APPROPRIATE MEASURES ASSESSMENT - EPR/ZP3623LZ/A001

Unit 1, St Michaels Close, Aylesford, Kent, ME20 7BU

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Oaktree Environmental Ltd, Lime House, 2 Road Two, Winsford, Cheshire, CW7 3QZ
Tel: 01606 558833 | E-Mail: sales@oaktree-environmental.co.uk | Web: www.oaktree-environmental.co.uk

Registered in the UK | Company Number: 4850754

Oaktree Environmental
Waste, Planning & Environmental Consultants

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Summary

This document provides a standalone assessment of compliance with Appropriate Measures for permitted facilities issued by the Environment Agency (EA) for the proposed hazardous and non-hazardous waste treatment facility to be located at Unit 1, St Michaels Close, Aylesford, Kent, ME20, in support of permit application ref: EPR/ZP3623LZ/A001.

1 Non-hazardous and Inert Waste: Appropriate Measures

1.1 The following table demonstrates how the operator will comply with Appropriate Measures for Non-Hazardous and Inert Wastes.

Table 1 - Non-hazardous and Inert Waste Assessment – Appropriate Measures

Appropriate Measure	Site Assessment
1 - When appropriate measures apply	
1.1 – Who this guidance is for	Site is processing non-hazardous & inert wastes; it is therefore considered the appropriate measures guidance applies to the facility.
1.2 – Assessing appropriate measure for your site	This relevant sections of this guidance have been considered and discussed throughout this document. A separate BAT assessment has also been produced to accompany the application.
1.3 – Implementing appropriate measures at new facilities	The site will accept and process non-hazardous & inert wastes, it is therefore considered the appropriate measure guidance applies. A separate BAT assessment has also been produced to accompany the application.
1.4 – Site design and suitability	A climate change risk assessment has been produced as part of the Environmental Management System (EMS) which covers site operations and considers flood risk, drought, high temperatures and extreme weather events, these have been summarised below: Flood - The site is located within a Flood Zone 1 which is classified as having the lowest probability and risk of fluvial flooding. The site is located on previously developed land comprising a concrete pad and buildings. All water (surface and rainwater) drains are as detailed on the Site Layout Plan (Drawing No. Drought - Due to the nature of loads and how they are delivered, loaded, and unloaded at the site it is not anticipated that droughts or warm weather would have an impact on the operations.

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	In extreme cases such as a hosepipe ban or water shortage, the site will ensure there is additional water available to ensure the process can still function correctly. High temperatures - Due to the nature of loads accepted at the site and the method in which they are delivered, handled and stored; dry weather periods will not increase the risk of dust Adverse Weather events - The site will be set up to receive weather alerts from the Met Office for the following weather conditions which could cause a potential complaint off site or potential breach of permit. <u>Heavy rainfall</u> Vehicles exiting the site will undergo a more thorough check to ensure mud is not tracked off site. Should long periods of rainfall be likely, the site may consider hiring (as a result of daily inspections) a third-party road sweeper to cover the wet period to ensure surfaces are swept thoroughly throughout the day. <u>High winds</u> Due to the nature of loads and how they are delivered, loaded, and unloaded at the site, high winds (>30mph) will not impact the operations. <u>Dense fog (poor visibility)</u> The site will reduce operational intensity in conditions of poor visibility such as dense fog to reduce the risk of vehicle and tank collisions or other potential accidents. The site will construct firewalls in Building 3 to separate non-hazardous and hazardous waste streams. Building 3 will be open fronted to enable full access to waste storage area for

Appropriate Measure	Site Assessment
	firefighting, a site-specific Fire Prevention Plan (FPP) has been prepared to manage potential fire risks resulting from onsite operations. The site has been designed so that all access to buildings face inwards towards the centre of the site ensuring that they are facing away from surrounding receptors. The site has been designed to enable space for vehicle movements throughout the facility, As above, the site has limited storage capacities with Building 3 and will construct a fire break between the hazardous and non-hazardous waste streams subject to the repackaging activity to ensure waste can be segregated and to prevent cross contamination of waste streams. With regards to Building 2, waste streams will be discharged into the reception area as a single waste stream, there will never be any mixing of hazardous and non-hazardous waste streams. The capacity of wastes stored at the site will either be controlled by the capacity of storage vessels or restricted by the storage volumes and durations detailed within the Environmental Management System (EMS) and FPP. The operator will monitor stock levels within Building 3 as part of daily site inspections to ensure that they are not exceeding the limits, as material is stored within either sealed drums, intermediate Bulk containers (IBCs) or skips it is easy to identify and calculate the total storage volume within each storage area, in the event that capacity is reached, the operator can cease the acceptance of further loads until existing waste stored at the site has been removed. The site has been designed so that samples can be taken from any required tank within Building 1 or from the external vessels, the site will also implement an A1 emission point from Building 1, this is positioned towards the rear of the building and arrangements have been made to ensure that there is suitable space to access the exhaust flue at any time to undertake monitoring.
2- General Management appropriate measures	

Appropriate Measure	Site Assessment
2.1 – Management system	1. In accordance with Section 2.1 of the appropriate measures the site will operate in accordance with an EMS that has been prepared in accordance with the "Develop a management system: environmental permits" guidance published 01/02/2016, last updated 03/04/2023. The EMS covers all elements in relation to the site operations i.e. staffing roles & responsibilities, staff training and competence, performance measures and monitoring requirements and targets (where applicable), relevant legislation, guidance and appropriate measures, process descriptions & controls, maintenance programmes, emergency preparedness and contingency planning. Where required, the EMS references site-specific documents which provide more targeted details on the specific environmental control elements i.e. Odour, Fire, Air and Water emissions control etc. Senior management will review the EMS on an annual basis or sooner in the event of operational change or breach, any improvements will be initiated for action within 5 working days, with any required works carried out as soon as practicably possible which will be dependent on the availability of suitable licensed contractors. As detailed in 1.4 above, a climate change risk assessment has been produced as part of the Environmental Management System (EMS) which covers site operations to manage future risks. The operator will regularly review and consider cleaner technologies where appropriate. The site has prepared a standalone Residues Management Plan, Accident Management Plan, Site Condition Report, Site Layout Plan, Odour Management Plan. Fire Prevention Plan and Noise & Vibration Management to accompany the Permit Application. This will be reviewed and maintained in accordance with the EMS.

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	The EMS provides a schedule of inspection and maintenance for all plant, equipment and pollution control infrastructure i.e. buildings, containment walls, drainage, abatement systems. The EMS will include a document control procedure for all other management documents implemented at the site providing timeframes for periodic review along with the version control. The EMS provides details of the waste storage capacity, daily and annual throughputs and residence times for each waste storage area.
2.2 – Staff competence	1. The EMS details the staffing structure at the site, the site ensures that adequate number of staff are present on site to enable the operation of the facility, all staff are subject to introductory training and refresher training, details of any relevant training, qualifications and experience will be maintained. 2. The site will be operational Monday to Saturday, 24 hours a day. Outside of operational hours, the site will be monitored by an external monitoring company who have staff members contact details who they contact in the event of an emergency. Site Security infrastructure and monitoring are detailed within the EMS. 3. The design, installation and maintenance of infrastructure and plant will be carried out by a certified company. Maintenance will be carried out in accordance with manufacturer recommendations. 4. Appropriately qualified managers will be available at the site; in this instance this includes the operator who will be obtaining the relevant WAMITAB qualification to ensure that the site is operated in accordance with an EP and the relevant appropriate measures. The operator obtaining the required technical competence will ensure regular attendance at the site as they will be present on the site for most operational days.

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	5. All employees will be given induction training and subsequent regular training to identify those waste types which are permitted for acceptance at the site under the sites EP and those wastes which are not. This will include specific training to identify those common wastes which may be found following deposit and are not permitted at the site and will also include more obscure wastes and how to handle these wastes safely. All employees will be advised that they should refer any unrecognisable or unknown wastes to senior management, who should, in turn, follow procedures outlined in the EMS and/or contact the EA to agree a suitable method for removal. Training is provided to all site users who handle waste on site and those in charge of administration and reporting. In-depth training will also be provided to drivers responsible for collecting wastes from the site of production. Full waste acceptance procedures have been detailed in Section 3.
2.3 – Accident management plan (AMP)	1. The site operates in accordance with a site-specific AMP which provides details of how the site will manage any incidents or accidents at the site which could result in pollution. Accident control measures are summarised below. 2. The accident management plan identifies the following risks that the facility poses to human health and the environment. Risk of fire will be controlled by the following measures: • Site to be securely fenced and monitored 24-hours per day to prevent unauthorised access; • EMS in place containing appropriate measures to reduce risk of fire during routine operation; and, • FPP to be implemented during operations. Risk of vandalism will be controlled by the following measures: • Site to be securely fenced and monitored 24-hours per day to prevent unauthorised access.

Appropriate Measure	Site Assessment
	Risk of equipment malfunction or breakdown will be controlled by the following measures: • Planning Preventative maintenance schedules to be in place for all plant and machinery to be used; and, • Plant and equipment inspected regularly to ensure in good working order. Risk of spillages of wastes/fuels will be controlled by the following measures; The site has procedures in place for fuel/oil storage on site are as follows: • The containers used for the storage of hazardous fluids will be surrounded by a bund capable of containing a minimum of 110% of the volume of fuel stored in the tank; • All pipework and associated infrastructure will be enclosed within the bund; • A lock will be fitted to the tank valve to prevent unauthorised operation; • Any storage of oil will comply with the Control of Pollution (Oil Storage) (England) Regulations 2001 SI No.2954 or any subsequent legislation; • All valves and gauges on the tank will be constructed to prevent damage caused by frost; and, • The tanks will be clearly marked showing their capacity and product contained. Risk of flooding /abnormal weather such as heavy rainfall will be controlled by the following measures: • Site has drainage system in place to manage clean and foul drainage; • Site is located within Flood Zone 1 and therefore at lowest risk of flooding; and, • In the event of heavy rainfall, fully treated water will not be discharged to the sewerage system to prevent surcharging of the foul sewer. 3. The AMP provides a risk assessment in line with this section of the appropriate measures guidance. 4. The main factors taken into account are the: • scale and nature of the accident hazard presented by the facility and its activities • risks to areas of population and the environment (the receptors)

Appropriate Measure	Site Assessment
	5. The AMP details staffing roles and responsibilities at the site. Site Management will be responsible and involved in managing accidents. 6. Site management will be suitably trained in managing any accidents at the facility, they will also be responsible for implementing the AMP. 7. All new employees are subject to induction training so that they are aware of daily onsite procedures and emergency procedures detailed within the site-specific management plans including the EMS and AMP. 8. The AMP and management documentation for the site will include details of how the site communicates with relevant authorities, emergency services and receptors, how they implement emergency procedures, post incident procedures, contingency procedures and testing of all onsite procedures. 9. The site is located within a Flood Zone 1 so is unlikely to be impacted by a flood, In the event that a flood occurs at the site, the operator will inspect and assess the integrity of any affected plant, equipment, buildings or containment features that have been in contact with floodwater or groundwater. 10. The AMP implements measures to prevent events that may lead to an accident. 11. The AMP, FPP and Containment Report provide details of how the site will contain any process waters, firefighting water and spillages. The reception pit is located within a sealed area and wastes will not be released until the tanker is in position next to the pit, within Building 2. Should waste be spilled outside the area of the pit, this will drain to a large Aco drain in front of the hydro tip (Highest risk area). This will capture liquid, which will run into a pump chamber (alarmed) which will also pump liquids back into hydro tip. 12. Due to the location of the facility, it is not considered that the facility would be impacted by tidal surges and/or storm water flows.

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	13. N/A – no buffer storage capacity is required at the site. 14. The AMP and EMS outline the spillage procedure implemented at the site to minimise the risk of an accidental spill, the procedure is in place to ensure that no spill can enter watercourses, sewer or contaminate land. 15. The FPP details the procedures for containing firewater to prevent any release to land, water or sewer. The wider site is required to provide secondary containment which considers the industry standards detailed in CIRIA guidance C736 – Containment system for the prevention of pollution. The site will benefit from the construction of a concrete wall and/or kerbing around the perimeter of the site with a ramp at the site entrance to the yard which will create a sitewide containment area as detailed on the Site Layout Plan. The drainage system benefits from a penstock (shut off) valve which will be initiated during a fire event or tank failure to ensure the external yard is sealed. Buildings 1 & 2 are separately bunded to ensure that firewater does not enter the buildings during a fire event. 16. As detailed above, the wider site is required to provide secondary containment which considers the industry standards detailed in CIRIA guidance C736 – Containment system for the prevention of pollution, this includes containment for overflows, tank failures, tank wall penetrations and leaks from any plant or machinery. 17. The site is operational 24 hours a day Mon-Sat and benefits from CCTV, security gates and concrete walls to prevent unauthorised access and vandalism. The above security measures ensure that damage to equipment, theft, fly-tipping and arson are prevented. 18. A site-specific FPP has been produced in accordance with the following guidance *"Fire prevention plans: environmental permits"*. 19. Tanks are alarmed with level readings/alarms.

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	20. All equipment required in an emergency are made easy to access. As detailed within the EMS, all mobile and fixed plant on site including vehicles in the fleet are subject to annual manufacturer maintenance to ensure proper working order in the form of service contracts. Site management will undertake or delegate additional preventative maintenance checks on a more frequent basis i.e. daily, before, during and 1 hour at the end of each working day. The site will construct vehicle crash barriers (Armco, or similar) around building walls and bund walls used for the external tank containment to prevent any moving vehicles damaging buildings and plant or containment features. 21. The operator will maintain a record log of accidents, incidents, near misses, procedural changes, abnormal events and results of maintenance inspections (if an issue has been identified). Site management will investigate any incidents relating to the above and implements suitable measures to avoid reoccurrence. An inventory of substances that could have environmental consequences will be maintained, any substances which may result in environmental consequences will be suitably stored in accordance with recommended storage methods. Any chemicals used in the process will be stored within appropriately bunded areas/suitable cabinets. Hazardous liquid wastes will also be stored in appropriately bunded areas on-site. As such, there are sufficient pollution prevention measures in place, such that the risk to soil and ground water is considered negligible as there is not considered to be any significant pathway between source and receptor. 22. The Environment Agency (EA) will be notified without delay if the operator detects any event that are causing, or may cause, significant pollution, this will include the following: • Malfunction, • Breakdown of plant & equipment or operational failure,

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	• An accident, • Emission of substance not controlled by an emissions limit, • Breach of emission limit.
2.4 – Contingency plan and procedures	1. The site will implement contingency procedures to ensure that the operation will comply with all permit requirements. These contingency procedures cover how the site will handle and deal with emergency situations, fire, spillages, breakdowns & operational failure, staff shortages, adverse reactions, adverse weather conditions etc. Contingency procedures are detailed within the EMS. In addition to the above, site-specific management plans will be implemented at the site which cover contingency measures relating to a specific environmental issue such as odour & fire. 2. The EMS will outline contingency procedures relating to planned shutdowns at any waste management facilities which waste is sent. 3. Routine customers will be made aware of the operator's contingency plan and circumstances which would stop the site from accepting waste from them. 4. The site does not rely on regular sites or companies to take the waste. 5. The site will implement contingency procedures within the EMS for the diversion of waste to suitable alternative facilities in the event that permitted limits are exceed or storage procedures are compromised. The site accepts pre-booked waste which enables them to control the levels of waste accepted at the facility and ensure that permitted levels aren't reached. 6. The contingency plan will not include the acceptance and storage of unauthorised wastes. Pre-acceptance, waste acceptance & rejection procedures are implemented at the site to prevent the acceptance and storage of unauthorised wastes.

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	7. Management plans and continency procedures will: • Identify technology and any malfunction and maintenance procedures • Include a record of spare parts • Define procedures to identify, review and prioritise items of plant which need a preventative regime. • Include all equipment or plant whose failure could directly or indirectly affect the environment or human health • make sure the operator has the spare parts, tools, and competent staff needed before you start maintenance 8. It is not anticipated that the site will be producing an end of waste material. In the event that they do, the operator will consider issues with storage capacity and materials that fail the end-of-waste specification as part of contingency procedures. 9. Performance against the contingency measures will be reviewed and audited on an annual basis in line with a review of the management system, results will be reported to site management.
2.5 – Plant decommissioning	1. The site has been designed to consider the future decommissioning of the facility. 2. N/A – this only applies to existing facilities. 3. A Site Condition Report (SCR) has been produced as part of the permit application which provides information of the current condition of the land at permit issue, providing a baseline for any future decommissioning and potential permit surrender to ensure that the site will be returned to a satisfactory condition. 4. Upon decommissioning, the operator would identify non-productive or redundant items and implemented a programme of decommissioning and removal.

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	5. The site has been designed to ensure that there is no significant pollution pathway to ground, water or air as a result of the onsite operations, sufficient control measures have been considered and will be implemented to reduce any potential environmental impacts. Throughout the lifetime of the operation the SCR will be reviewed and updated in line with any operational or infrastructure changes.
3 – Waste pre-acceptance, acceptance and tracking	
3.1 – Waste pre-acceptance	*Waste Pre-Acceptance and Characterisation for Routine Loads* 1. All available information in respect of each waste stream including any chemical analysis (as applicable) will be reviewed in order to verify that waste is coded correctly as part of pre-acceptance procedures. Waste assessment comprising stringent pre-acceptance checks will be carried out on all routine loads upon collection and prior to them entering the site. This will include, but is not limited to, visual and olfactory checks of the load for any signs of contamination and/or non-conforming materials. If during the inspection there is evidence of visual or olfactory contamination that renders the load unsuitable for processing, the material may be rejected. The customer may also be informed to dispose/recover the material at an alternative suitably licensed facility. Prior to acceptance, all loads will be reviewed and booked in on the electronic system or spreadsheet maintained by the Site Operator to ensure that the company has a general idea of the load composition and obtain details of the load i.e. physical properties and assigned European Waste Catalogue (EWC) code. Prior to receipt of waste at the site, the source of the waste will be required to provided, including the following: • the waste producer (i.e. site name address and contact details); • the source and nature of the waste, at the point of production; • a description of the waste including its physical form;

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	• the full characteristics of the waste including the variability and reactivity (if relevant); • a description of any odour potential; • the type of packaging and risks of contamination; • an estimate of the quantity; and, • the age of the waste. 2. The site does not typically receive waste on an ad hoc basis. *Waste Characterisation for Routine Loads* 3 & 6. The operator will undertake waste characterisation for all routine loads. An initial 12-month evaluation will be carried out to determine the composition of wastes. The characterisation will ensure sampling is undertaken in accordance with a testing regime. The characterisation period will include samples of the loads to ensure the acceptable receipt at the site. The proposed regime will involve testing (but not limited to) the following: • hazardous substances; • heavy metals and toxic elements; • TPH; • organic matter; • moisture content; • protein; • carbohydrates; • total solids; • volatile fatty acids; • ammonia; • pH and alkalinity; • nitrogen; and, • methane.

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	Limits will be set for each of the above parameters, in the event that any of the limits are exceeded during sampling and testing, the load will receive a negative result, and the load will be temporarily ceased and may be rejected. 4 & 5. The site will not be accepting household waste or non-household waste from other skip waste companies. 7. The site will be accepting hazardous waste, all incoming hazardous waste will be verified as detailed previous in this section, all hazardous waste will be accompanied with the required hazardous waste consignment note (HWCN). 8. All samples will be tested in a laboratory using suitably recognised test methods. Following the initial waste characterisation period, routine loads will be subject to testing on a quarterly basis. If results of testing are consistent for a period of 6 months, the site will reduce testing to every 6 months which will remain the testing regime going forward. In the unlikely event that material is tested with results showing levels above the set thresholds, the operator will revert to quarterly testing. All sampling will be carried out by MCERT accredited laboratories. 9. Wastes are pre-booked prior to acceptance into the site so the operator is able to obtain all information regarding the source and nature of the waste as detailed previously in this section, this ensures that the operator will only allow permitted waste into the site that is suitable for the treatment activities undertaken, loads will also be subject to further waste acceptance checks prior to acceptance into the site. 10. Pre-acceptance documentation will be retained for a period of 3 years following receipt of a load. The potential odours and emission risks will be reviewed and considered prior to acceptance to ensure that suitable handling and storage procedures are implemented at the site.

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	11. The operator will reassess the information required at pre-acceptance in the event of the following • if there are any changes to the waste, • process giving rise to the waste • waste received does not confirm to the pre-acceptance information All pre-acceptance checks are reviewed and reassessed on annual basis. 12. The operator will be predominantly accepting routine loads that are pre-booked. When setting up contracts with a new customer the operator will agree with the customer what parameters are checked at the acceptance stage i.e. visual, physical, chemical and odour based parameters, the customer will also be notified of the non-conformance and rejection procedures.
3.2 – Waste acceptance	*Waste Acceptance Procedures for Routine Loads* 1. Loads will be inspected upon entering the site using the same visual and olfactory checks as previously mentioned. All incoming vehicles upon arrival are required to report to the person in charge of waste acceptance at the site. The details of the load will be recorded, and the duty of care note/company documentation will be further checked by the operator to ensure that the load is acceptable at the site and matches the pre-acceptance information, this includes a visual check prior to the vehicle proceeding to the tipping area. Any deviation from the procedures or problems with any loads will result in tipping facilities being suspended for the offending company. Loads which are not acceptable within the above terms will be rejected. It can sometimes be difficult to inspect a load prior to tipping, so material will be inspected during unloading activities so that any non-conforming materials can be identified, removed and transferred into the rejected waste container and recorded on the rejected waste form. Evidence of all waste assessment (in line with WM3) will be

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	documented and be accompanied with the relevant duty of care note/company documentation. Any waste arising from the waste producer/contractor will be assessed and classified in accordance with the guidance set out in WM3. The operator will require confirmation of the WM3 assessment and be provided with the accompanying waste transfer note or Hazardous Waste Consignment Note (HWCN) describing the physical and chemical composition, hazard characteristics and handling precautions, compatibility issues and information to specify the original waste producer and process. 2. The characterisation period detailed in the section above will help the site identify the composition of waste to inform the risk basis for the waste acceptance criteria and ongoing receipt, this may consider the following: • the source and nature of waste; • hazardous properties within the waste; • potential risks associated with the waste i.e. odour and other relevant emissions; and, • knowledge of the waste producer and age of the waste. 4. As wastes are pre-booked into the facility, the operator will ensure that they have storage capacity to accept the wastes, if the site is at capacity which may lead to a permit breach, the operator can stop further loads from being accepted at the site. 5. All transfer documentation will be checked and validated during the waste acceptance stage. If any discrepancies are identified, the load will be rejected in accordance with the site rejection procedure discussed in 3.3 below. If there is visual or olfactory evidence that wastes have been mis-classified as non-hazardous or mis-coded by the waste producer, the waste will be quarantined in a sealed area pending further testing to ensure suitability with the treatment plant or removal from site to a suitably authorised facility for further recovery/disposal.

