BAT ASSESSMENT

C O'Donovan & Sons Ltd

11 -13 Ashfield Way

Whitehall Industrial Estate

Leeds

LS12 5JB

Version 1.0 March 2026

SJW Enviro Consulting Ltd

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1.0 INTRODUCTION

1.1 Overview of site operations

1.1.1 This document summarises the best available techniques (BAT) specific to operations undertaken by C O'Donovan & Sons Ltd (the operator) at their site situated at Ashfield Way, Whitehall Industrial Estate, Leeds, West Yorkshire, LS12 5JB

1.1.2 The current Environmental Permit (EP) ref. EPR/KB3500FS authorises operations associated with the following:

- Physical and chemical treatment of waste
- Waste transfer

1.1.3 This BAT assessment has been prepared to accompany a permit variation application. The changes proposed as part of the variation include the following:

- To increase the hazardous waste storage capacity to 100 tonnes at any one time which will fall under an installation activity in accordance with Section 5.6 Part A(1)(a) – Temporary or underground storage of hazardous waste
- To increase the hazardous waste treatment capacity to 100 tonnes per day

1.1.4 As the operator is looking to treat more than 10 tonnes per day of hazardous waste and store more than 50 tonnes of hazardous waste at any one time, the site will form part of the Industrial Emissions Directive (IED) Regulations which leads to the requirement for this BAT assessment

1.1.5 SJW Enviro Consulting Ltd has been employed as consultants for C O'Donovan & Sons Ltd to produce the BAT assessment for this facility. Contact details are as follows:

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West Yorkshire
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1.2 BAT Techniques

1.2.1 The following best available techniques BAT's have been considered to show how the site addresses the aspects detailed in the aforementioned guidance to include and therefore to ensure protection of the environment and surrounding receptors:

- Pre-acceptance of waste procedures
- Acceptance of waste procedures
- Waste storage
- Staff training
- Monitoring procedures
- Accidents and incidents

1.2.2 The primary purpose of this document is to ensure that all waste received is handled and treated in the most environmentally friendly and economical way to reduce fugitive emissions which could cause harm to the environment and human health.

1.3 Guidance

1.3.1 This BAT assessment has been written to demonstrate compliance with the following document:

1.3.2 Commission Implementing Decision (EU) 2018/1147 of 10 August 2018 establishing best available techniques (BAT) conclusions for waste treatment, under Directive 2010/75/EU of the European Parliament and of the Council

2.0 BAT COMPLIANCE

2.1 BAT 1 – Application and implementation of an Environmental Management System

2.1.1 The operator implements the requirements of a comprehensive Environmental Management System (EMS). The EMS has been revised for the purpose of this application and the additional activities and changes proposed. The EMS has been prepared in accordance with the following guidance:

- The Environmental Permitting (England and Wales) (Amendment) Regulations 2018
- Develop a management system: environmental permits
- Technical Guidance WM3: Waste classification – Guidance on the classification and assessment of waste
- The Waste duty of care: code of practice – 2018
- Non-hazardous and inert waste: appropriate measures for permitted facilities published 12/07/2021
- Chemical waste: appropriate measures for permitted facilities published 18/11/2020
- Climate change: risk assessment and adaption planning in your management system

2.1.2 Therefore, in accordance with the above implementation of the EMS provides compliance with BAT 1.

2.1.3 A copy of the EMS implemented at the site has been submitted with this application

2.2 BAT 2 - Waste stream management

2.2.1 The EMS implemented by the operator contains site specific procedures and measures. Details of the relevant procedures and measures are summarised below:

a) Waste Pre acceptance procedures: All incoming waste is subject to a pre-acceptance review prior to arrival. Waste producers complete a waste transfer or hazardous waste consignment note detailing waste quantities, packaging, physical condition and chemistry. Further details of waste pre-acceptance are included in the EMS, section 3.1

b) Waste acceptance procedures: The EMS contains waste acceptance procedures which provide detail of the information including details of the waste transfer or hazardous waste consignment note that needs to be checked before accepting and depositing a load on site. If it is suspected that any incoming wastes are not coded correctly the incoming waste will be quarantined pending removal from site for treatment at a suitably permitted facility if necessary. As part of the waste acceptance procedure loads are visually inspected, any discrepancies result in waste being quarantined and investigated before further handling. Additional information on waste acceptance can be found in the EMS, section 3.2

c) Waste storage: The EMS contains a waste storage procedure which details the storage locations, types and quantities on site. Each waste type is stored in its own area to ensure segregation and no mixing with other waste.

2.2.2 By implementing acceptance and storage procedures, the facility fully complies with BAT 2. For specific details of these procedures please see the full EMS, document reference EMS Version 4.0 Dec 25.

