

Response to Request for Further Information: Application reference: EPR/VP3023UX/A001 Operator: Areera Ltd: Facility: External Yard, Multipark Stanton, Stanton, Bury Saint Edmunds IP31 2BG: 10th September 2026

This document forms a response to the Request for Further Information received on 03rd September 2026 with regard to the following application for an Installation Permit:

Environmental Permitting (England and Wales) Regulations 2016

Application reference: EPR/VP3023UX/A001

Operator: Areera Ltd

Facility: External Yard, Multipark Stanton, Stanton, Bury Saint Edmunds IP31 2BG.

For ease, responses are included below your questions, and are highlighted in **blue** font.

Thank you for your application received on 29/08/2026. The following the conversation on the 03/09/2026.

Unfortunately, the application payment you sent is incorrect. The correct application charge is £14,032.72. This leaves a balance of **£4,472.74** to pay.

You have paid the application charge for a hazardous waste transfer station activity (charge reference 1.16.5). The application proposes to store hazardous waste above 50 tonnes so would require the Section 5.6 temporary or underground storage of hazardous waste charge (reference 1.16.4). Refer to our charging guidance [The Environment Agency Environmental Permitting and Abstraction Licenceing England Charging Scheme 2022 Amendments up to 15 May 2026](#) and details about tonnage here: [The Environmental Permitting \(England and Wales\) Regulations 2016](#).

I have attached a fee breakdown for your reference.

Response: Additional payment of £4,472.74 is to be made on Friday 11th September 2026. Remittance advice to follow.

We need to ask you for some missing information before we can do any more work on your application. Please provide us with more information to the following questions.

1. **Update Part F1 to show the correct fee.**

Response: Application Form Part F now updated, as attached to email of 10.09.2026

2. **Provide evidence of technical competence.**

You stated in Part B2, section 3 that evidence of technical competence has been provided, but it was not included with the application. Submit evidence of registration with an approved technical competence scheme for the Section 5.6 temporary storage of hazardous waste activity, including evidence for each proposed technically competent manager. Refer to section 3b 'Technical ability' [Form guidance EPB: Application for an environmental permit – Part B2 general – New bespoke permit](#).

Response: See Appendix 1, below, for evidence of technical competence.

3. **Provide an additional site plan showing the main geographic features surrounding the site.**

We need this information to understand the site's location, surrounding environment and potential receptors.

Response: See Appendix 2 and Appendix 2a, below, for site plans showing the location and geographical surroundings of the site.

4. **Confirm your approach to baseline soil and groundwater data. Either:**

- i. **submit representative baseline soil and groundwater sampling data for the permitted area, including the sampling locations, methods and analytical results;**

or

- ii. **confirm that you wish to proceed without baseline data and accept the risk that, at surrender, you may be unable to demonstrate that any contamination was present before the permitted activities began.**

The Site Condition Report must record the condition of the land and groundwater at permit issue so that you can demonstrate at surrender that the site has not deteriorated and is in a satisfactory state. If you do not establish baseline conditions, you may need to collect reference data at surrender and remediate contamination where you cannot demonstrate that it was not caused by the permitted activities. Refer to H5 Site condition report guidance [Environmental permitting: H5 Site condition report - GOV.UK](#).

Response: It is confirmed that the management of Areera Ltd wishes to proceed without baseline data and accept the risk that, at permit surrender, Areera Ltd may be unable to demonstrate that any contamination was present before the permitted activities began.

5. Remove the claim that the site is a low impact installation.

You have stated that the site is a low impact installation. However, your application includes a Section 5.6 activity for the temporary storage of hazardous waste. Section 5.6 activities cannot use the low impact installation approach.

Update your application form Part B2 and supporting documents to provide the information required for a full bespoke installation. Remove the claim that the site is a low impact installation.

The Part B2 application guidance excludes Section 5.6 temporary or underground storage of hazardous waste activities from the low impact installation approach. Refer to 'Appendix 1 – Low impact installation checklist' [Form guidance EPB: Application for an environmental permit – Part B2 general – New bespoke permit](#)

Response: The application form B2 has now been updated to remove the claim that the site is a low impact installation and the revised version of the application form is (to be) included as an attachment to the emailed response (10th September 2026).

6. Provide an updated BAT assessment that identifies each BAT conclusion relevant to the Section 5.6 activity and explains how the site will meet it.

Part B3 requires your operating techniques to explain how you will meet the standards in the relevant BAT Conclusions and technical guidance. The site is an installation and must use BAT. Refer to [EUR-Lex - 02018D1147-20180817 - EN - EUR-Lex](#).

Response: The BAT assessment against BAT Conclusions from [EUR-Lex - 02018D1147-20180817 - EN - EUR-Lex](#) is included as Appendix 3, below, and in the updated Document 9 (as a separate attachment to the email of 10.09.2026).

7. Update Part B3, Table 3a, to include the Waste Treatment BAT Conclusions.

Response: Application Form Part B3, Table 3a has now been updated as attached to the email of 10.09.2026.

Please reply directly to this email with your information and copy in Simone.Cumberbatch@environment-agency.gov.uk.

Postal address:
Integrated Permitting Services
Quadrant 2
[99 Parkway Avenue](#)
Parkway Business Park
Sheffield
S9 4WF

You must send us the information and or payment by **17/09/2026**

Pay online by credit or debit card

Pay online at this link www.gov.uk/payments/permitting-applications-installations/permitting-application-payment-installations

You need to create your own reference number. Your reference number must follow this format: PSCAPPINSTXXXXXXYYY. It should include the first five letters of the company name (replacing the X's in the above reference number) and a unique numerical identifier (replacing the Y's in the above reference number). Email us the reference number and the payment date so we can track your payment.

