



Operating Techniques and Waste Acceptance Procedures

Otterpool Waste Transfer Station Environmental Permit Application

Countrystyle Recycling Limited

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Basis of Report

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1.0 INTRODUCTION

Countrystyle Recycling Limited (CRL) has retained SLR Consulting Limited (SLR) to prepare a bespoke Environmental Permit (EP) application for the proposed Otterpool Waste Transfer Station (WTS), located in Ashford, Kent under the Environmental Permitting (England and Wales) Regulations (as amended) 2016.

This Operating Techniques (OT) and Waste Acceptance Procedure (WAP) document sets out best practice for operating the site, based on legislation and best available techniques in the industry. In addition, the document details the WAP to 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 Environmental Risk Assessment.

The OT and WAP has been drafted to ensure compliance with the EA's guidance '*Develop a Management System: Environmental Permits*¹', last updated April 2023, in addition to the '*Non-Hazardous and Inert Waste: Appropriate Measures for Permitted Facilities*²' guidance updated August 2023, and the '*Healthcare Waste: Appropriate Measures for Permitted Facilities*³', guidance updated December 2021.

The OT and WAP will be reviewed and updated on an annual basis or because of any of the following activities (list not exhaustive):

- The issue of an EP variation by the Environment Agency (EA);
- Finalisation of site construction;
- A material change to the operational process;
- A substantiated complaint; or
- Any changes in legislation or guidance documents applicable to the operations undertaken at Otterpool WTS.

This OT document is supplemented by the following documents submitted in addition to this EP application;

- Application Forms (Parts A, B2, B4, and F1);
- Non-Technical Summary (NTS);
- Environmental (Amenity) Risk Assessment (ERA);
- Fire Prevention Plan (FPP);
- Dust Management Plan (DMP);
- Noise Impact Assessment and Management Plan (NIAMP);
- Odour Management Plan (OMP);
- H5 Site Condition Report (SCR); and
- Associated drawings.

CRL is fully conversant with its environmental responsibilities in relation to the site, and is committed to ensuring that its relevant facilities are designed, constructed and operated to

¹ [Develop a management system: environmental permits - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/develop-a-management-system-environmental-permits)

² [Non-hazardous and inert waste: appropriate measures for permitted facilities - Guidance - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/non-hazardous-and-inert-waste-appropriate-measures-for-permitted-facilities)

³ [Healthcare waste: appropriate measures for permitted facilities - Guidance - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/healthcare-waste-appropriate-measures-for-permitted-facilities)



the highest possible standards. It is intended that this will be clear from the detail contained within this OT and WAP.

1.1 Site Location

The site is located on Ashford Road, Kent, TN25 6DA centred on National Grid Reference (NGR) TR 11237 36597. The town of Ashford is located approximately 11km north-west of the site.

The area surrounding the site comprises predominantly agricultural / open land. The English Channel is situated approximately 4.6km south / south-east, and the East Stour Rivers flows in a west-east direction approximately 320m north of the site at its closest point.

The site will be accessed via the A20 Ashford Road which runs adjacent to the site's northern EP boundary. The closest residential receptors are individual properties situated approximately 160m north west, 120m west, 220m south, and 240m east.

The site's location is illustrated on Drawing 01, and the EP Boundary and Site Layout are illustrated in Drawing 02. Local receptors within a 500m radius of the site are shown on Drawing 03, and Cultural and Natural Heritage Receptors on Drawing 04.

Table 1-1 below summarises the surrounding land uses.

Table 1-1: Surrounding Land Uses

Boundary	Description
North	Adjacent to the north is the A20 Ashford Road. Immediately beyond this is a commercial/industrial premises, followed by open ground, and the East Stour River.
East	Immediately to the east lies Otterpool Quarry Site of Special Scientific Interest (SSSI), followed by an individual residential property called Mink Farm. The land beyond this predominantly comprises open/agricultural land.
South	Otterpool Quarry SSSI lies immediately south of the site, followed by Upper Otterpool residential property. Open/agricultural land also lies in this direction.
West	The B2067 lies approximately 130m to the west. Land around this largely comprises open / agricultural land, in addition to Otterpool Manor, and Barrow Hill Farm Cottages residential properties, and a small commercial/industrial area.

