

# Notice of request for more information

## The Environmental Permitting (England & Wales) Regulations 2016

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The Director or Company Secretary  
Elliott Environmental Drainage Limited  
Unit 1  
St Michaels Close  
Aylesford  
Kent  
ME20 7BU

Application number: EPR/ZP3623LZ/A001

The Environment Agency, in exercise of its powers under paragraph 4 of Part 1 of Schedule 5 of the above Regulations, requires you to provide the information detailed in the attached schedule. The information is required in order to determine your application for a permit duly made on 07/10/2024.

Send the information to either the email or postal address below by 25/09/2025. If we do not receive this information by the date specified then we may treat your application as having been withdrawn or it may be refused. If this happens you may lose your application fee.

Email address: [tommy.wager@environment-agency.gov.uk](mailto:tommy.wager@environment-agency.gov.uk).

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Name	Date
Tommy Wager	14/08/2025

Authorised on behalf of the Environment Agency

## Notes

These notes do not form part of this notice.

We will recover our costs where we have to send three or more information notices about the same issue. For details of the fixed cost see our [charging guidance](#) or [charging scheme](#). This is the first notice on the issues covered in this notice.

As part of this notice we are requesting information that may lead to extra charges being applied to support this application. This will be determined upon assessment of the Schedule 5 Notice response documents and will be communicated to you as necessary within further correspondence and/or requests for further information/schedule 5 notices.

The notes in italics that appear after information requests in the attached schedule do not form part of the notice. The notes are intended to assist you in providing a full response.

## Fire Prevention Plan

You must consider the 'Fire Prevention Plans: environmental permits' guidance (updated 11/01/2021) [GOV.UK](#), hereafter referred to as the guidance, and come to your own view as to what proposals you consider will meet the objectives to:

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

You can follow the measures set out in the guidance and if you do so you will meet the objectives of the guidance and we are likely to approve your Fire Prevention Plan (FPP). If you do not include these measures you can propose alternative measures to meet the objectives. We will technically assess your alternative measures and, if we are satisfied that they meet the objectives, we can approve the FPP.

If your proposals do not meet the measures in the guidance, you should explain in detail the alternative measures you intend to take and how those measures can meet the objectives. This applies to each of the information requests in the attached schedule.

## Schedule

### Section 1 – Best Available Techniques (BAT)

The Best Available Techniques (BAT) Reference Document for Waste Treatment provides standards to which facilities should comply with. In line with this guidance we require responses to the following questions:

1. **Provide a revised version of the BAT assessment document that addresses the following aspects:**
  - a. **It must be a standalone document that does not reference other documents for further information such as the EMS.**
  - b. **It must be fully comprehensive in scope ensuring each relevant BAT point (both number and letter, e.g. BAT '14d') has been demonstrated or addressed clearly and in detail.**
  - c. **Demonstration of how BAT will be met rather than just stating that BAT will be achieved (e.i demonstration through onsite processes, details of policy, abatement techniques etc).**
  - d. **Where a BAT conclusion has not been fully demonstrated, a clear justification outlining the reason for the deviation must be provided.**

#### **Reason for Question**

*On assessment of the BAT assessment document (Appendix X, pages 245-256 of the permit application supporting document) we can see you have only attempted to address the wider BAT conclusions rather than providing full details to demonstrate compliance with each individual point. Regarding the points you have addressed, they often reference other documents for more details, however A BAT assessment should be completed as a standalone document, without fully referencing others. It is ok to demonstrate compliance with BAT point 1 by stating we have an EMS as it has been included in the application, however it is not adequate to make statements such as "The EMS for the operation contains procedures and measures which demonstrate compliance with BAT 2" to address BAT 2b. We require a lot more information relating to each relevant point (number and letter) to assess whether the onsite operations fully demonstrate BAT adherence. Failure to do so adequately could result in the application being refused. In the case that a BAT conclusion is not being fully demonstrated you should provide full details justifying why the operator has chosen not to comply.*

2. **Provide a process flow diagram and revised non-technical summary to demonstrate the step-by-step onsite operations ensuring it includes the following aspects:**
  - a. **All tanks and assets that are used for storage and/or treatment (with specification of max storage time and/or type of treatment undertaken).**
  - b. **All waste and raw material input points (reception assets, flocculant input chamber etc).**
  - c. **All waste output points (with specification of whether they are disposal and/or recovery outputs).**
  - d. **All emission points for waste gases and wastewater/effluent (both air and water).**
  - e. **Missing processes alluded to in other supporting documents such as oil separation.**

#### **Reason for Question**

*You have not included a process flow diagram in your application, and we cannot gather enough information from your non-technical summary (due to a lack of detail) and the site layout plan alone to fully assess the activities you are proposing. We need you to fully demonstrate each individual stage of the process the waste is taken through from reception to onwards transfer/disposal. We need this same level information for movement of waste gases/waste water and their emission points in order to fully assess the operations are compliant with BAT. There are currently several unknowns within the process, such as how wastes are transferred from building 2 into the external storage area, or how full segregation of non-haz and hazardous*

waste is achieved beyond the reception pit. A process flow diagram will form a vital cross-referencing tool for us to be able to understand how the site operates. We have also noticed that not all processes have been included in the non-technical summary such as the oil separation process detailed in the OMP (section 3.4.1 for repackaging).

3. **Provide a revised site layout plan that includes a sampling point and the sampling chamber for the waste water/effluent prior to discharge via the sewer.**
4. **Provide a revised location plan that includes the emission to air (A1) from the LEV, the sampling point identified above and the emission to sewer.**
5. **Provide a national grid reference for emission points specified above.**
6. **Revise any relevant documents such as the BAT assessment document (BAT 3, 6, 7 and 20) and any other supporting information that makes reference to or details pertinent information relating to the waste water leaving the site via the emission to sewer to maintain consistency across the documents.**

#### **Reason for Question**

*On assessment of the application we can see you have not included a sampling point for the effluent prior to discharge via sewer. As this is an indirect emission to water you will need to identify a sampling location as well as the location where it leaves the site boundary (emission to sewer). We have asked you to include all three elements (sampling point, emission point to air and emission point to sewer) on the site location plan as well due to this plan being identified as the plan that will be drafted into the permit in order for it to be cross referenced with the monitoring tables. The site layout plan is likely to be 'too busy' to be drafted into the permit, however this plan still serves as a vital cross-referencing tool and so should be updated as well. We also request your diligence in ensuring the consistency of other supporting documents that may make reference to the wastewater/effluent emissions by keeping them up to date.*

7. **Provide a copy of your residue management plan.**

#### **Reason for Question**

*Under the BREF guidance section 2.3.12 a 'residue' is identified as the solid waste generated by the waste treatment activity. Under BAT 1 a set of measures should be undertaken with the following aims:*

- a) *Minimise the generation of residues arising from the treatment of waste,*
- b) *Optimise the reuse, regeneration, recycling and/or recovery of energy of the residues, and*
- c) *Ensure the proper disposal of residues.*

*On assessment of your application, we cannot find any clear identification of residues produced as part of the process i.e. odour control unit medium or see any evidence of how these have been assessed in line with BAT requirements.*

8. **Provide a waste pre-acceptance procedure that explains how you will collect information about the waste input and characterisation to achieve sufficient knowledge of the waste composition.**

#### **Reason for Question**

*Under BREF guidance BAT conclusion 2 you must set up and implement waste characterisation and pre-acceptance procedures. In your application BAT assessment document, you have confirmed in regards to BAT 2 that "the EMS contains measures and procedures that demonstrates compliance with BAT 2", however the EMS only states "The site will use Best Available Techniques (BAT) for the recovery/disposal of waste in accordance with Commission Implementing Decision (EU) 2018/1147". This does not provide adequate information or demonstrate operator specific policy regarding the pre-acceptance procedures to*

collect information about the waste input and how it may include waste sampling and characterisation to achieve sufficient knowledge of the waste composition.

