



Operating Techniques

Kemsley Fields Environmental Permit Variation Application

Countrystyle Recycling Limited

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SLR Project No.: 402.065070.00001

6 September 2024

Revision: Final V2

Basis of Report

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1.0 Introduction

Countrystyle Recycling Limited (CRL) has retained SLR Consulting Limited (SLR) to prepare an application to vary the Environmental Permit (EP) (Ref: XP3298HV) issued under the Environmental Permitting (England and Wales) Regulations (as amended) 2016 for the Kemsley Fields Business Park Materials Recycling Facility (MRF) site located at Kemsley Fields Business Park, Ridham Dock Road, Iwade, Sittingbourne, Kent, ME9 8SR.

This Operating Techniques (OT) document sets out best practice for operating the Site, based on legislation and best available techniques in the industry.

The site location is illustrated on Drawing 01, and the EP boundary and indicative site layout are illustrated on Drawing 02. Drawings 03 and 04 illustrate the site's environmental context.

This OT document should be read in conjunction with the following which is submitted in support of this EP variation application:

- EA Application forms, Parts A, C2, C4, and F1 and Supporting Information;
- Non-Technical Summary (NTS);
- Environmental (Amenity) Risk Assessment (ERA);
- Fire Prevention Plan (FPP);
- Odour Management Plan (OMP); and
- Associated Drawings.

CRL is fully conversant with its environmental responsibilities in relation to the site, and is fully committed to ensuring that its relevant facilities are designed, constructed and operated to the highest possible standards. It is intended that this will be clear from the detail contained within this OT.

1.1 Proposed EP Variation

This EP variation seeks to make the following changes to the EP:

- Regularisation of the EP boundary;
- Addition of a clinical waste transfer station (WTS) activity, including the storage of sharps and Absorbent Hygiene Products (AHPs) (offensive waste);
- Addition of further RDF baling operation, and associated plant;
- Storage of metal, glass, and hazardous glass waste in external storage bays;
- Acceptance, storage and bulking up of street sweepings;
- Food waste storage within the decommissioned compositing bio filter; and
- Addition of EWC codes.

CRL propose to increase the maximum quantity of waste accepted as part of activity A2 (RDF Production), as detailed in Table S2.3 of the EP from 160,000 tpa, to 180,000 tpa. There is no change proposed to the existing total annual tonnage (240,000 tpa) as a result of the EP variation application.

1.2 Site Location

The site is located approximately 2km east of Iwade in Sittingbourne, Kent. The site is accessed from Ridham Dock Road, situated approximately 1km south of Ridham Dock. The National Grid Reference (NGR) for the site is TQ 91957 67456 and the site location is



illustrated on Drawing 01. The indicative site layout and EP boundary is illustrated on Drawing 02.

The site is bounded to the west by a gypsum facility owned and operated by CRL, which is subject to an EP (Ref: EPR/DB3606LE), issued 21st December 2016 for the treatment and storage of gypsum waste. The Swale, a multi designated European and national site, lies 10m to the east and open land lies immediately to the north and south.

Table 1-1 below summarises the surrounding land uses.

Table 1-1 Surrounding Land Uses

Boundary	Description
North	Open land, and surface water features including drains and inlets from The Swale. Beyond this lies a pathway/track, followed by a commercial/industrial area.
East	The Swale and the Isle of Sheppey, followed by the Elmley National Nature Reserve.
South	Open land, and surface water features including drains and inlets from The Swale. This is followed by a Waste Water Treatment Works, and further commercial/industrial premises.
West	CRL's separately permitted gypsum treatment and storage facility lies immediately to the west, followed by Ridham Dock. Beyond this lies industrial units, Cold Harbour Marshes and the A249.

1.3 Report Structure

This report describes the operating techniques that will be implemented at the facility to ensure compliance with the conditions of the EP. The report has been drafted to satisfy the requirements of the Environment Agency (EA) and is divided into the following sections:

Section 1	Introduction
Section 2	General Management Appropriate Measures
Section 3	Accident Prevention and Management Plan
Section 4	Operations
Section 5	Waste Pre-Acceptance, Acceptance, and Tracking
Section 6	Waste Storage
Section 7	Waste Treatment
Section 8	Emissions Control
Section 9	Information

2.0 General Management Appropriate Measures

2.1 Management System

CRL operates an environmental management system accredited to ISO 14001 which will ensure that;

- The risks that the activities pose to the environment are identified;
- The measures that are required to minimise the risks are identified;
- The activities are managed in accordance with the management system;



- Performance against the management system is audited at regular intervals; and
- The EP is complied with.

The management system will be supplemented by this document which outlines the proposed operating techniques at the site and demonstrates conformance with the requirements of relevant and published EA Guidance.

2.2 Management Structure and Responsibilities

The Site Manager, working in conjunction with CRL's Compliance Team located at the site will be responsible for day to day operations and compliance with the EP.

Whenever the site is open to receive or dispatch wastes, or will carry out any of the waste management operations, it will be supervised by at least one member of staff who is suitably trained and fully conversant with the requirements of the EP regarding:

- Waste acceptance and control procedures;
- Operational controls;
- Maintenance;
- Record-keeping;
- Emergency action plans; and
- Notifications to the EA.

2.3 Technical Competence and Training

The site will be managed by sufficient staff, competent to operate the site. The management system will deliver the following:

- All staff will have clearly defined roles and responsibilities;
- Records will be maintained of the skills required for each post;
- Records will be maintained of the training and relevant qualifications undertaken by staff to meet the requirement of each post; and
- Operations will be governed by standard operating instructions.

Operations at the site will be under the overall control of a technically competent person who holds the relevant Certificate of Technical Competence (COTC) under the Waste Management Industry Training and Advisory Board (WAMITAB) scheme.

An assessment of staff training needs will be carried out to identify the posts for which specific environmental awareness training is needed, and to determine the scope and level of such training. The assessment of training needs will be reviewed on an annual basis.

The training programme will ensure that relevant staff are aware of the following:

- Regulatory implications of the permit for the site and their specific work activity;
- All potential environmental effects from operations under normal and abnormal circumstances;
- The need to report deviations from the permit; and
- Prevention of accidental emissions and the action to be taken should accidental emissions occur.

A copy of this OT and the EP will be made available at the facility for the attention of all staff. They will be informed of the importance of these documents and the key areas of concern, and fully briefed on the role of the EA in enforcing compliance.



2.4 Site Security

In order to prevent unauthorised access, a number of site security measures are in place at the site including;

- The site is manned 24 hours/7 days a week via site staff or a security service who will undertake regular inspections of the site;
- An internal and external CCTV monitoring system which can be monitored remotely; and
- A 2.4m high steel palisade security fence.

Any visitors to the site (other than those delivering waste) will be required to report to the site office on arrival and to sign the visitor's book.

The site will be visually inspected at the commencement of each working day. Any defects or damage which compromise the integrity of the enclosure will be made secure by temporary repair by the end of the working day. Permanent repairs will be affected as soon as practicable.

All inspections, any defects, damage or repairs will be recorded in the site diary.

2.5 Facility Decommissioning

The site will require a simple decommissioning consisting of the mechanical and electrical removal of all plant and equipment and the deconstruction of the fire walls. There will be no subsurface tanks or pipework, drains or potentially dusty insulation to remove.

The decommissioning plan will demonstrate that:

- The plant can be decommissioned without causing pollution; and
- The site will be returned to a satisfactory state.

2.5.1 Permit Surrender

To assist any future permit surrender, records will be maintained to demonstrate how the land beneath the site has been protected at all times between the date of permit issue and the end of permit operations.

Records to be maintained will include:

- Maintenance of impermeable surfacing;
- Maintenance of drains and sumps; and
- Actions taken to clean up incidents and spillages.

