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Appropriate Measures Assessment

v2.0

Environmental and sustainability solutions provided to

Waste Organics (Leeds) Limited

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1.0 INTRODUCTION

1.1 Context and Purpose

Walker Resource Management Limited (WRM) have been commissioned by Waste Organics (Leeds) Limited (hereon referred to as Waste Organics) to undertake an Appropriate Measures Assessment for the treatment of waste at their Waste Treatment Station, located on Knowsthorpe Road, Leeds, LS9 0NX ('the site'). This assessment has been undertaken by WRM to support Waste Organics' permit variation application, and forms part of the wider Environmental Management System for the site.

Waste Organics are seeking to vary the environmental permit to allow them to add additional waste codes, suitable for supply into AD facilities, to the permit and to add a waste treatment activity to allow the treatment of biodegradable organic wastes to produce a "soup" of blended wastes suitable for feedstock to AD facilities. This Appropriate Measures Assessment forms a key part of the Permit Application. It addresses how the authorised treatment facility will meet the requirements contained within the latest 'Biological waste treatment: appropriate measures for permitted facilities guidance'[1] published in 2022. Despite the fact that no biological treatment is undertaken on site, it was considered that this was the most appropriate guidance to follow on the basis of the types of waste to be accepted onto site and the fact that the "soup" will be transferred to AD facilities for further treatment. The activities will be undertaken in accordance with the appropriate measures as set out in the following sections of the guidance:

- Section 5 – General management;
- Section 6 – Waste pre-acceptance, acceptance and tracking;
- Section 7 – Waste storage, segregation, transfer and handling (Section 7.1, 7.5-7.7 only).
- Section 8 – Waste treatment (sections 8.1 to 8.4 only)
- Section 9 – Outputs (section 9.1 only)
- Section 11 – Emissions control (All sections excluding 11.7)
- Section 12 – Process efficiency (Section 12.2 only)

1.2 Assessment Process

As stated within the guidance, the measures that are suited to site depends on the activities carried out; the size and nature of the activities; and the location of the facility.

[1] https://www.gov.uk/guidance/biological-waste-treatment-appropriate-measures-for-permitted-facilities

The tables below present each of the relevant areas of appropriate measures and then assesses information from the relevant document of the Environmental Management System against the relevant appropriate measures and guidance. The Environmental Management System as well as other key documents, have been consulted with in order to undertake this Appropriate Measures Assessment.

2.0 ASSESSMENT

2.1 General Management

These are appropriate measures for the environmental management of a regulated facility permitted to store, treat or transfer (or both) wastes suitable for biological treatment.

Ref	5 - General management appropriate measures	Implementation
	5.1 - Management system	
1.	*The following measures apply to all processes and operations. You must have an up to date, written management system. The level of detail you need will be related to the size of your operation, site location and complexity. Your management system must aim to improve the overall environmental performance of the site.*	**1. <u>Adoption of a written management system</u>** Waste Organics have a written management system in place that implements and incorporates the following techniques and features to improve overall environmental performance. The Environmental Management System (EMS) (EPR-B01) comprises documents that are reviewed and updated on a per annum basis to continually improve the environmental performance of the installation.
2.	*You must have management commitment, including from senior managers (where applicable) to develop an environmental policy that is defined by senior managers (where applicable). This policy must include the continuous improvement of the facility's environmental performance, so you can identify pollution risks*	Site management will be actively involved in daily site operations and activities, leading in house training and taking responsibility of the EMS. Site Operatives who are involved in permitted activities will be trained on the EMS covering waste acceptance/rejection and handling and treatment activities. Training records will be maintained for each Site

Ref	5 - General management appropriate measures	Implementation
	and minimise them through appropriate measures and make best and most efficient use of resources. Your management system must also incorporate the features that follow.	Operative and will be updated on an annual basis, or as and when required. Site operations and permitted activities are detailed within the EMS for the Site. The existing EMS the following elements:
	3. You plan and establish the resources, procedures, objectives and targets needed for environmental performance alongside your financial planning and investment.	• EMS Permit Manual Document, including standard operating procedures, waste acceptance/rejection procedure, permit reporting procedure, monitoring procedure and recording procedure. • Climate Change Risk Assessment • Environmental Risk Assessment • Site Condition Report • Accident Management Plan • Fugitive Emissions Management Plan • Odour Management Plan • Containment and Drainage Plan.
	4. You implement your environmental performance procedures, paying particular attention to: • *staff structure and relevant responsibilities* • *staff recruitment, training, awareness and competence* • *communication (for example, of performance measures and targets)* *employee involvement*	The EMS will be reviewed on an annual basis, and the following aspects shall be evaluated, where applicable: • Review of the EMS and its continuing suitability, adequacy and effectiveness, including a review of pollution risk.

Ref	5 - General management appropriate measures	Implementation
	documentation *effective process control* *maintenance programmes* *emergency preparedness and response* *making sure you comply with environmental legislation* *5. You check environmental performance and take corrective or preventative action (or both), paying particular attention to:* • *monitoring and measurement* • *investigating and learning from incidents, near misses and mistakes including those of other organisations* • *records maintenance* • *independent (where practicable) internal or external auditing of the management system to confirm it has been properly implemented and maintained.*	• Following the development of cleaner technologies and application of benchmarking. **2. Senior Management Commitment to Environmental Performance** Waste Organics are committed towards the continual improvement of their environmental performance by the business; this is documented in their Environmental Policy. As part of the continuous improvement of the business, Senior Management attend annual management reviews. During this meeting several aspects of business performance are reviewed, which includes the implementation of the EMS and Environmental Policy. All relevant documents are produced or reviewed and authorised by a director to ensure that commitments can be implemented. **3. Meeting Environmental Performance Standards** The EMS is supported by several procedures to facilitate and structure progress in a number of areas of the business, alongside financial planning and investment matters. To guide improvements across the business, Waste Organics have in place a complaints procedure. The objective of this system is to ensure that all customer complaints, complaints about the site operations and/or its impact on the

Ref	5 - General management appropriate measures	Implementation
	6. Senior managers and or operators must periodically review the management system to check it is still suitable, adequate and effective. *7. You review the development of cleaner technologies and their applicability to site operations. The Environment Agency would expect you to consider cleaner technologies:* • *as a result of substantiated pollution incidents* • *when reviewing management systems* • *when planning investment decisions, for example new items of plant* *8. When designing new plant, you must assess the environmental impacts from the plant's operating life and eventual*	environment made by third parties are dealt with in a manner that ensures the operator acts in a responsible way and maximises customer satisfaction (customer complaint only). Also, to ensure that, as far as is practical, corrective and preventive action is taken to eliminate the causes and the potential causes of customer complaints, complaints about the site operations and/or its impact on the environment made by third parties. **4. Environmental Performance Procedures** Waste Organics have a number of procedures in place to ensure effective environmental performance of the business, as detailed below: *Organisation Structure, Training and Competency* Waste Organics have a clearly defined organisational structure to maintain control over the integrated and permit management system with the EMS, containing a dedicated 'Roles and Responsibilities' section to define key tasks that must be undertaken at different levels of the organisation. The operator has detailed their comprehensive approach towards upholding a good level of staff competency in the various sections titled Roles and Responsibilities within the EMS documents. These procedures detail a clear approach Waste Organics maintains to ensure that all members are competent within their roles and carrying

Ref	5 - General management appropriate measures	Implementation
	decommissioning. You must make sure that new plant is authorised by your environmental permit. *9. You must have a written procedure for proposing, considering and approving changes to procedures or infrastructure related to storing or treating waste or pollution control. This is so you can track and control the process of change.* *10. You consider the risks a changing climate presents to your operations and have appropriate contingency plans in place to assess and manage future risks.* *11. You compare your facility's performance against relevant sector guidance and standards on a regular basis, known as 'sectoral benchmarking'.*	out their role in a safe and responsible manner. The required training to satisfy the needs of each operator is provided either in house or via a third party and the training is recorded within individual training records and in the Waste Organics Training Matrix, which indicates when individual refresher training is due. Action is taken to ensure that personnel are aware of the relevance and importance of their activities and how they contribute to the achievement of the quality, environmental and health & safety objectives through informal conversations with site management. The key mechanisms within the training and competence process will be the company appraisal system, with the effectiveness of training to be reviewed within the annual Management Review. *Communication and Employee Involvement* Clear and coherent communication is fundamental to the effective process operation on site. Directors and Managers are responsible for ensuring that internal communications take place. Waste Organics communicate information using a variety of media, including, but not limited to team meetings, toolbox talks and training records, shared file server and notice boards. The electronic Shared File Server is the key method of communication and is updated on a regular basis.

Ref	5 - General management appropriate measures	Implementation
	12. You document and implement appropriate waste stream management. *13. You have and maintain a site condition report for installations. For waste facilities the Environment Agency recommends that you carry out a site condition assessment during the life of the site. You would need to carry out this assessment on surrender. Please read the guidance Environmental permitting: H5 site condition report.* *14. You have and maintain:* • *an inventory of waste water, waste gas streams or fugitive emissions* • *a product and residues management plan* • *an accident management plan* • *a site infrastructure plan*	*Effective Process Control* Waste Organics are able to maintain high levels of process control through the combination of various different operational procedures and monitoring of the SCADA system. The regular monitoring and measurement of site processes and any environmental impacts such as odour, noise, litter and pests are recorded and available for inspection, should it be requested. Waste Organics also conduct and record daily site checks to assess a number of variables including within the environmental permit documents, including, but not limited to site security, odour, litter, pests and drainage systems. The effectiveness of individual site procedures is regularly evaluated through various meetings, such as internal and external audits and management reviews. *Maintenance* As detailed within the EMS, Waste Organics operates a strict maintenance regime and equipment used is of sufficient capacity to allow down time for routine, maintenance, calibration and servicing as recommended by the manufacturer.

Ref	5 - General management appropriate measures	Implementation
	• *an odour management plan* • *a bioaerosol risk assessment and management plan* • *a fire prevention plan, if required* • *a noise and vibration management plan, if required* • *a pest management plan, if required* • *a dust, mud and litter management plan (emissions management plan) if required* • *a leak detection and repair plan, if required*	*Emergency Preparedness and Response* The operator's diligent approach to managing accidents onsite is documented within the site's Accident Management Plan, completed in line with Environment Agency requirements. This document lists key emergency contact details and has comprehensively evaluated a range of hazards and how they are monitored and mitigated on site. The Accident Management Plan is supported by a range of procedures, such as the Fugitive Emissions Management Plan, Odour Management Plan, Fire Prevention Plan, Containment and Drainage Plan and Environmental Risk Assessment to minimise the potential occurrence of accidents on site.
	By 'inventory' we mean a complete and detailed list of all waste water and waste gases produced, handled and treated by your process or plant. Where possible, for example from channelled emissions points (point-sources), your inventory must quantify characteristics such as: • *substance concentration*	*Safeguarding Compliance with Environmental Legislation* Waste Organics have developed an Environmental Legislation Register. The register includes the following subject groups: Air Pollution; Waste; Water; Planning; Health and Safety; Transport; Statutory Nuisance and Quality & Product Certification. This register will be reviewed and audited by Site Management. All procedures, monitoring spreadsheets and supporting documents include document control and are monitored within as part of the EMS.

Ref	5 - General management appropriate measures	Implementation
	• *load value and variability of each waste water and waste gas stream.*	**5. Environmental Performance and Corrective Action** Actions undertaken to measure environmental performance and the response procedure for undertaking corrective actions that may be required and documenting these are set out in the site's EMS system. **6. Review of site management systems** An annual management review of the EMS is undertaken by senior management, covering the implementation of it and overall compliance against the Environmental Permitting Regulations, Animal By-Product Regulations, and industry best practice. In addition, all management system documents are produced or at least reviewed and authorised by a Director of Waste Organics or his delegate, to ensure there are commitments written into the document can be implemented on site. **7. Review of Cleaner Technologies** Waste Organics commit to undertaking an review of cleaner technologies not less than annually, or as a result of substantiated pollution incidents. **8. Plant Design and Operation**

Ref	5 - General management appropriate measures	Implementation
		All plant shall be designed and operated in accordance with the biological waste treatment, appropriate measures for permitted facilities guidance document. **9. Change Control Procedure** The site has in place a written change control procedure for proposing, considering and approving changes procedures or infrastructure related to storing or treating waste or pollution control. This is set out in Document Reference: [Waste Organics – Change Control Procedure]. **10. Climate Change Risk Mitigation** The site has in place a Climate Change Risk Assessment to mitigate the risks of climate change insofar as possible. Please see EPR-C01 – Climate Change Risk Assessment. **11. Facility Performance and Benchmarking** The facility's performance shall be evaluated on an annual basis as a minimum, or, following a fundamental change in operation, whichever is soonest, and in accordance with relevant sector guidance and standards.

Ref	5 - General management appropriate measures	Implementation
		12. Waste Stream Management Process management for received waste streams is set out in site's EMS documentation. **13. Site Condition Report** The site has in place a Site Condition Report, produced as part of the Permit Transfer application. Please see EPR-A03 – Site Condition Report. **14. Inventory of Management Plans** The site has in place the following management plans: • Accident Management Plan; • Site Layout Plan and Site Location Plan; • Odour Management Plan; • Bioaerosol Risk Assessment; • Fire Prevention Plan; • Containment and Drainage Plan; and, • Fugitive Emissions Management Plan. • Noise Impact Assessment; and, • Noise Management Plan.

Ref	5 - General management appropriate measures	Implementation
		Leak Detection and Repair Plan: The site is undertaking the treatment of biodegradable organic wastes to produce a “soup” of blended biowastes suitable for AD to be transferred offsite. All “soup” leaving site is transferred to anaerobic digestion sites for further treatment. Waste Organics can confirm that the anaerobic digestion facilities receiving the waste soup will have a leak detection and repair plan in place.
	5.2 - Inspection, maintenance and monitoring	
	The following measures apply to all processes and operations. 1. *You must have a schedule of inspection, maintenance and monitoring programmes for all plant and equipment (including the impermeable surfacing and drainage systems).*	As detailed within the EMS, Waste Organics operates a strict maintenance regime and equipment used is of sufficient capacity to allow down time for routine maintenance, calibration and servicing as recommended by the manufacturer. Daily checks of various parts of the plant are undertaken across the site by the maintenance staff/site manager. The results of these checks are recorded on the daily check sheet and if any faults are identified they too are recorded on the daily issues raised record sheet. Routine maintenance is recorded, and in addition operator pre-use checks will be

Ref	5 - General management appropriate measures	Implementation
	2. *You must inspect, maintain and monitor plant, equipment and infrastructure in accordance with manufacturer or design guidelines.* 3. *Where manufacturers' guidelines are not available, or where you have modified them, you must provide evidence that there are sound reasons for not following these guidelines, and that you have a robust alternative.* 4. *You must be able to produce proof of all inspection and maintenance through records of maintenance and inspection when requested.* 5. *If the site is more complex (AD, IVC and MBT plants) you must do a Hazard and Operability Study (HAZOP) or a similar study or risk assessment.* 6. *You must consider stocking or holding a list of critical spare parts and chemicals. You must be able to procure and install spares without undue delay.*	completed to assess the general condition of the machines and identify any defects. The site holds a stock of critical spare parts that can be deployed if required. Furthermore, Waste Organics maintains a good relationship with a network of key equipment suppliers that can quickly supply any critical spares that may need to be stored offsite.

