

# SCHEDULE 5 RESPONSE - EPR/ZP3623LZ/A001

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

**Elliott Environmental Drainage Ltd**

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Waste, Planning & Environmental Consultants



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## Contents

<b>Document History:</b> .....	<b>i</b>
<b>Contents</b> .....	<b>ii</b>
<b>List of Appendices:</b> .....	Error! Bookmark not defined.
<b>Summary</b> .....	<b>4</b>
<b>1 Response to Question 1</b> .....	<b>5</b>
<b>2 Response to Question 2</b> .....	<b>5</b>
<b>3 Response to Question 3</b> .....	<b>5</b>
<b>4 Response to Question 4</b> .....	<b>5</b>
<b>5 Response to Question 5</b> .....	<b>5</b>
<b>6 Response to Question 6</b> .....	<b>6</b>
<b>7 Response to Question 7</b> .....	<b>6</b>
<b>8 Response to Question 8</b> .....	<b>6</b>
<b>9 Response to Question 9</b> .....	<b>9</b>
<b>10 Response to Question 10</b> .....	<b>9</b>
<b>11 Response to Question 11</b> .....	<b>9</b>
<b>12 Response to Question 12</b> .....	<b>9</b>
<b>13 Response to Question 13</b> .....	<b>9</b>
<b>14 Response to Question 14</b> .....	<b>10</b>
<b>15 Response to Question 15</b> .....	<b>10</b>
<b>16 Response to Question 16</b> .....	<b>10</b>
<b>17 Response to Question 17</b> .....	<b>10</b>
<b>18 Response to Question 18</b> .....	<b>11</b>
<b>19 Response to Question 19</b> .....	<b>11</b>
<b>20 Response to Question 20</b> .....	<b>12</b>
<b>21 Response to Question 21</b> .....	<b>12</b>
<b>22 Response to Question 22</b> .....	<b>12</b>
<b>23 Response to Question 23</b> .....	<b>12</b>
<b>24 Response to Question 24</b> .....	<b>13</b>
<b>25 Response to Question 25</b> .....	<b>13</b>
<b>26 Response to Question 26</b> .....	<b>13</b>
<b>27 Response to Question 27</b> .....	<b>14</b>
<b>28 Response to Question 28</b> .....	<b>14</b>
<b>29 Response to Question 29</b> .....	<b>15</b>
29.1 Physical/Mechanical treatment stage .....	15
29.2 Physico-chemical treatment stage .....	15
<b>30 Response to Question 30</b> .....	<b>16</b>
<b>31 Response to Question 31</b> .....	<b>16</b>
<b>32 Response to Question 32</b> .....	<b>17</b>

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<b>33</b>	<b>Response to Question 33</b> .....	<b>17</b>
<b>34</b>	<b>Response to Question 34</b> .....	<b>17</b>
<b>35</b>	<b>Response to Question 35</b> .....	<b>17</b>
<b>36</b>	<b>Response to Question 36</b> .....	<b>18</b>
<b>37</b>	<b>Response to Question 37</b> .....	<b>18</b>
<b>38</b>	<b>Response to Question 38</b> .....	<b>18</b>
<b>39</b>	<b>Response to Question 39</b> .....	<b>19</b>
<b>40</b>	<b>Response to Question 40</b> .....	<b>19</b>
<b>41</b>	<b>Response to Question 41</b> .....	<b>19</b>
<b>42</b>	<b>Response to Question 42</b> .....	<b>19</b>
<b>43</b>	<b>Response to Question 43</b> .....	<b>20</b>
<b>44</b>	<b>Response to Question 44</b> .....	<b>20</b>
<b>45</b>	<b>Response to Question 45</b> .....	<b>21</b>
<b>46</b>	<b>Response to Question 46</b> .....	<b>21</b>
<b>47</b>	<b>Response to Question 47</b> .....	<b>22</b>
<b>48</b>	<b>Response to Question 48</b> .....	<b>24</b>
<b>49</b>	<b>Response to Question 49</b> .....	<b>24</b>
<b>50</b>	<b>Response to Question 50</b> .....	<b>24</b>

## **Summary**

This document provides responses to the Notice of Request for Further Information (Schedule 5 Notice) issued by the Environment Agency (EA), dated 13/02/2026, requesting additional information for the permit application submitted for the site at Unit 1, St Michaels Close, Aylesford, Kent, ME20 7XE (application ref: EPR/ZP3623LZ/A001).