1.2 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 is divided into the following sections:

- **Section 1** Introduction
- **Section 2** General management and appropriate measures
- **Section 3** Operations
- **Section 4** Waste pre-acceptance, acceptance and tracking
- **Section 5** Waste storage
- **Section 6** Waste treatment
- **Section 7** Emissions control
- **Section 8** Emissions monitoring and limits



- **Section 9** Waste minimisation, recovery and disposal
- **Section 10** Information

1.3 Document Revision

Any changes to the OT and WAP will be labelled in chronological order, and the date of the change recorded. All records of the changes will be listed in the revision history in Table 1-2 below:

Table 1-2: Revision History

Version	Reason for Revision	Date of Revision	Signature of Site Manager

2.0 General Management Appropriate Measures

2.1 Management System

The site will be operated in accordance with CRL’s ISO 140001 management system and this site specific OT and WAP document 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 and OT and WAP document;
- 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 and WAP at the site and demonstrates conformance with the requirements of relevant 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 waste, or 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 relating to:

- 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 ensure 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 EP 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 WAP 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 will be in place, including;

- The site will be manned during operational hours by site staff 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.

All 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 by site operatives at the commencement of each working day. Any defects or damage which compromises the integrity of the enclosures 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 Display of EP

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.

2.6 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.

2.6.1 Permit Surrender

A SCR dated December 2023, was prepared by CRL in support of the EP application. The SCR sets out the baseline conditions of the site for comparison at the point of EP surrender.

The SCR will be updated during the operational life of the site as appropriate. To assist with permit surrender, records will be maintained to demonstrate how the land has been protected at all times between the date of EP issue and surrender.

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 in the scope of 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 storage and dispatches. All records relating to waste acceptance will be maintained and kept readily available on site and kept for a minimum of 2 years, and will be made available for inspection by the EA at all reasonable times.

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 procedures 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;
- 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 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 will review environmental performance, and ensure any necessary actions are taken.

2.11 Operational Control, Preventative Maintenance and Calibration

The management system contains operational procedures that will ensure effective control of site operations, the use of approved suppliers, and contract services, the maintenance of operational equipment and 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 CQA 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 that the site and 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 will be 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 EA will be notified upon detection of any of the events detailed in Section 3.1.

The following 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 Hazard Identification

The following potential hazards have been identified in the ERA that was prepared using the ERA methodology and has been submitted in support of this EP application (ref. 402.065068.00001/ERA):

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

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

3.1.1 Unauthorised Waste

The acceptance of unauthorised materials could result in unacceptable wastes being accepted, and stored at the site. WAP, outlined within this document will be implemented on site with strict enforcement to ensure that no unauthorised waste is accepted. All wastes will be subject to inspection and checking against 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/isolation area prior to export from site, to an alternative suitably permitted facility.

3.1.2 Fire

The site will operate under an agreed FPP, prepared by CRL. A copy of the FPP will be available on site at all times.

The plan follows EA guidance for FPPs⁴, and details the required mitigation and management methods to prevent a fire of combustible materials stored on site. The

⁴ [Fire prevention plans: environmental permits - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/fire-prevention-plans-environmental-permits)



information contained within the FPP aims to meet the 3 main objectives of the EA's GPP Guidance:

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

3.1.3 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 flowing outside the EP boundary. The spillage will be cleared immediately and placed in containers for offsite disposal, and the EA will be informed.

3.1.4 Security and Vandalism

In order to prevent unauthorised access, a number of site security measures will be in place, including;

- Site perimeter: the site benefits from 2.4m high palisade security fencing around the perimeter;
- CCTV: an internal and external CCTV monitoring system will cover the full extent of the site, and will be able to be monitored remotely;



- Inspection: gates and fencing extending around the site will be inspected daily by the operations staff to identify deterioration and damage, and the need for any repairs;
- Maintenance and repair: fencing 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. The site will be manned throughout operational hours by site staff.