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	6 & 7. The sites rejection procedure and handling of non-conforming wastes has been detailed in 3.3 below. 8. The details of each load i.e. weight/quantities will be checked and recorded on arrival to ensure it matches the information specified on accompanying paperwork. The above will be recorded on the sites electronic database. 9. The staff member carrying out waste acceptance checks will be trained as part of introductory training to identify and manage non-conformances in loads received. 10. All waste being unloaded will be visually inspected so that any non-conforming items can be removed and quarantined. 11. Offloading and receptions areas benefit from impermeable surface and self-contained drainage to prevent any pollution liquids from escaping off site. All deliveries in bulk tankers will be accompanied by a "wash out" certificate, as applicable. If a load of incoming waste is found to have substance concentrations which do not cause the waste to be classified as hazardous under WM3 but nevertheless are sufficiently close to the limit values that waste may be classified as hazardous, to ensure the operator can process the load through the relevant part of the treatment plant. It is important to note that the treatment plant is designed to ensure all loads can be recirculated within the plant. Residual, cleaned effluent will be periodically tested to ensure that the limits within the relevant Trade Effluent Consent are being met. In the event that material is not suitable for recirculation through the plant/discharge to sewer, it will be tankered off site and disposed of at a suitably licensed facility. In the event that a negative test result is received for contracted waste, the frequency of testing will be increased to monthly for a period of 6 months until the load has consistent

Appropriate Measure	Site Assessment
	positive results. The details and results of all testing will be recorded on an electronic spreadsheet.
3.3 – Quarantine	*Rejection Procedure* A waste may be non-conforming and rejected from the site for any of the following reasons: • Delivery vehicle is unsuitable for site operations / conditions; • The waste types are not acceptable at the site under the Environmental Permit; • There is prohibited waste mixed within the load; • The load is not accompanied by the correct documentation; • The waste does not match the description on the accompanying documentation; and, or, • The waste is unsuitable for treatment. If waste is identified as being unacceptable upon collection, at the site entrance or at the point of offloading, the site manager will be contacted and a Waste Rejection Form issued. The driver of the load will be informed of the load's rejection, reason for the rejection and requested to leave the site. 1. Clearly labelled enclosed skips/containers will be provided for the deposit of rejected waste which cannot be removed from the site immediately. The location may be varied as operating conditions permit (i.e. to permit the loading of rejected wastes) but clear labelling and management control will ensure its use as specified. If arrangements for the customer to remove the waste cannot be made, the Operator will make these arrangements. Waste materials in the quarantine area will be exported off site by a suitably licenced waste carrier to an appropriately permitted facility.

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	2. Where there is a risk of fugitive emissions from quarantined waste, enclosed containers will be used. 3. The site has a designated quarantine area which is separate from other waste storage areas, this is illustrated on the Site Layout Plan. 4. See 2 above. 5.The operator has written procedures within the EMS and FPP for dealing with waste held in quarantine, including maximum storage volumes. Storage times for the quarantined waste will take into account the potential for odour release and pest generation, if it is identified that the wastes is infested or odorous, it would be removed from site within 24 hours.
3.4 – Waste tracking	*Waste auditing and tracking* 1. An electronic waste tracking system will be implemented on site which holds all information obtained during pre-acceptance, storage and treatment of loads. The site will retain a catalogue of waste streams accepted at the site in line with those listed in the EP, this will ensure that all waste streams are characterised and can be subject to the periodic testing regime. The details and results of all loads accepted into the site along with testing will be recorded on an electronic spreadsheet. The tracking system will be cable of reporting the following: • quantity of waste present on site at any one time; • quantities of any waste pending on-site treatment or offsite removal; • breakdown of hazardous and non-hazardous waste quantities • where all waste is stored on site; and,

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	• the time and date of waste acceptance to ensure it remains with the permitted time limits. 2. As previously stated, records will be computerised and record on an electronic spreadsheet and kept up to date, the tracking system includes the following: • date and time of waste arrival; • details of the producer; • details of the previous holder (if applicable); • a unique reference number; • results of and pre-acceptance and waste acceptance analysis; • nature and quantity of waste; • intended disposal or recovery route; • waste storage location at the site; • where the waste is in the designated waste treatment route (for batch treatment); and, • decisions relating to pre-acceptance, waste acceptance, storage, treatment or rejection of waste. 3. The electronic system will be able to report for each LoW code: • the total quantity of waste present on site at any one time • a breakdown of the waste quantities you are storing pending on-site treatment or awaiting onward transfer • where a batch of waste is located based on a site plan • the quantity of waste on site compared with the limits in your management system and permit • the length of time the waste has been on site compared with the limits in your management system and permit 4. The electronic system will be able to report the quantity of waste materials on site at any one time and identify where the material is stored based on the Site Layout Plan.

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	5. The operator will store back-up copies of records off site which are accessible in an emergency. 6. The operator will hold acceptance records for a minimum of 2 years after they have treated the waste or removed it off site. It is important to note, that it is not feasible to audit each load accepted at the site, all routine loads will be audited and subject to the testing detailed previously, the loads will be subject to the visual and olfactory inspections prior to acceptance, the material will then be subject to quarterly sampling and testing as part of the ongoing testing regime detailed above. The above auditing and tracking of wastes ensure that sufficient knowledge is available with regards to what wastes have entered the site and are stored in a particular tank or treatment plant.
4 – Waste storage	
4.0 – General	1. The site will implement waste storage and handling procedures to prevent and minimise pollution risks. 2. It will be ensured that non-compatible wastes will not be stored/treated together as the system will be flushed through between treatment campaigns. Hazardous and non-hazardous wastes will be stored and treated separately. The operator will remain continual records and site inventory, ensuring that the types and quantities of wastes which are on-site and their location within the process are always known, including any hazards they pose. 3. Wastes will only be handled and transferred by members of staff who are suitably trained and/or qualified. Appropriate training will be provided to all members of staff responsible for handling and transfer of wastes.

Appropriate Measure	Site Assessment
	4. The site has been designed to ensure that all storage areas are located within buildings that face internally towards to the centre of the yard and away from sensitive receptors. The site is operational 24 hours a day Mon-Sat and benefits from CCTV, security gates and concrete walls to prevent unauthorised access and vandalism. 5. The EMS and FPP detail the maximum storage capacity for each storage area, the FPP only provides the above for combustible wastes, the EMS details the storage capacity for each storage area. 6. Waste storage areas will be clearly identified on the site, building 3 will be labelled with a hazardous and non-hazardous storage area enabling all operational staff to store waste in the relevant area. Liquid wastes will be loaded directly into the treatment process within building 2. 7. The incoming wet waste comprising sludges and jetting wastes etc. will be loaded into the wet waste treatment plant to ensure they are processed as soon as possible. The material will be stored in the designated external tanks/vessels prior to being subject to the treatment process within building 1. An EMS will in place at the site and detail maximum storage capacities and the operational site layout detailing designated storage areas to ensure that waste streams are not mixed. 8. As liquid based wastes are transferred directly into a single reception area, it ensures that a first-in-first-out principle is in place. With regards to the repackaging activity, a single storage area will be in place for non-hazardous materials, this will be an area that is utilised to bulk up material and once full, the area will be cleared in full ensuring that a first-in-first-out principle is in place. 9 & 10. N/A

Appropriate Measure	Site Assessment
	11. As part of general housekeeping and site inspections, all storage areas will be inspected for the presence of odour and vermin. With regards to odour, Buildings 1 and 2 will include an extraction system, which will extract air, via a series of activated carbon filters for emissions control, with air exhausted via an external elevated flue for dilution and dispersion of residual emissions. 12 & 13. Reception of wastes will be carried out within a building. Tanks will be stored adjacent to the site boundary within a suitably bunded area which accords with the relevant CIRIA 736 guidance. The location of all storage areas has been chosen to ensure they are located away from any watercourses or other sensitive receptors. Any containers or vessels/tanks which are used to store material will be subject to daily inspections to ensure they are in sound condition. Any defects will be investigated and rectified as soon as practicably possible dependent on the availability of a suitably licensed contractor. The extraction system has been designed to extract from a negative pressure environment. The site proposes to install the Nodour Hi-Flo 'twin bed' activated carbon system which is utilised in combination with an extraction fan and integral particulate pre-filter bed to protect carbon media. The extracted air will be collected via a duct system and routed to the main feed stock area and passes through a carbon adsorption unit prior to being discharged via the proposed stack. With regards to pests and vermin, a recognised pest control contractor will be brought in within 48 hours if any problems are encountered.
4.1 – Segregation	1. Different types of waste will always be segregated. 2. N/A – these waste types are not collected separately.
5 – Waste treatment	
5.0 – General	Wastes to be received for treatment will predominantly include water based liquid wastes. Solids will be removed and separated at various stages of the process. Waste is treated through the wet waste treatment plant; the plant has been purpose built to enable the efficient processing of waste for recovery and minimise the amount of waste to be

Appropriate Measure	Site Assessment
	disposed of. Pre-acceptance and Waste acceptance procedures will be implemented at the site to ensure that no unsuitable or unwanted waste is introduced to the treatment process. The treatment activities and associated abatement i.e. LEV system are detailed within the application documents, in summary, Buildings 1 and 2 will include an extraction system, which will extract air, via a series of activated carbon filters for emissions control, with air exhausted via an external elevated flue for dilution and dispersion of residual emissions. A full site layout plan and process flow of the site operations and associated treatment activities are shown in Appendix I.
5.1 – Soils and inert waste	1. N/A – soil and aggregates washing activities are not undertaken at the site.
5.2 – Waste treatment outputs, including fines	1. Waste treatment outputs will be classified in line with WM3. 2. Any hazardous wastes removed from the facility will be consigned in accordance with the following guidance "Disposal of hazardous waste". 3. Measures will be implemented to prevent and minimise risks of pollution from any non-waste and waste materials.
5.3 – Waste treatment for landfill	1. N/A – waste is not being handled or treated for landfill.
6 – Emissions control	
6.1 – Enclosure within buildings	1 - 3. Due to the nature of operations undertaken at the site, the treatment will be located within enclosed buildings (Building 1 & 2) which will include an extraction system, which will extract air, via a series of activated carbon filters for emissions control, with air exhausted via an external elevated flue for dilution and dispersion of residual emissions. The above ensures that the buildings are operated under negative pressure. 4. Material will be transferred from building 2 to external tanks prior to entering building 1, all systems used to transfer the waste will be enclosed.

Appropriate Measure	Site Assessment
	5 & 8. The operator will carry out daily site inspections which includes a check of buildings and external tanks. Any issues identified during inspections will be actioned for repair immediately, repair timescales will be dependent on the availability of suitably licensed contractors. 6. See response to point 1 above. 7. The buildings will be operated under negative pressure and reduce potential noise, dust and odour that could be emitted from the site. 9. See response to point 1 and 7 above. Extraction system in place at the site and the building will therefore be operated under negative pressure. 10. Buildings have been designed and constructed to reduce emissions of noise and vibration. A Noise Impact Assessment has been prepared for the facility.
6.2 – Point source emissions to air (channelled emissions)	1. Building 1 & 2 will include an extraction system, which will extract air, via a series of activated carbon filters for emissions control, with air exhausted via an external elevated flue for dilution and dispersion of residual emissions. This building will be operated under negative pressure and reduce potential noise, dust and odour that could be emitted from the site. Waste gases arising from the treatment processes and storage areas within Buildings 1 and 2 will be abated using a dust filter and activated carbon medium. The integrity of the building and abatement systems will be monitored as part of the site daily inspections, housekeeping schedule or maintenance schedule. With regards to point source emissions to air, an Emissions Modelling Assessment has been produced of the potential air quality impacts to accompany the application, it has been concluded that "No significant impacts are predicted on long term and short term Air Quality Limit Values (AQLVs)/Environmental Assessment Levels (EALs) at any receptor

Appropriate Measure	Site Assessment
	locations and no exceedances of relevant AQLVs and EALs are predicted at any relevant locations of exposure. 2. The operator has assessed the fate and impact of substances emitter to air in accordance with the Environment Agency's risk assessment guidance, as stated above an Emissions Modelling Assessment has been produced of the potential air quality impacts to accompany the application. 3. The operator will implement several abatement techniques which have been discussed above, this includes dust filters and activated carbon. 4. Vent and stack locations have been assessed and designed accordingly as detailed within the Emissions Modelling Assessment. 5. Suitable monitoring points will be installed which meet the sampling standard for the relevant pollutants. 6. All infrastructure and abatement will be monitored as part of daily inspections and maintained in accordance with the manufacturer requirements. 7. See above. In the event that any issues are identified when inspecting and monitoring the effectiveness of the abatement, the operator will initiate repair works to be carried out. 8. The site will implement contingency measures for plant failure or temporary shutdowns, these are detailed within the sites EMS. 9. Abatement has been designed to minimise water vapour plumes.
6.3 – Fugitive emissions to air	1. The site will use appropriate measures to prevent fugitive emissions to air including dust, mud, litter, odour and noise.

Appropriate Measure	Site Assessment
	A Noise Impact Assessment and Noise & Vibration Management Plan have been produced to accompany the application to demonstrate that the buildings are of a suitable construction to reduce emissions of noise and vibration. An Odour Management Plan (OMP) has been produced as part of the application to ensure that all potential odour sources are identified and controlled. The OMP has been produced in accordance with the H4 Odour Management guidance, this includes routine dynamic olfactory monitoring and sniff testing: Whilst dust, mud and litter are not considered to present a problem at the facility, the EMS details control measures with relation to these emissions. 2. The site implements pre-acceptance and waste acceptance checks to ensure the acceptance of compliant waste streams. These have been detailed in Section 3 of this table. The operator has enclosed the treatment process situated within Building 1. Building 2 and 3 enable access at the front to allow for the unloading of material into the relevant storage areas. Building 1 & 2 will be operator under negative pressure and benefit from an LEV abatement system. All material stored within building 3 will be situated within sealed containers, bins, drums and Intermediate Bulk Containers (IBCs). The plant has been designed to transfer material from Building 2 to Building 1 via enclosed pipework to prevent any release of fugitive emissions. The above procedures will prevent fugitive emissions to air. 3. All plant and equipment are subject to manufacturer maintenance timeframes; the operator will maintain records of all maintenance requirements. The site will be inspected

Appropriate Measure	Site Assessment
	daily paying attention to the operation of plant & equipment, abatement systems, drainage, containment, pipework, building integrity etc. to identify any issues that may result in the release of fugitive emissions. Drums and vessels will be constructed of suitable materials for the proposed contents, to prevent risk of corrosion or tank failure. 4. The site will monitor and log weather conditions as part of daily site inspections. 5. N/A – waste operations and storage are situated within buildings. 6. Activities undertaken at the site are not considered to produce dust & particulates, mud or litter that could cause pollution at sensitive receptors. Whilst the above aren't likely to present a problem at the site, the EMS outlines control measures with regards to each of these aspects. 7. It is not considered necessary to install litter fencing and micro-netting due to the nature of waste accepted at the site and the way they are handled and stored, all waste storage areas are situated within a building. 8. Due to the nature of wastes accepted at the site dust is not considered to be generated as a result of onsite activities, therefore no mist sprays are required to be installed at the site. The site will use hosepipes and brushes to regularly maintain site surfacing and ensure that mud is not tracked offsite onto the public highway, in the event that mud is identified off site a road sweeper will be hired in to clear up the site surfacing and surrounding highways. 9 - 11. The site benefits from a site-specific Odour Management Plan to prevent and minimise potential odorous emissions from the facility.

Appropriate Measure	Site Assessment
	Routine dynamic olfactory monitoring • The Odour Control Unit (OCU) has been designed to efficiently destruct potential odourous compounds. There are no BAT based odour emission limits for the treatment of water based liquid wastes. However, the EU BAT Conclusions Document for Waste Treatment contains a BAT based odour limit for treatment of biological waste, of between 200 and 1,000 Odour Units (OU).m^{-3}. It is anticipated that the upper end of this range will be achieved as a worst case residual odour concentration from the OCU. • Sampling using dynamic olfactometry according to EN 13725 will be undertaken every 3 months to establish residual odour concentrations arising from the stack serving the OCU and include assessment against the above criteria. Should all monitored odour concentrations be below 1,000OU.m^{-3} during the first 12 months of operations, monitoring would then be reduced to a period frequency of every 6 months. • Stack sampling will be undertaken to collect an air sample, in accordance with the EA Stack Emissions Monitoring Method Implementation Document for EN 13725. The stack has a sample port which has been designed in accordance with EA M1 Guidance. During each periodic test, bag samples of air will be collected from the stack and this subsequently exported from site for assessment of odour concentration in accordance with EN13725 and associated EA guidance. Stack sampling and post sampling assessment will be undertaken by a suitably accredited contractor. • In the event that the residual Odour Concentration exceeds 1,000 OU.m^{-3} from a routine periodic test, the operator will undertake immediate investigative action to identify the fault, take remedial action as necessary and then commission a further test to verify that the fault has been rectified. • Records of all sampling and any remedial action taken will be logged in the Site Diary and be available for inspection by the EA *Olfactory monitoring at site boundary (Sniff testing)*

Appropriate Measure	Site Assessment
	• In addition to the routine dynamic olfactory monitoring, odour will be monitored using sniff testing at the site boundary on a daily frequency and if there is a spillage of potentially odorous material, if an odour is detected on-site or in the event of odour complaint arising. During monitoring, the site supervisor, or designated, trained staff member, will monitor odour around the entire site perimeter and an Odour Diary will be completed. • The results of monitoring exercises and any remedial action taken will be entered into the log book which will be available for the EA to inspect upon request. The name of the site supervisor/odour assessor will be stated in the site's diary along with notes on weather including precipitation, temperature, wind speed and direction (from Met Office information). • Should the monitoring conclude that a certain activity/waste is giving rise to odour which is migrating offsite, steps will be taken to reduce the impact of this activity, which may include, but is not limited to; removal offsite to a suitably licensed facility, faster processing/lower storage rates, pumping and removal of standing surface water etc. • The site supervisor/odour assessor will be suitably trained to carry out these duties. • Prior to carrying out a routine odour check, the relevant member of staff will vacate the site for a period of 30 minutes and then carry out the assessment on their return to ensure they are not desensitised to the odour 12, The site will use water to wash out tankers and remove any residues, this will be undertaken within the reception pit located in building 2 and ensures that the water used for washing is directed back into the treatment plant. 13. The site will not allow contaminated liquids to pool at the site, all liquids wastes are discharged into the reception pit and stored in tanks. 14. Any potentially odorous liquids will be stored within enclosed tanks. 15. N/A - Any potentially odorous liquids will be stored within enclosed tanks.

Appropriate Measure	Site Assessment
	16 - 18. A Noise Impact Assessment in accordance with BS 4142:2014+A1:2019 and Noise & Vibration Management Plan have been produced to accompany the application to demonstrate that the buildings are of a suitable construction to reduce emissions of noise and vibration.
6.4 – Point source emissions to water (including sewer)	1 - 3. The operator will identify the main constituents at the point source emission to sewer from the treated water tank. A H1 sewer assessment has been produced as part of the application following the Environment Agency's risk assessment guidance. A trade effluent consent issued by Southern Water is in place at the site to control discharges to sewer. In addition, water is treated as part of the treatment process and will be recirculated through the plant, only once the water is not suitable for reuse after treatment will it be discharged to sewer under the aforementioned trade effluent agreement. 4. Water subject to discharge will have been subject to physico-chemical and biological treatment via the wet waste treatment plant to reduce potential emissions to sewer. A process flow diagram detailing a full breakdown of treatment activities is illustrated on Drawing No. 2499-06 which accompanies the application. 5. N/A – uncontaminated water will be segregated from those requiring treatment, no waste is stored externally and therefore surface water will only comprise clean runoff from roofs. 6. N/A - See above
6.5 – Fugitive emissions to land and water	1. The site will implement appropriate measures to control potential fugitive emissions and ensuring that they do not cause pollution. 2. The site comprises an impermeable concrete surface with suitable drainage that benefits from a penstock valve that can be shut-off to provide containment.

