively as possible. It must direct emissions to the abatement system, rather than letting them escape as fugitive emissions through doors or windows. If you use negative pressure, it must be maintained when doors are opened, and you must monitor the pressure to demonstrate its effectiveness. Additional measures to minimise fugitive emissions may be required in some cases, for example installing an airlock entry system.
10. To reduce emissions of noise and vibration, the building must have an appropriate minimum surface density. You must install acoustic seals on doors and windows, following advice from an acoustic specialist.

All waste treatment occurs within in the waste treatment building which is enclosed by a roller shutter door on the main entrances to the building. These door will remain shut at all times other than for access which will reduce pollution such as dust, odour and noise. This meets the requirements of appropriate measures 6.1 (1), (3).

The treatment activities at the facility will only take place within the building.(2).

There are no fixed material transfer systems such as conveyors or storage hoppers. Whilst external storage of inert waste and segregated recyclables is carried out, all wastes newly accepted as a result of this variation will be handled within the building. (4)

The existing building and doors will be regularly inspected to assess the building's integrity. Inspections will be visual inspections and these will be recorded. Given the waste types and turnaround times odour nuisance is unlikely and therefore inspection to BS EN ISO 9972:2015 and smoke testing is not proposed. (5)

The roller shutter doors of the building will remain closed except to allow for the movement of vehicles and plant. It is envisaged that frequency of this movement will allow for good ventilation of the building. However, EWL will investigate the installation of negative air pressure technology for the building and have the required system in place to meet Section 6.1 of the appropriate measures, prior to accepting dusty wastes. (6) (7)

Response/evidence

	The management system will contain a procedure for the regular assessment of the integrity of the building for damage that could result in fugitive emissions, including noise breakthrough. An inspection and maintenance programme will be written and implemented for the facility . (8) The building will not require the use of negative pressure technology or a ventilation system. As mentioned in the response to (3) above, the doors will only be opened for plant and vehicle movement. EWL will investigate the most appropriate dust abatement and/or air extraction/negative air pressure technology for the building once the new activities commence. (9) A noise impact survey has been carried out and has been placed in Appendix E of the application. The findings indicate that the proposed activities will not cause noise impact to sensitive receptors. EWL will consider the use of acoustic seals on doors and windows should there be an opportunity to carry out site improvements in the future. (10)
Compliant?	Will be compliant prior to the updated operations commencing. EWL will investigate the most appropriate dust abatement and/or air extraction/negative air pressure technology for the building and has the required systems in place to meet Section 6.1 of the appropriate measures, prior to accepting dusty wastes. A building integrity assessment procedure and a maintenance and repair programme for the facility will be written and implemented prior to the new activities commencing.

6.2 Point Source Emissions to Air	
	1. You must use appropriate measures to make sure that you collect, extract and direct all process emissions to an appropriate abatement system for treatment before release. You must identify the main chemical constituents of your facility's point source emissions as part of your inventory of emissions to air. You must include the speciation of volatile organic compounds (VOCs) if you have identified them in the inventory and it is practicable to do so. You must characterise your emissions sufficiently to make sure that your chosen abatement systems are effective. 2. You must make an assessment of the fate and impact of the substances emitted to air, following the Environment Agency's risk assessment guidance. 3. To reduce point source emissions to air (for example dust and odorous compounds) from the treatment of waste, you must use an appropriate combination of abatement techniques. Or you must demonstrate to us that your alternative abatement is equally effective. The appropriate combination of abatement techniques would include one of more of: • adsorption • biofiltration, biotrickling or bioscrubbing • cyclone • fabric filter • water injection (into a shredder) 4. You must assess and design vent and stack locations and heights to make sure dispersion capability is adequate and noise pollution is prevented. You may need to carry out dispersion modelling to establish whether the height of the vent or stack allows emissions to disperse appropriately, preventing any impacts on receptors. 5. Where monitoring is required, including for odour, you must install suitable monitoring points which meet the sampling standard for the relevant pollutants. 6. You must have procedures to make sure that you correctly operate, monitor and maintain abatement equipment. 7. Your monitoring should demonstrate the effectiveness of the abatement, so that you can take preventative or corrective action as necessary. 8. You should implement contingency measures for abatement system down-time and for any abnormal events, for example biofilter media change. These should include suspending operations until the site is back under control, or having standby abatement available. 9. You should design and operate abatement systems to minimise water vapour plumes.
Response/evidence	The facility does not currently have any point source emissions to air.
Compliant?	N/A
6.3 Fugitive Emissions to Air	
	1. You must use appropriate measures to prevent and minimise fugitive emissions to air, including dust, mud and litter, odour and noise and vibration. 2. You must use your waste pre-acceptance, waste acceptance and site inspection checks and procedures to identify and manage wastes that could cause, or are causing, fugitive emissions to air. When you identify any such wastes you must: • take appropriate risk-assessed measures to prevent and control emissions • prioritise their treatment or transfer