If we do not receive this by this deadline we will return your application.

If we receive what is missing by the deadline, we will continue to check your application. We'll check to see if there's enough information for the application to be 'duly made'. Duly made means that we have all the information we need to begin determination. Determination is where we assess your application and decide if we can allow what you've asked for.

We'll let you know by email whether your application can be duly made. If it can't be duly made, we'll return your application to you.

If we do have to return your application we'll send you a partial refund of your application payment. We'll retain 20% of the correct application charge to cover our costs in reviewing your application. This maximum amount we'll retain is capped at £1,673.78. Further information on charging can be found at: <https://www.gov.uk/government/publications/environmental-permits-and-abstraction-licences-tables-of-charges>

Note: Our email system has a file size limit of 25MB, if your returns exceed this limit you will have to arrange an online file transfer. Please ensure the file transfer link does not have a time limit on it.

If you have any questions please phone me on 07391409419 or email Simone.Cumberbatch@environment-agency.gov.uk.

Yours sincerely,
Simone Cumberbatch

Appendix 1: Evidence of Technical Competence

Technical Competence will be shared between three WAMITAB COTC holders as follows:

- 1) Craig Thompson
- 2) Lee Shaw-Binns
- 3) Joanne Turner

Copies of their COTC certificates and Certificates of Continuing Competency are included below:



Qualification Title:

**WAMITAB Level 4 High Risk Operator Competence for
Managing Transfer of Hazardous Waste**

Qualification Accreditation Number:

601/8504/1

This Certificate is awarded to

Craig Michael Thompson

Verification date: 22/10/2021

Authorised:

Katie Cockburn
Director of Qualifications and Standards

Learner ID: 20231

Certificate No.: 5187213

Date of Issue: 27/10/2021



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register.ofqual.gov.uk



The qualifications regulators logos on this certificate indicate that the qualification is accredited only for England, Wales and Northern Ireland. Qualifications Wales regulates this qualification where it is awarded to learners assessed wholly or mainly in Wales.



00154770



CIWM

Continuing Competence Certificate

This certificate confirms that

Craig Thompson

Has met the relevant requirements of the Continuing Competence scheme for the following award(s) which will remain current for two years from 03/11/2025

TSH

Transfer - Hazardous Waste

TMH

Treatment - Hazardous Waste

Expiry Date:
03/11/2027

Verification date: 01/11/2025

Authorised:

Responsible Officer

Learner ID: 20231

Certificate No.: 5292982

Date of Issue: 03/11/2025

CIWM Chief Executive Officer



The Chartered Institution
of Wastes Management



Scan code on reverse to authenticate that this is a genuine paper



CIWM

Continuing Competence Certificate

This certificate confirms that

Lee Shaw- Binns

Has met the relevant requirements of the Continuing Competence scheme for the following award(s) which will remain current for two years from 21/10/2025

TSH	Transfer - Hazardous Waste
TMH	Treatment - Hazardous Waste

Expiry Date:
21/10/2027

Verification date: 17/10/2025

Authorised:

Responsible Officer

Learner ID: 143767

Certificate No.: 5292134

Date of Issue: 21/10/2025

CIWM Chief Executive Officer



The Chartered Institution
of Wastes Management



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Continuing Competence Certificate

This certificate confirms that

Joanne Turner

Has met the relevant requirements of the Continuing Competence scheme for the following award(s) which will remain current for two years from 28/02/2025

TSH	Transfer - Hazardous Waste
TMH	Treatment - Hazardous Waste

Expiry Date:
28/02/2027

Verification date: 25/02/2025

Authorised:



Responsible Officer

Learner ID: 31478

Certificate No.: 5274742

Date of Issue: 28/02/2025



CIWM Chief Executive Officer

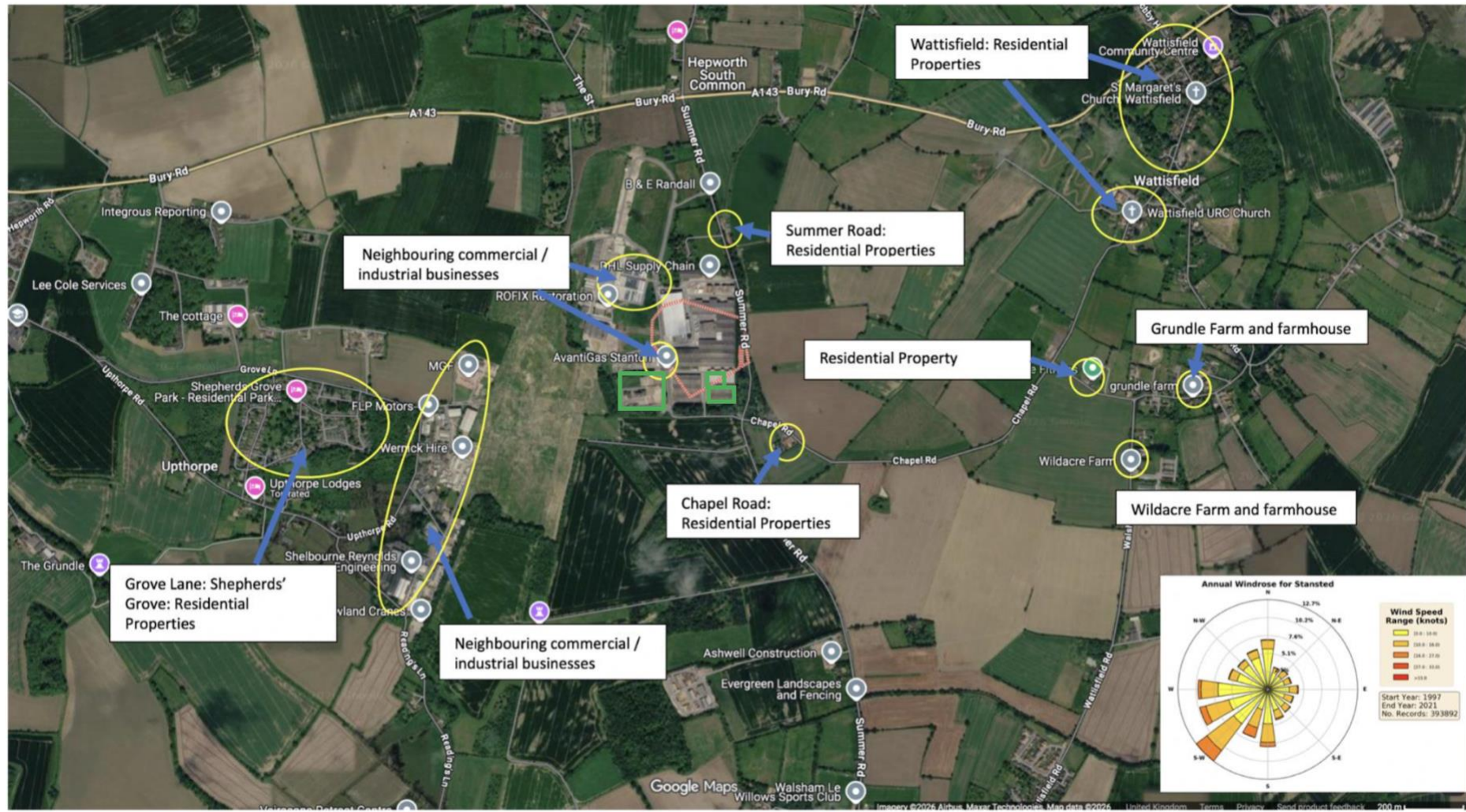


The Chartered Institution
of Wastes Management

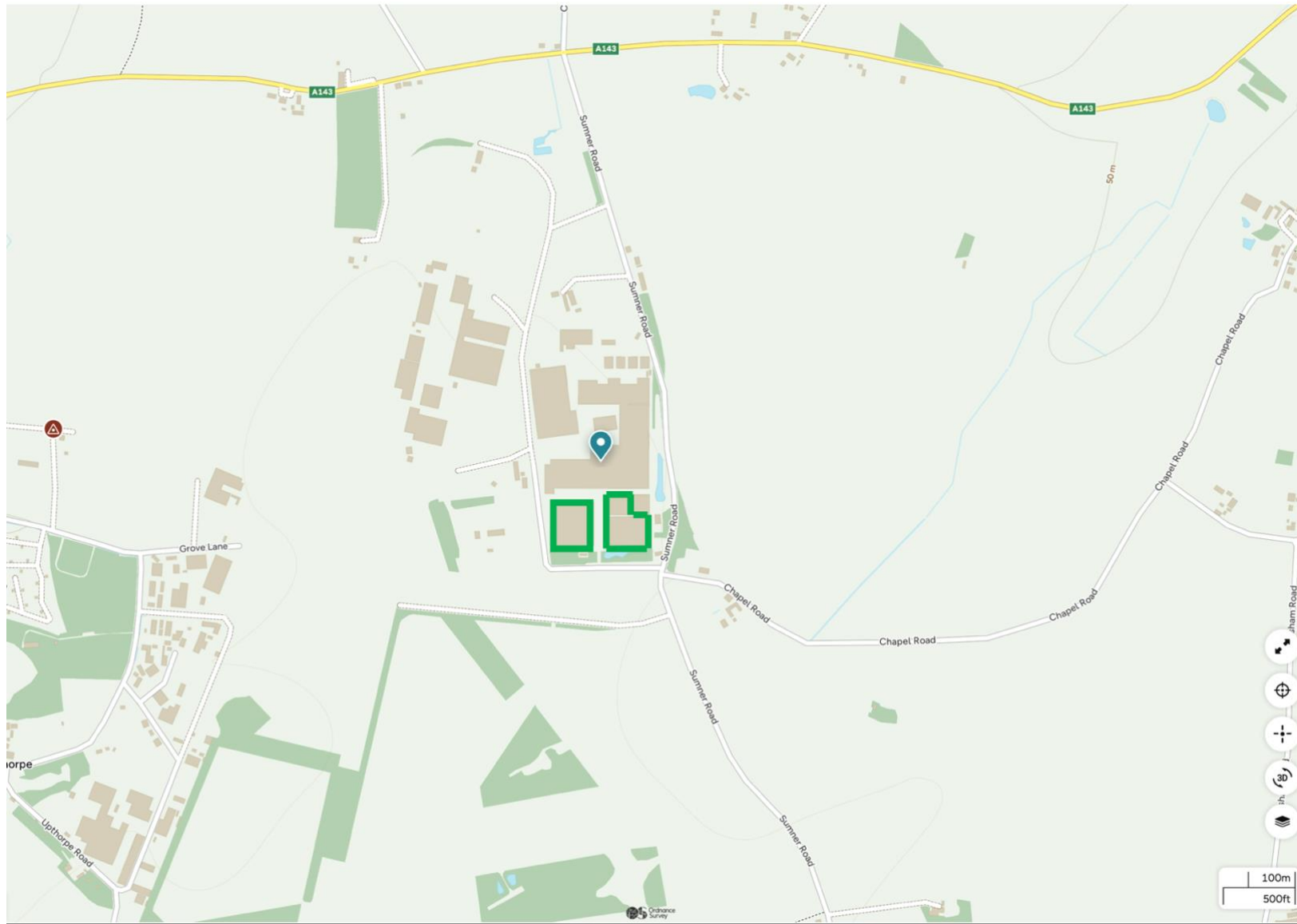


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Appendix 2: Site Location and Geographical Context Plan (detailing receptors)