In addition to the queries raised within the schedule 5 response, the applicant would also wish to correct the postcode within application to that listed within this response document, ME20 7BU.

## **1 Response to Question 1**

1.1 The application fee of £30,577 has been paid using the same payment reference detailed on the F1 application form.

## **2 Response to Question 2**

2.1 Reference should be made to the updated Best Available Techniques (BAT) Assessment (document ref: 2499-002-M) which provides additional assessment for the Biological Treatment Activities, addressing the relevant points in BAT 33, BAT34, BAT35 and BAT 37.

## **3 Response to Question 3**

3.1 Please refer to the revised Process Flow Diagram and Non-technical summary, demonstrating step-by-step onsite operations.

## **4 Response to Question 4**

4.1 Reference should be made to Drawing No. 2499-002-03 within Appendix I for locations of pipeline/ducting transferring foul air between building 1 and 2 to maintain negative pressure in both buildings.

## **5 Response to Question 5**

5.1 Reference should be made to Drawing No. 2499-002-03 for locations of emission to air points for the carbon filter abated vents on the external tanks.

5.2 The Grid Reference for Emission Point A1 is TQ 74531 59104 (574531, 159104).

5.3 The Grid Reference for emission to air points for the carbon filter abated vents on the external tanks are as follows:

- A2 – TQ 74540 59091 (574540, 159091)
- A3 – TQ 74537 59089 (574537, 159089)
- A4 – TQ 74535 59088 (574535, 159088)
- A5 – TQ 74532 59086 (574532, 159086)
- A6 – TQ 74529 59084 (574529, 159084)
- A7 – TQ 74526 59082 (574526, 159082)
- A8 – TQ 74529 59080 (574529, 159080)
- A9 – TQ 74526 59079 (574526, 159079)
- A10 - TQ 74523 59078 (574523, 159078)

## **6 Response to Question 6**

- 6.1 Reference should be made to Drawing No. 2499-002-03 for the location of the sewer emission point and surface water emission point from uncontaminated roof and surface water. The downpipes within the site have been bunded.
- 6.2 The Grid Reference for the surface water (SW1) emission point to sewer is TQ 74434 59123 (574434, 159122).
- 6.3 The Grid Reference for Emission Point (S1) and Sampling Chamber is TQ 74520 59083 (574520, 159083).

## **7 Response to Question 7**

- 7.1 No unloading, processing or storage of waste will be undertaken outside of the buildings (this excludes the external tank area).

## **8 Response to Question 8**

- 8.1 The operator has confirmed that the following codes may occasionally have less than 80% w/w water content:
- 02 02 01

- 02 02 04
- 02 03 05
- 02 04 03
- 02 05 02
- 02 06 03
- 02 07 01
- 02 07 02
- 02 07 03
- 02 07 05
- 05 01 05
- 05 01 09
- 05 01 20
- 05 01 13
- 13 01 11
- 13 01 12
- 13 01 13
- 13 04 01
- 13 04 02
- 13 04 03
- 13 07 01
- 13 07 02
- 13 07 03
- 16 07 08

8.2 However, this is unlikely to be a routine occurrence. It should be considered that the primary function of the facility is the treatment of water-based liquid wastes containing solids and entrained or emulsified contaminants, which may include hydrocarbons.

8.3 Pre-acceptance procedures (as detailed under BAT 2 and supporting management plans) require detailed information on waste composition, including water and hydrocarbon content. This is supported by sampling and laboratory analysis to confirm suitability for treatment.

- 8.4 It is recognised that some wastes with elevated oil content (i.e. below the 80% water content threshold) may be accepted on a non-routine basis, for example where oils are present as a significant contaminant within an otherwise pumpable liquid waste. In such cases, the following controls would be applied by site management:
- Enhanced pre-acceptance assessment, including detailed compositional data and, where necessary, laboratory analysis to confirm that waste is compatible with the treatment process and can be effectively treated.
  - Wastes exhibiting characteristics of free-phase hydrocarbons, fuels, or clearly calorific wastes are not accepted for treatment.
- 8.5 As per the supporting process flow diagram and supporting documents, the treatment process within buildings 1 and 2 incorporates staged separation and removal (including physical, physico-chemical and biological treatment), enabling the removal of hydrocarbons from aqueous mixes. Where wastes present increased contamination, the plant allows for additional, controlled recirculation which can be undertaken to achieve the required treatment standard.
- 8.6 All treated effluent is directed to a buffer tank prior to discharge via the trade effluent consent. Discharge to sewer under the site's Trade Effluent Consent is only permitted following verification through sampling and analysis (including MCERTS-accredited methods) to confirm compliance with previously agreed limits. BAT based limits will also apply.
- 8.7 The above ensures that no effluent is discharged from the tanks unless it meets the required standards. Should a waste stream not be treated to the required standard and water contained within the buffer tank includes elevated contaminants which cannot be further removed, contingency measures are in place to remove the material off-site via tanker to a suitably licensed facility. However, this is unlikely to be required given the pre-acceptance procedures and associated controls.