In the event of a breach of security at the site, the cause will be investigated, and appropriate mitigation measures implemented. This will be recorded in the Site Diary. Records maintained will include inspections and maintenance of security fencing and the gate, breaches of security, investigations and actions taken.

3.1.5 Flooding

There are no surface water features within the EP boundary. The site lies within a flood zone 1 and therefore has a low probability of flooding.

In the event that an accident occurs, or additional risks are identified, the Site Manager will be responsible for carrying out an investigation to determine the cause and implementing remedial action prior to logging this in the Site Diary.

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 proposed Otterpool WTS will accept up to 95,000 tonnes per annum (tpa) of predominantly non-hazardous mixed waste with a small proportion of that consisting of clinical waste (approximately 12,000 tpa) including nappies and sharps.

4.1 Process Description

Non-hazardous waste will be accepted on site for storage and bulking up prior to transfer to a suitably permitted alternative facility for further recovery or disposal.

The proposed site will consist of a WTS building, housing designated concrete bays and containers for the storage of waste including co-mingled recyclable materials, bulky waste, paper and cardboard, residual waste, street sweepings, garden waste, clinical waste, and food waste, as illustrated on Drawing 02.



Treatment on site will only consist of manual sorting, and separation, storage, bulking up and transfer off site for further recover/disposal.

4.1.1 Clinical Waste Transfer Station

It is proposed that the site will accept a small amount of clinical waste consisting of nappies and sharps (approximately 12,000 tpa). Clinical waste will be stored within designated bays/containers inside the WTS building, as illustrated on Drawing 02. The WTS building will benefit from impermeable surfacing and a sealed drainage system throughout.

There will be no treatment of clinical waste undertaken on the site, only storage and bulking up prior to transfer to a suitably permitted alternative facility for further recovery or disposal. Clinical waste will be stored for a maximum of 5 days.

Clinical waste will be stored and handled, as described in the site’s OT document and in accordance with the EA’s Guidance “*Healthcare waste: appropriate measures for permitted facilities*”⁵.

4.2 Specified Waste Management Activities

The activities that will be carried out at the site as defined under Annex II of the Waste Framework Directive can be summarised as follows:

- **R3:** Recycling or reclamation of organic substances which are not used as solvents;
- **R4:** Recycling or reclamation of metals and metal compounds;
- **R5:** Recycling or reclamation of other inorganic materials;
- **R13:** Storage pending recovery or disposal.

4.3 Waste Types and Storage

The site will accept up to 95,000 tpa of waste, of which approximately 12,000 tpa will consist of clinical waste.

Up to 1,500 tonnes of waste will be stored on site at any one time and the site will be capable of accepting up to 300 tonnes per day.

Waste will be stored for a maximum of 5 days.

The proposed waste lists for the site are as listed below in Table 4-1, and Table 4-2.

Table 4-1 Proposed Non-Hazardous Waste Types to be Accepted at the Site

EWC Code	Description
01	WASTES RESULTING FROM EXPLORATION, MINING, QUARRYING, AND PHYSICAL AND CHEMICAL TREATMENT OF MINERALS
01 01	Wastes from mineral excavation
01 01 01	Wastes from mineral metalliferous excavation
01 01 02	Wastes from mineral non-metalliferous excavation
01 03	Wastes from physical and chemical processing of metalliferous minerals
01 03 06	Tailings other than those mentioned in 01 03 04 and 01 03 05

⁵ [Healthcare waste: appropriate measures for permitted facilities - Waste storage, segregation and handling appropriate measures - Guidance - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/healthcare-waste-appropriate-measures-for-permitted-facilities-waste-storage-segregation-and-handling-appropriate-measures), accessed November 2023