Appendix 2 (a): OS Site Plan



Appendix 3: Additional BAT Conclusion Justification (also included within updated Document 9, as attached to email of 10.09.2026)

BAT Conclusion	Areera Response (07.09.2026)
BAT 1 – Environmental management systems AT 1. In order to improve the overall environmental performance, BAT is to implement and adhere to an environmental management system (EMS) that incorporates all of the following features: I. commitment of the management, including senior management; II. definition, by the management, of an environmental policy that includes the continuous improvement of the environmental performance of the installation; III. planning and establishing the necessary procedures, objectives and targets, in conjunction with financial planning and investment; IV. implementation of procedures paying particular attention to: (a) structure and responsibility, (b) recruitment, training, awareness and competence, (c) communication, (d) employee involvement, (e) documentation, (f) effective process control, (g) maintenance programmes, (h) emergency preparedness and response, (i) safeguarding compliance with environmental legislation; V. checking performance and taking corrective action, paying particular attention to: (a) monitoring and measurement (see also the JRC Reference Report on Monitoring of emissions to air and water from IED installations – ROM), (b) corrective and preventive action, (c) maintenance of records, (d) independent (where practicable) internal or external auditing in order to determine whether or not the EMS conforms to planned arrangements and has been properly implemented and maintained; VI. review, by senior management, of the EMS and its continuing suitability, adequacy and effectiveness; VII. following the development of cleaner technologies; VIII. consideration for the environmental impacts from the eventual decommissioning of the plant at the stage of designing a new plant, and throughout its operating life; IX. application of sectoral benchmarking on a regular basis; X. waste stream management (see BAT 2);	Certificate of the ISO14001 accreditation is pending. At present, Areera Ltd operates its Own Management System for the site, as detailed in Appendix 4. This adheres to the requirement of BAT 1 – i.e. to implement a compliant environmental management system (EMS).

XI. an inventory of waste water and waste gas streams (see BAT 3); XII. residues management plan (see description in Section 6.5); XIII. accident management plan (see description in Section 6.5); XIV. odour management plan (see BAT 12); XV. noise and vibration management plan (see BAT 17). Applicability The scope (e.g. level of detail) and nature of the EMS (e.g. standardised or non-standardised) will generally be related to the nature, scale and complexity of the installation, and the range of environmental impacts it may have (determined also by the type and amount of wastes processed).	
BAT 2. In order to improve the overall environmental performance of the plant, BAT is to use all of the techniques given below: a) Set up and implement waste characterisation and pre-acceptance procedures b) Set up and implement waste acceptance procedures c) Set up and implement a waste tracking system and inventory d) Set up and implement an output quality management system e) Ensure waste segregation f) Ensure waste compatibility prior to mixing or blending of waste g) Sort incoming solid waste	Waste pre-acceptance and acceptance controls and waste tracking system and inventory as set out in the written management system (Appendix 4) Outputs are identical to inputs – with no processing on site so an output quality management system is not applicable. Wastes will be segregated and stored by type as detailed in the written management system. There will be no mixing or blending of waste. All incoming waste is solid and will be sorted according to type.