## **9**      **Response to Question 9**

- 9.1      Water will be recirculated back into the G-MAX and reintroduced into the process.
- 9.2      This will be monitored within the on-site laboratory and spot check samples will be taken to ensure it is suitable to use the wash water. The purpose is to reduce the consumption of fresh water as the CDE reception plant uses a large volume of water up to 120m<sup>3</sup> per hour. This is responsible for washing the material on the screens of the plant via wash bars with nozzles.

## **10**     **Response to Question 10**

- 10.1     Recirculated water is not used to knowingly dilute waste streams introduced in to Building 2 via the reception pit or within the CDE hydro tip/G-Max. Incoming waste would be washed with reclaimed water so water will be added as this is required in the screening/ washing process.

## **11**     **Response to Question 11**

- 11.1     The site may undertake pre-mixing of compatible wastes i.e. those of a similar composition.

## **12**     **Response to Question 12**

- 12.1     The operator has confirmed that emergency loads will no longer be required at the site, therefore no requirement for an emergency buffer tank. The BAT assessment has been updated accordingly.

## **13**     **Response to Question 13**

- 13.1     Lime will be stored in stainless steel containers.

## **14 Response to Question 14**

14.1 Calcium hydroxide will be stored in stainless steel containers.

## **15 Response to Question 15**

15.1 Refer to revised Appropriate Measures assessment which includes an assessment of the biological waste treatment appropriate measures.

15.2 The previous assessment has been revised to fully address each relevant point of the non-hazardous and inert appropriate measures and chemical waste appropriate measures.

## **16 Response to Question 16**

16.1 Biological treatment may be undertaken within the external holding tanks (No. 1-5) and sludge storage tanks involving the introduction of micro-organisms to promote the aerobic process. The storage quantities and retention times for these tanks are detailed on the Site Layout Plan and Process Flow Diagram.

16.2 The micro-organisms added to the process will comprise EU80 which is a water-soluble powder for the biological breakdown of hydrocarbons contamination within soil and wastewaters, please refer to the Biosystems product information sheet for full details.

16.3 Each external tank (Holding Tank 1 – 5) will be fitted with gauges within the tanks to measure pressure, volume and temperature. Alarms will be fitted to measure low/ or high levels. The operator will be adding air via a compressor pump, the pump will feed air distributors, and the intensity will be able to be controlled via various valves.

## **17 Response to Question 17**

17.1 Please see revised list of EWC codes within the supporting documentation. The 99 codes are no longer required and have been removed from the proposed list of EWC codes.

## **18 Response to Question 18**

18.1 The EWC list has been amended, removing 99 codes. The only additional waste code from the previous submission comprises 16 01 04\*. The treatment methods are outlined within the response to Question 19 below.

## **19 Response to Question 19**

19.1 The additional waste code will include antifreeze wastes, which include glycol-based solutions containing dissolved organics, heavy metals and other residual suspended solids/oils. The treatment system is capable of addressing these components through the following mechanisms:

- Initial solids removal and clarification/neutralisation – removal of residual coarse solids and particulates, pH is adjusted following this step.
- Flocculation: Fine suspended solids and precipitated metals are removed, reducing turbidity and inorganic load.
- DAF (Dissolved Air Flotation) unit: Removal of oils, greases, and hydrophobic additives prior to storage in dedicated containers.
- Aerobic biological treatment: Glycols and other organics (including those which are water soluble) are degraded by micro-organisms, also reducing COD and organic load.
- Sludge management and final flocculation/centrifugation: Removed sludges from hazardous and non-hazardous streams are separated, flocculate and dewatered. The centrifugate removes solids, producing treated effluent suitable for discharge under the Trade Effluent Consent following storage and testing in the buffer tank.