As previously mentioned, whilst any revised information submitted in response to this question may be made available in the EMS, we are specifically asking for this to be provided as part of the BAT assessment document without referring to any documents for further information.

**9. Provide a waste acceptance procedure that addresses the following:**

- a. An explanation of what specific parameters will be checked for waste received.**
- b. An explanation of your criteria for non-conformance and/or rejection.**
- c. Provide your rejection procedure.**
- d. Provide your procedure for periodic auditing of waste received.**
- e. Provide your procedure for logging of audits results and wastes not audited.**

**Reason for Question**

Under BREF guidance BAT conclusion 2 you must set up and implement waste characterisation and acceptance procedures. In your application BAT assessment document you have mentioned, duty of care notes, visual checks and identification of problematic loads, however the detail and criteria for such checks and for what is consider a 'problem' load has not been specified. This does not provide adequate information regarding the acceptance checks including a policy for rejecting non-conforming wastes and a waste tracking system. You will need to detail the checks themselves along with the parameters for these checks including periodic auditing of wastes. This should include an understanding of characteristics such as, but not limited to hazardous substances and elements, particle size distribution and physical contaminants, total solids and volatile solids, biochemical methane potential, total organic carbon (TOC), nutrient analysis, calorific value, fibre content, pH and alkalinity, volatile fatty acids (VFA), ammonia and total nitrogen content - carbon to nitrogen (C to N) ratio, heavy metals and potentially toxic elements (PTEs) and carbohydrates and lipids which cannot be established from visual checks alone. On assessment of section 2.2.2.2 of the main supporting document, you have confirmed that a 'positive' test result will result in acceptance of waste while a 'negative' test result will result in rejection, whilst this indicates the site may undertake periodic sampling, it provides zero context as what constitutes a negative or positive test outcome as we have not been provided a criteria that is tested for or thresholds for what would be acceptable against such a criteria.

As previously mentioned, whilst any revised information submitted in response to this question may be made available in the EMS, we are specifically asking for this to be provided as part of the BAT assessment document without referring to any documents for further information.

**10. Provide an inventory of wastewater and waste gas streams in line with BAT Conclusion 3. This must include:**

- a. Identification of the characteristics of the emission.**
- b. Controls in place to stop pollution.**
- c. The substance concentration and load value.**
- d. The variability of each wastewater and waste gas stream.**

**Reason for Question**

Under BREF guidance BAT conclusion 3 you must establish and maintain an inventory of waste water and waste gas streams, as part of the environmental management system. This should include information about the characteristics of the waste to be treated and the waste treatment processes, including simplified process flow sheets that show the origin of the emissions, descriptions of process-integrated techniques and waste water/waste gas treatment at source including their performances. On assessment of the BAT assessment document you have advised the EMS covers this information, however on looking into the EMS, we can only see a comment that advises an inventory will be added and so we cannot find any evidence that an inventory of wastewater and waste gas streams has been addressed sufficiently with regard to the aspects mentioned above.

As previously mentioned, whilst any revised information submitted in response to this question may be made available in the EMS, we are specifically asking for this to be provided as part of the BAT assessment document without referring to any documents for further information.

**11. Explain how indirect emissions to water (via the sewer) are managed in line with BAT conclusions 6 and 7 addressing the following points:**

- a. How you will monitor emissions discharged to the sewer in line with BAT conclusion 6 and 7.
- b. How you will assess the fate and impact of substances discharged to sewer following the Environment Agency's risk assessment guidance.

**Reason for Question**

On assessment of the BAT assessment document you have stated "There will be no discharges to surface water from the process", however we consider a discharge to sewer to represent an indirect discharge to surface water and therefore BAT 6 and 7 are applicable." Under BREF guidance BAT conclusion 6 for relevant emissions to water as identified by the inventory of waste water streams, BAT is to monitor key process parameters (e.g. waste water flow, pH, temperature, conductivity, BOD) at key locations (e.g. at the inlet and/or outlet of the pre-treatment, at the inlet to the final treatment, at the point where the emission leaves the installation). Under BREF guidance, BAT conclusion 7 emissions to water must be monitored at specified frequencies, and in accordance with EN standards (or alternative standards that ensure the provision of data of an equivalent scientific quality).

Under both guidance Chemical waste: appropriate measures for permitted facilities and Non-hazardous and inert waste: appropriate measures for permitted facilities you must identify the main chemical constituents of your facility's point source emissions to water and sewer as part of your inventory of emissions.

**12. Provide the safety data sheets for raw materials used on site.**

**13. Provide information regarding raw materials storage addressing the following:**

- a. What material has been used for the containers/storage units?
- b. Where are they stored on site?
- c. What are the maximum volumes stored?

**Reason for Question**

Under BREF guidance BAT conclusion 11 the annual consumption of raw materials should be monitored. On assessment of your application, you have provided confirmation in the BAT assessment document that the operator will monitor the use of raw materials and in the main application supporting document under section 3 you have provided table 3.1, however without the safety data sheets or the additional aspects listed above, we will do not have all the information to allow for a full assessment. The safety data sheets will provide us with the specific main hazards for the raw materials, which will allow us to assess impacts for example from the emissions to sewer (i.e. flocculant impact on fish) that would help inform our external consultees such as Natural England during the habitat assessment.

**14. Provide a written description of how you ensure that equipment and pipes are not subject to corrosion.**

**15. Provide a written description of how the design and maintenance of the external storage vessels in containment area C will effectively prevent or reduce diffuse emissions to air, in particular of organic compounds and odour.**

- 16. Provide a written description of how the design and maintenance of buildings 2 and 3 will effectively prevent or reduce diffuse emissions to air, in particular of dust, organic compounds and odour.**
- 17. Where the design of the external storage vessels and buildings (2 and 3) cannot prevent and/or reduce diffuse emissions in line with BAT requirements and appropriate measures, provide evidence-based alternative measures for the containment of diffuse emissions demonstrating an equivalent level of environmental protection to full enclosure.**

**Reason for Question**

*Under BREF guidance BAT conclusion 14c corrosion prevention should be considered. On assessment of your application we can find any mention of how corrosion prevention has been addressed.*

*Under BREF guidance BAT conclusion 14d states “containment, collection and treatment of diffuse emissions by storing, treating and handling waste and material that may generate diffuse emissions in enclosed buildings and/or enclosed equipment, and by maintaining the enclosed equipment under adequate pressure should be considered”. On assessment of the application main supporting document you have stated in section 5.1.3 “The tanks which provide buffer storage of liquid wastes will include vents which may result in fugitive releases during filling operations, but these releases would be intermittent and not significant.”, we fundamentally disagree with this statement on the basis that the scope of wastes potentially accepted will result in a varying array of odour profiles with organic components, that the residence times of up to 3 months are particularly significant and that vents do not effectively prevent diffuse emissions from leaving the site boundary. This would also apply to the three-sided buildings 2 and 3, which outside of general housekeeping and stock rotation do not appear to offer other techniques that would equate to an equivalent level of environmental protection to that of full enclosure. The currently proposed storage and treatment operations within the external storage tanks and buildings 2 and 3 are not considered BAT. Any alternative measures that are proposed must be evidence based and clearly demonstrate an equivalent level of environmental protection to full enclosure.*