2.3 BAT 3 – Reduction of emissions to water and air

2.3.1 There are no wastewater or gas streams produced as part of this operation

2.4 BAT 4 – Reducing environmental risk associated with waste storage

2.4.1 The storage locations of waste on site have been designed and optimised to prevent any unnecessary double handling and transport of wastes around the site. The storage locations and maximum waste storage capacities are clearly established and outlined within the operators EMS and other management systems

2.4.2 Waste storage areas are continually monitored to ensure they are not exceeding capacity

2.4.3 The aim of the operation is to follow a 'first in, first out' principle where incoming waste is sorted and processed on arrival to arrange for its export off site as soon as practicably possible, to minimise over-stocking.

2.4.4 Once processed waste will be stored by chemistry in appropriate storage containers to eliminate the risk of cross-contamination. Hazardous wastes will be placed into containers in the dedicated storage areas.

2.4.5 The EMS contains a waste storage procedure which provides an illustration of the waste storage areas including types and capacity of waste to be stored.

2.5 BAT 5 – Reducing environmental risk associated with handling and transfer of waste

2.5.1 The EMS contains specific procedures relating to the handling and transfer of wastes. Wastes will only be handled and transferred by members of staff who are suitably trained and qualified. Appropriate training will be provided to all members of staff responsible for handling and transferring of wastes. Training records will be retained on site.

2.5.2 Measures are taken to prevent spills; the EMS contains a spill procedure which outlines details of the remediation and what to do in the event of a spill. Any spillage will be cleared immediately by depositing sand or absorbents on the affected area. The sand or absorbents will be placed in a container to be taken to a suitably permitted facility for disposal. All site surfaces will be inspected daily when the site is in operation. Debris will be swept as required and placed in a skip for disposal to a suitably permitted facility.

2.6 BAT 6 & 7 – Monitoring emissions to water

2.6.1 Surface water from the external yard of the site is captured and contained within an underground tank on site. No surface water will leave or be discharged from the site which is surfaced and bunded throughout. Consequently, it is not considered that BAT 6 & 7 are applicable

2.7 BAT 8 – Monitoring emissions to air

2.7.1 There are no channelled emissions to air from site operations and therefore BAT 8 is not considered applicable.

2.8 BAT 9 – Monitoring diffuse emissions of organic compounds

2.8.1 The operator does not propose to undergo physio-chemical treatment of solvents for the recovery of there calorific value and therefore BAT 9 is not considered applicable

2.9 BAT 10 – Monitoring odour emissions

2.9.1 The operator will implement the monitoring requirements of the odour management plan, reference number Version 2.2 March 2026

2.9.2 The frequency of odour monitoring is described in the odour management plan for the site

2.10 BAT 11 – Monitoring annual consumption of water, energy, raw materials and annual generation of residues and waste water

2.10.1 The operator will maintain records of water, energy and raw material consumption, in addition to generation of residues and water as specified on the determined EP.

2.11 BAT 12 – Odour management plan

2.11.1 The operator will implement the requirements of the odour management plan for the site. The odour management plan contains details of actions, timelines, monitoring and dealing with complaints and incidents.

2.12 BAT 13 – Reducing odour emissions

2.12.1 Methods for the reduction in odour emissions from the site are contained within Section 4 of the odour management plan version 2.2 March 2026 for the site which was submitted with this application.

2.13 BAT 14 – Diffuse emissions to air

2.13.1 The operator will implement the requirements of a dust and emissions management plan for the site. A combination of techniques a, d, e, f, g of BAT 14 are implemented on site via the following:

- Reduction in drop heights of material
- Reduced speed limit on site
- Dampening of external surfaces to prevent the resuspension of dust from vehicle movements
- Regular maintenance of plant and equipment in accordance with the manufacturer's guidance
- Cleaning of waste treatment and storage areas on a daily basis.

2.13.2 Further information is given in the dust and emissions management plan for the site.

2.13.3 All treatment of waste materials including washing, shredding and cutting take place within the buildings on site. The external yard areas are used for storage only.

2.14 BAT 15 & 16 – Use of flaring

2.14.1 No flaring is used on site and therefore BAT 15 & 16 are not considered applicable.

2.15 BAT 17 – Noise and vibration management plan

2.15.1 The Environment Agency have not requested a noise impact assessment or a noise management plan therefore BAT 17 is not considered applicable.

2.16 BAT 18 – Noise and vibration emissions

2.16.1 The operator has taken noise and vibration emissions into account when planning the appropriate location of plant and mechanical processing operations. All mechanical operations are undertaken within an enclosed building to use the building structure as noise screens.

