Operating Techniques

Chertsey Green Waste Transfer Station: Environmental Permit Application

Envar Composting Limited

Prepared by:

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Basis of Report

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1.0 INTRODUCTION

Envar Composting Limited (Envar) has retained SLR Consulting Limited (SLR) to prepare a bespoke Environmental Permit (EP) application under the Environmental Permitting (England and Wales) Regulations (as amended) 2016, for the Chertsey Green Waste Transfer Station (WTS) located in Chertsey, Surrey, KT16 0EF.

Envar currently operate a green waste bulking and transfer operation at Chertsey Green WTS under a T6 Waste Exemption (*Treating Waste Wood and Waste Plant Matter by Chipping, Shredding, Cutting or Pulverising*). The conditions of the T6 waste exemption are due to change which will reduce the waste storage limits below what is commercially viable for this site. It will also significantly restrict the local authority's ability to use the site, which is key to serving the green waste transfer requirements for the county. The local authority relies on the ability to transfer green waste in bulk to prevent excessive travel and carbon emissions in smaller vehicles Therefore, Envar wish to apply for a bespoke EP to facilitate the continued green waste bulking and transfer activities on site prior to transfer to suitably permitted composting sites for further treatment. There will be no change to the existing waste types, activities, or storage arrangements at the site as a result of the EP application, and therefore it is not considered that the proposed EP application will increase the risk of the site.

This Operating Techniques (OT) document sets out best practice for operating the site, based on legislation and best available techniques in the industry.

The OT has been drafted to ensure compliance with the EA's guidance '*Develop a Management System: Environmental Permits'*[1], last updated April 2023, in addition to the *'Non-Hazardous and Inert Waste: Appropriate Measures for Permitted Facilities*[2]*'* guidance updated August 2023.

The site location is illustrated on Drawing 001, and the EP Boundary and Site Layout are illustrated on Drawing 002. Drawing 003 illustrates the site's environmental site setting.

The OT will be reviewed and updated on an annual basis or because of any of the following activities (list not exhaustive):

- The issue of an EP variation by the Environment Agency (EA);
- A material change to the operational process;
- A substantiated complaint; or
- Any changes in legislation or guidance documents applicable to the operations undertaken at Chertsey Green WTS.

This OT document is supplemented by the following documents submitted in addition to this EP application;

- EA Application Forms, Parts A, B2, B4, and F1 and associated appendices;
- Non-Technical Summary (NTS);
- Environmental Risk Assessment (ERA);
- Site Condition Report (SCR);
- Fire Prevention Plan (FPP);

[1] Develop a management system: environmental permits - GOV.UK (www.gov.uk)

[2] Non-hazardous and inert waste: appropriate measures for permitted facilities - Guidance - GOV.UK (www.gov.uk)

- Emissions (Dust) Management Plan (DEMP); and
- Associated Drawings.

Envar is fully conversant with its environmental responsibilities in relation to the site, and is committed to ensuring that its relevant facilities are designed, constructed and operated to the highest possible standards. It is intended that this will be clear from the detail contained within this OT.

1.1 Site Location

The site is situated approximately 1.7km south of Virginia Water and approximately 4.3km west of Chertsey. The site is accessed via Kitsmead Lane which runs to the west of the site, and the M3 lies approximately 90m north. The National Grid Reference (NGR) for the site is SU 99323 66260.

The immediate surrounding land consists of open/agricultural land, commercial/industrial premises, and residential properties. The closest residential properties to the site are situated approximately 210m north along Trumps Green Road.

The site location is illustrated on Drawing 001, and the EP boundary and site layout is shown on Drawing 002.

The surrounding land uses and local receptors within 500m are identified on Drawing 003, in addition to the cultural and natural heritage within 1km,

A summary of the site's immediate surrounding land uses is identified in Table 1-1 below.

Table 1-1: Surrounding Land Uses

Boundary	Description
North	An area of open ground/woodland, followed by the M3, and the residential area of Trumps Green including Virginia Water Football Club.
East	Open/agricultural land, beyond which lies Trumps Farm, Splitz Facilities and further areas of open/agricultural land and woodland.
South	Immediately to the south lies an area of open/agricultural land and woodland, and a surface water pond. Beyond this lies a commercial/industrial area including Facilities by ADF, Morris Leslie Plant Hire & Sales, and Severn Trent Green Power West. This is followed by a woodland area, and Chertsey Common.
West	Kitsmead Lane and open/agricultural land followed by a commercial/industrial area including James Mansfield Timber, Pilgrim 2 Workshops, Longcross Studios, and 5 Star Roofcare. Beyond this lies Longcross Estate.

1.2 Report Structure

This report describes the operating techniques that will be implemented at the facility to ensure compliance with the conditions of the EP. The report is divided into the following sections:

- **Section 1** Introduction
- **Section 2** General Management Appropriate Measures
- **Section 3** Accident Prevention and Management Plan
- **Section 4** Operations
- **Section 5** Waste Pre-Acceptance, Acceptance and Tracking

- **Section 6** Waste Storage
- **Section 7** Waste Treatment
- **Section 8** Emissions Control
- **Section 9** Information

1.3 Document Revision

Any changes to the OT will be labelled in chronological order, and the date of the change recorded. All records of the changes will be listed in the revision history in Table 1-2 below:

Table 1-2: Revision History

Version	Reason for Revision	Date of Revision	Signature of Site Manager

2.0 General Management Appropriate Measures

2.1 Management System

The site will be operated in accordance with Envar's ISO14001 and ISO9001 Management System and the site specific OT document which will ensure that:

- The risks that the activities pose to the environment are identified;
- The measures that are required to minimise the risks are identified;
- The activities are managed in accordance with the management system and OT document;
- Performance against the management system is audited at regular intervals; and
- The EP is complied with.