- 18. Provide a separate site layout plan that demonstrates all surface areas regarding their impermeability, broken down into the following categories:
  - a. Impermeable**
  - b. Hardstanding**
  - c. Unmade ground****
- 19. Provide written confirmation that the drainage system is fully sealed within an impermeable surfaced area to prevent uncontrolled emissions from being discharged via the drainage system.**
- 20. Provide a detailed written description of the secondary containment in line with BAT 19d using the principles of CIRIA 736 guidance ensuring you address the following information:
  - a. The specific dimensions (in M<sup>3</sup>) of all external storage tanks and their bunding capacities to demonstrate that 110% of the largest tank or 25% of all tanks within that bunded area (whichever is the greater value) has been provided.**
  - b. Contextual information of how the engineered designs achieve the principles of CIRIA 736, including how the potential jetting of liquid wastes are prevented from leaving the site boundary/bunded areas.**
  - c. Other quantifiable measurements such as the bund walls minimum/maximum height.**
  - d. Materials used for the construction of the bunds.**
  - e. Confirmation that the bund will be built as an impermeable structure with no perforations.**
  - f. Details of contingency arrangements should a spill/catastrophic failure occur in the bund (e.g. how is the resultant spill controlled and what happens to it?).**
  - g. Written confirmation of how you will use dynamic testing to ensure the bund will hold.**
  - h. Any inspection and detection procedures to ensure the bund integrity is maintained.****

### **Reason for Question**

*Under BREF guidance BAT conclusion 19c depending on the risks posed by the waste in terms of soil and/or water contamination, the surface of the whole waste treatment area (e.g. waste reception, handling, storage, treatment and dispatch areas) must be made impermeable to the liquids concerned. On assessment of your submission the site layout plan appears to indicate that the site is mainly concreted with a sealed drainage system, however we cannot see that this has fully been demonstrated or confirmed other than the indications we have from the site layout plan. It is therefore not clear which areas are permeable and impermeable.*

*Under BREF guidance BAT conclusion 19d tanks for liquids must be provided with suitable secondary containment, and a detailed assessment of site infrastructure should be provided (e.g. secondary containment, tank specification, surfacing, etc.). The site infrastructure should be compared with the relevant industry/construction standards (e.g. CIRIA guidance C736 for secondary containment and C535 for above-ground tanks etc.). The assessment should include as a minimum the physical condition of primary containment systems (storage and treatment vessels), secondary containment (bunds), loading and unloading areas, transfer pipework/pumps, temporary storage areas and liners underlying the site. It should take into account the suitability for providing containment when subjected to the dynamic and static loads caused by catastrophic tank failure. Where the relevant containment standards are not met, a demonstration that their design and construction will achieve equivalent protection should be provided, along with an explanation of any work required to ensure compliance with the industry standards or equivalent. Your assessment should also include a preventative maintenance and inspection regime for site infrastructure identified.*

**21. Provide a written description of how the site will meet the expectations of BAT conclusion 20 addressing the following points:**

- a. An explanation how you will comply with BAT point 20 in order to reduce emissions to water using an appropriate treatment method or;**
- b. Provide your alternative technique for treatment of waste water, demonstrating how this will provide a level of environmental protection that is equivalent to techniques specified in BAT conclusion 20.**
- c. If an alternative method is proposed provide a cost benefit analysis.**

### **Reason for Question**

*Under BREF guidance BAT conclusion 20 In order to reduce emissions to water, BAT is to treat waste water using an appropriate combination of the techniques as specified for preliminary and primary treatment, physico-chemical treatment and solids removal. You have stated in the BAT assessment document that "there will be no emissions to surface water therefore, BAT 20 will not be relevant to the proposals." We fundamentally disagree with this statement considering the emission to sewer represents an indirect emission to water. No information has been provided on what treatment will take place specifically on emissions discharged to the sewer or how the existing treatment activities across the wider operation will effectively reduce emissions, hazardous substances and pollutants within the waste water discharged to sewer. You have not demonstrated how you will be able to meet the ELVs for BAT 20, or provided an alternative technique for assessment.*

## **Section 2 – Appropriate Measures**

Chemical waste: appropriate measures for permitted facilities and Non-hazardous and inert waste: appropriate measures for permitted facilities provides guidance for regulated facilities with an environmental permit to treat or transfer chemical waste, non-hazardous and inert waste. In line with the above guidance, we require responses to the following questions:

**22. Provide an appropriate measures assessment document covering both the chemical waste and the non-hazardous and inert appropriate measures. Ensure that it addresses the following aspects:**

- a. It should be a standalone document that does not reference other documents for further information such as the EMS.**

- b. It addresses each relevant section and point demonstrating clearly that the activities onsite reflect the proscribed measures detailed in the guidance.
- c. Where alternative measures are proposed, evidence-based justification that those alternative measures provide an equivalent level of environmental protection to those proscribed in the guidance should be provided.

**Reason for Question**

*On assessment of the application supporting documents, we cannot find any defined assessment of the operational measures against those proscribed in the appropriate measures guidance. Furthermore, you have also not acknowledged or referenced the appropriate measures guidance (both chemicals and Non-haz and inert) anywhere in your application. Significantly these guidance documents are missing from the list provided in section 1.7 'Documents Consulted'/1.7.1 'Legislation and Guidance', which leads us to believe they may not have been utilised to inform the operators application. We therefore request a fully comprehensive assessment document to be produced that addresses each relevant section/point in order for us to commence with determination.*

**Section 3 – Waste Codes**

Waste classification should be undertaken in accordance with Technical Guidance WM3. In line with the above guidance, BAT, appropriate measures for chemicals and appropriate measures non-haz/inert waste, we require responses to the following questions:

- 23. Provide alternative six digit waste codes in accordance with WM3 guidance for waste streams you expect to accept under the currently proposed 99 codes.**

**Reason for Question**

*99 codes should only be requested in the event that existing codes under WM3 are not suitable for the specific and individual waste streams expected to be accepted at the site. 99 codes should not be used to future proof a sites potential acceptance of hypothetical waste streams that have not yet been identified as likely to be accepted (i.e. based on a specific industry/source). When applying specific waste codes under WM3 you should be able to define the codes according to the waste stream under those subsections without defaulting to broader descriptions that are vague and/or non-descript.*

- 24. In the event that a specific waste stream is not defined as an existing code in WM3 as above, provide the following detailed and evidenced information for the remaining 99 codes you wish to apply for:**
- a. **Written justification for why the specific waste stream is not covered by an existing waste code using the sub sections of WM3. For example, if a waste stream is represented by sub section 19 05 'wastes from aerobic treatment of solid wastes' – then justification for each 6-digit code under that subcategory will be required (e.g. non-composted fraction of municipal and similar wastes 19 05, non-composted fraction of animal and vegetable waste, etc.)**
  - b. **Clearly defined and narrowed down descriptions of the specific waste streams expected to be accepted on site using the descriptor associated with the appropriate WM3 waste code subsection. For example, 'waste not otherwise specified (limited to ...)'.** The description should be representative of each individual waste stream and not used as a vague description of many waste streams under an umbrella 99 code.
  - c. **Written descriptions of the expected waste streams including where they are expected to be sourced from (e.g. type of industry), characteristics of the waste streams (e.g. inorganic, organic, liquid, solid, etc) and confirmation these waste streams are expected to be accepted on the site.**

### **Reason for Question**

*You have provided examples under each 99 waste code as part of your response to the not duly made notice (submitted 07/10/2024), however it would appear that a lot of the examples you have included, could reasonably be expected under existing codes, for example 19 05 99 - Screening Rejects could potentially be reasonably coded under 19 05 01 'non-composted fraction of municipal and similar wastes' and 19 05 99 unusable compost could be reasonably coded under 19 05 03 'off-specification compost'. We are unlikely to grant 99 codes that act as an umbrella code for many separate wastes streams with broad descriptions and will only grant 99 codes when the descriptions, sources and waste streams expected (not hypothetical unidentified waste streams currently not accepted) are fully evidenced and justified for use under a 99 code when compared against the existing set of codes under WM3. The current set of 99 codes only includes examples rather than an evidence-based list of identified waste streams the site will be taking that cannot be coded elsewhere in the WM3 guidance.*

**25. Provide a revised set of EWC lists, separated according to the individual activities, ensuring full descriptions representing the waste streams expected to be accepted on site are provided.**

