



Application Support Document

Portico Shipping Limited

14th November 2025

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Application Support Document

Portico Shipping Limited



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NON-TECHNICAL SUMMARY

This document has been prepared on behalf of Portico Shipping Limited (*‘the Applicant’* or *‘PSL’* hereafter) by Sol Environment Ltd and provides supporting evidence as required by Environmental Permit Application Forms B2 and B4 issued by the Environment Agency.

Portico Shipping Limited are making this application for a Bespoke Waste Operation Permit under Schedule 9 of the *Environmental Permitting (England and Wales) Regulations 2018 (as amended)*, for the receipt, storage and transfer of non-hazardous wastes at their existing dockside site in Portsmouth.

The site is located at Portico House, 2 Prospect Road, Portsmouth PO1 4QY, (National Grid Reference: SU 64203 01509).

The site is currently operated for storage and transfer of a variety of fresh produce and dry bulk loads, most notably known for the storage and shipment of bananas. PSL now additionally intend to store and export up to 190,000 tonnes per annum of non-hazardous waste fuels comprised of baled refuse derived fuel (RDF), processed shredded tyre, shredded wood and non-hazardous waste soil.

The site will meet the description of a *‘Waste Operation’* as defined by the Environmental Permitting Regulations due to the proposed receipt, storage and transfer of non-hazardous waste. There will be no waste treatment onsite.

General Overview

The site will accept up to 190,000 tonnes of waste fuels per annum including a mix of waste wood, RDF, processed shredded tyre and waste soil. RDF waste will arrive baled and waste soil will arrive within construction bags. All other waste will arrive in a loose state before being transferred from sealed HGVs to their allocated storage locations.

The majority of wastes are to be stored externally either within piles separated by a 6m separation distance or designated bays located at the Albert Johnson Quay storage area. Externally stored wastes comprise:

- Baled RDF – 50,000 tonnes per annum;
- Shredded wood – 20,000 tonnes per annum; and
- Shredded tyre – 60,000 tonnes per annum.

Up to 60,000 tonnes per annum of non-hazardous waste soil will be stored internally within Shed 14, a recently constructed multi-use bulk cargo building. All soil will be stored in construction bags, ranging from 0.6 to 4 tonnes.

PSL anticipate there will be no more than 10,000 tonnes of waste on site at any given time.

Waste will be stored on site for 3 weeks under normal operation before being shipped to overseas destinations and used for energy recovery. In exceptional circumstances, such as when shipments are delayed, PSL will store the waste for a maximum of 3 months before the waste will be transported back to the supplier.

The port’s current storage and shipping operations mean the site is already well equipped for the transport and storage of non-hazardous wastes. The site can quickly adjust its infrastructure and construct bays within the existing storage areas as needed for waste storage. This ensures the site can remain flexible when storing

non-regulated materials in these areas and the storage of waste will not compromise PSL's wider existing operations.

Given the sites industrial setting within Portsmouth Port and existing operations, the site is well equipped to expand its operation to the warehousing and shipping of wastes ensuring minimal amenity impacts such as odour, dust and noise emissions.

Emissions to Air

There are no point source emissions to air resulting from the proposed permitted activities at the site.

Odour

The site is considered to be in a moderately sensitive area, with the nearest residential receptors located 130m east across a major road. Potential odour emissions from the storage and transfer of waste materials at the site will be carefully managed through implementation of a stringent Odour Management Plan. Mitigation measures will include (but are not limited to):

- Strict pre-acceptance and acceptance criteria;
- Delivery of wastes in covered vehicles;
- Short turn-around times;
- Minimising handling;
- Storage of RDF in wrapped bales preventing escape of potentially odorous air emissions;
- Covering of waste piles where required, for example in hot weather; and
- Good housekeeping measures.

The Odour Management Plan has provided as part of this application in Annex C – Odour Management Plan.

Dust

Fugitive emissions of dust from storage of wastes onsite will be controlled through implementation of a stringent Dust Management Plan. Mitigation measures will include (but are not limited to):

- Delivery of wastes in covered vehicles;
- Storage of potentially dusty material, i.e. waste soils, within a building;
- Covering of external stockpiles where required e.g. windy days;
- Minimising drop heights;
- Storage of RDF in wrapped bales;
- Dust suppression where required;
- Good housekeeping;
- Regular site inspections.

Noise

There is no additional site equipment required for the storage of wastes onsite. The existing operations will continue, simply with waste storage rather than material storage on occasion. As such there will be no changes to the existing noise climate of the current active portside facility.

Emission to Controlled Water

There are no process emissions to controlled waters resulting from the proposed permitted activities at the site.

The external storage of waste may give rise to potentially contaminated surface water run-off. This will be collected within the onsite drainage system in a holding tank. When wastes are present onsite, a penstock valve will be closed preventing the usual discharge. All waters collected in the holding tank whilst wastes are onsite will be tankered offsite for disposal.

Emissions to Sewer

There are no direct process emissions to sewer resulting from the proposed permitted activities at the site.

Emissions to Land

There are no emissions to land resulting from the proposed permitted activities at the site.