Where necessary to prevent fugitive emissions to air from the storage or handling of wastes, you should use a combination of the following measures:

- use fully enclosed material transfer and storage systems and equipment outside buildings, for example conveyors, hoppers, containers, tanks and skips
- store and handle the waste within a suitably enclosed area (for example bays), a building or enclosed building
- keep doors closed except when access is required
- keep enclosed buildings and equipment under adequate negative pressure with an appropriate abated air circulation or extraction system, locating air extraction points close to potential emission sources
- use fast-acting or ‘airlock’ doors that default to closed

3. You must have an appropriate, regular maintenance programme covering all buildings, plant and equipment. It must help prevent emissions or minimise them. Your maintenance programme must include:

- a leak detection and repair programme to promptly identify and mitigate any fugitive emissions of organic compounds from treatment plant and associated infrastructure (for example, pipework, conveyors or tanks)
- regular inspection and cleaning of all waste storage and treatment areas and equipment (including conveyor belts) to avoid large scale contamination activities
- preventing plant and equipment from corroding (for example, conveyors or pipes) – including selecting and using appropriate construction materials, and lining or coating equipment with corrosion inhibitors

4. You should monitor and log weather conditions – temperature, wind speed and direction, and describe any precipitation (for example none, drizzle, heavy rain, snow). You can use this information to identify when dispersion conditions are poor (that is, periods of warm, calm weather with wind blowing towards sensitive receptors). You can also use it to inform decisions to implement additional short-term pollution control contingency measures. If you have a weather station you should position it carefully, for example not placing it in between buildings. There is guidance in the World Meteorological Organization’s Guide to Meteorological Instruments and Methods of Observation.

5. Relying on dispersion and wind direction to minimise pollution at sensitive receptors must be a last resort and you must not use it instead of measures that prevent and reduce pollution at source.

Other measures for dust, mud and litter

6. If your activities are likely to produce dust and particulates, mud or litter that could cause pollution at sensitive receptors, or if such pollution has been substantiated, you must implement and regularly review a dust, mud and litter management plan. You must do this following our guidance. Your dust, mud and litter management plan must explain how you will prevent and minimise emissions of dust, mud and litter from your facility.

7. Measures such as litter fencing and micro-netting should be located as close as possible to areas where you load and unload light-weight loose waste, if this activity is done outdoors. You should not rely on fences and screens at the perimeter of your facility to stop litter escaping.

8. Measures such as mist sprays should be located as close as possible to point source emissions of dust, for example at conveyors, trommels, shredders, and at building entrances – except where this would increase odour from biodegradable waste.

If measures such as using hoses and road sweepers do not prevent mud escaping onto the public highway, you must take further measures and you must consider installing a high pressure wheel wash. Regardless of the measures you use, you must make sure that you minimise water consumption, and that contaminated water does not escape from your facility, unless you can lawfully discharge it.

Other measures for odour

9. If your activities are likely to produce odour pollution at sensitive receptors, or such pollution has been substantiated, you must implement and regularly review an odour management plan following our guidance, which includes H4 Odour management. Your odour management plan must explain how you will prevent and minimise odorous emissions from your facility.

10. You must reject waste that is highly odorous as part of your pre-acceptance and waste acceptance procedures. This is unless you can handle and treat these wastes within an enclosed building with appropriate odour control measures, including extraction via odour abatement. Otherwise, you should talk to the waste supplier to stop it happening again. You should avoid receiving aged waste, for example by refusing to accept waste from other transfer stations that do not have strict inventory controls and documented holding times.