2.6 Display of Environmental Permit

A copy of the EP will be kept available for reference by all staff and contractors whose work may have an impact on the environment.

2.7 Managing Documentation and Records

Controls will be in place to ensure that all documents are issued, revised and maintained in a consistent fashion.

The documents that will be included within the scope of the controls are as follows:

- Policies;
- Responsibilities;
- Targets;
- Maintenance records;



- Procedures;
- Monitoring records;
- Results of audits;
- Results of reviews;
- Complaints and incident records; and
- Training records.

Records will be made and kept up to date on a daily basis to reflect deliveries, on-site treatment and dispatches. All records relating to waste acceptance will be maintained and kept readily available at the Kemsley Fields site and kept for a minimum of 2 years after the waste has been removed off site.

2.8 Reporting Non-Compliance and Taking Corrective Action

Procedures will ensure appropriate corrective action is taken in response to problems identified at the site. The procedure will ensure that non-conformances are reported, investigated and rectified, and that failures and weaknesses are prevented. The following aspects will be considered:

- Actual or potential non-compliance;
- System failure discovered at internal audit;
- Suppliers or subcontractors breaking the agreed operating rules;
- Incidents, accidents, and emergencies;
- Malfunction, breakdown or failure of plant;
- Other operational system failure; and
- Complaints.

The action taken in response to the non-conformance may include:

- Obtaining additional information on the nature and extent of the non-conformance;
- Discussing and testing alternative solutions;
- Modifying procedures and responsibilities;
- Seeking approval for additional resources and training; and
- Contacting suppliers and contractors (as applicable).

2.9 Auditing and Legal Compliance

There will continue to be a formalised internal auditing procedure to ensure the facility is audited at defined intervals and that the progress of corrective and preventative action is monitored.

2.10 Monitoring, Measuring and Reviewing Environmental Performance

A formalised management structure review environmental performance, and ensure any necessary actions are taken.

2.11 Operational Control, Preventative Maintenance and Calibration

The management system will complement operational procedures so as to ensure effective control of site operations, the use of approved suppliers and contract services, the maintenance of operational equipment and the calibration of monitoring equipment.



All plant and equipment will be subject to a programme of planned preventative maintenance which will follow the inspection and maintenance schedule recommended by the manufacturer.

2.12 Design and Construction Quality Assurance

All relevant elements of the site will be designed in accordance with recognised standards, methodologies and practices.

The design process will use a risk-based approach and will be appropriately documented using drawings, specifications and method statements to provide an adequate audit trail.

Construction Quality Assurance (CQA) plans will govern all construction activities necessary in the future. These CQA plans will be prepared by competent and suitably qualified persons.

A competent and suitably qualified person will supervise the construction activities, and prepare a validation report confirming that the key construction activities have been carried out in accordance with the QQA plan.

3.0 Accident Prevention and Management Plan

CRL recognises the importance of the prevention of accidents that may have environmental consequences and that it is crucial to limit those consequences.

An accident management plan will be implemented and maintained at the site to ensure the site and site staff are fully prepared for any such incidents. The accident management plan will be reviewed at least every four years or as soon as practicable after an incident, with changes made accordingly to minimise the risk of occurrence.

The Site Manager is responsible for managing accidents on site and ensuring the plan is understood by all site operatives.

Up to date records of all accidents, incidents, near misses, changes to procedures, abnormal events and findings of maintenance inspections will be kept within the site diary.

The accident management plan describes the techniques that will be implemented to minimise the risks posed to the environment. Activities affecting the health and safety (H&S) of operatives, contractors and visitors will be separately managed in compliance with H&S regulation and company H&S Policy.

3.1.1 Hazard Identification

The following hazards were identified in the Environmental Risk Assessment that was prepared using EA methodology¹ and has been submitted in support of this EP variation application (reference 402.065070.00001/ERA, dated December 2023):

- Unauthorised waste;
- Fire;
- Loss of containment - spillage and leakage;
- Security and vandalism; and
- Flooding.

¹ [Risk assessments for your environmental permit - GOV.UK \(www.gov.uk\)](https://www.gov.uk)



The following sections summarise the measures necessary to minimise the potential causes and consequences of accidents, as detailed in the Environmental Risk Assessment.

3.1.2 Unauthorised Waste

Acceptance of unauthorised materials could result in unacceptable wastes being stored and treated at the site.

Upon delivery waste will continue to be subject to strict WAP to identify, reject and/or segregate potentially non-conforming waste.

Only waste authorised by the EP is accepted at the site.

All wastes are subject to inspection and checking against the declaration on the waste transfer note.

In the event that unauthorised waste is delivered to the site, the waste will be segregated and stored in a designated quarantine area prior to export from site.

Non-Conforming materials handpicked from the load shall be placed in the identified quarantine area and removed from the facility in accordance with the EP (within 7 days) and treated as waste.

3.1.3 Fire

CRL have updated the previously accepted Fire Prevention Plan (FPP) to reflect the changes proposed in this EP variation.

The updated FPP is included as part of the EP variation application.

3.1.4 Loss of Containment

Loss of containment could lead to spillage and leakage of potentially contaminating liquids. To prevent loss of containment and minimise the risk and impact of releases the following measures will be implemented:

- *Containment system:* any facilities for the storage of oils, fuels or chemicals will be sited above ground on impervious bases and surrounded by impervious bund walls. The volume of the bunded compound will be at least the equivalent to the capacity of the tank plus 10%. All filling points, vents and gauges will be located within the bund.
- *Storage vessels:* storage tanks will be constructed to the appropriate British Standard;
- *Inspection:* tanks will be inspected visually on a daily basis by the site staff to ensure the continued integrity of the tanks, and identify the requirement for any remedial action;
- *Spill kits:* materials suitable for absorbing and containing minor spillages will be maintained on site; and
- *Monitoring techniques:* the site staff will undertake daily monitoring for evidence of spillage and leakage.

In the event of any potentially polluting leak or spillage occurring on site, the following action will be taken:

- Minor spillages will be cleaned up immediately, using sand or proprietary absorbent. The resultant materials will be placed into containers and will then be removed from site and disposed of at a suitably permitted facility. The incident will be logged in the site diary.
- Any dry wastes spilled on site will be collected and transported to the appropriate area of the site.
- In the event of a major spillage, which is causing or is likely to cause polluting emissions to the environment, immediate action will be taken to contain the spillage and prevent liquid from entering surface water or drains. The spillage will be cleared immediately and placed in containers for offsite disposal, and the EA will be informed.



3.1.5 Security and Vandalism

The following security measures in place:

- The site is manned 24 hour/7 days a week via site staff or a security service who will undertake regular inspections of the site;
- An internal and external CCTV monitoring system which can be monitored remotely; and
- A 2.4m high steel palisade security fence.

Inspection: gates and fencing extending around the site will be inspected regularly by the operations staff to identify deterioration and damage, and the need for any repairs;

Maintenance and repair: fencing and gates will be maintained and repaired to ensure their continued integrity. In the event that damage is sustained repairs will be made by the end of the working day. If this is not possible, suitable measures will be taken to prevent any unauthorised access to the site and permanent repairs will be affected as soon as practicable;

Authorised access system: all visitors to the site will be required to register in the visitor's book and sign out again on exit to minimise the risk of unauthorised visitors being present on site; and

Monitoring techniques: operational procedures, including regular inspections will ensure continual monitoring of security provision at the site.

In the event of a breach of security at the site, the cause will be investigated and appropriate mitigation measures implemented. Records to be maintained to include inspections and maintenance of security fencing and gates, breaches of security, investigations and actions taken.

3.1.6 Flooding

There are no surface water features within the site boundary.

According to EA flood maps, the site lies within a flood zone. Therefore, a flood evacuation plan has been implemented at the site to reduce the risk and minimise the potential impact of flooding.