## **20**     **Response to Question 20**

20.1     Please see revised list of EWC codes which have been separated according to each activity.

## **21**     **Response to Question 21**

21.1     Please see revised list of EWC codes which details throughputs associated with each activity. All liquid waste streams will encounter some form of biological activity from aeration with CO<sub>2</sub> to microbes and therefore the same throughputs have been assigned to the biological treatment activity as the physico-chemical treatment activity.

## **22**     **Response to Question 22**

22.1     The operator has confirmed that any pathogens and toxins encountered will be minimal. These may be encountered when processing material where there may be risk of Enterococci, Escherichia coli & Salmonella.

22.2     Where present on solid material they will be washed via spray bars which are equipped to the reception equipment. Once in liquid form these will be removed via sand filtration, the addition of air within storage tanks will ensure and prevent stagnation/dead zones. CO<sub>2</sub> will be used or chlorine (where required) will be added automatically and manually in building 1 or in the final water tanks where required.

22.3     Pathogen encounter should be minimal/moderate risk due to the waste streams accepted and processed at the facility. Onsite testing will be completed periodically to identify any pathogens and toxins to ensure that the correct treatment methods are utilised.

## **23**     **Response to Question 23**

23.1     Please see revised list of EWC codes with the previous code error corrected.

## **24**    **Response to Question 24**

24.1    Elliot Environmental Drainage Ltd confirm that no wastes will be accepted to act as process aids only.

## **25**    **Response to Question 25**

25.1    Metals will be removed via dosing, coagulation and flocculation, metals also have partial treatment removal via carbon and sand filter units.

## **26**    **Response to Question 26**

26.1    The following provides a summary of treatment measures and how they prevent dilution of wastes:

- Aeration/Separation Dilution Prevention
  - Physically removes substances rather than allowing it to mix further
  
- Physio chemical Dilution Prevention
  - Removes dissolved metals chemically
  - Achieves discharge limits without watering down concentration
  - Produces controlled hazardous sludge for disposal
  
- DAF Dilution Prevention
  - Targets emulsified fats/oil that cannot be removed by simple separation
  - Treats waste at full concentration before discharge
  - Eliminates need to dilute to meet oil limits
  
- Sludge removal Dilution Control
  - Extracted water is treated separately
  - Hazardous solids remain concentrated for controlled disposal

- Separation via centrifuge/ DAF.
  - Used to separate solids and liquids
  
- CO<sub>2</sub> treatment
  - Instead of adding water to reduce alkalinity, CO<sub>2</sub> chemically adjusts pH to discharge limits (typically pH 6–9).
  - This ensures compliance without artificially diluting contaminant concentrations.
  -
  
- Absorption via carbon and sand filters - Dilution Prevention
  - Removes/absorbs contaminants instead of masking them by dilution.

## **27 Response to Question 27**

27.1 The operator will have onsite capabilities to test the process throughout treatment at different stages of the treatment process. The operator will have specific probes such as PH probe to test each treatment step and ensure that they are maintained at optimal levels.

## **28 Response to Question 28**

28.1 The locations of chemicals and raw materials introduced into the treatment process have been detailed on the Site Layout Plan. These will comprise the following:

Dosing point location	Treatment method and Chemicals and/or Raw materials introduced
External holding tanks (1 – 5)	Air / micro-organisms (where required)
Clarification/neutralisation unit	Coagulant, polymer, pH correction, acids (Sodium Hypochlorite, Hydrochloric Acid and Sulphuric Acid) and alkali
Flocculation	Coagulant, polymer, pH correction, acids (Sodium Hypochlorite, Hydrochloric Acid and Sulphuric Acid) and alkali
Sludge tanks	Micro-organism, coagulant and polymer
Solids pile	Lime product

Dosing point location	Treatment method and Chemicals and/or Raw materials introduced
Final water tank 1	O3 (ozone treatment), CO <sub>2</sub> and pH correction

## **29 Response to Question 29**

### **29.1 Physical/Mechanical Treatment Stage**

29.1.1 At the reception stage within building 2, the mechanical treatment will separate sand, organics and hardcore waste materials.

### **29.2 Physico-chemical treatment Stage**

29.2.1 This stage will include clarification and PH balancing and clarification. The system can treat wastes across the full pH range (0–14) and adjusts the effluent to a target range of 6–10. Chemicals (as specified) for neutralisation are added as required to maintain this range.