1. INTRODUCTION

This document has been prepared on behalf of Portico Shipping Limited (*The Applicant* or *PSL* hereafter) by Sol Environment Ltd, and provides supporting evidence as required by Environmental Permit Application Forms Part B2 and B4 issued by the Environment Agency (EA).

Portico Shipping Limited are making a this application for a Bespoke Waste Operation Permit under the Environmental Permitting (England and Wales) Regulations 2018 (as amended), to store and transfer a variety of non-hazardous wastes at their site located at Portico House, 2 Prospect Road, Portsmouth PO1 4QY (National Grid Reference: SU 64203 01509).

PSL currently operate the site for warehousing and shipping of a variety of dry bulk loads, break bulk and fresh produce, most notably bananas. PSL now intend to store and export a range of waste fuels such as baled RDF, processed shredded tyre and waste biomass fuels for recovery. Waste volumes onsite will be limited to no more than 190,000 tonnes per annum.

The majority of wastes are to be stored externally either within piles separated by a 6m separation distance or designated bays located at the Albert Johnson Quay storage area. Externally stored wastes comprise:

- Baled RDF – 50,000 tonnes per annum;
- Shredded wood – 20,000 tonnes per annum; and
- Shredded tyre – 60,000 tonnes per annum.

Up to 60,000 tonnes per annum of non-hazardous waste soil will be stored internally within Shed 14, a recently constructed multi-use bulk cargo building.

PSL anticipate there will be no more than 10,000 tonnes on site at any given time.

Waste will be stored on site for 3 weeks under normal operation before being shipped to over sea destinations and used for energy recovery. In exceptional circumstances, such as when shipments are delayed, PSL will store the waste for a maximum of 3 months before the waste will be transported back to the supplier.

All technical appendices associated with the permit application are included within the Annexes of this document and comprise the following:

- Annex A: Site Plans;
- Annex B: Environmental Risk Assessment;
- Annex C: Odour Management Plan;
- Annex D: Fire Prevention Plan;
- Annex E: Dust Management Plan;
- Annex F: Environmental Management System Summary;
- Annex G: Competence Certification;
- Annex H: Site Condition Report ;
- Annex I: Accident Management Plan.

2. SITE DETAILS

2.1 Site Location

The proposed site will be located at Portico House, 2 Prospect Road, Portsmouth PO1 4QY, (National Grid Reference: SU 64203 01509).

The site is located within a predominantly industrial area, with Portsmouth Harbour adjacent to the west and the residential area of Buckland to the east.

To the north the site is bound by Portsmouth International Port with commercial properties and hardstanding for storage immediately east. Directly south of the site lies Prospect Road in addition to more hardstanding and warehouses used for storage of aggregate and food produce. The nearest residential dwellings are located across the A3, around 128m east.

Portsmouth Harbour is a designated Ramsar, SSSI and SPA protected site.

2.2 Permit Boundary

The proposed permit boundary can be seen below in Figure 2.1. All waste activities will take place within the permit boundary.

A Site Condition Report, providing a conceptual model for the site has been completed and included within Annex H – Site Condition Report.

2.3 Site Layout

The site covers approximately 3.77 hectares and is predominantly occupied by hardstanding with warehouses located in the centre, east and north east of the site.

External storage will either take place within piles separated by a 6m separation distance or within designated bays. Designated bays for the external storage of waste will be constructed periodically when a waste shipment is due in. The layout of the bays will be flexible to allow optimisation based on volumes and types for each shipment, but will always be located within the Albert Johnson Quay Area.

Shed 14 within the northern area of the site will be utilised for waste soil storage.

2.4 Infrastructure and Design

Infrastructure

Shed 14 has recently been erected (circa 2022), and is of typical warehousing construction, with roller shutter doors. There are no internal drains within Shed 14.

The external storage within the Albert Johnson Quay Area will either consist of waste piles with 6m separation distances or external bays which will be periodically erected constructed from concrete blocks. The quayside area has been levelling prevents surface water run-off directly entering the harbour.

To retain flexibility in site operations, there will be no fixed layout of the piles / bays, which will only be constructed for the storage of waste when such a shipment is pending.

All storage will be carried out in accordance with the sites Fire Prevention Plan provided within Annex D – Fire Prevention Plan.

Surfacing

The entire site is located upon impermeable concrete hardstanding.

Site Drainage

The entire site is constructed on sealed impermeable hardstanding which has been designed to attenuate, contain and control all surface water runoff. The Site Drainage Plan is provided below in Figure 2.3 and within Annex A – Site Plans.

All uncontaminated surface water run-off from the site will be directed to the fully enclosed drainage system comprised of penstock valves and an interceptor located beneath the Albert Johnson storage area. The drainage design incorporates collection chambers and interceptors (active protection measures) to ensure that any particulate, solid contaminants and trace hydrocarbon materials are contained and captured on site.

Surface water coming from Shed 14 is on a downward western sloped gradient which allows for any surface water to drain toward drains in the west that ultimately connect to the Albert Johnson Quay interceptor.

Due to the gradient of the external waste storage areas, all run-off will be directed to the drainage system.

During periods when waste is present in the external storage areas, the drainage system penstock valves will be closed, preventing any potentially contaminated surface water run-off from discharge. During this time, all potentially contaminated surface water run-off will be contained onsite and then tankered offsite for disposal.

