


Project details	Environmental Permit Application EPR/BP3702MC/A001 Larkshall Mill Aggregate Manufacturing Facility
Applicant details	O.C.O Technology Limited Montague Place Quayside Chatham Maritime Chatham Kent ME4 4QU
Report details	Installation EP Application Appendix G – Environmental Risk Assessment Document reference: OCO_2020.04/06_v1
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Submitted to	Permitting and Support Centre Environmental Permitting Team Environment Agency Quadrant 2 99 Parkway Avenue Parkway Business Park Sheffield S9 4WF Email: PSC@environment-agency.gov.uk
Author	Rebecca Hodkinson EHS Consultant
Signature	



Tel: [+44] 07949 178558 www.revaenvironmental.co.uk
Company Registered in England No. 11506654

1 Introduction

O.C.O Technology Ltd (the ‘applicant’) has requested that Reva Environmental Ltd (the ‘agent’) prepares an Environmental Permit (EP) application, for a new installation at Larkshall Mill, East Wretham, Thetford, Norfolk, IP24 1QY.

The centre of the site is as NGR TL 92002 89123.

The proposed facility will treat air pollution control (APC) residues in three parallel production lines to create an aggregate that can be used in block manufacture. APC residues are delivered in powder tankers and transferred into silos, then into a reactor where they are treated with carbon dioxide to lower the pH and reduce the leachability of some heavy metals. The material is then mixed with cement, sand, and water to turn it into pellets. The pellets are stored in covered bays and delivered to end users to make blocks. Processing is all carried out in a building. This process is already permitted at 3 other applicant sites in the UK:

- Leeds Aggregate Manufacturing Facility, EPR/TP3737YG/V005, permitted for 3 production lines;
- Avonmouth Aggregate Manufacturing Facility, EPR/HP3638WW/V004, permitted for 2 production lines (an application for a 3rd line is planned for 2022); and
- Brandon Aggregate Manufacturing Facility, EPR/JP3332FK, permitted for 2 production lines.

The application seeks to allow the following activities:

- 5.3 A(1)(a)(vi) – Disposal or recovery of hazardous waste with a capacity exceeding 10 tonnes per day involving the recycling or reclamation of inorganic materials other than metals or metal compounds (R5). This listed activity will apply three times (AR1, AR2 and AR3) to reflect the three production lines and will allow a combined annual throughput of <100,000 tonnes) for the purposes of producing pellets; and
- 5.6 A(1)(a) – Temporary storage (AR4) of hazardous waste with a total capacity exceeding 50 tonnes (R13). The maximum storage capacity is proposed to be 2,850 tonnes at any one time, and a maximum storage time of 6 months will be enforced, from the date of receipt of the waste.

Three directly associated activities (DAAs) are also proposed as follows:

- Handling and storage of wastes, prior to treatment and recovery activities for hazardous wastes (AR5);
- Storage of raw materials (AR6) for use within production lines AR1 to AR3; and
- Management of surface water for disposal (AR7) via surface water settlement lagoon. The long term plan includes the capture and reuse of clean (roof) water in the process and for dust control.

Each line will be an exact duplicate of the other, will process the same wastes and use the same raw materials to produce the aggregate. They will run in parallel so can be operated independently to provide flexibility of operations. The proposed daily throughput capacity for each line is 140 tonnes, which is 420 tonnes combined across all 3 lines. The site will be developed as a phased construction process and will initially comprise 2 production lines, with a third being added in the next phase.

Question 6 of EA application form Part B2 requires the provision of an environmental risk assessment. This has been generated following the approach used for the other applicant sites (for consistency) and follows a source-pathway-receptor model. It also includes consideration of the habitat sites that have been identified in the pre-application advice provided by the EA (a copy of which is provided in Appendix A of the 2022 application).

The risk assessment is presented in Table ERA3.

1.1 Site Setting

The site is located in a light commercial/industrial and agricultural area, at National Grid Reference TL 92002 89123. The site setting is described on **Drawing OCO-LKSM-EP03** provided in **Appendix D** of this application (2021). Access to the facility is off Thetford Road.