**26. Provide the annual throughput associated with each activity and associated waste table.**

### **Reason for Question**

*On assessment of both the EWC list table 2.2 provided with the updated non-technical summary and the list of waste codes separated by activity (both submitted 07/10/2024) we feel that the absence of the full descriptions on the separated list makes it very difficult to cross reference against activity type, especially considering the separated lists features codes provided outside of numerical order. Aspects of these two sets of listed of codes should be merged together into one set of tables (fully described codes separated by activity). In addition, there are a lot of waste codes that feature broad descriptions such as wastes containing dangerous substances, which require a narrower description representative of identified waste streams expected to be accepted. We have also noticed some inconsistencies such as the waste code 17 08 01\* appearing in the table 2.2 list, which has been omitted from the separated EWC list. To maintain consistency, we are requesting a fully detailed set of EWC tables for each activity and with full descriptions.*

*We require a breakdown of the annual throughput for each activity (split between for non-hazardous/hazardous and recovery/disposal). We shall use these individual throughput values when we draft the separate EWC tables into the permit and so they should be an accurate representation of what you expect to treat/store each year under the individual activities.*

**27. Provide the following information for all the hazardous waste codes featuring the description "...containing dangerous/hazardous substances" (01 05 06\*, 05 01 09\*, 07 06 11\*, 15 01 11\*, 16 01 14\*, 16 10 01\*, 16 10 03\*, 17 05 05\*, 17 05 07\*, 17 08 01\*, 19 07 02\* 19 08 11\*, 19 13 03\*, 19 13 05\*, 19 13 07\*):**

- a. **What dangerous/hazardous properties/substances are these wastes expected to contain based on expected waste streams.**
- b. **What specific on-site treatment methods are incorporated into the process to treat the above hazardous properties/substances.**

**28. Provide the following information for all the hazardous waste codes featuring the description "oil/fuels/petrol/interceptor" (01 05 05\*, 05 01 05\*, 13 01 11\*, 13 01 12\*, 13 01 13\*, 13 04 01\*, 13 04 02\*, 13 04 03\*, 13 05 01\*, 13 05 02\*, 13 05 03\* 13 05 06\*, 13 05 07\*, 13 07 01\*, 13 07 02\*, 13 07 03\* 19 08 10\*):**

- a. **What specific on-site treatment methods are incorporated into the process to treat the above oils, fuels and petrol contaminated wastes (or oil/petrol contaminated interceptor wastes).**
- b. **What separation methods are used to separate the oily components of the above wastes.**
- c. **How will you ensure non-compatible wastes are not treated/stored together, such as antifreeze and oily wastes or gypsum contaminated wastes and biodegradable wastes?**

**Reason for Question**

*On assessment of the EWCs provided and having looked at the proposed activities, we have only identified treatment in the form of flocculation, dewatering and filtration (physical/chemical activity) and bulking, sorting and repackaging (repackaging activity). It would appear from the supporting documents that the primary function of the activities undertaken in buildings 1 and 2 is separate solid fraction from the water based liquid wastes. We are unable to identify any explanation in the application that seeks to demonstrate the proposed treatment activities clearly address the hazardous/dangerous properties, oils and/or fuel components of the wastes you are looking to accept, such as oil separation or treatment methods that intend to reduce or eliminate hazardous properties prior to discharge. Furthermore, the broad descriptions of the waste codes applied for together with the lack of information relating to the characterisation of those wastes within the supporting documents would lead us to believe the treatment methods on site have not been informed based on the properties those wastes possess. For example, the site would need to incorporate wholly different treatment methodologies for treating antifreeze contaminated waste as it would for oily wastes, and those waste streams would need to be kept separate throughout the process (from reception to recovery/disposal).*

**Section 4 – Storage and transfer**

In line with BAT, appropriate measures for chemicals and appropriate measures non-haz and inert waste, we require responses to the following questions:

- 29. Provide confirmation that the repackaging of wastes containing POPs, will not be mixed with non-POPs containing waste to knowingly dilute those wastes for onwards transfer.**

**Reason for Question**

*In accordance with section 4 of appropriate measures for chemical waste under ‘sorting, repackaging and bulking’ the repackaging of wastes containing POPs, should never be knowingly mixed to dilute the level of POPS in those wastes solely to generate a mixture below the defined low POPs content. The above question seeks clarification that the operator will adhere to this specific measure.*

- 30. Provide confirmation of the maximum residence times for wastes stored within the external tanks – those located in containment zone C – and provide detailed information demonstrating how biological activity in those tanks will be inhibited.**

**Reason for Question**

*On assessment of the odour management plan Table 1.1 page 6, you have specified a maximum retention time within the tanks of 3 months. Some of the wastes you intend to accept are sludges which have the potential to be biologically active (sludges from wastewater treatment sites for example). Storage of these wastes for prolonged periods could prompt biological processes that may change the composition of those*

wastes and constitute a biological treatment process that has not been applied for as part of the permit application. Furthermore, off gases produced from the biological process would potentially be released through the storage tank vents or through any proposed abatement (not necessarily suited to deal with biogas), which would represent an uncontrolled emission of waste gas to air.

- 31. Provide a written description of how waste containing gypsum shall be stored to prevent saturation/contamination from organic materials that could give rise to odorous compounds and/or cause a reaction of the waste itself.**

**Reason for Question**

*On assessment of the supporting documents, we cannot find any details relating to the storage of gypsum (waste codes 17 08 01\* and 17 08 02) and how those storage arrangements prevent the ingress of liquid wastewater, rainwater, surface water or prevent the waste from being mixed with organic/biodegradable material.*

- 32. Provide a written description of how you will prevent wastes stored in the quarantine area in the centre of the yard from contaminating the surface water drainage (via the open gulleys).**

**Reason for Question**

*On assessment of the FPP and site layout plan, it is clear that the quarantine area located in the centre of the yard, is situated adjacent to the open surface water gulley that drains to sewer. Surface waters should be kept free from contamination by any wastes stored, processed and/or treated on site. Whilst bunding appears to have been provided for the storage areas in building 1, 2 and 3 this is not the case for the quarantine area, which may be used to store hazardous wastes as well non-hazardous waste. If the rainwater were to saturate those wastes, contaminated rainwater runoff could migrate into the open gulley contaminating the surface water, representing an uncontrolled emission of wastewater.*

- 33. Provide a detailed written description of how wastes are transferred through building 2 addressing the following aspects:**

- a. **Description of how the Hydro Max unit transfers liquid based waste/sludge, considering the use of a conveyor belt unlikely for that waste type as it would be ineffective at transferring liquids/sludges of a lower dry solids content.**
- b. **Description of how sludges/water based liquid wastes leave the Hydro Max unit and enter the first tank in containment zone C.**
- c. **A detailed description of how the Hydro Max unit operates including the differences between the CDE G-Max route and the CDE Hydro-tip route as these parts of the plant do not appear to operate in a linear fashion.**

**Reason for Question**

*With the limited information provided in the non-technical summary and the site layout plan, we are unable to discern how waste is transported through the process within Building 2. There are a number of unknowns, such as how the Hydro Max unit operates, how the conveyor belt functions with sludges/liquid based wastes forming the main accepted waste and how wastes are sent through to the tank in containment zone C (there appears to be no connection in the Site layout plan)..*

**34. Provide a written description for what happens to incoming wastes that are due to be introduced into the Hydro Max pit in building 2, ensure you address the following aspects:**

- a. What happens to tankers/vehicle accepted on the site as they wait for access to the pit to unload.
- b. How long does the pit clear out operation between hazardous and non-hazardous waste loads take to complete.
- c. Does the site utilise any alternative storage on site for incoming loads prior to introduction into Hydro Max pit?
- d. Confirm that the Hydro Max pit represents the only reception point for incoming wastes for the water based liquid waste treatment activity.
- e. Identify any other area or assets on site that represent a reception point for waste.
- f. A description of procedures to ensure tanker drive off is not undertaken during injection of wastes
- g. An explanation of how you will contain any leaks, (including worst-case leaks), spills and drips from the transfer of tankered waste at dedicated points.
- h. An explanation of how you will comply with 'wash out' certification for tankers.