11. You must make sure that odorous waste arrives at and leaves your facility in covered or enclosed vehicles. Mesh covers are not adequate to control odour. You should minimise how long potentially odorous waste is kept at your facility, in particular under anaerobic conditions. Making smaller stockpiles increases natural aeration, reducing the risk of anaerobic biodegradation which can cause odour.

12. You should wash empty vehicles before they leave your facility, to remove any residues which may be or become odorous. You must make sure the run-off from this process is contained and lawfully discharged.

13. You should not allow contaminated liquids to pool for long periods of time, as they can be a source of odour. If you do not have a drainage system inside the building that can collect the leachate or dirty water, then you will need other appropriate measures. You should take action to avoid ponding or pooling. Industrial vacuum cleaners can be used to suck up liquids. You should clean any spillages immediately.

14. You must cover odorous or potentially odorous waters or liquids or keep them in enclosed tanks or containers.

15. Using masking agents (for example dry nano systems, ozone systems and ionisation systems) is a way of attempting to disguise an odour problem. If you understand and process wastes efficiently then you will not need to use masking agents. We do not consider this technology an appropriate measure.

Other measures for noise and vibration

16. If your activities are likely to produce noise or vibration pollution at sensitive receptors, or such pollution has been substantiated, you must implement and regularly review a noise and vibration management plan. Follow our guidance H3 part 2 noise assessment and control. Your noise and vibration management plan must explain how you will prevent and minimise emissions of noise and vibration from your facility.

17. For noise, your noise and vibration management plan must be informed by a noise impact assessment carried out following the methodology of BS 4142:2014+A1:2019 'Methods for rating and assessing industrial and commercial sound'.

18. For vibration, your noise and vibration management plan must be informed by a vibration impact assessment carried out following the methodology of BS 6472-1:2008 'Guide to evaluation of human exposure to vibration in buildings. Vibration sources other than blasting'.

Appropriate measures will be used to reduce the risks to the environment from fugitive emissions to air, including dust, mud and litter, odour and noise and vibration. (1)

The majority of wastes received including the additional waste codes will be tipped, handled, treated and stored within the building, roller shutter doors to the building will be kept shut other than for access. There is a single existing external bays for inert and excavation waste. Plasterboard, wood and scrap metals are also stored externally within skips. Sorted wastes have a low risk of litetr generation of they have been treated to remove litter and residues. Site housekeeping measures are in place which will be used to prevent build-up of dust.

The Environmental Risk Assessment (ERA) in Appendix C of the main application has discussed the risks from emissions including dust, litter, mud, odour, noise and vibration. With the proposed management measures the risks have been assessed as low to very low.

EWL will use a waste pre-acceptance, waste acceptance and site inspection checks and procedures to identify and manage wastes that could cause, or are causing, fugitive emissions to air, such as dust emissions from the shredded metal fines or dusts emissions from mechanically treated wastes. When any such wastes are identified, EWL will:

- take appropriate risk-assessed measures to prevent and control emissions
- prioritise their treatment

Where necessary to prevent fugitive emissions to air from the storage or handling of wastes, EWL will use a combination of the following measures (2):

- use fully enclosed material storage systems inside the building - skips with covering
- store and handle the waste within a suitably enclosed area (internal bay) and the waste treatment building
- keep doors closed except when access is required. (2)

As part of the management systems, a regular maintenance programme covering all buildings, plant and equipment is being developed. This system will include maintenance and inspection of plant and equipment which minimise dust, litter, mud, odour, noise and vibrations e.g. roller shutter doors on the main building The maintenance programme will include the points listed in Section 6.4 (3) of appropriate measures. (3)

The management system will include procedures for the site management to monitor and log weather conditions – temperature, wind speed and direction, and describe any precipitation (for example none, drizzle, heavy rain, snow). It may also be used it to inform decisions to implement additional short-term pollution control contingency measures if required. However, it is unlikely that any contingency measures will be required as the majority of the waste activities will take placed within the building. The facility does not currently have an on-site weather station and would use meteorological data available online. (4)