The site setting is summarised in **Table ERA1**.

Table ERA1: Site Setting

Direction	Local Setting
Northern Boundary	<ul style="list-style-type: none"> • Sawpit Plantation lies immediately to the north of the ownership boundary. This includes a track that runs from the middle of the site boundary to the edge of the plantation to the east • Beyond the plantation is Saw Pit Farm and a series of 5 poultry houses which extend to Thetford Road (A1075) • The Farmhouse/Grove Farm sits immediately beyond the A1075 at approximately 250 m from the site boundary • At approximately 650 m to the north, there is an area labelled as a camp site. This nestles between the A1075 and Illington Road • Bridge Farm lies to the north east, approximately 650 m at its closest, and includes a series of 8 poultry houses • A reservoir lies to the north east beyond the Sawpit plantation, next to the poultry houses • The area is largely open fields, delineated by hedgerows, footpaths and tracks
Eastern Boundary	<ul style="list-style-type: none"> • A reservoir lies to the immediate east of the site and is associated with the industrial premises that is to the south of the site • A second, larger, reservoir lies beyond that, at approximately 250 m at its closest • A farm labelled 'Wits End' lies approximately 650 m to the east and includes 8 poultry houses • The area is largely open fields, delineated by hedgerows, footpaths and tracks
Southern Boundary	<ul style="list-style-type: none"> • Other commercial and industrial units lie immediately to the south, labelled as a 'depot' (the closest is a pet food factory) • Beyond this is a series of 6 poultry houses at approximately 300 m • At some 400 m to the south is Sails Plantation which extends to the south and joins Roudham Heath • Several sets of poultry houses are at the south and southeast, the closest of which is approximately 550 m southeast • The rest of the area is largely open fields, delineated by hedgerows, footpaths and tracks
Western Boundary	<ul style="list-style-type: none"> • A number of small buildings lie immediately to the west, off the site haul road from Thetford Road. These are residential and are leased by the applicant to tenants • Beyond the haul road, Larkshall Cricket Ground lies at approximately 50 m • Plantation Farm, Middle Farm and Middle Plantation lie to the west north-west and include 2 sets of poultry houses, the closest of which is at approximately 400 m

	The rest of the area is largely open fields, delineated by hedgerows, footpaths and tracks
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1.2 Sensitive Receptors

1.2.1 General

Key sensitive receptors are considered to be those within 1 km of the site; the potential impact to these from certain sources will depend on the weather conditions.

Figure ERA1 presents the wind rose for the area. This is from a station located at Lakenheath air base which is the closest airfield to the application site with available met office data. The data is for 2016 – 2020 (dry hours).