The management system will be supplemented by this document which outlines the proposed operating techniques at the site and demonstrates conformance with the requirements of relevant published EA Guidance.

2.2 Management Structure and Responsibilities

The Site Manager will be responsible for day to day operations and compliance with the EP.

Whenever the site is open to receive or dispatch waste, or carry out any of the waste management operations, it will be supervised by at least one member of staff who is suitably trained and fully conversant with the requirements of the EP relating to:

- Waste acceptance and control procedures;
- Operational controls;
- Maintenance;
- Record-keeping;
- Emergency action plans; and
- Notifications to the EA.

2.3 Technical Competence and Training

The site will be managed by sufficient staff, competent to operate the site. The management system will ensure the following:

- All staff will have clearly defined roles and responsibilities;
- Records will be maintained of the skills required for each post;
- Records will be maintained of the training and relevant qualifications undertaken by staff to meet the requirement of each post; and
- Operations will be governed by standard operating instructions.

Operations at the site will be under the overall control of a technically competent person who holds the relevant Certificate of Technical Competence (COTC) under the Waste Management Industry Training and Advisory Board (WAMITAB) scheme.

An assessment of staff training needs will be carried out to identify the posts for which specific environmental awareness training is needed, and to determine the scope and level of such training. The assessment of training needs will be reviewed on an annual basis.

The training programme will ensure that relevant staff are aware of the following:

- Regulatory implications of the EP for the site and their specific work activity;
- All potential environmental effects from operations under normal and abnormal circumstances;
- The need to report deviations from the permit; and
- Prevention of accidental emissions and the action to be taken should accidental emissions occur.

A copy of this OT and the EP will be made available at the facility for the attention of all staff. They will be informed of the importance of these documents and the key areas of concern, and fully briefed on the role of the EA in enforcing compliance.

2.4 Site Security

In order to prevent unauthorised access, a number of site security measures are in place, as follows;

- The site is manned during operational hours by site staff who undertake regular inspections of the site;
- The site is surrounded by a security fence, and access gate which is locked outside of operational hours. Plant and offices are locked outside of operational hours; and
- The site benefits from CCTV coverage.

All visitors to the site (other than those delivering waste) are required to report to the site office on arrival and register in the visitor's book and sign out again on exit. This minimises the risk of unauthorised visitors being present at the site.

The site is maintained and repaired to ensure its continued integrity. The site is inspected daily by the operations staff to identify deterioration and damage and the need for any repairs. In the event that damage is sustained repairs will be made by the end of the working day. If this is not possible, suitable measures will be taken to prevent any unauthorised access to the site and permanent repairs will be affected as soon as practicable.

All inspections, any defects, damage or repairs will be recorded in the Site Diary.

2.5 Display of EP

A copy of the EP will be kept available for reference by all staff and contractors whose work may have an impact on the environment.

2.6 Facility Decommissioning

The site will require a simple decommissioning due the minimal infrastructure present on site. Decommissions will consist of the mechanical and electrical removal of all plant and equipment and the deconstruction of the push walls along the back, and two sides of the site. There will be no building, subsurface tanks or pipework, drains or potentially dusty insulation to remove.

The decommissioning plan will demonstrate that:

- The plant can be decommissioned without causing pollution; and
- The site will be returned to a satisfactory state.

2.6.1 Permit Surrender

A SCR dated August 2024, has been prepared in support of the EP application (Ref: 402.065376.00001/SCR). The SCR sets out the baseline conditions of the site for comparison at the point of EP surrender.

The SCR will be updated during the operational life of the site as appropriate. To assist with EP surrender, records will be maintained to demonstrate how the land has been protected at all times between the date of EP issue and surrender.

2.7 Managing Documentation and Records

Controls will be in place to ensure that all documents are issued, revised and maintained in a consistent fashion.

The documents that will be in the scope of controls are as follows:

- Policies;
- Responsibilities;
- Targets;
- Maintenance records;
- Procedures;
- Monitoring records;
- Results of audits;
- Results of reviews;
- Complaints and incident records; and
- Training records.

Records are made and kept up to date on a daily basis to reflect deliveries, on-site storage and dispatches. All records relating to waste acceptance are maintained and kept readily available on site and kept for a minimum of 2 years, and will be made available for inspection by the EA at all reasonable times.

2.8 Reporting Non-Compliance and Taking Corrective Action

Procedures will ensure appropriate corrective action is taken in response to problems identified at the site. The procedures will ensure that non-conformances are reported, investigated and rectified, and that failures and weaknesses are prevented. The following aspects will be considered:

- Actual or potential non-compliance;
- System failure discovered at internal audit;
- Suppliers or subcontractors breaking the agreed operating rules;
- Incidents, accidents, and emergencies;
- Other operational system failure; and
- Complaints.

The action taken in response to the non-conformance may include:

- Obtaining additional information on the nature and extent of the non-conformance;
- Discussing and testing alternative solutions;

- Modifying procedures and responsibilities;
- Seeking approval for additional resources and training; and
- Contacting suppliers and contractors (as applicable).

2.9 Auditing and Legal Compliance

There will be a formalised internal auditing procedure to ensure the facility is audited at defined intervals and that the progress of corrective and preventative action is monitored.

2.10 Monitoring, Measuring and Reviewing Environmental Performance

A formalised management structure will review environmental performance, and ensure any necessary actions are taken.