**Reason for Question**

*With the available information we are unable to discern any arrangement that may be in place for tankers delivering loads and how these will be affected by the clear out operation in the pit or when the pit is already contains waste of a different type (haz vs non-haz). We also cannot find any information relating to tanker drive- off, wash out certification and only limited information regarding how the site prevents, detects and mitigates spills in the handling and transferring of waste in an accordance with BAT conclusion 5.*

**35. Confirm whether any wastes are introduced into reception areas/assets located on containment zone c or in building 1 for the purposes of storage and/or treatment within those areas/building only (effectively bypassing the operations in Building 2).**

**Reason for Question**

*In the case that wastes are accepted directly into the assets/areas beyond building 2, for storage pending treatment in building 1 only, we would consider the operations in building 2 to be operable independently of those in building 2 and therefore represent a further chargeable activity (for hazardous/non-hazardous and recovery/disposal charged with the duplicate fee reduction representing four potential new fees that need to applied).*

*If this is the case we reserve the right to levy further charges in accordance with our charging scheme.*

**36. Provide a written description of how tanks/assets and associated pipework are designed and maintained to ensure full segregation of non-compatible wastes (haz vs non-haz, oils vs antifreeze, etc).**

**37. Provide a written description for how each tank/asset and section of associated pipework between tanks/assets is fully cleaned out between batches of non-compatible wastes to maintain segregation and prevent cross contamination.**

**Reason for Question**

*Under BREF guidance BAT conclusion 2e which requires the operator to ensure waste segregation. You must ensure that non-compatible wastes (such as oily waste and antifreeze) as well as wastes that are*

*hazardous and non-hazardous are treated, stored and transferred through assets and pipework that are segregated, or where assets, pipework is used for both types of waste, then clear demonstration that full cleanout is undertaken between batches to prevent cross-contamination. On assessment of the site layout plan and non-technical summary we cannot see any evidence that wastes are kept segregated and free from contamination beyond the initial acceptance into the pit of the HYDRO-Max plant in building 2. Even in the case of the reception pit you have only confirmed waste removal and clear out between batches as opposed to a full clean-out of the asset to prevent cross contamination.*

## **Section 5 – H1 assessment (indirect emissions to water)**

Wastewater emission assessments should be undertaken in accordance with the guidance: Surface water pollution risk assessment for your environmental permit. In line with the above guidance as well as BAT (namely BAT conclusions 3, 6, 7 and 20) and appropriate measures (both chemicals and non-hazardous/inert), we require responses to the following questions:

**38. Provide the raw data (source data) used to inform the H1 assessment for the indirect discharge to water (sewer discharge) and;**

**39. Provide any relevant contextual information to help us understand the choice in raw data used (in the case of proxy or estimated data).**

### **Reason for Question**

*We require the raw data used for the screening (H1 assessment), so we can verify the results and concentrations provided and assess whether the conclusions can be accepted. We also require evidence that the raw data was obtained inline with UKAS requirements, so we can assess the confidence levels.*

*To do chemical analysis you will need to take samples of the discharge and send them to a United Kingdom Accreditation Service (UKAS) accredited laboratory. Make sure the laboratory tests for all pollutants which you expect to find in the discharge and that they use an appropriate 'minimum reporting value' (MRV) (usually 10% of the environmental quality standards (EQS)).*

*You must submit the chemical analysis data that's been analysed to an appropriate MRV by a UKAS accredited laboratory with your application. If you submit data which has not been analysed to an appropriate MRV, you must tell the Environment Agency why.*

*If you have used proxy or estimated data then you will need to still provide the raw data used to inform the H1 and provide contextual information regarding the source of the data and why this was chosen.*

**40. Provide evidence-based justification that the data used in the H1 assessment is representative of all waste that the site is expected to accept and treat as well as being ultimately representative of the discharge fraction to sewer.**

### **Reason for Question**

*On assessment of you application you provided a wide array of waste EWC codes/descriptions, some of which contain hazardous or dangerous substances. We need to be able to confirm that the wastes you accept, treat and the resultant properties that are discharged to sewer are realistically represented within the modelling you have provided. In line with the surface water guidance mentioned in this section, you should be aware of the hazardous chemicals and elements (also known as 'specific substances') and be able to evaluate and assess any hazardous chemicals and elements you plan to release into surface water, in this case indirectly via Aylesford Sewage Treatment Facility. Those hazardous chemicals and elements should be able to be traced through their acceptance as wastes and subsequent treatment within your operation*

and should therefore be based on the wastes you expect to accept, rather than the broad array of 'possible wastes' as we currently suspect is possibly the case with your existing waste lists/descriptions.

## **Section 6 – Odour management plan (OMP)**

Odour Management plans should be completed in line with guidance Environmental permitting: H4 odour management and Best Available Techniques (BAT) Reference Document for Waste Treatment. Revise the OMP addressing the questions below:

**41. Provide both the site name and permit number that the OMP relates to.**

### **Reason for Question**

*Currently the OMP makes no reference to the permit number or the site name (Unit 1) anywhere within the document, it should be clear within the plan which permit and exact address this document relates to.*

**42. Provide details of the person responsible (job title) for the OMP and training of staff.**

**43. Provide the location that OMP will be stored to ensure staff can access the document when needed.**

### **Reason for Question**

*On assessment of the OMP you have provided confirmation that staff are trained on the contents of the OMP every 6 months but have not confirmed who is responsible for ensuring the training is carried out and who is responsible for the OMP itself. Furthermore, you have not confirmed where the document is kept within the site to ensure staff can always access the OMP.*

**44. Provide the details of other guidance documents that would inform the contents of the OMP, such as BAT and Appropriate Measures.**

### **Reason for Question**

*On assessment of section 1.2 'Relevant Guidance', you have only provided the details of the "H4 Odour Management: How to Comply with your Environmental Permit, EA, March 2011", you have not made any reference of BAT or the Appropriate measures guidance which would reasonably inform the contents of the OMP. These documents should not only be referenced here but also be actively considered throughout the contents of this document, specifically BAT conclusions 8, 10, 12, 13, 14d and 53 and sections 6 and 7 of both the appropriate measures documents (chemical and inert/non-haz).*

*Regarding the applicability of BAT regarding odour, which states "The applicability is restricted to cases where an odour nuisance at sensitive receptors is expected and/or has been substantiated", we are confident that based on the odorous properties of the wastes you intend to accept on site and proximity of sensitive receptors that odour nuisance will be expected.*

**45. Provide the following details relating to odorous materials arriving on site:**

- a. Clarification that the reception point for waste detailed in section 3.1.1 is in fact building 2 (as per the information provided by the other supporting documents submitted as part of this application).
- b. Written description of the types of containers that will be used to deliver waste for repackaging by the delivery vans.
- c. Written description of the instructions provided to drivers arriving on site to ensure they adhere to onsite policy.
- d. A revision of the acceptance procedure provided in section 4.2.1 in relation to the waste rejection criteria and policy for overly odorous wastes arriving on site.
- e. A revision of the statement in section 1.6.1 relating to the acceptance of putrescible wastes considering the operator has applied for 02 02 wastes.
- f. A revision of the statement made in 3.5.1 relating to waste for repackaging being non-odorous (based on the current list of wastes this statement is potentially misleading).

**Reason for Question**

*On assessment of the OMP relating to incoming wastes, we can see a number of inconsistencies, such as building 1 being described as the reception building where as building 2 has been identified as such in the other supporting documents, and the statement that the site does not accept putrescible waste when 02 02 wastes have been applied for. The acceptance procedure makes no reference to overly odorous wastes which would be expected to be addressed in an OMP. We have also noted a lack of information regarding the delivery vans and containers used to bring in wastes for repackaging as well as any instructions given to vehicle drivers when arriving on site to make them aware of onsite policy. Based on the current list of wastes applied for you will need to revise a number of statements expressing wastes are either non-putrescible or non-odorous.*

**46. For your choice of odour control unit (OCU), update your OMP to include an explanation of how you will control the process and maintain process parameters to ensure effectiveness. This should include but not be limited to:**

- a. Optimum flow rate through the system to allow for effective treatment.
- b. Absorption material type and frequency of / triggers for replacement.
- c. The trigger levels/ranges for action if processes monitoring parameters are breached/ outside optimal parameters.
- d. Odorous components in the gas stream and concentrations of emissions.
- e. Physical properties of the air stream at point of control i.e., humidity, optimum temp, pH for effective odour control.