BAT 3. In order to facilitate the reduction of emissions to water and air, BAT is to establish and to maintain an inventory of waste water and waste gas streams, as part of the environmental management system (see BAT 1)	Not Applicable: No emissions to water or air arising from the Installation activities.															
BAT 4: In order to reduce the environmental risk associated with the storage of waste, BAT is to use all of the techniques given below: <table><tr><th>Technique</th><th>Description</th><th>Applicability</th></tr><tr><td>a. Optimised storage location</td><td>This includes techniques such as: — the storage is located as far as technically and economically possible from sensitive receptors, watercourses, etc.; — the storage is located in such a way so as to eliminate or minimise the unnecessary handling of wastes within the plant (e.g. the same wastes are handled twice or more or the transport distances on site are unnecessarily long). </td><td>Generally applicable to new plants.</td></tr><tr><td>b. Adequate storage capacity</td><td>Measures are taken to avoid accumulation of waste, such as: — the maximum waste storage capacity is clearly established and not exceeded taking into account the characteristics of the wastes (e.g. regarding the risk of fire) and the treatment capacity; — the quantity of waste stored is regularly monitored against the maximum allowed storage capacity; — the maximum residence time of waste is clearly established. </td><td>Generally applicable.</td></tr><tr><td>c. Safe storage operation</td><td>This includes measures such as: — equipment used for loading, unloading and storing waste is clearly documented and labelled; — wastes known to be sensitive to heat, light, air, water, etc. are protected from such ambient conditions; — containers and drums are fit for purpose and stored securely. </td><td></td></tr><tr><td>d. Separate area for storage and handling of packaged hazardous waste</td><td>When relevant, a dedicated area is used for storage and handling of packaged hazardous waste.</td><td></td></tr></table>	Technique	Description	Applicability	a. Optimised storage location	This includes techniques such as: — the storage is located as far as technically and economically possible from sensitive receptors, watercourses, etc.; — the storage is located in such a way so as to eliminate or minimise the unnecessary handling of wastes within the plant (e.g. the same wastes are handled twice or more or the transport distances on site are unnecessarily long).	Generally applicable to new plants.	b. Adequate storage capacity	Measures are taken to avoid accumulation of waste, such as: — the maximum waste storage capacity is clearly established and not exceeded taking into account the characteristics of the wastes (e.g. regarding the risk of fire) and the treatment capacity; — the quantity of waste stored is regularly monitored against the maximum allowed storage capacity; — the maximum residence time of waste is clearly established.	Generally applicable.	c. Safe storage operation	This includes measures such as: — equipment used for loading, unloading and storing waste is clearly documented and labelled; — wastes known to be sensitive to heat, light, air, water, etc. are protected from such ambient conditions; — containers and drums are fit for purpose and stored securely.		d. Separate area for storage and handling of packaged hazardous waste	When relevant, a dedicated area is used for storage and handling of packaged hazardous waste.		Storage complies with the requirements set out in RPS375, the Environment Agency’s regulatory position statement on “Temporary Waste Temperature Exchange Equipment (WTEE) Storage, specifically with maximum storage pile sizes of 450m³ and maximum height of 3.6m. There are no immediately adjacent sensitive receptors and storage (in line with RPS375) minimises the unnecessary handling of wastes. Furthermore, maximum storage levels will be set and adhered to.
Technique	Description	Applicability														
a. Optimised storage location	This includes techniques such as: — the storage is located as far as technically and economically possible from sensitive receptors, watercourses, etc.; — the storage is located in such a way so as to eliminate or minimise the unnecessary handling of wastes within the plant (e.g. the same wastes are handled twice or more or the transport distances on site are unnecessarily long).	Generally applicable to new plants.														
b. Adequate storage capacity	Measures are taken to avoid accumulation of waste, such as: — the maximum waste storage capacity is clearly established and not exceeded taking into account the characteristics of the wastes (e.g. regarding the risk of fire) and the treatment capacity; — the quantity of waste stored is regularly monitored against the maximum allowed storage capacity; — the maximum residence time of waste is clearly established.	Generally applicable.														
c. Safe storage operation	This includes measures such as: — equipment used for loading, unloading and storing waste is clearly documented and labelled; — wastes known to be sensitive to heat, light, air, water, etc. are protected from such ambient conditions; — containers and drums are fit for purpose and stored securely.															
d. Separate area for storage and handling of packaged hazardous waste	When relevant, a dedicated area is used for storage and handling of packaged hazardous waste.															
BAT 5: In order to reduce the environmental risk associated with the handling and transfer of waste, BAT is to set up and implement handling and transfer procedures. Description Handling and transfer procedures aim to ensure that wastes are safely handled and transferred to the respective storage or treatment. They include the following elements: — handling and transfer of waste are carried out by competent staff; — handling and transfer of waste are duly documented, validated prior to execution and verified after execution; — measures are taken to prevent, detect and mitigate spills; — operation and design precautions are taken when mixing or blending wastes (e.g. vacuuming dusty/powdery wastes). Handling and transfer procedures are risk-based considering the likelihood of accidents and incidents and their environmental impact.	Wastes will be unloaded and configured into storage piles using a fork-lift truck with suitably-authorised, competent staff. This will also be the case for the loading procedures (for transfer). Waste transfer (incoming waste, storage stock and outgoing waste) will be documented on the FRED software and will be used to inform the required data under the Digital Waste Tracking System (DWTS). The waste will be stored to prevent spills by storing the WTEE appropriately and without having the exposed coolant system facing down. Spill kits will be provided to mitigate against any spills. There will be no mixing or blending of wastes and handling and transfer procedures will be															

	risk-based and in line with best practice guidance.
BAT 6: For relevant emissions to water as identified by the inventory of waste water streams (see BAT 3), BAT is to monitor key process parameters (e.g. waste water flow, pH, temperature, conductivity, BOD) at key locations (e.g. at the inlet and/or outlet of the pre-treatment, at the inlet to the final treatment, at the point where the emission leaves the installation).	Not Applicable: No emissions to water
BAT 7: BAT is to monitor emissions to water with at least the frequency given below, and in accordance with EN standards. If EN standards are not available, BAT is to use ISO, national or other international standards that ensure the provision of data of an equivalent scientific quality.	Not Applicable: No emissions to water
BAT 8: BAT is to monitor channelled emissions to air with at least the frequency given below, and in accordance with EN standards. If EN standards are not available, BAT is to use ISO, national or other international standards that ensure the provision of data of an equivalent scientific quality.	Not Applicable: No emissions to air
BAT 9: BAT is to monitor diffuse emissions of organic compounds to air from the regeneration of spent solvents, the decontamination of equipment containing POPs with solvents, and the physico-chemical treatment of solvents for the recovery of their calorific value, at least once per year using one or a combination of the techniques given below.	Not Applicable: No diffuse emissions of organic compounds to air from the regeneration of spent solvents, the decontamination of equipment containing POPs with solvents, and the physico-chemical treatment of solvents for the recovery of their calorific value
BAT 10: BAT is to periodically monitor odour emissions. Description Odour emissions can be monitored using: — EN standards (e.g. dynamic olfactometry according to EN 13725 in order to determine the odour concentration or EN 16841-1 or -2 in order to determine the odour exposure); — when applying alternative methods for which no EN standards are available (e.g. estimation of odour impact), ISO, national or other international standards that ensure the provision of data of an equivalent scientific quality. The monitoring frequency is determined in the odour management plan (see BAT 12). Applicability: The applicability is restricted to cases where an odour nuisance at sensitive receptors is expected and/or has been substantiated.	Not Applicable: Odour nuisance at sensitive receptors is not expected, given the odour-free nature of the waste streams. There is no history or likelihood of substantiated complaints over odour.