2.11 Operational Control, Preventative Maintenance and Calibration

The management system contains operational procedures that will ensure effective control of site operations, the use of approved suppliers, and contract services, the maintenance of operational equipment and calibration of monitoring equipment.

All plant and equipment will continue to be subject to a programme of planned preventative maintenance which will follow the inspection and maintenance schedule recommended by the manufacturer.

2.12 Design and Construction Quality Assurance

All relevant elements of the site have been designed in accordance with recognised standards, methodologies and practices.

The design process used a risk-based approach which was appropriately documented using drawings, specifications and method statements to provide an adequate audit trail.

Construction Quality Assurance (CQA) plans governed all construction activities necessary in the future. These CQA plans have been prepared by competent and suitably qualified persons.

A competent and suitably qualified person supervised the construction activities and prepared a validation report confirming that the key construction activities had been carried out in accordance with the CQA plan.

3.0 Accident Prevention and Management Plan

Envar recognises the importance of the prevention of accidents that may have environmental consequences and that it is crucial to limit those consequences.

An accident management plan will be implemented and maintained at the site to ensure that the site and staff are fully prepared for any such incidents. The accident management plan will be reviewed at least every four years or as soon as practicable after an incident, with changes made accordingly to minimise the risk of occurrence.

The Site Manager is responsible for managing accidents on site and ensuring the plan is understood by all site operatives.

Up to date records of all accidents, incidents, near misses, changes to procedures, abnormal events and findings of maintenance inspections will be kept within the site diary.

The EA will be notified upon detection of any of the events detailed in Section 3.1.

The following accident management plan describes the techniques that will be implemented to minimise the risks posed to the environment. Activities affecting the health and safety (H&S) of operatives, contractors and visitors will be separately managed in compliance with H&S regulation and company H&S Policy.

3.1 Hazard Identification

The following potential hazards have been identified in the ERA that was prepared using the ERA methodology and has been submitted in support of this EP application (ref. 402.065376.00001/ERA):

- Unauthorised waste;
- Fire;
- Loss of containment - spillage and leakage;
- Security and vandalism; and
- Flooding.

The following sections summarise the measures necessary to minimise the potential causes and consequences of accidents, as detailed in the ERA.

3.1.1 Unauthorised Waste

The acceptance of unauthorised materials could result in unacceptable wastes being accepted, and stored at the site.

The site only accepts a limited number of household green waste EWC codes from households and local gardeners. Strict waste acceptance procedures (WAP) are adhered to, to ensure that only permitted wastes are accepted on site. WAP identify, reject, and/or segregate potentially non-conforming waste.

All wastes arriving on site are subject to inspection and checking against the waste transfer note.

In the event that unauthorised waste is delivered to the site, the waste will be segregated and stored in a designated quarantine area prior to export from site, to an alternative suitably permitted facility.

3.1.2 Fire

The site will operate under an agreed FPP (Ref: 402.065376.00001/FPP). A copy of the FPP will be available on site at all times.

The plan follows EA guidance for FPPs[3], and details the required mitigation and management methods to prevent a fire of combustible materials stored on site. The information contained within the FPP aims to meet the 3 main objectives of the EA's FPP Guidance:

- Minimise the likelihood of a fire happening;
- Aim for a fire to be extinguished within 4 hours; and
- Minimise the spread of fire within the site and to neighbouring sites.

3.1.3 Loss of Containment

Loss of containment could lead to spillage and leakage of potentially contaminating liquids.

Fuel and oil tanks stored on site will be surrounded by a leakage containment bund capable of containing at least 110% of the volume of the largest container within the bund.

All vehicles and mobile plant on site are subject to a programme of planned preventative maintenance in accordance with the manufacturer's recommendations to prevent oil/fuel leaks from vehicles.

Site staff undertake daily monitoring for evidence of spillage and leakage.

Spill kits including material suitable for absorbing and containing minor spillages are maintained on site, and in the event of a minor spillage associated with vehicles or plant machinery will be cleared up immediately using appropriate materials and placed in suitable sealed containers.

Any dry wastes spilled on site will be collected and transported to the appropriate area of the site.

In the event of a major spillage, which is causing or is likely to cause polluting emissions to the environment, immediate action will be taken to contain the spillage and prevent liquid from flowing outside the EP boundary. The spillage will be cleared immediately and placed in containers for offsite disposal, and the EA will be informed.

3.1.4 Security and Vandalism

In order to prevent unauthorised access, a number of site security measures are in place, as follows;

- The site is manned during operational hours by site staff who undertake regular inspections of the site;
- The site is surrounded by a security fence, and access gate which is locked outside of operational hours;
- The site benefits from CCTV coverage;
- All visitors to the site are required to register in the visitor's book and sign out again on exit. This minimises the risk of unauthorised visitors being present on site;
- The site is inspected daily by the operations staff to identify deterioration and damage and the need for repairs. In the event that damage is sustained repairs will be made by the end of the working day. If this is not possible, suitable measures will be taken to prevent any unauthorised access to the site and permanent repairs will be affected as soon as practicable. All inspections, any defects, damage or repairs will be recorded in the Site Diary; and

[3] Fire prevention plans: environmental permits - GOV.UK (www.gov.uk)

- Operating procedures including regular inspections, ensure continual monitoring of security provisions at the site.

In the event of a breach of security at the site, the cause will be investigated, and appropriate mitigation measures implemented. This will be recorded in the Site Diary. Records maintained will include inspections and maintenance of security fencing and the gate, breaches of security, investigations and actions taken.

3.1.5 Flooding

There are no surface water features within the EP boundary.