**47. Based on the above information provided in question 46 above:**

- a. Explain why the abatement system has sufficient capacity and is appropriately designed to effectively treat the odorous air stream(s).
- b. Provide a process flow diagram to show which activities or parts of the process the abatement system serves, and identify any areas where odour is not contained.
- c. Where odour is not contained in line with requirements, explain how this will be achieved.

**Reason for Question**

*On assessment of the OMP we cannot see that you have assessed your odorous substances emissions or have demonstrated you have procedures in place to manage control measures ensuring they are effective. You have not provided the monitoring techniques of process controls to ensure effective operation and we cannot find any information addressing any of the above points for process parameter monitoring for odour*

control. This is concerning considering the only building subject to odour abatement is building 1 and by your own admission, “door and entrances within that building may lead to uncontrolled odour emissions leaving the building” despite maintaining a negative pressure environment.

- 48. Update your OMP to include a detailed inventory of odorous materials. The inventory must identify their location on site and categorise the risk associated with each material identified (e.g. high, medium, low). For each of the materials identified, the inventory should include, but not be limited to:**
- a. Single/groups of waste considered odorous including EWC code and description.
  - b. Source of waste odour including compounds.
  - c. Individual processes giving rise to odours that make up the steps of the activities themselves (such as introduction of waste into the pit, conveyor belt carrying odorous solids, etc).
  - d. Maximum capacity.
  - e. Retention times.
  - f. Odorous waste produced on site.
  - g. Odorous liquids produced on site
  - h. Odorous gases produced on site
  - i. Odorous raw materials on site.
  - j. Odour risk of material (e.g high, medium, low).
  - k. Location on site.
  - l. Type of storage.

#### **Reason for Question**

Your OMP should include an inventory, with descriptions and quantities, of all potentially odorous solid, liquid and gaseous materials held on site as well as odorous processes. On assessment of your OMP you have provided table 1.1 that only offers two odorous sources based on either the repackaging operation or the treatment of liquid-based waste. The level of detail does not adequately capture the types of wastes involved and individual processes that make up those activities in way that can be sufficiently extrapolated to establish a fully informed risk profile. Whilst you have included type of storage, maximum waste volumes, retention times and odour risk rating, we have chosen to include these elements in the list above to ensure they are retained in a much more detailed revision of this table. The OMP is standalone document that requires the inclusion of an EWC list upon assessment of that document, so must be included during determination rather than updated retrospectively. We also need to be able to trace the odour source to its location on site. You may wish to separate the table into two, one for the waste types and one for the waste processes.

- 49. Provide a written description together with evidence-based justification for how the alternative measures listed in section 1.5.1 provide an equivalent level of protection to enclosure with odour abatement for the following:**
- a. Building 2
  - b. Building 3
  - c. The three external tanks in containment zone C.

#### **Reason for Question**

On assessment of the OMP it is clear potentially odorous wastes shall be processed/stored within the two three-sided buildings and stored for a significant period inside external tanks located in containment zone C. None of these buildings/assets have odour control units or associated emission points. You have specified in

section 1.5.1 alternative measures consisting of monitoring, stock rotation and housekeeping. The monitoring is currently proposed as a reactive measure rather than routine and proactive; this is evidenced by the numerous references to 'if required' in section 5. The stock rotation is based on storage in enclosed tanks, however all evidence suggests the tanks are vented and so cannot be considered fully enclosed. The section on housekeeping does not provide enough detail or evidence to prove that it is a suitable alternative measure by itself.

We note that section 4.5.1 states in relation to the external tanks "These will be maintained under pressure (pumped) into sealed tanks, ensuring that odour control is within place at the point of venting for tanks." However, we cannot see any evidence of any odour abatement for these external tanks and have assessed other documents for this application (the non-technical summary) that clearly state these tanks are vented without any abatement.

- 50. Update your OMP to include a section which outlines the proposed monitoring for the odour point source A1 (LEV) and other point sources that may be proposed as required by BAT conclusion 10 of the BREF Waste Treatment Guidance. The section must demonstrate the EN standards or alternative techniques that will be applied to each point source emission in line with BAT 10 to periodically monitor either odour concentration or exposure.**

#### **Reason for Question**

Your OMP does not identify the monitoring requirements which are required by BAT 10. This BAT point is considered applicable because the site processes odorous waste for which odour is expected at sensitive receptors. We cannot find any indication within this document that the operator will carry out odour monitoring in accordance with BAT 10 requirements.

- 51. Update your OMP to address the odour process control monitoring addressing the following points:**
- a. Explain for each activity identified in question 46/47 what process parameters (e.g. temperature, flow concentrations, storage durations and amounts) will be monitored and what triggers (e.g. max threshold above which odour will be an issue) are used to ensure odour on site is minimised.**
  - b. Outline the actions to be taken if the processes in questions 46/47 are outside their optimum process parameters, or trigger levels are not met.**
  - c. include time scales for rectification of trigger actions identified, and responsibilities for who will carry out the actions identified.**

#### **Reason for Question**

H4 guidance states that appropriate monitoring should be undertaken for every stage of process control (i.e. emissions, dispersion and impacts). The interpretation of monitoring results should be considered in advance and, where appropriate, monitoring trigger values should be specified for the implementation of contingency measures. Your OMP Section 2 – 'Odour risk assessment' describes the odour intensity and receptor sensitivity informing section 5 however the control measures and monitoring featured in both sections 4 and 5 do not factor in any trigger levels and monitoring or subsequent actions that would be taken in the event of a process or asset failure. The main focus within section 4 appears to relate to waste acceptance, housekeeping and odour control by abatement in the main building as opposed to the other two buildings. In Section 5 the words 'if required' and 'when necessary' feature quite heavily, which could be construed as non-committal wording and reactive rather than proactive in nature. Neither section really explores trigger levels and subsequent remedial actions to be taken. Whilst section 4 details that 4.2.3 stating waste will be diverted, this section does not address potential cessation of operations or cessation of accepting waste based on specific scenarios relating to odour.

**52. Update your OMP to address the following points regarding sniff testing and odour monitoring:**

- a. **Demonstrate that your sniff testing methodology addresses the principles set out in H4 odour management guidance and the requirements of BAT conclusion 12.**
- b. **The location of your odour monitoring points shown clearly on a site plan.**

**Reason for Question**

*Section 5 'Monitoring' in your OMP states 'odour will be monitored if there is a spillage of potentially odorous material, if an odour is detected on-site or in the event of odour complaint arising.' We can see no mention of routine sniff testing in line with H4 recommendations. You have not provided reassurance that routine monitoring will take place and have not specified a frequency of sniff testing. As such you have not met BAT 12 requirements. You have not identified any odour monitoring points on a site plan and whilst you have stated you have not done so due to the changing predominant wind direction we would disagree with this justification on the basis that odour monitoring points could be placed strategically around the site to account for prevailing wind direction at the time of monitoring.*

**53. Identify the odour risk on site from materials, processes and abnormal operations using the source, pathway and receptor model both before and after implementing control measures to demonstrate that the risk posed by the sources is adequately addressed.**

**Reason for Question**

*H4 guidance advises that your OMP should demonstrate the effectiveness of control measures by identifying how source, pathway and receptors are managed to prevent odorous emissions leaving the site. Your OMP addresses control measures in section 4 'odour control' however it does not factor in the source, pathway receptor model and does not provide enough detail to demonstrate it has been established and informed based on a robust risk assessment.*