EA information regarding flood defences in the area confirms that the site is adequately defended from a present day 0.5% annual exceedance probability (AEP) tidal flood event.

3.2 Contingency Plans and Procedures

The site will implement a contingency plan to ensure that the following are achieved:

- Compliance with all EP conditions and operating procedures during maintenance or shutdown at the site, including disruption at other facilities that would affect supplies to the site or the removal of waste from it;
- No exceedance of limits in the EP and that appropriate measures for storing and handling waste are continued to be applied; and
- Cessation of waste acceptance unless there is a clearly defined method of recovery and enough permitted capacity on site.

4.0 Operations

The total annual capacity for the facility is 245,000 tonnes per annum (tpa) as detailed in the EP. The treatment and transfer processes are described in full below.

The following changes are proposed on site:



1. Regularisation of the EP boundary;
2. Addition of a clinical waste transfer station (WTS) activity, including the storage of sharps and Absorbent Hygiene Products (AHPs) (offensive waste);
3. Addition of a further RDF baling operation, and associated plant;
4. Storage of metal, glass, and hazardous glass waste in external storage bays;
5. Acceptance, storage and bulking up of street sweepings;
6. Food waste storage within the decommissioned composting bio filter; and
7. Addition of EWC codes.

CRL propose to increase the maximum quantity of waste accepted as part of activity A2 (RDF Production), as detailed in Table S2.3 of the EP from 160,000 tpa, to 180,000 tpa. There is no change proposed to the existing total annual tonnage (240,000 tpa) as a result of the EP variation application.

Full details of the proposed changes to the EP can be found in the NTS.

The amendments to the site layout are illustrated on Drawing 02: Site Layout and Waste Storage.

4.1 Dry Mixed Recyclables Material Recovery Facility (MRF)

CRL operate a dry mixed recyclables (DMR) MRF on site, the location of which is illustrated on Drawing 02.

Treatment at the DMR MRF consists of manual sorting, separation, screening, baling, shredding and compaction of waste into different components for recovery/recycling.

The MRF consists of a bag splitter, trommel, picking lines, over band magnet and baler.

The description of the activities to produce (RDF) are as follows:

- R13: Storage of wastes pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced);
- R3: Recycling/reclamation of organic substances which are not used as solvents;
- R4: Recycling/reclamation of metals and metal compounds; and
- R5: Recycling/reclamation of other inorganic materials.

The site is permitted to accept 40,000 tpa of the waste types detailed within Table S2.2 of the EP, for treatment at the MRF.

As part of this EP variation application it is proposed to include an additional RDF baling operation, and associated plant, outside of the building immediately to the west. All material storage, and processing will continue to be undertaken on impermeable surfacing with sealed drainage. The location of the external baling activity and baling equipment is illustrated on Drawing 02.

4.2 Refuse Derived Fuel (RDF) Production

The RDF waste reception building is equipped with two roller shutter doors for entrance and exit. Standard operating predominantly see's the southern entrance door being used but, in the case of operational issue, the northern entrance door can be used as an alternative.

Residual waste is delivered in a number of vehicles including RORO lorry, dustbin lorry or walking floor artic lorry. Before discharging into the shed, delivery vehicles wait in the yard sheeted. They are then called forward one at the time and back into the reception building.



On discharge the vehicle will pull forward and allow the waste to be pushed up with a loading shovel. The delivery vehicle will then head back to the weighbridge.

This residual material is processed through the on-site bale and wrap operation. A 360° excavator loads the shredder, which discharges onto a conveyor leading to a baler. Metal is removed by an electromagnet before reaching the baler and being sent for recycling. The baler discharges 1.5m³ bales weighing around 1.3tonnes, which are wrapped and labelled before being stocked in the yard using a clamp truck. As part of this EP variation application it is proposed to add an additional RDF baling operation, outside of the building, immediately to the west.

The site will store up to 4,800 bales (RDF and baled recyclates) at any one time. The bales will be stored as shown on Drawing 02.

This area benefits from contained drainage leading to either pin drains or a sump, which pumps into storage tanks. Bales are colour coded to ensure effective stock management, any holes are patched and if this is not effective, they are re-wrapped. Bales are removed from site on curtain siders using clamp trucks to load. Before leaving the load is inspected for damage, bales are repaired as required, and then the lorry is sheeted and dispatched via the weighbridge.

The description of the activities to produce (RDF) are as follows:

- R3: Recycling/ reclamation of organic substances which are not used as solvents;
- R4: Recycling/ reclamation of metals and metal compounds;
- R5: Recycling/ reclamation of other inorganic substances; and
- R13: Storage of wastes pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced).

4.3 Transfer of Green Waste

The site is currently permitted to accept and store green waste on site, as illustrated on Drawing 02. The site is permitted to accept up to 15,000 tpa of green waste.

Green waste is stored in a bay constructed of concrete frames / blocks with litter netting to the rear (being the area of the site that is bounded by a site boundary with the adjacent SSSI/Ramsar site). Green waste is not stored for longer than 72 hours. The green waste storage area benefits from impermeable surfacing and a sealed drainage system. The green waste in the storage area does not exceed 100 tonnes at any given time and meets the incoming Waste Acceptance Criteria set out in Appendix OT1.

4.4 Waste Transfer of Comingled Green and Food Waste

CRL accepts up to 30,000 tpa of waste that was previously destined for treatment through the IVC (to be split as to 15,000 tpa of green waste and 15,000 tpa of food/comingled food & green waste).

Food/comingled food & green waste is stored in a dedicated bunker inside the main RDF building before being transferred off-site to a suitably licensed facility. In addition, the decommissioned composting bio filter will be repurposed to provide a further covered food storage container. The food storage locations are illustrated on Drawing 02. There is no treatment of this waste on site.

The description of the activities for the food/comingled food & green waste storage are as follows;

- R13: Storage of wastes pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced; and



- D15: Storage pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where it is produced).

4.5 Acceptance and Storage of Aqueous Liquid Waste

CRL provide surface water tankering services to companies operating in the Kemsley Fields Business Park and the surrounding area. These services relate to the removal of non-hazardous aqueous liquid waste from lagoons and collection points such as weighbridge catch pits. During normal services, CRL provide a transfer service for such aqueous waste directly from the producer to a suitable sewerage treatment plant. However, during periods of high precipitation and during out of hours operation of sewerage treatment plants it is necessary to store collected aqueous liquid waste collected from producer sites where verification of the wastes compliance with 16 10 02 waste code has been provided by the producer. The aqueous liquid waste is transferred to site and stored prior to transfer off site to a suitably licensed facility.

Up to 5,000tpa of aqueous liquid wastes, is accepted on site. On receipt of the tankered aqueous liquid waste onto site, it is transferred and stored within a dedicated 600m³ storage tank on site before being tested and then removed for treatment at an appropriate off-site treatment facility. The location of the tank is detailed on Drawing 02.

The acceptance and storage of aqueous liquids requires the following recovery and disposal codes:

- R3: Recycling/reclamation of organic substances which are not used as solvents (including composting and other biological transformation processes)
- R5: Recycling/reclamation of other inorganic materials

4.6 Use of Former IVC Sanitation Tunnels for Storage of Loose and Baled Dry Recyclables

The former IVC sanitation tunnels are used for the storage of loose and baled dry recyclables in connection with the dry recyclables MRF.

Drawing 02 illustrates the location of the 6 former IVC sanitisation tunnels that are used for the storage of loose dry recyclables prior to processing within the DMR MRF building. The tunnels are also used to store baled recyclates prior to transfer from site for further recycling.

Tunnels numbered 4 & 5 will have roller shutter doors fitted to the outside to allow the access of forklifts to and from the tunnels for the loading of baled recyclates onto vehicles for onward transfer from the areas shown on Drawing 02.