Ref	5 - General management appropriate measures	Implementation
	7. You must have a programme of review and consider design improvements which take into account future de-commissioning (for existing plants). These improvements may include: • *improving or replacing underground tanks and pipework – or proposing an inspection regime* • *installing secondary containment or instigating a suitable monitoring programme depending on the risks identified and the sensitivity of the potential receptors* • *inspecting, draining and cleaning out vessels and pipework (especially before decommission and before dismantling)* • *inspecting and reviewing lagoons to make sure there is no leakage or damage – you must consider the life*	

Ref	5 - General management appropriate measures	Implementation
	of the facility and any future decommissioning and clean up • *reviewing insulation – this should be easy to dismantle without producing dust or causing a hazard to staff and local receptors* • *using recyclable materials, taking into account operational or other environmental objectives*	
	5.3 - Staff Competence	
	The following measures apply to all processes and operations. *1. Your site must always be operated or monitored (or both) by an adequate number of staff who have appropriate qualifications or training (or both) and competence.* *2. If you operate a 24-hour process, for example an in vessel or AD facility you must have:*	1. The Waste Organics site is staffed by appropriately trained, qualified and competent individuals. A staff training matrix is in place at the site, and staff records are kept in accordance with the EMS. 2. The proposed biodegradable organic waste treatment to be undertaken at site is a 24-hour process with 6 members of staff on site at any one time. There is CCTV with monitoring by a security company and there are alarms on the SCADA system to identify issues to staff on site who will then elevate the issue as required. 3. Procedures relating to waste acceptance/rejection, processing and despatch are set out in the site's EMS documentation.

Ref	5 - General management appropriate measures	Implementation
	• *remote or telemetric systems in place to make sure an alarm would be raised in the event of an incident during unmanned hours* • *appropriate personnel on call to deal with such incidents* *3. You must adequately explain these procedures in your management system and make sure they are implemented.* *4. The design, installation and maintenance of infrastructure, plant and equipment must be carried out by competent people, including using CQA where appropriate.* *5. You must have appropriately qualified managers for your waste activity who are members of a government-approved technical competence scheme.*	4. The site's secondary containment system is designed in accordance with the CIRIA 736 – design of containment systems for the prevention of water pollution from industrial incidents. All plant and equipment are serviced and calibrated in accordance with manufacturer's recommendations, and by specialist third-party companies. 5. The site has in place a Technically Competent Manager – Alison Dring who is present on site for the required time each week (the 'attendance requirement') holds the required WAMITAB/CIWM certification.
	5.4 - Accident Management Plan	

Ref	5 - General management appropriate measures	Implementation
1	*As part of your written management system, you must have a plan for dealing with any incidents or accidents that could result in pollution, including near misses.*	The Accident Management Plan (AMP) (EPR-C02) identifies the risks within the recycling operations.
2	*Your accident management plan must identify the hazards, risk and mitigation measures that will protect the environment in the event of an accident or event.*	The following hazards have been identified as directly applicable to on-site operations: • *Inadequate waste acceptance procedures;* • *Fires arising from storage of fuel and waste;* • *Fuel leak from fuel tank or vehicles;* • *Overfilling of on-site storage bays;* • *Breach of site containment systems;* • *Failure of site infrastructure/mains services;* • *Failure to contain firewater;* • *Site security failures/vandalism/arson;* • *Fugitive emissions (Noise, Pests, Odour, Mud, Debris);* • *Pest management; and,* • *Mud & debris.*

Ref	5 - General management appropriate measures	Implementation
3	*Particular areas to consider may include:* *1. waste types and reactions of mixed waste* *2. transferring substances, for example filling (including overfilling) or emptying of vessels and containers, over pressure of vessels and pipework, blocked drains* *3. preventing incompatible substances coming into contact with each other* *4. failure of plant and equipment, for example storage tanks and pipework, or blocked drains* *5. failure of containment, for example bund failure or drainage sumps overfilling* *6. making the wrong connections in drains or other systems* *7. failure to contain firefighting water* *8. failure of abatement systems* *9. hazardous atmospheres in confined spaces* *10. failure of main services, for example power, steam or cooling water* *11. checking the composition of effluents before their emission* *12. vandalism and arson*	The site has the following risk mitigation measures in place to minimise risk to the environment in the event of an accident or incident occurring: 1. Appropriate segregation of all waste streams is undertaken on site. Biodegradable organic waste is received into a dedicated reception building, away from other material streams. 2. Transferring substances is only carried out in specific tasks and in specific areas, i.e., fuel filling, lubricating oil change/top up. 3. Biodegradable organic waste awaiting processing is stored in a dedicated storage area, which prevents incompatible substances from mixing with the waste. 4. Plant and equipment are subject to maintenance and servicing in line with manufacturer's recommendations. Storage tanks, pipework and the site drainage system are regularly inspected. 5. Bunds and any sumps / interceptor pits form part of the inspection program.

Ref	5 - General management appropriate measures	Implementation
	13. operator error *14. accessibility of control equipment in emergency situations* *15. extreme weather conditions, for example flooding or very high winds* *16. having a contingency arrangement to divert waste feedstock when your ability to spread outputs to land, or inject gas to grid, is limited*	6. The routing of drainage systems onsite are well understood. The site drainage system is marked on the site plan. 7. The site has in place a Fire Prevention Plan (EPR-XXX), which sets out the measures in place for the containment of firefighting water. 8. The site has in place a robust inspection and maintenance procedure for its on-site abatement systems. 9. The site does not operate with confined spaces. 10. Should mains services be interrupted, the site will cease operations and arrange for remedial works to be carried out immediately. Diversion of waste will occur if necessary. 11. Active management and control of the site and its sealed drainage system ensures that there is no release of effluent to the local environment. 12. The site is fully fenced and never left unattended There is CCTV inside buildings and covering the areas of the sites situated in the yard. CCTV has sensors that link to a security company.

Ref	5 - General management appropriate measures	Implementation
		13. Operators are adequately trained and provided with regular refresher training in the form of toolbox talks. 14. The site's SCADA system can be accessed remotely in the event of an emergency occurring. Plant shutdown can also be undertaken remotely. 15. All waste processing takes place inside dedicated, sealed buildings. 16. A Climate Change Risk Assessment has been undertaken for the site and climate change is considered in the EMS. 17. Waste processing is limited to preparation of feedstock as a blended soup suitable for onward AD treatment. There are contingency procedures in place in the event that waste cannot be weighed at the Waste Organics' facility.
4	*You must assess the risk of accidents and their possible consequences. To help you do this you can either use:* • *the Environment Agency's risk assessment guidance*	A risk assessment exercise relating to potential accidents and their possible consequences has been undertaken. This is set out in section 3.0 of the site's Accident Management Plan. The risk assessment covers the following areas:

Ref	5 - General management appropriate measures	Implementation
	• *a HAZOP or a similar detailed assessment that identifies hazards through possible deviations from the design intention*	- Inadequate waste acceptance procedures; - Fires arising from storage of fuel and waste; - Fuel leak from fuel tank or vehicles; - Overfilling of on-site storage bays; - Breach of site containment systems; - Failure of site infrastructure/mains services; - Failure to contain firewater; - Site security failures/vandalism/arson; - Fugitive emissions (Noise, Pests, Odour, Mud, Debris); - Pest management; and, - Mud & debris.
5	*Risk is the combination of the likelihood that a hazard will occur and the severity of the impact resulting from that hazard. Having identified the hazards, you can assess the risks by addressing 6 questions:* • *how likely is it that the accident will happen?* • *what may be emitted and how much?* • *where will the emission go – what are the pathways and receptors?* • *what are the consequences?* • *what is the overall significance of the risk?*	A risk assessment exercise relating to potential accidents and their possible consequences has been undertaken. This is set out in section 3.0 of the site's Accident Management Plan. The risk assessment covers the following areas: - Inadequate waste acceptance procedures; - Fires arising from storage of fuel and waste; - Fuel leak from fuel tank or vehicles; - Overfilling of on-site storage bays; - Breach of site containment systems; - Failure of site infrastructure/mains services;

Ref	5 - General management appropriate measures	Implementation
	• *what can you do to prevent or reduce the risk?*	- Failure to contain firewater; - Site security failures/vandalism/arson; - Fugitive emissions (Noise, Pests, Odour, Mud, Debris); - Pest management; and, - Mud & debris.
6	*The depth and type of accident risk assessment you carry out will depend on the complexity of your facility and its location. The main factors to take into account are the:* *1. scale and nature of the accident hazard presented by the facility and its activities* *2. risks to areas of population and the environment (the receptors)*	A risk assessment exercise relating to potential accidents and their possible consequences has been undertaken. This is set out in section 3.0 of the site's Accident Management Plan. The risk assessment covers the following areas: - Inadequate waste acceptance procedures; - Fires arising from storage of fuel and waste; - Fuel leak from fuel tank or vehicles; - Overfilling of on-site storage bays; - Breach of site containment systems; - Failure of site infrastructure/mains services; - Failure to contain firewater; - Site security failures/vandalism/arson; - Fugitive emissions (Noise, Pests, Odour, Mud, Debris); - Pest management; and, - Mud & debris.

Ref	5 - General management appropriate measures	Implementation
7	*Through your accident management plan, you must also identify the roles and responsibilities of the staff involved in managing accidents. You must provide them with clear guidance on how to manage each accident scenario, for example as a result of a spillage of a potentially polluting liquid.*	Waste Organic's AMP clearly defines the roles and responsibilities of all relevant staff involved in responding to accidents, ensuring accountability and an effective chain of command during incident response. Each role is supported with clear, scenario-specific guidance on managing foreseeable incidents, such as the spillage of potentially polluting liquids, fire outbreaks, or unauthorised waste acceptance. Procedures include immediate containment measures, internal and external communication protocols, use of spill kits and personal protective equipment, and environmental protection steps. Staff receive regular training and drills to ensure familiarity and competence in carrying out these responsibilities.
8	*You must have a suitably trained facility employee available at all times who will act as an emergency co-ordinator and will take responsibility for implementing the accident management plan.*	Waste Organics ensure that a suitably trained facility employee is present on site at all times during operational hours to act as the designated emergency coordinator. This individual is fully trained in the site's AMP and takes lead responsibility for coordinating emergency responses, liaising with emergency services if required, and initiating containment and mitigation measures. Their training includes emergency procedures, communication protocols, and site-specific
9	*You must train your employees so they can perform their duties effectively and safely and know how to respond to an emergency.*	

Ref	5 - General management appropriate measures	Implementation
		risks, with regular updates to maintain readiness and compliance with permit conditions. Waste Organics fully acknowledge the importance of training in the waste management sector and are committed to ensuring that all employees are adequately trained to perform their duties safely, efficiently, and in full compliance with relevant legislation, including environmental and health and safety regulations. The training programme covers the handling of different waste types, use of equipment and PPE, site- specific procedures, and detailed emergency response protocols. Refresher training is provided regularly to ensure ongoing competence, and all training is documented to demonstrate regulatory compliance.
10	*You must also:* • *establish how you will communicate with relevant authorities, emergency services and neighbours (as appropriate) before, during and after an accident* • *implement emergency procedures, including for safe plant shutdown and site evacuation*	Waste Organics's AMP includes a robust set of procedures and protocols to ensure an effective response to any incident, with minimal risk to human health and the environment. The plan covers the following key areas: **Communication with authorities and stakeholders:**

Ref	5 - General management appropriate measures	Implementation
	• *implement post-accident procedures that include doing an assessment of the harm an accident caused (or may have caused) and actions you will take to prevent further accidents* • *consider the impact of accidents on the function and integrity of plant and equipment* • *have contingency plans to relocate or remove waste from the facility and suspend incoming waste* • *test the accident management plan by carrying out emergency drills and exercises.*	Waste Organics maintain up-to-date contact details for the Environment Agency, emergency services, local authorities, and neighbouring properties. Clear procedures are in place for timely communication before, during, and after an incident. This includes alerting authorities to any pollution risks or significant site impacts, keeping neighbours informed of developments where appropriate, and providing follow-up information on outcomes and remedial actions. **Emergency Procedures – Shutdown and evacuation:** The site has in place safe shutdown procedures for all plant and equipment to prevent escalation of incidents. Evacuation routes, muster points, and roles for emergency wardens are clearly defined. Staff are trained to initiate site evacuations and isolate key systems safely and efficiently. **Post-Accident Procedures – Harm assessment and remediation:** After any accident, a formal assessment is conducted to determine the nature and extent of harm caused to human health, the environment, or infrastructure. Waste Organics document all findings and implement appropriate remediation actions, including clean-up, containment, disposal of contaminated materials, and reporting to the Environment Agency where necessary.

Ref	5 - General management appropriate measures	Implementation
		Plant and equipment integrity: All incidents are reviewed for their potential impact on the function and structural integrity of plant and equipment. Any compromised assets are taken out of service and inspected before resuming operations, ensuring safety and preventing further risk. All fixed and mobile plant is subject to maintenance and servicing in line with manufacturer's recommendations. **Contingency plans for waste management:** Waste Organics have contingency plans in place to relocate or remove waste from the site in the event of a major disruption. These include identifying alternative authorised facilities and hauliers. Acceptance of incoming waste is suspended during significant incidents to prevent site overload and ensure safety. **Testing the AMP – Drills and exercises:** The AMP is tested regularly through emergency drills and simulated scenarios. These exercises involve staff across relevant roles and are reviewed to identify improvements. Outcomes are documented, and the plan is updated accordingly to ensure continual improvement and compliance with permit conditions.

Ref	5 - General management appropriate measures	Implementation
11	*Following a flooding event you must inspect and assess the integrity of affected plant and equipment, in particular infrastructure that may have been in contact with floodwater or groundwater. Tank inspections should include non-destructive testing methods to verify their integrity.*	Waste Organics can confirm that the integrity of affected plant, equipment and infrastructure would be inspected and assessed following a flooding event.
12	*Storage and drainage lagoons must have adequate storage capacity to make sure structural integrity is not compromised during extreme weather events.*	The site is not equipped with storage or drainage lagoons.
	5.5 - Preventing accidental emissions	
1	*You must have a drainage plan and in the event of an emergency this must be available to emergency services. The drainage plan should clearly identify clean and dirty or foul drainage.*	The site is equipped with a drainage plan. Please see document reference: Waste Organics NEW Layout. Clean drainage is marked in blue, and foul drainage is marked in red.
2	*You must make sure that in an emergency you can contain on site:* • *process waters*	The site has in place a comprehensive drainage plan to contain the following in an emergency: **Process waters:** All process water will be collected on site via the sealed drainage system serving the solid biodegradable organic waste reception hall for re-use on site. The collected water / leachate shall be

Ref	5 - General management appropriate measures	Implementation
	• *contaminated site drainage waters* • *emergency firefighting water* • *chemically contaminated waters* • *spillages of chemicals*	used to assist in the production of a pumpable material for mixing with liquid waste to produce a "soup". The tanks that make up the liquid waste reception and mixing tank farm are constructed of suitable material and the whole tank farm is bunded to ensure there would be no release of liquid off-site in the even of a spill or catastrophic tank failure. The water tank located outside the tank farm is constructed of glass reinforced plastic and is a self-contained bunded tank. The liquid waste reception hall also has a sealed drainage system to ensure any liquids spilled in this area, outside the tank farm, is collected for re-use in the process. **Contaminated site drainage waters:** All contaminated site drainage waters shall remain on site. The sealed drainage system within the solid and liquid waste reception hall prevents it from leaving site. The drainage system serving the external areas of the site ensures that collected surface water is discharged to sewer, clean, by means of a Class 1 interceptor with alarm. **Emergency firefighting water:** In the event of emergency firefighting water being generated, the sealed drainage system shall, prevent access to the sewer network as a result of firewater runoff.

Ref	5 - General management appropriate measures	Implementation
		Chemically contaminated waters: The site is equipped with a sealed drainage system which prevents any liquid from leaving the waste processing building, other than that leaving site as part of the produced "soup." The tank farm within the liquid waste reception / treatment building is bunded. The containment is designed to CIRIA C736 guidance, offering containment of 110% of the largest tank by volume. **Spillage of chemicals:** Any spillage that occurs on site are dealt with using the site's spillage procedure. Spill kits are available at the point of use and will be used to contain any spillages in the first instance. Furthermore, the site is equipped with a sealed drainage system which prevents any spillages from leaving the waste processing building.
3	*You must put spill contingency procedures in place to minimise the risk of an accidental emission of raw materials, products, and waste materials, and to prevent their entry into water, land and air.*	The site has in place a spill response procedure. Measures undertaken for dealing with spills are set out in section 3.0 of the site's Accident Management Plan.
4	*Your drainage and collection system must take account of additional firefighting water flows or firefighting foams. You may need emergency storage to prevent contaminated firefighting water reaching a receiving water body.*	The site's sealed drainage system shall prevent firefighting water or foams from leaving site.