- 54. Provide your inspection checklist or site rounds summary to demonstrate how housekeeping is carried out across the site and how records are kept.**
- 55. Provide the frequency that housekeeping tasks shall be carried out.**
- 56. Provide details of who is responsible for ensuring housekeeping is undertaken onsite.**

**Reason for Question**

*H4 guidance advises that your OMP should demonstrate that housekeeping tasks are recorded to ensure they are carried out by staff. In addition, we cannot find any details regarding specific frequency that housekeeping is undertaken, the individual tasks and who on site is responsible for ensuring it is carried out. Section 4.9 provides just two sentences that outline regular cleaning will take place however this is not expanded on with any information such as site rounds or an inspection checklist.*

**57. Remove the repeated section 6.7 as this has already been included in as section 4.10.**

**Reason for Question**

*We require the odour management plan to be a clear and consistent standalone document, currently there is a section that has been repeated unnecessarily.*

## Section 7 – Fire prevention plan (FPP)

Fire Prevention Plans should be completed in line with guidance Fire prevention plans: environmental permits and Best Available Techniques (BAT) Reference Document for Waste Treatment. Revise the FPP addressing the questions below:

- 58. Provide details which show you have considered and mitigated for materials on site which are not covered by the guidance but still pose a fire risk (e.g. combustible liquids or hazardous materials). This includes any gas cylinders, fuel tanks, aerosols and chemicals on site. These materials should be shown on the site plan and confirmed to be adequately separated from combustible wastes.**

### **Reason for Question**

*You have confirmed in the main supporting document in table 3.1 that the site uses up to 2,000 litres of diesel and 4,000kg of activated carbon per year. Both of these raw materials are considered highly flammable and so the FPP should be revised to include considerations of how these raw materials are adequately stored to prevent fire spread. You should also consider the storage of other chemicals/raw materials that whilst not flammable may have a detrimental effect on the receiving environment should they come into contact with fire or firefighting water.*

- 59. Your FPP needs to ensure the fire prevention measures will be put in place and used on site. Provide details of regular training exercises on site to test how well your plan works and to ensure that staff understand all the requirements of it. This should include training in day-to-day operation (e.g. stockpile management), as well as incident response.**

### **Reason for Question**

*On assessment of the FPP section 1.4.1 lists member of staff and responsibilities on site. 1.4.2 also states everyone (staff and contractors) is to be made aware of the FPP. Section 6.2 outlines that full test drills are carried out every 12 months and that staff are given induction training with further FRS training available on request. We require more details regarding the breakdown of what the training involves (as mentioned above operationally are the staff trained proactively in stockpile management? how to respond to the incompatible wastes being identified during acceptance? or any incident training for specific scenarios?).*

- 60. Provide a revised site plan that includes the following:**

- a. Any areas where hazardous materials are stored on site (location of gas cylinders, process areas, chemicals, piles of combustible wastes, oil and fuel tanks)
- b. Hydrants and water supplies
- c. Areas of natural and unmade ground
- d. The location of fixed plant or where mobile plant is stored when not in use.
- e. Drainage runs, pollution control features such as drain closure valves and fire water containment systems.
- f. Storage areas with pile dimensions and fire walls (where applicable) - includes wastes stored in a building, bunker, or containers, as well as temporary reception piles.

### **Reason for Question**

*On assessment of the FPP site plan we can see you have utilised the current site layout plan rather than providing a separate FPP focused site layout plan. As such the current site layout plan is missing many aspects we would consider vital for the purpose of cross-referencing the information within the FPP as well as illustrating separation distances, pile sizes etc and so you will need to ensure the listed points above are fully addressed in a revised FPP focused site layout plan.*

- 61. Provide detail of security measures on site, including CCTV (locations and directional view), a secure boundary and out of hours security monitoring.**

### **Reason for Question**

*Whilst you have supplied information indicating the above aspects may be in place, you have not provided details that would explain what CCTV coverage the site benefits from, information regarding out of hours CCTV monitoring and what kind of fencing the site utilises around its entire perimeter. The locations and directional view of the CCTV should be provided ideally as a visual plan to see which areas of the site they cover.*

- 62. Confirm that unused mobile plant will be kept away from combustible waste and provide details of this arrangement.**

### **Reason for Question**

*On assessment of the FPP we cannot find any indication that unused mobile plant is kept away from combustible waste, furthermore without any location for the storage for mobile plant being identified on the site plan, we cannot be certain that the storage is not near to or adjacent to combustible stock piles.*

- 63. Provide details of safe working practices, such as a permit to work system, for hot works (such as welding and cutting). In addition, provide details of a fire watch on site, should be in place for a suitable period after hot works have ended (particularly at the end of a working day).**

### **Reason for Question**

*On assessment of the FPP (table 2.1) we have noted the operator states "currently, there are no Hot works on site, In the event hot works are carried out on site, they will only take place on site under a hot works permit", the wording does not preclude the possibility for future hot works and so we need to know more details such as whether the operator would carry out a fire watch after the hot works have ended, etc.*

- 64. Provide details of the written procedures for waste acceptance checks to prevent reactions between incompatible or unstable wastes. You must use a quarantine area where necessary.**

### **Reason for Question**

*Whilst you have provided the waste acceptance procedure it appears not to be FPP specific and does not address the details such as hot loads and incompatible wastes that could lead to potential fires should they be mixed.*

- 65. Provide details of the procedures on site to ensure good stock rotation for all stored materials. Your fire prevention plan must show that you have a clear method to record and manage the storage of all waste on site (i.e. a process which allows the time on site to be determined for any applicable waste). You must show how you will follow the 'first in, first out' principle.**

**Reason for Question**

*On assessment of section 4.5 stock rotation, we could not find any information that would support the notion that the site undertakes stock rotation at all. Section 5.1.5 offered more information on this subject but lacked information that could be anchored to specific stockpiles to demonstrate the first in, first out procedure. We need to understand where on site the stockpiles exist and whether they have sufficient room to enable access at the back of a stock pile to remove waste in this manner, or in absence of that space what mobile plant and methodologies are used to ensure waste removal from the back of a stockpile is possible without the available space.*

- 66. Provide details of maximum volumes and sizes for waste piles on site. For all waste piles, the maximum height allowed is 4 metres and the maximum length or width allowed (whichever is the longest) is 20 metres. The table in 9.1 of the guidance outlines the maximum volumes for each type of waste. If your waste piles contain a mixture of combustible wastes, you should work out the maximum limits based on the type of waste that makes up the majority of a mixed pile. You need to consider the design, access and layout of a building when storing waste so a fire can be extinguished easily.**

**Reason for Question**

*On assessment of the FPP we note that Table 4.1 lacks detail regarding pile size dimensions and seems to make assumptions that waste in containers do not count towards storage limitations in line FPP guidance. Table 5.1.1 states that wastes are specified in the site plan, but on assessment of the site plan we can find no evidence that this is the case. Furthermore, the building used for storing combustible wastes (for repackaging) has not even been referred to by name 'Building 3' anywhere within the FPP. If building 3 is where all the storage is located within the building, we should be able to see the individual stockpile footprints and be privy to the exact storage dimensions within that building. We can see you have specified 50m<sup>3</sup> is the maximum pile size, but we cannot see where this would be located and how high the pile is or understand how this has been calculated.*

- 67. For waste in containers with a capacity greater than 1,100 litres, confirm each one will be accessible (so any fire inside it can be put out). In the event of a fire, you must be able to move containers as soon as is reasonably practicable. Provide details of the procedures you will put in place to allow this to happen.**