EWC Code	Description
01 03 09	Red mud from alumina production other than the wastes mentioned in 01 03 07
01 04	Wastes from physical and chemical processing of non-metalliferous minerals
01 04 08	Waste gravel and crushed rocks other than those mentioned in 01 04 07
01 04 09	Waste sand and clays
01 04 11	Wastes from potash and rock salt processing other than those mentioned in 01 04 07
01 04 12	Tailings and other wastes from washing and cleaning of minerals other than those mentioned in 01 04 07 and 01 04 11
01 04 13	Wastes from stone cutting and sawing other than those mentioned in 01 04 07
02	WASTES FROM AGRICULTURE HORTICULTURE AQUACULTURE FORESTRY HUNTING AND FISHING FOOD PREPARATION AND PROCESSING
02 01	Wastes from agriculture, horticulture, forestry, hunting and fishing
02 01 03	Plant-tissue waste
02 01 04	Waste plastics (except packaging)
02 01 07	Wastes from forestry
02 01 10	Waste metal
02 02	Wastes from the preparation and processing of meat, fish and other foods of animal origin
02 02 03	Materials unsuitable for consumption or processing
02 03	Wastes from fruit, vegetables, cereals, edible oils, cocoa, coffee, tea and tobacco preparation and processing; conserve production; yeast and yeast extract production, molasses preparation and fermentation
02 03 04	Materials unsuitable for consumption or processing
02 04	Wastes from sugar processing
02 04 01	Soil from cleaning and washing beet
02 04 02	Off-specification calcium carbonate
02 05	Wastes from the dairy products industry
02 05 01	Materials unsuitable for consumption or processing
02 06	Wastes from the baking and confectionery industry
02 06 01	Materials unsuitable for consumption or processing
02 06 02	Wastes from preserving agents
02 07	Wastes from the production of alcoholic and non-alcoholic beverages (except coffee, tea, and cocoa)
02 07 01	Wastes from washing, cleaning and mechanical reduction of raw materials
02 07 02	Wastes from spirits distillation



EWC Code	Description
02 07 04	Materials unsuitable for consumption or processing
03	WASTES FROM WOOD PROCESSING, AND THE PRODUCTION OF PANELS AND FURNITURE, PULP, PAPER AND CARDBOARD
03 01	Wastes from wood processing and the production of panels and furniture
03 01 01	Waste bark and cork
03 01 05	Sawdust, shavings, cuttings, wood, particle board and veneer other than those mentioned in 03 01 04
03 03	Wastes from pulp, paper and cardboard production and processing
03 03 01	Waste bark and wood
03 03 07	Mechanically separated rejects from pulping of waste paper and cardboard
03 03 08	Wastes from sorting of paper and cardboard destined for recycling
03 03 10	Fibre rejects, fibre-, filler- and coating-sludges from mechanical separation
04	WASTES FROM THE LEATHER, FUR AND TEXTILE INDUSTRIES
04 01	Wastes from the leather and fur industry
04 01 08	Waste tanned leather (blue sheetings, shavings, cuttings, buffing dust) containing chromium
04 01 09	Wastes from dressing and finishing
04 02	Wastes from the textile industry
04 02 21	Wastes from unprocessed textile fibres
04 02 22	Wastes from processed textile fibres
06	WASTES FROM INORGANIC CHEMICAL PROCESSES
06 09	Wastes from the MSFU of phosphorous chemicals and phosphorous chemical processes
06 09 02	Phosphorous slag
06 09 04	Calcium-based reaction wastes other than those mentioned in 06 09 03
06 11	Wastes from the manufacture of inorganic pigments and opacifiers
06 11 01	Calcium-based reaction wastes from titanium dioxide production
07	WASTES FROM ORGANIC CHEMICAL PROCESSES
07 02	Wastes from the MFSU of plastics, synthetic rubber and man-made fibres
07 02 13	Waste plastic
09	WASTES FROM THE PHOTOGRAPHIC INDUSTRY
09 01	Wastes from the photographic industry
09 01 07	Photographic film and paper containing silver or silver compounds
09 01 08	Photographic film and paper free of silver or silver compounds
09 01 10	Single-use cameras without batteries