In the event of a fire, all firewater will be contained as above, in the drainage system through the use of penstock valves.

Roadways and External Areas

An internal roadway system has been designed to give safe access and egress around site and to keep raw materials and wastes separate as much as practicable.

Separate segregated pedestrian walkways and car parking areas have been provided to allow for safe access and egress of all personnel at site.

3. PLANNING & PERMITTING HISTORY

There are no existing or historical permits associated with the site.

Recent development onsite has consisted of the multi-use bulk cargo building (Shed 14) which was constructed in 2022. Table 3.1 below outlines the planning history of the site.

Table 3.1 - Planning History

Reference	Description	Status	Date Granted
23/00786/DOC	Application to seek approval of details reserved by conditions 3, 4, 5, 6 and 7 of planning permission 22/00255/FUL (Contamination and Piling)	Approved	05 Feb 2024
22/00255/FUL	Installation of concrete batching plant	Approved	Thu 20 Oct 2022
21/01218/ADV	Display of three non-illuminated fascia signs	Approved	Tue 26 Oct 2021
21/01219/FUL	Construction of Border Control Post and change of use to Operational Port Land (Sui Generis)	Approved	Thu 21 Oct 2021
18/00828/DEM	Demolition of single storey steel framed and steel clad warehouse structures	Prior Approval not required	Fri 15 Jun 2018
14/00830/FUL	Installation of roof solar panels to three buildings	Approved	Fri 12 Sep 2014
A*25482/M	ERECTION OF TRANSIT SHED On Land Adjoining Albert Johnson Quay Kettering Terrace	Conditional Permission	Thu 25 May 1972
A*25482/J	THE ERECTION OF ONE TRANSIT SHED on Land Adjacent To Albert Johnson Quay Portsmouth	Conditional Permission	Wed 19 Apr 1972
A*25482/H	CONSTRUCTION OF 2 CANOPIES FOR CONTAINER PROCESSING on Land Between Albert Johnson Quay And Kettering Terrace Portsmouth	Conditional Permission	Thu 20 Jan 1972
A*25482/G	LEVELLING OF LAND LAYING CONCRETE SURFACE & ERECTION OF 2 OP EN SHEDS (EACH APPROXIMATELY 100X40) (AFTER DEMO EXTNG SHED) on Land Adjacent To Albert Johnson Quay Portsmouth	Conditional Permission	Thu 18 Nov 1971
A*25482/E	CONSTRUCTION OF WATCHERS OFFICE FOR CUSTOMS & EXCISE at Albert Johnson Quay Mile End	Conditional Permission	Fri 31 May 1968
A*25482/B	USE OF LAND FOR PURPOSE OF WHARFAGING WAREHOUSING & HANDLING OF GOODS IN CONNECTION WITH ADJOINING QUAY OPERATIONS	Conditional Permission	Thu 18 Jan 1968
A*25482/A	NEW OFFICE TOILETS AND TRANSIT SHEDS Proposed at Quay South Of Bishops Quay-Now Known As Albert Johnson Quay	Conditional Permission	Thu 10 Feb 1966
A*25482	CONSTRUCTION OF NEW QUAYS at South Of Bishops Quay (Now Known As Albert Johnson Quay)	Conditional Permission	Wed 25 Nov 1964

4. PROPOSED ACTIVITIES

4.1 Type of Permit

Site operations are currently for the storage and transfer of goods and do not require regulation under the Environmental Permitting (England and Wales) Regulations 2018 (as amended). It is the intention of PSL to increase the range of materials brought and stored onsite to include specific waste streams, as such this will require regulation as a Waste Operation.

Therefore, PSL are making this bespoke permit application to allow the acceptance, storage and transfer of non-hazardous waste materials under the Environmental Permitting (England and Wales) Regulations 2018 (as amended). There will be no treatment of wastes onsite.

Wastes proposed for acceptance at the site are limited to shredded tyre, shredded waste wood, baled RDF and non-hazardous soils. Volumes will be no greater than 190,000 tonnes per annum, with wastes stored on site in Shed 14 (waste soils) in construction bags.

All wastes will be stored on site for approximately 3 weeks under normal operation. In the event of exceptional circumstances PSL will hold wastes for up to 3 months before returning the waste to the supplier.

The proposed permitted activities to be detailed within the permit are detailed in the table below:

Table 4.1 - Listed Activities

Activity Reference	Description of Specified Activity	Limits of Specified Activity
A1 Storage and transfer of non-hazardous waste	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) D15: Storage pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where it is produced)	All wastes shall be stored on an impermeable surface with sealed drainage Waste shall not undergo any treatment Waste shall be stored for no longer than 3 months prior to recovery or disposal

There are no Directly Associated Activities relevant to this permit application proposed onsite.

The technical guidance notes used in the preparation of the application document are:

- Environment Agency – Non-hazardous and inert waste: appropriate measures for permitted facilities, July 2021 (updated August 2023);
- EPR – How to Comply with your Environmental Permit (reference EPR 1.00).

4.2 Waste Types

This application is for the receipt, storage and transfer of non-hazardous waste up to a maximum of 190,000 tonnes per annum, with no more than 10,000 tonnes of waste to be stored on site at any given time.