The EA's Flood Map for Planning[4] confirms that the site is situated within Flood Zone 1, meaning the site has a low probability of flooding from rivers and the sea.

In the event that an accident occurs, or additional risks are identified, the Site Manager will be responsible for carrying out an investigation to determine the cause and implementing remedial action prior to logging this in the Site Diary.

3.2 Contingency Plans and Procedures

The site will implement a contingency plan to ensure that the following are achieved:

- Compliance with all EP conditions and operating procedures during maintenance or shutdown at the site, including disruption at other facilities that would affect supplies to the site or the removal of waste from it;
- No exceedance of limits in the EP and that appropriate measures for storing and handling waste are continued to be applied; and
- Cessation of waste acceptance unless there is a clearly defined method of recovery and enough permitted capacity on site.

[4] Flood map for planning - GOV.UK (flood-map-for-planning.service.gov.uk)

4.0 OPERATIONS

Envar currently operate a green waste bulking and transfer operation at Chertsey Green WTS under a T6 Waste Exemption (*Treating Waste Wood and Waste Plant Matter by Chipping, Shredding, Cutting or Pulverising*). The conditions of the T6 waste exemption are due to change which will reduce the waste storage limits below what is commercially viable for this site. It will also significantly restrict the local authority's ability to use the site, which is key to serving the green waste transfer requirements for the county. The local authority relies on the ability to transfer green waste in bulk to prevent excessive travel and carbon emissions in smaller vehicles Therefore, Envar wish to apply for a bespoke EP to facilitate the continued green waste bulking and transfer activities on site prior to transfer to suitably permitted composting sites for further treatment. There will be no change to the existing waste types, activities, or storage arrangements at the site as a result of the EP application, and therefore it is not considered that the proposed EP application will increase the risk of the site.

The proposed Chertsey Green WTS will accept up to 35,000 tonnes per annum (tpa) of un-shredded green waste. A maximum of 500 tonnes of green waste will be stored on site at any one time (two 250 tonne stockpiles). The only waste activities undertaken on site will continue to be the bulking up, storage and transfer of household green waste.

4.1 Process Description

Green waste collected from residential premises in Surrey is delivered to site by standard 6-8 tonne Refuse Collection Vehicles (RCVs). Upon arrival, waste is tipped into the designated reception area to the north of the site where on site plant transfers the material to the relevant storage area. The site also accepts green waste from local gardeners.

The back of the site benefits from push walls which extend partially down the two sides. Green waste is tipped at the front of the site and is visually inspected before being towards the back wall. The site operates on a rolling basis where waste is tipped out at the left and then to the right.

Waste is stored on site, and bulked up into 26 tonne artics prior to transfer to suitably permitted composting sites for further treatment.

Treatment on site will continue to only consist of the bulking up and transfer of household green waste.

4.2 Specified Waste Management Activities

The activities that will be carried out at the site as defined under Annex II of the Waste Framework Directive can be summarised as follows:

- **R13:** Storage of wastes.

4.3 Waste Types and Storage

The site will continue to accept up to 35,000 tpa of waste.

The site accepts, and stores both waste and non-waste materials.

Waste material accepted on site consists of un-shredded green waste only from households, and local gardeners. Up to 500 tonnes of un-shredded green waste will be stored on site at any one time.

During Spring, Summer, and Autumn (March to November) green waste will typically be moved off site within a maximum of 48 hours, and always within a maximum of 5 days to allow for operational flexibility.

The proposed waste lists for the site are as listed below in Table 4-1, and Table 4-2.

Table 4-1 Proposed Waste List

Waste Code	Description
02	WASTES FROM AGRICULTURE, HORTICULTURE, AQUACULTURE, FORESTRY, HUNTING AND FISHING, FOOD PREPARATION AND PROCESSING
02 01	Wastes from agriculture, horticulture, aquaculture, forestry, hunting and fishing
02 01 07	Wastes from forestry
20	MUNICIPAL WASTES (HOUSEHOLD WASTE AND SIMILAR COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL WASTES) INCLUDING SEPARATELY COLLECTED FRACTIONS
20 02	Garden and park wastes (including cemetery waste)
20 02 01	Biodegradable waste

Non-waste materials are stored in bays within a designated area to the east of the site as illustrated on Drawing 002. Non-waste materials are segregated, and not mixed with waste materials or other non-waste materials. They are not covered by the EA's Guidance or jurisdiction but are described within this EP application for completion to provide wider context of the site.

Non-waste materials stored on site consist of the following:

- PAS100 compost (brought in from partner sites to sell to local businesses only);
- Untreated virgin logs from arboriculture i.e. tree surgeons; and
- Untreated virgin wood chip from arboriculture i.e. tree surgeons.

4.4 Permitted Hours of Operation

Haulage of transferred materials would typically be undertaken at the WTS from 07:00 to 17:00, Monday to Friday. To ensure continuity of service, the Site would occasionally be operational on Saturdays and Sundays, public holidays and over the Christmas and New Year period.

4.5 Site Infrastructure and Equipment

4.5.1 Site Identification Board

A site identification board which is easily readable from outside the entrance during hours of daylight will be provided by the main site entrance.

The identification board will be inspected at least once per week. In the event of damage or defect that significantly affects the legibility of the board it will be repaired or replaced within a timescale agreed upon with the EA.

The board will display the following information:

- Site name and address;
- Permit holder;
- Permit number;

- Emergency contact name and telephone number;
- EA national telephone numbers; and
- Days and hours site is open to receive waste.

4.5.2 Plant and Equipment

The following items of plant and equipment are held on site. This is not a fixed list of plant:

- Tele handler;
- Loading shovel; and
- Wheeled material handler.