Methods of reducing pollution prevention at source have been set out within the ERA, Appendix C of the main application, these measures are the primary controls for prevention and reduction of pollution. (5)

Other measures for dust, mud and litter

Measures to prevent dust, mud and litter have been discussed within the ERA. The risks have been assessed as low to very low. There is no need for a mud or litter management plan as the measures for managing the risks from mud and litter are adequate. These measures will be specified within the EMS. A dust management plan has been produced as this has been required by the permit application due to the dusty nature of some wastes. This document has been placed in Appendix I of the application. (6)

The facility will manage potential fugitive emissions from dust, mud and litter by good housekeeping, sweeping surface areas and dampening of areas using the water hose. The site manager will carry out daily inspections of areas of the facility. Any potential risks of dust, litter or mud causing pollution will be remedied and the event will be documented. (7 and 8).

Other measures for odour

The ERA has set out the measures which will be used at the facility to manage potential fugitive emissions from odour. The waste types accepted at the facility are unlikely to create odour nuisance. As such an Odour Management Plan is not in place. (9)

The waste pre-acceptance and acceptance procedures will set out how highly odorous loads should not be accepted into the facility and should be rejected to prevent odour emissions as the facility does not have odour abatement technology. The updated waste pre-acceptance and acceptance procedures will be in place before the updated activities commence, as discussed in the response to Section 3 of Appropriate Measures. (10) It is unlikely that the facility will receive aged waste as the majority of the waste arrives from households and commercial businesses in skips. However, as per the response to point 10, highly odorous wastes will be rejected. During acceptance, each load will be checked for potentially odorous wastes and again during tipping. Malodorous wastes will be loaded back into the vehicle for removal off site.

Skips and containers arriving at the facility will be sheeted to prevent litter escaping. In terms of odour, the facility does not accept odorous wastes and due to the nature of the business (skip business), the incoming wastes tend to originate from households and businesses. Any loads found to contain odorous wastes during the inspection by the skip wagon driver, or during the acceptance checks, will be rejected. (11)

The facility will use skips for waste containment and transfer into and off site. As a skip business, the wastes received mostly of the construction and demolition nature which is less likely to contain odorous wastes. However, should there be a need to wash any skips or containers, the facility will use the on site water hose to carry out this task. The site drainage is directed to the foul sewer which is consented by the sewerage undertaker. (12)

As discussed already, the wastes types and the nature of the skip business is highly unlikely to result in wastes which are odorous or produce runoff which could pool in areas of the facility. If any wastes are found after tipping, which could result in leachate release, these wastes will be placed in a container within the quarantine area for removal off site. The site drainage is designed to prevent stagnated water. In the unlikely event operatives find pooling water within the building, this will be manually swept out towards the external drainage system. There will not be any storage or containment of odorous liquids at the facility and the facility will not be using any de-odourising agents or odour masking agents. (13), (14), (15).

Other Measures for Noise and Vibration

Response/evidence

A noise impact assessment has been carried out to support the permit variation application which was carried out following the methodology of BS 4142:2014+A1:2019 'Methods for rating and assessing industrial and commercial sound' and BS 6472-1:2008 'Guide to evaluation of human exposure to vibration in buildings. Vibration sources other than blasting'. The findings have indicated the risk of impact to sensitive receptors is low. However, EWL have produced a noise and vibration management plan which has been placed in Appendix E of the main application. (16), (17) and (18).

Compliant? Yes

6.4 Point Source Emissions to Water	
	1. You must identify the main chemical constituents of your facility's point source emissions to water and sewer as part of your inventory of emissions. 2. You must assess the fate and impact of the substances emitted to water and sewer following the Environment Agency's risk assessment guidance. 3. Discharges to water or sewer must comply with the conditions of an environmental permit and a trade effluent consent. 4. Relevant sources of waste water include: • runoff from all waste storage and handling areas, including loading and unloading areas • process water • condensate collected from treatment process • waste compactor runoff • vehicle washing • washing of containers and vessels • soil washing effluent • vehicle oil and fuel leaks • spills and leaks • rainwater from bunds around containers and tanks If you need to treat waste water before discharge or disposal, you must use appropriate treatment techniques. An appropriate combination of treatment techniques, for example, could include silt or solids removal and using an oil separator to manage site drainage. 5. You must segregate uncontaminated water streams (for example clean runoff from roofs) from those that require treatment. 6. You must separate contaminated water streams based on pollutant content and treatment required. For example, you may need to collect and treat separately contaminated surface runoff water and process water.