29.2.2 In terms of particulate/solids removal, this is achieved via; the hydro tip screen for materials larger >4 mm, followed by Evo wash for smaller fractions (0–4 mm). Additional fines from the CDE reception equipment (0–63 µm) are removed prior to further treatment.

29.2.3 Conditions in the tanks will be maintained at ambient temperature, with no need for heating. Adequate aeration is present to sustain biological activity.

29.2.4 The Activated carbon filters and sand will be used as a final step to remove residual organics. The process is monitored by site management to ensure that they are replaced correctly.

29.2.5 The CO<sub>2</sub> treatment will remove harmful bacteria and lower pH levels.

29.2.6 Treated effluent is held in a buffer tank for verification against TEC limits. Only after MCERTS-accredited sampling confirms compliance is effluent discharged under the Trade Effluent Consent.

## **30 Response to Question 30**

30.1 The Dissolved Air Flotation (DAF) unit is designed to separate free and emulsified oils/greases from the aqueous feedstock as part of the overall treatment process. This is achieved through coagulation and flocculation, followed by flotation.

30.2 It is recognised by the operator that the nature and quality of the recovered oil will vary depending on the composition of incoming feedstock, with the treatment potentially altering the characteristics of the separated oil.

30.3 The operator will adopt a quality-based approach to the management of separated oils derived from the treatment process. Should the recovered oil fraction be of suitable quality, it may be sent offsite for further processing and recovery by suitably permitted third-party facilities.

30.4 However, it is acknowledged that, due to the variability of waste streams accepted at the site, the separated oil will not always be suitable for recovery. In such cases, the material will be classified and managed as a waste for disposal and transferred to a suitably licensed facility.

30.5 Recovery is more likely for lighter oil fractions, where more favourable physical characteristics allow for more effective treatment.

30.6 The onsite, MCERTS accredited laboratory will undertake sampling of the separated oil to determine its characteristics and inform the appropriate management route (i.e. recovery or disposal).

## **31 Response to Question 31**

31.1 The DAF unit is equipped with a white-water air system that will float off and separate grease and oil. Heavy sludges will fall to the bottom of the DAF and transferred via a pump to the relevant sludge tank, the remaining treatment water will go onto final water treatment tank.

## **32 Response to Question 32**

32.1 Separated oil and grease from the DAF unit are stored within 1,000 litre IBCs within building 1 on bunded stands as illustrated on the Site Layout Plan, the retention time for these prior to removal is considered to be 5 working days or they will be emptied for disposal as and when required depending on the incoming waste stream (whichever is sooner).

## **33 Response to Question 33**

33.1 The operator will not undertake the treatment of oils to produce an output oil which can be used as a fuel.

## **34 Response to Question 34**

34.1 The operator will not mix waste oils.

## **35 Response to Question 35**

35.1 The daily capacity for the repackaging activity within building 3 is 10 tonnes per day, whilst the hourly capacity for the amalgamated water based treatment process is 50m<sup>3</sup>.

35.2 As the process can run 24 h/day this equates to a daily capacity of 1200m<sup>3</sup> (i.e. 50 m<sup>3</sup>/h × 24 h = Up to 1200 m<sup>3</sup>/day).

## **36**     **Response to Question 36**

36.1     The volume of the inventory is assumed to be the volume of the primary containment.

The primary inventory volume is calculated to be 602m<sup>3</sup>, comprising the following:

- Outside bunded area with an inventory volume of 396 m<sup>3</sup> comprising:
  - Five large tanks of 54m<sup>3</sup> (Total volume 270m<sup>3</sup>)
  - Two water tanks 37m<sup>3</sup> (Total volume 74m<sup>3</sup>)
  - Two receptor tanks 26m<sup>3</sup> (Total volume 52m<sup>3</sup>)
  -
- Building 1 with an inventory volume of 206m<sup>3</sup> comprising:
  - Centrifuge water tank 25m<sup>3</sup>
  - Four sludge tanks of 25m<sup>3</sup> (Total volume 100 m<sup>3</sup>)
  - Treated water tank 25m<sup>3</sup>
  - Clarification/ settlement tank 20m<sup>3</sup>
  - Neutralisation tank 20m<sup>3</sup>
  - Flocculation unit 2 x 1,000l (1m<sup>3</sup>)
  - DAF 10m<sup>3</sup>
  - Waste oil storage 4 x 1,000l (4m<sup>3</sup>)

## **37**     **Response to Question 37**

37.1     Threshold checks will be in line with the trade effluent agreement in place for the site as well as BAT requirements (whichever is lower). These will be subject to testing within the onsite laboratory which will be MCERTS accredited.