BAT 11: BAT is to monitor the annual consumption of water, energy and raw materials as well as the annual generation of residues and waste water, with a frequency of at least once per year.			The installation activities will not result in the consumption of water (water will be used for welfare activities only). The only consumption of energy and raw materials will be the use of gas for the gas-powered fork-lift truck(s). This will be recorded on an annual basis.
BAT 12: In order to prevent or, where that is not practicable, to reduce odour emissions, BAT is to set up, implement and regularly review an odour management plan, as part of the environmental management system (see BAT 1)			Not Applicable: Odour nuisance at sensitive receptors is not expected, given the odour-free nature of the waste streams. There is no history or likelihood of substantiated complaints over odour.
BAT 13: In order to prevent or, where that is not practicable, to reduce odour emissions, BAT is to use one or a combination of the techniques given below.			Not Applicable: Odour nuisance at sensitive receptors is not expected, given the odour-free nature of the waste streams. There is no history or likelihood of substantiated complaints over odour.
Technique	Description	Applicability	
a. Minimising residence times	Minimising the residence time of (potentially) odorous waste in storage or in handling systems (e.g. pipes, tanks, containers), in particular under anaerobic conditions. When relevant, adequate provisions are made for the acceptance of seasonal peak volumes of waste.	Only applicable to open systems.	
b. Using chemical treatment	Using chemicals to destroy or to reduce the formation of odorous compounds (e.g. to oxidise or to precipitate hydrogen sulphide).	Not applicable if it may hamper the desired output quality.	
c. Optimising aerobic treatment	In the case of aerobic treatment of water-based liquid waste, it may include: — use of pure oxygen; — removal of scum in tanks; — frequent maintenance of the aeration system. In the case of aerobic treatment of waste other than water-based liquid waste, see BAT 36.	Generally applicable.	
BAT 14: In order to prevent or, where that is not practicable, to reduce diffuse emissions to air, in particular of dust, organic compounds and odour, BAT is to use an appropriate combination of the techniques given below. Depending on the risk posed by the waste in terms of diffuse emissions to air, BAT 14d is especially relevant.			Not Applicable: No diffuse emissions to air.

Technique	Description	Applicability
a. Minimising the number of potential diffuse emission sources	This includes techniques such as: — appropriate design of piping layout (e.g. minimising pipe run length, reducing the number of flanges and valves, using welded fittings and pipes); — favouring the use of gravity transfer rather than using pumps; — limiting the drop height of material; — limiting traffic speed; — using wind barriers.	Generally applicable.
b. Selection and use of high-integrity equipment	This includes techniques such as: — valves with double packing seals or equally efficient equipment; — high-integrity gaskets (such as spiral wound, ring joints) for critical applications; — pumps/compressors/agitators fitted with mechanical seals instead of packing; — magnetically driven pumps/compressors/agitators; — appropriate service hose access ports, piercing pliers, drill heads, e.g. when degassing WEEE containing VFCs and/or VHCs.	Applicability may be restricted in the case of existing plants due to operability requirements.
c. Corrosion prevention	This includes techniques such as: — appropriate selection of construction materials; — lining or coating of equipment and painting of pipes with corrosion inhibitors.	Generally applicable.
d. Containment, collection and treatment of diffuse emissions	This includes techniques such as: — storing, treating and handling waste and material that may generate diffuse emissions in enclosed buildings and/or enclosed equipment (e.g. conveyor belts); — maintaining the enclosed equipment or buildings under an adequate pressure; — collecting and directing the emissions to an appropriate abatement system (see Section 6.1) via an air extraction system and/or air suction systems close to the emission sources.	The use of enclosed equipment or buildings may be restricted by safety considerations such as the risk of explosion or oxygen depletion. The use of enclosed equipment or buildings may also be constrained by the volume of waste.
e. Dampening	Dampening potential sources of diffuse dust emissions (e.g. waste storage, traffic areas, and open handling processes) with water or fog.	Generally applicable.
f. Maintenance	This includes techniques such as: — ensuring access to potentially leaky equipment; — regularly controlling protective equipment such as lamellar curtains, fast-action doors.	Generally applicable.
g. Cleaning of waste treatment and storage areas	This includes techniques such as regularly cleaning the whole waste treatment area (halls, traffic areas, storage areas, etc.), conveyor belts, equipment and containers.	Generally applicable.
h. Leak detection and repair (LDAR) programme	See Section 6.2. When emissions of organic compounds are expected, a LDAR programme is set up and implemented using a risk-based approach, considering in particular the design of the plant and the amount and nature of the organic compounds concerned.	Generally applicable.
BAT 15: BAT is to use flaring only for safety reasons or for non-routine operating conditions (e.g. start-ups, shutdowns) by using both of the techniques given below.		
Not applicable: No flaring		
BAT 16: In order to reduce emissions to air from flares when flaring is unavoidable, BAT is to use both of the techniques given below: ➤ Correct design of flare ➤ Monitoring / recording of flare		
Not applicable: No flaring		
BAT 17: BAT 17. In order to prevent or, where that is not practicable, to reduce noise and vibration emissions, BAT is to set up, implement and regularly review a noise and vibration management plan, as part of the environmental management system (see BAT 1), that includes all of the following elements: I. a protocol containing appropriate actions and timelines; II. a protocol for conducting noise and vibration monitoring; III.		
Not applicable: A noise or vibration nuisance at sensitive receptors is not expected and/or has not been substantiated.		