Tunnels numbered 1, 2, 3 & 6 retain the canvas and concrete 'L' frame coverings as currently in place thereby providing a sealed end to each tunnel to prevent wind-blown litter escaping from the tunnels.

All entrances to the tunnels inside the former IVC building are open to allow access for moving material for sorting or baling as appropriate. The FPP for the MRF operation within the former IVC building allows for a sprinkler system to be fitted to the entire building and to each of the 6 x former sanitation tunnels.

4.7 Storage of Metals, Glass, and Hazardous Glass Waste

CRL store metals and glass arising from its operations on site (primarily from the production of RDF bales and plasterboard recycling operations) and externally accepted metals and glass prior to transfer off site for onward recycling.



The storage location of scrap metal and glass is detailed in Drawing 02. As part of the EP variation, CRL propose to use bays 1, 2, 3, 4, and 5 in the north western area of the site for flexible scrap metal and glass storage, outside. Metals and glass are stored in bunkers separated by concrete blocks and/or frames.

CRL propose to accept source segregated, single stream, hazardous glass waste under EWC code 19 12 11* for storage and bulking up only. There would be no treatment of hazardous glass on site. When accepted, hazardous glass waste would be stored within Bay 2 which will be fully sealed and covered with tarpaulin to minimise the generation of run off. Any run off arising would be contained, and collected within the bay prior to removal from site along with the glass waste.

The acceptance, storage, and transfer of metals requires the following disposal code:

- D14: Repackaging prior to submission to any of the operations numbered D1 to 13;

4.8 Street Sweepings

CRL propose to accept street sweepings (20 03 03 Street Cleaning Residues) from across Kent for storage and bulking up only. There is no proposed treatment of street sweepings. When accepted, street sweepings will be deposited within Bay 1 in the flexible north western area of the site as illustrated on Drawing 02. The bay will be fully sealed and covered with tarpaulin to minimise the likelihood of the generation of run off. Any potentially contaminated process water arising from this waste would be fully contained within the bay, and wholly removed from site along with the street sweepings upon bay emptying. No more than 150 tonnes of street sweepings will be stored on site at any one time, and the waste will typically be stored for 24 hours (maximum 3 days). The bay will be fully emptied, and cleaned before further street sweepings are accepted. As Bay 1 is part of flexible storage on site, should the bay be required for alternative permitted wastes (metals, glass etc) then a full bay clean will be carried out and any liquid wash down arising would be sucked up and removed from site to a suitable facility for further treatment or disposal. When removed from site, street sweepings will typically be transported to Veolia at Pitsea or other suitably permitted facilities for further recovery/disposal.

The proposed site layout is illustrated on Drawing 02.

4.9 Clinical WTS Activity – Proposed EP Activity A9

As part of the EP variation application CRL propose to vary Table S1.1 of the EP to add the clinical WTS activity as summarised in Table 4-1 below to allow the acceptance, storage, and bulking up of AHPs and sharps (offensive/clinical waste) on site. There will be no treatment of offensive waste on site, and the waste will be stored within designated bays, inside the building which benefits from impermeable surfacing and a sealed drainage system.

Table 4-1 EP Table S1.1 Proposed Additional Waste Activity

Activity Reference	Description of activities for waste operations	Limits of activities
<p>A9 Clinical WTS</p>	<p>R3: Storage of waste pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced)</p>	<p>The amount of hazardous waste stored on site at any one time shall not exceed 50 tonnes.</p>



Activity Reference	Description of activities for waste operations	Limits of activities
	D15: Storage pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection on the site where the waste is produced)	Waste shall be stored on impermeable surfacing with sealed drainage. Infectious clinical waste and non-infectious clinical offensive waste shall be stored for no longer than 14 days. Odorous or biodegradable waste must be stored securely for no longer than 14 days.

To facilitate the addition of the clinical WTS operation, the changes to the EP as described in the below sections are proposed.

4.9.1 Site Layout Development

As part of the addition of the Clinical WTS Activity, offensive/clinical waste including AHPs and sharps, will be accepted and stored within repurposed designated bays inside the existing C & D/C & I MRF building as illustrated by bays 7a and 7b on Drawing 02.

4.9.2 Addition of EWC Codes

It is proposed that the following additional EWC codes detailed in Table 4-2 below, are added to the site's EP in relation to the proposed clinical WTS activity. The additional EWC codes will be accepted for storage and bulking up only.

Table 4-2 Proposed Additional EWC Codes for Clinical WTS Activity

EWC Code	Description
09	WASTES FROM THE PHOTOGRAPHIC INDUSTRY
09 01	Wastes from the photographic industry
09 01 01*	Water-based developer and activator solutions ²
09 01 02*	Water-based offset plate developer solutions ²
09 01 03*	Solvent based developer solutions ²
09 01 04*	Fixer solutions ²
09 01 05*	Bleach and bleach fixer solutions ²
09 01 07	Photographic film and paper containing silver or silver compounds ²
09 01 08	Photographic film and paper free of silver or silver compounds ²
18	WASTES FROM HUMAN OR ANIMAL HEALTHCARE AND/OR RELATED RESEARCH (EXCEPT KITCHEN AND RESTAURANT WASTES NOT ARISING FROM IMMEDIATE HEALTH CARE)

² This is limited to wastes of this type arising from medical practices or associated research activities.



EWC Code	Description
18 01	Wastes from natal care, diagnosis, treatment or prevention of disease in humans
18 01 01	Sharps (except 18 01 03)
18 01 03*	Wastes whose collection and disposal is subject to special requirements in order to prevent infection (e.g. dressings, plaster casts, linen, disposable clothing, nappies)
18 01 04	Wastes whose collection and disposal is not subject to special requirements in order to prevent infection
18 01 06*	Chemicals consisting of or containing hazardous substances
18 01 07	Chemicals other than those mentioned in 18 01 06
18 01 08*	Cytotoxic and cytostatic medicines
18 01 09	Medicines other than those mentioned in 18 01 08
18 01 10*	Amalgam waste from dental care
18 02	Wastes from research, diagnosis, treatment or prevention of disease involving animals
18 02 01	Sharps (except 18 02 02)
18 02 02*	Wastes whose collection and disposal is subject to special requirements in order to prevent infection
18 02 03	Wastes whose collection and disposal is not subject to special requirements in order to prevent infection
18 02 05*	Chemicals consisting of or containing hazardous substances
18 02 06	Chemicals other than those mentioned in 18 02 05
18 02 07*	Cytotoxic and cytostatic medicines
18 02 08	Medicines other than those mentioned in 18 02 07
20	MUNICIPAL WASTES (HOUSEHOLD AND SIMILAR COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL WASTES) INCLUDING SEPARATELY COLLECTED FRACTIONS
20 01	Separately collected fractions (except 15 01)
20 01 31*	Cytotoxic and cytostatic medicines
20 01 32	Medicines other than those mentioned in 20 01 31
20 01 99	Other fractions not otherwise specified (consisting of nappies and absorbent hygiene products (AHPs) only)

CRL also propose to add the following EWC code detailed in Table 4-3 below, for storage and bulking up only.

Table 4-3 Proposed Additional EWC Codes for Bulking Up Only

EWC Code	Description
19	WASTES FROM WASTE MANAGEMENT FACILITIES, OFF-SITE WASTE WATER TREATMENT PLANTS AND THE PREPARATION OF



EWC Code	Description
	WATER INTENDED FOR HUMAN CONSUMPTION AND WATER FOR INDUSTRIAL USE
19 12	Wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified
19 12 11*	Other wastes (including mixtures of materials) from mechanical treatment of waste containing hazardous substances
20	MUNICIPAL WASTES (HOUSEHOLD AND SIMILAR COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL WASTES) INCLUDING SEPARATELY COLLECTED FRACTIONS
20 03	Other municipal wastes
20 03 03	Street-cleaning residues

4.10 Waste Reception, Treatment, and Storage

All solid waste acceptance, treatment and storage will take place on areas of impermeable surfacing with sealed drainage.