Waste types are to be limited to shredded tyre, baled RDF, shredded waste wood and non-hazardous soils.

Deliveries of wastes will be restricted to the operational capacity of the site and as dictated by the sites Fire Prevention Plan (FPP). Wastes will only be accepted if there is sufficient storage capacity within the designated areas of the site and compliance with the FPP can be maintained.

All activities take place on impermeable hardstanding with isolated drainage to prevent any run-off entering the surface water system which discharges to Portsmouth Harbour.

A detailed list of European Waste Catalogue (EWC) codes of wastes that are proposed to be accepted at the site are provided in **Table 4.2** below.

Table 4.2 - Permitted Waste Types and EWC Codes

Waste Code	Description
17	CONSTRUCTION AND DEMOLITION WASTES (INCLUDING EXCAVATED SOIL FROM CONTAMINATED SITES)
17 02	wood, glass and plastic
17 02 01	wood
17 05	soil (including excavated soil from contaminated sites) – Stones and dredging soil
17 05 04	soil and stones other than those mentioned in 17 05 03
19	WASTES FROM WASTE MANAGEMENT FACILITIES, OFF-SITE WASTE WATER TREATMENT PLANTS ANDS THE PREPARATION OF 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 04	plastics and rubber
19 12 10	combustible waste (refuse derived fuel)

Notwithstanding the EWC codes stipulated in the table above, waste shall not be accepted at the site which has any of the following characteristics:

Do not align with the agreed EWC codes;

- Malodourous;
- Defined as Infectious;
- Drummed waste; or
- Hazardous waste.

The table below outlines the site’s waste storage plan for the accepted EWC waste types.

Table 4.3 - Waste Storage Plan

Waste	EWC Code	Approx. Quantity (Tonnes/yr)	Storage Times	Maximum Pile Size
RDF Bales	19 12 10	50,000	Stored externally for 3 weeks and no longer than 3 months	Maximum pile size no larger than 450m ³

Wood	17 02 01	20,000		Maximum pile size no larger than 450m ³
Shredded tyre	19 12 04	60,000		Maximum pile size no larger than 450m ³
Soil Waste	17 05 04	60,000	Stored internally within Shed 14 for 3 weeks and no longer than 3 months	N/A

All wastes will be accepted on site in accordance with the sites Environmental Management System, a summary of which is provided within Annex F – EMS Summary.

Raw Materials

Oils and fuel will be utilised for mobile plant as per current operations. The storage location for fuels used onsite is outside the proposed permitted boundary, within the wider Portico site.

4.3 Process Description

The proposed waste operation aims to receive, store and transfer non-hazardous waste alongside PSL's current operation as a food and bulk cargo transporter. Waste will be stored in designated areas in order to prevent PSL's wider operation and use of non-regulated materials from being compromised.

A summary of the activities carried out on site is provided in the sections below.

Vehicles will access the site via the main entrance on Wharf road and will be marshalled to the weighbridge located in the centre of the site, whereby all wastes will be subject to pre-acceptance, acceptance and rejection procedures. Any non-conforming wastes are rejected and returned to the waste producer.

Accepted waste will be transferred and stored in one of these storage areas:

- Albert Johnston Quay - Open storage area; or
- The multi-use bulk cargo building (Shed 14).

All non-hazardous waste soil will be stored within Shed 14 in construction bags and all other waste will be stored in designated bays within the Albert Johnson storage area. Prior to arrival of wastes to be stored in the Albert Johnston Quay Area, designated bays will be constructed if proposed or the location of piles separated by a 6m separation distance will be decided. To maintain maximum operational flexibility, there is no set layout proposed for the bays, this will be determined based on waste type and volumes of the shipment. Bays will always be constructed in accordance with maximum permitted sizes in accordance with the sites Fire Prevention Plan and upon impermeable hardstanding with isolated drainage.

Unloading of wastes will take place under supervision of an appropriately trained site operative. Wastes will be visually inspected during unloading with any identified non-conforming material isolated and quarantined pending removal offsite. Unloading will always take place on an impermeable hardstanding with sealed drainage to capture any run-off.

Waste storage volumes and times are minimised with all materials sorted and exported offsite for further recovery or disposal in the shortest time possible. Typically, waste will not be stored onsite any longer than three weeks. However, in the exceptional event that waste cannot be exported offsite in this time, the site will allow a maximum of 3 months.

Records of all wastes accepted and transferred to and from the site is maintained at site within an electronic tracking system.

The table below summarises the sites compliance with the ‘*Non-hazardous and inert waste: appropriate measures for permitted sites*’ in relation to waste storage and management.