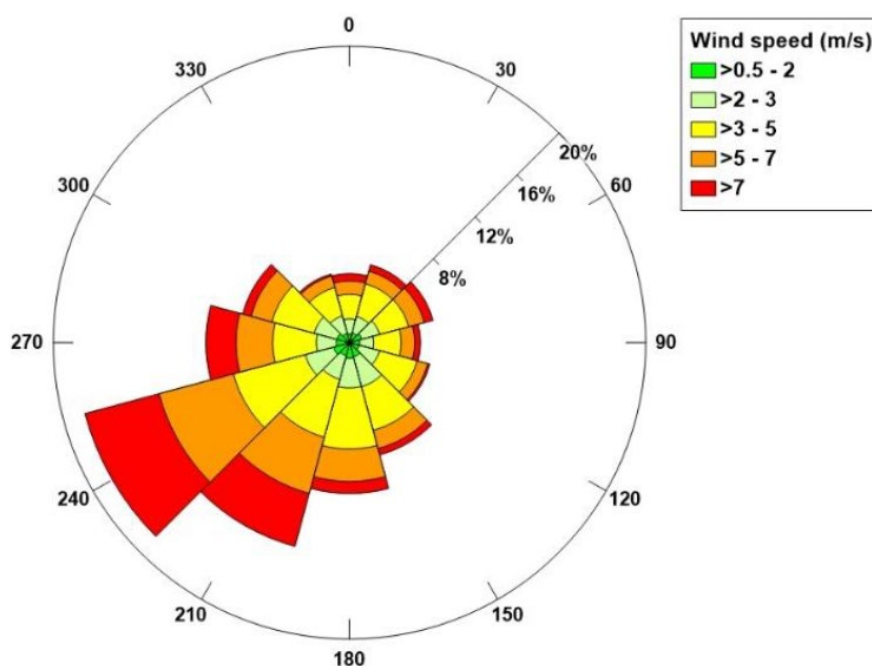


Figure ERA1: Wind Rose

The perceived impact at receptors located down-wind are likely to be more than at those located cross or up-wind for certain sources like dust, litter, odour, noise. Some receptors are more sensitive than others, for example a residential area is likely to be more sensitive than an industrial estate. **Table ERA2** sets out the closest sensitive receptors.

Table ERA2: Sensitive Receptors within 2 km

Receptor	Distance at closest point	Direction	Receptor Type	Relative Risk of Impact
Residential Properties	100 m 250 m	West North	Residential properties – potential all-day presence	High
Workers in other industrial premises	Immediately adjacent	South	Commercial/industrial workplace	Moderate
Pedestrians using public footpaths / tracks	850 m	West	Public routes used by walkers/cyclists etc. – transient use	Low
Users of cricket ground	50 m	West	Recreational area – transient use	Moderate
SSSI/Nature Reserve – East Wretham Heath	400 m	South	Open land – used by transient walkers/public	Low
Military Camp	700 m	North	Campsite – non-continuous use but potential all-day presence when in use	Low

1.2.2 Nature Conservation Sites

The pre-application advice from the EA (2 November 2021) included a nature and heritage conservation screening report. The following features were identified as being within the applicable screening distances and have therefore been considered in this ERA:

- **Norfolk Valley Fens Special Area of Conservation (SAC).** This is an area of approximately 615 hectares which comprises standing/running water; bogs, marshes, water fringed vegetation and fens; heath, scrub; dry grassland and steppes; humid grassland and mesophile grassland; and broad-leaved deciduous woodland. The primary reason for the designation of the site is its alkaline fens which support a rich flora including common butterwort, marsh helleborine, and narrow-leaved marsh orchid. There are other qualifying flora features, and the area also supports the presence of narrow-mouthed whorl snail and Desmoulin’s whorl snail (the latter is a strong population of a nationally scarce species).
- **Breckland SAC and Special Protection Area (SPA).**
 - The SAC designation applies to an area of over 7,500 hectares. Component SSSIs are some of those mentioned below, including Bridgham & Brettenham Heaths. The area comprises pingos (patterned ground features and ice depressions formed during the last ice age) which are of high geological and biological importance*. This presents a dry heath and grassland communities, with occasional woods (Alder – the priority habitat) that rely on high water levels and surface flooding. The area supports the great crested newt.
 - The SPA designation applies to an area of some 39,000 hectares. Component SSSIs include Breckland Forest and East Wretham Forest. The area is described as sandy, and the low rainfall and free-draining soils has led to the development of dry heath and grassland communities as referenced above in relation to the SAC designation. The area supports heathland breeding birds, namely woodlark, nightjar and stone curlews (the latter accounts for some 60% of the total population in Great Britain).
- **Bridgham & Brettenham Heaths Site of Special Scientific Interest (SSSI).** This is an area of over 430 hectares. Brettenham Heath is also a National Nature Reserve. It is a dry, acidic heath with

areas of scrub and woodland which supports heather and wavy hair-grass. It also supports breeding birds including common curlews and nightjars.