2.16.2 All plant and equipment will be appropriately maintained in accordance with manufacturers recommendations

2.16.3 Plant and equipment is only allowed to be operated by sufficiently experienced and trained personnel.

2.16.4 As part of the site managers daily check on odour and dust emissions potential noise pollution is also monitored for.

2.17 BAT 19 – Water consumption

2.17.1 Water is used for the washing of IBC's, drums and other containers as well as for dust suppression purposes.

2.17.2 The drainage system and interceptors on site collect wash water from within the buildings and surface water from the external yard areas.

2.17.3 In order to reduce water consumption rainwater from the roofs of the buildings is collected and used for dust suppression.

2.18 BAT 20 – Reducing emissions to water

2.18.1 No surface water is discharged from site. The operator has installed an underground tank to capture liquid run-off from the external yard areas which are fully surfaced and bunded.

2.18.2 All potentially contaminated water from the drum washing process is retained within a sump in the building and is removed from site to be treated and discharged to sewer via a consent from Yorkshire Water.

2.19 BAT 21- Preventing or limiting environmental consequences of accidents and incidents

2.19.1 The EMS and other management plans implemented contain procedures relating to potential accidents that could occur on site and provides mitigation measures and responses through other related procedures. Some examples of such and how these comply with BAT 21 are provided below:

- The operator has an accident logbook on site where accidents and incidents are recorded, this is outlined in the EMS procedures.
- The EMS has procedures relating to protection measures such as site security to prevent unauthorised access and incidents as a subsequent to this
- The EMS contains procedures relating to breakdowns and spillages and what to do in the event of these
- Following an accident or incident the operator will perform an investigation to interpret the cause of the accident or incident and provide additional training to staff if required.

2.20 BAT 22 – Material efficiency

2.20.1 A list of all the raw materials used on site including their properties will be maintained. The list of raw material will be reviewed annually, as part of this review it will be considered whether the raw materials can be substituted or changed to alternative materials such as waste or waste derived products.

2.20.2 At present the operator uses a limited range of raw materials on site which includes, diesel, electricity and water.

2.21 BAT 23 – Energy efficiency

2.21.1`The main energy used on site is in the form of electricity and diesel for lighting, processing plant, operating equipment and transport to and from the site.

2.21.2 The operator records and analyses all energy use and has policies and procedures in place which emphasise the need to avoid unnecessary use and to identify saving efficiencies, meeting the requirements of BAT 23.

2.22 BAT 24 – Reducing quantity of waste sent for disposal

2.22.1 All washed plastic containers that are no longer viable and shredded on site and the plastic is sold for recycling. Some empty drums and IBC's are re-used to collect liquid residues from nominally empty containers for disposal.

2.22.2 Metal IBC cages that can not be reused are cut up and sold to a suitably permitted scrap metal dealer in the Leeds area.

2.22.3 By reusing packaging as outlined above the site is compliant with BAT 24.

2.23 BAT 25 – Reducing emissions to air of dust

2.23.1 A dust and emissions management plan is implemented on site which provides further details of mitigation measures and was submitted with this application.

2.24 BAT 26, 27 & 28 – Shredding metal waste

2.24.1 BAT 26,27 & 28 are not considered applicable as the operator does not propose to shred metal waste.

2.25 BAT 29 & 30 – Treatment of WEEE containing VFC's and/or VHC's

2.25.1 BAT 29 & 30 are not considered applicable as the operate does not propose to treat WEEE.

2.26 BAT 31 & 32 – Emissions to air of organic compounds and mercury

2.26.1 BAT 31 & 32 are not considered applicable as the operator does not discharge to air organic compounds or mercury.

2.27 BAT 33, 34 & 35 – Biological treatment of waste

2.27.1 BAT 33, 34 & 35 are not considered applicable as the operator does not undertake any biological treatment of waste.

2.28 BAT 36 & 37 – Aerobic treatment of waste

2.28.1 BAT 36 & 37 are not considered applicable as the operator does not undertake any aerobic treatment of waste

2.29 BAT 38 – Anaerobic treatment of waste

2.29.1 BAT 38 is not considered applicable as the operator does not undertake any anaerobic treatment of waste

2.30 BAT 39 – Mechanical biological treatment of waste

2.30.1 BAT 39 is not considered applicable as the operator does not undertake any mechanical biological treatment of waste.

2.31 BAT 40 – Overall environmental performance of physio-chemical treatment of waste

2.31.1 All waste arriving at the site has had pre-acceptance checks completed and the material has been accepted as suitable for the site. As part of the pre-acceptance checks the chemical composition of the waste is identified.

Records of the type of quantity of material accepted at the site are maintained which allows for an accurate record of the quantities of each type of material accepted.

2.31.2 Different waste types are not mixed together on site.