Ref	5 - General management appropriate measures	Implementation
5	You must consider and reduce the risk of accidental emissions from: • *loss of containment – all polluting matter* • *vents* • *safety relief valves – making sure these are checked and maintained (preventing sticking and over feeding, see site capacity in section 4)* • *bursting discs and seals* • *tank wall penetrations* • *storage containers*	The site has in place a number of control measures to minimise the risk of accidental emissions: **Loss of containment:** The two buildings on site are served by an impermeable surface with sealed drainage system. Any liquid that is deposited or spilled in these areas are collected within the drainage system and used in the "soup" making process. Externally, surface water is collected by a separate surface water drainage system which directs surface water to an interceptor before being discharged into the foul sewer. The tank farm located within one of the buildings on site is fully bunded in line with the CIRIA C736 guidance. The separate water tank located next to the tank farm is a self-contained bunded tank constructed of GRP. **Vents, safety relief valves and (bursting) discs and seals:** Infrastructure on site shall be inspected in accordance with the manufacturer's recommendations. Tank integrity checks are undertaken in accordance with the frequency laid out in the site's Environmental Permit. **Tank wall penetrations:** The site's tank farm is equipped with a bund wall, which mitigates the risk of collision of mobile plant with tank walls. The separate water tank located next to the tank farm is a self-contained

Ref	5 - General management appropriate measures	Implementation
		bunded tank constructed of GRP. The integrity of tank walls is assessed as part of the site's Environmental Permit conditions. **Storage containers:** All biodegradable and liquid wastes received on site are stored within the waste reception / treatment buildings and are appropriately segregated, as detailed below: The northern portion of the building which runs in a north to south orientation is the solid biodegradable waste reception and processing building. The floor of this portion of the building is constructed of impermeable concrete and features a sealed drainage system. The portion of the building which runs in an east to west orientation is the liquid waste reception hall. This area contains a bunded tank farm which stores liquid wastes that are delivered to site via vehicle tanker.
6	*Liquids or fire water held in the buffer storage must be removed from site.*	All liquids or fire water held temporarily will be contained and removed from site as appropriate.
	5.6 - Security measures	

Ref	5 - General management appropriate measures	Implementation
1	*You must have security measures (including staff) to prevent unauthorised access to your facility, so preventing:* • *damage to equipment* • *entry by vandals and intruders* • *theft* • *illicit dumping and fly-tipping* • *arson*	The site has a number of security measures in place to guard against the following: **Damage to equipment:** The site is fully fenced with a 2-metre-high chain link fence. The site is open 24 hours a day and therefore the site is never left unattended. The site has CCTV, which will include a yearly service contract. 2m high chain link and palisade fencing surrounds the site which will be inspected daily by trained staff. **Entry by vandals and intruders, theft, and illicit dumping and fly-tipping:** All visitors are required to sign in upon arrival at site. The site is fully fenced with a 2-metre-high chain link fence, and is equipped with CCTV, which should provide a deterrent to vandals and intruders. The site is never left unattended. The site has comprehensive lighting within the sites building and covering all of the external processing area. **Arson:** The site is equipped with CCTV, any combustible wastes that are stored on site are stored within the waste reception building. The site is never left unattended.
2	*Facilities must use one or a combination of the following measures:* • *security guards* • *total enclosure (usually with fences)* • *controlled entry points* • *Adequate lighting* • *warning signs* • *24-hour surveillance, such as CCTV*	

Ref	5 - General management appropriate measures	Implementation
	5.7 - Fire prevention	
	1. You must have a fire prevention plan that meets the requirements of the Environment Agency's fire prevention plan guidance. The plan should include: • *preventing the uncontrolled decomposition and self-heating of stored waste by managing and monitoring temperature and moisture* • *implementing written systems to prevent unsafe situations during site operations, repair and maintenance* • *having a 'permit to work' system in place for maintenance and repairs, such as hot work on plant and equipment, and where the risk of unsafe conditions could occur* • *having appropriate systems in place for fire and explosion prevention, detection and suppression or extinction – you must document these measures in your accident management plan or fire prevention plan, if required, to*	1. The site has in place a Fire Prevention Plan which sets out the control measures in place to minimise the risk of fire occurring on site. 2. Waste will be processed in a timely manner which will help to prevent build-up of wastes. Vehicles and machinery will be swept if deemed to be excessively dusty. The on-site concrete pad will also be washed if deemed to be dusty or dirty as appropriate. 3. The site has a robust management and maintenance procedure in place for plant and equipment, which is serviced and maintained in line with manufacturer's recommendations. The tank farm has a bund, which acts as a barrier to prevent moving vehicles damaging the on-site tanks.

Ref	5 - General management appropriate measures	Implementation
	comply with your permit conditions. 2. *You must prevent the build-up of loose combustible material (including dust and waste) particularly around treatment plant, equipment and other potential sources of ignition.* 3. *You must:* • *make sure that all the measurement and control devices you would need in an emergency are easy to access and operate in an emergency situation* • *maintain plant in a good state through a preventive maintenance programme and a control and testing programme* • *use techniques such as suitable barriers to prevent moving vehicles damaging equipment* • *put procedures in place to avoid incidents due to poor communication between operating staff – during shift changes, periods of cover by temporary staff and following maintenance or other engineering work*	Roles and responsibilities across the site are comprehensively set out in section 3.0 of the site's EMS document. 4. All alarms are appropriately set and responded to as part of the security measures in place on site. The site is open 24 hours a day, ensuring there is always an on-site presence. 5. Critical safety equipment is maintained in accordance with manufacturer recommendations and the site's maintenance schedule. 6. All workers are monitored and protected on site, as appropriate, in accordance with the HSE guidelines. 7. Waste Organics can confirm that all assessments are/will be carried out in accordance with relevant health and safety guidelines.

Ref	5 - General management appropriate measures	Implementation
	• *where relevant, use equipment and protective systems designed for use in potentially explosive atmospheres.* 4. *You must be mindful of alarm fatigue and make sure all alarms are appropriately set and promptly responded to.* 5. *You must make sure that critical safety equipment, for example sprinklers, pressure relief valves and flares are maintained and kept in good working order.* 6. *Workers on site must be protected and monitored in line with the Health and Safety Executive (HSE) guidelines and regulations.* 7. *You must carry out all assessments in line with your facility's occupational exposure process and health and safety guidelines*	
	5.8 – Firefighting	
1	*Your accident plan must clearly state what actions are taken to extinguish fires on site and operators must be trained in these procedures.*	The site is equipped with fire extinguishers, which all staff are trained to use. A fire procedure is enforced across the site and implemented by all staff.

Ref	5 - General management appropriate measures	Implementation
2	*Your facility must have access to water supplies to extinguish fires. In remote locations where water supplies are not available you must seek advice from your local fire service.*	The site has access to water supplies in the event of a fire.
3	*In the event of a fire on site, your accident plan must consider how you will prevent firefighting run-off leaving site. Where possible you should have the capability to collect, contain and store firefighting water run-off.*	The site is equipped with a sealed drainage system, which ensures that any firefighting water can be collected and contained on-site prior to disposal.
4	*You must isolate drainage systems from flammable waste storage areas to prevent fire spreading along the drainage system by solvents or other flammable hydrocarbons.*	The site's sealed drainage system can be isolated from waste storage areas. The waste to be accepted onto site is not flammable in nature.
	5.9 - Record keeping and procedures	
1.	*You must:* • *keep an up-to-date record of all accidents, incidents, near misses, changes to procedures, abnormal events, and the findings of maintenance inspections* • *carry out investigations into accidents, incidents, near*	Waste Organics are fully committed to complying with the Environment Agency's notification requirements and will notify the Agency without delay upon detection of any event that is causing, or may cause, significant pollution. This includes:

Ref	5 - General management appropriate measures	Implementation
	misses and abnormal events and record the steps taken to prevent their reoccurrence • *maintain an inventory of substances which are present (or likely to be) and which could have environmental consequences if they escape* • *record and hold a critical plant and equipment asset register, including a register of equipment installed in explosive atmospheres (ATEX-rated equipment).*	• Any malfunction, breakdown, or failure of plant, equipment, or systems that could impact environmental controls or site safety. • Accidents that result in or have the potential to result in pollution, harm to human health, or breach of permit conditions. • Emission of a substance not controlled by an emissions limit, where there is a risk of environmental impact. • Any breach of an emissions limit set out in the site's environmental permit.
	You must notify the Environment Agency without delay if you detect any of the following events and they are causing, or may cause, • *significant pollution:* • *a malfunction* • *a breakdown or failure* • *an accident* • *emission of a substance not controlled by an emissions limit*	All such incidents will be reported immediately using the Agency's designated contact methods, with initial details followed by a full written report once investigations are complete. Internal procedures are in place to ensure that incident detection, escalation, and notification are carried out promptly and effectively by trained personnel.

Ref	5 - General management appropriate measures	Implementation
	• *breach of an emissions limit*	
	5.10- Contingency plan and procedures	
1	*You must implement a contingency plan so that you:* • *comply with all of your permit conditions and operating procedures during maintenance or shutdown at your facility, including disruption at other facilities that would affect supplies to your facility or the removal of waste from it* • *do not exceed limits in your permit and continue to apply appropriate measures for waste storage, handling and treatment.* • *stop accepting waste unless you have a clearly defined method of recovery or disposal, and enough permitted storage capacity when land bank availability is limited, for example, during exceptional weather events such as prolonged rain or snowfall, deep frosts and severe drought* • *plan for any restrictions that will affect the spreading of digestate or compost to land, for example, nitrate*	The site has a set of contingency measures in place. Where storage/processing limits are reaching capacity, the site shall cease accepting waste until such a time that the facility is up and running again. Waste Organics maintain partnerships with a network of feedstock suppliers and anaerobic digestion facility operators, ensuring that an effective supply chain is maintained at all times. The site maintains a register of all the permitted facilities that could accept and manage the waste in the event that the Waste Organics site is unavailable to process feedstock. The effectiveness of the site's contingency arrangements shall be audited not less than annually, in line with the auditing schedule for the overarching EMS.

Ref	5 - General management appropriate measures	Implementation
	vulnerable zones (NVZ) closed periods	
2	*You must have the following in your contingency plan:* • *a description of each waste and material and the correct LoW code for each waste (inputs and outputs)* • *details of permitted waste facilities that could accept and manage your waste if site holding capacity will be exceeded – you must obtain a copy of the site permit to make sure it can accept your waste type* • *the capacity (volume) of all contingency options and the length of time for which it would be available or needed* • *potential environmental and health and safety risks and hazards of all contingency options (for example, odour and emission generation, or leachate production from longer-term storage)* • *any legal restrictions or constraints for each contingency option*	
3	• *You must identify your contingency options for use over*	

Ref	5 - General management appropriate measures	Implementation
	the short term (1 to 2 weeks), medium term (4 to 6 weeks) and the long term (up to 6 months).	
4	*Your management procedures and contingency plan must also:* • *identify known or predictable malfunctions associated with your technology and the procedures, spare parts, tools and expertise needed to deal with them* • *make sure you have the spare parts, tools, and competent staff needed before you start maintenance* • *record where you can get critical spare parts from and how long it would take to obtain them if you cannot hold them on site* • *have a defined procedure to identify, review and prioritise items of plant which need a preventative regime* • *include all equipment or plant whose failure could directly or indirectly lead to an impact on the environment or human health*	

Ref	5 - General management appropriate measures	Implementation
	• *identify non productive or redundant items such as tanks, pipework, retaining walls, bunds, reusable waste containers, ducts, filters and security systems.*	
5	*You must make your feedstock suppliers and customers aware of your contingency plan, and of the circumstances in which you would stop accepting waste from them.*	
6	*You must consider whether the sites or companies you rely on in your contingency plan:* • *can take the waste at short notice* • *are authorised to do so in the quantities and types likely to be needed in addition to carrying out their existing activities – if in doubt contact your local Environment Agency office for advice.*	
7	*You must not include unauthorised capacity in your contingency plan. If your contingency plan includes using temporary storage*	

Ref	5 - General management appropriate measures	Implementation
	for additional waste on your site, then you must make sure your site is authorised for this storage and the appropriate infrastructure is in place.	
8	*Your management system must include procedures for auditing your performance against all the contingency measures detailed above and for reporting the audit results to the site manager.*	
9	*If you produce an end of waste material at your facility, your contingency planning must consider storage capacity for end of waste products and materials that fail the end of waste specification.*	
	5.12 – Decommissioning and Mothballing	
1	*You must consider the decommissioning of the facility at the design stage and make suitable plans to minimise risks during decommissioning.*	The site has been designed in a manner that takes serves to streamline the decommissioning process.

Ref	5 - General management appropriate measures	Implementation
2	*You must have plans that minimise risks during the time decommissioning or mothballing takes place. This includes removing or replacing individual items of plant throughout the life of the facility.*	Waste Organics can confirm that a risk assessment exercise will be undertaken prior to decommissioning commencing to ensure that risks are reduced as much as possible, with residual risk appropriately managed.
3	*Before you decommission plant you must notify the Environment Agency and provide a copy of your decommissioning plan.*	The Environment Agency will be notified and provided with a copy of the site's decommissioning plan prior to decommissioning.
4	*Once decommissioning is complete you must provide a written report to the Environment Agency verifying that you have carried out activities in line with your plan.*	Waste Organics shall produced a report demonstrating that decommissioning activities have been carried out in accordance with the plan.
5	*If you bring plant back into service after a period of dormancy you must follow the commissioning requirements set out in this document or be directed by a suitably qualified person.*	Waste Organics confirms that it shall follow the commissioning requirements set out in the appropriate measures guidance, and/or be directed by a suitably qualified person.
6	*You must have a decommissioning plan to demonstrate that:* • *plant can be decommissioned without causing pollution*	Prior to decommissioning, Waste Organics shall produce a decommissioning plan for the site which shall confirm that a) the plant can be decommissioned without causing pollution, and b) that the site

Ref	5 - General management appropriate measures	Implementation
	• *the site will be returned to a satisfactory condition, for example in line with your site condition report.*	will be returned to a satisfactory condition, for example in line with the site condition report.
7	*The decommissioning plan must include details of (but not limited to):* • *removing or flushing out pipelines and vessels where appropriate and completely emptying any potentially harmful contents* • *drawings showing all the underground pipes and vessels* • *the method and resources needed for clearing lagoons* • *how you will dismantle buildings and other structures in a way that protects surface water and groundwater at construction and demolition sites* • *the soil testing needed to understand the degree of any pollution caused by the site activities, and information on*	Waste Organics can confirm that the decommissioning plan shall include details of the following: • The method by which pipelines and vessels will be flushed or removed as appropriate; • Schematic drawings of underground pipes and vessels; • How buildings and other structures shall be dismantled in a manner that prevents environmental harm • Soil/geochemical testing required and/or undertaken by the time of decommissioning to understand the degree of any pollution, and information on remediation measures to return the site to a condition judged satisfactory;

Ref	5 - General management appropriate measures	Implementation
	what remediation is needed to return the site to a satisfactory state as defined by the initial site report • *the measures proposed, once activities have ceased, to avoid any pollution risk and to return the site to a satisfactory state (including, where appropriate, those covering the design and construction of the plant)* • *how you will clear any residues, waste, and any contamination resulting from the waste treatment activities*	• Measures in place to avoid any pollution risk and return the site to a satisfactory state; and, • How any residues, waste and contamination shall be cleared from the site.

2.2 Waste pre-acceptance, acceptance & tracking

These are appropriate measures for waste pre-acceptance, acceptance and tracking at a regulated facility permitted to store, treat or transfer wastes suitable for biological treatment.