Appropriate Measure	Site Assessment
	3 – 6. The wider site is required to provide secondary containment which considers the industry standards detailed in CIRIA guidance C736 – Containment system for the prevention of pollution. The site will benefit from the construction of a concrete wall and/or kerbing around the perimeter of the site with a ramp at the site entrance to the yard which will create a sitewide containment area as detailed on the Site Layout Plan. The drainage system benefits from a penstock (shut off) valve which will be initiated during a fire event or tank failure to ensure the external yard is sealed. Buildings 1 & 2 are separately bunded to ensure that firewater does not enter the buildings during a fire event. Surface water and process water are kept separate at the site, no waste is stored externally at the site and surface water will only comprise clean rainwater, water within the wet waste treatment plant will be treated and either recirculated back into the process or discharge to sewer under a Trade Effluent Consent and in accordance with approved limits within the EP (which are still subject to assessment). See Point 1 in Section 6.4 above, a H1 sewer assessment has been produced as part of the application in accordance with the Environment Agency's risk assessment guidance. 7. The site will minimise the use of subsurface equipment and infrastructure, the operator will be utilising above ground storage tanks for liquid and sludge wastes. 8. See response to 3 – 6 above. 9. Oils stored at the site, including those arising from the wet waste treatment process will be stored within suitable containers within a building, oil storage will comply with the Oil storage regulations for businesses. 10. The site has external tanks which are used to store treated water prior to recirculation or discharge, if required these tanks can be used as buffer storage in the event of abnormal operation scenarios and incidents, however it is extremely unlikely that this

Appropriate Measure	Site Assessment
	scenario will occur at the site as waste are pre-booked into the facility to ensure that there is always capacity for waste entering the facility. 11. The site will use water to wash out tankers, this will be undertaken within the reception pit located in building 2 and ensures that the water used for washing is directed back into the treatment plant. 12 - 14. A spillage procedure is implemented at the site and suitable spills kits, booms etc.. are available at the site to manage any potential spillage. All staff will be trained on the spillage procedure in line with the manufacturer's health and safety advice as part of the introductory training. 15. The spillage procedure is in place to prevent any potential spillage from entering onsite drains or nearby watercourses. Suitable spills kits, booms etc.. are available at the site. 16. The spillage procedure will include information on the handling and disposal of waste produced from a spillage. 17. The site will have a documented inspection and maintenance programme for impermeable surfacing, containment and infrastructure. The operator will maintain records to demonstrate the implementation of any maintenance.
6.6 – Pests	N/A – loads are deposited directly into the treatment plant at which point they will be contained. Loads relating the repackaging activity will be stored within sealed containers, bins, drums and Intermediate Bulk Containers (IBCs) which provide adequate containment and will therefore prevent pest generation and infestation.
7 – Emissions monitoring and limits	

Appropriate Measure	Site Assessment
7.1 – Emissions to air	1. As detailed in the previous section, an Emissions Modelling Assessment has been submitted with the permit application. This assessment includes information of point source emissions to air. It has been concluded that "No significant impacts are predicted on long term and short term AQLVs/EALS at any receptor locations and no exceedances of relevant AQLVs and EALs are predicted at any relevant locations of exposure. 2. Fugitive emissions are not considered to be generated as a result of onsite activities, the site is not required to implement and Dust & Emissions Management Plan as part of the application. 3. Emission limits will be set as part of the permit determination and in accordance with BAT.
7.2 – Medium combustion plant directive	N/A
7.3 – Emissions to water and sewer	Monitoring of water-based wastes will be undertaken at various points through the process. This will be undertaken at the point of discharge to sewer, to demonstrate compliance with limits within the Trade Effluent Consent, but also at other points within the process. As detailed in 6.4, a H1 sewer risk assessment has been produced as part of the application following the Environment Agency's risk assessment guidance. A trade effluent consent issued by Southern Water is in place at the site to control discharges to sewer. 1. The H1 Risk Assessment for discharge to sewer has considered all compounds which the operator anticipates may be discharged. The concentrations assigned in the H1 Risk Assessment are based on BAT based limits and/or design criteria advised by the operator for the system 2. The operator will monitor key process parameters at key locations throughout the treatment process; this includes sampling the water at the final treatment stage prior to discharge.
8 – Process efficiency appropriate measures	

Appropriate Measure	Site Assessment
8.1 – Energy efficiency	1. An Energy efficiency plan will be implemented in accordance with BAT 23. 2. Energy efficiency and use will be monitored regularly, and the operator will review and record measures for improving energy efficiency on an annual basis and take any action deemed necessary by the review. A breakdown of energy consumption by type of source will be included as part of the review. 3 - 5. All mobile and stationary plant and equipment utilised at the site will be subject to regular maintenance to optimise operating efficiency. A record of fuel consumption will be maintained and will be used to identify any abnormal fuel consumption that requires investigation. All staff will receive appropriate training for operations at the site, which will include maintenance procedures and basic housekeeping (e.g. switching lights and equipment off when not in use). Low energy lighting systems will be used within the building. The operator will regularly review and update energy balance as part of the facility's management systems. 6. The site will implement techniques to avoid gross energy inefficiencies i.e. containment methods for buildings. 7. The operator will implement energy efficiency measures in accordance with the following guidance "Energy efficiency standards for industrial plants to get environmental permits" – published February 2016, Updated July 2019.
8.2 – Raw materials	1. The operator will keep a list of raw materials used at the site. 2. The operator has reviewed the availability of alternative raw materials and will continue to review these throughout the lifetime of the operation. 3. The operator has reviewed the availability of alternative raw materials and will be using the most suitable option.

Appropriate Measure	Site Assessment
	4. To ensure the appropriate use of raw materials and prevent release of any substances, Elliot Environmental Drainage Limited will follow quality assurance procedures when procuring materials and use specialist suppliers. When selecting raw materials priority will always be given to those with the least environmental impacts compared to any alternatives (where practical). There are several secondary raw materials utilised as part of the treatment process. The consumption of secondary raw materials will be monitored. Chemicals and polymers will be utilised as part of the water treatment process and will be stored in designated storage areas in suitable cabinets. Where relevant, all substances are assessed for COSHH (Control of Substances Hazardous to Health) compliance, the site will retain Material Safety Data Sheets (MSDS) for all materials handled and stored on site. Whilst the release of any substances is considered negligible, it is important to note that the facility will benefit from containment in line with CIRIA C736 which controls and prevents the release of any substances. A full list of the raw materials required to operate the permitted activities are detailed in the accompanying application documents.
8.3 – Water use	1. The operator will optimise water use to reduce the volume of waste water generated. Water is required for the operation of the wet waste treatment plant. 2. As part of the treatment process, water will be treated to enable recirculation within the plant, only once the water is not suitable for recirculation will it be discharged to sewer under a trade effluent agreement. The above ensures that water consumption is minimised by treating and recirculating water.

Appropriate Measure	Site Assessment
	3. The operator will review water use at least every 4 years. 4. The operator has produced flow diagrams for the operation detailing the water use throughout the treatment plant. 5. As detailed above, the operator will be recirculation water within the treatment process to reduce emission to water. Only once the water is not suitable for reuse into the plant will it be discharged to sewer. 6. The site will establish water quality requirements associated with each activity and identify areas where water could be substituted, as detailed previously, the operator will be treating and recirculating water within the process to improve efficiency and minimise water consumption. 7. The operator will treat water as part of the process and keep it segregated within designated storage tanks prior to discharge or recirculation. 8. The operator will minimise water used for general housekeeping and cleaning. Due to the site surfacing and waste types accepted and stored at the site, the potential for cleaning and washing of plants, equipment and surfaces will be significantly reduced. The site will use water to wash out tankers, this will be undertaken within the reception pit located in building 2 and ensures that the water used for washing is directed back into the treatment plant. 9. The operator will record fresh water use and record it at each usage point within the process.
9 - Waste minimisation, recovery and disposal	
9.0 – General	1. The site implements a standalone RMP which has been produced to ensure the following: • generation of residues from waste treatment is minimised; • optimises the reuse, regeneration and recycling of residues;

Appropriate Measure	Site Assessment
	• waste and material not suitable for reuse, regeneration or recycling is adequately disposed of. 2. Where there is a requirement for disposal of waste, the operator will carry out an assessment to identify the best environmental option for disposal. The RMP will be reviewed in the event that treatment activities change or if the site utilises any new raw materials as part of the operation

2 Chemical Waste: Appropriate Measures

2.1 The following table demonstrates how the operator will comply with Appropriate Measures for Chemical Wastes.

Table 2 - Chemical Waste Assessment – Appropriate Measures

Appropriate Measure	Site Assessment
1 - When appropriate measures apply	
1.1 – Measures that apply to different facilities	The site is applying for a physico-chemical treatment activity, and this technical guidance will be applicable.
1.2 – Implementing appropriate measures at new facilities	The site will accept and treat chemical waste, it is therefore considered the appropriate measure guidance applies.
2- General Management appropriate measures	
2.1 – Management system	In accordance with Section 2.1 of the appropriate measures the site will operate in accordance with an EMS. The EMS covers all elements in relation to the site operations i.e. staffing roles & responsibilities, training, relevant legislation, guidance and appropriate measures, process descriptions & controls, maintenance programmes, emergency preparedness and contingency planning. Where required, the EMS references site-specific documents which provide more targeted details on the specific environmental control elements i.e. Odour, Fire, emissions control etc
2.2 – Staff competence	1. The EMS details the staffing structure at the site, the site ensures that adequate number of staff are present on site to enable the operation of the facility, all staff are subject to introductory training and refresher training, details of any relevant training, qualifications and experience will be maintained.

Appropriate Measure	Site Assessment
	The site will be operational Monday to Saturday, 24 hours a day. Outside of operational hours, the site will be monitored by an external monitoring company who have staff members contact details who they contact in the event of an emergency. Site Security infrastructure and monitoring are detailed within the EMS. 2. The design, installation and maintenance of infrastructure and plant will be carried out by a certified company. Maintenance will be carried out in accordance with manufacturer recommendations. 3. Appropriately qualified managers will be available at the site; in this instance this includes the operator who will be obtaining the relevant WAMITAB qualification to ensure that the site is operated in accordance with an EP and the relevant appropriate measures. The operator obtaining the required technical competence will ensure regular attendance at the site as they will be present on the site for most operational days. 4. N/A – the operator will not be accepting asbestos, contaminated rags, WEEE, batteries or contaminated wood. The site will benefit from TCM who holds the relevant WAMITAB qualification. 5. If required, any samples will be taken by trained site staff or the TCM. Operatives will be trained on visual waste acceptance checks to ensure that they can identify and manage any non-conformances in the load. 6. If required, any samples will be taken by trained site staff or the TCM. 7. Analysis is not likely to be required as the site predominantly accepts routine loads where the nature of waste is known. 8. All employees will be given induction training and subsequent regular training to identify those waste types which are permitted for acceptance at the site under the sites EP and those wastes which are not. This will include specific training to identify those

Appropriate Measure	Site Assessment
	common wastes which may be found following deposit and are not permitted at the site and will also include more obscure wastes and how to handle these wastes safely. All employees will be advised that they should refer any unrecognisable or unknown wastes to senior management, who should, in turn, follow procedures outlined in the EMS and/or contact the EA to agree a suitable method for removal. Training is provided to all site users who handle waste on site and those in charge of administration and reporting. In-depth training will also be provided to drivers responsible for collecting wastes from the site of production. Full waste acceptance procedures have been detailed in Section 3.
2.3 – Accident management plan (AMP) 2.4 – Accident prevention measures	1. They will operate in accordance with a site-specific AMP which provides details of how the site will manage any incidents or accidents at the site which could result in pollution. 2. Accident control measures are summarised below. Risk of fire will be controlled by the following measures: • Site to be securely fenced and monitored 24-hours per day to prevent unauthorised access. • Environmental Management System in place containing appropriate measures to reduce risk of fire during routine operation; and, • FPP to be implemented during operations. Risk of vandalism will be controlled by the following measures: • Site to be securely fenced and monitored 24-hours per day to prevent unauthorised access. Risk of equipment malfunction or breakdown will be controlled by the following measures: • Planning Preventative maintenance schedules to be in place for all plant and machinery to be used; and, • Plant and equipment inspected regularly to ensure in good working order.

Appropriate Measure	Site Assessment
	Risk of spillages of wastes/fuels will be controlled by the following measures; The site has procedures in place for fuel/oil storage on site are as follows: • The containers used for the storage of hazardous fluids will be surrounded by a bund capable of containing a minimum of 110% of the volume of fuel stored in the tank. • All pipework and associated infrastructure will be enclosed within the bund. • A lock will be fitted to the tank valve to prevent unauthorised operation. • Any storage of oil will comply with the Control of Pollution (Oil Storage) (England) Regulations 2001 SI No.2954 or any subsequent legislation. • All valves and gauges on the tank will be constructed to prevent damage caused by frost; and, • The tanks will be clearly marked showing their capacity and product contained. Risk of flooding /abnormal weather such as heavy rainfall will be controlled by the following measures: • Site has drainage system in place to manage clean and foul drainage. • Site is located within Flood Zone 1 and therefore at lowest risk of flooding; and, • In the event of heavy rainfall, fully treated water will not be discharged to the sewerage system to prevent surcharging of the foul sewer. Risk of containment failure will be controlled by the following measures: • The site has secondary containment which considers the industry standards detailed in CIRIA guidance C736 – Containment system for the prevention of pollution. The site will benefit from the construction of a concrete wall and/or kerbing around the perimeter of the site with a ramp at the site entrance to the yard which will create a sitewide containment area as detailed on the Site Layout Plan. 4. The operator will assess the risk of accidents and the consequences

Appropriate Measure	Site Assessment
	5. The AMP assess risk with regards to vandalism, arson, self-combustion, plant & equipment failure, reactions between waste, neighbouring activities, sparks from plant etc.. 6. The AMP has been produced to take into account the scale and nature of any hazard by the treatment plant and activities, risk to receptors and nature and complexity of the operational activities. 7. The AMP details staffing roles and responsibilities at the site. Site Management will be responsible and involved in managing accidents. Site management will be suitably trained in managing any accidents at the facility, they will also be responsible for implementing the AMP. 8. The site will appoint an employee who will act as an emergency co-ordinator and take leak responsibility for implementing the AMP, this will someone within Site Management. 9. The AMP will detail emergency procedures include liaison with emergency services and receptors during and after an incident. Accident Prevention Measures 1 & 2. All hazardous and non-hazardous waste steams will be kept segregated. Building 3 will benefit from a dedicated non-hazardous and hazardous storage area which is separated by a firewall. Hazardous and non-hazardous waste streams will be kept separate within the treatment plant and directed through treatment via their respective storage tanks. 3. The site will contain any emergency firefighting water, tank failures via the secondary containment, spillage will be dealt with in accordance with spillage procedure, this has been detailed in full in the EMS. All clean surface water is routed to a suitable drainage system. The AMP, FPP and Containment Report provide details of how the site will

Appropriate Measure	Site Assessment
	contain any process waters, firefighting water and spillages. The reception pit is located within a sealed area, and wastes will not be released until the tanker is in position next to the pit, within Building 2. Should waste be spilled outside the area of the pit, this will drain to a large Aco drain in front of the hydro tip (Highest risk area). This will capture liquid, which will run into a pump chamber (alarmed) which will also pump liquids back into hydro tip. 4. Due to the location of the facility, it is not considered that the facility would be impacted by tidal surges and/or storm water flows. The site is located within a Flood Zone 1 so is unlikely to be impacted by a flood, In the event that a flood occurs at the site, the operator will inspect and assess the integrity of any affected plant, equipment, buildings or containment features that have been in contact with floodwater or groundwater. 5. Water will only be discharged from the treatment plant once it has been treated and sampled to ensure that it meets the requirements of the Trade Effluent consent and agreed limits within the Permit. 6. The AMP and EMS outline the spillage procedure implemented at the site to minimise the risk of an accidental spill, the procedure is in place to ensure that no spill can enter watercourses, sewer or contaminate land. 7. The FPP details the procedures for containing firewater to prevent any release to land, water or sewer. The wider site is required to provide secondary containment which considers the industry standards detailed in CIRIA guidance C736 – Containment system for the prevention of pollution. The site will benefit from the construction of a concrete wall and/or kerbing around the perimeter of the site with a ramp at the site entrance to the yard which will create a sitewide containment area as detailed on the Site Layout Plan. The drainage system benefits from a penstock (shut off) valve which will be initiated during a fire event or tank failure to ensure the external yard is sealed. Buildings 1 & 2

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	are separately bunded to ensure that firewater does not enter the buildings during a fire event. 8. The external tanks benefit from vents to release emissions and prevent build up, tanks are equipped with level sensors to prevent overflows and benefit from safety vent to release pressure build up. 9 & 10. The site is operational 24 hours a day Mon-Sat and benefits from CCTV, security gates and concrete walls to prevent unauthorised access and vandalism. The above security measures ensure that damage to equipment, theft, fly-tipping and arson are prevented. 11. The site will be operated in accordance with an FPP that meets the 3 objectives of the fire prevention plan guidance. 12. As previously detailed, the site is operational 24 hours a day Mon-Sat and benefits from CCTV, security gates and concrete walls to prevent unauthorised access which ensure the risk of arson is significantly reduced. 13. The FPP details suitable procedures for the storage of certain types of hazardous waste. All hazardous combustible wastes are stored within containers, IBCs or drums within building 3, the building benefits from concrete firewalls. 14. Due to the location of the site within an industrial area, there will be several hydrants in proximity to the site, and these may be used as the main form of suppression. The site also benefits from an onsite hydrant as detailed on the Site Layout Plan which will be utilised during a potential fire event. 15. Flammable waste storage is situated within building 3 which is separate from any onsite drainage systems. Firewater containment measures have been detailed previously within this section and are discussed within the sites FPP.

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	16. Daily checks are undertaken for dust and fluff on plant/equipment before use of equipment at the start/end of each working day. 17. The requirements of the FPP will be communicated to the local FRS. 18. Due to the nature of wastes stored at the site and the handling procedures in place along with daily inspections and monitoring, no areas of the site are likely to create explosive atmospheres. 19. The operator will maintain plant control in an emergency using alarms and warnings for any tank level exceedance. Tanks are equipped with level sensor warnings to prevent overflows. 20. All equipment required in an emergency are made easy to access. As detailed within the EMS, all mobile and fixed plant on site including vehicles in the fleet are subject to annual manufacturer maintenance to ensure proper working order in the form of service contracts. Site management will undertake or delegate additional preventative maintenance checks on a more frequent basis i.e. daily, before, during and 1 hour at the end of each working day. The site will construct vehicle crash barriers (Armco, or similar) around building walls and bund walls used for the external tank containment to prevent any moving vehicles damaging buildings and plant or containment features. 21. The operator will maintain a record log of accidents, incidents, near misses, procedural changes, abnormal events and results of maintenance inspections (if an issue has been identified). Site management will investigate any incidents relating to the above and implements suitable measures to avoid reoccurrence.

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	An inventory of substances that could have environmental consequences will be maintained, any substances which may result in environmental consequences will be suitably stored in accordance with recommended storage methods. Any chemicals used in the process will be stored within appropriately bunded areas/suitable cabinets. Hazardous liquid wastes will also be stored in appropriately bunded areas on-site and within designated storage area. As such, there are sufficient pollution prevention measures in place, such that the risk to soil and ground water is considered negligible as there is not considered to be any significant pathway between source and receptor.
2.5 – Contingency plan and procedures	1. The site will implement contingency procedures to ensure that the operation will comply with all permit requirements. These contingency procedures cover how the site will handle and deal with emergency situations, fire, spillages, breakdowns & operational failure, staff shortages, adverse reactions, adverse weather conditions etc. In addition to the above, site-specific management plans will be implemented at the site which cover contingency measures relating to a specific environmental issue such as odour & fire. 2. The EMS outlines contingency procedures relating to planned shutdowns at any waste management facilities which waste is sent. 3. Any routine contracts will be made aware of contingency procedures to prevent further acceptance of waste during any incidents. 4. The site does not rely on regular sites or companies to take the waste. 5. The site will implement contingency procedures within the EMS for the diversion of waste to suitable alternative facilities in the event that permitted limits are exceed or storage procedures are compromised. The site accepts pre-booked waste which enables them to control the levels of waste accepted at the facility and ensure that permitted levels aren't reached.

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	6. The contingency plan will not include the acceptance and storage of unauthorised wastes. 7. Management procedures and contingency procedures will: • identify known or predictable malfunctions associated with your technology and the procedures, spare parts, tools and expertise needed to deal with them • include a record of spare parts held, especially critical spares. • have a defined procedure to identify, review and prioritise items of plant which need a preventative maintenance regime • include all equipment or plant whose failure could directly or indirectly lead to an impact on the environment or human health • identify 'non-productive' or redundant items such as tanks, pipework, retaining walls, bunds, mobile plant, reusable waste containers (for example wheeled carts), ducts, filters and security systems • make sure you have the spare parts, tools, and competent staff needed before you start maintenance 8. It is not anticipated that the site will be producing an end of waste material. In the event that they do, the operator will consider issues with storage capacity and materials that fail the end-of-waste specification as part of contingency procedures 9. The EMS will include procedures for auditing performance against the facility's contingency measures. All results are reported to the operator.
2.6 – Plant decommissioning	1. The site has been designed to consider the future decommissioning of the facility. 2. N/A – this only applies to existing facilities. 3. A Site Condition Report (SCR) has been produced as part of the permit application which provides information of the current condition of the land at permit issue, providing a baseline for any future decommissioning and potential permit surrender to ensure that the

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	site will be returned to a satisfactory condition. Throughout the lifetime of the operation the SCR will be reviewed and updated in line with any operational or infrastructure changes. 4. The decommission plan will include details (but not be limited to) specified in these appropriate measures i.e removal and flushing of pipelines, dismantling of plant and associated infrastructure, measures proposed to avoid pollution risk and return the site to a satisfactory state and how any residues and wastes are cleared. 5. The site has been designed to ensure that there is no significant pollution pathway to ground, water or air as a result of the onsite operations, sufficient control measures have been considered and will be implemented to reduce any potential environmental impacts. All equipment decommissioned plant & equipment will be decontaminated and removed from the site.
3 – Waste pre-acceptance, acceptance and tracking	
3.1 – Waste pre-acceptance	*Waste Pre-Acceptance and Characterisation for Routine Loads* The operator will be predominantly accepting routine loads that are pre-booked. When setting up contracts with a new customer the operator will agree with the customer what parameters are checked at the acceptance stage i.e. visual, physical, chemical and odour based parameters, the customer will also be notified of the non-conformance and rejection procedures. 1 & 2. All available information in respect of each waste stream including any chemical analysis (as applicable) will be reviewed in order to verify that waste is coded correctly as part of pre-acceptance procedures. Waste assessment comprising stringent pre-acceptance checks will be carried out on all routine loads upon collection and prior to them entering the site. This will include, but is not limited to, visual and olfactory checks of the load for any signs of contamination

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	and/or non-conforming materials. If during the inspection there is evidence of visual or olfactory contamination that renders the load unsuitable for processing, the material may be rejected. The customer may also be informed to dispose/recover the material at an alternative suitably licensed facility. Prior to acceptance, all loads will be reviewed and booked in on the electronic system or spreadsheet maintained by the Site Operator to ensure that the company has a general idea of the load composition and obtain details of the load i.e. physical properties and assigned European Waste Catalogue (EWC) code. When a customer query is received prior to acceptance, the operator will obtain the following: • the waste producer (i.e. site name address and contact details); • the source and nature of the waste, at the point of production; • a description of the waste including its physical form; • the full characteristics of the waste including the variability and reactivity (if relevant); • a description of any odour potential; • the type of packaging and risks of contamination; • an estimate of the quantity; and, • the age of the waste. The characterisation period will include samples of the loads to ensure the acceptable receipt at the site. The proposed regime will involve testing (but not limited to) the following: • hazardous substances; • heavy metals and toxic elements; • TPH; • organic matter; • moisture content; • protein; • carbohydrates;

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	• total solids; • volatile fatty acids; • ammonia; • pH and alkalinity; • nitrogen; and, • methane. Wastes are pre-booked prior to acceptance into the site enabling the operator to obtain all information regarding the source and nature of the waste as detailed previously in this section, this ensures that the operator will only allow permitted waste into the site, loads will also be subject to further waste acceptance checks prior to acceptance into the site. 3. The site will consider any waste streams that have properties that can pose unacceptable risks to the site or process, waste streams accepted in the wet waste treatment plant are suitable for the proposed treatment process and are therefore unlikely to pose unacceptable risks. Any hazardous wastes within building 3 will be handled and stored in suitable containers. 4. The site has established a list of waste that they can verify the pre-acceptance information by contacting the producer. 5. Samples of waste will be obtained if the chemical composition or variability of the waste does not align with information supplied by the customer. 6. Representative samples will only be taken on required waste streams. 7. Once waste is fully characterised, the operator will assess the waste's suitability for treatment or storage and ensuring that they can meet the EP requirements and conditions.