- Breckland Forest SSSI. Breckland Forest is designated due to it supporting breeding woodlarks and nightjars in internationally important numbers, and several nationally rare vascular plants and invertebrates on the IUCN Red List of Threatened Species. It covers an area of 18,000 hectares.
- East Wretham Heath SSSI. This is an area of 141 hectares and is the oldest established Breckland nature reserve. Its principal scientific interest lies in the two fluctuating meres, Ringmere and Langmere, and in the areas of Breckland grassland. Additional interest is provided by permanent pools, areas of mature secondary semi-natural woodland, scrub and an artificial arable weed reserve. Crossbills and red squirrels are amongst the species that use this area whilst the older woodland areas support a small breeding population of hawfinches.
- Local Wildlife Sites (LWSs) as follows:
 - Lane Meadow;
 - South of Bragmere Pits. This is an area of woodland within Breckland Forest; and
 - Pasture in Wretham.

Given that the areas support wildlife and have parts that can be accessed by the public, it is considered that these sites would be sensitive to dust, litter, odour, noise and vibration, fire and pests/scavengers.

These sites have been taken into consideration in the risk assessment, set out in **Table ERA3** below.

**The Environmental Statement completed for the planning has considered the impact of the proposed rainwater harvesting on the pingos, as this was raised during stakeholder engagement. The ES considers whether rainwater harvesting would significantly impact the water table and concludes that this is not the case.*

Table ERA3: Risk Assessment

Hazard	Receptor	Harm	Pathway	Likelihood of Exposure	Consequence	Magnitude of Risk	Justification of Magnitude	Control Measures	Residual Risk
Releases of particulate matter (dusts)	Local human population/presence, livestock and wildlife. - the closest residential receptors are some 100 m to the west of the site; the closest commercial receptors are the depots to the south of the wider site; ecological sites – the closest is East Wretham Heath at 400 m to the south of the site	Nuisance - dust on cars, clothing etc.	Transportation through air then inhalation or deposition	Medium	Low	Medium	Permitted waste types are hazardous and are fine dusts (as are so if inhaled, the consequence could be high.	Waste and binder delivered in sealed powder tankers; filler in sheeted tippers. Transfer into silos managed through driver induction & training in discharge of waste materials, use of appropriate couplings which are subject to regular inspection and maintenance. Silos are self-testing before each delivery ensuring capacity is available to receive the load and that discharge pressures are within correct operating limits. Automatic shut-off if any safety system is breached. Waste silos subject to regular inspection and maintenance and incorporate dust filters. Movement of untreated waste from silos via sealed systems into the enclosed mixing chamber. At this stage water is added as well	Very Low
		Harm to human health - respiratory irritation and illness; harm to ecological features through toxic contamination or smothering		Low	High	Medium	Raw materials are similar (e.g. cement), with sand being delivered in sheeted vehicles and directly into dedicated storage areas. The likelihood of dust being generated is low and any potential for dust generation is appropriately mitigated through a dust suppression system and operational control procedures.		Low

Hazard	Receptor	Harm	Pathway	Likelihood of Exposure	Consequence	Magnitude of Risk	Justification of Magnitude	Control Measures	Residual Risk
								as the CO2 allowing the subsequent movement of material to be via conveyors but within the confines of the process building. The building has roller shutter doors, these are kept open as needed, to prevent dust build up in the building. Incoming filler material is delivered in sheeted tipper trucks and is delivered directly into dedicated, covered, storage areas. The site is kept clean (mechanical road sweeper) and dampened down if necessary; the Team Leader is responsible for undertaking daily inspection of the site; this will include identification of any potential or actual dust emissions, and actions will be taken if required.	
Fire or explosion	Local human population and local	Respiratory irritation,	Air transport of smoke.	Low	High	Medium	The impact of a fire on the immediate local	Waste is received at the site and placed in silos. The silos	Low