## **38**     **Response to Question 38**

38.1     The operator will be storing aerosol containers but not treating or repackaging them.

38.2     The operator will not be mixing or decanting within Building 3, rather the area acts as a waste transfer activity, with materials bulked prior to onward removal from the site.

The operator will not accept waste that would produce external VOC release for the purpose of repackaging and therefore no designated LEV is required.

38.3 Any aerosols containers stored within building 3 will be vented and will not be stored for longer than 3 months.

38.4 The activity will only occur within the curtilage of Building 3 and not in the yard area.

38.5 The site does not undertake repackaging container wash out or crushing/shredding activities.

## **39 Response to Question 39**

39.1 Tankers will be washed out within the building 2 and into the reception pit and directed through the treatment plant. There will be tanker washout certificates for all wash outs undertaken at the site.

## **40 Response to Question 40**

40.1 The updated H1 Risk Assessment has been provided in response to this schedule 5 response. To confirm, waste code 16 01 10\* has been retained but now contains the correct description, which is not brominated related waste.

## **41 Response to Question 41**

41.1 Those undertaking sampling and analysis of emissions to water will be accredited to MCERTS.

## **42 Response to Question 42**

42.1 Sampling and analysis will be carried out in accordance with the following guidance:

- Surface water pollution risk assessment for your environmental permit
- Monitoring discharges to water: guidance on selecting a monitoring approach.

## **43**     **Response to Question 43**

43.1     Reference should be made to the updated Emissions Modelling Assessment (H1 Assessment of Air Emissions), document ref: 2499-002-I. The scope of the updated assessment was discussed with the EA. The updated assessment contains a discussion of potential emissions associated with biological treatment and treatment of water based liquid wastes with reference to the European Commission BAT Conclusions Document for Waste Treatment<sup>1</sup> and Best Available Techniques Reference Document for Waste Treatment.<sup>2</sup> The assessment includes justification for pollutants modelled and those excluded from the assessment along with justification for emission rates assigned in the model. These are based upon BAT based limits within the BAT Conclusions Document and emissions data within the BREF, where limits do not apply. The operator acknowledges that they will be required to meet the limits within BAT 34 and BAT 53. This will be achieved by dust filter and suitably impregnated carbon filters.

## **44**     **Response to Question 44**

44.1     See OMP (Doc Ref: 2499-002-D\_OMP\_v1.7) which has been revised to include details of other guidance documents i.e. *Biological waste treatment: appropriate measures for permitted facilities*.

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<sup>1</sup> COMMISSION IMPLEMENTING DECISION (EU) 2018/1147 Of 10 August 2018 Establishing Best Available Techniques (BAT) Conclusions For Waste Treatment, Under Directive 2010/75/EU Of The European Parliament And Of The Council.

<sup>2</sup> Best Available Techniques (BAT) Reference Document for Waste Treatment, European Commission, 2018.

## **45 Response to Question 45**

- 45.1 It should be observed that the proposed odour control unit (OCU) is designed to treat air extracted from Buildings 1 and 2, which comprise a largely enclosed process (i.e. storage tanks and pipes) areas operating at ambient temperature.
- 45.2 As such, the extracted air is not expected to contain significant levels of steam or saturated vapour, due to the lack of applied heat. High humidity conditions are therefore not anticipated.
- 45.3 The system has been specified in consultation with the technology provider, who has confirmed that dedicated dehumidification is not required for the expected air stream.
- 45.4 However, the above notwithstanding, a pre-filter stage is installed prior to the carbon beds. This will provide an initial screening stage and offer protection to the carbon media by removing particulates and moisture, thereby reducing the risk of fouling or premature saturation of the carbon filter system.
- 45.5 The system is fitted with a monitored control panel, including pressure drop indicators and alarms, which provide early warning of filter loading. These alerts will allow the operator to identify any potential issues associated with moisture and to take relevant action.
- 45.6 Furthermore, a programme of routine inspection and preventative maintenance, as described within the supporting management plans, will be implemented, including regular checks of the OCU system.

## **46 Response to Question 46**

- 46.1 The odour control unit (OCU) will serve both Building 1 and Building 2 via the ducting system designed to maintain negative pressure across internal processing areas. The system has been designed to ensure that air is continuously drawn into the buildings and directed towards the OCU, preventing release of odorous air.