Ref	6 - Waste pre-acceptance, acceptance & tracking	Implementation
	6.1 - Waste pre-acceptance and characterisation	
1	*You must use WM3 technical guidance on waste classification to be able to assign the correct waste classification code.*	Only wastes classified under the EWC codes listed in the site's Environmental Permit as approved by the EA are accepted onto site for processing.
2	*When you receive a customer enquiry and before the waste arrives at the facility, you must obtain the following in writing or in an electronic form:* • *details of the waste producer including their organisation name, address and contact details* • *the source and nature of the waste, at the point of production (the process that gives rise to the waste)* • *a description of the waste including its physical form*	In line with the site's Waste Acceptance Procedure (EPR-OP02), the following details shall be obtained from the waste supplier before the waste arrives at site for processing: • details of the waste producer including organisation name, address and contact details • source and nature of the waste • a description of the waste including its physical form • check on constituents declared by waste producer/holder to ensure Permit compliance, treatment plant specification and final disposal

Ref	6 - Waste pre-acceptance, acceptance & tracking	Implementation
	• *the full characteristics of the waste including the variability of each waste (for example, liquid effluents must be individually assessed and tested, understanding of the waste's composition and characterisation must be based on representative samples)* • *a description of any hazardous properties including potential risks to process safety, occupational safety and the environment* • *the odour potential* • *the type of packaging and risks of contamination* • *an estimate of the quantity you expect to receive in each load and in a year* • *the potential for self-heating, self-reactivity or reactivity to moisture or air* • *the age of the waste*	• any hazardous characteristics • type of packaging and risks of contamination • the age and odour potential of the waste • colour • pH • presence, strength and description of odour assessment (note COSHH implications).

Ref	6 - Waste pre-acceptance, acceptance & tracking	Implementation
3	*During pre-acceptance you must consider how you will manage and control the nutrient balance of the waste feedstock, the moisture and any toxic compounds which may inhibit biological activity.*	Information pertaining to the nature of the waste and its source will determine whether any management and control of nutrient balance is required.
4	*You must verify the pre-acceptance information by contacting or visiting the producer. Dealing with staff directly involved in waste production can help to fully characterise a waste.*	Waste Organics can confirm that pre-acceptance information will be verified prior to any processing of that waste taking place at the site. This shall take the form of either a telephone conversation with the waste producer, and/or a site visit.
5	*You must keep pre-acceptance records for at least 3 years (in a computerised waste tracking system) following receipt of the waste. If an enquiry does not lead to receipt of the waste, you do not need to keep records.*	Pre-acceptance records are to be retained, electronically, by Waste Organics for at least 3 years. The information regarding pre-acceptance shall be reviewed annually or sooner should there be a change to the waste, a change to the process giving rise to the waste or the waste received on site does not confirm to the pre-acceptance description.

Ref	6 - Waste pre-acceptance, acceptance & tracking	Implementation
6	*You must reassess the information you had at pre-acceptance yearly. You must also reassess information required at pre-acceptance if the:* • *waste changes* • *process giving rise to the waste changes* • *waste received does not to conform to the pre-acceptance information.* *Before you accept waste you must consider its potential odour and emissions impact (description and intensity), for example:* • *mercaptans, ammonia or other volatile organic compounds (VOCs)* • *low molecular weight amines, for example, decaying fish or meat* • *other high-nitrogen and odorous materials or chemicals, for example from highly decomposed food waste or poultry manure* *You can only accept odorous wastes using special handling*	Waste Organics confirm that a re-assessment exercise will be undertaken if any or all of the following occur: • *The nature of the waste changes;* • *The process giving rise to the waste changes* • *The received wastes do not conform to the pre-acceptance information.* The odour potential and emissions impact of wastes shall be considered prior to acceptance onto site. Any wastes that are deemed to be excessively odorous or generate emissions disproportionate to the nature of the operations shall be rejected from site.

Ref	6 - Waste pre-acceptance, acceptance & tracking	Implementation
	and storage arrangements such as in adequately covered or air contained and abated areas.	
7	*You must keep separate the roles and responsibilities of sales staff and technical staff. If sales staff are involved in waste enquiries then technical staff must carry out a final assessment before approval.*	Roles and responsibilities of on-site staff pertaining to waste acceptance are set out in section 4.0 of EPR OP02 – Waste Acceptance Procedure. The roles and responsibilities are summarised below: **Site Manager Responsibilities** The Site Manager will be responsible for: • Ensuring all staff are inducted and trained in relevant site procedures. • Ensuring all company H&S protocols are adhered too, keep site compliant with Environment Agency permit. • Developing and implementing environmental strategies and action plans, to ensure corporate sustainable development. • Taking the lead on sustainable procurement for all goods and services. • Coordinating all aspects of pollution control, waste management, recycling, environmental health, conservation and renewable energy.

Ref	6 - Waste pre-acceptance, acceptance & tracking	Implementation
		• Ensuring details and photographs of any nonconforming product are sent as appropriate. **<u>Technically Competent Manager Responsibilities</u>** The technically competent manager is responsible for: • Ensuring all goods received are inspected on arrival. • Material receipt, inspection and processing. • Ensuring that any non-conforming material is dealt with. • Ensuring any discrepancies from the type of material advised are reported back to the Weighbridge Operator. • Ensuring photographs are taken of nonconforming product as appropriate. **<u>The Weighbridge Operator Responsibilities</u>** The weighbridge operator is responsible for: • Ensuring the vehicle driver provides all of the relevant information. • Ensuring that only the vehicle is located on the weighbridge and that the driver has positioned the vehicle correctly.

Ref	6 - Waste pre-acceptance, acceptance & tracking	Implementation
		• Ensuring that they communicate with the Site Staff about tipping and loading locations for the vehicle in accordance with the Site Plan. • Ensuring the vehicle driver has the correct personal protective equipment (PPE) when entering the yard, issuing where necessary and retrieving when leaving the site. • Adjusting the weight to account for any deductions or weight anomalies. • Processing all paperwork related to the delivery as necessary, including the Waste Transfer Note (Duty of Care documentation). • Maintaining the site diary. • Ensuring all goods received are inspected on arrival. **<u>The Site Staff Responsibilities</u>** The site staff are responsible for: • Maintaining strong H&S culture. • Ensuring that the vehicle driver tips and loads in the correct location in accordance with the Site Plan. • Ensuring the vehicle driver has located the vehicle correctly on the weighbridge and that no one is standing on the weighbridge. • Identifying any non-conforming material.

Ref	6 - Waste pre-acceptance, acceptance & tracking	Implementation
		• Inspecting the load and advising the Weighbridge Operator of any deductions that must be made along with any non-conforming product received. • Dealing with nonconforming product in accordance with the site procedures. **Vehicle Driver Responsibilities** The vehicle drivers are responsible for: • Ensuring that vehicles are located correctly on the weighbridge. • Following directions from Site Staff/Weighbridge Operators. • Handing in/collecting any documentation as appropriate.
8	*You must use this final technical check to make sure that you:* • *only accept wastes that are suitable and permitted for the site* • *avoid over accumulating waste* • *have enough storage and treatment capacity*	Only wastes stipulated in the Environmental Permit and Section 5.0 of the site's Waste Acceptance Procedure shall be accepted onto site. The maximum amount of time the solid waste is stored prior to treatment is 48 hours, which prevents the over accumulation of waste at any time. The shall at all times, maintain enough storage and

<table>
<tr><th>Ref</th><th>6 - Waste pre-acceptance, acceptance & tracking</th><th>Implementation</th></tr>
<tr><td></td><td></td><td>treatment capacity for all received wastes. The site is equipped with the following infrastructure for the storage of wastes before, during and after processing:
6No. liquid storage tanks, each with a capacity of 55m^3.
1No. water storage tank with a capacity of 60m^3.
1No. mixing tank with a capacity of 494m^3.
1No. batch tank with a capacity of 218m^3.</td></tr>
<tr><td>9</td><td>You must also record the criteria for non-conformance or rejection</td><td>The criteria for non-conformance or waste rejection are set out in sections 2.3 and 2.4 of OP02 – Waste Acceptance Procedure. Waste rejection triggers are as follows:<table><tr><th>Waste Rejection Triggers</th></tr><tr><td>a) No Waste Transfer Note.</td></tr><tr><td>b) Material contamination.</td></tr><tr><td>c) No current site capacity to process material.</td></tr></table></td></tr>
</table>

Ref	6 - Waste pre-acceptance, acceptance & tracking	Implementation
		d) EWC codes do not match waste description or feature on the allowable input list. Should contaminants be identified following deposition of the waste, the Site Manager shall determine the appropriate course of action. Where possible, the contamination shall be removed and stored in a separate container. Should the contamination levels be too high (i.e. greater than 5%), the load shall be rejected. The load shall be re-loaded onto the vehicle that deposited it or the load shall be transferred to the quarantine are to await re-collection.
10	*You must make sure that your facility can comply with other regulatory requirements, for example the Animal By-Products Regulations.*	The site shall be approved by the Animal Plant Health Agency.
11	*You must advise your customers that they must avoid contaminating waste because it can cause handling difficulties*	Waste Organics can confirm that all customers are advised of the requirement to avoid contaminating wastes, due to the subsequent handling difficulties that may occur.

Ref	6 - Waste pre-acceptance, acceptance & tracking	Implementation
	and inhibit the biological treatment process. You must tell them what wastes are likely to contaminate your process.	
12	*You must not transfer waste unnecessarily between waste facilities.*	The only waste that shall undergo transfer to another site is the blended biowaste "soup", which shall be transferred to anaerobic digestion sites for further treatment.
13	*You must obtain a representative sample or analysis, or analyse a representative sample of a waste, if:* • *the chemical composition or variability of the waste is unclear from the information supplied by the customer* • *there are doubts about whether the sample analysed is representative of the waste* • *you will treat the waste at your facility (this will allow you to carry out tests to determine if the planned treatment will be safe and effective)*	Waste Organics shall obtain a representative sample and analysis of a waste if any of the following apply: • the chemical composition or variability of the waste is unclear from the information supplied by the customer • there are doubts about whether the sample analysed is representative of the waste • the waste is to be treated on site A representative sample and analysis is not required if any of the following apply:

Ref	6 - Waste pre-acceptance, acceptance & tracking	Implementation
		• a lot of the solid biodegradable organic waste is packaged food waste from food manufacturers or food retailers – however, confirmation of its origin is required and there must be sufficient information to understand if it will affect the treatment process • the waste is biodegradable agricultural waste direct from the agricultural premises - however, confirmation of its origin is required and there must be sufficient information to understand if it will affect the treatment process.
14	*You must make sure that feedstock testing and testing frequency reflects the nature of the material, how it arises and any potential variation within it. For example, taking account of seasonal variations.* *After fully characterising a waste, you must technically assess the waste's suitability for treatment and storage to make sure you can meet your permit conditions and any other regulatory*	Only wastes stipulated in the Environmental Permit and Section 5.0 of the site's Waste Acceptance Procedure shall be accepted onto site. All wastes accepted onto site shall be treated and stored in accordance with the conditions set out in the permit and other regulatory requirements.

Ref	6 - Waste pre-acceptance, acceptance & tracking	Implementation
	requirements. You must make sure that the waste complies with the site's treatment capabilities and capacities.	
16	*When you agree that you will accept waste from a customer, you should decide and record what parameters you will check at the acceptance stage. The checks could be visual, physical, chemical and odour-based parameters. You must also record the criteria for non-conformance or rejection. The person checking the waste for acceptance can also decide on their own additional parameters.*	The parameters for assessing waste prior to acceptance onto site are set out in section 2.2 of OP02 – Waste Acceptance Procedure. The acceptance checks include consideration of supporting paperwork – Waste Carriers Certificate of Registration and the Waste Transfer Note, and Duty of Care Waste Transfer Note. The waste shall also undergo a visual and olfactory inspection prior to tipping.
	6.3 - Waste acceptance and rejection	
1	*You must implement waste acceptance procedures to check the characteristics of the waste received matches the information you obtained during waste pre-acceptance. This is to confirm the waste is as expected and you can accept it, or that you must reject it.*	Waste Acceptance Procedure (EPR-OP01): Upon arrival on site, waste loads will: • be weighed or use the WTN to find tonnages, unless alternative reliable volumetric systems linked to specific gravity data are available; • not be accepted into site unless sufficient storage capacity exists and site is adequately manned to receive waste;

Ref	6 - Waste pre-acceptance, acceptance & tracking	Implementation
	Your procedures must follow a risk-based approach, considering: • *the source and nature of the waste* • *the variability of a waste (for example, liquid effluents) – you must carry out individual assessment and testing* • *any hazardous properties the waste may have* • *potential risks, process safety, occupational safety and the environment (for example from odour and other emissions)* • *knowledge about the previous waste holder(s) and the age of the waste* • *the waste's potential for self-heating, self-reactivity or reactivity to moisture or air.*	• have all documents checked and approved, and any discrepancies resolved before the waste is accepted; and, • have any labelling that does not relate to the contents removed before acceptance on site. Where possible, visual confirmatory checks will be undertaken before offloading where safety is not compromised. An inspection must in any event be carried out immediately upon offloading at the site. After the load has been accepted at the weighbridge, the site staff shall notify the driver to proceed to the appropriate waste reception area depositing; solid waste reception hall for solid waste and liquid waste reception hall for liquid wastes. After unloading, the wheels of the vehicle are washed, before the vehicle leaves the building and is re-weighed prior to leaving the site. For any waste arriving on site, a record is kept of: • Date and time of waste delivered; • Type of waste; • Approximate weight of load; • Duty of care transfer note; • Vehicle registration number;

Ref	6 - Waste pre-acceptance, acceptance & tracking	Implementation
		• Haulier and waste carrier registration number; • SIC code, and; • European Waste Code (EWC). No waste will be accepted at the site which does not comply with the conditions of the Environmental Permit. Any non-conforming material will be quarantined and disposed of in accordance with the regulations.
2	*You must identify the effects of any seasonal variance on the waste's composition.*	Feedstock to be accepted at the site consists of biodegradable organic waste, both in palletised and loose form. Consequently, seasonal variance is expected to be limited.
3	*You must only receive bespoke waste onto site that you have pre booked and that matches the pre-acceptance information.* *If you need to take samples on site, they must be representative of the waste and taken by a technically competent person. This*	As part of the waste acceptance procedure, Waste Organics operatives carry out pre-acceptance checks on the waste to ensure that the delivered load conforms to the nature, composition and EWC code it is categorised against.

Ref	6 - Waste pre-acceptance, acceptance & tracking	Implementation
	means they must be appropriately trained or hold the relevant qualifications.	In the event that sampling is required, this will be undertaken by a technically competent person, and be representative of the waste load received onto site.
4	*You must visually check wastes and verify them against pre-acceptance information and transfer documentation before you accept them on site. The extent of the initial visual check is determined by the waste type and how it is packaged.*	Where possible, visual confirmatory checks of solid wastes are undertaken before offloading where safety is not compromised. Liquid wastes received onto site are pumped directly into the onsite tank farm, and cannot be subject to a visual inspection. Nevertheless, all details pertaining to the waste and relevant transfer documentation is inspected and approved prior to accepting waste loads onto site.
5	*You must check and validate all transfer documentation and resolve discrepancies before you accept the waste. If you believe the incoming waste classification and description is incorrect or incomplete, you must address this with the original waste producer during waste acceptance.*	Please see response to question 1 above, for a detailed assessment of how waste is accepted onto site.

Ref	6 - Waste pre-acceptance, acceptance & tracking	Implementation
6	*You must record any non-conformances.* *If you have assessed the waste as acceptable for storage or treatment at your facility, you must document this.*	Non-conformances are recorded in line with the procedures set out within section 2.3. of OP02 – Waste Acceptance procedure: • Any incoming loads that do not meet Waste Organics' waste acceptance standards will be either not unloaded or reloaded and removed from site. For loads which are rejected prior to deposit, the driver will be instructed to park the vehicle as an interim measure for closer inspection. The competent manager will be contacted prior to the rejected materials being removed from the compost site and, if appropriate, the ticket and billing rate amended; • For loads which are rejected following deposit, the unsuitable materials or the whole load depending upon the degree of contamination, will be isolated and sored on an impermeable concrete holding or quarantine area is present on site. Subsequent actions will be dependent upon the reason for rejection and would be similar to those outlined above • Rejection procedure information will be sent to all suppliers and signed by them before intake of any loads begin on-site.