Response/evidence	The surface water discharge to sewer from the facility will be comprised of run-off from the external concreted areas which serve the waste storage bays and the quarantine bay, which will hold quarantined waste within a covered skip. The facility carries out treatment of waste within the building and there are also no processes which produce effluent or process waters. The ERA has already considered the risks to the environment from surface water run-off to the sewer. (1), (2) The discharge will be rainfall dependant and will be regulated by the sewerage undertaker. An application for a trade effluent discharge consent has been made. (3) The ERA has identified sources of waste water, such as: • runoff from external inert waste storage and handling bays • vehicle washing • vehicle oil and fuel leaks • spills and leaks • rainwater from bunds around containers and tanks The facility has silt traps and an oil separator in place to treat water before it leaves the facility. (4) Roof water does enter the foul water sewer system, as shown in the site drainage plan. However, this is a limited volume of water as there are no further buildings located within the site. As stated above, the facility does not produce process waters and the discharge to sewer comprises surface water runoff from areas where vehicle movements and inert/excavation waste activities take place and will be produced by rainfall events. Limited water will be used for dust management. (5), (6)

Compliant?

6.5 Fugitive Emissions to Land and Water	
	1. You must use appropriate measures to control potential fugitive emissions and make sure that they do not cause pollution. See the guidance on emissions to water and leaks from containers.

2. You must design appropriate surfacing and containment or drainage facilities for all operational areas, taking into account:

- collection capacities
- surface thicknesses
- strength and reinforcement
- falls
- materials of construction
- permeability
- resistance to chemical attack
- inspection and maintenance procedures
- relevant standards of construction
- end use, for example by tracked or wheeled vehicles or vehicle weight

3. Your drainage infrastructure must:

- prevent incompatible wastes coming into contact with each other
- make sure that fire cannot spread

4. You must store and treat all waste on an impermeable surface with contained drainage that meets CIRIA 736 or an equivalent approved standard. The impermeable surfaces must have sealed construction joints. These requirements do not apply in designated areas where the waste being stored or handled does not pose any significant risk of contaminating surface water or ground water. You must appropriately isolate these designated areas from other operational areas so that there cannot be any flows between them. This includes in the event of an accident, for example a fire.

5. You must provide bunds for all tanks containing liquids (whether waste or otherwise) that could be harmful to the environment if spilled. Bunds must meet CIRIA 736 or an equivalent approved standard and:

- be impermeable, stable and resistant to the stored materials
- have no outlet (that is, no drains or taps) and drain to a blind collection point
- have pipework routed within bunded areas with no penetration of contained surfaces
- be designed to catch leaks from tanks or fittings
- have an appropriate capacity
- have regular visual inspections – any contents must be pumped out or otherwise removed under manual control after checking for contamination
- be fitted with a high level probe and an alarm (as appropriate) if not frequently inspected
- have tanker connection points within the bund (where possible), and if not possible you must provide adequate containment for spillages or leakage
- have programmed engineering inspections (extending to water testing if structural integrity is in doubt)
- be emptied of rainwater regularly to maintain the containment capacity

6. All above-ground tanks containing liquids (whether waste or otherwise) that could be harmful to the environment if spilled must be kept on an impermeable surface with contained drainage that meets CIRIA 736 or an equivalent approved standard. You must fit the tanks with alarms and cut-out systems to detect and prevent leaks and spills.