The site will continue to accept up to 245,000 tpa in total.

Waste quantities are currently detailed within Schedule 2 of the EP. It is proposed that the individual waste activity amounts accepted on site are as detailed below;

- Green waste transfer: 15,000 tpa;
- Comingled Green and Food Waste and Food Waste transfer: 15,000 tpa;
- RDF production & Non-Hazardous Transfer and Treatment - 180,000 tpa
- Hazardous Waste Transfer - 10,000 tpa
- Dry recyclable MRF: 40,000 tpa
- Aqueous Liquid Waste: 5,000tpa

4.11 Hours of Operation

The facility will continue to be open to receive wastes in line with the current planning permission.

4.12 Site Infrastructure and Equipment

4.12.1 Site Identification Board

A site identification board which is easily readable from outside the entrance during hours of daylight is provided at or near the main site entrance.

The identification board is inspected at least once per week. In the event of damage or defect that significantly affects the legibility of the board it will be repaired or replaced within a timescale agreed with the EA.

The board displays the following information:

- Site name and address;
- Permit holder;
- Permit number (s);
- Emergency contact name and telephone number;



- EA national telephone numbers; and
- Days and hours site is open to receive waste.

4.12.2 Plant and Equipment

The following items of plant and equipment are held on site from time to time dependant on the waste stream being processed on site. It should be noted that this is not a fixed list of plant and maybe subject to change;

- METSO ETA pre-shred 4000S Static Shredder;
- Overband magnet;
- Cross Wrap CW-D-2200-LW-750-1-10 Wrapping Line.
- Mobile plant as detailed in including shovels, materials handling equipment, telehandlers and clamp/tele-trucks.
- MRF equipment.

Additional plant and equipment including, but not limited to, water bowser, spray equipment and road sweeper are made available as required.

All items of plant and equipment used on site are maintained in accordance with manufacturer's recommendations.

4.12.3 Plant Maintenance

All maintenance audits and monitoring will be carried out in accordance with the manufacturer's specifications which are kept in the site office or available online.

CRL will take a proactive approach involving a planned preventative maintenance program for the site. A Maintenance Checklist will allow all site operatives to actively take part in the site's maintenance schedule.

The checklist is completed and maintained by the Site manager, with the following information compiled:

- The item that requires maintenance;
- How often maintenance needs to be carried out (daily, weekly, monthly or yearly);
- A record of any particular maintenance instructions; and
- Who on site is responsible for each maintenance check.

The checklist ensures that all site operatives are aware of their particular responsibilities for maintenance checking. The Site Manager ensures that all site operatives are aware of any amendments and additions to the checklist.

When a maintenance issue is dealt with, a maintenance record form is completed for each separate piece of equipment or infrastructure. The record form will include the following information to be recorded:

- The item requiring maintenance;
- The frequency of the required maintenance;
- Completed date and who carried out by; and
- Any particular comments.

The record forms will be kept in the site office to ensure there is access for all site operatives to the records.

In the event that plant replacement is required, CRL will choose new plant with the lowest emission standard available at the time of purchase.



The following control measures will be in place to reduce as much as possible during operations:

- Use of low sulphur fuel;
- Mobile plant to be switched off when not in use to avoid idling; and
- Planned, preventative maintenance schedule to be rigidly followed to avoid the operation of poor performing or inefficient plant.

5.0 Waste Pre-Acceptance, Acceptance, and Tracking

Strict WAP will be followed at the site to ensure that the site only accepts waste that is:

- Suitable for the activity;
- Allowed by the EP; and
- Appropriately considered by the ERA.

The WAP will also assist with:

- Ensuring the activities do not cause pollution;
- The waste sourcing decision making process; and
- Preventing the receipt of non-permitted wastes.

5.1 Waste Pre-Acceptance

The site will implement strict waste pre-acceptance procedures to ensure that enough is known about a waste (including its composition) before it arrives at the site. The procedure is required to assess and confirm that the waste is technically and legally suitable for acceptance. The procedure will follow a risk-based approach considering:

- The source and nature of the waste;
- Potential risks to process safety, occupational safety and the environment (for example from odour and other emissions); and
- Knowledge about the previous waste holder(s).

The objective of the waste pre-acceptance procedure is to evaluate customer information at the enquiry stage to determine whether the waste could be accepted at the site.

The waste producer/holder will be required to send the necessary waste characterisation information to CRL in advance of delivery of waste materials to the site.

This information enables CRL to determine whether the waste stream can be accepted at the site.

No waste will be accepted at the site unless the necessary characterisation information has been received in advance and approved for receipt.

Both new and existing customers will be required to provide characterisation information for each new waste stream.

Enquiries for new waste streams proposed for acceptance at site will be managed by CRL who will ensure that the waste has been properly assessed and classified in line with WM3³.

³ [Waste classification technical guidance - GOV.UK \(www.gov.uk\)](https://www.gov.uk)



The site management will ensure that the following waste characterisation information is obtained:

- Details of the waste producer including their organisation name, address and contact details;
- A description of the waste;
- The waste classification code;
- The source of the waste (the producer's business and the specific process that has created the waste);
- Information on the nature and variability of the waste production process;
- The waste's physical form;
- A description of the waste's odour and whether it is likely to be odorous; and
- An estimate of the quantity expected to be received in each load and in a year.

Following classification in line with WM3, the waste will be technically assessed to ensure it is suitable for acceptance and storage on site, and meet EP conditions.

Waste pre-acceptance records will be kept for at least 3 years and information will be reassessed if the:

- Waste changes;
- Process giving rise to the waste changes; or
- Waste received does not conform to the pre-acceptance information.

Parameters to be checked at the acceptance stage will be determined when the acceptance of waste has been agreed with a customer.

5.1.1 Clinical WTS

The waste producer/holder of any offensive waste for the clinical WTS activity must ensure that the waste is segregated and packaged in accordance with the '*Safe Management of Healthcare Waste (HTM 07 01)*' Guidance⁴.

The site management will ensure that the following information is obtained in writing for any offensive waste to be accepted as part of the clinical WTS activity:

- Details of the waste producer including their organisation name/medical practice, address and contact details;
- Specific source of the waste i.e. pharmacy, veterinary, primary care, dental, acute care, laboratory;
- A description of the waste stream and types produced including quantity, physical form, composition, properties, classification and description.

Before waste is received, a pre-acceptance audit report will be required from the waste producer. The audit report must include the following general information:

- Name, address and contact details of the healthcare waste practice;
- The type of practice, for example, hospital veterinary, clinical, general practice;

⁴ [Healthcare waste: appropriate measures for permitted facilities - Waste pre-acceptance, acceptance and tracking appropriate measures - Guidance - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/healthcare-waste-appropriate-measures-for-permitted-facilities-waste-pre-acceptance-acceptance-and-tracking-appropriate-measures)



- Dates of when audit started and ended;
- Description of the audit, procedures employed, the auditors, their affiliation and their competence;
- The waste's written description, type and classification using List of Waste codes;
- The type and colour coding of the container or packaging the waste is placed in, and how the packaging is labelled;
- The wastes physical form and composition; and
- Hazardous properties of the waste.

5.2 Waste Acceptance

The site will implement WAP to check that the characteristics of the waste received matches the information provided during waste pre-acceptance.

This will ensure the waste is as expected and that it can be accepted at the site.

The procedure will follow a risk-based approach considering:

- The source, nature and age of the waste;
- Potential risks to the process safety, occupational safety and environment;
- The potential for self-heating; and
- Knowledge about the previous waste holder(s).