Table 4.4 - Appropriate Measures Compliance for Waste

Appropriate Measure	Site Compliance
Site Design	<p>The site has been designed to meet all appropriate measures where possible when it comes to the storage of waste, including:</p> <ul style="list-style-type: none"> ▪ Due to the nature of the site, namely dockside location, storing and handling of waste is necessarily done in proximity to watercourse and sensitive receptors. However, where possible this is located as far as technically and economically possible from the sensitive receptors. ▪ All waste will be stored within the security protected area of the facility. ▪ Shed 14 has been designed to store waste in a way as to minimise fugitive emissions and waste types that are inherently dusty will be stored internally. ▪ Waste will be stored under cover during its time on site if necessary, either within Shed 14 or under stockpile covers. ▪ Adequate space has been designed for to allow the safe operation of plant and equipment, as well as the environmentally safe storage and treatment of waste. The site has been designed to accept up to 190,000 per annum of material with up to 10,000 tonnes storage at any one. This will be detailed fully in the management system. ▪ The site will have safe pedestrian and vehicular access to storage areas for the safe retrieval of wastes.
Waste Pre-acceptance	<p>The site will have comprehensive waste pre-acceptance procedures in place to meet the requirements of the appropriate measures when it comes to storing waste. This will include:</p> <ul style="list-style-type: none"> ▪ Full waste pre-acceptance and characterisation procedures for all new waste streams to ensure that the technical classification of the waste (through use of WM3 Assessment) is understood prior to storage. ▪ Pre-acceptance information will be reassessed on an annual basis. ▪ Pre-acceptance records will be kept for at least 3 years in the electronic tracking system.
Waste Acceptance, Rejection and Tracking	<p>The site will have comprehensive waste acceptance procedures in place to meet the requirements of the appropriate measures when it comes to storing waste. This will include:</p> <ul style="list-style-type: none"> ▪ Following successful inspections, waste will be offloaded directly into the dedicated storage area for that waste type. Waste that requires further inspection will be offloaded in a separate location. ▪ All non-conformances will be recorded, including waste assessed as acceptable for storage. ▪ The site will operate full written procedures for recording and reporting non-conforming and rejected wastes, and will include a suitable quarantine storage area. ▪ The onsite waste inventory will be readily available at all times. ▪ An electronic tracking system will be utilised to track the progress of waste throughout the site. ▪ An auditable bale identification system will be implemented to ensure bales are removed in date order.
Drainage	<p>The storage area will be able to:</p> <ul style="list-style-type: none"> ▪ Contain all possibly contaminated runoff. ▪ Prevent incompatible wastes coming into contact with each other. ▪ Make sure that fire cannot spread. ▪ Be designed to allow access for inspection and cleaning.
Monitoring, Maintenance and Inspection	<p>All storage areas will be inspected on a daily basis. A written record of all inspections will be maintained.</p>

	<p>The quantity of waste on site will be regularly monitored and assessed to ensure that maximum storage capacities are not exceeded.</p> <p>Procedures will be in place to ensure the safe loading, unloading and storage of all waste.</p>
<p>Storage</p>	<p>The storage areas will be designed to minimise the unnecessary handling of waste and be large enough to manage foreseeable changes in waste volumes and the site's ability to dispatch without causing pollution. Such events include bank holidays and periods of adverse weather. This will aid the site in preventing accumulation of wastes and removing waste as soon as possible. The site will follow the "first in, first out" principle, where practicable, to prevent waste remaining on site for excessive lengths of time.</p> <p>Under normal operation wastes will be stored for approximately 3 weeks with a maximum storage time of 3 months prior to return to supplier.</p> <p>The storage areas will be made from concrete that is suitable for cleaning and disinfecting. Procedures will be in place to ensure surfaces are regularly cleaned.</p> <p>The storage areas are designed as to prevent cross-contamination of wastes.</p> <p>Storage areas will be clearly marked and labelled as to type of waste and maximum volume.</p> <p>No high-risk activities involving fire or heat, such as grinding, welding, or smoking will take place in the storage areas. There will be a designated smoking area on site, and any emergency repairs needed to any of the plant or equipment will be done so in a safe location.</p> <p>RDF bales will be securely wrapped with HDPE (or equivalent) to prevent water ingress and access by pests.</p>
<p>Waste Transfers</p>	<p>The site will have a documented process for transferring wastes, and all staff relevant to this activity will be suitably trained.</p> <p>The moving of wastes to different locations will only be carried out following the creation of written procedures.</p>

A simplified process diagram is provided in Figure 4.1 below.