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	8. The site will not use material flow analysis; material has been carefully reviewed and selected to ensure that they are suitable for the proposed treatment plant at the site. 9. Pre-acceptance documentation will be retained for a period of 3 years following receipt of a load. The potential odours and emission risks will be reviewed and considered prior to acceptance to ensure that suitable handling and storage procedures are implemented at the site. 10. The operator will reassess the information required at pre-acceptance in the event of the following • if there are any changes to the waste, • process giving rise to the waste • waste received does not confirm to the pre-acceptance information All pre-acceptance and waste acceptance checks are reviewed and assessed on annual basis. 11. Odour criteria will be applied to wastes accepted at the site which have the potential to release VOCs. 12. The roles and responsibilities of any administration/sales and technical staff will be separate. The final check will make sure that: • the site accepts wastes which are suitable, • the site avoids overaccumulation of material, • there is sufficient storage and treatment capacity. 13. The operator will undertake waste characterisation for all routine loads. An initial 12-month evaluation will be carried out to determine the composition of wastes. The characterisation will ensure sampling is undertaken in accordance with a testing regime.

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	Limits will be set for each of the above parameters, in the event that any of the limits are exceeded during sampling and testing, the load will receive a negative result, and the load will be temporarily ceased and may be rejected. 14. Characterisation of liquid-based wastes can include the following: • water content • composition (solids content and contaminants) • pH • density • test whether the stream might inhibit biological treatment 16. Characterisation of solid wastes can include the following: • water content • density • pH • check the content of volatile and semi volatile substances 17. N/A – immiscible phases or fractions are not present in the waste. 18. All samples will be tested in a laboratory using suitably recognised test methods. Following the initial waste characterisation period, routine loads will be subject to testing on a quarterly basis. If results of testing are consistent for a period of 6 months, the site will reduce testing to every 6 months which will remain the testing regime going forward. In the unlikely event that material is tested with results showing levels above the set thresholds, the operator will revert to quarterly testing. 19. When setting up contracts or accepting waste from a customer, the site will decide and record the parameters that will be assessed during the acceptance stage. These will include but are not limited to the following: • visual checks for colour.

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	• Physical checks for the waste form. • Chemical checks for pH. • Olfactory checks for odour. Tolerances will be defined for each and records will be maintained; it will also be identified which of the above criteria may lead to further testing and non-conformance/rejection. The person undertaking the checks may also decide on their own parameters where they deem it fit.
3.2 – Waste acceptance	1. Waste acceptance procedures will be undertaken to check that the characteristics of waste accepted at the site match pre-acceptance information and can be accepted into the facility. 2. Waste acceptance procedures follow a risk-based approach to consider the following: • source, nature and age of waste • the waste hazardous properties • potential risks to process safety, occupational safety and the environment i.e. diffuse emissions. • Knowledge of previous waste holder(s). 3. The site will pre-book all loads into the facility the have undergone pre-acceptance checks. 4. Pre-booking loads ensures that the site will have capacity to receive loads. The site will not exceed limits set under COMAH. 5. All loads accepted into the facility are subject to visual inspections to ensure they align with pre-acceptance information and transfer documentation prior to acceptance into the site.

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	6. All transfer documentation will be reviewed and validated prior to waste acceptance. Any inconsistencies will be addressed with the customer and may result in the load being rejected. All non-conformances and rejected loads will be recorded. 7. The site will have a rejection procedure which will be in place for non-conforming wastes. All non-conformances and rejected loads will be recorded. The procedure will include notifying the producer and the regulator. 8. All loads subject to the repackaging activity will be weighted on arrival, all liquid waste will arrive in tankers, and the weight/quantity will be determined by the size of the vehicle. The above will be checked against the accompanying paperwork and recorded on the database. 9. The person carrying out the waste acceptance procedures will be trained to effectively identify and manage non-conformances to ensure operational compliance with the EP, this will form part of the introductory training with refresher training undertaken. 10. N/A - Radioactive waste will not be accepted into the site. 1. The site will minimise the manual handling of waste and use mechanical unloading where it is safe to do so. Due to the nature of waste accepted at the site it is unlikely that manual handling of wastes will be carried out at the site. 12. All offloading, sampling, quarantine, storage and receptions areas are undertaken on an impermeable surface with contained drainage to prevent any spillages or storage systems escaping off site. 13. The site will have a designated sample point for any treated water prior to discharge; there will be a laboratory on site to carry out testing, the operator also uses an approved third-party supplier for testing where required.

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	14. Once checks have been carried out to ensure compliance with the EP, containerised liquid wastes subject to the wet waste treatment process will be discharged into a reception pit within building 2. 15. All waste containers used for storage at the site will be fit for purpose i.e. in sound condition, undamaged, not corroded, well-fitting sealed lids, suitable for the contents stored within in them and have valves and bungs in place and secure. All containers will be risk assessed to ensure they have not exceeded manufacturer's use by dates. Any non-conforming containers will be handled accordingly and removed off site to a suitable permitted facility. 16. Where appropriate, the site will sample and analyse the contents of containers within one working day of receipt. 17. The site will not store non-compliant containers at the site, any containers which have been previously used for storage and are no longer compliant or suitable will be quarantined prior to offsite removal. The waste will be transferred from these containers to a suitable alternative to ensure compliance is maintained. 18. The site benefits from a quarantine area, material stored in this area will be removed when full, it is worth noting that this will not exceed 5 working days. The rejection procedure and details of the quarantine area are detailed with the EMS and FPP. 19. N/A – the site will not be accepting laboratory smalls. 20. All containerised loads received at the site will be labelled to detail the waste description, chemical identity and composition, tracking reference, arrival date and a hazard code.

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	The tracking reference allows waste to be tracked throughout the process and enable to operator to easily identify the waste producer. 21. Any bulk loads of containers that may arrive on pallets will be labelled with the relevant information, if the bulk loads are split up, each individual containers will be labelled with the required information. 22. At present the site is not using a bar code system. If bar codes systems are used, the hazardous property and date of receipt will be visible. 23. Hazardous and non-hazardous waste streams will all be kept segregated at the site to minimise the risk of incompatible materials reacting together. 24. Bulk loads will only be offloaded at the site once they have been verified as complaint, verification includes checking consistency with pre-acceptance information and checking the treatability of the waste. As waste are pre-booked into the site, it is considered that once they have been verified to meet the pre-acceptance information they can be offloaded. 25. Tanker deliveries will be accompanied by a wash certificate. 26. Samples from tankers will (where possible) be taken from the top hatch, if a tanker is divided into multiple compartments, each compartment will be sampled. If samples are taken from the rear valve, suitable precautions are implemented to avoid any spillages. 27. Whilst routine loads and pre-booked wastes are checked against the pre-acceptance information, each routine load will not always be sampled each time they are accepted into the site, these loads will be to the pre-acceptance checks and visual inspections to ensure that there aren't any non-conforming materials within the load, these loads will still be subject to periodic sampling.

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	28. Any representative samples undertaken will take account of the full variation and any partitioning of the load. 29. Not all loads are sampled, see point 27 and full pre-acceptance and waste acceptance procedures discussed within this assessment and Environmental Management System (EMS) 30. Any onsite sampling of loads will be carried out by suitably trained staff or under the supervision of qualified staff. 31. Sampling will not increase the risk of incompatible substances coming into contact with one another. 32. A spillage procedure is implemented at the site and suitable spills kits, booms etc.. are available at the site to manage any potential spillage. 33. Any sampling will be documented in the computerised tracking system. 34. Acceptance samples will be kept on site for at least 2 working days after a waste has been treated and its residues removed from the facility or after waste has been transferred from the site. 35. The site will implement a sampling and analysis procedure based on risk factors for the waste, for example type of waste, waste producer information etc.. 36. Where applicable, physico-chemical parameters will be checked using the appropriate equipment. 37. Samples procedures will be customised for each type of loads accepted at the site i.e. liquids, solids, bulk loads etc..

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	38. The site will determine and record the sampling regime for each load, details of where and how samples were taken, capacity of the sample, number of samples and operating conditions during the time of the sample. 39. Any waste will be sampled in accordance with the following guidance: • EN 14899 Characterization of waste. Sampling of waste materials. Framework for the preparation and application of a sampling plan • CEN/TR 15310-1 Characterization of waste. Sampling of waste materials. Guidance on the selection and application of criteria for sampling under various conditions • CEN/TR 15310-2 Characterization of waste. Sampling of waste materials. Guidance on sampling techniques • CEN/TR 15310-3 Characterization of waste. Sampling of waste materials. Guidance on procedures for sub-sampling in the field • CEN/TR 15310-4 Characterization of waste. Sampling of waste materials. Guidance on procedures for sample packaging, storage, preservation, transport and delivery • CEN/TR 15310-5 Characterization of waste. Sampling of waste materials. Guidance on the process of defining the sampling plan 40. If testing is undertaken, it will be undertaken in accordance with parameters decided during pre-acceptance. Results will be recorded within the waste tracking system noting any discrepancies (where identified). 41. Analysis will be carried out on site using suitably recognised testing methods. There will be a laboratory on site to carry out testing, the operator also uses an approved third-party supplier for testing where required. *Waste Acceptance Procedures for Routine Loads* Full waste acceptance procedures are specified in the EMS and are detailed below: Loads will be inspected again upon entering the site using the same visual and olfactory checks as previously mentioned. All incoming vehicles upon arrival are required to report

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	to the person in charge of waste acceptance at the site. The details of the load will be recorded, and the duty of care note/company documentation will be further checked by the operator to ensure that the load is acceptable at the site, including a visual check prior to the vehicle proceeding to the tipping area. Any deviation from the procedures or problems with any loads will result in tipping facilities being suspended for the offending company. Loads which are not acceptable within the above terms will be rejected. It can sometimes be difficult to inspect a load prior to tipping, so material will be inspected during unloading activities so that any non-conforming materials can be identified, removed and transferred into the rejected waste container and recorded on the rejected waste form. Evidence of all waste assessment (in line with WM3) will be documented and be accompanied with the relevant duty of care note/company documentation. Any waste arising from the waste producer/contractor will be assessed and classified in accordance with the guidance set out in WM3. The operator will require confirmation of the WM3 assessment and be provided with the accompanying waste transfer note or Hazardous Waste Consignment Note (HWCN) describing the physical and chemical composition, hazard characteristics and handling precautions, compatibility issues and information to specify the original waste producer and process. The characterisation period detailed in the section above will help the site identify the composition of waste to inform the risk basis for the waste acceptance criteria and ongoing receipt, this may consider the following: • the source and nature of waste; • hazardous properties within the waste; • potential risks associated with the waste i.e. odour and other relevant emissions; and, • knowledge of the waste producer and age of the waste.

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	All deliveries in bulk tankers will be accompanied by a "wash out" certificate, as applicable. If there is visual or olfactory evidence that wastes have been mis-classified as non-hazardous or mis-coded by the waste producer, the waste will be quarantined in a sealed area pending further testing to ensure suitability with the treatment plant or removal from site to a suitably authorised facility for further recovery/disposal. Notwithstanding the above, if a load of incoming waste is found to have substance concentrations which do not cause the waste to be classified as hazardous under WM3 but nevertheless are sufficiently close to the limit values that waste may be classified as hazardous, to ensure the operator can process the load through the relevant part of the treatment plant. It is important to note that the treatment plant is designed to ensure all loads can be recirculated within the plant. Residual, cleaned effluent will be periodically tested to ensure that the limits within the relevant Trade Effluent Consent are being met. In the event that material is not suitable for recirculation through the plant/discharge to sewer, it will be tankered off site and disposed of at a suitably licensed facility. In the event that a negative test result is received for contracted waste, the frequency of testing will be increased to monthly for a period of 6 months until the load has consistent positive results. The details and results of all testing will be recorded on an electronic spreadsheet.
3.3 – Waste tracking	*Waste auditing and tracking* 1. A computerised waste tracking system will be implemented on site which holds information obtained during pre-acceptance, storage and treatment of loads.

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	2. The waste tracking system will hold information on pre-acceptance, waste acceptance, rejection, storage, treatment and removal offsite. 3. Records will be computerised and record on an electronic spreadsheet and kept up to date, the tracking system includes the following: • date and time of waste arrival; • details of the producer; • details of the previous holder (if applicable); • a unique reference number; • results of and pre-acceptance and waste acceptance analysis; • nature and quantity of waste; • intended disposal or recovery route; • waste storage location at the site; • where the waste is in the designated waste treatment route (for batch treatment); and, • decisions relating to pre-acceptance, waste acceptance, storage, treatment or rejection of waste. 4. The site will retain a catalogue of waste streams accepted at the site in line with those listed in the EP, this will ensure that all waste streams are characterised and can be subject to the periodic testing regime. The details and results of all loads accepted into the site along with testing will be recorded on an electronic spreadsheet. The tracking system will be cable of reporting the following: • quantity of waste present on site at any one time; • quantities of any waste pending on-site treatment or offsite removal; • breakdown of hazardous and non-hazardous waste quantities • where all waste is stored on site; and, • the time and date of waste acceptance to ensure it remains with the permitted time limits.

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	5. The operator will maintain back-up copies of computer records off site and ensure that they are accessible in an emergency. 6. All acceptance records will be held for a minimum of 2 years after waste has been treated or removed off site. Hazardous waste consignments notes will be held for 5 years. It is important to note, that it is not feasible to audit each load accepted at the site, all routine loads will be audited and subject to the testing detailed previously, the loads will be subject to the visual and olfactory inspections prior to acceptance, the material will then be subject to quarterly sampling and testing as part of the ongoing testing regime detailed above. The above auditing and tracking of wastes ensure that sufficient knowledge is available with regards to what wastes have entered the site and are stored in a particular tank or treatment plant.
4 – Waste storage, segregation and handling	
4.0 – General	1. The site will implement waste storage and handling procedures to prevent and minimise the handling of waste and pollution risks. 2. The site has been designed to ensure that all storage areas are located within buildings that face internally towards to the centre of the yard and away from sensitive receptors. The site is operational 24 hours a day Mon-Sat and benefits from CCTV, security gates and concrete walls to prevent unauthorised access and vandalism. 3. The site will confirm to the relevant HSE standards, some of the relevant standards are detailed below: • HSG51 Storage of flammable liquids in containers • HSG71 Chemical warehousing: storage of packaged dangerous substances • HSG76 Warehousing and storage: a guide to health and safety

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	• HSG140 Safe use and handling of flammable liquids 4. The EMS and FPP detail the maximum storage capacity for each storage area, the FPP only provides the above for combustible wastes, the EMS details the storage capacity for each storage area. 5. Waste storage areas will be clearly identified on the site, building 3 will be labelled with a hazardous and non-hazardous storage area enabling all operational staff to store waste in the relevant area. Liquid wastes will be loaded directly into the treatment process within building 2. 6. Storage area infrastructure ensures that any possible contaminated run-off is contained, prevents incompatible wastes from coming into contact with each over and ensures that any potential fire cannot spread. 7. Secondary containment will conform to CIRIA C736 guidance. 8. Any containerised wastes that are sensitive to air, light, heat, moisture or extreme ambient temperatures will be stored undercover protected from ambient conditions. 9. In the event of waste storage that have the potential for self-heating or self-reactivity, the waste will be stored in suitable sealed containers. 10. All wastes will be stored in tanks or undercover within buildings. 11. Hazardous waste will be stored in either tanks or in enclosed drums, containers, IBCs within Building 3. 12. The site will not store or hold wastes on site in vehicles.

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	13. The site will pay particular attention to avoid the build-up of static electricity when you are storing or handling flammable wastes and materials. 14. All storage areas on site are adequately bunded and the site benefits from secondary containment in accordance with CIRIA C736 to contain any potential water run-off. 15. The site will not accumulate waste, waste will predominantly arrive on site and be discharged into the reception pit within building 2 to ensure that it is processed as soon as possible. Any waste that arrives as part of the repackaging activity will be stored in the relevant hazardous or non-hazardous storage area which will be cleared within the timescales specified within the FPP or sooner if the area is full. In the unlikely event that waste needs to be stored for a longer period, the Environment Agency will be informed. 16. All containers, tanks, drums, IBCs will be labelled, if labels are damaged that will be replaced. 17. Waste will be handled and stored so that labels are easily visible. 18. Solid waste will be kept dry to avoid dilution, all wastes are stored within buildings or external tanks. 19. N/A – no cooling waters used as part of the process. 20. Incompatible waste will be segregated so that they cannot come into contact with one another. A FPP will be implemented at the site for the storage and handling of flammable wastes. 21. There will be pedestrian and vehicular access to storage areas so that containers can be retrieved and accessed. 22. All containers will be stored to allow for easy inspection and access.

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	23. Drums and containers will be stored within building 3 until either the residences times specified within the FPP are met or enough waste is bulked up to be removed from the site, whichever is sooner. 24. N/A – at present the site is not proposing to store bagged materials, any boxes will be stored no more than 1m high on a pallet. 25. At present, the site will not be seeking to stack containers. 26. At present the site will not be seeking to stack material on pallets, on occasion they may stack empty containers to enable more storage space. 27. At present the site will not be seeking to stack bags, boxes or containers. 28. All waste containers will be fit for purpose; the integrity of containers will be checked as part of daily site inspections. Any non-compliant containers identified will be replaced and removed from site, any poorly labelled containers will be provided with new labels to ensure the contents within them are always known. The operator will assess and record the use of containers to ensure they aren't used beyond their specified design life. 29. The site will not handle waste or its packaging in a way that might damage its integrity. 30. N/A – tanks unlikely to be containing organic liquid with a flashpoint less than 21°C. 31. N/A – no asbestos accepted. 32. N/A – no wheeled containers stacked at the site.

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	33. Any containers that need them will have a lid which will remain closed unless the contents require sampling or are having waste discharged into it or removed from it. 34. The site will not stack any skips containing hazardous wastes. Any hazardous material will be in enclosed containers. 35. N/A – the site will not be proposing to use a racking system. 36. No wash water will enter the surface water drainage system and surface sewer system. The surface sewer system will only handle clean roof water or treated water from the process which will be subject to sampling prior to discharge. 37. Waste will be managed and handled to prevent pest infestation, the nature of waste accepted at the facility are not likely to generate or attract pests or vermin. A recognised pest control contractor will be brought in within 48 hours if any problems are encountered. 38. Storage areas, containers and infrastructure will be inspected daily as part of the daily inspection checks, any issues identified will be rectified as soon as practicably possible dependent on the availability of suitably licensed contractors. 39. If the site handles palletised goods, drivers will be sufficiently trained to handle them. 40. The site will not be carrying out activities that represent a clear fire risk within any storage area. The site will operate in accordance with an FPP. The incoming wet waste comprising sludges and jetting wastes etc. will be loaded into the wet waste treatment plant where the material will subsequently be stored in the designated tanks or vessels prior to being subject to the treatment process. The reception of wastes will be carried out within buildings. Tanks will be stored adjacent to the site boundary within a suitably bunded area which accords with the relevant CIRIA

Appropriate Measure	Site Assessment
	736 guidance. The location of all storage areas has been chosen to ensure they are located away from any watercourses or other sensitive receptors. Any containers or vessels/tanks which are used to store material will be subject to daily inspections to ensure they are in sound condition. Any defects will be investigated and rectified as soon as practicably possible dependent on the availability of a suitably licensed contractor. An EMS will in place at the site and detail maximum storage capacities and the operational site layout detailing designated storage areas to ensure that waste streams are not mixed. As liquid based wastes are transferred directly into a single tank, it ensures that a first-in-first-out principle is in place. With regards to the repackaging activity, a single storage area will be in place for non-hazardous materials, this will be single area that is utilised to bulk up material and once full, the area will be cleared in full ensuring that a first-in-first-out principle is in place. As part of general housekeeping and site inspections, all storage areas will be inspected for the presence of odour and vermin. With regards to odour, Buildings 1 and 2 will include an extraction system, which will extract air, via a series of activated carbon filters for emissions control, with air exhausted via an external elevated flue for dilution and dispersion of residual emissions. The extraction system has been designed to extract from a negative pressure environment. The site proposes to install the Nodour Hi-Flo 'twin bed' activated carbon system which is utilised in combination with an extraction fan and integral particulate pre-filter bed to protect carbon media. The extracted air will be collected via a duct system and routed to the main feed stock area and passes through a carbon adsorption unit prior to being discharged via the proposed stack.
4.1 – Bulk Storage	41. The wider site is required to provide secondary containment which considers the industry standards detailed in CIRIA guidance C736 – Containment system for the

Appropriate Measure	Site Assessment
	prevention of pollution. The site will benefit from the construction of a concrete wall and/or kerbing around the perimeter of the site with a ramp at the site entrance to the yard which will create a sitewide containment area as detailed on the Site Layout Plan. The drainage system benefits from a penstock (shut off) valve which will be initiated during a fire event or tank failure to ensure the external yard is sealed. Buildings 1 & 2 are separately bunded to ensure that firewater does not enter the buildings during a fire event. 42. All tanks and associated equipment used at the site will be suitably designed, constructed and maintained in accordance with manufacturer requirements and recommendations. 43. Storage tanks will be vented 44. All storage vessels/tanks will be located on impermeable surfacing with secondary containment. 45. See point 41. 46. The site will control potential sludge build up and foam in tanks by regularly sucking out sludge and using anti foaming agents. 47. Storage and treatment tanks will be fitted with a level sensor to prevent overfill/overflow. 48. Connections to vessels, tanks and secondary containment will be able to be closed. 49. N/A – alarms on tanks to prevent overfilling and overflows, loads stored in tanks can be pumped into other tanks if required.