a protocol for response to identified noise and vibration events, e.g. complaints; IV. a noise and vibration reduction programme designed to identify the source(s), to measure/estimate noise and vibration exposure, to characterise the contributions of the sources and to implement prevention and/or reduction measures. Applicability: The applicability is restricted to cases where a noise or vibration nuisance at sensitive receptors is expected and/or has been substantiated.																			
BAT 18: In order to prevent or, where that is not practicable, to reduce noise and vibration emissions, BAT is to use one or a combination of the techniques given below: <table><tr><th>Technique</th><th>Description</th><th>Applicability</th></tr><tr><td>a. Appropriate location of equipment and buildings</td><td>Noise levels can be reduced by increasing the distance between the emitter and the receiver, by using buildings as noise screens and by relocating building exits or entrances.</td><td>For existing plants, the relocation of equipment and building exits or entrances may be restricted by a lack of space or excessive costs.</td></tr><tr><td>b. Operational measures</td><td>This includes techniques such as: (i) inspection and maintenance of equipment; (ii) closing of doors and windows of enclosed areas, if possible; (iii) equipment operation by experienced staff; (iv) avoidance of noisy activities at night, if possible; (v) provisions for noise control during maintenance, traffic, handling and treatment activities.</td><td>Generally applicable.</td></tr><tr><td>c. Low-noise equipment</td><td>This may include direct drive motors, compressors, pumps and flares.</td><td></td></tr><tr><td>d. Noise and vibration control equipment</td><td>This includes techniques such as: (i) noise reducers; (ii) acoustic and vibrational insulation of equipment; (iii) enclosure of noisy equipment; (iv) soundproofing of buildings.</td><td>Applicability may be restricted by a lack of space (for existing plants).</td></tr><tr><td>e. Noise attenuation</td><td>Noise propagation can be reduced by inserting obstacles between emitters and receivers (e.g. protection walls, embankments and buildings).</td><td>Applicable only to existing plants, as the design of new plants should make this technique unnecessary. For existing plants, the insertion of obstacles may be restricted by a lack of space. For mechanical treatment in shredders of metal wastes, it is applicable within the constraints associated with the risk of deflagration in shredders.</td></tr></table>	Technique	Description	Applicability	a. Appropriate location of equipment and buildings	Noise levels can be reduced by increasing the distance between the emitter and the receiver, by using buildings as noise screens and by relocating building exits or entrances.	For existing plants, the relocation of equipment and building exits or entrances may be restricted by a lack of space or excessive costs.	b. Operational measures	This includes techniques such as: (i) inspection and maintenance of equipment; (ii) closing of doors and windows of enclosed areas, if possible; (iii) equipment operation by experienced staff; (iv) avoidance of noisy activities at night, if possible; (v) provisions for noise control during maintenance, traffic, handling and treatment activities.	Generally applicable.	c. Low-noise equipment	This may include direct drive motors, compressors, pumps and flares.		d. Noise and vibration control equipment	This includes techniques such as: (i) noise reducers; (ii) acoustic and vibrational insulation of equipment; (iii) enclosure of noisy equipment; (iv) soundproofing of buildings.	Applicability may be restricted by a lack of space (for existing plants).	e. Noise attenuation	Noise propagation can be reduced by inserting obstacles between emitters and receivers (e.g. protection walls, embankments and buildings).	Applicable only to existing plants, as the design of new plants should make this technique unnecessary. For existing plants, the insertion of obstacles may be restricted by a lack of space. For mechanical treatment in shredders of metal wastes, it is applicable within the constraints associated with the risk of deflagration in shredders.	Not applicable: A noise or vibration nuisance at sensitive receptors is not expected and/or has not been substantiated.
Technique	Description	Applicability																	
a. Appropriate location of equipment and buildings	Noise levels can be reduced by increasing the distance between the emitter and the receiver, by using buildings as noise screens and by relocating building exits or entrances.	For existing plants, the relocation of equipment and building exits or entrances may be restricted by a lack of space or excessive costs.																	
b. Operational measures	This includes techniques such as: (i) inspection and maintenance of equipment; (ii) closing of doors and windows of enclosed areas, if possible; (iii) equipment operation by experienced staff; (iv) avoidance of noisy activities at night, if possible; (v) provisions for noise control during maintenance, traffic, handling and treatment activities.	Generally applicable.																	
c. Low-noise equipment	This may include direct drive motors, compressors, pumps and flares.																		
d. Noise and vibration control equipment	This includes techniques such as: (i) noise reducers; (ii) acoustic and vibrational insulation of equipment; (iii) enclosure of noisy equipment; (iv) soundproofing of buildings.	Applicability may be restricted by a lack of space (for existing plants).																	
e. Noise attenuation	Noise propagation can be reduced by inserting obstacles between emitters and receivers (e.g. protection walls, embankments and buildings).	Applicable only to existing plants, as the design of new plants should make this technique unnecessary. For existing plants, the insertion of obstacles may be restricted by a lack of space. For mechanical treatment in shredders of metal wastes, it is applicable within the constraints associated with the risk of deflagration in shredders.																	
BAT 19: Emissions to Water: In order to optimise water consumption, to reduce the volume of waste water generated and to prevent or, where that	Not Applicable: No emissions to water																		