Additional plant and equipment are made available as required.

All items of plant and equipment used on site are maintained in accordance with manufacturer's recommendations.

4.5.3 Plant Maintenance

All maintenance audits and monitoring is carried out in accordance with the manufacturer's specifications which are kept in the site office or available online.

Envar take a proactive approach involving a planned preventative maintenance program for the site. A Maintenance Checklist allows all site operatives to actively take part in the site's maintenance schedule.

The checklist is completed and maintained by the Site Manager, with the following information compiled:

- The item that requires maintenance;
- How often maintenance needs to be carried out (daily, weekly, monthly or yearly);
- A record of any particular maintenance instructions; and
- Who on site is responsible for each maintenance check.

The checklist ensures that all site operatives are aware of their particular responsibilities for maintenance checking. The Site Manager ensures that all site operatives are aware of any amendments and additions to the checklist.

When a maintenance issue is dealt with, a maintenance record form is completed for each separate piece of equipment or infrastructure. The record form will include the following information to be recorded:

- The item requiring maintenance;
- The frequency of the required maintenance;
- Completed date and who carried out by; and
- Any particular comments.

The record forms will be kept in the site office to ensure there is access for all site operatives to the records.

In the event that plant replacement is required, Envar will choose new plant with the lowest emission standard available at the time of purchase.

The following control measures will be in place to reduce as much as possible during operations:

- Use of low sulphur fuel;
- Mobile plant to be switched off when not in use to avoid idling; and
- Planned, preventative maintenance schedule to be rigidly followed to avoid the operation of poor performing or inefficient plant.

4.5.4 Site Infrastructure Requirements

Excessive, or additional site infrastructure including a fully impermeable surface is not considered to be required for the following reasons:

- Green waste bulking, storage, and transfer operations on site are currently carried out under a T6 Waste Exemption. There is no change proposed to the existing waste activities at the site as a result of the EP application, and the only activities carried out on site will continue to be bulking up, and transfer of green waste. It is not considered that the proposed EP application will increase the risk of the site, and as the activities are currently carried out under an exemption which does not require a fully impermeable surface additional infrastructure is not considered to be required;
- The site is currently leased from Surrey County Council who are in the process of applying for planning permission for a new large Materials Recycling Facility (MRF) on the site, and therefore Envar will only likely be able to operate from the site for 2-3 years. Due to the short term availability of the site, it is not considered necessary for the site to install additional infrastructure;
- Waste storage volumes will be minimal, with a maximum of 500 tonnes of un-shredded green waste stored on site at any one time with a maximum annual throughput of 35,000 tpa;
- Waste storage times will be short and limited to a maximum of 5 days. During spring, summer and autumn, waste will typically be removed within 48 hours; and
- The site will only accept household green waste with a limited proposed waste list of two EWC codes.

5.0 Waste Pre-Acceptance, Acceptance and Tracking

Strict WAP are followed at the site to ensure that the site only accepts waste that is:

- Suitable for the activity;
- Allowed by the EP; and
- Appropriately considered by the ERA.

The WAP also assists with:

- Ensuring the activities do not cause pollution;
- The waste sourcing decision making process; and
- Preventing the receipt of non-permitted wastes.

The site will accept up to 35,000 tpa of un-shredded green waste collected from Surrey residents. A maximum of 500 tonnes of waste will be stored on site at any one time.

The Site Manager is responsible for ensuring that WAP are implemented and followed on site by all site operatives, and contractors.

5.1 Waste Pre-Acceptance

The site only accepts un-shredded household green waste collected from Surrey residents, and local gardeners.

The site implements strict waste pre-acceptance procedures to ensure that enough is known about a waste (including its composition) before it arrives at the site. The procedure is required to assess and confirm that the waste is technically and legally suitable for acceptance. The procedure will follow a risk-based approach considering:

- The source and nature of the waste; and
- Potential risks to process safety, occupational safety and the environment (for example from odour and other emissions).

The objective of the waste pre-acceptance procedure is to evaluate customer information at the enquiry stage to determine whether the waste could be accepted at the site.

The waste producer/holder will be required to send the necessary waste characterisation information to Envar in advance of delivery of waste materials to the site.

This information enables Envar to determine whether the waste stream can be accepted at the site.

No waste is accepted at the site unless the necessary characterisation information has been received in advance and approved for receipt.

Both new and existing customers are required to provide characterisation information for each new waste stream.

Enquiries for new waste streams proposed for acceptance at Chertsey Green WTS will be managed by Envar who will ensure that the waste has been properly assessed and classified in line with WM3[5]. The site management will ensure that the following waste characterisation information is obtained:

- A description of the waste;

[5] Waste classification technical guidance - GOV.UK (www.gov.uk)

- The waste classification code;
- Information on the nature and variability of the waste production process;
- The waste's physical form;
- A description of the waste's odour and whether it is likely to be odorous; and
- An estimate of the quantity expected to be received in each load.

Following classification in line with WM3, the waste will be technically assessed to ensure it is suitable for acceptance and storage on site, and meet EP conditions.

Waste pre-acceptance records will be kept for at least 3 years and information will be reassessed if the:

- Waste changes;
- Process giving rise to the waste changes; or
- Waste received does not conform to the pre-acceptance information.

Parameters to be checked at the acceptance stage will be determined when the acceptance of waste has been agreed with a customer.

5.2 Waste Acceptance

The site implements WAP to check that the characteristics of the waste received matches the information provided during waste pre-acceptance. This will ensure the waste is as expected and that it can be accepted at the site. The Site Manager is responsible for overseeing waste acceptance, to ensure that procedures are followed by all site operatives and contractors on site.