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	50. All tanks and associated fittings and pipework will be examined by a competent person. The scope and frequency of inspections will be determined by a competent person. 51. The operator have systems in place to make sure that loading, unloading and storage are safe. 52. Any containers storing hazardous or liquid wastes will not be open topped.
4.2 – Transfer of waste into and from tankers	53. Pipework and connections points will be fit for purpose and have been designed specifically for the proposed process. The installation of pipework and couplings will be carried out by a competent company or individual. As liquid based wastes will be transferred directly into a single tank, this ensures that a first-in-first-out principle is in place. 54. Operatives will supervise all loading and unloading activities. 55. Any transfers to and from tankers only take place after the relevant verification and testing has been undertaken by a suitably trained member of staff or manager. 56. Staff will always be present at the site to prevent 'tanker drive off'. 57.Transfers from tankers will be carried out by suitably trained staff. 58. Measures will be in place to ensure that all couplings are a correct fit to prevent them from loosening or becoming detached. 59. Transfers into and from tankers only take place in bunded areas designed to contain a worst-case spillage i.e. building 2. 60. If required, procedures will be in place to make sure that wastes due to be transferred comply with the carriage of dangerous goods.

Appropriate Measure	Site Assessment
	61. If required, the transfer of waste from a tanker to a drum or vice versa will be undertaken in a dedicated area, pipes and valves will be checked before and during any transfers. Transfers from tankers will always be within the reception pit within building 2. 62. The operator has a spillage procedure in place to contain any spillages. The operator will record any spillages that occur at the site. 63. Tankers will not be used as blending or reaction vessels. 64. Waste of similar composition may be mixed within the reception pit in building 2; these will then be directed into the treatment plant within building 1. 66. Sludges will be pumped, not poured. 67. N/A - the site will not be loading/offloading odorous, flammable or volatile liquids between bulk storge tanks. 68. N/A - The site will follow safe operating procedures designed to reduce the risk of explosion and fugitive emissions. 69. The operator will carry out routine maintenance to prevent failure of the plant or equipment in accordance with manufacturer requirements. 70. The site will continue using the waste tracking system that began during the pre-acceptance phase for the time the waste is kept at the site. Routine maintenance is in place in accordance with manufacturer recommendations to prevent the failure of plant or equipment.
4.3 – Aerosol storage	71. Aerosols will be stored within building 3 in the designated storage area. Aerosols will not subject to treatment, they will form part of the repackaging activity and only stored

Appropriate Measure	Site Assessment
	prior to offsite removal. They will be stored undercover in well-ventilated containers within building 3. 72. Aerosol canisters will be segregated from other flammable wastes. Each storage area is kept separate i.e. split into hazardous and non-hazardous storage areas. 73. Aerosol canisters will be stored in containers, all material within building 3 is stored on sealed drip trays to contain any liquids that are accidentally released from containers. 74. During storage, lids on containers holding aerosol canisters must remain securely closed at all times when not being filled, emptied or internally inspected. 75. Containers used to store canisters will never be overfilled. 76. Any cages used to store the canisters will be robust, fire resistant and of a suitable mesh size to constrain canisters and prevent ejection. 77. Different types of canisters will be segregated to prevent thermite sparks.
4.4 – Sorting, repackaging and bulking	78 – 89. The repackaging activity within Building 3 comprises a waste transfer operation involving the bulking of wastes without decanting or emptying contents between containers. No decanting, pouring or direct transfer of liquids between containers will take place as part of this activity. Wastes remain within sealed containers throughout handling, thereby preventing any potential for mixing or release. Waste subject to the repackaging activity will be stored in designated containers, bins, drums or IBCs. All containers will be clearly labelled to ensure that the contents are known at all times and to prevent any inadvertent mixing of waste streams. Waste streams will not be mixed as part of onsite operations.

Appropriate Measure	Site Assessment
	The site is applying for D14, D15 and R13 to enable the repackaging and bulking of waste. The permitted activity will be undertaken in a designated building i.e building 3. All waste is stored in designated containers, bins, drums or IBCs. All containers will be suitably labelled so that the contents of each container is known to ensure no mixing of waste streams occurs, this ensures that waste will never be stored in the same containers and therefore will not react with each other.
4.5 – Laboratory smalls	90. Laboratory smalls will not be accepted as part of the application. 91 N/A – see above 92. N/A – see above
5 – Waste treatment	
5.1 – General waste treatment	1. Waste is to be treated through the wet waste treatment plant which has been purpose built to enable the efficient processing of waste for recovery and minimise the amount of waste to be disposed of. Pre-acceptance and Waste acceptance procedures will be implemented at the site to ensure that no unsuitable or unwanted waste is introduced to the treatment process. 2. The treatment activities and associated abatement i.e. LEV system are detailed within the application documents, in summary Buildings 1 and 2 will include an extraction system, which will extract air, via a series of activated carbon filters for emissions control, with air exhausted via an external elevated flue for dilution and dispersion of residual emissions. Vessels/tanks will be monitored as part of the process.

Appropriate Measure	Site Assessment
	A full site layout plan and process flow of the site operations and associated treatment activities are shown in Appendix I.
5.2 – Aerosol canister treatment	1. Aerosols will be stored within building 3 in the designated storage area. Aerosols will not subject to treatment, they will form part of the repackaging activity and only stored prior to offsite removal. They will be stored undercover in well-ventilated containers within building 3. 2, 3,4,5, 6, & 7. N/A - There are currently no proposals to treat any aerosol canisters. 8. Each storage area is kept separate i.e. split into hazardous and non-hazardous storage areas. 9. The above storage areas have a proposed limit of 10 tonnes and are subject to daily visual inspections to ensure that material does not over accumulate at the site. All recovery and disposal routes will be identified for each waste stream, the operator will seek to set up contracts for the regular removal of wastes. 10. N/A – no LPG piping systems 11. N/A – no proposals for treatment relating to aerosol canisters. 12. Material stored within skips will be located in building 3 which is a covered building with ventilation, material stored in skips will only comprise solid waste streams, any liquid wastes will be stored in enclosed containers, IBCs or drums etc. 13. Any flammable liquids will be stored within suitably designed containers which is adequate for the specific liquid stored within it.

Appropriate Measure	Site Assessment
	14. Metals will be removed via dosing/coagulation/flocculation and have partial treatment removal via carbon and sand filter units, any residues will be allowed to dry prior to metals being set for further recycling.
5.3 – Record keeping for all treatment residues	1. Waste tracking system is in place and has been discussed in Section 3.3 of this table.
6 – Emissions control	
6.1 – Point source emissions to air	1 - 2. Building 1 & 2 will include an extraction system, which will extract air, via a series of activated carbon filters for emissions control, with air exhausted via an external elevated flue for dilution and dispersion of residual emissions. This building will be operated under negative pressure and reduce potential noise, dust and odour that could be emitted from the site. Waste gases arising from the treatment processes and storage areas within Buildings 1 and 2 will be abated using a dust filter and activated carbon medium. The integrity of the building and abatement systems will be monitored as part of the site daily inspections, housekeeping schedule or maintenance schedule. With regards to point source emissions to air, an Emissions Modelling Assessment has been produced of the potential air quality impacts to accompany the application, it has been concluded that "No significant impacts are predicted on long and short term AQLVs/EALS at any receptor locations and no exceedences of relevant AQLVs and EALs are predicted at any relevant locations of exposure.". 3. The operator has assessed the fate and impact of substances emitter to air in accordance with the Environment Agency's risk assessment guidance, as stated above an Emissions Modelling Assessment has been produced of the potential air quality impacts to accompany the application. 4. The operator will implement several abatement techniques which have been discussed above, this includes dust filters and activated carbon.

Appropriate Measure	Site Assessment
	5. Vent and stack locations have been assessed and designed accordingly as detailed within the Emissions Modelling Assessment. 6. All infrastructure and abatement will be monitored as part of daily inspections and maintained in accordance with the manufacturer requirements. In the event that any issues are identified when inspecting and monitoring the effectiveness of the abatement, the operator will initiate repair works to be carried out. 7. Abatement has been designed to minimise water vapour plumes.
6.2 – Fugitive emissions to air (including odour)	1. The site will use appropriate measures to prevent fugitive emissions to air including dust, mud, litter, odour and noise. A Noise Impact Assessment and Noise & Vibration Management Plan have been produced to accompany the application to demonstrate that the buildings are of a suitable construction to reduce emissions of noise and vibration. An Odour Management Plan (OMP) has been produced as part of the application to ensure that all potential odour sources are identified and controlled. The OMP has been produced in accordance with the H4 Odour Management guidance, this includes routine dynamic olfactory monitoring and sniff testing: Whilst dust, mud and litter are not considered to present a problem at the facility, the EMS details control measures with relation to these emissions. 2,3 & 5. The operator has enclosed the treatment process situated within Building 1. Building 2 and 3 enable access at the front to allow for the unloading of material into the relevant storage areas.

Appropriate Measure	Site Assessment
	Building 1 & 2 will include an extraction system, which will extract air, via a series of activated carbon filters for emissions control, with air exhausted via an external elevated flue for dilution and dispersion of residual emissions. This building will be operated under negative pressure and reduce potential noise, dust and odour that could be emitted from the site. Waste gases arising from the treatment processes and storage areas within Buildings 1 and 2 will be abated using a dust filter and activated carbon medium. The integrity of the building and abatement systems will be monitored as part of the site daily inspections, housekeeping schedule or maintenance schedule. With regards to point source emissions to air, an Emissions Modelling Assessment has been produced of the potential air quality impacts to accompany the application, it has been concluded that "No significant impacts are predicted on long term and short term AQLVs/EALS at any receptor locations and no exceedances of relevant AQLVs and EALs are predicted at any relevant locations of exposure. Activities undertaken at the site are not considered to produce dust & particulates, mud or litter that could cause pollution at sensitive receptors. Whilst the above aren't likely to present a problem at the site, the EMS outlines control measures with regards to each of these aspects 4. The site implements pre-acceptance and waste acceptance checks to ensure the acceptance of compliant waste streams. These have been detailed in Section 3 of this table 6. The operator will set up a leak detection and repair programme to identify and mitigate any fugitive emissions from the treatment plant and associated infrastructure. 7 & 8. The operator will inspect and clean all waste storage and treatment areas as part of daily inspections and ongoing housekeeping.

Appropriate Measure	Site Assessment
	All plant and equipment are subject to manufacturer maintenance timeframes; the operator will maintain records of all maintenance requirements. The site will be inspected daily paying attention to the operation of plant & equipment, abatement systems, drainage, containment, pipework, building integrity etc. to identify any issues that may result in the release of fugitive emissions. 9. Drums and vessels will be constructed of suitable materials for the proposed contents, to prevent risk of corrosion or tank failure. The above will be inspected as part of daily checks. 10. Tankers will be washed out into the reception pit located within building 2 which benefits from the previously detailed extraction system. 11. N/A – no pre-treatment and post-treatment shredder plant at the site. 12. Due to the nature of waste accepted at the site and the way they are handled and processed, dust is not considered to be generated as a result of onsite activities, no Dust Management Plan has been required as part of the application. 13. The operator will implement procedures to minimise the amount of time odorous wastes is spent in storage and handling systems. The treatment plant is an ongoing process to ensure that odorous waste isn't spent in an item of plant longer than it is required. 14. Building 1 & 2 will be operated under negative pressure and benefit from an LEV abatement system. All material stored within building 3 will be situated within skips, sealed containers, bins, drums and Intermediate Bulk Containers (IBCs). 15. The above abatement system will be subject to preventative maintenance; any maintenance will be carried out by suitably qualified engineers in accordance with manufacturer requirements.

Appropriate Measure	Site Assessment
	16. No contaminated water stored at the site. All wet wastes will be stored in tanks or within the relevant items of plant during the treatment process. 17. Any substantiated complaints relating to odour will be investigated further. Odour emissions will be monitored using the following: *Routine dynamic olfactory monitoring* • The Odour Control Unit (OCU) has been designed to efficiently destruct potential odourous compounds. There are no BAT based odour emission limits for the treatment of water based liquid wastes. However, the EU BAT Conclusions Document for Waste Treatment contains a BAT based odour limit for treatment of biological waste, of between 200 and 1,000 Odour Units (OU).m^{-3}. It is anticipated that the upper end of this range will be achieved as a worst case residual odour concentration from the OCU. • Sampling using dynamic olfactometry according to EN 13725 will be undertaken every 3 months to establish residual odour concentrations arising from the stack serving the OCU and include assessment against the above criteria. Should all monitored odour concentrations be below 1,000OU.m^{-3} during the first 12 months of operations, monitoring would then be reduced to a period frequency of every 6 months. • Stack sampling will be undertaken to collect an air sample, in accordance with the EA Stack Emissions Monitoring Method Implementation Document for EN 13725. The stack has a sample port which has been designed in accordance with EA M1 Guidance. During each periodic test, bag samples of air will be collected from the stack and this subsequently exported from site for assessment of odour concentration in accordance with EN13725 and associated EA guidance. Stack sampling and post sampling assessment will be undertaken by a suitably accredited contractor.

Appropriate Measure	Site Assessment
	• In the event that the residual Odour Concentration exceeds 1,000 $OU.m^{-3}$ from a routine periodic test, the operator will undertake immediate investigative action to identify the fault, take remedial action as necessary and then commission a further test to verify that the fault has been rectified. • Records of all sampling and any remedial action taken will be logged in the Site Diary and be available for inspection by the EA *Olfactory monitoring at site boundary (Sniff testing)* • In addition to the routine dynamic olfactory monitoring, odour will be monitored using sniff testing at the site boundary on a daily frequency and if there is a spillage of potentially odorous material, if an odour is detected on-site or in the event of odour complaint arising. During monitoring, the site supervisor, or designated, trained staff member, will monitor odour around the entire site perimeter and an Odour Diary will be completed. • The results of monitoring exercises and any remedial action taken will be entered into the logbook which will be available for the EA to inspect upon request. The name of the site supervisor/odour assessor will be stated in the site's diary along with notes on weather including precipitation, temperature, wind speed and direction (from Met Office information). • Should the monitoring conclude that a certain activity/waste is giving rise to odour which is migrating offsite, steps will be taken to reduce the impact of this activity, which may include, but is not limited to; removal offsite to a suitably licensed facility, faster processing/lower storage rates, pumping and removal of standing surface water etc. • The site supervisor/odour assessor will be suitably trained to carry out these duties. Prior to carrying out a routine odour check, the relevant member of staff will vacate the site for a period of 30 minutes and then carry out the assessment on their return to ensure they are not desensitised to the odour.

Appropriate Measure	Site Assessment
	18. Upon receiving any substantiated odour complaints, the operator will review the OMP and implement the required changes to avoid reoccurrence. 19. The site benefits from a site-specific Odour Management Plan to prevent and minimise potential odorous emissions from the facility. The OMP has been prepared in accordance with the EAs guidance *'Odour management: comply with your environmental permit'.* The above procedures will prevent fugitive emissions to air.
6.3 – Emissions of noise and vibration	1. The facility has been designed so that potential source of noise are away from receptors i.e. buildings face inwards to the centre of the site and away from surrounding receptors. 2. A Noise Impact Assessment and Noise & Vibration Management Plan have been produced to accompany the application to demonstrate that the buildings are of a suitable construction to reduce emissions of noise and vibration. The above documents outline measures and infrastructure in place to control noise i.e. locating plant within buildings, plant maintenance, staff training etc. 3. The site will operate in accordance with a Noise & Vibration Management Plan which will be subject to regular review. 4. The Noise & Vibration Management Plan identifies all sources of noise & vibration and outlines control measures implemented at the site.
6.4 – Point source emissions to water and sewer	1 - 3. The operator will identify the main constituents at the point source emission to sewer from the treated water tank. A H1 sewer assessment has been produced as part of the application following the Environment Agency's risk assessment guidance. A trade effluent consent issued by Southern Water is in place at the site to control discharges to sewer. In addition, water is treated as part of the treatment process and will be recirculated through the plant, only once the water is not suitable for reuse after

Appropriate Measure	Site Assessment
	treatment will it be discharged to sewer under the aforementioned trade effluent agreement. 4. Water subject to discharge will have been subject to physico-chemical and biological treatment via the wet waste treatment plant to reduce potential emissions to sewer. A process flow diagram detailing a full breakdown of treatment activities is illustrated on Drawing No. 2499-06 which accompanies the application. 5. N/A the site is not currently proposing to clean containers.
6.5 – Fugitive emissions to land and water	1. The site will implement appropriate measures to control potential fugitive emissions and ensuring that they do not cause pollution. 2. The site comprises an impermeable concrete surface with suitable drainage that benefits from a penstock valve that can be shut-off to provide containment. 3. The wider site is required to provide secondary containment which considers the industry standards detailed in CIRIA guidance C736 – Containment system for the prevention of pollution. The site will benefit from the construction of a concrete wall and/or kerbing around the perimeter of the site with a ramp at the site entrance to the yard which will create a sitewide containment area as detailed on the Site Layout Plan. The drainage system benefits from a penstock (shut off) valve which will be initiated during a fire event or tank failure to ensure the external yard is sealed. Buildings 1 & 2 are separately bunded to ensure that firewater does not enter the buildings during a fire event. 4 & 5. Surface water and process water are kept separate at the site, no waste is stored externally at the site and surface water will only comprise clean rainwater, water within the wet waste treatment plant will be treated and either recirculated back into the process or discharge to sewer under a Trade Effluent Consent and in accordance with approved limits within the EP (which are still subject to assessment). See Point 1 in

Appropriate Measure	Site Assessment
	Section 6.4 above, a H1 sewer assessment has been produced as part of the application in accordance with the Environment Agency's risk assessment guidance. 6. Plant and equipment are inspected as part of the daily inspections, in the event that any leaks are detected, they will be initiated for immediate repairs. All plant and equipment will be maintained in accordance with manufacturer requirements. 7 & 8. The site has external tanks which are used to store treated water prior to recirculation or discharge, if required these tanks can be used as buffer storage in the event of abnormal operation scenarios and incidents, however it is extremely unlikely that this scenario will occur at the site as waste are pre-booked into the facility to ensure that there is always capacity for waste entering the facility. 9. The site will use water to wash out tankers, this will be undertaken within the reception pit located in building 2 and ensures that the water used for washing is directed back into the treatment plant. 10. Oils stored at the site, including those arising from the wet waste treatment process will be stored within suitable containers within a building. 11 - 15. A spillage procedure is implemented at the site and suitable spills kits, booms etc.. are available at the site to manage any potential spillage. All staff will be trained on the spillage procedure in line with the manufacturer's health and safety advice as part of the introductory training. The spillage procedure is in place to prevent any potential spillage from entering onsite drains or nearby watercourses. Suitable spills kits, booms etc.. are available at the site. The spillage procedure will include information on the handling and disposal of waste produced from a spillage.

Appropriate Measure	Site Assessment
	16. The site will use water to wash out tankers, this will be undertaken within the reception pit located in building 2 and ensures that the water used for washing is directed back into the treatment plant. 17. The site will minimise the use of subsurface equipment and infrastructure, the operator will be utilising above ground storage tanks for liquid and sludge wastes. The routing of any underground drains has been identified and will be inspected to ensure that it is functioning correctly. 18. The site will benefit from an impermeable concrete surface. The wider site is required to provide secondary containment which considers the industry standards detailed in CIRIA guidance C736 – Containment system for the prevention of pollution. The site will benefit from the construction of a concrete wall and/or kerbing around the perimeter of the site with a ramp at the site entrance to the yard which will create a sitewide containment area as detailed on the Site Layout Plan. 19. The site will have a documented inspection and maintenance programme for impermeable surfacing, containment and infrastructure. The operator will maintain records to demonstrate the implementation of any maintenance.
7 – Emissions monitoring and limits	
7.1 – Emissions to air	1. As detailed in the previous section, an Emissions Modelling Assessment has been submitted with the permit application and includes the emissions inventory. The assessment includes information of point source emissions to air. It has been concluded that "No significant impacts are predicted on long term and short term AQLVs/EALS at any receptor locations and no exceedances of relevant AQLVs and EALs are predicted at any relevant locations of exposure. Emission limits will be set as part of the permit determination and in accordance with BAT.