Ref	6 - Waste pre-acceptance, acceptance & tracking	Implementation
7	*You must have clear criteria that you use to identify non-conforming wastes and wastes to be rejected.*	The criteria for identifying non-conforming wastes and rejected wastes are set out in the response to reference 8 of section 6.1 – waste pre-acceptance and characterisation.
8	*You must have clear criteria that you use to identify non-conforming wastes and wastes to be rejected. You must also have written procedures for recording, reporting and tracking non-conforming and rejected wastes. These must include:* • *using quarantine storage* • *notifying the relevant customer or waste producer* • *recording a summary of your justification for accepting non-conforming waste in your electronic (or equivalent) system*	The waste rejection procedure is outline in the Waste Acceptance Procedure, as below: All Waste Organics staff will be trained in rejection procedures starting with induction, regular toolbox talks and site supplier updates. In the unlikely event that it is found necessary to refuse to accept a particular load for disposal, a standard rejection procedure will be implemented. The waste rejection procedure to be complied with will be: • Any incoming loads that do not meet Waste Organics' waste acceptance standards will be either not unloaded or reloaded and removed from site. For loads which are rejected prior to deposit, the driver will be instructed to park the vehicle as an

Ref	6 - Waste pre-acceptance, acceptance & tracking	Implementation
		interim measure for closer inspection. The competent manager will be contacted prior to the rejected materials being removed from the compost site and, if appropriate, the ticket and billing rate amended; • For loads which are rejected following deposit, the unsuitable materials or the whole load depending upon the degree of contamination, will be isolated and sored on an impermeable concrete holding or quarantine area is present on site. Subsequent actions will be dependent upon the reason for rejection and would be similar to those outlined above; • In the event that the waste material should be determined to be Hazardous Waste then the relevant consignment notification form will be prepared, in conjunction with the haulier or producer and the material will be transported to an appropriate treatment or disposal site; • Rejection procedure information will be sent to all suppliers and signed by them before intake of any loads begin on-site; and, • The Environment Agency will also be notified. The following waste rejection triggers apply to Waste Organics:

Table 1 - Waste Rejection Triggers

Waste Rejection Triggers
a) No Waste Transfer Note.
b) Material contamination.
c) No current site capacity to process material.
d) EWC codes do not match waste description or feature on the allowable input list.

<u>Waste Contamination</u>

Should contaminants be identified following deposition of the waste, the Site Manager shall determine the appropriate course of action. Where possible, the contamination shall be removed and stored in a separate container. Should the contamination levels be too high (i.e. greater than 5%), the load shall be rejected. The load shall be re-loaded onto the vehicle that deposited it or the load shall be transferred to the quarantine are to await re-collection

Clearly defined criteria and documented procedures are maintained for the identification, management, and prevention of non-conforming and

Ref	6 - Waste pre-acceptance, acceptance & tracking	Implementation
		rejected wastes. These ensure compliance with permit conditions and protect site safety and the environment.
9	*You must take measures to prevent the recurrence of non-conforming and rejected wastes.*	•Rejection procedure information will be sent to all suppliers and signed by them before intake of any loads begin on-site. This shall help to minimise the re-occurrence of non-conforming and rejected wastes.
10.	*You must weigh and record each load of waste on arrival to confirm the quantities against the accompanying paperwork, unless there are other reliable systems (for example, based upon density and volume). You must record the weight in a system that enables tracking.* *The person carrying out waste acceptance checks must be trained to effectively identify and manage any non-conformances in the loads received.*	All incoming vehicles will enter via the existing waste facility site entrance and will drive to the weighbridge. Documentation will be checked by the operative, to ensure that the waste complies with the waste types permitted by the Planning Permission, Permit Regulations or any subsequent updates. The list of acceptable waste codes can be found in the environmental permit and Section 5.0 of EPR-OP02 – Waste Acceptance Procedure.

Ref	6 - Waste pre-acceptance, acceptance & tracking	Implementation
	After the initial visual inspection and confirmatory checks, you must offload the waste into a dedicated reception or storage area to wait for detailed checks or sampling. Wastes that do not require further checking can go into the appropriate storage area.	All personnel responsible for carrying out waste acceptance checks are trained and competent to identify and manage non-conformances effectively. This training ensures compliance with: • The environmental permit conditions • The statutory Duty of Care under Section 34 of the Environmental Protection Act 1990 • Relevant waste classification, handling, and health & safety regulations
11	*You must not offload wastes if you do not have enough space and capacity to treat the waste at that time.*	All wastes are processed within 24 hours of arriving at site. Waste shall not be offloaded if the site does not have sufficient capacity to store or treat the waste.
13	*You must verify the waste is compliant as soon as possible.*	Verification of the waste's compliance with the site's Environmental Permit is confirmed as part of Waste Organic's waste pre-acceptance and waste acceptance checks.

Ref	6 - Waste pre-acceptance, acceptance & tracking	Implementation
14	*If you use a bay every day you must clean it at least weekly. You must clean it more often (depending on the waste) if weekly cleans do not deal with the risk of vermin or fugitive emissions.*	The site is equipped with a waste storage bay which is cleaned on a weekly basis, as a minimum, as part of the site's ongoing maintenance.
15	*The waste reception area must be inside an enclosed building for the following:* • *if receiving, storing or pre-treating (for example, de-packaging food waste) as the waste may lead to fugitive emissions* • *for food waste* • *for all waste containing animal by-products.*	All food waste, regardless of whether it is packaged or unpackaged, and liquid waste is received within a dedicated waste reception building which is enclosed.
16	*You must design enclosed buildings with an air extraction that is capable of negative pressure within the waste reception area and have air-lock controls. You must make sure the ventilation extraction and air treatment is suitably designed and engineered.*	The enclosed waste reception hall operates under negative pressure, with a minimum of three air changes taking place per hour.

Ref	6 - Waste pre-acceptance, acceptance & tracking	Implementation
17	*You must collect and treat all emissions in an appropriately engineered abatement system or air suction system close to the source. For in vessel systems, you can use exhaust air to aerate composting piles before treatment and discharge.*	The air removed from the waste reception hall is directed to an odour abatement system (carbon filters) prior to emission to atmosphere. The individual tanks in the bunded tank farm are served by carbon filters to treat air displaced from the tanks prior to release to atmosphere. Vehicle tankers that remove the waste blended “soup” from the site also connect up to a carbon filter to treat the air displaced from the vehicle tanker whilst it is loading, prior to release to atmosphere.
18	*If you accept food and putrescible wastes, you must fit existing reception buildings with fast-acting roller shutter doors to allow delivery and other vehicles to enter and leave. You may need additional measures to minimise fugitive emissions, for example installing an airlock entry system.*	The enclosed waste reception hall is fitted with roller shutter doors. Additionally, the hall operates under negative pressure, with a minimum of three air changes taking place per hour.

Ref	6 - Waste pre-acceptance, acceptance & tracking	Implementation
19	*You must design and maintain buildings used for feedstock reception and storage in a way that minimises fugitive emissions.* *A reception building should have enough space to minimise the time waste is held before treatment, and to allow you to follow the first-in, first-out principle for waste treatment.* *You should operate an alternate bay system or single bay all-in, all-out approach.* *All bays used to segregate wastes must have defined and visibly clear storage demarcation boundaries.* *Where there is a likelihood you will generate bioaerosols and dust you must treat the air with a dust filter before releasing emissions.*	The waste reception hall is enclosed and equipped with roller shutter doors which are kept closed when waste loading is taking place. The waste reception hall operates under negative pressure, with a minimum of three air changes taking place per hour, which serves to reduce the potential of fugitive emissions to atmosphere. All wastes received at site are processed in accordance with the first-in, first-out principle of waste treatment. All waste received at site is processed within 24 hours under normal operating conditions.

Ref	6 - Waste pre-acceptance, acceptance & tracking	Implementation
	If you accept and store large volumes of ammonia-rich feedstock, for example poultry litter and manures, you must store it in a way that minimises the release of ammonia. You can do this by: • *covering it with a sheet or with an organic layer such as straw or compost to form a 'biofilter'* • *using a 3-sided walled area* *You may need additional measures to reduce odour or ammonia if your site is located in sensitive areas.*	
20	*You must design reception areas for easy cleaning and include contained drainage so you can collect wash-water separately for disposal or reuse.*	Waste reception areas are designed in a manner that facilitates easy cleaning. The floor of the waste reception hall is constructed of impermeable concrete and is served by a sealed drainage system. Any

Ref	6 - Waste pre-acceptance, acceptance & tracking	Implementation
		leachate collected by the drainage system shall be re-used in the “soup” production process
21	*If you are permitted to accept animal by-products you must:* • *segregate these from other waste* • *keep liquors and leachate separate and provide wheel-wash facilities for disinfecting delivery vehicles on exit from the reception building*	The site is permitted to accept and treat wastes containing animal by-products. All unpackaged and packaged solid biodegradable organic wastes, and liquid wastes have dedicated waste reception areas in an enclosed waste reception hall. The site is equipped with a wheel wash facility, which prevents tracking of ABP material off site. Any leachate or wheel wash water collected by the drainage system shall be re-used in the “soup” production process
22	*You must characterise wash-down water containing cleaning chemicals, for example disinfectants, and dispose of them appropriately.*	As stated above, any wheel wash water collected by the site’s sealed drainage system shall be re-used in the “soup” production process.
23	*For outside reception areas, you must have impermeable surfacing and a contained drainage system.*	The site undertakes the receipt of all biodegradable organic waste within an enclosed waste reception building. However, the external area

Ref	6 - Waste pre-acceptance, acceptance & tracking	Implementation
		of the site between the solid and liquid biodegradable organic waste treatment buildings is covered with impermeable concrete which features a sealed drainage system. This directs clean surface water into the surface water drain that serves Knowsthorpe Road, via a Class 1 oil interceptor with alarm. The exception to this is southern portion of the site where the site features made ground. This area of the site was previously used for inert waste storage and treatment but is currently redundant.
24	*You must minimise the time you store putrescible waste in reception before treatment and hold it for no longer than 5 working days. You must treat waste promptly and within 24 hours if there is risk of:* • *attracting vermin* • *causing fugitive emissions such as odour*	All waste received at site shall be processed as soon as is reasonably practicable. The maximum amount of time that the solid biodegradable organic waste shall be stored on site prior to processing is 24 hours.

Ref	6 - Waste pre-acceptance, acceptance & tracking	Implementation
	You can store green waste and agricultural wastes for longer providing you follow all other appropriate measures to prevent uncontrolled decomposition and emissions. *You may store stable waste material for longer periods as long as it does not degrade and is stored in a way that does not encourage vermin or result in fugitive emissions.* *Once offloaded, and as soon as is practicable to do so, you must assess the waste and verify it for acceptance, following your procedures.*	
25	*You must put non-conforming containers and wastes into quarantine and deal with them immediately. You must record all non-conformances.*	All non-conforming waste is quarantined and removed from site within 48 hours.

Ref	6 - Waste pre-acceptance, acceptance & tracking	Implementation
27	*If you identify a non-conforming waste during a spot check, you must take measures to prevent a recurrence (including contacting the customer).*	Rejection procedure information will be sent to all suppliers and signed by them before intake of any loads begin on-site. Non-conforming wastes shall be segregated from other conforming wastes prior to removal off-site within 48 hours.
	6.7 – Removing packaging and plastic	
1	*If you accept a waste load and only identify a non-conformance after the waste has been deposited, for example loose green waste with high levels of metal or plastic, you must remove and quarantine the contaminants.* *You must address the non-conformance with the waste producer as part of your waste acceptance procedures and record these events. You should tell them the actions you have taken, for example, removed it for disposal.*	All packaged food waste received at site undergoes de-packaging by means of an attritor. Any contaminants are quarantined and removed off-site within 48 hours. Where a non-conformance occurs, the waste producer shall be reminded of the rejection procedure information and provided with information pertaining to the actions taken to deal with the non-conforming waste.

Ref	6 - Waste pre-acceptance, acceptance & tracking	Implementation
2	*You must remove packaging and non-biodegradable packaging items that are not independently certified as industrially or home compostable (or both). You must do this before and during treatment to minimise the contamination of outputs.* *Non-packaging items include:* • *non-biodegradable materials integral to the product, for example tea bags* • *items used when consuming food or drink, for example straws, single-use tableware* • *plastic bags, used for example, in a kitchen caddy, food bin liners, or garden waste sacks* *You can accept industrially compostable packaging and non-packaging items that are independently certified as compliant with at least one of the following:*	The site is equipped with 2 No. attritors, which undertake de-packaging and maceration of received packaged biodegradable organic wastes.

Ref	6 - Waste pre-acceptance, acceptance & tracking	Implementation
	• *EN 13432* • *EN 14995* • *ASTM D6400* *You can accept home compostable packaging and non-packaging items that are independently certified as compliant with at least one of the following:* • *EN 17427* • *AS 5810-2010* • *NF T51-800* • *TUV Austria's certification requirements for home compostable packaging under their '0K compost HOME' scheme*	

Ref	6 - Waste pre-acceptance, acceptance & tracking	Implementation
3	*You must only accept separated loads of plastic packaging and non-biodegradable packaging items (for example, from closed loop sources such as festivals, coffee shops or individual buildings) if both of these apply, the:* • *packaging is independently certified as industrially or home compostable (or both)* • *load complies with your permit acceptance criteria*	Only packaged food wastes that conform to the European Waste Codes stipulated in the site's Environmental Permit shall be accepted onto site.

2.3 Waste storage, segregation, transfer and handling (Section 7.1, 7.5 -7.7 only.

These are appropriate measures for the waste storage, segregation, transfer and handling of wastes a regulated facility permitted to store, treat or transfer (or both) wastes suitable for biological treatment.

Ref	7 – Waste storage, segregation, transfer and handling	Implementation
	7.1 – Above ground tank and 'bulk' storage	

Ref	7 – Waste storage, segregation, transfer and handling	Implementation
1	*You must locate all above ground tanks used for storing and treating waste on an impermeable surface with secondary containment.*	The bunded tank farm is located on impermeable concrete. The separate water tank located next to the tank farm is a self-contained bunded tank constructed of GRP and is also located on impermeable concrete.
2	*You must have a drainage plan*	The site has a drainage plan in place, please see document reference: Waste Organics Drainage Plan v1
3	*You must use tanks and associated equipment that are suitably designed, constructed and maintained.*	All tanks and associated equipment are designed, constructed and maintained in accordance with industry best practice.
4	*You must do a risk assessment to validate the design and operation of bulk storage systems.*	A risk assessment was undertaken to validate the design and operation of the tank farm prior to waste feeding.
5	*You must make sure any new tanks and equipment are leakproof and working correctly before using them.*	Integrity checks pertaining to leaks and the correct operation of tanks are undertaken prior to use. Tank inspection and integrity tests are also undertaken as part of the site's Environmental Permit requirements.

Ref	7 – Waste storage, segregation, transfer and handling	Implementation
6	*You must cover all bulk storage tanks. Where possible you must contain and vent tanks and vessels through suitable abatement, or direct emission to a gas recovery system.*	All tanks located on site are enclosed. The liquid tanks in the tank farm, point are served by an odour control unit (carbon filters) to treat any air displaced from the tanks or tanker. This treated air is then discharged to atmosphere via the same external, vertical stack as that which serves the odour control unit for the solid waste reception area
7	*Storage systems must conform to the following CIRIA guidance:* • *C535 Above ground proprietary prefabricated oil storage tank systems (where relevant)* • *C736 Containment systems for the prevention of pollution*	The tank farm within the liquid waste reception / treatment building is bunded. The containment is designed to CIRIA C736 guidance, offering containment of 110% of the largest tank by volume. The separate water tank located next to the tank farm is a self-contained bunded tank constructed of GRP.
8	*You must locate bulk storage vessels on an impermeable surface which is resistant to the material being stored. The surface must have self contained drainage to prevent any spillage entering the storage systems or escaping off site. Impermeable surfaces must have sealed construction joints.*	The bunded tank farm is located on impermeable concrete. The separate water tank located next to the tank farm is a self-contained bunded tank constructed of GRP. The site is equipped with a sealed drainage system. The sealed drainage system in the solid and liquid waste reception and treatment buildings prevent any liquid from leaving the building. All liquid waste collected is used in the “soup” making process such that no liquid from the building leaves site

Ref	7 – Waste storage, segregation, transfer and handling	Implementation
		other than as part of the “soup”.
9	*Secondary containment (bunds) must:* • *be constructed to CIRIA 736 Containment systems for the prevention of pollution* • *have regular visual inspections – you must pump out or otherwise remove any contents under manual control after checking for contamination* • *be fitted with a high level probe and an alarm* • *have tanker connection points within the bund or provide adequate containment for spillages or leakage* • *have programmed engineering inspections (extending to water testing if structural integrity is in doubt)* • *be emptied of rainwater regularly to maintain the containment capacity*	The secondary containment for the bunded tank farm is designed to CIRIA 736 guidance. The tanks are equipped with the following features: • Are fitted with a high level probes and alarms. • Are equipped with tanker connection points within the bund • Are subjected to programmed engineering inspections as part of site maintenance. • Are subjected to regular visual inspections to assess the tanks’ integrity. • The tanks are enclosed, with processing taking place in a sealed enclosed building, so rainwater ingress does not occur.