Hazard	Receptor	Harm	Pathway	Likelihood of Exposure	Consequence	Magnitude of Risk	Justification of Magnitude	Control Measures	Residual Risk
from release of hydrogen gas from storage of IBA	environment - the closest residential receptors are some 100 m to the west of the site; the closest commercial receptors are the depots to the south of the wider site; ecological sites – the closest is East Wretham Heath at 400 m to the south of the site	illness and nuisance to local population. Injury to staff, fire fighters or arsonists / vandals. Pollution of water or land from run-off of contaminated fire water. Harm to ecological features through toxic contamination or smothering	Spillages and contaminated firewater by direct run-off from site and via surface water drains and ditches				area can be significant, and the pollution requiring short to medium term remediation. Hydrogen gas can be released from incinerator bottom ash (IBA) during the ageing process.	are not hermetically sealed as the filters allow venting of the silo to atmosphere; this means the hydrogen gas cannot accumulate in the silo creating an explosive atmosphere. Process is continuous and 24/7 so no waste material is stored for a prolonged period of time in the silo, therefore will not have the opportunity to age and generate hydrogen. Pre-acceptance procedures require testing of waste materials and this testing includes one for hydrogen gas evolution. If this test identifies that hydrogen evolution is likely within a 2 week typical maximum storage period, the silo will be made intrinsically safe prior to accepting the material.	

Hazard	Receptor	Harm	Pathway	Likelihood of Exposure	Consequence	Magnitude of Risk	Justification of Magnitude	Control Measures	Residual Risk
Litter	Local human population/presence, livestock and wildlife. There are several surface water features (reservoirs) within 250 m of the site boundary, the closest residential receptors are some 100 m to the west of the site; the closest commercial receptors are the depots to the south of the wider site; ecological sites – the closest is East Wretham Heath at 400 m to the south of the site	Nuisance, loss of amenity and harm to wildlife (disturbance)	Air transport then deposition	Low	Medium	Medium	It is acknowledged that local residents and habitat receptors are often sensitive to litter emissions however permitted wastes are not litter-generating. Waste that could generate litter will be limited to office and welfare facilities so small scale and managed in standard bins.	It is not anticipated that litter will be an issue at the site. The Team Leader is responsible for undertaking daily inspection of the site; this will include identification of any potential or actual litter emissions, and actions will be taken if required.	Low
Waste and mud on local roads	Local human population/presence - the closest residential receptors are some 100 m to the west of the site;	Nuisance, loss of amenity, road traffic accidents	Vehicles entering and leaving the site	Low	Medium	Medium	Road safety, local residents often sensitive to mud on roads.	The team lead daily inspection will identify if there are any areas of build-up of mud on internal and local roads and any issues will be cleared as	Low

Hazard	Receptor	Harm	Pathway	Likelihood of Exposure	Consequence	Magnitude of Risk	Justification of Magnitude	Control Measures	Residual Risk
	the closest commercial receptors are the depots to the south of the wider site. Site access is off Thetford Road to the west							soon as practicable; the facility and site roads are constructed of concrete and suitable road sweeping equipment will be used to ensure site roads kept clear and tidy; all vehicles entering and leaving the site are covered or fully enclosed; any complaints will be recorded in the site diary; an investigation will be undertaken and findings acted upon. If EA perceives that mud is an issue, then a management plan will be implemented.	
Odour	Local human population/presence - the closest residential receptors are some 100 m to the west of the site; the closest commercial receptors are the depots to the south	Nuisance, loss of amenity	Air transport then inhalation	Medium	Medium	Medium	Local residents often sensitive to odour, permitted waste types are not generally odorous; nor are the raw materials (filler, binder, CO2), however reactions within the process	Wastes and raw materials do not have an odour. Waste is discharged into the delivery tankers directly from the permitted EfW facilities therefore is a controlled source and will not be contaminated with any non-permitted waste. Every delivery is sampled	Low

Hazard	Receptor	Harm	Pathway	Likelihood of Exposure	Consequence	Magnitude of Risk	Justification of Magnitude	Control Measures	Residual Risk
	of the wider site; ecological sites – the closest is East Wretham Heath at 400 m to the south of the site						have the potential to generate ammonia (as a result of the waste source process overdosing ammonia for NOx abatement).	prior to discharge (for compliance with specification). Filters in the silo inlet pipework to ensure that no foreign bodies are allowed into the process. The building has roller shutter doors and these will be kept open as needed, to prevent ammonia build up in the building. Operatives undertaking confined space cleaning are potentially exposed but are required to wear full face respirators for this activity.	
Noise and vibration	Local human population/presence, livestock and wildlife - the closest residential receptors are some 100 m to the west of the site; the closest commercial receptors are the	Nuisance, loss of amenity; harm to ecological features through disturbance	Noise through the air and vibration through the ground	Medium	High	High	Local residents often sensitive to noise and vibration, closest residents are 100 m from the site but the site is within an existing 24/7 operational industrial area.	Operations are within a fully enclosed building. Any complaints will be recorded, and an investigation will be undertaken and findings acted upon. White noise reversing beepers utilised on plant. Audible high-level alarms on process plant are	Medium