5.2.1 Load Inspection and Waste Control

Vehicles enter the facility off a private road to the west via an access road and report to the weighbridge complex. The waste is weighed at the weighbridge and directed to the waste reception and processing area. If practical this area shall be empty prior to any new loads being tipped to ensure there is a reduced chance of contamination.

The machine operator shall spread the waste to allow a clear view for a trained member of staff to inspect the waste. All operational staff shall be trained to identify whether the load shall be accepted or rejected. The weighbridge shall be notified immediately if the load is rejected and reloaded. This is identified on the weighbridge ticket by having the same tare weight and comments noted as 'REJECTED'.

Wastes is only accepted at the site if the description in the accompanying documentation is in accordance with the EP and that onsite inspection confirms waste is consistent with the description provided.

Records of non-compliant waste received at the site will include details on:

- The quantity;
- Characteristics;
- Origin;
- Delivery date and time; and
- The identity of the producer and carrier.

Wastes is not accepted unless the site is adequately resourced to receive the waste.

A record will be kept in the site diary of all rejected wastes. The waste producer and (where required) the EA will be notified of the non-conformance.



5.2.2 Clinical WTS

Offensive waste arriving at the site will be assessed using the site's strict WAP upon arrival at the site to ensure that the characteristics of the waste matches the information obtained at pre-acceptance.

In addition to the above, following visual inspection checks, offensive waste will be offloaded into a dedicated storage area as illustrated on Drawing 02. Once offloaded, the waste will be assessed and verified. The site operative carrying out the waste acceptance checks will be specifically trained to identify and manage any non-conformances in the loads received and implement the EA's Healthcare Waste: Appropriate Measures for Permitted Facilities, Guidance⁵.

Sharps boxes received do not need to be opened during visual inspection, and the contents can be verified by referring to the appropriate colour coded waste packaging.

Upon arrival, bagged waste will be unloaded into rigid, leak proof bulk containers for storage and handling around the site, and any rigid containers will be unloaded into enclosed bulk containers. All containers will be in good condition, with secure well-fitting lids, and closing mechanisms. All waste received will be labelled to allow CRL to track the waste, and identify the producer, its type, hazardous properties, and the date of receipt.

5.3 Quarantine

The quarantine and rejection procedures will ensure that all non-conforming waste is removed from the site and that the waste producer and carrier are informed so that appropriate action can be taken to prevent recurrence.

Non-conforming waste will be identified by site operatives during visual inspection of the waste. Non-conforming waste will be identified by visual and olfactory means.

If unauthorised waste is identified it will be moved to a designated quarantine area, the location of which is illustrated on Drawing 02. The quarantine area will be utilised for the segregation and isolation of any non-confirming waste identified. The area will be clearly marked as the quarantine area. Non-conforming waste will be stored in the quarantine area prior to export from site to a suitably permitted alternative facility.

The site will have procedures for dealing with non-conforming waste including the maximum storage time for waste in the area. If the waste has the potential to be odorous or attract pests, it will be removed from site within 24 hours to a suitably licenced facility.

5.3.1 Waste Tracking

The quantity of waste accepted and despatched from the facility is measured via the weighbridge or calculated by recording the volume of waste entering the site and the application of standard EA conversion factors as appropriate.⁶

All wastes entering the site is recorded upon arrival and the resulting outputs removed from site for disposal, further recovery or recycling will also be recorded on exit.

The site's waste tracking system will hold all the information generated during:

⁵ [Healthcare waste: appropriate measures for permitted facilities - Waste pre-acceptance, acceptance and tracking appropriate measures - Guidance - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/healthcare-waste-appropriate-measures-for-permitted-facilities-waste-pre-acceptance-acceptance-and-tracking-appropriate-measures)

⁶ In accordance with WRAP Guidance (and using conversion factors used in measuRE - from July 2014) waste type 17 08 02 has a conversion of 1 tonne is equivalent to 0.33m³ and 19 12 12 a factor of 1 tonne is equivalent to 0.37m³.



- Pre-acceptance;
- Acceptance;
- Storage;
- Repackaging;
- Treatment; and
- Removal off site.

6.0 Waste Storage

Waste will be stored on site in accordance with the site layout illustrated on Drawing 02. All waste will be stored within designated concrete bays, and all waste storage and treatment areas of the site will benefit from impermeable surfacing, and sealed drainage.

The following summarises the key waste storage measures to be adopted on site:

- Waste will be stored in locations that minimise the unnecessary handling of waste (i.e. within close proximity of the treatment plant input and output area);
- Waste handling will be carried out by competent staff using appropriate equipment;
- All waste will be stored and treated within the building and is therefore away from any watercourses and sensitive receptors. This also ensures that all waste will be securely stored preventing unauthorised access and vandalism;
- The quantity of stored waste will be monitored against the allowed maximum capacities;
- Waste will be processed as soon as possible and stored on site in accordance with Table 6-1. Treatment will be prioritised for treatment or removal offsite based on the following:
 - Its type;
 - Its age on arrival;
 - The date of arrival; and
 - The duration of storage on site.
- Waste will be treated on a first-in-first-out basis unless more recently received wastes are prioritised because they pose a higher risk of pollution;
- Storage areas will benefit from daily cleaning using brooms and weekly washdowns using hoses;
- Storage areas will be inspected weekly to ensure there is no loss of containment; and
- Any spillages will be cleared and logged in the site diary immediately.

Table 6-1 below details the waste storage arrangements for all waste types accepted on site.

Table 6-1 Waste Storage Arrangements

Waste Type	Maximum Amount on site	Maximum time on site
Residual Waste (unprocessed)	2,000 – 3,000 tonnes	14-21 days
RDF Bales*	4000 bales*	3 months*
C&D/C&I Waste Streams (see above)	600 tonnes	14-21 days
DMR/Recyclables (unprocessed)	3,000 - 4,000 tonnes	1 month



Waste Type	Maximum Amount on site	Maximum time on site
DMR/Recyclables Bales	800 bales	3 months
Food/Comingled Food & Green waste	150 tonnes	72 hours
Green Waste	100 tonnes	72 hours
Metal (external)	300 tonnes	1 month
Metal (internal)	100 tonnes	7 days
Waste Plasterboard, recycled Gypsum Powder product and/or recycled plasterboard paper	1320 tonnes (20,000 tonnes per annum)	2 months
Street Sweepings	150 tonnes	3 days (typically 24 hours)
Offensive Waste	50 tonnes at any one time	12-24 hours

6.1 Clinical WTS

Offensive waste accepted on site as part of the clinical WTS activity will be stored within designated bays 7a, and 7b inside the existing C & D / C & I MRF building as illustrated on Drawing 02. The building benefits from impermeable surfacing and sealed drainage. The following summarises the key waste storage measures for offensive waste adopted on site:

- Rigid waste containers will be stored sealed and in good condition, in an upright position. Bagged waste will be stored in fully enclosed, lockable, rigid, leak-proof and weather proof bulk containers. All containers will have a lid that will be closed securely whenever they contain waste, except during loading and unloading;
- A maximum of 20,000 tpa of offensive waste will be accepted at the site, with a maximum of 100 tonnes stored on site at any one time;
- Offensive waste will be stored within designated bays 7a, and 7b inside the existing C & D / C & I MRF building as illustrated on Drawing 02;
- The clinical WTS activity, will be operated in a way that minimises waste handling, and maintains the integrity of waste packaging;
- Healthcare wastes will be stored according to waste type and destination;
- Containers will be stored so that they can be accessed easily for inspection at all times;
- Offensive waste will be stored for a maximum of 14 days (usually 72 hours);
- Transfer off-site will be prioritised based on the waste type, age on arrival, date of arrival, duration of storage on site. A first-in, first-out principle will be followed;
- The impermeable surfacing within the building will allow for suitable disinfection. Site surfaces will be cleaned and disinfected, on a regular basis;
- Containers will be inspected before each reuse to ensure that they have been cleaned and disinfected, are physically sound, and the locking mechanism works.