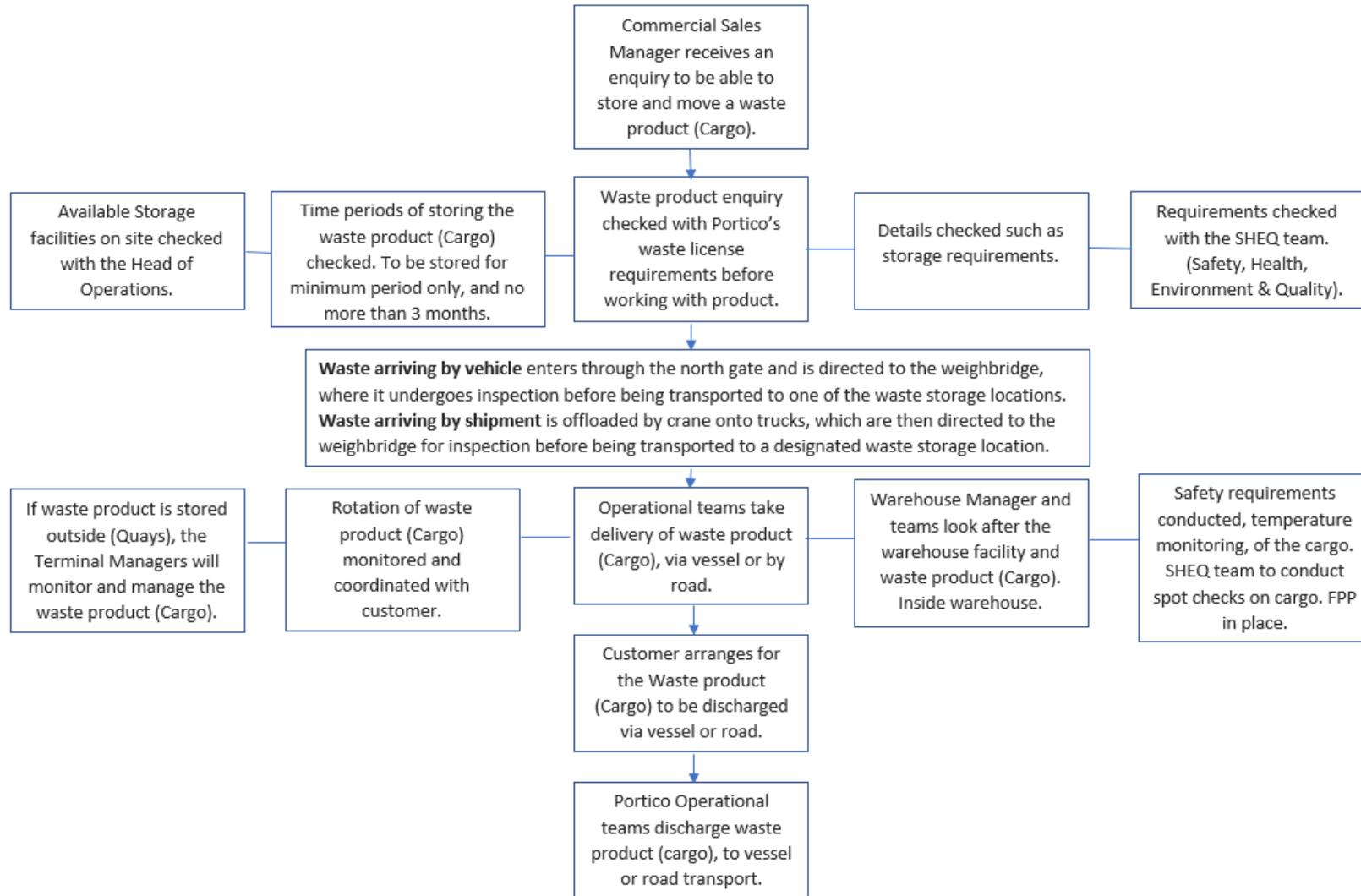


Figure 4.1 - Simple Process Flow

5. OPERATING TECHNIQUES

5.1 Environmental Management System

The PSL site will be operated in accordance with the company's Environmental Management System. This includes all aspects of the waste management process, including waste pre-acceptance, acceptance and rejection procedures, as well as the Odour Management Plan, Dust Management Plan and Fire Prevention Plan, all of which have been provided as part of this application. The site's EMS is designed to ensure:

- The identification of all foreseeable environmental impacts and risk that the activities pose to the environment.
- Prevention or minimisation of any identified risks to a practical minimum.
- Legal Compliance assurance.
- Identification of risks of pollution including those arising from operations, maintenance, accidents, incidents, non-conformances and complaints, and how these will be minimised.
- Activities at the site will be managed in accordance with the management system, which will be subject to continuous review, audit and improvement. Specific detailed management system reviews will take place if there is a significant change to the activities, following an accident or if a non-compliance is found.
- Furthermore, the whole management system will be subject to annual external audit by competent third parties.
- The key aspects of the EMS for the site include:
 - Preventative maintenance;
 - Operator requirements;
 - Training and Competence;
 - Emergency response and incident management; and
 - Monitoring, measurement and reporting.

The environmental management system and procedures are written to ensure that the environmental risk and impact of the normal running of the site activities are documented and minimised.

The EMS will be kept fully updated, and in operation from the beginning of permitted waste acceptance and a copy of the management system will be kept at a convenient location on site.

A summary of the EMS has been provided in Annex F – EMS Summary.

5.2 Operational Hours

The operational hours of the facility are not limited by planning permission and generally operate on a 24/7 basis, with vehicle deliveries taking place between the hours of 07:00 – 12:00.

Shipments take place 24/7 as is customary at Portsmouth Port.

5.3 Operator Competence

All personnel working at the facility will be trained in the necessary sections of the EMS and any associated procedures. All staff working for and on the behalf of the site will be suitably trained and competent (e.g. professional maintenance engineers, electricians, equipment operators etc.).

The primary role of day staff is to ensure and oversee material loading and transfer operations.

Additional activities will include general site housekeeping and administration activities. Additional staff attending the site will be visiting engineers from the equipment manufacturers who are adequately trained to perform their duties at the site. The site will maintain written operation instructions all for the plant and monitoring equipment present on site.

Technically Competency for the site is demonstrated through the employment of Billy Young, (Level 4 WAMITAB qualification as required by the WAMITAB competency scheme.

