

Greenway Environmental Ltd,

Medway City Estate, Enterprise Close, Rochester, Kent, ME2 4LY

Permit Variation relating to:

Permit number: EPR/WP3036ZR

MARCH 2025

Ref: ROC001

Table of Contents

[NON-TECHNICAL SUMMARY 2](#_Toc191647861)

[Environmental Impacts of Proposed changes 4](#_Toc191647862)

[Emissions 4](#_Toc191647863)

[Emissions to Air 4](#_Toc191647864)

[Emissions to Water / Sewer 5](#_Toc191647865)

[Emissions to Land 5](#_Toc191647866)

[Odour 5](#_Toc191647867)

[Visual Impact 5](#_Toc191647868)

[Noise and Vibration 5](#_Toc191647869)

[Other Aspects 6](#_Toc191647870)

[Raw Material Usage 6](#_Toc191647871)

[Water Usage 6](#_Toc191647872)

[Waste 6](#_Toc191647873)

[Energy Efficiency 6](#_Toc191647874)

[Monitoring 6](#_Toc191647875)

[Infrastructure Monitoring 6](#_Toc191647876)

# NON-TECHNICAL SUMMARY

This variation is submitted to incorporate a number of changes to the existing permit EPR/WP3036ZR

Changes are as follows

**Removal of all current permitted activities, directly associated activities, and associated EWC codes**,

Addition of all new activities list, directly associated activity list, and associated EWC lists, as defined by document **ROC002 – Rochester Permit Variation V5**

All throughput and storage totals will be amended. The maximum storage on site at any one time will be 750 tonnes. The maximum amount accepted to site aggregated under all activities will be 28,000 tonnes. This will be made up of 18,000 tonnes of hazardous waste, and 10,000 tonnes of non-hazardous waste.

**Addition of Storage as an activity,** under R13, D15 for both hazardous and non-hazardous waste, with a maximum storage time of 6 months for all packaged waste with the exception of Aerosols, which will have limit of 3 months. All waste storage will be as per HSG71, and storage areas fully bunded to prevent escape of material in the event of spills or leaks. Flammable Waste will be stored in a separate area of the warehouse, divided using 60-minute fire rated cladding. Aerosols will be stored in a lockable container, will have adequate ventilation, and will be contained so as to prevent any projectiles.

**Addition of bulking and re-packaging as an activity,** under R12, D13, D14 for both hazardous and non-hazardous waste. We intend to bulk hazardous and non-hazardous waste (not together) in the areas marked on the site plan SPROC003A. As per our other facilities, volatile, hydrocarbon solvents will be bulked outdoors, in an area away from all waste storage. The area will have earth bonded points, and only 1 task at any one time will take place in the area, ie either loading a road vehicle, OR solvent packaging bulking. Never at the same time. Laboratory smalls will have its own separate area for re-packaging and listing, and is marked on the site plan.

**Addition of battery sorting as an activity,** under R4, R13, limited to 10 tonnes per day. This is required to ensure all battery waste types are stored safely and correctly. Batteries will be stored with WEEE, in a secure, lockable container

**Addition of container washing as an activity,** for both hazardous, and non-hazardous waste, under R3, R4 limited to 20 tonnes per day. We wish to re-use empty waste containers where possible as per our responsibilities within the waste hierarchy. Cleaning containers before re-use ensures safe use, removing the possibilities of chemical reaction. The washings will create a new waste stream at the facility, which will be categorised, labelled, recorded, and stored as per all other waste streams, and be subject to the same maximum storage times as received waste.

**Addition of Waste Transfer sorting for non-hazardous waste as an activity,** under R3, R4, R5, R13, limited to 50 tonnes per day.

**Addition of Raw Materials storage as a directly associated activity**. We will require Diesel fuel and lubricating oils for forklift truck operation, and detergents for general cleaning. Storage of these items will remain as per HSG71 guidance. Diesel Fuel is stored within a bunded cabinet to contain any spillages.

**Addition of crushing empty clean containers as a directly associated activity.**

In order to maximise our use of the waste hierarchy, the allowance to crush empty, clean, metal containers ensures that everything we can recycle, will be recycled. Containers will only be crushed if they cannot be re-used (for example, drums that are missing lids, or have sufficient damage so as they cannot be used safely for transportation of waste etc), and will have been accepted under the Container Washing activity.

# Environmental Impacts of Proposed changes

# Emissions

## [Emissions to Air](#_Toc272486000)

There are no emission points expected on site.

## [Emissions to Water / Sewer](#_Toc272486000)

All proposed activities will continue to be located on impermeable concrete hardstanding, with enclosed drains. All storage areas are fully bunded with separate tanks and drainage channels, and as such, there are no point source emissions to sewer, groundwaters, or surface waters. Site sewer connections are controlled by manual valves to prevent pollution escape.

## [Emissions to Land](#_Toc272486000)

No direct emissions to land will occur as a result of this variation.

## Odour

The potential to generate significant odour from the processes presented within this Variation application are considered to be low during site operation, and upon use of the techniques defined within the Odour Management Plan. Packaged waste remains sealed, and we will not accept malodorous waste. Packaged waste streams have the potential to generate odours which could be detectable without control measures. Upkeep and implementation of the measures within the Odour Management Plan ensure that the activity becomes low risk. We will no longer treat healthcare waste as part of this variation.

## Visual Impact

There will be no significant offsite visual impacts as a result of the changes proposed in this Variation Application.

## Noise and Vibration

Autoclaving and shredding are being removed, this variation proposal reduces noise coming from the facility

# Other Aspects

## Raw Material Usage

The proposed change would be the addition of diesel fuel to power Fork lift trucks on site, and as a consequence no change to the Site Condition Report is proposed. We would also require lubricating oils for the forklift trucks, and product detergents to be used for general cleaning.

## Water Usage

There are no changes to the water usage at the site. Container washing takes place currently and therefore our activity will not use additional water.

## Waste

Throughput has changed profile to encompass packaged waste streams. Storage via racking, and the flammable waste will be segregated from other waste streams by fire resistant walls.

## Energy Efficiency

No extra usage anticipated, usage will actually reduce due removal of existing plant.

# Monitoring

## Infrastructure Monitoring

The monitoring programme will cover the inspection and maintenance of the proposed facility, consisting of a combination of weekly, monthly and quarterly inspections, alongside more infrequent activities such as visual inspections, in line with systems currently applied at the rest of the site.