7. You must minimise using subsurface equipment and infrastructure, and decommission it where possible. For subsurface structures, you must:

- establish and record the routing of all site drains and subsurface pipework
- identify all subsurface sumps and storage vessels
- engineer systems to minimise leakages from pipes and make sure they can be detected quickly if they do occur
- provide secondary containment or leakage detection for subsurface pipework, sumps and storage vessels – vessels must be fitted with alarms and cut-out systems to detect and prevent spills when filling
- establish an inspection and maintenance programme for all subsurface structures, for example, pressure tests, leak tests, material thickness checks or CCTV

8. You must provide secondary containment that meets CIRIA 736, or an equivalent approved standard, for all drums and other mobile containers which:

- are greater than 200 litres in capacity and are kept outside
- contain liquids (waste or otherwise) that could be harmful to the environment if spilled

9. You must comply with the oil storage regulations. These apply to non-hazardous wastes such as vegetable and cooking oil, as well as to biofuels and mineral oils.

10. You must provide appropriate buffer storage capacity at your facility to store waste waters, taking into account:

- potential abnormal operating scenarios and incidents
- the nature of any polluting substances and their impact on the downstream waste water treatment plant and receiving environment

Response/evidence	You must have appropriate measures to monitor, treat and reuse the water held in the buffer storage before discharging.	
	11. You must take appropriate measures to prevent emissions from washing and cleaning activities, including:	
	- containing and directing spray, liquid effluent and wash-waters to foul sewer or collecting them in a sealed system for offsite disposal – you must not discharge them to surface or storm drains - where possible, using biodegradable and noncorrosive washing and cleaning products - storing all detergents, emulsifiers and other cleaning agents in suitable bunded or containment facilities, within a locked storage area, or in a building away from any surface water drains - preparing cleaning or disinfection solutions in contained areas of the site and never in areas that drain to the surface water system or groundwater	
	12. You must produce and implement a spillage response plan and train staff to follow it and test it.	
	13. Your procedures and associated training must make sure you deal with spillages immediately. You should follow the manufacturer’s health and safety advice for any products or substances involved.	
	14. You must keep spill kits at locations close to areas where a spillage could occur and make sure relevant staff know how to use them. You must make sure kits are replenished after use.	
	15. You must stop spillages from entering drains, channels, gullies, watercourses and unmade ground. You must make available proprietary sorbent materials, sand, booms or drain mats for use when required.	
	16. You must make sure your spillage response plan includes information about how to recover, handle and correctly dispose of waste produced from a spillage.	
	17. You must have a documented inspection and maintenance programme for impermeable surfaces and containment facilities and keep records to demonstrate its implementation.	
	The facility does not receive liquid wastes. The only liquids at the facility which have the potential for fugitive releases are diesel for the on-site plant and small volumes of oils for maintenance activities. A new diesel storage tank is to be installed which meets Oil Storage Regulations. Small containers of oils for maintenance will be stored in a bunded area. These arrangements will reduce the potential for fugitive emissions. (1) The site infrastructure has been designed to prevent polluting substances from seeping into the ground or entering surface waters. The drainage system is designed to capture silts and oils. The updated EMS will include an inspection and maintenance procedure which will ensure all areas of the site infrastructure are regularly inspected, maintained and records kept. (2) The drainage plan has been placed in Appendix B of the main application has been designed to: - prevent incompatible wastes coming into contact with each other and discharging surface water runoff into the foul sewer. - make sure that fire cannot spread as oil separators and silt traps ensure the runoff flows unimpeded and does not contain any potentially flammable liquids. (3) Whilst the waste facility does have impermeable surfacing and a sealed drainage system, the wastes which will be handled will be solid non-hazardous and inert wastes.. Therefore, there is very little risk of highly polluting substances posing a risk to environment. The facility will be regularly inspected and a maintenance programme will ensure any damage is identified and repaired without delay. Diesel fuel and maintenance oils meet the requirements of CIRIA 736 in that the diesel tank is double skinned and meets the Oil Storage Regulations. Storage of maintenance oils will be in the form of 205 lt drums stored within a bunded area meets the CIRIA 736 requirement of 110% of the largest tank in the bund or 25% of the total capacity of all the tanks in the bund. (4) The facility will not handle liquids with the exception of diesel fuel for mobile plant. This will be stored within a new 2,500lt double skinned tank which will be installed prior to the activities commencing and will meet the requirements of appropriate measures 6.5 (5) and (6). Sub-surface infrastructure is limited to the site drainage system which includes silt traps and interceptors. These will be subject to regulate inspections and maintenance including weekly checks and six monthly recharging of interceptors. (7) As discussed above, the facility will have a new double skinned diesel tank which will hold 2,500lt and will meet oil storage regulations. Storage of maintenance oils will be in the form of 205 lt drums stored within a bunded area which meets CIRIA 736 or an equivalent standard. (8) and (9) The facility does not carry out treatment activities which produce effluent or process waters and therefore buffer storage for routine process waste waters is not required. As already detailed Section 6.4 rain fall dependant run-off from external stockpiles of inert and excavation wastes are treated to removed solids and oil prior to discharge to sewer for further treatment. (10) Surface water drainage for the facility is directed to the foul sewer which ensures any emissions from cleaning activities do not cause pollution. The discharge is regulated by the sewerage undertaker in accordance with the TEC. (11) The updated EMS will include a spillage prevention and response plan. All site staff will be trained to respond to spillages and will use the plan. The facility will have in place spill kits to be used during a spillage event. The plan will also include actions on how to recover, handle and correctly dispose of waste produced from a spillage. Drainage mats and booms will be provided within the facility to prevent spillages from entering the drainage system. However, the facility does not receive liquid wastes and does not produce effluents. The only potential polluting liquid will be diesel fuel and small quantities of maintenance oils and greases. (11), (12), (13), (14), (15) and (16) The updated EMS will include a detailed inspection and maintenance procedure for the facility. Records will be kept demonstrating the procedure has been followed. (17)	
Compliant?	Yes	