Appropriate Measure	Site Assessment
7.2 – Emissions to water and sewer	1. A H1 sewer assessment has been produced as part of the application following the Environment Agency's risk assessment guidance. A trade effluent consent issued by Southern Water is in place at the site to control discharges to sewer. In addition, water is treated as part of the treatment process and will be recirculated through the plant, only once the water is not suitable for reuse after treatment will it be discharged to sewer under the aforementioned trade effluent agreement. 2. The operator will monitor key process parameters at key locations throughout the treatment process; this includes sampling the water at the final treatment stage prior to discharge.
8 – Process efficiency appropriate measures	
8.1 – Energy efficiency	1. An Energy efficiency plan will be implemented in accordance with BAT 23. 2. Energy efficiency and use will be monitored regularly, and the operator will review and record measures for improving energy efficiency on an annual basis and take any action deemed necessary by the review. A breakdown of energy consumption by type of source will be included as part of the review. 3 - 5. All mobile and stationary plant and equipment utilised at the site will be subject to regular maintenance to optimise operating efficiency. A record of fuel consumption will be maintained and will be used to identify any abnormal fuel consumption that requires investigation. All staff will receive appropriate training for operations at the site, which will include maintenance procedures and basic housekeeping (e.g. switching lights and equipment off when not in use). Low energy lighting systems will be used within the building. The operator will regularly review and update energy balance as part of the facility's management systems. 6. The site will implement techniques to avoid gross energy inefficiencies i.e. containment methods for buildings.

Appropriate Measure	Site Assessment
	7. The operator will implement energy efficiency measures in accordance with the following guidance "Energy efficiency standards for industrial plants to get environmental permits" – published February 2016, Updated July 2019.
8.2 – Raw materials	1. The operator will keep a list of raw materials used at the site. 2. The operator has reviewed the availability of alternative raw materials and will continue to review these throughout the lifetime of the operation. 3. The operator has reviewed the availability of alternative raw materials and will be using the most suitable option. 4. To ensure the appropriate use of raw materials and prevent release of any substances, Elliot Environmental Drainage Limited will follow quality assurance procedures when procuring materials and use specialist suppliers. When selecting raw materials priority will always be given to those with the least environmental impacts compared to any alternatives (where practical). There are several secondary raw materials utilised as part of the treatment process. The consumption of secondary raw materials will be monitored. Chemicals and polymers will be utilised as part of the water treatment process and will be stored in designated storage areas in suitable cabinets. Where relevant, all substances are assessed for COSHH (Control of Substances Hazardous to Health) compliance, the site will retain Material Safety Data Sheets (MSDS) for all materials handled and stored on site. Whilst the release of any substances is considered negligible, it is important to note that the facility will benefit from containment in line with CIRIA C736 which controls and prevents the release of any substances.

Appropriate Measure	Site Assessment
	A full list of the raw materials required to operate the permitted activities are detailed in the accompanying application documents.
8.3 – Water use	1. The operator will optimise water use to reduce the volume of waste water generated. Water is required for the operation of the wet waste treatment plant. 2. As part of the treatment process, water will be treated to enable recirculation within the plant, only once the water is not suitable for recirculation will it be discharged to sewer under a trade effluent agreement. The above ensures that water consumption is minimised by treating and recirculating water. 3. The operator will review water use at least every 4 years. 4. The operator has produced flow diagrams for the operation detailing the water use throughout the treatment plant. 5. As detailed above, the operator will be recirculation water within the treatment process to reduce emission to water. Only once the water is not suitable for reuse into the plant will it be discharged to sewer. 6. The site will establish water quality requirements associated with each activity and identify areas where water could be substituted, as detailed previously, the operator will be treating and recirculating water within the process to improve efficiency and minimise water consumption. 7. The operator will treat water as part of the process and keep it segregated within designated storage tanks prior to discharge or recirculation. 8. The operator will minimise water used for general housekeeping and cleaning. Due to the site surfacing and waste types accepted and stored at the site, the potential for cleaning and washing of plants, equipment and surfaces will be significantly reduced. The

Appropriate Measure	Site Assessment
	site will use water to wash out tankers, this will be undertaken within the reception pit located in building 2 and ensures that the water used for washing is directed back into the treatment plant. 9. The operator will record fresh water use and record it at each usage point within the process.
8.4 – Waste minimisation, recovery and disposal	1. The site implements a standalone RMP which has been produced to ensure the following: • generation of residues from waste treatment is minimised; • optimises the reuse, regeneration and recycling of residues; • waste and material not suitable for reuse, regeneration or recycling is adequately disposed of. 2. Where there is a requirement for disposal of waste, the operator will carry out an assessment to identify the best environmental option for disposal. 3. The RMP will be reviewed in the event that treatment activities change or if the site utilises any new raw materials as part of the operation

3 Biological Waste Treatment: Appropriate Measures

3.1 The following table demonstrates how the operator will comply with Appropriate Measures for Biological Waste Treatment. The appropriate measures assessment detailed in Table 3 below apply to areas of the treatment process where biological treatment is undertaken.

Table 3 - Biological Waste Treatment Assessment – Appropriate Measures

Appropriate Measure	Site Assessment
1 - When appropriate measures apply	
1.0 – Where appropriate measures apply	The site is applying for a Biological Waste Treatment activity, this technical guidance will be applicable.
1.1 – The waste water treatment activities this guidance applies to	The site will be undertaking biological treatment of waste.
1.2 – When this guidance applies to a specific process. 1.3 – Implementing appropriate measures at new and existing facilities	The site is a new facility that will be accepting waste that will be subject to biological treatment. A BAT assessment has been prepared to demonstrate how the site complies with the relevant BAT.
2- Definition of biodegradable and sewage sludge	
2.1 – Biodegradable	The site will be waste streams that will undergo biological aerobic treatment.
2.2 – Sewage Sludge	N/A – The site will not be accepting sewage sludge.
3 – Bespoke wastes suitable for biological treatment	
3.1 – Animal by-products	N/A – The site will not be accepting animal by-products
3.2 – Energy crops and by-products	N/A – The site is not an AD facility and will not be accepting energy crops and by-products (residues).
3.3 – Wash down water, liquor and leachate	N/A – The site process will not produce incidental wastes such as wash down water, liquor or leachate.

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4 – Site location, design and capacity	
4.1 – Site location	1. The operator has considered the potential impacts on local sensitive receptors when selecting the site and produced to required management plans with relevant control measures. 2. The operator has chosen the location of the site to prevent and minimise fugitive emissions to air. Operations have been designed so that processing takes place within buildings. 3. A climate change risk assessment has been produced as part of the Environmental Management System (EMS) which covers site operations and considers flood risk, drought, high temperatures and extreme weather events, these have been summarised below: Flood - The site is located within a Flood Zone 1 which is classified as having the lowest probability and risk of fluvial flooding. The site is located on previously developed land comprising a concrete pad and buildings. All water (surface and rainwater) drains are as detailed on the Site Layout Plan (Drawing No. Drought - Due to the nature of loads and how they are delivered, loaded, and unloaded at the site it is not anticipated that droughts or warm weather would have an impact on the operations. In extreme cases such as a hosepipe ban or water shortage, the site will ensure there is additional water available to ensure the process can still function correctly. High temperatures - Due to the nature of loads accepted at the site and the method in which they are delivered, handled and stored; dry weather periods will not increase the risk of dust

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	Adverse Weather events - The site will be set up to receive weather alerts from the Met Office for the following weather conditions which could cause a potential complaint off site or potential breach of permit. <u>Heavy rainfall</u> Vehicles exiting the site will undergo a more thorough check to ensure mud is not tracked off site. Should long periods of rainfall be likely, the site may consider hiring (as a result of daily inspections) a third-party road sweeper to cover the wet period to ensure surfaces are swept thoroughly throughout the day. <u>High winds</u> Due to the nature of loads and how they are delivered, loaded, and unloaded at the site, high winds (>30mph) will not impact the operations. <u>Dense fog (poor visibility)</u> The site will reduce operational intensity in conditions of poor visibility such as dense fog to reduce the risk of vehicle and tank collisions or other potential accidents. The site has been designed so that all access to buildings face inwards towards the centre of the site ensuring that they are facing away from surrounding receptors.
4.1 – Site design	1. The site has been designed so that all access to buildings which are utilised for waste storage and handling face inwards towards the centre of the site ensuring that they are facing away from surrounding receptors. External storage tanks are situated in the southeastern corner of the facility which is the furthest point from adjacent commercial receptors.

Appropriate Measure	Site Assessment
	2. The site and associated treatment plant has been designed to avoid any unnecessary handling of waste between each step in the process. The site has been designed with one reception pit in building 2, this all piped into external tanks and then through the treatment plant within building 1, this ensures that waste is only handled once, any solid outputs from the process will be transferred to the relevant storage area prior to offsite removal. 3. The plant has been designed through various communications between the operator, consultants, plant manufacturer and Environment Agency to meet the relevant industry standards. 4. Building 1 and 2 benefits from an LEV system to abate VOCs that may arise from the process. 5. N/A – no digestate and compost liquor accepted or stored at the site. 6. The site has been designed so that all access to buildings which are utilised for waste storage and handling face inwards towards the centre of the site ensuring that they are facing away from surrounding receptors, buildings are designed to prevent loss of containment. 7 & 8. Good site design and process flow reduces the risk of cross-contamination, the plant has been designed to ensure it only takes waste of a similar nature and will never mix hazardous and non-hazardous loads or loads with different characteristics. The process allows for a flush between processing of batches to ensure risk of cross-contamination is minimal within the plant. 9. The plant has been designed to prevent any environmental impacts. 10. Infrastructure will be constructed and installed by suitably competent contractors.

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	11. The site will benefit from secondary containment in accordance with CIRIA 736 which controls and prevents the release of any substances. 12. A suitably qualified engineer will provide construction quality assurance (CQA) of site infrastructure. All pipe work has been designed to allow for inspection and/or integrity checks. 13. All drainage and vessels used for storage of wastes will be accessible to enable cleaning and maintenance. 14. Underground tanks i.e. the interceptor are accessible to enable inspection. The drainage system benefits form a shut off valve. 15. The plant and associated pipework and tanks have been designed and configured to enable any future decommissioning.
4.2 – Site capacity	1. The site has been designed to accept, handle and store the proposed throughput and to prevent any environmental impacts that may cause pollution. 2. Due to the nature of waste accepted at the site, it is not considered likely that they would be impacted by seasonal changes in feedstock supplies. 3. The site has been designed to enable space for the operation of all plant and equipment. 4. The EMS will and EP will detail the storage capacity for all waste stored at the site. Residence times will be clearly detailed in the EMS.
5 – General management appropriate measures	
5.1 – Management system	1 & 2. The site will operate in accordance with an EMS that has been prepared in accordance with the "Develop a management system: environmental permits" guidance published 01/02/2016, last updated 03/04/2023.

Appropriate Measure	Site Assessment
	4. The EMS covers all elements in relation to the site operations i.e. staffing roles & responsibilities, staff training and competence, performance measures and monitoring requirements and targets (where applicable), relevant legislation, guidance and appropriate measures, process descriptions & controls, maintenance programmes, emergency preparedness and contingency planning. Where required, the EMS references site-specific documents which provide more targeted details on the specific environmental control elements i.e. Odour, Fire, Air and Water emissions control etc. 5.The EMS will cover any required monitoring, investigation of incidents & record maintenance. The EMS will be reviewed on annual basis. 6. Senior management will review the EMS on an annual basis or sooner in the event of operational change or breach, any improvements will be initiated for action within 5 working days, with any required works carried out as soon as practicably possible which will be dependent on the availability of suitable licensed contractors. 7. The site will regularly review their operations and look at cleaner technologies that improve the efficiency of the operation and reduce any potential pollution incidents. The site has been designed against the best available techniques. 8. The plant and associated pipework and tanks have been designed and configured to enable any future decommissioning. The potential emissions from the operation of plant i.e. emissions to air and sewer have been assessed during the permit application. 9. The site will have a written procedure for proposing, considering and approving changes to procedures or infrastructure related to storing or treating waste or pollution control. This enables the operator to track and control the process of change.

Appropriate Measure	Site Assessment
	10. A climate change risk assessment has been produced as part of the Environmental Management System (EMS) which covers site operations to manage future risks. 11. The site will regularly review and compare the facility's performance against relevant sector guidance and standards. 12. The EMS will implement measures for handling, treating and storing waste. Pre-acceptance and Waste Acceptance procedures are implemented to ensure appropriate waste stream management, all waste streams to/from the site are recorded on the relevant Waste Transfer Note or Hazardous Waste Consignment Note. 13. A Site Condition Report has been prepared and will be regularly reviewed and maintained through the lifetime of the operation. 14. The site has prepared a standalone Residues Management Plan, Accident Management Plan, Site Condition Report, Site Layout Plan, Odour Management Plan. Fire Prevention Plan and Noise & Vibration Management to accompany the Permit Application. This will be reviewed and maintained in accordance with the EMS. The EMS will include a document control procedure for all other management documents implemented at the site providing timeframes for periodic review along with the version control.
5.2 – Inspection, maintenance and monitoring	1. The EMS provides a schedule of inspection and maintenance for all plant, equipment and pollution control infrastructure i.e. buildings, surfacing, containment walls, drainage, abatement systems etc. 2. All plant and equipment will be maintained in accordance with manufacturer requirements. 3. N/A – See above.

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	4. The site will maintain records of all maintenance works carried out at the site. 5. N/A – Site is not AD, IVC or MBT plant. 6. The site stores spare parts, maintenance oils and chemicals that are required to maintain the plant. 7. N/A – New facility and treatment plant.
5.3. Staff competence	1. The EMS details the staffing structure at the site, the site ensures that adequate number of staff are present on site to enable the operation of the facility, all staff are subject to introductory training and refresher training, details of any relevant training, qualifications and experience will be maintained. Training is provided to all site users who handle waste on site and those in charge of administration and reporting. In-depth training will also be provided to drivers responsible for collecting wastes from the site of production. 2 & 3. The site will be operational Monday to Saturday, 24 hours a day. Outside of operational hours, the site will be monitored by an external monitoring company who have staff members contact details who they contact in the event of an emergency. Site Security infrastructure and monitoring are detailed within the EMS to ensure that they are implemented. 4. The design, installation and maintenance of infrastructure and plant will be carried out by a certified company. Maintenance will be carried out in accordance with manufacturer recommendations. 5. Appropriately qualified managers will be available at the site; in this instance this includes the operator who will be obtaining the relevant WAMITAB qualification to ensure that the site is operated in accordance with an EP and the relevant appropriate

Appropriate Measure	Site Assessment
	measures. The operator obtaining the required technical competence will ensure regular attendance at the site as they will be present on the site for most operational days.
5.4 – Accident management Plan	Please refer to Accident Management Plan Sections within Table 1 and Table 2 of this assessment which details the Accident Management Plan contents. Whilst the above refers to the non-hazardous and inert waste: appropriate measures and chemical waste: appropriate measures, a review of both measures has identified that the requirements are the same across both appropriate measures.
5.5 – Preventing accidental emissions	1. The site has prepared a Site Layout Plan which illustrate the drainage scenario, this will be made readily available to emergency services. 2. The AMP, FPP and Containment Report provide details of how the site will contain any process waters, firefighting water and spillages. The reception pit is located within a sealed area, and wastes will not be released until the tanker is in position next to the pit, within Building 2. Should waste be spilled outside the area of the pit, this will drain to a large Aco drain in front of the hydro tip (Highest risk area). This will capture liquid, which will run into a pump chamber (alarmed) which will also pump liquids back into hydro tip. 3. The AMP and EMS outline the spillage procedure implemented at the site to minimise the risk of an accidental spill, the procedure is in place to ensure that no spill can enter watercourses, sewer or contaminate land. 4. The FPP details the procedures for containing firewater to prevent any release to land, water or sewer. The wider site is required to provide secondary containment which considers the industry standards detailed in CIRIA guidance C736 – Containment system for the prevention of pollution. The site will benefit from the construction of a concrete wall and/or kerbing around the perimeter of the site with a ramp at the site entrance to the yard which will create a sitewide containment area as detailed on the Site Layout Plan. The drainage system benefits from a penstock (shut off) valve which will be initiated during a fire event or tank failure to ensure the external yard is sealed.

Appropriate Measure	Site Assessment
	Buildings 1 & 2 are separately bunded to ensure that firewater does not enter the buildings during a fire event. 5. As detailed above, the wider site is required to provide secondary containment which considers the industry standards detailed in CIRIA guidance C736 – Containment system for the prevention of pollution, this includes containment for overflows, tank failures, tank wall penetrations and leaks from any plant or machinery. 6. Any liquids or firewater captured by the secondary containment will be pumped out and tankered off site to a suitably licensed facility.
5.6 – Security measures	1 & 2. The site is operational 24 hours a day Mon-Sat and benefits from CCTV, security gates and concrete walls to prevent unauthorised access and vandalism. The above security measures ensure that damage to equipment, theft, fly-tipping and arson are prevented.
5.7 – Fire and explosion prevention	1. The site will operate in accordance with an approved Fire Prevention Plan (FPP) that has been prepared to meet the requirements of the Fire Prevention Plan Guidance. 2. The site will undertake daily checks for dust and fluff on plant/equipment before and use of equipment at the start/end of each working day. 3. As detailed within the EMS, all mobile and fixed plant on site including vehicles in the fleet are subject to annual manufacturer maintenance to ensure proper working order in the form of service contracts. Site management will undertake or delegate additional preventative maintenance checks on a more frequent basis i.e. daily, before, during and 1 hour at the end of each working day. The site will construct vehicle crash barriers (Armco, or similar) around building walls and bund walls used for the external tank containment to prevent any moving vehicles damaging buildings and plant or containment features

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	4. All staff are trained on emergency and incident response procedures to ensure that all alarms are set and responded to. 5. No sprinkler system required at the site due to the nature of wastes accepted, the storage volumes, residence times and the manner in which material is handled, please refer to the site-specific Fire Prevention Plan (FPP) for alternative measures implemented at the site to negate the requirement for sprinkler systems. All pressure relief valves on tank will be maintained in accordance with manufacturer requirements. 6 & 7. All workers are protected and monitored in line with relevant Health & Safety regulations. All assessments will be carried out in line with 8 to 16. N/A – Site will not be operation and AD or composting plant.
5.8 – Firefighting	1. The FPP demonstrates actions taken in a fire incident to extinguish a fire. All site staff are subject to introductory training and refresher training to ensure they are aware of the contents and requirements of the FPP. 2. The FPP provides details of the water supply that is available at the site to tackle a fire. There is a hydrant located on site which will be utilised during a fire event. 3. The FPP details the procedures for containing firewater to prevent any release to land, water or sewer. The wider site is required to provide secondary containment which considers the industry standards detailed in CIRIA guidance C736 – Containment system for the prevention of pollution. The site will benefit from the construction of a concrete wall and/or kerbing around the perimeter of the site with a ramp at the site entrance to the yard which will create a sitewide containment area as detailed on the Site Layout Plan. The drainage system benefits from a penstock (shut off) valve which will be initiated during a fire event or tank failure to ensure the external yard is sealed.

Appropriate Measure	Site Assessment
	Buildings 1 & 2 are separately bunded to ensure that firewater does not enter the buildings during a fire event. 4. The onsite drainage system has been designed so that it is isolated from flammable waste storage areas, all flammable/combustible wastes are stored within Building 3.
5.9 – Record keeping and procedures	1. The operator will maintain a record log of accidents, incidents, near misses, procedural changes, abnormal events and results of maintenance inspections (if an issue has been identified). Site management will investigate any incidents relating to the above and implements suitable measures to avoid reoccurrence. An inventory of substances that could have environmental consequences will be maintained, any substances which may result in environmental consequences will be suitably stored in accordance with recommended storage methods. Any chemicals used in the process will be stored within appropriately bunded areas. Hazardous liquid wastes will also be stored in appropriately bunded areas on-site. As such, there are sufficient pollution prevention measures in place, such that the risk to soil and ground water is considered negligible as there is not considered to be any significant pathway between source and receptor. 2. The Environment Agency (EA) will be notified without delay if the operator detects any event that are causing, or may cause, significant pollution, this will include the following: • Malfunction, • Breakdown of plant & equipment or operational failure, • An accident, • Emission of substance not controlled by an emissions limit, • Breach of emission limit.
5.10 – Contingency plans and procedures	1. The EMS outlines contingency procedures which will be implemented at the site to ensure that site will comply with the EP with regards to limits, capacity, waste acceptance, adverse weather events etc.

Appropriate Measure	Site Assessment
	2. The contingency procedures form part of the EMS which details waste descriptions, use of specialist waste contractors, environmental risk and relevant control measures. 3. The operator will identify contingency options for use over the short term (1 to 2 weeks), medium term (4 to 6 weeks) and the long term (up to 6 months). 4. Management plans and continency procedures will: • Identify technology and any malfunction and maintenance procedures • Include a record of spare parts • Define procedures to identify, review and prioritise items of plant which need a preventative regime. • Include all equipment or plant whose failure could directly or indirectly affect the environment or human health • make sure the operator has the spare parts, tools, and competent staff needed before you start maintenance 5. All feedstock suppliers and customers will be made aware of the sites contingency plans. 6. The operator will 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. N/A – no temporary storage required for additional waste at the site. 8. The management system will include procedures for auditing performance against all the contingency measures detailed above and for reporting the audit results to the site manager.

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	9. It is not anticipated that the site will be producing an end of waste material. In the event that they do, the operator will consider issues with storage capacity and materials that fail the end-of-waste specification as part of contingency procedures. 10. N/A – the site will not be operating an AD plant.
5.11 – Plant commissioning, validation and decommissioning	1. The EA will be notified of the commissioning of new plant. The proposed treatment plant has been designed to consider sensitive receptors and will comply with the EMS and relevant OMP. 2. A commissioning plan will be in place to minimise risk of pollution and harm to human health and the environment. 3 & 4. Monitoring requirements and parameters will be determined as part of the permit determination process. The monitoring parameters will be regularly reviewed during the lifetime of the facility. 5. All systems and components of the plant and buildings will be tested against operational requirements identified at the design stage. 6. Any relevant completion certificates will be in place. 7 & 8. Commissioning will be carried out to available industry standards. Any commissioning plan will include scope of performance tests, identification of any potential releases, qualifications of responsible operatives, processes for dealing with failed tests or other issues that may be encountered and health & safety measures. 9 – 12. N/A – the site will not be operating an AD plant.
5.12 – Decommissioning and mothballing	1. The operator has considered plant commission or ceasing activities at the design stage.