Ref	7 – Waste storage, segregation, transfer and handling	Implementation
10	*You must be able to close all connections to vessels, tanks and secondary containment using suitable valves. You must fit a valve close to the tank if you have bottom outlets and have at least 2 isolation points in case of valve failure.*	All waste storage tanks are fitted with suitable valves.
11	*You must direct overflow pipes to a contained drainage system (for example the relevant secondary containment) or to another vessel where suitable control measures are in place.*	The waste reception hall is equipped with a sealed drainage system and covered sump.
	7.5 – Transfer of waste into and from sealed tankers and containers	
1	*You must transfer the waste from or to a tanker, or to a drum or tank, in a dedicated area.*	All liquid waste is transferred via tanker to tank, or tank to tanker.
2	*You must have a documented process and make sure staff are trained on how to complete checks and transfers*	All staff are appropriately trained on how to conduct waste acceptance checks and dispatch of material offsite.
3	*Your staff must supervise tanker discharges or transfers.*	The liquid waste reception process and the transfer of the “soup” from tank to tanker operations are overseen by site operators.

Ref	7 – Waste storage, segregation, transfer and handling	Implementation
	You should book in tankers and allow the appropriate amount of time for safe transfer	
4	*You must have a system to prevent a vehicle pulling away whilst still coupled. You must have measures for making sure couplings are correctly fitted. This will prevent couplings from loosening or becoming detached.*	All vehicles are stationary whilst the material loading/unloading process takes place. Each tank is fitted with a snap-hook valve, which ensure that if a vehicle does pull away whilst still coupled to the tank, no damage will be done to the tank's couplings.
5	*You must provide, maintain and clean your own couplings to guarantee their integrity and fitness. You must also:* • *make sure that a coupling can withstand the maximum shut valve pressure of the transfer pump* • *maintain a sound coupling at each end of the transfer hose, even when a gravity feed system is in place, and you must protect the transfer hose*	Couplings are inspected as part of the site's robust maintenance regime to ensure ongoing effectiveness.

Ref	7 – Waste storage, segregation, transfer and handling	Implementation
	• *contain all leaks or drips from coupling devices using as a minimum drip trays*	
6	*You must make sure that transfers from tankers only take place after you have completed waste acceptance checks and then only with the approval of a responsible person. You must record:* • *which batch or load of material is for transfer* • *the receiving storage vessel* • *the equipment required, including spillage control and recovery equipment* • *any special provisions relevant to that batch or load, including minimising fugitive emissions*	Waste Organics can confirm that liquid waste transfer only takes place once the site operative has performed the necessary waste acceptance checks.
7	*You must have measures for preventing over filling such as a shut-off valve*	Each tank is equipped with a shut off valve to prevent incidences of overfilling.

Ref	7 – Waste storage, segregation, transfer and handling	Implementation
8	*You must only transfer waste after completing a suitable verification and after compatibility testing*	All feedstock is received from reputable suppliers. The feedstock has undergone pre-acceptance checks. All blended “soup” is transferred off-site following processing.
9	*You must unload tankers containing animal by-products using a sealed pipe. You must do this in a building fitted with an appropriately designed and engineered air collection and abatement system*	All tankers unload the liquid biodegradable organic waste by means of a sealed pipe. The individual tanks in the tank farm (within the enclosed waste reception building) are served by carbon filters to treat air displaced from the tanks prior to release to atmosphere. Vehicle tankers that remove the waste blended “soup” from the site also connect up to a carbon filter to treat the air displaced from the vehicle tanker whilst it is loading, prior to release to atmosphere.
10.	*You must carry out routine maintenance checks on pump seals and filter pots*	Maintenance checks on pump seals and filter pots are undertaken as part of the site’s maintenance regime.
11	*You must have emergency containment areas for leaking vehicles to prevent pollution.*	The tank farm is fully bunded to ensure containment of the liquid wastes or substances leaking from vehicles. Each loading connection

Ref	7 – Waste storage, segregation, transfer and handling	Implementation
	You should have a lockable isolating valve fitted to the loading connection. This is kept locked during periods when the unloading points are not supervised.	point is fitted with a lockable isolating valve, which is kept locked during periods when unloading is not taking place.
13	*You must have systems and procedures for making sure that wastes for transfer comply with The Carriage of Dangerous Goods and Use of Transportable Pressure Equipment Regulations 2009 (CDG) when they are packaged and transported.*	The site ensures that all “soup” transferred off-site for further treatment is done so by means of tanker, and in accordance with the requirements of The Carriage of Dangerous Goods and Use of Transportable Pressure Equipment Regulations 2009.
14	*You must retain spillages within the contained areas and collect those promptly using pumps or absorbents. You must record any spillages.*	The tank farm is fully bunded to ensure containment of the liquid wastes. The containment is designed to CIRIA C736 guidance, offering containment of 110% of the largest tank by volume. The separate water tank located next to the tank farm is a self-contained bunded tank constructed of GRP. The floor of the liquid waste hall is constructed of impermeable concrete and shall be served by a sealed drainage system. Any liquid waste collected by the drainage system shall be re-used in the “soup” production process.

Ref	7 – Waste storage, segregation, transfer and handling	Implementation
15	*If you use rotary type pumps, they must be equipped with a pressure control system and safety valve.*	All pumps used during the waste unloading/loading process are equipped with a pressure control system and safety valve.
16	*You must pump liquids and sludges instead of using open movement.*	All liquids received at site and the “soup” transferred off site following processing are pumpable.
	7.6 – Drainage	
1	*You must inspect on a weekly basis all drainage channels, aeration channels and collection sumps to identify blockages caused by debris and condensate.*	All drainage and aeration channels and collection sumps are inspected on a weekly basis as part of the site’s maintenance regime.
2	*You must remove debris and clean the channels and sumps to prevent odour, pest infestations and maximise drainage and air flow through aeration channels.*	All channels and sumps are cleaned and cleared of debris on a regular basis.
	7.7– Tank inspection and maintenance	
1	*You must monitor substrate levels in all storage tanks, vessels and lagoons used to hold liquids, sludge’s and digestate.*	Substrate levels of all liquid storage tanks are continuously monitored.

Ref	7 – Waste storage, segregation, transfer and handling	Implementation
2	*Storage vessels used for liquids, sludges and digestate must have a freeboard as recommended by the plant manufacturer.*	All liquid waste storage tanks operate with a freeboard.
3	*You must equip all storage tanks with an automatic level monitoring system and an associated alarm and cut-out out system to protect against over-filling. These systems must be sufficiently robust (for example, be able to work if sludge and foam are present) and regularly maintained.*	All liquid waste storage tanks operate with fill level sensors and an associated alarm and cut out system to prevent overfilling from occurring.
4	*A competent person must inspect tanks, pipework and fittings, following a written programme of inspection. A competent person must also determine the scope and frequency of the examination. You must work out how often to carry out these internal examinations using a risk assessment approach. This should be based on the:*	All tanks, pipework and fittings shall be inspected by a technically competent external party.

Ref	7 – Waste storage, segregation, transfer and handling	Implementation
	• *design, specified design life and intended use of tank, pipework or fittings* • *age, maintenance and service history* • *known and potential damage mechanisms and their rates of occurrence* • *operational and thermal stresses* • *influence of cyclic and pressure loadings* • *bio-chemical influence of the substrate stored or carried*	
5	*You must act on the results of all inspections and carry out any necessary repairs to make sure the tanks remain fit for service. You must keep records of the results of inspection and any repairs.*	All necessary repairs identified from the tank inspections shall be undertaken as soon as is practicably possible. Records pertaining to the results of inspections and any repairs undertaken shall be maintained.
6	*You must have systems in place to make sure that loading, unloading and storage are safe, considering any associated risks. This can include:*	Loading and unloading of liquid wastes is carried out in accordance with section 2.2 of OP01 – Waste Acceptance Procedure (unloading)

Ref	7 – Waste storage, segregation, transfer and handling	Implementation
	• *having pipework and instrumentation diagrams* • *using ticketing systems* • *using key locked coupling systems* • *having colour coded points, fittings and hoses* • *using specific coupling or hose sizes for certain waste transfers*	and section 2.3 of OP02 – Waste Treatment Procedure (loading following waste processing).
8	*The following must be fit for purpose and resistant to the wastes being stored and carried:* • *pipes* • *hoses* • *connections* • *couplings* • *transfer lines*	Waste Organics can confirm that all pipes, hoses, connections, couplings, and transfer lines installed on site are fit for purpose and suitable for transferring pumpable biodegradable organic wastes.

Ref	7 – Waste storage, segregation, transfer and handling	Implementation
9	*You must use a suitable pipework coding system (for example RAL European standard colour coding).*	The site has in place a suitable pipework coding system.
10	*You must monitor the transfer of liquids and sludges between tanks and this must be linked to an alarm or cut-out system.*	The transfer of liquids between tanks is continuously monitored. The tanks are equipped with fill level sensors.
11	*Your staff must supervise loading and unloading activities, either directly or using CCTV.*	Loading and unloading activities are supervised by a site operative. The site operates with comprehensive CCTV covering the site.
12	*You must work out how often to carry out external inspections using non-destructive testing (NDT) methods.*	Visual assessment of tank integrity, condition and pipework is conducted no less than monthly to ensure the continuing integrity and fitness for purpose of their construction, and the inspection and any necessary maintenance will be recorded in the site diary. In the event of any damage occurring which breaches the integrity of the engineered containment so that it no longer meets the specified standards, the licence holder will cease importing waste into or treating waste in the affected area, will notify the EA immediately, and will not

Ref	7 – Waste storage, segregation, transfer and handling	Implementation
		recommence importing waste into or treating waste in the affected area until it has been repaired to a standard at least as good as the original specification.
13	*You must schedule removing grit and sediment from storage tanks and lagoons at appropriate intervals, determined by a written programme of inspection. Grit and sediments removed from tanks and grit traps will be a waste when discarded and therefore subject to waste regulatory control. You must not deposit them into lagoons.*	Any residual grit and sediment from storage tanks shall be disposed of in accordance with best industry practice.
	6.7 – Removing packaging and plastic	
1	*If you accept a waste load and only identify a non-conformance after the waste has been deposited, for example loose green waste with high levels of metal or plastic, you must remove and quarantine the contaminants.*	All packaged food waste received at site undergoes de-packaging by means of an attritor. Any contaminants are quarantined and removed off-site within 48 hours.

Ref	7 – Waste storage, segregation, transfer and handling	Implementation
	You must address the non-conformance with the waste producer as part of your waste acceptance procedures and record these events. You should tell them the actions you have taken, for example, removed it for disposal.	Where a non-conformance occurs, the waste producer shall be reminded of the rejection procedure information and provided with information pertaining to the actions taken to deal with the non-conforming waste.
2	*You must remove packaging and non-biodegradable packaging items that are not independently certified as industrially or home compostable (or both). You must do this before and during treatment to minimise the contamination of outputs.* *Non-packaging items include:* • *non-biodegradable materials integral to the product, for example tea bags* • *items used when consuming food or drink, for example straws, single-use tableware*	The site is equipped with 2 No. attritors, which undertake de-packaging and maceration of received packaged food wastes.

Ref	7 – Waste storage, segregation, transfer and handling	Implementation
	• *plastic bags, used for example, in a kitchen caddy, food bin liners, or garden waste sacks* *You can accept industrially compostable packaging and non-packaging items that are independently certified as compliant with at least one of the following:* • *EN 13432* • *EN 14995* • *ASTM D6400* *You can accept home compostable packaging and non-packaging items that are independently certified as compliant with at least one of the following:* • *EN 17427* • *AS 5810-2010* • *NF T51-800*	

Ref	7 – Waste storage, segregation, transfer and handling	Implementation
	• *TUV Austria's certification requirements for home compostable packaging under their '0K compost HOME' scheme*	
3	*You must only accept separated loads of plastic packaging and non-biodegradable packaging items (for example, from closed loop sources such as festivals, coffee shops or individual buildings) if both of these apply, the:* • *packaging is independently certified as industrially or home compostable (or both)* • *load complies with your permit acceptance criteria*	Only packaged food wastes that conform to the European Waste Codes stipulated in the site's Environmental Permit shall be accepted onto site.

2.4 Waste treatment (Section 8.1 - 8.4 only)

These are appropriate measures for the waste storage, segregation, transfer and handling of wastes a regulated facility permitted to store, treat or transfer (or both) wastes suitable for biological treatment.

Ref	8 – Waste treatment	Implementation
	8.1 – Abnormal operating conditions	
1	*You must assess the likelihood of abnormal operating conditions. You must make sure you continue to comply with permit conditions by taking steps to prevent, alert and mitigate these events. Abnormal operating conditions include:* • *unexpected releases or loss of containment* • *start up* • *unplanned stoppages and breakdowns* • *shutdown*	The site has in place a number of measures to reduce the likelihood of abnormal operating conditions being implemented, and to ensure continued compliance with the environmental permit. **Unexpected release or loss of containment.** All areas of impermeable concrete, sealed drainage systems, covered buildings roofed areas, fixed bays and other containers, and storage areas: shall be inspected no less frequently than monthly, to ensure the continuing integrity and fitness for purpose of their construction, and the inspection and any necessary maintenance will be recorded in the site diary.

Ref	8 – Waste treatment	Implementation
		In the unlikely event that site experiences a sudden loss of containment, or of any damage occurring which breaches the integrity of the engineered containment so that it no longer meets the specified standards, the licence holder will cease importing waste into or treating waste in the affected area, will notify the EA immediately, and will not recommence importing waste into or treating waste in the affected area until it has been repaired to a standard at least as good as the original specification. The drainage system shall be closed to prevent release of process water into the surrounding environment. **Start up** All plant and equipment is subjected to regular maintenance in line with manufacturer's recommendations to minimise the risk of a start up failure. In the event of a critical item of plant failing to start, Waste Organics will cease importing waste into or treating waste if necessary

Ref	8 – Waste treatment	Implementation
		and will not recommence importing waste into or treating waste until the affected plant has been repaired or replaced. **Unplanned stoppages, breakdowns and shutdowns** Unplanned stoppages, breakdowns and shutdowns are minimised through the implementation of a robust maintenance schedule, developed in line with manufacturer's recommendations. In the event of an unplanned stoppage or breakdown occurring which is critical to the site's processing activities, Waste Organics will cease importing waste into or treating waste if necessary and will not recommence importing waste into or treating waste until the affected plant has been repaired or replaced.
8.2 – Pre-treatment		
1	*You must make sure you carry out particle size reduction where required:*	The solid waste which has been deposited an accepted on to site is transferred into one of two attritors via mobile plant for treatment. The

Ref	8 – Waste treatment	Implementation
	• *by the animal by-products regulations for sanitisation or pasteurisation* • *to optimise substrate characteristics for effective and efficient processing*	waste is deposited into a hopper which feeds the attritors. The purpose of the attritors is to reduce the particle size of the solid waste to make it pumpable and to remove any packaging from the waste. The packaging removed is stored in sealed containers prior to removal from site. The pumpable waste is mixed with waste liquid collected in the drainage pit from the waste reception hall as required before being pumped into the mixing tank in the tank farm. It should be noted that the pumpable “soup” produced as the end product for the site shall be transferred to anaerobic digestion sites for further treatment. This includes any further pasteurisation/sanitisation that may be required to meet the particle size and temperature requirements of the animal by-products regulations.