EWC Code	Description
09 01 12	Single-use cameras containing batteries other than those mentioned in 09 01 11
10	WASTES FROM THERMAL PROCESSES
10 01	Wastes from power stations and other combustion plants (except 19)
10 01 01	Bottom ash, slag and boiler dust (excluding boiler dust mentioned in 10 01 04)
10 01 05	Calcium-based reaction wastes from flue-gas desulphurisation in solid form
10 01 07	Calcium-based reaction wastes from flue-gas desulphurisation in sludge form
10 01 15	Bottom ash, slag and boiler dust from co-incineration other than those mentioned in 10 01 14
10 01 19	Wastes from gas cleaning other than those mentioned in 10 01 05, 10 01 07 and 10 01 18
10 01 24	Sands from fluidised beds
10 02	Wastes from the iron and steel industry
10 02 01	Wastes from the processing of slag
10 02 02	Unprocessed slag
10 02 08	Solid wastes from gas treatment other than those mentioned in 10 02 07
10 02 10	Mill scales
10 02 14	Filter cakes from gas treatment other than those mentioned in 10 02 13
10 02 15	Other filter cakes
10 03	Wastes from aluminium thermal metallurgy
10 03 02	Anode scraps
10 03 05	Waste alumina
10 03 16	Skimmings other than those mentioned in 10 03 15
10 03 18	Carbon-containing wastes from anode manufacture other than those mentioned in 10 03 17
10 03 24	Solid wastes from gas treatment other than those mentioned in 10 03 23
10 03 26	Filter cakes from gas treatment other than those mentioned in 10 03 25
10 03 28	Wastes from cooling-water treatment other than those mentioned in 10 03 27
10 03 30	Wastes from treatment of salt slags and black drosses other than those mentioned in 10 03 29
10 04	Wastes from lead thermal metallurgy
10 04 10	Wastes from cooling-water treatment other than those mentioned in 10 04 09
10 05	Wastes from zinc thermal metallurgy
10 05 01	Slags from primary and secondary production
10 05 09	Wastes from cooling-water treatment other than those mentioned in 10 05 08
10 05 11	Dross and skimmings other than those mentioned in 10 05 10



EWC Code	Description
10 06	Wastes from copper thermal metallurgy
10 06 01	Slags from primary and secondary production
10 06 02	Dross and skimmings from primary and secondary production
10 06 10	Wastes from cooling-water treatment other than those mentioned in 10 05 10
10 07	Wastes from silver, gold and platinum thermal metallurgy
10 07 01	Slags from primary and secondary production
10 07 02	Dross and skimmings from primary and secondary production
10 07 03	Solid wastes from gas treatment
10 07 05	Filter cakes from gas treatment
10 07 08	Wastes from cooling-water treatment other than those mentioned in 10 07 07
10 08	Wastes from other non-ferrous thermal metallurgy
10 08 09	Other slags
10 08 11	Dross and skimmings other than those mentioned in 10 08 10
10 08 13	Carbon-containing wastes from anode manufacture other than those mentioned in 10 08 12
10 08 14	Anode scrap
10 08 18	Filter cakes from flue-gas treatment other than those mentioned in 10 08 17
10 08 20	Wastes from cooling-water treatment other than those mentioned in 10 08 19
10 09	Wastes from casting of ferrous pieces
10 09 03	Furnace slag
10 09 06	Casting cores and moulds which have not undergone pouring other than those mentioned in 10 09 05
10 09 08	Casting cores and moulds which have undergone pouring other than those mentioned in 10 09 07
10 09 14	Waste binders other than those mentioned in 10 09 13
10 09 16	Waste crack-indicating agent other than those mentioned in 10 09 15
10 10	Wastes from casting of non-ferrous pieces
10 10 03	Furnace slag
10 10 06	Casting cores and moulds which have not undergone pouring, other than those mentioned in 10 10 05
10 10 08	Casting cores and moulds which have undergone pouring, other than those mentioned in 10 10 07
10 10 14	Waste binders other than those mentioned in 10 10 13
10 10 16	Waste crack-indicating agent other than those mentioned in 10 10 15
10 11	Wastes from manufacture of glass and glass products
10 11 03	Waste glass-based fibrous materials