7.0 Waste Treatment

The full process description is detailed within Section 4.0 above.

Up to date details of the waste characteristics will be kept including the following:

- Simplified process flow sheets that show the origin of the emissions;
- Diagrams of the main plant items where they have environmental relevance including storage areas, and tanks;
- Details of physical treatment processes undertaken on site;
- An equipment inventory, detailing plant type and design parameters;
- Waste types to be subject to the treatment process;
- The control system philosophy and how the control system incorporates environmental monitoring information;
- Process flow diagrams (schematics);
- The hourly processing capability of waste treatment equipment; and
- A summary of operating and maintenance procedures.

There is no waste treatment proposed as part of the clinical WTS activity, only storage and bulking up.

8.0 Emissions Control

The site will continue to be operated so that there are no point source emissions to air, groundwater or land.

8.1 Point Source Emissions to Surface Water

The site holds two existing discharge consents (Ref: P.21638/K/SW/07 and MW/LHC L77 CONS).

8.2 Surface Water and Groundwater

The site is operated, and will continue to be operated to prevent fugitive emissions to surface water and groundwater.

8.2.1 Engineered Containment

The site benefits from an engineered drainage system, and impermeable surfacing throughout, and there is no change required as part of this EP variation application.

Process water will continue to be controlled as follows:

The site was purpose built for handling organic waste and has capture zones for the collection of liquid that was a by-product from receipt and treatment of comingled green and food waste, green waste and food waste. The site is now being used to transfer these materials, scrap metals, RDF production and a MRF for sorting mixed dry recyclables. Any process liquids produced are stored in 3 process water tanks as follows:

- 1 x 600m³ process water tank (truck wash tank) located to the south of the site;
- 2 x 550m³ surface water run-off tanks located to the north of the site.

The tanks are emptied as necessary using a vacuum tanker for treatment at an appropriate outlet.



It is not considered likely that any process waters will be generated within the MRF building. However, any negligible amounts of liquid occurring will be contained within the building and cleaned up as required.

Any free leachate created from the storage of green waste will be collected, via fall, within the sealed drainage system.

As part of the proposed variation, street sweepings, and hazardous glass waste will be stored within bays 1 and 2 respectively. Each bay will be fully sealed and covered with tarpaulin to minimise the likelihood of the generation of run off. Any run off that is produced would be contained, and collected within the respective bays prior to removal from site along with the waste.

The Swale Estuary bund runs along the eastern boundary of the site to prevent any process water from entering The Swale.

8.2.2 Containment Bunding

All tanks containing potentially polluting liquids will be bunded. Bunds are:

- Impermeable and resistant to the stored materials;
- Have no outlet and drain to a blind collection point;
- Have pipework routed within bunded areas with no penetration of contained surfaces;
- Be designed to catch leaks from tanks or fittings;
- Have a capacity greater than 110% of the largest tank or 25% of the total tankage (whichever is greater);
- Have tanker connection points within the bund; and
- Be subject to regular visual inspection.

8.3 Sewer

There are no direct discharges to sewer from the waste management operations at the facility.

8.4 Odour

Different operations carried out on the site pose differing levels of risk relating to odour as shown below. The site will continue to be operated so as to minimise odour emissions from the various operations in line with the existing Odour Management Plan (OMP).

Refuse Derived Fuel

RDF bales are not generally odorous in nature as the residual waste that makes up the feedstock for the RDF operation is predominately sourced from commercial or industrial outlets.

All unprocessed residual waste is stored inside the RDF building. The building is equipped with two roller shutter doors for entrance and exit. Doors will be kept closed as much as operationally practicable during deposit and loading. The RDF building benefits from impermeable concrete surfacing with a sealed drainage system, reducing any potential fugitive emissions, in particular odour, before being transferred off-site to a suitably licensed facility.

As part of the EP variation, CRL propose to add a further baling operation and associated plant, located under a canopy outside of the DMR MRF building immediately to the west. Due to the predominantly commercial/industrial nature of the RDF feedstock, the additional baling operation is unlikely to increase odour emissions.



The waste is typically processed within 72 hours and is wrapped with plastic film to prevent odour escape.

Bales are not stored on site for more than 3 months to minimise breakdown of the content.

The integrity of the bales is checked regularly to ensure that the waste is contained and not emitting any odour.

The integrity of the bales is checked on a weekly basis to ensure that the waste is contained and not emitting any odour.

Dry Mixed Recyclables MRF

Dry mixed recyclables are not generally odorous in nature.

All storage and treatment of this waste occurs within the MRF building as illustrated on Drawing 02.

Green Waste

Up to 15,000tpa of green waste is stored in a dedicated bunker benefiting from impermeable concrete surfacing with a sealed drainage system, reducing any potential fugitive emissions, in particular odour, before being transferred off-site to a suitably licensed facility. There is no treatment of green waste on site.

Green waste is stored in a bay constructed of concrete blocks / frames with litter netting to the rear (being the site boundary adjacent to the SSSI/Ramsar site). Green waste is not stored for longer than 72 hours. A maximum of 100 tonnes of green waste is stored at any one time. The Green Waste storage area benefits from impermeable surfacing and a sealed drainage system. The Green Waste in the storage area will not exceed 100 tonnes at any given time and will meet the incoming Waste acceptance Criteria set out in Appendix OT1.

Co-mingled Food and Green Waste and Food Waste

Up to 15,000 tpa of food/comingled food and green waste is stored in a dedicated bunker inside the main RDF building before being transferred off-site to a suitably licensed facility. In addition, the decommissioned composting bio filter will be repurposed to provide a further covered food storage container. The food storage locations are illustrated on Drawing 02. There will continue to be no treatment of this waste on site. Vehicles delivering co-mingled food and green waste and food waste will be sheeted or have sealable containers, which will not be opened until inside.

The RDF waste reception building is equipped with two roller shutter doors for entrance and exit, standard operating will prominally see the southern entrance door being used but in the case of operational issues the northern entrance door can be used as an alternative.

Doors will be kept closed as much as operationally practicable during deposit and loading. The RDF building benefits from impermeable concrete surfacing with a sealed drainage system, reducing any potential fugitive emissions, in particular odour, before being transferred off-site to a suitably licensed facility.

Storage of Metal, Glass and Hazardous Glass

Metal and glass waste is accepted on the existing site, and is not considered to be odorous in nature. Only source segregated single stream hazardous glass will be accepted on site, for storage and bulking up only. Glass is not considered to be odorous in nature. To further minimise the likelihood of the generation of odours, hazardous glass will be stored within the fully sealed Bay 2 and will be covered with tarpaulin. Therefore, the external storage of metal and glass in bays will not increase the risk of odour emissions from the site. All storage will occur in designated bays.



Street Sweepings

There is no proposed treatment of street sweepings on site, and the waste will be accepted, stored and bulked up only. Street sweepings are not considered to be odorous in nature, and therefore will not increase the risk of odour emissions from the site. Street sweepings will be stored within the fully sealed Bay 1, and covered with tarpaulin, which will further minimise the risk of odour.

Clinical WTS Activity

Offensive waste types including AHPs and sharps, will be accepted on site for storage and bulking up only and there will be no treatment of offensive waste on site.

The offensive waste will be stored within designated bays inside the existing C & D / C & I MRF building as illustrated by bays 7a and 7b on Drawing 02.

The building is equipped with roller shutter doors which will continue to be kept closed as much as operationally possible during deposit and loading. The building benefits from impermeable surfacing and a sealed drainage system.