The procedure follows a risk-based approach considering:

- The source, nature and age of the waste;
- Potential risks to the process safety, occupational safety and environment;
- The potential for self-heating; and
- Knowledge about the previous waste holder(s).

All vehicles bringing waste material to the site report to the site entrance for visual inspection at the point of delivery. Following this the load will be tipped at the front of the site where it will be visually inspected for a second time, before being pushed up towards the back wall. Visual inspection confirms the waste's description and composition against relevant accompanying documentation.

Waste is only accepted, and stored at the site if the description on the accompanying documentation is in accordance with the EP and that onsite inspection confirms the waste is consistent with the description provided.

Should the wastes be found not to conform during the visual inspection, then the details will be recorded, and the waste will be removed to the designated quarantine area as appropriate. Rejected waste will be stored in the quarantine area for a maximum of 7 days. Higher risk materials stored in the quarantine area will be removed as soon as practicable.

The records of non-compliant waste received at the site will include details on:

- The quantity;
- Characteristics;
- Origin;

- Delivery date and time; and
- The identity of the producer and carrier.

Waste is not accepted unless the site is adequately resourced to receive the waste.

The quantity of waste accepted and despatched from the facility will be calculated by recording the volume of waste entering the site and the application of standard EA conversion factors as appropriate or via the weighbridge located outside of the EP boundary.

A record will be kept in the site diary of all rejected wastes. In the event of non-conformance, the waste producer and the EA will be notified.

5.3 Quarantine

The quarantine and rejection procedures ensure that all non-conforming waste is removed from the site and that the waste producer and carrier are informed so that appropriate action can be taken to prevent recurrence.

Non-conforming waste will be identified by site operatives during visual inspection of the waste. Non-conforming waste will be identified by visual and olfactory means.

If unauthorised waste is identified it will be moved to a designated quarantine area, the location of which is illustrated on Drawing 002. The quarantine area will be utilised for the segregation and isolation of any non-conforming waste identified. The area will be clearly marked as the quarantine area.

Non-conforming waste will be stored in the quarantine area for a maximum of 7 days, prior to export from site to a suitably permitted alternative facility. Higher risk materials stored in the quarantine area will be removed as soon as practicable.

The maximum storage volume of waste in the area will be 50% of the largest waste stockpile on site. The site will have procedures for dealing with non-conforming waste including the maximum storage time for waste in the area. If the waste has the potential to be odorous or attract pests, it will be removed from site within 24 hours to a suitably licenced facility. Burnt waste will be removed from site within a maximum of 48 hours.

5.4 Waste Tracking

The quantity of waste accepted and despatched from the facility is measured via the weighbridge.

A register of the quantities and characteristics of waste accepted at the site is maintained on a bespoke waste management computerised software. The bespoke system includes the following information:

- Pre-acceptance;
- Acceptance;
- Non-conformance or rejection;
- Storage;
- Repackaging;
- Treatment; and
- Removal off site.

The system also forms the waste inventory and stock control system, including the following information as a minimum:

- The date the waste arrived on site;

- 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 process;
- 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; and
- Details of any non-conformances and rejections, including consignment notes for waste rejected because it is hazardous.

The system is able to report on the following for each LoW code:

- The total quantity of waste present on site at any one time;
- A breakdown of the waste quantities stored 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 the management system and permit; and
- The length of time the waste has been on site compared with the limits in the management system and permit.

Waste acceptance records will be kept for a minimum of 2 years once the waste has been removed from site.

6.0 Waste Storage

Waste is stored on site in accordance with the site layout illustrated on Drawing 002. Waste is stored externally in two large separate stockpiles (max 250 tonnes each). The back of the site benefits from push walls which extend partially down the two sides. Green waste is tipped out at the front of the site before being pushed up towards the back wall. The site operates on a rolling basis where waste is tipped out at the left and then to the right, and stored within the two designated stockpiles. Due to the nature of the accepted waste (contract un-shredded green waste), it is anticipated that during the working day, the reception waste stockpile will exceed the EA's FPP guidance as multiple vehicles may arrive in a short space of time. The waste will be processed during operational hours and operatives will ensure that the stockpiles are reduced in size, in accordance with the EA's FPP guidance and that they are separated by a minimum distance of 6m before each shift finishes.

The following summarises the key waste storage measures adopted on site:

- Waste is stored in locations that minimise the unnecessary handling of waste;
- Waste handling is carried out by competent staff using appropriate equipment;
- The maximum storage capacity for the site is 500 tonnes. The quantity of stored waste is monitored against the allowed maximum capacities;
- The site operates on a rolling basis where it is tipped out at the left and then the right. All waste is stored for a maximum of 5 days, however during Spring, Summer and Autumn (March to November) waste will typically be removed rom site within 48 hours. Waste will be prioritised for removal off site based on the follows:
    - Its type;
    - Its age on arrival;
    - The date of arrival; and
    - The duration of storage on site.
- Waste is removed from site on a first-in-first-out basis unless more recently received wastes are prioritised because they pose a higher risk of pollution;
- Storage areas benefit from daily cleaning using pressure washer and a sweeper attachment as required; and
- Any spillages will be cleared and logged in the site diary immediately.

Table 6-1 below details the waste storage arrangements for all waste types accepted on site.

Non-waste material types are shaded grey in the table below and are included for completeness but are not covered by the EA's Guidance or jurisdiction.