Evidence of WAMITAB certification is provided in Annex G – Competence Certificate.

5.4 Site Inspections and Maintenance

The site will be subject to a regular inspection and maintenance program to ensure the integrity of the site infrastructure remains high in order to prevent pollution to the environment. Site inspections will aim to detect signs of degradation, damage or erosion of any of the site features, including (but not limited to) hardstanding, Shed 14, drainage systems, fencing.

All maintenance activities on site will be carried out in accordance to the manufacturers' recommendations and will be integrated within the company's environmental management system.

The detailed management system operated by the site will include procedures for ensuring that adequate maintenance is undertaken at the site.

The maintenance programme will ensure that all equipment or infrastructure that is deemed essential in the prevention of pollution to the environment (e.g. hard-standing, drains) or the prevention of local nuisance impacts is maintained and kept in good operating condition.

5.5 Site Security

The site is securely enclosed through:

- A 2m high steel security fence around the boundary;
- The south and east entrances are gated and locked when not in use;
- The north and south entrances are manned 24/7; and
- On site security presence 24/7.

The site is surrounded by other premises that serve as buffer for unauthorised access to the site.

The entire site is covered by CCTV which is monitored frequently throughout the day.

5.6 Accident and Emergencies

The following sections outline the proposed accident management procedures.

5.6.1 Accident Management Plan

PSL has developed its own Accident Management Plan based around the specific risks associated with the site operations.

The key aspects of the site's Accident Management Plan are:

- Reviewed by Site Management annually, and as soon as practicable after an accident.
- Considers hazards presented by:
 - Actions in case of emergencies;
 - Spillages and uncontrolled releases;
 - Failure of any equipment;
 - Plant or equipment failure (e.g. blocked drains);
 - Contaminated firewater;
 - Vandalism; and
 - Flooding.
- Identify events or failures that could damage the environment.
- Assesses the likelihood and the potential environmental consequences from accidents at the site.
- Proposes action to minimise the potential causes and consequences of accidents.

In the event of an accident, the EA will be immediately informed and necessary measures to limit the environmental impact of the accident will be carried out, as well as measures to prevent further possible accidents.

5.6.2 Incident Response

The reporting of incidents and non-conformities forms a key component of the sites Environmental Management System (EMS). Identified non-conformities under the system include, but are not limited to the following:

- Non-compliance to any permitted conditions or consent limit (excessive waste being stored, missing of reporting deadlines, breach of any permitted limits etc);
- Internal Audit findings (legal non-compliances, EMS procedural breaches, system non-compliances);
- External and Internal Complaints; and
- Whenever a plant malfunction, breakdown or failure, or any near miss occurs.

The company's EMS will undergo periodic external audit and review to ensure that both compliance and continuous improvement is achieved. The EMS requires that all identified incidents, and non-conformities will be investigated and closed out.

5.6.3 Fire Prevention Plan

Due to the proposed operations, PSL will operate the waste storage operations in accordance with a Fire Prevention Plan that has been written to comply with the latest EA Guidance '*Fire prevention plans: environmental permits.*'

In the event of a fire onsite, the drainage systems will be isolated via penstock valve so all potentially contaminated firewater will be contained onsite within the sealed drainage system.

The Albert Johnson Quay storage area and drainage system allows a total containment capacity of 250,000 litres.

Please refer to the site's Fire Prevention Plan provided within Annex D – Fire Prevention Plan for a full description of fire prevention measures implemented on site.

6. EMISSIONS

6.1 Emission to Air

There will be no point source emissions to air as a result of the proposed waste operation.

6.2 Emissions to Controlled Water

There will be no emissions to controlled water arising from the proposed waste operation.

All external (clean) surface water runoff will drain into an attenuation tank via an interceptor before being discharged to public surface water.

During periods when waste is stored onsite, the drainage system will be isolated through use of a penstock valve. Surface water run-off collected during this period within the interceptor and drainage system will be tankered offsite for disposal.

6.3 Emissions to Sewer

There are no point source emissions to sewer from the proposed operation.

6.4 Emissions to Ground or Land

There will be no emissions to land arising from the proposed operation.

6.5 Odour

Although the wastes accepted on site are not considered to be significantly odorous, it is accepted that there is a potential for odorous emissions from waste handling operations at the site, albeit covered waste during transit and enclosure of waste in storage, reduces the potential impact of odour.

An Odour Management Plan has been produced to practically manage and control potential odour emissions generated onsite. .

The primary prevention and control measure employed by the site to control and prevent the potential odour releases from site is the use of stringent waste acceptance procedures.

If any incoming waste load arrives at the weighbridge, which is deemed excessively malodorous, then the weighbridge staff will reject the load from the site. No malodorous materials will be accepted on site. Any biodegradable materials accepted onsite will be stored for as short a duration and in as low a quantity as practically possible.

Additional management techniques will include:

- Delivery of wastes in covered vehicles;
- Short turn-around times;
- Minimising handling;
- Storage of RDF in wrapped bales preventing escape of potentially odorous air emissions;
- Covering of waste piles where required, for example in hot weather;
- Good housekeeping measures.

Although minimal odour from the site is anticipated, odour shall be routinely monitored at points around the site boundary and observations shall be noted in the site diary and/or on a daily monitoring document.