EWC Code	Description
10 11 10	Waste preparation mixture before thermal processing, other than those mentioned in 10 11 09
10 11 12	Waste glass other than those mentioned in 10 11 11
10 11 16	Solid wastes from flue-gas treatment other than those mentioned in 10 11 15
10 11 18	Filter cakes from flue-gas treatment other than those mentioned in 10 11 17
10 12	Wastes from manufacture of ceramic goods, bricks, tiles and construction products
10 12 01	Waste preparation mixture before thermal processing
10 12 05	Filter cakes from gas treatment
10 12 06	Discarded moulds
10 12 08	Waste ceramics, bricks, tiles and construction products (after thermal processing)
10 12 10	Solid wastes from gas treatment other than those mentioned in 10 12 09
10 12 12	Wastes from glazing other than those mentioned in 10 12 11
10 13	Wastes from the manufacture of cement, lime, and plaster and articles and products made from them
10 13 01	Waste preparation mixture before thermal processing
10 13 04	Wastes from calcination and hydration of lime
10 13 07	Filter cakes from gas treatment
10 13 10	Wastes from asbestos-cement manufacture other than those mentioned in 10 13 09
10 13 11	Wastes from cement-based composite materials other than those mentioned in 10 13 09
10 13 13	Solid wastes from gas treatment other than those mentioned in 10 13 12
10 13 14	Waste concrete
11	WASTES FROM CHEMICAL SURFACE TREATMENT AND COATING OF METALS AND OTHER MATERIALS; NON-FERROUS HYDRO METALLURGY
11 01	Wastes from chemical surface treatment and coating of metals and other materials (for example galvanic processes, zinc coating processes, pickling processes, etching, phosphating, alkaline degreasing, anodising)
11 01 10	Filter cakes other than those mentioned in 11 01 09
11 01 14	Degreasing wastes other than those mentioned in 11 01 13
11 02	Wastes from non-ferrous hydrometallurgical processes
11 02 03	Wastes from the production of anodes for aqueous electrolytical processes
11 02 06	Wastes from copper hydrometallurgical processes other than those mentioned in 11 02 05
11 05	Wastes from hot galvanising processes



EWC Code	Description
11 05 01	Hard zinc
11 05 02	Zinc ash
12	WASTES FROM SHAPING AND PHYSICAL AND MECHANICAL SURFACE TREATMENT OF METALS AND PLASTICS
12 01	Wastes from shaping and physical and mechanical surface treatment of metals and plastics
12 01 01	Ferrous metal filings and turnings
12 01 03	Non-ferrous metal filings and turnings
12 01 05	Plastic shavings and turnings
12 01 13	Welding wastes
12 01 17	Waste blasting material other than those mentioned in 12 01 16
12 01 21	Spent grinding bodies and grinding materials other than those mentioned in 12 01 20
15	WASTE PACKAGING: ABSORBENTS, WIPING CLOTHS, FILTER MATERIALS AND PROTECTIVE CLOTHING NOT OTHERWISE SPECIFIED
15 01	Packaging (including separately collected municipal packaging waste)
15 01 01	Paper and cardboard packaging
15 01 02	Plastic packaging
15 01 03	Wooden packaging
15 01 04	Metallic packaging
15 01 05	Composite packaging
15 01 06	Mixed packaging
15 01 07	Glass packaging
15 01 09	Textile packaging
15 02	Absorbents, filter materials, wiping cloths and protective clothing
15 02 03	Absorbents, filter materials, wiping cloths, and protective clothing other than those mentioned in 15 02 02
16	WASTES NOT OTHERWISE SPECIFIED IN THE LIST
16 01	End-of-life vehicles from different means of transport (including off-road machinery) and wastes from dismantling of end-of-life vehicles and vehicle maintenance (except 13, 14, 16 06 and 16 08)
16 01 03	End-of-life tyres
16 02	Wastes from electrical and electronic equipment
16 02 14	Discarded equipment other than those mentioned in 16 02 09 to 16 02 13
16 02 16	Components removed from discarded equipment other than those mentioned in 16 02 15
16 03	Off-specification batches an unused products