Table 6-1 Waste Storage Arrangements

Waste Type	Storage Arrangement	Permitted storage time	Length (m)	Width (m)	Height (m)	Volume (m^3)
Green Waste	2 x Loose stockpiles	7 days	15	12.5	4	750 (250 tonnes)
Untreated Virgin Logs	1 x Bay	N/A	14.5	10.5	4	N/A

Waste Type	Storage Arrangement	Permitted storage time	Length (m)	Width (m)	Height (m)	Volume (m^3)
Untreated Virgin Wood Chip	1 x Bay	N/A	14.5	10.5	4	N/A
PAS100 Compost	1 x Bay	N/A	14.5	10.5	4	N/A

7.0 Waste Treatment

The site currently operates a green waste bulking and transfer operation under a T6 Waste Exemption. The conditions of the T6 waste exemption are due to change which will reduce the waste storage limits below what is commercially viable for this site. Therefore, Envar wish to apply for a bespoke EP to facilitate the continued green waste bulking and transfer operations at the site. There will be no change to the existing waste activities at the site as a result of the EP application.

The only waste activities to be undertaken on site will continue to be the bulking up, storage, and transfer of household green waste.

7.1 Waste Treatment Outputs, Including Fines

There will be no waste treatment undertaken on site, apart from the bulking up, storage, and transfer of household green waste.

8.0 Emissions Control

8.1 Enclosure within Buildings

All waste activities will continue to take place externally as illustrated on Drawing 002. This is considered appropriate due to the very low risk nature of the activity, and the current regulation under the T6 Waste Exemption.

8.2 Point Source Emissions to Air

The site will be operated so that there are no point source emissions to air.

8.3 Fugitive Emissions to Air

8.3.1 Odour

From operator experience, current operations on site do not generate significant odours and therefore it is not anticipated that odour will be generated as a result of the proposed permitted activities.

The site will continue to be operated so as to minimise odour emissions from the site. Measures taken at the site include:

- The site only accepts a limited number of household green waste EWC codes which have a low odour potential;
- Strict WAP are adhered to, to ensure only permitted wastes are accepted on site;
- A relatively small quantity of green waste is stored on site at any one time (maximum 500 tonnes);
- Green waste is stored on site for minimal periods of time (a maximum of 5 days). During spring, summer, and autumn waste is typically removed from site within 48 hours;
- Waste is delivered to site in enclosed 6-8 tonne RCVs;
- No waste treatment is undertaken, only storage and bulking up prior to transfer to suitably permitted composting sites for further treatment.

The site is monitored for odours by site personnel throughout the working week. If significant odours are detected, investigations will be undertaken to determine the cause and appropriate remedial action taken.

8.3.2 Dust

Current operations on site do not generate significant emissions of dust and therefore it is not anticipated that dust emissions will be generated as a result of the proposed permitted activities.

The site will continue to be operated so as to minimise dust emissions from the site, in accordance with the DEMP. Measures taken at the site include:

- The site only accepts a limited number of household green waste EWC codes which have a relatively low dust potential;
- Strict WAP are followed to ensure only permitted wastes are accepted on site;
- A relatively small quantity of green waste is stored on site at any one time (maximum of 500 tonnes);

- Green waste is stored on site for minimal periods of time (maximum 5 days), and during spring, summer and autumn waste is typically removed within 48 hours;
- No waste treatment is undertaken on site, only storage and bulking up prior to transfer to suitably permitted composting sites for further treatment;
- Speed limits are implemented for vehicles using the site;
- Drop heights at which materials are handled are reduced wherever possible;
- Site access roads and operational areas are maintained and repaired to minimise emissions of dust due to poor surfacing;
- The site operates good housekeeping measures. Roads and operational areas are cleaned as necessary to reduce dust emissions;
- 6-8 tonne RCVs delivering green waste to the site are enclosed to minimise emissions of dust;
- All incoming waste is offloaded near the storage areas to minimise unnecessary handling and transport distance therefore minimising the potential for wind-borne dust;
- Drop heights are minimised wherever possible to prevent emissions of dust.

Daily visual monitoring is carried out by all members of staff throughout their shift with any potential emissions of dust reported to the Site Manager. If significant dust emissions are detected, investigations will be undertaken to determine the cause and appropriate remedial action taken.

8.3.3 Noise

Current operations on site do not generate significant noise emissions, and therefore it is not anticipated that noise emissions will be generated as a result of the permitted activities.

The site's existing noise mitigation and management measures are considered to be effective and will continue to be implemented on site, as follows:

- Site operations are restricted to reasonably sociable hours between 07.00 and 17.00 Monday to Friday. To ensure continuity of service, the site would occasionally be operational on Saturdays, and Sundays, public holidays and over the Christmas and New Year period;
- A relatively minimal annual throughput of up to 35,000 tpa of green waste is accepted on site;
- No waste treatment is undertaken, only storage and bulking up prior to transfer to suitably permitted composting sites for further treatment;
- All plant will be switched off when not in use;
- Plant is selected and operated to minimise noise. All site plant and machinery are operated and maintained in accordance with manufacturer's specifications;
- If horns or alarms on site plant or infrastructure or delivery vehicles are deemed to cause unacceptably high levels of noise, alternative technologies will be explored and implemented;
- Speed limits will continue to be implemented for vehicles using the site; and
- Site access and operational areas are maintained and repaired to minimise emissions of noise due to uneven and poor surfacing.

Auditory inspections are carried out daily and in response to complaints.

Any complaint received will be logged in the site diary. The Site Manager will investigate the complaint and will take action to identify the source of the noise and implement remedial measures where appropriate.