6.6 Pests	
	1. You must manage waste in a way that prevents pests. For example, if you do not manage flies, rats and birds they can affect operations, be a nuisance to neighbours and pose an environmental and health hazard as a potential vector for pathogens. We have produced internal guidance for our officers on fly management. Contact us if you would like a copy. 2. If you expect pests will cause pollution, hazard or annoyance at sensitive receptors, or if this has been substantiated, you must create, use and regularly review a pest management plan, following our guidance. 3. Your pest management plan must include procedures for: - inspecting for and controlling pests - rejecting loads of infested waste - treating pest infestations promptly, and removing waste if necessary - storing, handling and using approved pest control products – you can get information on using chemicals at work from the Health and Safety Executive
Response/evidence	The facility will not be handling wastes which are likely to attract pests such as rats, flies and birds. EWL will be accepting waste from skip companies which is usually comprised of construction and demolition waste. However, in the event that food waste is identified within loads, this waste will be removed and placed within a sealed container and removed from the site within 3 days. However, a professional pest control service will be contracted to regularly attend to the site as a preventative measure. Wastes stored outside are unlikely to attract pests as they have been treated to remove residues that may attract pests. Residual waste and fragmentiser fluff will be stored within the waste treatment building. Generally, these wastes are not likely to attract pests and a pest management plan will not be required. (1), (2) and (3) However, if at any point complaints about pests are received, these will be investigated and appropriate action taken. At this point, a pest management plan will be produced.
Compliant?	Yes
7. Emissions Monitoring and Limits	
7.1 Emissions to air	
	1. Your facility's emissions inventory must include information about the relevant characteristics of point source emissions to air, such as the: average values and variability of flow and temperature average and peak concentration and load values of relevant substances and their variability presence of other substances that may affect the waste gas treatment system or plant safety, for example, oxygen, nitrogen, water vapour and dust Guidance on monitoring stack emissions is available. 2. You must monitor fugitive emissions of dust and particulates if they are likely to cause pollution at sensitive receptors, or if this has been substantiated. There is guidance on developing monitoring strategies for assessing levels of pollutants in the ambient atmosphere and monitoring particulate matter in ambient air around waste facilities. 3. You must describe your monitoring programme in your dust management plan. Visual monitoring is not effective for assessing the risk of emissions of fine particulates, for example PM10. You should use dust and particulate monitors with trigger alarms instead. You should set alarm trigger levels to alert site staff when short-term particulate concentrations are elevated, so that you can review site practices or increase your mitigation measures. When combined with weather data, dust and particulate monitors can also provide evidence to demonstrate that your facility is not the cause of complaints. You should use a particulate limit of 75 µg/m3 to 100 µg/m3 (over a 5 minute average) for PM10 as an initial trigger for action, and reduce this after the system has been in place for some time.
Response/evidence	The facility does not include point source emissions to air. (1) A Dust Management Plan (DMP) has been produced and placed within Appendix I of this application. This will become part of the updated EMS and the site manager will be responsible to carrying out the checks. The DMP sets out the manner in which fugitive emissions of dust will be monitored regularly and managed to prevent pollution. (2) Potential dust emissions could be produced by the handling of certain wastes such as the shredded metal, fines from the trommel, inert wastes and movement of vehicles. There are not process activities which could result in the release of fine particulates which would require monitoring equipment. (3).
Compliant?	Yes