Hazard	Receptor	Harm	Pathway	Likelihood of Exposure	Consequence	Magnitude of Risk	Justification of Magnitude	Control Measures	Residual Risk
	depots to the south of the wider site; ecological sites – the closest is East Wretham Heath at 400 m to the south of the site							within the confines of the building. Noise impacts are currently being assessed as part of the planning application.	
Scavenging animals and scavenging birds	Local human population/presence, livestock and wildlife. - the closest residential receptors are some 100 m to the west of the site; the closest commercial receptors are the depots to the south of the wider site; ecological sites – the closest is East Wretham Heath at 400 m to the south of the site	Harm to human health - from waste carried off site and faeces. Nuisance and loss of amenity. Harm to ecological features through predation	Air and over land	Low	Medium	Medium	Permitted wastes and raw materials will not attract scavenging animals and birds	Pests and vermin are not expected to be an issue at the site; the waste is not biodegradable so should not attract scavenging animals and birds; regular monitoring of the site will be undertaken; any complaints will be recorded within the site diary and an investigation will be undertaken and findings acted upon.	Low
Pests (e.g. flies)	Local human population/presence, livestock and wildlife. - the closest	Harm to human health, nuisance and loss of amenity;	Air and over land	Low	Medium	Medium	Permitted wastes and raw materials are non-biodegradable	Pests and vermin are not expected to be an issue at the site; the waste is not biodegradable so will not	Low

Hazard	Receptor	Harm	Pathway	Likelihood of Exposure	Consequence	Magnitude of Risk	Justification of Magnitude	Control Measures	Residual Risk
	residential receptors are some 100 m to the west of the site; the closest commercial receptors are the depots to the south of the wider site; ecological sites – the closest is East Wretham Heath at 400 m to the south of the site	Harm to ecological features through predation					and will not attract pests	attract scavenging animals and birds; regular monitoring of the site will be undertaken; any complaints will be recorded within the Site diary and an investigation will be undertaken and findings acted upon	
Spillage of liquids, leachate from waste, contaminated rainwater run-off from waste e.g. containing suspended solids.	All surface waters close to and downstream of site, land, and groundwater.	Acute effects: oxygen depletion, fish kill and algal blooms.	Direct run-off from site across ground surface, via surface water drains; transport through soil / groundwater	Low	Medium	Medium	Permitted waste types do not include sludges or liquids, nor are stored in the open air where rainfall can generate a leachate.	All surface water (both from the waste silo pad and yard areas) will be captured by the surface water drainage network and directed to the settlement lagoon. Hardstanding will be inspected on a regular basis and remediation undertaken if required. In the event of any spillages on site, a cut off valve in the drainage system will be used to isolate the	Low

Hazard	Receptor	Harm	Pathway	Likelihood of Exposure	Consequence	Magnitude of Risk	Justification of Magnitude	Control Measures	Residual Risk
								settlement lagoon so that there is no discharge off site until testing has been carried out on the contents of the drains. Water can be pumped from the sump into the underground storage tanks if required.	
Flooding of site	Local human population/presence, livestock and wildlife. There are several surface water features (reservoirs) within 250 m of the site boundary, the closest residential receptors are some 100 m to the west of the site; the closest commercial receptors are the depots to the south of the wider site; ecological sites – the closest is East Wretham Heath at	Waste and/or raw materials washed off site may contaminate downstream receptors	Flood waters	Low	Medium	Medium	Permitted waste types are hazardous, the site is at very low risk of flooding from rivers/the sea (ref. gov.uk)	Waste is fully contained at all stages, silos are on a plinth, raised off the ground. A flood risk assessment has not been produced for the facility as part of the planning application process as it was screened out.	Low