Ref	8 – Waste treatment	Implementation
2	*You must make sure that particle size reduction does not simply result in smaller contaminants entering the biological treatment process.*	All particle size reduction undertaken on solid waste results in the production of a pumpable substrate, which can then be mixed with liquid wastes.
3	*You must also:* • *apply the correct technology to pre-treat the waste to provide optimal substrate characteristics* • *retain the correct biological conditions to biodegrade the feedstock into an output that meets expectations and is suitable for its intended end use* • *comply with additional regulatory requirements, for example, animal by-products regulations*	Site operators control the blending process to ensure a “soup” that is suitable for onward anaerobic digestion is produced. The “soup” will serve as feedstock for the receiving anaerobic digestion facility. From here, the “soup” shall be subjected to anaerobic digestion under the correct biological conditions, and handled in accordance with the animal by-products regulations.
4	*You must carry out the pre-treatment of putrescible wastes in a suitably designed building. This must have an air ventilation and extraction system designed to make sure you comply with any*	The solid biodegradable waste reception hall is enclosed, and features an air extraction system which ensures the building operates under negative pressure. This prevents air inside the building escaping via the

Ref	8 – Waste treatment	Implementation
	associated emission limit in your permit. The ventilation and extraction system must be connected to an appropriately engineered air abatement system or gas recovery plant. Putrescible wastes include odorous wastes, ammonia-rich wastes and wastes containing animal by-products.	roller shutter door when opened. It also ensures that there are three exchanges per hour in the building. The air removed from the building is passed through an odour control unit, consisting of a series of carbon filter. The odour control unit is located with the building on site. The air that passes through the odour control unit is then discharged to atmosphere via an external, vertical stack. The liquid tanks in the tank farm, and the “soup” collection point are served by the same odour control unit as the solid waste reception and treatment building to treat any air displaced from the tanks or tanker. This treated air is then discharged to atmosphere via the same external, vertical stack as that which serves the odour control unit for the solid waste reception area.

Ref	8 – Waste treatment	Implementation
5	*You must demonstrate that all process equipment is made of materials suitable for use and is being used according to its design capability and the manufacturers' design life.*	All process equipment employed on site is manufactured and installed in accordance with industry best practice. The design life of the facility has been factored in during the plant design stage.
6	*A qualified and competent person must justify and verify the use of operating plant and equipment beyond its design life, to demonstrate there is no additional risk of failure.*	Waste Organics shall ensure that an appropriately qualified third-party undertake inspections of operating plant and equipment as necessary, in order to demonstrate that there is no risk of failure.
7	*You must remove all non-compostable plastic and other contaminants in the feedstock, or reduce them to levels that are as low as reasonably practicable.*	De-packaging of received packaging food waste is undertaken through the use of 2. No attritors on site.
8	*You must not rely solely on post-treatment technology to remove known contaminants. Where you use hammer mills to treat packaged waste you must take additional measures to make sure that you remove non-compostable or digestible plastics before or during the process.*	Plastic and/or other contaminants are removed at the front-end of the treatment process insofar as possible through the site's waste acceptance checks. The site's 2 No. attritors undertake de-packaging of food wastes received in a packaged form.

Ref	8 – Waste treatment	Implementation
9	*You must take measures to remove any remaining non-compostable or digestible contaminants from the final material.*	The final material is a pumpable substrate suitable for anaerobic digestion, with limited potential for visible or digestible contaminants to remain in the material. It is anticipated that waste will undergo further refinement upon acceptance at the AD facility.
10	*You must be able to demonstrate the removal technology is effective at removing contaminants.*	The site's waste acceptance procedures and 2 No. attritors act as the site's methods of contaminant removal. The attritors are maintained in accordance with the manufacturer's recommendations.
11	*You must consider your pre-treatment requirements at the design stage. Pre-treatment methods must give you the flexibility you need to process the types of feedstock you plan to accept at the facility.*	The pre-treatment and treatment requirements for incoming feedstock have been considered during the design stage of the plant.
12	*Pre-treating waste feedstock may be done off-site from a treatment facility but there must be a process to ensure that feedstock is of a high quality.*	The treatment of feedstock received at site results in the production of a "soup" for off-site treatment via anaerobic digestion.
	8.3 – Process monitoring systems	

Ref	8 – Waste treatment	Implementation
1	*You must install and operate a manual or automatic monitoring system that supports effective operational management and minimises operational difficulties. For example by displaying (visually and audibly) early warning signals to prevent system failures.*	All liquid waste reception tanks are equipped with fill level sensors. Site operates supervise the unloading and loading of tankers.
2	*You must calibrate monitoring equipment and maintain your plant and equipment in line with manufacturers' recommendations and your maintenance and inspection programme. This includes, for example, doing daily and weekly inspection checks and holding records of completion.*	All items of plant are maintained in line with the manufacturer's recommendations. The on-site weighbridge is calibrated annually by a specialist third-party.
	8.4– Mechanical treatment	
1	*You must segregate and condition the waste inputs before biological treatment. This may include:* • *using shredders for opening bags*	Solid packaged and unpackaged biodegradable organic waste are stored on the floor of the waste reception building prior to processing. From here, it is loaded into a series of de-packaging lines and attritors to remove packaging and facilitate particle size reduction.

Ref	8 – Waste treatment	Implementation
	• *using metal separators to extract undesirable components that might obstruct later processes* • *using sieves or shredders to optimise particle size and segregate biodegradable fractions* • *using air separation to segregate high calorific materials such as textiles, plastics and paper* • *homogenising materials* • *sterilising waste in an autoclave – before mechanical treatment*	

2.5 Outputs (Section 9.1 only)

Ref	9– Outputs	Implementation
	9.1 – Record keeping for treatment outputs and residues	
1	*You must record in the waste tracking system:* • *that you have treated a waste* • *what output materials you have produced and their weight* • *what the treatment residues are and their weight*	The following information shall be recorded prior to dispatch of material offsite: • The EWC code that the material is to be dispatched under. • The nature of the output materials and their weight.
2	*You must keep records of recovered and certified 'non-waste' materials leaving the site, including the:* • *type of material* • *batch number* • *date of export off-site* • *tonnage exported off-site* • *area dispatched to*	Waste Organics does not anticipate any non-waste materials leaving the site. If any certified 'non-waste' materials leave the site, the following information shall be recorded: • type of material • batch number • date of export off-site • tonnage exported off-site • area dispatched to

2.6 Emissions control (All sections excluding 11.7)

These are appropriate measures for the emissions control in place at a regulated facility permitted to store, treat or transfer (or both) wastes suitable for biological treatment.

Ref	11 – Emissions Control	Implementation
	11.1 – Emissions Inventory	
1	*You must identify, characterise and control all emissions from your activities that may cause pollution. This includes all emissions to air and water (including emissions to sewer) from your facility.*	Waste Organics recognise all sources of potential emissions, including (but not limited to): • Dust from tipping and loading waste • Odour from putrescible or aged waste • Leachate or run-off from storage areas • Noise from plant and vehicle movements The nature of each emission is understood, i.e., what it consists of, how often it occurs, and how it could affect: • Air quality • Water bodies or drains • Nearby residents or businesses
2	*Your emissions inventory must include information about the relevant characteristics of the emission to air and water, such as:* • *flammability, lower and higher explosive limits and reactivity*	

Ref	11 – Emissions Control	Implementation
	• *other substances present that may affect the waste gas treatment system or plant safety (for example, oxygen, nitrogen, water vapour, dust)* • *average and maximum values and variability of flow, pH, temperature, and conductivity* • *average and maximum concentration and load values of relevant substances and their variability – for example, COD and TOC, nitrogen species, phosphorus, metals, priority substances or micro pollutants speciated organic compounds and ammonia* • *data on bio eliminability – for example, BOD, BOD to COD ratio, Zahn Wellens test, biological inhibition potential (such as, inhibition of activated sludge)*	For example, dust may contain fine particles that irritate breathing, or a leachate spill may contain harmful contaminants. Controls and mitigation measures are in place to prevent or reduce pollution, including (but not limited to): • Regular site cleaning to prevent build-up of dust. • Rejecting odorous waste • Ensuring proper drainage and impermeable surfaces • Regular inspections and maintenance of plant and infrastructure • Having emergency procedures for spillages or fires
11.2 – Emissions monitoring and limits		

Ref	11 – Emissions Control	Implementation
1	*Where you are required to monitor emissions to comply with the requirements of your environmental permit you must follow our monitoring guidance.*	Any emissions that are required to be monitored shall be done so in accordance with the monitoring guidance set out in the site's environmental permit. The site has an emissions abatement system in place to minimise the risk of emissions to the environment, as set out below: The solid biodegradable waste reception hall features an air extraction system which ensures the building operates under negative pressure. This prevents air inside the building escaping via the roller shutter door when opened. It also ensures that there are three exchanges per hour in the building. The air removed from the building is passed through an odour control unit, consisting of a series of carbon filter. The odour control unit is located with the building on site. The air that passes through the odour control unit is then discharged to atmosphere via an external, vertical stack.
	For relevant emissions to water or sewer identified by the emissions inventory, you must monitor key process parameters (for example, waste water flow, pH, temperature, conductivity, or BOD) at key locations. For example, these could either be at the: • *inlet or outlet (or both) of the pre treatment* • *inlet to the final treatment* • *point where the emission leaves the facility boundary*	

Ref	11 – Emissions Control	Implementation
		The liquid tanks in the tank farm, and the “soup” collection point are served by the same odour control unit that serves the solid waste reception and treatment building to treat any air displaced from the tanks or tanker. This treated air is then discharged to atmosphere via the same external, vertical stack as that which serves the odour control unit for the solid waste reception area.
11.3 – Meteorological Conditions		
1	*You must monitor and record meteorological conditions or have access to meteorological data for the site location. This is so you can forecast wind speed, air temperature and wind direction.*	Meteorological data is accessible for the site locations.
2	*You must put weather monitoring stations at appropriate locations on your site.*	The site shall install weather monitoring locations on site as required.
3	*You should calibrate meteorological monitoring equipment every 4 months or follow manufacturers’ recommendations.*	Any weather stations installed on site shall be calibrated every 4 months or in accordance with manufacturer’s recommendations.

Ref	11 – Emissions Control	Implementation
	11.4 – Bioaerosols	
1	*You must take measures to minimise the release of bioaerosols from your process.*	The site has a number of control measures in place to minimise the release of bioaerosols from the process. This includes • The processing of all wastes within an enclosed waste reception building. • The processing of all wastes within 24 hours of receipt. • Washing of the external concrete pad if deemed to be dusty or dirty. • Wheel washing of tankers prior to leaving site to minimise tracking of mud or debris onto the external portion of site or surrounding road network. • During periods of dry weather, site management will ensure action is taken to spray the roads using a sprayjet units, if deemed necessary by the Site Manager.
2	*You must document potential bioaerosol emission sources and identify measures to minimise their release. Measures include, for example:* • *processing waste promptly and monitoring it according to defined processing conditions* • *taking corrective measures to address unfavourable conditions* • *using slow-speed shredders in sensitive locations with misting devices fitted or carrying out these activities in covered areas*	

Ref	11 – Emissions Control	Implementation
	• *taking into account meteorological conditions when managing activities* • *avoiding activities such as turning and shredding in unfavourable meteorological conditions* • *stopping activities when the wind is blowing in the direction of sensitive receptors* • *dampening haul roads and processing areas and stopping activities when the wind is blowing in the direction of sensitive receptors* • *using static aeration and covering piles where possible and practicable*	
11.5 - Emissions of Odour		
1	*You must develop and implement an odour management plan.*	The site has the following measures in place to control emissions of odour:

Ref	11 – Emissions Control	Implementation
		The solid biodegradable waste reception hall features an air extraction system which ensures the building operates under negative pressure. This prevents air inside the building escaping via the roller shutter door when opened. It also ensures that there are three exchanges per hour in the building. The air removed from the building is passed through an odour control unit, consisting of a series of carbon filters. The odour control unit is located with the building on site. The air that passes through the odour control unit is then discharged to atmosphere via an external, vertical stack. The liquid tanks in the tank farm, and the “soup” collection point are served by the same odour control unit that serves the solid waste reception and treatment building to treat any air displaced from the tanks or tanker. This treated air is then discharged to atmosphere via the same external, vertical stack as that which serves the odour control unit for the solid waste reception area. The air extraction

Ref	11 – Emissions Control	Implementation
		system is connected to an odour control unit to remove odours from the air prior to release to atmosphere
	11.8 – Fugitive (diffuse emissions to air)	
1	*You must use appropriate measures to prevent emissions of odour, ammonia, dust, bioaerosols and particulates, mud and litter.*	Strategies for minimising emissions of odour, dust, and particulates, mud and litter are set out in EPR-C03 – Fugitive Emissions Management Plan and summarised below: **Odour** • Waste is processed within an enclosed building within 24 hours of receipt. • The waste reception building and on site tanks are equipped with odour abatement technology (series of carbon filters). **Dust and Mud**

Ref	11 – Emissions Control	Implementation
		• Dust generation attributable to vehicle movements will be controlled by the maintenance and mechanical sweeping of the site access road. • Mud and debris on access and haul roads shall be monitored daily by the Site Manager and cleaned when required. • During periods of dry weather, site management will ensure action is taken to spray the roads using a sprayjet units, if deemed necessary by the Site Manager. • All heavy goods vehicles and plant will be checked before use by the driver and hosed down as necessary to ensure that deposits of waste and debris are not carried outside the site. • A site speed limit of 10mph will be enforced for all vehicles to minimise the potential aerosolisation of dust into the atmosphere.

Ref	11 – Emissions Control	Implementation
		• Wheel wash facilities are in place in solid and liquid biodegradable organic waste processing areas ensuring vehicles are clean before leaving the site. **Litter** All waste inputs will be deposited in the waste reception areas and shall be stored within separated loading bays, piles or stacks, thus the risk of litter escaping site is low. Nevertheless, staff will inspect the site daily and remove any litter which has accumulated. Any actions required following a site inspection will be recorded in the on site reporting platform. In the event that litter does escape from the site, it shall be retrieved as soon as is practicable, and no later than one hour after the end of the working day.

Ref	11 – Emissions Control	Implementation
2	*You must design, operate and maintain plant in a way that prevents or minimises fugitive emissions to air, for example by:* • *limiting drop heights* • *using wind barriers* • *using gravity transfer rather than pumps* *This also applies to associated equipment such as:* • *screeners* • *shredders* • *conveyors* • *skips or containers* • *building fabric, including doors and windows* • *pipework and ducting*	The site is designed in a manner that minimises the risk of fugitive emissions to air. Control measures include: • Undertaking waste processing in an enclosed waste reception building. • Limiting drop heights of solid material. • Undertaking waste depackaging activities in an enclosed building. • The waste reception building is equipped with roller shutter doors which remain closed when waste deliveries are not being undertaken.

Ref	11 – Emissions Control	Implementation
3	*You must use high integrity components, for example seals or gaskets or leak test certificated PVRVs.*	All components used on site are of high integrity.
4	*You must have a programme of work that covers the maintenance of all plant and equipment. This must also include protective equipment such as curtains and fast action doors used to prevent and contain fugitive releases.*	The site has a maintenance procedure in place for all plant and equipment. The equipment is serviced and calibrated where required in accordance with manufacturer recommendations.
5	*You must identify the frequency of maintenance in your management system. As a minimum you must follow manufacturers' recommendations*	
6	*To identify and manage wastes that could cause, or are causing fugitive emissions to air, you must do:* • *pre-acceptance checks* • *waste acceptance checks* • *site inspections*	The site has in place: • EPR-OP01 – Waste Acceptance Procedure (including pre-acceptance checks). Site inspections are undertaken on a regular basis.