- 46.2 Motorised control dampers will be installed within ductwork to enable active control and balancing of airflow between the two units. This will allow site management to adjust extraction rates in response to operational conditions, ensuring that negative pressure is maintained across both areas at all times.
- 46.3 During periods where waste is being received or handled within the reception area in Building 2, the system will prioritise extraction from the reception area. Airflow is to be automatically or manually adjusted via the motorised dampers to increase air extraction rates, thereby maintaining capture of odorous emissions.
- 46.4 Areas will operate under negative pressure at all times, with airflow rates adjusted to ensure sufficient air changes per hour while allowing the system to focus on areas whereby increased odour generation may be expected (i.e. waste reception area).
- 46.5 The combined system ensures that appropriate air changes per hour are maintained across both buildings, with the flexibility to redistribute airflow as required.

## **47 Response to Question 47**

- 47.1 The odour control unit (OCU) exhausts air via emission point A1 and has been designed and sized to treat extracted air from both Building 1 and Building 2 via a connected ducting system which is operated under negative pressure. The system ensures that odour emissions generated within both buildings is captured and conveyed to a single point of treatment, preventing uncontrolled releases.
- 47.2 The system maintains a consistent negative pressure across both buildings, ensuring that airflow is always directed towards the OCU. The ducted extraction system, combined with motorised dampers, ensures that odorous air from Building 2 is effectively drawn into the shared system and treated at the OCU in Building 1.
- 47.3 The OCU has been specified with a design capacity of approximately 25,000 m<sup>3</sup>.hour<sup>-1</sup>, which is sufficient to accommodate the combined air volumes from both buildings and maintain the required 5 air changes per hour.

- 47.4 The treatment system comprises a Nodour Hi-Flo twin-bed activated carbon unit, which includes a CX65 activated carbon media and particulate pre-filter. The pre-filter removes dust and particulates, protecting the secondary carbon media. The activated carbon provides adsorption of a wide range of odorous compounds, including hydrogen sulphide, ammonia, volatile organic compounds (VOCs), mercaptans/thiols and aldehydes/ketones.
- 47.5 Activated carbon adsorption is considered a well-established technique for the treatment of odorous air streams arising from waste treatment operations.
- 47.6 The system is designed to operate effectively across the anticipated range of air stream conditions (temperature 10–35 °C, relative humidity 40–80% as per the updated OMP), ensuring consistent performance for air extracted from both buildings.
- 47.7 Operational control is achieved through adjustable fan speeds and a monitored control panel, allowing site management to control airflow rates depending on site activities. This enables increased extraction from higher-risk areas (e.g. during waste reception in Building 2) when required.
- 47.8 The effectiveness of the OCU is further ensured through a comprehensive maintenance and monitoring regime specified in the OMP, which includes:
- routine inspection and replacement of pre-filters and carbon media;
  - pressure drop monitoring and visual indicators for filter condition;
  - periodic inspection of fans and ductwork; and
  - ongoing odour monitoring at the site boundary and periodic stack testing.
- 47.9 Based on the above design capacity, treatment technology and associated operational controls, the OCU at emission point A1 is considered fully effective in treating foul air extracted from both Buildings 1 and 2.

## **48**     **Response to Question 48**

48.1     See revised Fire Prevention Plan and associated CCTV Location Plan submitted in response to this schedule 5 request which details the location of all CCTV cameras and directional view. The levels of CCTV proposed ensures that all storage and processing areas are sufficiently covered and monitored outside of operational hours.

## **49**     **Response to Question 49**

49.1     See revised Fire Prevention Plan, section 8.3 which details alternative measures implemented at the site to negate the requirement for an automated detection system, this includes low storage volumes, nature of waste types stored, storage arrangements within sealed containers, low residence times, fire watches prior to cessation of works, operational 24 hours a day 6 days a week, external monitoring and the ability of the operator to attend the site within 15 minutes to assist the FRS etc.

## **50**     **Response to Question 50**

50.1     See revised Fire Prevention Plan, section 10.4 which details alternative measures implemented at the site to negate the requirement for automated suppression. The details and locations of fire extinguishers have been included on the layout plan; these are located within building 3 to ensure quick suppression during a potential fire event. A fire blanket is also detailed on the plan within building 3, this can be used to smother waste stored within skips to smother a fire.