In the event that there is any discernible odour detected at the site boundary and the odour is judged to be 'moderate' (i.e. Odour Intensity Rank 3), then the Site Manager will be notified immediately, and the olfactory survey will continue to attempt to determine the source and extent of the odour plume, as follows:

- A suitable location downwind of the site and potentially sensitive receptor at which the odour plume is unlikely to extend will be selected for assessment;
- Survey will continue toward the facility until a site-related odour is perceived; and
- Assessment points perpendicular to the plume axis and equidistant from the site will then be monitored, subject to access requirements.

The main aim of monitoring will be to test if any odours emitted from the site will be causing the nearest receptors nuisance. In scenarios where nuisance is being caused then acceptance of waste will be suspended until the conditions improve. The Site Manager may deem it necessary to find the precise source of the odour and attempt to eliminate it or neutralise it immediately.

The full Odour Management Plan has been provided in Annex C – Odour Management Plan.

6.6 Noise

PSL currently operates over 100 deliveries a day and is located within an industrial area within Portsmouth Port. The closest residential area is separated by a scrap metal yard and the M275.

The marginal increase of transports occurring as a result of this proposal would have a negligible impact on receptors, given the site's surroundings and current activities, and as such, a Noise Impact Assessment has not been deemed necessary for inclusion within the permit application.

6.7 Dust

The site will operate in accordance with a stringent Dust Management Plan in order to effectively manage and control any potential dust emissions from the storage and handling of waste onsite.

It is not considered that the activities undertaken on site will generate significant quantities of dust. The waste types accepted on site and stored externally comprise non-hazardous shredded tyre, wood pellets and RDF. These waste types do not contain significant quantities of dust and, as such, do not pose a significant risk of dust emissions. Waste soils will be stored internally within an enclosed building, and will arrive on site in construction bags and remain in those bags until transferred offsite.

All waste arrives on site pre-processed, covered and in the case of RDF, triple wrapped and baled. The site also operates a "dusty waste policy" by which, if waste arrives on site but is deemed to be excessively dusty, it will be rejected from the site.

The main potential source of fugitive emissions to air relates to dust emissions that could potentially arise from the various loading and unloading activities associated with the storage of loose waste materials such as shredded wood. However, these materials are strictly controlled through the Dust Management Plan. Furthermore, soil waste is exclusively stored within Shed 14 to prevent dust emissions.

When wastes that have the potential to release dust are received on site, the site takes the following measures to ensure minimal dust has the potential to escape to air:

- Unloading of potentially dusty materials will be conducted within one of the internal bays located within Shed 14 to minimise the release of uncontrolled dust emissions.
- Minimisation of double handling where possible.
- Covering stockpiles that may be exposed to external conditions.
- Dust suppression (if required) for waste prior to onward transportation to the quayside.
- General site and plant maintenance, including road cleaning, wheel washing and inspections.

The sites Dust Management Plan is provided in Annex E – Dust Management Plan.

6.8 Pest Management

Due to the periodical nature of waste storage onsite and short turnaround times, it is not considered that the storage of waste onsite will pests will become a problem. However, the site will continue to operate in such a way as to prevent pests where possible and will implement ad Pest management Plan if this ever became an issue.

7. ENVIRONMENTAL MONITORING

7.1 Emissions to Air

There are no point source process emissions to air; therefore, no monitoring is required.

7.2 Emissions to Controlled Water

There are no emissions to controlled water as part of this application, and as such, there will be no associated monitoring carried out on site.

7.3 Emissions to Sewer

There are no emissions to sewer as part of this application, and as such, there will be no associated monitoring carried out on site.

7.4 Emissions to Land

There are no emissions to land as part of this application, and as such, there will be no associated monitoring carried out on site.

7.5 Odour

As part of the site's OMP, olfactory odour monitoring has been proposed at a minimum frequency of 1 survey per day when waste is present onsite. The surveys shall be carried out in accordance with the monitoring protocol contained in the EA's *Technical Guidance Note H4*. Records of all odour surveys shall be kept on site as part of the site's Duty of Care responsibilities.

A recording of Odour Intensity Rank 3 or more during routine olfactory monitoring or the receipt of a complaint will necessitate further investigation into the causes and indicate whether further monitoring is required. Actions to be taken in the event of an exceedance will be dictated by the nature and extent of the exceedance(s) (e.g., by considering the magnitude of exceedance and whether it was event driven or on-going).

A review of the site activities, meteorological conditions and effectiveness of control produces will be undertaken on detection of a moderate odour.

The full monitoring to be undertaken on site can be seen in the OMP in Annex C – Odour Management Plan.

8. IMPACTS TO THE ENVIRONMENT

8.1 Impacts to Air

There are no point source emissions to the environment, therefore there is no air impact associated with this application.

8.2 Impacts to Controlled Waters

There are no impacts to controlled water relating to the proposed waste operation.

8.3 Impacts to Land

There will be no impacts to land arising from any of the operations associated with the proposed waste operation.

8.4 Impacts to Sewer

There will be no impacts to sewer arising from any of the operations associated with the proposed waste operation.

APPENDIX A

APPENDIX TITLE

Date