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	2. Upon any potential decommissioning the operator will prepare plans to minimise the risks during that time including the removal of items of plants throughout the life of the facility. 3. Before any plant is decommission the EA will be notified and provided a decommissioning plan. 4. Once decommissioning works are complete, the EA will be provided with a written report to verify that activities have been carried out in line with the decommissioning plan. 5. If any plant is commissioned after a period of dormancy, they will be directed by a suitable qualified person or in accordance with requirements set out in the appropriate measures. 6. The decommissioning plan will demonstrate that plant can be decommissioned without causing pollution and confirmation that the site will be returned to a satisfactory condition in line with a Site Condition Report. 7. The decommission plan will include details (but not be limited to) specified in this appropriate measures i.e removal and flushing of pipelines, dismantling of plant and associated infrastructure, soil testing (if required), measures proposed to avoid pollution risk and return the site to a satisfactory state and how any residues and wastes are cleared. 8 – 10. N/A – the site will not be operating an AD plant.
6 – Waste pre-acceptance, acceptance and tracking	
6.0 - General	1. Waste streams accepted at the site and subject to the treatment process will be capable of biological treatment.

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	2. The treatment process has been designed to treat the waste types included in the permit, this excludes waste codes subject to the repackaging activity within building 3. 3. The site implements waste pre-acceptance and waste acceptance procedudes for all waste streams, these have been detailed in previous tables and below. 4 All waste pre-acceptance and acceptance procedures will be detailed in the EMS. 5. All new waste streams will be assessed to ensure suitability at the site and the associated treatment process; waste streams will be periodically assessed. 6. The operator will obtain representative test data to fully characterise the waste and identify ant substance that it may contain. 7. The operator will not introduce waste into the process solely for dilution. 8. The site will implement waste tracking and auditing for all waste from receipt of waste, handling of waste onsite and offsite removal, this has been detailed in the previous tables and the following sections.
6.1 – Waste pre-acceptance and characterisation	1 & 2. All available information in respect of each waste stream including any chemical analysis (as applicable) will be reviewed in order to verify that waste is coded correctly as part of pre-acceptance procedures. Waste assessment comprising stringent pre-acceptance checks will be carried out on all routine loads upon collection and prior to them entering the site. This will include, but is not limited to, visual and olfactory checks of the load for any signs of contamination and/or non-conforming materials. If during the inspection there is evidence of visual or olfactory contamination that renders the load unsuitable for processing, the material

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	may be rejected. The customer may also be informed to dispose/recover the material at an alternative suitably licensed facility. Prior to acceptance, all loads will be reviewed and booked in on the electronic system or spreadsheet maintained by the Site Operator to ensure that the company has a general idea of the load composition and obtain details of the load i.e. physical properties and assigned European Waste Catalogue (EWC) code. When a customer query is received prior to acceptance, the operator will obtain the following: • the waste producer (i.e. site name address and contact details); • the source and nature of the waste, at the point of production; • a description of the waste including its physical form; • the full characteristics of the waste including the variability and reactivity (if relevant); • a description of any odour potential; • the type of packaging and risks of contamination; • an estimate of the quantity; and, • the age of the waste. The characterisation period will include samples of the loads to ensure the acceptable receipt at the site. The proposed regime will involve testing (but not limited to) the following: • hazardous substances; • heavy metals and toxic elements; • TPH; • organic matter; • moisture content; • protein; • carbohydrates; • total solids;

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	• volatile fatty acids; • ammonia; • pH and alkalinity; • nitrogen; and, • methane. Wastes are pre-booked prior to acceptance into the site enabling the operator to obtain all information regarding the source and nature of the waste as detailed previously in this section, this ensures that the operator will only allow permitted waste into the site, loads will also be subject to further waste acceptance checks prior to acceptance into the site. 3. During pre-acceptance the operator will consider how they will manage and control the nutrient balance of the waste feedstock, the moisture and any toxic compounds which may inhibit biological activity. 4. The site has established a list of waste that they can verify the pre-acceptance information by contacting the producer. 5. Pre-acceptance documentation will be retained for a period of 3 years following receipt of a load. The potential odours and emission risks will be reviewed and considered prior to acceptance to ensure that suitable handling and storage procedures are implemented at the site. 6. The operator will reassess the information required at pre-acceptance in the event of the following • if there are any changes to the waste, • process giving rise to the waste • waste received does not confirm to the pre-acceptance information

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	7. The roles and responsibilities of any administration/sales and technical staff will be separate. 8. The final check will make sure that: • the site accepts wastes which are suitable, • the site avoids overaccumulation of material, • there is sufficient storage and treatment capacity. When accepting a waste stream from a customer the operator will decide and record what parameters they will check at the acceptance stage. 9.The criteria for all non-conformances and rejected loads will be recorded. 10. The operator will ensure that the facility complies with all relevant regulatory requirements. 11. The operator will advise all customers that they must avoid contaminating wastes to prevent any handling difficulties that may inhibit the biological treatment process. 12. The operator will not unnecessarily transfer wate between waste facilities. 13. Representative samples or analysis will be taken on required waste streams; this may be as a result of the following: • 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). 14. Ther operator will make sure that feedstock testing and testing frequency reflects the nature of the material, how it arises and any potential variation within it.

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6.2 – Bespoke wastes	1. The operator will fully assess and manage any effects or inhibition on the biological treatment process and quality of the final waste or product; and the effects of any potential carry-over of residual chemical components into the outputs and on using the final outputs. 2. The operator and TCM will be trained to identify and determine if wastes are suitable for acceptance at the site. 3. Please refer to Table 1 for the pre-acceptance, waste acceptance and rejection procedure for non-hazardous waste streams. Wastes entering the site will be subject to a visual inspection. 4. Any mirror-entry codes will be classified in line with WM3 and the Chemical Waste: appropriate measures as detailed in Table 2. 5. See Table 2 for confirmation of how the site will comply with the guidance on Chemical Waste: appropriate measures.
6.3 – Waste acceptance and reception	1 -3. See 6.1 above. 4. Loads will be inspected upon entering the site using visual and olfactory checks to verify them against pre-acceptance information. 5. All transfer documentation will be reviewed and validated prior to waste acceptance. Any inconsistencies will be addressed with the customer and may result in the load being rejected. All non-conformances and rejected loads will be recorded. 6. All non-conformances and rejected loads will be recorded. 7.The criteria for all non-conformances and rejected loads will be recorded.

Appropriate Measure	Site Assessment
	8. The operator will have written procedures for recording, reporting and tracking non-conforming and rejected wastes, this includes the following: • 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 9. The operator will implement measures to prevent the recurrence of non-conforming and rejected wastes. Pre-acceptance and waste acceptance measures will be reviewed and revised in the event of rejected and non-conforming wastes. 10. All loads subject to the repackaging activity will be weighted on arrival, all liquid waste will arrive in tankers, and the weight/quantity will be determined by the size of the vehicle. The above will be checked against the accompanying paperwork and recorded on the database. The person carrying out the waste acceptance procedures will be trained to effectively identify and manage non-conformances to ensure operational compliance with the EP, this will form part of the introductory training with refresher training undertaken. 11. Pre-booking loads ensures that the site will have space and capacity to receive loads. 12. N/A – storm tanks not utilised at the site, the operation will no result in waste discharging directly into a watercourse. 13. The operator will verify waste accepted at the site is compliant as soon as possible i.e. during the waste acceptance checks once waste arrives at the site. 14. N/A – waste subject to the biological treatment activity will not be stored within bays.

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	15. The waste reception area for material that will be subject to the biological treatment activity will be situated within building 2. See response to 16 below regarding extraction system. 16 - 18. Buildings 1 & 2 and the treatment plant benefit from a dedicated abatement and extraction system. The extraction system has been designed to extract from a negative pressure environment. The site proposes to install the Nodour Hi-Flo 'twin bed' activated carbon system which is utilised in combination with an extraction fan and integral particulate pre-filter bed to protect carbon media. The extracted air will be collected via a duct system and routed to the main feed stock area and passes through a carbon adsorption unit prior to being discharged via the proposed stack. The extraction system ensure that the site will be operated under negative pressure to minimise the release of fugitive emissions. 19. The extraction system ensures that fugitive emissions are minimised. Waste subject to the treatment process will be discharged directly into the reception pit within building 2 which ensures that first-in. first-out principle is implemented at the site. 20. The reception pit within building 2 can be washed down, building 2 is sealed to prevent any wash-water from escaping the building. 21. N/A – no animal by-products accepted 22. The operator will characterise wash-down water, the operator will not typically use cleaning chemicals when washing out tankers or reception areas. 23. N/A – no outside reception areas. 24. N/A – waste subject to treatment process are discharged directly into plant and therefore not held prior to processing.

Appropriate Measure	Site Assessment
	25. Any non-conforming containers and wastes will be transferred to the quarantine area immediately. All non-conformances will be recorded. 26. N/A – at present pallets are not proposed to be used for containers. 27. Any non-conforming waste identified during a spot check will be dealt with immediately, the operator will review procedures and implement measures to prevent a recurrence, this may include refresher training or amending the pre-acceptance and wate acceptance procedures.
6.4 – Waste acceptance – AD Plants	N/A – the site will not be operating an AD plant.
6.5 – Waste acceptance - aerobic plants	The operators will characterise the feedstock to understand its effect on the biological treatment process. Upon first collection of a new waste stream, a sample will be taken and sent off for testing. Furthermore, an initial 12-month evaluation will be carried out by the operator to determine the composition of waste streams. The characterisation period will include samples of the loads to ensure the acceptable receipt at the site. The proposed regime will involve testing (but not limited to) the following: • hazardous substances; • heavy metals and toxic elements; • TPH; • organic matter; • moisture content; • protein; • carbohydrates; • total solids; • volatile fatty acids; • ammonia;

Appropriate Measure	Site Assessment
	• pH and alkalinity; • nitrogen; and, • methane.
6.6 – Waste acceptance – bespoke wastes	1. The operator understands what happens to the substances in the bespoke waste material when it undergoes biological treatment, the treatment plant has been purposely designed to handle all waste streams accepted at the site. 2. The operator will provide details of any pre-treatment or additional process control measures needed. 3. For each bespoke waste type accepted at the site, the operator will be able to fully describe or demonstrate the: • source and process that gives rise to the waste • characteristics, including chemical, physical and biological make-up of the waste • variability potential, considering source production methods • biodegradability rate or biogas potential • inhibition effects on the biological process • residual by-products • substances within the waste are biodegradable and recoverable under the conditions of the biological treatment process 4. Using the above points, the operator will implement a sampling and testing plan to demonstrate how the waste will be suitable for treatment. 5. The operator will undertake further measures if the waste is not within the suggested inhibition values, this may include rejection of the waste.
6.7 – 6.8 – Removing packaging and plastics / Acceptance of bulk loads, drums and IBCs	N/A – the biological treatment activity does not involve the removal of packaging and plastics.

Appropriate Measure	Site Assessment
	The biological treatment activity will not receive drums and IBC wastes. Loads will pre-booked and subject to the pre-acceptance and waste acceptance procedures detailed within the previous sections. Any sampling of waste will be undertaken in accordance with the following: • EN 14899 Characterization of waste – Sampling of waste materials – Framework for the preparation and application of a sampling plan • CEN/TR 15310 1 Characterization of waste – Waste Collection – Part 1: Guide on the selection and application of criteria for sampling under various conditions • CEN/TR 15310 2 Characterization of waste – Waste Collection – Part 2: Guide on sampling techniques • CEN/TR 15310 3 Characterization of waste – Waste Collection – Part 3: Guide on procedures for sub sampling in the field • CEN/TR 15310 4 Characterization of waste – Waste Collection – Part 4: Guide to the packaging procedures for storage, conservation, transportation and delivery of samples • CEN/TR 15310 5 Characterization of waste – Sampling of waste – Part 5: Guide on the process of developing a sampling plan Testing will be carried out by a UKAS approved laboratory in accordance with the parameters determined during pre-acceptance to ensure suitability at the site. A quarantine area is available at the site in the event that waste is rejected and requires temporary storage prior to offsite removal. The quarantine area will be 6m from any other storage area. The site surfacing comprises impermeable concrete and sealed drainage, the reception pit is located within building 2 which is a self-contained building to prevent any escape or spillage. The concrete surface allows for effective cleaning and is inspected as part of the daily inspections.
6.9 – Waste tracking	*Waste auditing and tracking*

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	1. A waste tracking system will be implemented on site which holds all information obtained during pre-acceptance, storage and treatment of loads. 2. The site will retain a catalogue of waste streams accepted at the site in line with those listed in the EP, this will ensure that all waste streams are characterised and can be subject to the periodic testing regime. The details and results of all loads accepted into the site along with testing will be recorded on an electronic spreadsheet. The tracking system will be cable of reporting the following: • quantity of waste present on site at any one time; • quantities of any waste pending on-site treatment or offsite removal; • breakdown of hazardous and non-hazardous waste quantities • where all waste is stored on site; and, • the time and date of waste acceptance to ensure it remains with the permitted time limits. As previously stated, records will be computerised and record on an electronic spreadsheet and kept up to date, the tracking system includes the following: • date and time of waste arrival; • details of the producer; • details of the previous holder (if applicable); • a unique reference number; • results of and pre-acceptance and waste acceptance analysis; • nature and quantity of waste; • intended disposal or recovery route; • waste storage location at the site; • where the waste is in the designated waste treatment route (for batch treatment); and, • decisions relating to pre-acceptance, waste acceptance, storage, treatment or rejection of waste.

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	It is important to note, that it is not feasible to audit each load accepted at the site, all routine loads will be audited and subject to the testing detailed previously, the loads will be subject to the visual and olfactory inspections prior to acceptance, the material will then be subject to quarterly sampling and testing as part of the ongoing testing regime detailed above. The above auditing and tracking of wastes ensure that sufficient knowledge is available with regards to what wastes have entered the site and are stored in a particular tank or treatment plant. 3. The operator will store backup copies of computerised records and ensure that they can be easily accessed in an emergency. 4. Acceptance records will be held for a minimum of 2 years after the waste has been treated or removed offsite, HWCN will be held for 5 years.
7 – Waste storage, segregation, transfer and handling	
7.0 – General	1. The facility has been designed to ensure that is enough physical and permitted capacity for wastes. 2. The operator will comply with limits set out in the Environmental Permit. 3. All storage areas will be located on impermeable surfacing with secondary containment in accordance with CIRIA C736. 4. The wider site is required to provide secondary containment which considers the industry standards detailed in CIRIA guidance C736 – Containment system for the prevention of pollution. The site will benefit from the construction of a concrete wall and/or kerbing around the perimeter of the site with a ramp at the site entrance to the yard which will create a sitewide containment area as detailed on the Site Layout Plan.

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	The drainage system benefits from a penstock (shut off) valve which will be initiated during a fire event or tank failure to ensure the external yard is sealed. Buildings 1 & 2 are separately bunded to ensure that firewater does not enter the buildings during a fire event. 5.All waste storage areas are within buildings or in external tanks which will separate rainwater from waste waters. 6. The site will implement waste storage and handling procedures to prevent and minimise the handling of waste and pollution risks. All staff are trained as part of introductory training to ensure that they can handle the waste. 7. The location of all storage areas has been chosen to ensure they are located away from any watercourses or other sensitive receptors. 8. The site is operational 24 hours a day Mon-Sat and benefits from CCTV, security gates and concrete walls to prevent unauthorised access and vandalism. 9. The EMS and OMP detail the maximum storage capacities for the site and associated storage areas. 10. The site will provide signage to clearly state the maximum quantity and types of waste stored in any designated area or tank. 11. Tanks subject to biological treatment will be marked with capacities. 12. The site will monitor the quantity of waste stored at the site; the site implements the waste tracking system to ensure that know how much waste is on site at any one time to ensure they do not exceed storage capacities. 13. N/A – no in vessel composting or AD.

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	14. Any potentially putrescible waste streams will be stored within tanks and/or within buildings with a suitable abatement/extraction system. 15. As wastes are pre-booked into the site, the operator can ensure that no further waste is accepted into the site until sufficient space is available, this will be reviewed to consider public holidays, adverse weather or seasonal peak volumes. 16. As above, waste is pre-booked so the operator can ensure that waste is not over accumulated at the site. 17. N/A – Any potentially putrescible waste streams will be stored within tanks – See point 14 above. 18. Waste streams are loaded into the treatment plant within building 2 and then stored in the relevant external storage tank, loads will only ever be introduced as either a hazardous or non-hazardous load and washed out between loads, the above ensures that there is no cross-contamination of waste streams. 19. Waste is loaded directly into the treatment plant within building 2 and subject to processing, this ensure that the first-in, first-out principle is implemented at the site. 20. The operator will make the on-site waste inventory readily available. 21. The site will always have safe pedestrian and vehicular access to storage areas and tanks. 22. Bays will be designed to prevent build-up in inaccessible areas i.e. corners, bays will be subject to regular cleaning in line with the operators housekeeping schedule.
7.1 – Above ground tank and bulk storage	1. All above ground storage tanks are situated on impermeable surfacing and benefit from secondary containment in accordance with CIRIA C736.

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	2. The site has a drainage plan which has been submitted as part of the permit application. 3. All tanks and associated equipment are suitably designed, constructed and maintained in accordance with manufacturer requirements. 4. The operator will carry out a risk assessment to validate the design and operation of storage systems. 5. The operator will make sure any new tanks and equipment are leakproof and working correctly before using them. 6. All storage tanks are enclosed; these tanks will be vented. 7 – 9. The wider site is required to provide secondary containment which considers the industry standards detailed in CIRIA guidance C736 – Containment system for the prevention of pollution. The site will benefit from the construction of a concrete wall and/or kerbing around the perimeter of the site with a ramp at the site entrance to the yard which will create a sitewide containment area as detailed on the Site Layout Plan. The drainage system benefits from a penstock (shut off) valve which will be initiated during a fire event or tank failure to ensure the external yard is sealed. Buildings 1 & 2 are separately bunded to ensure that firewater does not enter the buildings during a fire event. The above ensure that no spillage or contaminated water can escape off site. 10. See above, penstock (shut off) valve will be initiated during a fire event or tank failure to ensure the external yard is sealed. 11. N/A – see points above regarding containment.
7.2 – Submerged and underground tanks	1. All above ground storage tanks are situated on impermeable surfacing and benefit from secondary containment in accordance with CIRIA C736.

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	2. All tanks benefit from alarms to prevent over topping and leakage. 3. N/A – additional management listed in this section are not required on storage tanks.
7.3 – Lagoon storage	N/A – no lagoon storage on site.
7.4 – Storage in containers, IBCs and drums	Waste subject to biological treatment is not stored in containers, IBCs or drums, waste will be stored in tanks which benefit from ventilation and secondary containment. All tanks on site allow safe access for inspection. These will be monitored as part of daily site inspections checking for any leaks and/or spillages. Tanks will be clearly labelled. The storage tanks are purpose built for the activity to ensure that they are fit for purpose. The remaining element within this section are not considered relevant to the proposed operation or have been addressed elsewhere within the appropriate measures assessment.
7.5 – Transfer of waste into and from sealed tankers and containers	1. The transfer of waste from a tanker will be undertaken within building 2 where the load will be discharged into the reception pit. 2. Transfers from tankers will be carried out by suitably trained staff who are trained on how to complete checks and transfers. 3. Operatives will supervise all loading and unloading activities. 4. Staff will always be present at the site to prevent 'tanker drive off'. 5. Pipework and connections points will be fit for purpose and have been designed specifically for the proposed process. The installation of pipework and couplings will be

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	carried out by a competent company or individual. All couplings will be maintained and cleaned in line with manufacturer requirements. 6. Transfers will only take place after pre-acceptance and waste acceptance checks have been undertaken by a suitably trained member of staff. The operator will record the following: • which batch or load of material is for transfer • the receiving storage vessel or area • the equipment required, including spillage control and recovery equipment • any special provisions relevant to that batch or load, including minimising fugitive emissions 7. As wastes are pre-booked into the site, the operator can ensure that no further waste is accepted into the site until sufficient space or capacity is available. Operatives will supervise all loading and unloading activities, as material is discharged into the reception pit, it is unlikely that it would ever result in the overfilling of tanks. Tanks are alarmed to prevent any overfilling which prevents any overflows 8. Any transfers to and from tankers only take place after the relevant verification and testing has been undertaken. 10. Routine maintenance will be carried out in accordance with manufacturer requirements on all tanks, pipework, pumps, seals etc. 11. The wider site is required to provide secondary containment which considers the industry standards detailed in CIRIA guidance C736 – Containment system for the prevention of pollution. The site will benefit from the construction of a concrete wall and/or kerbing around the perimeter of the site with a ramp at the site entrance to the yard which will create a sitewide containment area as detailed on the Site Layout Plan. The drainage system benefits from a penstock (shut off) valve which will be initiated during a fire event or tank failure to ensure the external yard is sealed. Buildings 1 & 2

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	are separately bunded to ensure that firewater does not enter the buildings during a fire event. The above ensure that no spillage or contaminated water can escape off site. 12. N/A – site is not an AD or TAD facility. 13. If required, procedures will be in place to make sure that wastes due to be transferred comply with the carriage of dangerous goods. 14. Transfers into and from tankers only take place in bunded areas designed to contain a worst-case spillage i.e. building 2. The operator has a spillage procedure in place to contain any spillages. The operator will record any spillages that occur at the site. 15. N/A - Rotary-type pumps not used. 16. Sludges will be pumped, not poured.
7.6 – Drainage	1. Drainage will be inspected as a part of the daily site inspections to identify any blockages. 2. Any debris identified will be removed and cleaned to prevent odour, pest infestations and maximise drainage. 3. There are no leachate or liquors requiring offsite transfer for further treatment.
7.7 – Tank inspection and maintenance	1. All storage tank levels will be monitored. 2. Storage tanks will benefit from a suitable freeboard as recommended by the plant manufacturer. 3. Tanks will be fitted with automated level monitoring system which will protect against overfilling and will be regularly maintained.

