

BAT and Appropriate Measures Compliance Assessment

The proposed variation seeks to increase the permitted hazardous waste storage capacity at the installation. No new waste treatment activities are proposed and no significant changes are proposed to waste acceptance procedures, storage methods, containment arrangements, emergency response procedures or environmental control systems. The increase in storage capacity will be managed using existing infrastructure and management systems which have been developed in accordance with the Environment Agency's Appropriate Measures guidance and the Waste Treatment BAT Conclusions. Existing controls include waste pre-acceptance and acceptance procedures, documented storage standards, segregation of incompatible wastes, engineered containment systems, fire prevention measures, routine inspection programmes, staff competency management and accident response arrangements. These controls will continue to apply to all wastes received and stored under the varied permit.

Aspect	Existing Position	Proposed Position	BAT Impact
Waste Types	No Change	No Change	No Impact
Waste Treatment	No Change	No Change	No Impact
Storage methodology	Existing Procedure DOC-000162	No Change	No Impact
Drainage System	Existing contained drainage	No Change	No Impact
Fire Prevention Arrangements	Existing FPP	Updated to reflect increased storage quantities	Improved
Environmental emissions	Controlled through existing infrastructure and procedures	No Increase expected	No Impact

The increase in storage capacity is primarily intended to regularise storage limits imposed during the previous permit determination. The site has historically managed equivalent waste inventories using the same storage infrastructure, inspection regimes, containment systems and trained personnel. As such, the proposed variation does not necessitate any fundamental change to operational controls and the facility will continue to operate in accordance with Best Available Techniques and Environment Agency Appropriate Measures guidance.

BAT/Appropriate Measure	Evidence
Waste Pre-Acceptance Procedures	Waste Pre acceptance procedure dated August 2026
Waste Acceptance Procedures	Waste Acceptance Procedure dated August 2026
Fire Prevention	Fire Prevention Plan dated August 2026
Drainage and Containment	Environmental risk assessment and drainage plan
Staff competency	Training matrix on learning management system, Competency management system training for all relevant staff
Site Inspections	Daily, weekly and monthly inspection by various members of staff, documented on EVOTIX system and monitored by management. Also annual detailed audits by HSEQ department.
Waste Storage	Storage Procedure DOC-000162

The proposed increase in hazardous waste storage capacity does not result in any change to the nature of operations undertaken at the installation, nor does it introduce any new emission pathways or environmental receptors. The installation will continue to operate in accordance with the Environmental Risk Assessment, Fire Prevention Plan, Waste Acceptance Procedures, Waste Storage Procedure DOC-000162, Accident Management Procedures and Environmental Management System. Collectively these measures demonstrate continued compliance with the Waste Treatment BAT Conclusions and Environment Agency Appropriate Measures guidance.