EWC Code	Description
16 03 04	Inorganic wastes other than those mentioned in 16 03 03
16 03 06	Organic wastes other than those mentioned in 16 03 05
16 06	Batteries and accumulators
16 06 04	Alkaline batteries (except 16 06 03)
16 06 05	Other batteries and accumulators
16 11	Waste linings and refractories
16 11 02	Carbon-based linings and refractories from metallurgical processes other than those mentioned in 16 011 01
16 11 04	Other linings and refractories from metallurgical processes other than those mentioned in 16 11 03
16 11 06	Linings and refractories from non-metallurgical processes other than those mentioned in 16 11 05
17	CONSTRUCTION AND DEMOLITION WASTES (INCLUDING EXCAVATED SOIL FROM CONTAMINATED SITES)
17 01	Concrete, bricks, tiles and ceramics
17 01 01	Concrete
17 01 02	Bricks
17 01 03	Tiles and ceramics
17 01 07	Mixtures of concrete, bricks, tiles and ceramics other than those mentioned in 17 01 06
17 02	Wood, glass and plastic
17 02 01	Wood
17 02 02	Glass
17 02 03	Plastic
17 03	Bituminous mixtures, coal tar and tarred products
17 03 02	Bituminous mixtures other than those mentioned in 17 03 01
17 04	Metals (including their alloys)
17 04 01	Copper, bronze, brass
17 04 02	Aluminium
17 04 03	Lead
17 04 04	Zinc
17 04 05	Iron and steel
17 04 06	Tin
17 04 07	Mixed metals
17 04 11	Cables other than those mentioned in 17 04 10
17 05	Soil (including excavated soil from contaminated sites) stones and dredging spoil



EWC Code	Description
17 05 04	Soil and stones other than those mentioned in 17 05 03
17 05 08	Track ballast other than those mentioned in 17 05 07
17 06	Insulation materials and asbestos-containing construction materials
17 06 04	Insulation materials other than those mentioned in 17 06 01 and 17 06 03
17 08	Gypsum-based construction material
17 08 02	Gypsum-based construction materials other than those mentioned in 17 08 01
17 09	Other construction and demolition wastes
17 09 04	Mixed construction and demolition wastes other than those mentioned in 17 09 01, 17 09 02, and 17 09 03
19	WASTES FROM WASTE MANAGEMENT FACILITIES, OFF-SITE WASTE WATER TREATMENT PLANTS AND PREPARATION OF WATER INTENDED FOR HUMAN CONSUMPTION/INDUSTRIAL USE
19 01	Wastes from incineration or pyrolysis of waste
19 01 02	Ferrous materials removed from bottom ash
19 01 12	Bottom ash and slag other than those mentioned in 19 01 11
19 01 18	Pyrolysis wastes other than those mentioned in 19 01 17
19 01 19	Sands from fluidised beds
19 02	Wastes from physico/chemical treatments of waste (including dechromatation, decyanidation, neutralisation)
19 02 03	Premixed wastes composed only of non-hazardous waste
19 02 10	Combustible wastes other than those mentioned in 19 02 08 and 19 02 09
19 04	Vitrified waste and wastes from vitrification
19 04 01	Vitrified waste
19 05	Wastes from aerobic treatment of solid wastes
19 05 01	Non-composted fraction of municipal and similar wastes
19 05 02	Non-composted fraction of animal and vegetable waste
19 05 03	Off-specification compost
19 12	Wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified
19 12 01	Paper and cardboard
19 12 02	Ferrous metal
19 12 03	Non-ferrous metal
19 12 04	Plastic and rubber
19 12 05	Glass
19 12 07	Wood other than that mentioned in 19 12 06
19 12 08	Textiles