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	4. Inspection of tanks, pipework and fittings will be carried out by a suitably competent person. 5. If any issues are identified during inspections, repair works will be actioned to ensure tanks are fit for service prior to any further storage within that specific tank. 6. The site has been designed to ensure the safe and efficient loading, unloading and storage of waste. 7. Hazardous waste stream will be stored within enclosed storage tanks. 8. All pipes, connections, couplings and transfer lines will be resistant to the permitted waste stream ensuring that they are fit for purpose. 9. The site will use a suitable pipework coding system. 10. The site will monitor the transfer of all waste streams between tanks. 11. All loading and unloading operations are supervised by operational site staff. 12. Site management will undertake regular visual inspections of storage tanks in between batch operations. Each tank is fitted with an access hatch to allow for inspection. However, yearly non-destructive testing will also be undertaken by a third party. 13. Tanks will be washed out between hazardous and non-hazardous loads. The site will implement a schedule for the removal of grit and sediment from the bottom of storage tanks; the plant has been designed to separate out grits from liquids at the reception stage.
8 – Waste treatment	
8.0 – General	1. As wastes are pre-booked into the site, the operator can ensure that no further waste is accepted into the site until sufficient space or capacity is available.

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	2. All stages of the treatment process will be managed to ensure the process is stable to minimise the risk of: • over-heating • re-heating • foaming • uncontrolled biological activity • leachate breakout 3. The operator will monitor and optimise the waste treatment process to make sure that they can treat waste effectively and efficiently and ensure that the treated output is suitable for its intended use. 4. The operator has identified all risks and characterised all emissions from the process, they have taken appropriate measures to control them at source or abate them, these have been discussed throughout the application. 5.The operator will maintain up-to-date written details of the onsite treatment activities and process controls. 6. The operator will not use material flow analysis to identify potential contaminants in waste inputs, outputs and emissions. 7. The operator will identify any potential contaminants to make sure that they can be minimised, removed and recovered from the process. 8. The operator will not knowingly dilute undesired materials into the recycling or product cycle. 9. The operator will not proceed with treatment if the material flow analysis indicates losses from a process that may cause:

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	• a breach of an Environmental Quality Standard or your permit • a breach of a benchmark • a significant environmental impact • an issue in using the end material beneficially 10.The operator will clearly define the objectives and reaction steps for each treatment process. 11. The operator will define the suitable inputs to the process. The treatment plant has been designed to consider any likely variables expected within the waste streams. 12. The operator will sample and analyse the waste throughout the process to check that it has reached an adequate end point. 13. The operator will manage the pre-treatment of waste and biological treatment activities in a way that minimises the risk of pollution from: • odour • bioaerosols • dusts • other emissions The operator has prepared the relevant management plans to control and abate any potential emissions generated as a result of onsite activities. 14. The treatment plant has been designed and selected so that it is located within a building to contain any fugitive emissions.
8.1 – Abnormal operation conditions	1. The operator will assess the likelihood of abnormal operating conditions to ensure that they can 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

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	• start up • unplanned stoppages and breakdowns • shutdown Contingency measures for the above are discussed throughout the permit application documentation i.e. EMS.
8.2 – Pre-treatment	N/A – no dedicated pre-treatment is undertaken for material that is subject to the biological treatment activity, wastes will be loaded into the reception pit within Building 2 and subject to the treatment process.
8.3 – Process monitoring systems	1 & 2. Process monitoring systems will be installed and operated at the site, these systems will be subject to calibration and maintained in line with manufacturer requirements.
8.4 – Mechanical treatment	N/A – the site does not undertake any of the activities detailed within this section, the biological treatment is a process within the treatment line and not a dedicated mechanical biological treatment plant, it is therefore considered segregation before biological treatment is required.
8.5 – Aerobic treatment and process control	Aerobic treatment is a small step within a wider physico-chemical process of the wet waste treatment plant. It is therefore not considered that this section is relevant to the operations undertaken.
8.6 – Open air composting	N/A – open air composting is not undertaken at the site.
8.7 – In vessel and enclosed systems aerobic processes	N/A – the site will not be operating an AD plant.
8.8 – Mechanical and biological treatment and mechanical heat treatment	N/A – the site will not be undertaking mechanical heat treatment. The tanks used for the biological treatment benefit from a dedicated abatement system.
8.9 – AD and TAD plants	N/A – the site will not be operating an AD plant.
8.10 – Biogas production and management – AD Plants	N/A – the site will not be operating an AD plant.
8.11 – Pressure and vacuum relief control – AD and TAD plants	N/A – the site will not be operating an AD plant.
8.12 – Biogas treatment and storage – AD plants	N/A – the site will not be operating an AD plant.
9 – Outputs	

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9.1 – Record keeping for treatment outputs and residues	1. The operator will maintain a waste tacking system which records treatment of waste, outputs produced and their weight and treatment residues and their weight. 2. The operator will maintain records of recovered non-waste materials leaving the site including type of material, export date, tonnage etc.
9.2 – Outputs from aerobic process – compost	N/A – the site will not be composting
9.3 – MBT and MHT outputs	N/A – the site is not likely to be generating waste outputs from the biological process within the treatment plant.
9.4 – Outputs from anaerobic processes – digestate	N/A – the site will not be accepting digestate.
10 – The Control of Major Accident Hazard Regulations 2015 (COMAH)	
10 – General	N/A - The site is not exceeding threshold for dangerous substances at which COMAH regulations will apply.
11 – Emissions control	
11 – General	1. The site has reviewed activities and identified opportunities to contain, treat and abate emissions from the process. 2. Abatement has been designed by a suitable engineer and will be constructed by a qualified contractor. 3. All plant and equipment is tested, operated and maintained in accordance with manufacturer requirements. 4. The site has considered the mandatory AEL when designing and commissioning the plant and associated abatement.
11.1 – Emissions inventory	1. The site will identify, characterise and control all emissions. 2. The emissions inventory includes information about relevant characteristics of any relevant emission to air or sewer.
11.2 – Emissions and monitoring limits	1. The site will monitor all emissions to comply with the requirements of the Environmental Permit.

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	2. An Emissions Modelling Assessment has been submitted with the permit application. This assessment includes information of point source emissions to air. It has been concluded that "No significant impacts are predicted on long term and short term AQLVs/EALS at any receptor locations and no exceedances of relevant AQLVs and EALs are predicted at any relevant locations of exposure. Emission limits will be set as part of the permit determination and in accordance with BAT. Monitoring of water based wastes will be undertaken at various points through the process. This will be undertaken at the point of discharge to sewer, to demonstrate compliance with limits within the Trade Effluent Consent, but also at other points within the process. A trade effluent consent issued by Southern Water is in place at the site to control discharges to sewer. The H1 Risk Assessment for discharge to sewer has considered all compounds which the operator anticipates may be discharged. The concentrations assigned in the H1 Risk Assessment are based on BAT based limits and/or design criteria advised by the operator for the system.
11.3 – Meteorological conditions	1. The site will monitor and record meteorological conditions as part of daily inspections using the Beaufort scale. 2 & 3. Weather monitoring station is not required due to the enclosed nature of treatment operations and dedicated abatement system which has its own limits and monitoring requirements.
11.4 – Bioaerosols	N/A – no bioaerosols released from the process due to the presence of the abatement system and associated filters and the nature of the activity (I,e, enclosed wet waste process).

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11.5 – Emissions of odour	1. An Odour Management Plan (OMP) has been produced as part of the application to ensure that all potential odour sources are identified and controlled. The OMP has been produced in accordance with the H4 Odour Management guidance. 2. The OMP his includes routine dynamic olfactory monitoring and sniff testing. Routine dynamic olfactory monitoring • The Odour Control Unit (OCU) has been designed to efficiently destruct potential odourous compounds. There is no BAT based odour emission limits for the treatment of water based liquid wastes. However, the EU BAT Conclusions Document for Waste Treatment contains a BAT based odour limit for treatment of biological waste, of between 200 and 1,000 Odour Units (OU).m-3. It is anticipated that the upper end of this range will be achieved as a worst-case residual odour concentration from the OCU. • Sampling using dynamic olfactometry according to EN 13725 will be undertaken every 3 months to establish residual odour concentrations arising from the stack serving the OCU and include assessment against the above criteria. Should all monitored odour concentrations be below 1,000OU.m-3 during the first 12 months of operations, monitoring would then be reduced to a period frequency of every 6 months. • Stack sampling will be undertaken to collect an air sample, in accordance with the EA Stack Emissions Monitoring Method Implementation Document for EN 13725. The stack has a sample port which has been designed in accordance with EA M1 Guidance. During each periodic test, bag samples of air will be collected from the stack and this subsequently exported from site for assessment of odour concentration in accordance with EN13725 and associated EA guidance. Stack sampling and post sampling assessment will be undertaken by a suitably accredited contractor. • In the event that the residual Odour Concentration exceeds 1,000 OU.m-3 from a routine periodic test, the operator will undertake immediate investigative action to

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	identify the fault, take remedial action as necessary and then commission a further test to verify that the fault has been rectified. • Records of all sampling and any remedial action taken will be logged in the Site Diary and be available for inspection by the EA. Olfactory monitoring at site boundary (Sniff testing) • In addition to the routine dynamic olfactory monitoring, odour will be monitored using sniff testing at the site boundary on a daily frequency and if there is a spillage of potentially odorous material, if an odour is detected on-site or in the event of odour complaint arising. During monitoring, the site supervisor, or designated, trained staff member, will monitor odour around the entire site perimeter and an Odour Diary will be completed. • The results of monitoring exercises and any remedial action taken will be entered into the log book which will be available for the EA to inspect upon request. The name of the site supervisor/odour assessor will be stated in the site's diary along with notes on weather including precipitation, temperature, wind speed and direction (from Met Office information). • Should the monitoring conclude that a certain activity/waste is giving rise to odour which is migrating offsite, steps will be taken to reduce the impact of this activity, which may include, but is not limited to; removal offsite to a suitably licensed facility, faster processing/lower storage rates, pumping and removal of standing surface water etc. • The site supervisor/odour assessor will be suitably trained to carry out these duties. • Prior to carrying out a routine odour check, the relevant member of staff will vacate the site for a period of 30 minutes and then carry out the assessment on their return to ensure they are not desensitised to the odour. 3. The OMP will be reviewed regularly as part of the Environmental Management System review and include actions and timescales to address issues, procedures for

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	odour monitoring, procedures for responding to incidents and odour prevention measures.
11.6 – Point source emissions to air	1. The treatment plant benefits from a dedicated abatement and extraction system. The extraction system has been designed to extract from a negative pressure environment. The site proposes to install the Nodour Hi-Flo 'twin bed' activated carbon system which is utilised in combination with an extraction fan and integral particulate pre-filter bed to protect carbon media. The extracted air will be collected via a duct system and routed to the main feed stock area and passes through a carbon adsorption unit prior to being discharged via the proposed stack. 2. The fate and impact of substances emitted to air will be assessed following the EAs air emissions risk assessment methodology. 3. The dedicated abatement/extraction system will be monitored and maintained in accordance with manufacturer requirements to ensure that it is effective in treating odours and other emissions. 4. The site will observe trends and changes and carry out maintenance or replacement where needed. 5. The EMS details procedures for dealing with plant and equipment breakdown and operational failure this includes procedures for breakdowns which may result in the loss in abatement efficiency. 6. Once a year the site will carry out an efficiency assessment of the abatement/extraction system. 7 – 18. The site will not be using a biofilter. 19 – 21. The site will be using pre-treatment abatement scrubbers

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	22. The activated carbon filter will be monitored for the parameters detailed within the measures. 23. Carbon will be replaced or regenerated before saturation. 24. The site will ensure that concentrations of VOCs are below their low explosive limit. 25. The site will follow manufacturers recommended maximum operating temperature. 26. A cooling system will be used where required. 27. Particulates will be minimised before they reach the carbon filters. 28. The site will not allow exothermic reactions when maintaining carbon filters. 29. Activated carbon will not be stored at the site. 30. Stacks and vents will release at an appropriate height, temperature and velocity determined during the emissions modelling to make sure that emissions disperse well and do not impact on sensitive receptors. 31. Stacks and vents will benefit from suitable monitoring points with safe access. 32. Emissions will be monitored in accordance with EA guidance on monitoring stack emissions.
11.7 – Masking agents, chemical neutralising agents and topical barriers	1. The site will use chemical neutralising agents within the process to aid in the reduction of odorous compounds. 2. N/A - No compost or digestate processed at the site.

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	3. N/A – Masking agents not used at the site. 4. N/A – topical barriers not used at the site. 5. Water-efficiency measures have been reviewed when considering the use of neutralising agents.
11.8 – Fugitive (diffuse) emissions to air	1. Appropriate measures have been used where applicable to prevent emissions of odour. Dust, bioaerosols and particulates, mud and litter are not considered to be generated as a result of onsite operations. 2. The site has been designed so that any wet waste accepted into the site is situated within Building 2 that benefits from the abatement/extraction system. 3. The site will use suitable components in the design and construction of plant and equipment. 4. All plant and equipment is subject to maintenance in accordance with manufacturer requirements. 5. The frequency of maintenance varies for each item of plant and equipment and will be determined by manufacturer recommendations. 6. The site undertakes pre-acceptance checks, waste acceptance checks and daily site inspections to identify and manage all waste streams accepted into the facility that could cause fugitive emissions to air. 7. It is not likely that waste streams accepted would cause fugitive emissions to air due to the predominantly enclosed nature of operations and dedicated abatement/extraction systems used. If any wastes are identified the site will take appropriate risk-assessed measure to control the emission.

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	8. The site will store, handle and process waste streams within a building that benefits from dedicated abatement/extraction. 9. The site will review the integrity and containment effectiveness of buildings, extraction systems and secondary containment during commissioning, these will be reviewed periodically in accordance with manufacturer recommendations. 10. All assessments with regards to fugitive emissions with be carried out the recognised standards and guidance. 11. Any building, tank or plant & equipment damage or breakdown will be replaced or repaired as soon as practicably possible; this will be dependent on the availability of a suitably licensed contractor. 12. In the event that a tank/vessel is compromised it will be contained via secondary containment, the tank/vessel will not be used until the required repair or replacement works have been carried out. 13. The site will implement a housekeeping schedule (inclusive of frequencies) to regularly inspect and clean all waste storage & treatment areas, plant and equipment. 14. The site will use suitable construction materials that reduce corrosion; pipework, plant and equipment will be regularly inspected and maintained. 15. N/A – no fugitive dust emissions likely to be generated as a result of onsite operations. 16. Litter is not considered to be generated as a result of onsite activities. Daily inspections will involve checking for any litter which will be placed into the relevant trade bin for offsite removal.

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	17. N/A – not outdoor processing undertaken.
11.9 – Leak detection and repair	N/A – The site is not a dedicated AD, MBT or TAD facility, biological treatment is a smaller element that forms part of the larger wet waste treatment process.
11.10 – zPests	Due to the nature of waste accepted and the manner in which they are handled i.e. within containers or loaded into enclosed plant, pests and vermin are unlikely to pose an issue, the EMS will outline measures with regards to pest control.
11.11 – Emissions of noise and vibration	1. Treatment operations are undertaken within building 1 and 2 which will control potential noise release from operations. 2. The site will implement measures to control noise such as: • operating within buildings. • designing the site so that buildings face inwards to the centre of the site and away from receptors. • Maintain plant and equipment in accordance with manufacturer requirements. • Training for all staff on best practicable measure for noise control 3. The site will operate a standalone noise and vibration management plan.
11.12 – Point source emissions to land and water (including indirect discharge to sewer)	1. The operator will have a trade effluent consent in place. 2. The operator will be treating waste water within the plant to reduce emissions to water. 3. The operator will assess any substances emitted to sewer following the EAs risk assessment guidance. 4. The discharge to sewer will comply with the conditions of a trade effluent consent. 5. Any waste water will have been treated as part of the wet waste treatment process prior to any discharge. 6. Any wash waters will be directed into the treatment plan to ensure treatment prior to any future reuse or discharge.

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11.13 – Fugitive emissions to land and water	1. The site will use relevant appropriate measures to control potential fugitive emissions to land and water. 2. The site will benefit from an impermeable surface, secondary containment, sealed construction and a contained drainage system. 3. All processes are undertaken within buildings excluding external tanks which benefit from their own secondary containment to ensure that any process water and surface water are separated. 4. See above. 5. The site benefits from a suitable drainage system to collect surface water. No areas of the site where waste is treated will 6. The site will not be undertaking washing and cleaning activities. 7. N/A – Any tankers will be washed out in the reception pit located within building 2. 8. N/A – see above 9. N/A – see above 10. No oils or fuels are used as part of the biological treatment, any maintenance oils used for plant maintenance will be stored within building 1 to prevent pollution. 11. The EMS outlines the spillage procedure implemented at the site to minimise the risk of an accidental spill, the procedure is in place to ensure that no spill can enter watercourses, sewer or contaminate land.

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	12. All staff are subject to induction training and refresher training which will cover procedures on managing a spill. 13. The site will have spill kits situated throughout the facility, as stated above all staff receive training on the spillage procedures for the site. 14. The spillage procedure is in place to ensure that no spill can enter watercourses, sewer or contaminate land, this will involve the use of spill kits and booms to contain any spillages. 15. The spillage and response procedures within the EMS detail how the site will handle and dispose of any residues produced form a spillage. 16. The site has been designed to minimise reliance on subsurface infrastructure, with the only subsurface features comprising drains and the interceptor. All primary process plant, including tanks, vessels and associated pipework, is located above ground, enabling routine visual inspection and rapid identification of any leaks or defects. Routes of all drainage systems have been established and are recorded within site drainage plans, including the location of interceptors and any associated sumps. All hazardous materials, stored wastes and process liquids are handled within above-ground infrastructure provided with secondary containment, designed in accordance with the accompanying CIRIA (C736) report, ensuring that any leaks or spills are contained and do not enter the subsurface environment. A programme of inspection and maintenance is implemented for the drainage system and interceptors, including periodic inspection, cleaning and, where necessary, CCTV surveys.

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	17. The site has been designed, considering surfacing type, permeability, thickness and falls (of the land), drainage, containment measures, inspection and maintenance. 18. Site inspections are undertaken to monitor and inspect the integrity of surfaces, containment and buildings. All plant and equipment are subject to maintenance in accordance with manufacturer requirements.
12 – Process efficiency	
12.1 – Energy efficiency	1. Energy efficiency will be implemented in accordance with BAT 23, refer to standalone BAT assessment. 2. Energy efficiency and use will be monitored regularly, and the operator will review and record measures for improving energy efficiency on an annual basis and take any action deemed necessary by the review. A breakdown of energy consumption by type of source will be included as part of the review. 3. All mobile and stationary plant and equipment utilised at the site will be subject to regular maintenance to optimise operating efficiency. A record of fuel consumption will be maintained and will be used to identify any abnormal fuel consumption that requires investigation. All staff will receive appropriate training for operations at the site, which will include maintenance procedures and basic housekeeping (e.g. switching lights and equipment off when not in use). Low energy lighting systems will be used within the building. 4. The site will implement techniques to avoid gross energy inefficiencies i.e. containment methods for buildings. 5. The operator will regularly review and update energy balance as part of the facility's management systems.
12.2 – Raw materials	1. The operator will keep a list of raw materials used at the site.

Appropriate Measure	Site Assessment
	There are several secondary raw materials utilised as part of the treatment process. The consumption of secondary raw materials will be monitored. Chemicals and polymers will be utilised as part of the water treatment process and will be stored in designated storage areas in suitable cabinets. Where relevant, all substances are assessed for COSHH (Control of Substances Hazardous to Health) compliance, the site will retain Material Safety Data Sheets (MSDS) for all materials handled and stored on site. Whilst the release of any substances is considered negligible, it is important to note that the facility will benefit from containment in line with CIRIA C736 which controls and prevents the release of any substances. 2. The operator will regularly check to see if they can use raw materials new to the market that have less environmental impact. 3 & 4. To ensure the appropriate use of raw materials and prevent release of any substances, Elliot Environmental Drainage Limited will follow quality assurance procedures when procuring materials and use specialist suppliers. When selecting raw materials priority will always be given to those with the least environmental impacts compared to any alternatives (where practical). A full list of the raw materials required to operate the permitted activities are detailed in the accompanying application documents.
12.3 – Water use	1. The operator will optimise water use to reduce the volume of waste water generator. Water is required for the operation of the wet waste treatment plant. 2. As part of the treatment process, water will be treated to enable recirculation within the plant, only once the water is not suitable for recirculation will it be discharged to

Appropriate Measure	Site Assessment
	sewer under a trade effluent agreement. The above ensures that water consumption is minimised by treating and recirculating water. 3. The operator will review water use at least every 4 years. 4. The operator has produced flow diagrams for the operation detailing the water use throughout the treatment plant. 5. As detailed above, the operator will be recirculation water within the treatment process to reduce emission to water. Only once the water is not suitable for reuse into the plant will it be discharged to sewer. 6. The operator will establish the water quality requirements for each activity and identify whether they can substitute water from recycled sources. Treated water will be recirculated back into the process. 7. Treated water for reuse will be kept in a separate tank prior to recirculation into the plant. 8. The operator will record fresh water use.
12.4 – Waste minimisation, recovery and disposal	1. The site implements a standalone RMP which has been produced to ensure the following: • generation of residues from waste treatment is minimised; • optimises the reuse, regeneration and recycling of residues; • waste and material not suitable for reuse, regeneration or recycling is adequately disposed of. 2. Where any waste is disposed of, detailed assessment will be undertaken to identify the best options for waste disposal.

Appropriate Measure	Site Assessment
	3. The RMP will be reviewed in the event that treatment activities change or if the site utilises any new raw materials as part of the operation
13 – Bespoke waste assessment	
13.1 – Inhibition values for aerobic and anaerobic processes	The site will accept waste that is suitable for biological treatment within the process.

Appendix I

Site Drawings and Process Flows