Vehicles delivering offensive waste will be sheeted or have sealable containers which will not be opened until inside.

Offensive waste will be stored for a maximum of 72 hours, prior to being transferred off site to a suitably licensed facility.

Monitoring

Operations at the site will be undertaken in accordance with the site's existing OMP which ensures that any problems associated with odours are identified, and appropriate remedial and corrective action will be implemented as soon as practicable, including the removal of any odorous waste where necessary.

Daily sniff testing and monitoring of weather forecasts is carried out by the site manager. If on site sniff testing results in an odour of level 4 or above then off site sniff testing will be conducted downwind of the site close to the nearest receptor.

8.5 Dust

The site is operated so as to minimise dust emissions from the site. Measures that will continue to be taken at the site include:

- Where applicable, doors to all buildings are kept closed as much as operationally practicable during deposit and loading, to prevent the release of dust from waste processing;
- Speed limits are in place for all plant and vehicles using the site;
- Traffic calming measures are in place to enforce speed limits & reduce emissions of dust;
- Street sweepings will be stored in a sealed bay and covered with tarpaulin to minimise the risk of the generation of dust;
- Site access, haul roads and operational areas are maintained and repaired to minimise emissions of dust due to uneven and poor surfacing;
- All roads and operational areas will be swept where necessary to reduce dust emissions;
- All vehicles delivering waste to the site are sheeted to minimise emissions of dust;



- A bowser will be deployed to water surfaces during periods of prolonged dry weather; and
- Drop heights are minimised to prevent emissions of dust.

8.6 Noise

Waste treatment operations are only carried out during operational hours. All equipment is maintained and operated in accordance with manufacturer's guidance and is maintained in good working order.

The site will continue to be operated so as to minimise noise emissions from the site. Measures that taken at the site include:

- Where possible plant is located away from noise-sensitive receptors;
- material drop heights are minimised where possible;
- All plant is switched off when not in use;
- Speed limits for all vehicles delivering waste to the site are imposed, reducing noise associated with high engine speeds;
- All site personnel are trained in the need to minimise site noise, and are responsible for monitoring and reporting excessive noise when carrying out their everyday roles;
- All plant and equipment in use at the site is regularly maintained to minimise noise resulting from inefficient operation of pumps, generators and engines;
- In the event that reversing alarms are found to give rise to complaints, alternative alarms or technology will be investigated;
- The regular maintenance of roads to prevent the development of potholes significantly reduces the noise generated particularly by empty vehicles exiting the site; and
- Consideration will be given to the fitting of noise suppression kits on items of plant and equipment.

Any complaint received will be logged in the site diary. The Site Manager will investigate the complaint and will take action to identify the source of the noise and implement remedial measures where appropriate.

8.7 Pests

The nature of the food and green waste transfer operations, and proposed clinical WTS activity that occur on site have the potential to attract unwanted pests. The site is operated at all times so as to minimise the possibility of pests.

Unprocessed green waste is unlikely to attract vermin and pests. The storage of this waste is limited to 72 hours.

Co-mingled food and green waste and food waste is stored within the RDF building which benefits from an impermeable concrete floor. As a result of the EP variation application, food waste will also be stored within the decommissioned composting bio filter as illustrated on Drawing 02. The bio filter provides a covered storage area which will minimise the risk of attracting pests. Co-mingled food and green waste and food waste is stored for a maximum of 72 hours and a maximum amount of 150 tonnes at any one time. Doors are kept closed as much as operationally practicable during deposit and loading which will limit the potential attraction of pests.



Offensive waste will be stored within designated bays inside the existing C & D / C & I MRF building as illustrated by bays 7a and 7b on Drawing 02. The building is equipped with roller shutter doors which will continue to be kept closed as much as operationally possible during deposit and loading. Offensive waste will be stored for a maximum of 72 hours, prior to being transferred off site to a suitably licensed facility.

The facility is inspected by both site management and operatives for infestations of pests, vermin and insects on a routine basis. In the event that specific waste is found to be responsible for attracting scavengers, pests or infestation, this waste will be removed from the site as soon as practicable.

A specialist pest control contractor will be deployed if required.

8.8 Litter

The waste types accepted and treated on site could potentially lead to litter escaping buildings, storage areas or vehicles.

The site's waste acceptance procedures ensure that only authorised wastes are accepted and all wastes with the potential to generate litter are accepted, stored and treated within the confines of buildings with roller shutting doors, the layout of which is illustrated on Drawing 02.

Metal, glass and hazardous glass waste will be stored outside in designated bays, located to the northern area of the site, before being bulked up and transferred off site. This type of waste will not lead to the escape of litter.

When accepted, street sweepings will be stored outside within Bay 1 prior to bulking up and transfer off site for further recovery/disposal. Street sweepings will be covered with tarpaulin and are unlikely to generate litter.

Green waste is stored within a specified bay, benefiting from litter netting.

The site and its immediate surrounding is inspected on a daily basis and action will be taken to maintain the area free of significant accumulations of litter and debris.

All yard areas are swept clean every day and any spilt waste deliveries are removed.

Any excessive litter material at the facility or on the highways will be cleared using a mechanical sweeper and/or litter picker if required.

8.9 Mud and Debris

The facility is accessed via a private road to the west. The road serves the Ridham Dock industrial area. Within the site the following measures are taken in order to prevent the deposition or tracking of mud or debris from the site onto public areas or highways:

- Site roads are maintained free of significant quantities of mud and debris;
- All operational areas are subject to monitoring by staff throughout the working day to identify accumulations of mud requiring remedial action;
- Where necessary road cleaning equipment will be deployed; and
- All vehicles leaving operational areas will, before leaving the site, be cleaned as necessary and will be checked to ensure that they are clear of loose waste and that any products being exported from the site are secure.

In the event that mud, debris or waste arising from the site is deposited onto public areas outside the site, the following remedial measures will be implemented:

- The affected public areas outside the site will be cleaned;



- Traffic will be isolated from sources of mud and debris within the site to prevent further tracking of mud and debris, and measures will be taken to clear any such sources as soon as practicable; and
- Provision will be made for road sweepers on the site access roads to stop any mud being carried onto public roads, and bowsers made available to damp down areas during dry periods to ensure that dust is not a problem.

9.0 Information

All relevant notifications and submissions to the EA regarding the site will be made in writing and will quote the EP reference number and the name of the permit holder.

Records will be maintained for at least 6 years, however in the case of off-site environmental effects, and matters which affect the condition of land and groundwater the records shall be kept until permit surrender. Duty of Care records will be kept for a minimum of 2 years.

9.1 Reporting and Notifications

9.1.1 Changes in Technically Competent Persons

The EA will be informed in writing of any changes in the technically competent management of the site and the name of any incoming person, together with evidence that such person has the acquired technical competence.

9.1.2 Waste Types and Quantities

A summary report of waste types and quantities accepted and removed from the site for each quarter, will be submitted to the EA within 1 month of the end of the quarter unless otherwise required by the permit conditions.

9.1.3 Relevant Convictions

The EA will be notified of the following events:

- CRL being convicted of any relevant offence; and
- Any appeal against a conviction for a relevant offence and the results of such an appeal.

9.1.4 Notification of Change of Operator's or Holder's Details

The EA will be notified of the following:

- Any change in the operator's trading name, registered name or registered office address; and
- Any steps taken with a view to the company going into administration, entering into a company voluntary arrangement or being wound up.

9.1.5 Adverse Effects

The EA will be notified without delay following the detection of the following:

- Any material and long term malfunction, breakdown or failure of equipment or techniques;
- Any accident that will affect the ability to process or export/transport wastes off site;
- Fugitive emissions which have caused or may cause significant pollution; and
- Any significant adverse environmental and health effect.