Ref	11 – Emissions Control	Implementation
7	*When you identify any such wastes you must:* • *take appropriate risk-assessed measures to prevent and control emissions* • *prioritise their treatment or transfer*	The site has in place an emissions abatement system to control emissions at source. All waste is processed as soon as is practicable and within 24 hours of receipt.
8	*Where necessary you must use a combination of one or more of the following measures:* • *cover any conveyers, hoppers, container that are outside* • *store and handle the waste within a suitably enclosed area (for example bays), a building or enclosed building* • *keep doors closed except when access is needed* • *use an appropriate abated air circulation or extraction system to keep enclosed buildings and equipment under adequate negative pressure, locating air extraction points close to potential emission sources* • *use fast-acting or 'airlock' doors that default to closed*	Both received liquid wastes and solid wastes are stored within specific waste storage areas. The waste reception hall is equipped with fast action roller shutter doors which are kept closed, except when waste is being delivered to, or transferred offsite. The enclosed waste reception hall operates under negative pressure, with a minimum of three air changes taking place per hour. The air that passes through the odour control unit (carbon

Ref	11 – Emissions Control	Implementation
	• *use suitable covers (these can include textile sheeting, synthetic membranes and organic materials such as straw and woodchip) – the choice of cover depends on the risk to receptors* *You should install localised containment, for example air extraction over a waste shredder, to minimise and treat air.*	filters) is then discharged to atmosphere via an external, vertical stack.
9	*You must review the integrity and containment effectiveness of any building, covers and contained air systems during commissioning. You must then do this periodically following manufacturers guidelines, or at least every 2 years.*	Waste Organics can confirm that the integrity of all infrastructure was reviewed during commissioning, and continues to be reviewed in accordance with manufacturers guidelines, or at least every 2 years, whichever is sooner.
11	*You must replace or repair damaged building, containers covers as soon as possible.*	Waste Organics can confirm that replacement or repair of damaged building, containers or covers shall be undertaken as soon as possible

Ref	11 – Emissions Control	Implementation
12	*You must stop using any vessel or tanks immediately if their integrity is compromised.*	Waste Organics can confirm that the use of vessels or tanks shall be stopped immediately if their integrity is compromised.
13	*You must regularly inspect and clean all waste storage and treatment areas and equipment, including conveyor belts. You must identify the frequency of inspection and cleaning in your management system.*	The site has in place • general housekeeping and inspection procedures which are maintained. Cleaning and disinfection of all surfaces that come into contact with waste (including containers) is undertaken on a regular basis.
14	*You must take measures to prevent plant and equipment, conveyors and pipes corroding. This includes using appropriate construction materials, corrosion inhibitors and regularly inspecting and maintaining plant.*	The site is designed in accordance with industry best practice, and uses appropriate construction material and corrosion inhibitors. Plant and equipment is subject to regular inspections and maintenance.
15	*You must consider dampening potential sources of fugitive dust emissions with water or fog, for example when turning open windrows or on areas where traffic moves.*	Measures to control potential dust emissions are set out below: • Site staff supervising individual material handling operations and unloading of waste shall, during the carrying out of those operations, undertake visual monitoring of aerial emissions. On

Ref	11 – Emissions Control	Implementation
		detection or notification of visible aerial emissions that are likely to be transported beyond the site boundary, immediate action shall be taken to stop the material handling operations giving rise to the emission and suppress the aerial emission from the material as required. The incident and the remedial action shall be recorded in the site diary. • Dust generation attributable to vehicle movements will be controlled by the maintenance and mechanical sweeping of the site access road. • A site speed limit of 10mph will be enforced for all vehicles to minimise the potential aerosolisation of dust into the atmosphere. • All materials handled on site shall be done so in a controlled manner, with consideration always given to the potential for dust generation.

Ref	11 – Emissions Control	Implementation
		• Most materials are handled within a building. Lots of liquids are received on site which generate no dust. •
16	*You must prevent or minimise litter*	**Litter** All waste inputs will be deposited in the waste reception areas and shall be stored within separated loading bays, piles or stacks, thus the risk of litter escaping site is low. Nevertheless, staff will inspect the site daily and remove any litter which has accumulated. Any actions required following a site inspection will be recorded in the on site reporting platform. In the event that litter does escape from the site, it shall be retrieved as soon as is practicable, and no later than one hour after the end of the working day.

Ref	11 – Emissions Control	Implementation
	11.9 – Leak Detection and Repair Plan	

As The site is undertaking the treatment of biodegradable organic wastes to produce a “soup” of blended biowastes suitable for AD to be transferred offsite. All “soup” leaving site is transferred to anaerobic digestion sites for further treatment.

Waste Organics can confirm that the anaerobic digestion facilities receiving the blended soup will have a leak detection and repair plan in place.

	11.10 – Pests	
1	*You must manage waste in a way that prevents pests and vermin.*	Measures will be implemented and maintained throughout the operational life of the site to control and monitor the presence of pests on the site. An inspection of the facility for pest infestations will be carried out in regular intervals by the site supervisor and will be recorded in the site diary. On detection or notification of pest infestations, or evidence of such, immediate action will be taken to secure the attendance of a professional pest control contractor, to eliminate the pest

Ref	11 – Emissions Control	Implementation
		infestation. The incident and the remedial action will be recorded in the site diary.
	11 – Emissions of noise and vibration	
1	*You must locate buildings, walls, and embankments so they act as noise screens.*	All waste processing takes place in an enclosed building which provides noise attenuation.
2	*You must use measures to control noise, including:* • *maintaining plant or equipment parts which may become more noisy as they wear out (for example, bearings, air handling plant, the building fabric, and specific noise attenuation kit associated with plant or machinery)* • *closing doors and windows to prevent noise breakthrough* • *avoiding noisy activities at night or early in the morning* • *minimising drop heights and the movement of waste and containers*	The site has a number of control measures in place to control noise at site: • All waste processing takes place in an enclosed building which provides noise attenuation. • The waste reception hall's roller shutter door is closed at all times, except when deliveries of, or transfer of, waste is being undertaken. • Vehicles are equipped with white noise reversing alarms. • Site speed limit of 10 mph enforced on site.

Ref	11 – Emissions Control	Implementation
	• *using white noise reversing alarms and enforcing the on site speed limit* • *using low noise rated equipment (for example, drive motors, fans, compressors, pumps)* • *adequately training and supervising staff* • *providing additional noise and vibration control equipment for specific noise sources (for example, noise reducers or attenuators, insulation or sound proof enclosures)*	• All staff are trained in procedures to conduct site operations in a manner which prevents excessive noise being generated.
11. 12 – Point source emissions to land and water (including indirect discharge to sewer)		
4	*Discharges to water or sewer must comply with the conditions of an environmental permit or trade effluent consent.* *Relevant sources of waste water include:* • *process water* • *condensate collected from a treatment process*	Clean surface water collected externally falls into the surface water drain serving Knowsthorpe Road, via a Class 1 oil interceptor with alarm.

Ref	11 – Emissions Control	Implementation
	• *waste compactor run-off* • *vehicle washing* • *vehicle oil and fuel leaks* • *washing containers, tanks and vessels* • *spills and leaks in waste storage areas* • *loading and unloading areas*	
5	*You must direct wash waters from cleaning vessels to foul sewer or a contained drainage system for off site disposal or re-circulation.* *You may need to pre treat the wash waters to meet any limits on the effluent discharge consent. The degree of recirculation will be limited by the water balance of your plant, the content of impurities, or characteristics of the water streams, for example nutrients.*	Clean surface water collected externally falls into the surface water drain serving Knowsthorpe Road, via a Class 1 oil interceptor with alarm. Dirty water resulting from waste processing activities is collected on site and re-circulated in the “soup” production process.

Ref	11 – Emissions Control	Implementation
	Discharges to surface water or storm drains (except for clean, uncontaminated rainwater) are not permitted. *You should use all of the following techniques:* • *segregate leachate seeping from compost piles and windrows from surface water* • *re-circulate process water streams – for example, from de-watering liquid digestate, or by using water streams like surface water run-off as much as possible* • *optimise the waste's moisture to minimise generating leachate*	
	11.13 – Fugitive emissions to land and water	

Ref	11 – Emissions Control	Implementation
1	*You must use appropriate measures to control potential fugitive emissions to land and water and make sure they do not cause pollution.*	The site has in place EPR-C03 – Fugitive Emissions Plan which sets out the measures in place to control fugitive emissions to land in the following areas: • Aerial Emissions of Dust, Fibres and Particulates • Odour • Control of Pest Infestations • Control of Scavenging Birds and Other Scavengers • Control of Litter • Process Water Control • 4.Rainwater Control
2	*You must have the following measures in place in operational areas:* • *an impermeable surface*	The site features sealed drainage systems. Those in the solid and liquid waste reception and treatment buildings prevent any liquid from leaving the building. All liquid waste collected is used in the “soup” making process such that no liquid from the building leaves

Ref	11 – Emissions Control	Implementation
	• *spill containment kerbs* • *sealed construction joints* • *connection to a contained drainage system*	site other than as part of the “soup”. The tank farm within the liquid waste reception / treatment building is bunded. The containment is designed to CIRIA C736 guidance, offering containment of 110% of the largest tank by volume. The separate water tank located next to the tank farm is a self-contained bunded tank constructed of GRP.
3	*You must collect and treat separately each water stream generated at the facility, for example, surface run off water or process water. Base how you separate it on the pollutant content and the treatment needed.*	All process water generated in the waste reception hall is recirculated into the blended “soup” production process. The external areas of the site are covered with impermeable concrete which features a sealed drainage system. This directs clean surface water into the surface water drain serving Knowsthorpe Road, via a Class 1 oil interceptor with alarm.
4	*You must make sure that you segregate uncontaminated water streams from those that need treatment*	All waste streams are appropriately segregated prior to treatment.
5	*You must use suitable drainage infrastructure to collect surface drainage from areas of the facility where you store,*	All process water generated in the waste reception hall is recirculated into the blended “soup” production process. The

Ref	11 – Emissions Control	Implementation
	handle and treat waste. You must also collect wash waters and any spillages. Depending on the pollutant content, you must either recirculate what you have collected or send it for further treatment.	external areas of the site are covered with impermeable concrete which features a sealed drainage system. This directs clean clean surface water into the surface water drain serving Knowsthorpe Road, via a Class 1 oil interceptor with alarm.
6	*You must take measures to prevent emissions from washing and cleaning activities, including:* • *directing liquid effluent and wash waters to foul sewer, or collecting them in a contained system for off site disposal – you must not discharge them to surface or storm drains* • *using biodegradable and non corrosive washing and cleaning products* • *storing all detergents, emulsifiers and other cleaning agents in suitable bunded or containment facilities within*	All process water generated in the waste reception hall is recirculated into the blended “soup” production process. The external areas of the site are covered with impermeable concrete which features a sealed drainage system. This directs clean surface water into the surface water drain serving Knowsthorpe Road, via a Class 1 oil interceptor with alarm.

Ref	11 – Emissions Control	Implementation
	a locked storage area, or in a building away from any surface water drains • *preparing working strength cleaning or disinfection solutions in contained areas of the site and never in areas that drain to the surface water or groundwater*	
10	*You must have measures to prevent pollution from the on-site storage, handling and use of oil and fuel*	The site is equipped with a sealed drainage system which prevents the potential of pollution to the wider environment.
11	*You must produce and implement a spillage response plan and train staff to follow it and test it.*	The site has in place a spill response plan which is periodically tested to verify the effectiveness of on-site operations.
12	*You must have procedures and associated training in place to make sure that you deal with spillages immediately.*	All spillages will be dealt with immediately. In the event of any potentially environmentally harmful leaks or spillages, the following remediation procedure will be implemented immediately and recorded: • Raise the alarm, giving brief details of location and product involved,

Ref	11 – Emissions Control	Implementation
		• Close down all isolated operations. • Isolate products lines. • Remove all sources of ignition. • Subsequent and appropriate action should be carried out to bring the emergency under control (if safe to do so) and prevent further risk to personnel on and off site and to the environment. • Close valves to minimise the release of fumes or substances. • Prevent spread of spilled product. • Take steps to contain and safely dispose of spilled product. • Determine the wind direction and any likely effects of fumes and decide whether emergency services are required.
13	*You must locate spill kits close to areas where spillages could occur and make sure relevant staff know how to use them. You must replenish the kits after use.*	Spill kits are available at point of use and staff are trained how to use them.

Ref	11 – Emissions Control	Implementation
14	*You must stop spillages from entering drains, channels, gullies, watercourses and unmade ground. You must have the following available, to use when needed:* • *proprietary sorbent materials* • *sand* • *booms or drain mats (or both)*	Drainage to areas of impermeable concrete will be provided by a sealed drainage system with impermeable components which do not leak and will ensure that: • No liquid will run off the processing area other than via the system, and; • All process liquids entering the system are collected for re-use on site.
15	*You must make sure your spillage response plan includes information about how to recover, handle and correctly dispose of all waste produced from a spillage.*	The response to section 11.13.13 above, details the site's response to a spillage occurring on site.
16	*For subsurface structures, you must:* • *establish and record the routes of all site drains and subsurface pipework* • *identify all sub surface sumps and storage vessels*	All subsurface structures are inspected and maintained in accordance with manufacturer's recommendations.

Ref	11 – Emissions Control	Implementation
	• *engineer systems to minimise leaks from pipes and make sure you can detect them quickly if they do occur, particularly for hazardous substances* • *provide secondary containment and leakage detection for sub surface pipework, sumps and storage vessels* • *establish an inspection and maintenance programme for all subsurface structures, for example, pressure tests, leak tests, material thickness checks or CCTV*	
17	*You must design appropriate surfaces and containment or drainage facilities for all operational areas, taking into account:* • *collection capacities* • *surface thicknesses* • *strength and reinforcement*	The site features sealed drainage systems. Those in the solid and liquid waste reception and treatment buildings prevent any liquid from leaving the building. All liquid waste collected is used in the "soup" making process such that no liquid from the building leaves site other than as part of the "soup". The tank farm within the liquid waste reception / treatment building is bunded. The containment is designed to CIRIA C736 guidance, offering containment of 110% of

Ref	11 – Emissions Control	Implementation
	• *falls (of the land)* • *materials of construction* • *permeability* • *resistance to chemical attack* • *inspection and maintenance procedures* • *available relevant standards of construction*	the largest tank by volume. The separate water tank located next to the tank farm is a self-contained bunded tank constructed of GRP. The external areas of the site are covered with impermeable concrete which features a sealed drainage system. This directs clean surface water into the surface water drain serving Knowsthorpe Road, via a Class 1 oil interceptor with alarm.
18	*You must have a documented inspection and maintenance programme to review the integrity of impermeable surfaces and water containment facilities. This must consider the plant and equipment manufacturers' recommended maintenance practices.*	The site has in place an inspection and maintenance programme for the site's sealed drainage system.

2.7 Process efficiency (Section 12.2 only – the site operates under a waste operation permit)

These are appropriate measures for the process efficiency control measures in place at a regulated facility permitted to store, treat or transfer (or both) wastes suitable for biological treatment.

Ref	12 – Raw Materials	Implementation
	12.2 – Raw Materials	
1	*You must keep a list of the raw materials you use at your facility and their properties. This includes materials and other substances that could have an environmental impact.*	Waste Organics maintains a register of raw materials used at the facilities.
2	*You must check if you can use raw materials new to the market that have less environmental impact. This must include, where possible, substituting raw materials with waste.*	Waste Organics will undertake a review of the raw materials it uses not less than annually. Where an alternative raw material is identified that has less environmental impact, Waste Organics shall implement the use of this material into its operating procedures.
3	*You must justify why you continue to use any substance which has a beneficial alternative.*	The use of any substance which continues to be used when a beneficial alternative has been identified shall be fully justified.
4	*You must have quality assurance procedures in place to control the content of raw materials.*	Waste Organics will undertake a review of the raw materials it uses not less than annually to ensure that they remain fit for purpose.