is not practicable, to reduce emissions to soil and water, BAT is to use an appropriate combination of the techniques given (in BAT 19).									
BAT 20: In order to reduce emissions to water, BAT is to treat waste water using an appropriate combination of the techniques given (in BAT 20)	Not Applicable: No emissions to water								
BAT 21: In order to prevent or limit the environmental consequences of accidents and incidents, BAT is to use all of the techniques given below, as part of the accident management plan (see BAT 1): <table border="1" data-bbox="156 636 1082 925"> <thead> <tr> <th>Technique</th><th>Description</th></tr> </thead> <tbody> <tr> <td>a. Protection measures</td><td>These include measures such as: — protection of the plant against malevolent acts; — fire and explosion protection system, containing equipment for prevention, detection, and extinction; — accessibility and operability of relevant control equipment in emergency situations.</td></tr> <tr> <td>b. Management of incidental/accidental emissions</td><td>Procedures are established and technical provisions are in place to manage (in terms of possible containment) emissions from accidents and incidents such as emissions from spillages, firefighting water, or safety valves.</td></tr> <tr> <td>c. Incident/accident registration and assessment system</td><td>This includes techniques such as: — a log/diary to record all accidents, incidents, changes to procedures and the findings of inspections; — procedures to identify, respond to and learn from such incidents and accidents.</td></tr> </tbody> </table>	Technique	Description	a. Protection measures	These include measures such as: — protection of the plant against malevolent acts; — fire and explosion protection system, containing equipment for prevention, detection, and extinction; — accessibility and operability of relevant control equipment in emergency situations.	b. Management of incidental/accidental emissions	Procedures are established and technical provisions are in place to manage (in terms of possible containment) emissions from accidents and incidents such as emissions from spillages, firefighting water, or safety valves.	c. Incident/accident registration and assessment system	This includes techniques such as: — a log/diary to record all accidents, incidents, changes to procedures and the findings of inspections; — procedures to identify, respond to and learn from such incidents and accidents.	As described in the Written Management System, the open storage yard, which is approximately 5 acres, will be protected by CCTV coverage to provide monitoring of the open storage area and the perimeter of the Areera site. A secure site cabin will also be provided as part of the site security arrangements. CCTV arrangements will be maintained and reviewed as part of the site management system to support the prevention and detection of unauthorised access and other security incidents. The site has secure fencing around its perimeter and secure access. The site operates in accordance with a Fire Prevention Plan. As detailed in the Written Management System, any notifiable incidents or accidents will be logged/recorded.
Technique	Description								
a. Protection measures	These include measures such as: — protection of the plant against malevolent acts; — fire and explosion protection system, containing equipment for prevention, detection, and extinction; — accessibility and operability of relevant control equipment in emergency situations.								
b. Management of incidental/accidental emissions	Procedures are established and technical provisions are in place to manage (in terms of possible containment) emissions from accidents and incidents such as emissions from spillages, firefighting water, or safety valves.								
c. Incident/accident registration and assessment system	This includes techniques such as: — a log/diary to record all accidents, incidents, changes to procedures and the findings of inspections; — procedures to identify, respond to and learn from such incidents and accidents.								
BAT 22: In order to use materials efficiently, BAT is to substitute materials with waste.	Not applicable as 100% of inputs into the Installation activities will be waste								
BAT 23: In order to use energy efficiently, BAT is to use both of the techniques given below:	The only use of energy for the Installation activities will be the use of gas for the gas-powered fork-lift trucks (FLTs). Energy use will be recorded.								

Technique	Description	
a. Energy efficiency plan	An energy efficiency plan entails defining and calculating the specific energy consumption of the activity (or activities), setting key performance indicators on an annual basis (for example, specific energy consumption expressed in kWh/tonne of waste processed) and planning periodic improvement targets and related actions. The plan is adapted to the specificities of the waste treatment in terms of process(es) carried out, waste stream(s) treated, etc.	
b. Energy balance record	An energy balance record provides a breakdown of the energy consumption and generation (including exportation) by the type of source (i.e. electricity, gas, conventional liquid fuels, conventional solid fuels, and waste). This includes: (i) information on energy consumption in terms of delivered energy; (ii) information on energy exported from the installation; (iii) energy flow information (e.g. Sankey diagrams or energy balances) showing how the energy is used throughout the process. The energy balance record is adapted to the specificities of the waste treatment in terms of process(es) carried out, waste stream(s) treated, etc.	
BAT 24: In order to reduce the quantity of waste sent for disposal, BAT is to maximise the reuse of packaging, as part of the residues management plan (see BAT 1)		Not applicable as no packaging associated with the Installation activities.
BAT 25 -28 (Section 2) apply to the mechanical treatment of waste and are therefore not relevant to this Installation.		Not applicable.
BAT 29 – 30 Apply to the treatment of WEEE containing VFCs and/or VHCs and are therefore not relevant to this Installation.		Not applicable.
BAT 31: BAT conclusions for the mechanical treatment of waste with calorific value and is therefore not relevant to this Installation.		Not applicable.
BAT 32: Applies to the mechanical treatment of WEEE containing mercury and is therefore not relevant to this Installation.		Not applicable.
BAT 33-35: Apply to the biological treatment of waste and are therefore not relevant to this Installation.		Not applicable.
BAT 36 -37: Apply to the aerobic treatment of waste, and are therefore not relevant to this Installation.		Not applicable.
BAT 38: Applies to the anaerobic treatment of waste, and is therefore not relevant to this Installation.		Not applicable.
BAT 39: Applies to the mechanical biological treatment (MBT) of waste, and is therefore not relevant to this Installation.		Not applicable.
BAT 40 – 51 : Apply to the physico-chemical treatment of waste, and are therefore not relevant to this Installation.		Not applicable.
BAT 52 – 53: Applies to the treatment of water-based liquid waste, and are therefore not relevant to this Installation.		Not applicable.

End of Document.