8.3.4 Litter

From operator experience, current activities on site do not generate litter and therefore it is not anticipated that litter will be generated as a result of the proposed permitted activities:

- The site only accepts a limited number of household green waste EWC codes which do not generate litter;
- Strict WAP ensure that only authorised wastes are accepted;
- A relatively small quantity of green waste is stored on site at any one time (maximum 500 tonnes), and the site has a minimal maximum annual throughput of 35,000 tpa;
- Green waste is delivered to site in 6-8 tonne enclosed RCVs;
- All vehicles leaving site are inspected to ensure that they are clear of loose waste; and
- No waste treatment is undertaken, only storage and bulking up prior to transfer to suitably permitted composting sites for further treatment, limiting the likelihood of litter generation.

The site and its' immediate surroundings are inspected on a daily basis and action will be taken to maintain the area free of significant accumulations of litter and debris.

If any excessive litter material is identified at the facility or on the road it will be cleared using a mechanical sweeper and/or a litter picker if required.

8.3.5 Mud and Debris

Current operations on site do not deposit mud, and therefore it is not anticipated that mud will be deposited as a result of the proposed activities.

The following management techniques are employed at the site, to ensure that the risk of mud track out is minimised:

- Green waste is delivered to site in 6-8 tonne enclosed RCVs;
- Areas of surfacing are maintained free of significant quantities of mud and debris; and
- Roads are swept and cleaned whenever necessary.

In the event that mud, debris or waste arising from the site is deposited outside of the site, the affected area will be cleaned, and traffic will be isolated from sources of mud and debris within the site.

Daily visual inspection of the site by Site Operatives will identify any problem with mud which will be cleaned up as soon as possible. Where necessary road cleaning equipment will be deployed.

8.4 Point Source Emissions to Water (Including Sewer)

There will be no point source emissions to surface water, groundwater, or sewer from the waste operations on site.

8.5 Fugitive Emissions to Land and Water

The site will be operated to prevent fugitive emissions to land and water.

8.5.1 Site Drainage

The site currently operates under a T6 waste exemption and carried out green waste storage and bulking up operations prior to transfer to suitably permitted composting sites for further treatment. Additional site infrastructure including a fully impermeable surface is not considered to be required for the following reasons:

- There is no change proposed to on site waste activities which are currently regulated under a T6 waste exemption. It is not considered that the proposed EP application will increase the risk of the site, as the exemption does not require a fully impermeable surface;
- Waste storage volumes are minimal with a maximum of 500 tonnes of green waste stored on site at any one time and a maximum annual throughput of 35,000 tpa;
- Waste storage times will continue to be short and limited to a maximum of 5 days however during spring, summer, and autumn waste is typically removed from site within 48 hours;
- The site only accepts household green waste with a limited proposed waste list of two low risk EWC codes; and
- Strict WAP are implemented to ensure only permitted wastes are accepted on site.

All operational areas will be inspected to ensure fitness for purpose of their construction is maintained at all times.

8.5.2 Containment Bunding

Fuel and oil tanks stored on site will be surrounded by a leakage containment bund capable of containing at least 110% of the volume of the largest container within the bund.

8.6 Pests

Current operations on site do not attract pests and it is therefore not anticipated that pests will be attracted as a result of the permitted activities.

The following management techniques are employed at the site, to ensure that the risk of pests is minimised:

- Timeframes for the storage of green waste will continue to be as low as practically possible, and all waste is stored for a maximum of 5 days. During spring, summer, and autumn green waste is typically removed from site within 48 hours;
- The site only accepts a limited number of household green waste EWC codes which are unlikely to attract pests;
- Stric WAP are implemented to ensure only authorised wastes are accepted. In the event that non-conforming wastes are delivered to site, they will be isolated and removed from site at the earliest opportunity;
- A relatively small quantity of green waste is stored on site at any one time (maximum of 500 tonnes), and the site has a minimal maximum annual throughput of 35,000 tpa;
- Green waste is delivered to site in enclosed 6-8 tonne RCVs; and
- No waste treatment is undertaken, only storage and bulking up prior to transfer to suitably permitted composting sites for further treatment.

In the event that birds, vermin or insects are identified at the site, a specialist pest control contractor will be employed to undertake remedial measures.

9.0 Information

All relevant notifications and submissions to the EA regarding the site will be made in writing and quote the EP reference number and the name of the EP holder.

Records will be maintained for at least six years, however in the case of off-site environmental effects, and matters which affect the condition of land and groundwater, the records are to be kept until EP surrender. Duty of Care records will be kept for a minimum of two years.

9.1 Reporting and Notifications

9.1.1 Changes in Technically Competent Persons

The EA will be informed in writing of any changes in the technically competent management of the site and the name of any incoming person, together with evidence that such person has the required technical competence.

9.1.2 Waste Types and Quantities

A summary report of waste types and quantities accepted and removed from the site for each quarter, will be submitted to the EA within one month of the end of the quarter unless otherwise required by the permit conditions.

9.1.3 Relevant Convictions

The EA will be notified of the following events:

- Envar being convicted of any relevant offence; and
- Any appeal against a conviction for a relevant offence and the results of such an appeal.

9.1.4 Notification of Change of Operator's or Holder's Details

The EA will be notified of the following:

- Any change in the operator's trading name, registered name or registered office address; and
- Any steps taken with a view to the company going into administration, entering into a company voluntary arrangement or being wound up.

9.1.5 Adverse Effects

The EA must be notified without delay following the detection of the following:

- Any malfunction, breakdown or failure of equipment or techniques;
- Any accident;
- Fugitive emissions which have caused, is causing or may cause significant pollution; and
- Any significant adverse environmental and health effect.