**Reason for Question**

*On assessment of the FPP and the other supporting documents it is clear that the wastes for repackaging are received within containers (containing residues) however as we have very little information regarding how these wastes are repackaged, we cannot be sure they are not bulked up potentially into larger containers prior to removal from site for onwards transfer. Without knowing the details of how the repackaging activity is carried out we cannot be certain that containers containing more than 1,100 litres of waste are not utilised on site. Section 7.1.2 places the largest storage area at 50m<sup>3</sup>, which would equate 50,000 litres and so it is entirely feasible that wastes may be repackaged into larger containers of more 1,100 litres..*

- 68. Confirm you will store combustible waste piles with a separation distance of at least 6 metres. Separation distances of 6m must also be in place between piles and the site perimeter, any buildings, or other combustible or flammable materials.**

**Reason for Question**

*As referenced within the previous questions you have not provided any information relating to individual waste stockpiles on site. As a result, we unable to determine if 6 metre separation distances are being observed.*

- 69. Provide details which show that fire walls and bays are designed to resist fire (both radiative heat and flaming) and have a fire resistance period of at least 120 minutes to allow waste to be isolated. Fire walls must show compliance with all factors outlined in Section 11.2 of the guidance.**

**Reason for Question**

*On assessment of the FPP we cannot see any information that describes fire walls or bays being used as the individual pile sizes have not been identified in the site plan or in the FPP. The dimensions of the walls for building 3 have not been specified, nor do we know what they are constructed out of or what the fire resistance period is. This must be supplied in order for us to be able to assess whether the construction of the building adequately controls the burn time to a minimum through a reasonable resistance period.*

- 70. Provide details of the quarantine area on site. The quarantine area must be within the boundary of the site for which the permit applies and be large enough to hold at least 50% of the volume of the largest pile. Confirm a separation distance of at least 6 metres around the quarantined waste will be in place.**

**Reason for Question**

*On assessment of the FPP we can see you have specified a quarantine area demonstrating it has a 6-metre separation distance around, however without the exact footprints and dimensions of the pile sizes mentioned in the previous questions we cannot be sure that quarantine area is adequate considering the largest pile size. It may be that the current quarantine area is sufficient, however we would need to verify that based on the response to the previous questions.*

- 71. Provide details of the detection system on site. The detection system should be proportionate to the nature and scale of waste management activities you carry out and the associated risks. For all automated systems the design, installation and maintenance should be covered by an appropriate UKAS-accredited third party certification scheme. If the system is not accredited, provide details as to why not and outline how the system will work on site.**

**Reason for Question**

*On assessment of the FPP we note that you have not proposed an automated detection system. You have provided justification outlining low waste volumes, the types of wastes accepted and that it does not prove a high enough risk, however we fundamentally disagree with the justification provided on the basis that the you are specifying a maximum storage volume of 50m<sup>3</sup> of wastes and wastes we would consider to have the potential to be highly combustible (waste petrol and oils). You have not provided evidence-based justification*

to support your assessment of low risk and so we regard the provision of automated detection equipment to be wholly required.

- 72. Provide details of the suppression system on site, ensuring the design, installation and maintenance of all automated suppression equipment is covered by an appropriate UKAS-accredited third party certification scheme. If the system is not accredited, provide details as to why not and outline how the system will work on site.**

**Reason for Question**

*On assessment of section 10.3 you have stated that the operator could fill a skip, although we cannot see on the site plan that the operator has access to stored skips or utilise skips as a routine storage method. Which means that the on site suppression system is represented purely by fire extinguishers at present. You have specified alternative measures regarding the small amount of waste kept in the building with some standard procedural commitments such as CCTV being available 24/7 but, we note you have not provided confirmation that it will be proactively monitored both during opening hours and out of hours and that it does not include technology such as heat detection. You have also specified fire watches and waste acceptance procedures however they do not provide a robust counter measure to an out of hours fire occurring. Considering highly flammable wastes are being accepted and stored within a building, it is the expectation that operators utilise an automated fire suppression system. We currently cannot accept your proposal for alternative measures as you have not provided evidence that the sum of these measures equates to an equivalent level of environmental protection to that offered by automated suppression.*

- 73. Provide site specific calculations for water supply in accordance with the guidance. You need to account for a worst case scenario, which is defined as your largest waste pile catching fire. As a guide, a water supply of at least 2,000 litres a minute for a minimum of 3 hours is needed to tackle a 300 cubic metre pile of combustible material (this equates to approximately 6.7 litres/minute for every 1m<sup>3</sup> of material).**

**Reason for Question**

*On assessment of the FPP section 10.2 you have confirmed that it is likely that the local industrialised area would have enough hydrant water to supply the 60,000 litres needed to ensure the fire could potentially be fought within a 3-hour window. Whilst we have verified the amount has been correctly calculated based on the 50m<sup>3</sup> largest pile size, as previously mentioned this pile size may be subject to revision based on the requirements of the previous questions. You have not provided specific information regarding the closest hydrant (distance from site, firefighting water availability and flow obtained from FRS, etc).*

- 74. Provide details of how you will contain the fire water run-off from entering the environment. You need to show that containment volumes are in accordance with water supply calculations. Include secondary and tertiary containment facilities for fire water run-off if applicable. If combustible wastes are to be stored on hard standing, please assess the potential effect of fire water on receptors.**

**Reason for Question**

*On assessment of the FPP you have confirmed the yard area and buildings will provide sufficient bunding so long as you construct kerbing that is above 0.3m however, you have also stated in section 7.2.1:*

*“In the event of a fire, the quarantine area will only be used to remove any wastes stored near any material which is smouldering or on fire (but not itself directly affected by the fire) to prevent the fire spreading. No*

*burning waste will therefore be moved to the quarantine area to ensure all firefighting waters will be contained within the site's sealed drainage area (i.e. the concreted areas)"*

*The above statement seems to indicate that firefighting water is only able to accumulate and be contained within sealed drainage when it is inside the buildings. Conversely this would indicate that containment zone D (site wide tertiary containment) does not include sealed drainage or impermeable surfacing in all areas. We feel it is reasonable to not dismiss the possibility of fire waters accumulating across the site yard during a fire incident, which means we will require a lot more information regarding how firefighting water is prevented from becoming an uncontrolled emission to the drainage system. Section 12.2.2 suggests valves and temp bungs may be removed/re-opened after a fire, however we cannot see were temp bungs and shut off valves have been mentioned elsewhere within the FPP.*

## **Section 8 – Other information**

### **Leak detection and prevention**

**75. Provide a detailed written description of your leak detection procedures and technological systems ensuring you include the following:**

- a. Details of any alarm and telemetry systems used to monitor tank volumes.**
- b. Details of measures used to ensure chemical or biological reactions are monitored within storage tanks.**
- c. Details of inspection and maintenance carried out on tanks to ensure their integrity.**

#### **Reason for question**

*On assessment of the application documents we cannot find any references to alarm and telemetry systems or how stored waste is monitored to ensure there are no chemical or biological activities taking place within the tanks. We also need to understand how the operators would preserve tank integrity through inspection and maintenance to prevent possible leaks and spillages.*

### **Site Address**

**76. Confirm the full site address (how you expect it to appear on the permit).**

#### **Reason for question**

*On assessment of the application forms we can see that the site address uses the site name 'Unit 1' and repeats the line St Michael's Close. This question seeks to clarify the site address is correct as operators often prefer to use an operational name (such as Elliott Environmental Drainage Centre, unit 1) in addition to the unit/building number.*

### **The Reception Pit**

**77. Provide evidenced based justification for the use of a reception pit as part of the activity to treat water based liquid waste.**

#### **Reason for question**

*On assessment of the application documents, you have indicated the site will use a reception pit to receive water based liquid wastes (both hazardous and non-hazardous). Sector Guidance Note IPPC S5.06 in*

*relation to Indicative BAT requirements for waste storage states “As a general rule, no open-topped tanks, vessels or pits should be used for storage or treatment of hazardous or liquid wastes. Exceptions would require justification in the permit application.” You will need to provide evidence-based justification for why you have chosen to incorporate a pit to store and treat liquid and/or hazardous wastes.*