Hazard	Receptor	Harm	Pathway	Likelihood of Exposure	Consequence	Magnitude of Risk	Justification of Magnitude	Control Measures	Residual Risk
	400 m to the south of the site								
Arson and / or vandalism causing the release of polluting materials to air (smoke or fumes), water or land	Local human population/presence, livestock and wildlife. - the closest residential receptors are some 100 m to the west of the site; the closest commercial receptors are the depots to the south of the wider site; ecological sites – the closest is East Wretham Heath at 400 m to the south of the site	Respiratory irritation, illness and nuisance to local population. Injury to staff, fire fighters or arsonists/vandals. Pollution of water or land.	Air transport of smoke. Spillages and contaminated firewater by direct run-off from site and via surface water drains and ditches.	Medium	High	High	The impact of a fire on the immediate local area can be significant, and the pollution requiring short to medium term remediation. Permitted waste types do not include flammable materials	The site has existing secure fencing and gates approximately 2.4 m high; lockable ladder guards on silos to prevent access, the site will be made secure out of hours; there is a fire alarm; the site will have CCTV. The site will have CCTV covering general operating areas; the location of the site is in an industrial area; the distance from residential receptors and therefore human presence is great. Pollution control measures including impermeable hardstanding and surface water management infrastructure (which includes 2 underground tanks that can be used in an emergency scenario) provides protection in terms of	Medium

Hazard	Receptor	Harm	Pathway	Likelihood of Exposure	Consequence	Magnitude of Risk	Justification of Magnitude	Control Measures	Residual Risk
								providing storage capacity for fire water. Water will be tested prior to discharge following fire to identify if it can be discharged.	
Accidental fire causing the release of polluting materials to air (smoke or fumes), water or land.	Local human population/presence, livestock and wildlife. - the closest residential receptors are some 100 m to the west of the site; the closest commercial receptors are the depots to the south of the wider site; ecological sites – the closest is East Wretham Heath at 400 m to the south of the site	Respiratory irritation, illness and nuisance to local population. Injury to staff or fire fighters. Pollution of water or land.	Air transport of smoke. Spillages and contaminated firewater by direct run-off from site and via surface water drains and ditches.	Medium	High	High	Permitted waste types unlikely to include flammable materials	The permitted waste types (and raw materials) are not flammable. Regular inspections and maintenance of key process plant and equipment (following planned preventative maintenance programme). Thermal cut outs on applicable equipment (e.g. electrical drives and inverters). Lightning protection systems in place on building, cement silo and waste silos. All reasonable precautions will be taken to prevent the outbreak of fire. Site staff will extinguish the fire where possible, if required the fire brigade will be contacted.	Medium

Hazard	Receptor	Harm	Pathway	Likelihood of Exposure	Consequence	Magnitude of Risk	Justification of Magnitude	Control Measures	Residual Risk
								Any hot works are completed under the permit to work system including a 30 minutes 'fire watch' following any hot works. Pollution control measures including impermeable hardstanding and surface water management infrastructure provide protection (which includes 2 underground tanks that can be used in an emergency scenario) in terms of providing storage capacity for fire water; a cut off valve can be closed to prevent discharge to the settlement lagoon. Water will be tested prior to discharge following fire to identify if it can be discharged.	

2 Conclusion

Further details on the control measures are provided in the BAT Assessment completed for the variation application (Appendix H of the 2021 application, ref. OCO_2020.04/08). These include details on:

- Waste pre-acceptance
- Waste acceptance
- Waste storage and handling
- Use of raw materials
- Treatment
- Emissions

On the basis of this and the assessment above, which follows the H1 approach for risk assessment, it is considered that the proposed control measures proposed for the new activities are appropriate.*

The ERA is a live document and will be subject to regular review throughout the life of the permitted operations. It will also be amended, if required, following any significant change to operations, an incident resulting in an environmental impact, and/or any substantiated complaints.

** Noise impacts are currently being assessed as part of the planning application.*