7.2 Medium Combustion Plant Directive	
	1. If you operate medium combustion plant or specified generators you must monitor your emissions following the Environment Agency guidance on Monitoring stack emissions: low risk MCPs and specified generators and maintain a record of the type and quantity of fuel used in the plant. 2. If you have a generator that uses natural gas, for example in a boiler, you must comply with the specified generator regulations. 3. You must keep periods of start-up and shut-down for medium combustion plant and specified generators to a minimum. You must notify the Environment Agency of newly installed combustion units before start-up. 4. You must notify the Environment Agency at least 14 days in advance of any planned changes to the medium combustion plant or generator which could affect compliance with any emission limits that apply, this includes notifying us of any significant upgrades.
Response/evidence	N/A - the facility does not include medium combustion plant and this will not change as a result of the variation.
Compliant?	N/A
7.3 Emissions to Water and Sewer	
	1. Your facility's emissions inventory must include information about the relevant characteristics of point source emissions to water or sewer, such as: - average values and variability of flow, pH and conductivity - average concentration and load values of relevant substances and their variability, for example, chemical oxygen demand (COD) and total organic carbon (TOC), metals, priority substances or micropollutants - data on bio-eliminability, for example, biochemical oxygen demand (BOD), BOD to COD ratio, biological inhibition potential (for example, inhibition of activated sludge) 2. For relevant emissions to water or sewer identified by the emissions inventory, you must monitor key process parameters (for example, waste water flow, pH, temperature, conductivity or BOD) at appropriate locations. For example, these could either be at the: - inlet or outlet (or both) of the pre-treatment - inlet to the final treatment - point where the emission leaves the facility boundary
Response/evidence	An emissions inventory which meets the above requirements is currently not in place as the site has not been accepting waste for some years. Once updated operations commence, records of monitoring of emissions to sewer will be maintained in line with any requirements set out within the trade effluent discharge consent which has been applied for. (1) The emissions to sewer from the facility will be due to rainwater run off from the external site surfacing. As the facility will not produce process effluents, the requirements to monitor parameters such as flow, pH, BOD and COD etc will not be applicable. Any monitoring requirements for discharges from the site will be regulated by the trade effluent discharge consent. Therefore (2) of this appropriate measure does not apply to the activity.
Compliant?	Will be compliant once the activities commence, and the site runoff can be characterised.
8. Waste minimisation, recovery and disposal	
	1. You must have and implement a residues management plan that: - minimises the generation of residues, that is solid waste arising from the treatment of waste - optimises the reuse, regeneration, recycling or energy recovery of residues, including packaging - makes sure you properly dispose of residues where recovery is technically or economically impractical 2. Where you must dispose of waste, you must carry out a detailed assessment identifying the best environmental options for waste disposal. You must review on a regular basis options for recovering and disposing of waste produced at the facility. You must do this as part of your management system to make sure that you are still using the best environmental options and promoting the recovery of waste where technically and economically viable.
Response/evidence	EWL do not have a separate residues management plan for the facility. However, the residues management will become part of the proposed EMS covered by Section 2.1 of appropriate measures. (1) Where EWL dispose of residual waste, a detailed assessment will be carried out in line with point (2).

	As part of the proposed EMS, regular reviews will be carried out on the options for recovering and disposing of waste produced at the facility with a view to selecting options where possible that manage the wastes higher up the waste hierarchy.
Compliant?	Yes, once the EMS is in place.