EWC Code	Description
19 12 09	Minerals (for example sand, stones)
19 12 10	Combustible waste (refuse derived fuel)
19 13	Wastes from soil and groundwater remediation
19 13 02	Solid wastes from soil remediation other than those mentioned in 19 13 01
20	MUNICIPAL WASTES (HOUSEHOLD WASTE AND SIMILAR COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL WASTES) INCLUDING SEPARATELY COLLECTED FRACTIONS
20 01	Separately collected fractions (except 15 01)
20 01 01	Paper and cardboard
20 01 02	Glass
20 01 08	Biodegradable kitchen and canteen waste
20 01 10	Clothes
20 01 11	Textiles
20 01 34	Batteries and accumulators other than those mentioned in 20 01 33
20 01 36	Discarded electrical and electronic equipment other than those mentioned in 20 01 21, 20 10 23, and 20 01 35
20 01 38	Wood other than that mentioned in 20 01 37
20 01 39	Plastics
20 01 40	Metals
20 01 41	Wastes from chimney sweeping
20 02	Garden and park wastes (including cemetery waste)
20 02 01	Biodegradable waste
20 02 02	Soil and stones
20 03	Other municipal wastes
20 03 01	Mixed municipal waste
20 03 02	Waste from markets
20 03 03	Street-cleaning residues
20 03 07	Bulky waste

Table 4-2 Proposed Clinical Waste Types to be Accepted at the Site

EWC Code	Description
09	WASTES FROM THE PHOTOGRAPHIC INDUSTRY
09 01	Wastes from the photographic industry



EWC Code	Description
09 01 01*	Water-based developer and activator solutions ⁶
09 01 02*	Water-based offset plate developer solutions ³
09 01 03*	Solvent based developer solutions ³
09 01 04*	Fixer solutions ³
09 01 05*	Bleach and bleach fixer solutions ³
09 01 07	Photographic film and paper containing silver or silver compounds ³
09 01 08	Photographic film and paper free of silver or silver compounds ³
18	WASTES FROM HUMAN OR ANIMAL HEALTHCARE AND/OR RELATED RESEARCH (EXCEPT KITCHEN AND RESTAURANT WASTES NOT ARISING FROM IMMEDIATE HEALTH CARE)
18 01	Wastes from natal care, diagnosis, treatment or prevention of disease in humans
18 01 01	Sharps (except 18 01 03)
18 01 02	Body parts and organs including blood bags and blood preserves (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

⁶ This is limited to wastes of this type arising from medical practices or associated research activities.



EWC Code	Description
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)

4.4 Permitted Hours of Operation

The WTS's hours of operation will be in accordance with planning permission as follows:

- 6am to 6pm Monday to Sunday excluding Christmas Day and New Years Day.

4.5 Site Infrastructure and Equipment

4.5.1 Site Identification Board

A site identification board which is easily readable from outside the entrance during hours of daylight will be provided by the main site entrance.

The identification board will be 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 upon with the EA.

The board will display the following information:

- Site name and address;
- Permit holder;
- Permit number;
- Emergency contact name and telephone number;
- EA national telephone numbers; and
- Days and hours site is open to receive waste.

4.5.2 Plant and Equipment

The following items of plant and equipment will be held on site. This is not a fixed list of plant:

-

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 will be maintained in accordance with manufacturer's recommendations.



4.5.3 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.

The proposed WTS will accept up to 95,000 tpa of predominantly non-hazardous mixed waste with a small proportion of that consisting of clinical waste (approximately 12,000 tpa), including nappies and sharps.

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 Otterpool WTS will be managed by CRL who will ensure that the waste has been properly assessed and classified in line with WM3⁷. 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.

⁷ [Waste classification technical guidance - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/waste-classification-technical-guidance)



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.

5.2 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).

All vehicles bringing waste material to the site will report to the weighbridge or site office following which the load will be left in the lorry trailer outside the WTS building ready to be taken in by site operators for storage. All waste will undergo visual inspection during deposition within the WTS building to confirm its description and composition against the relevant accompanying documentation.

Waste will only be accepted, and stored at the site if the description on the accompanying documentation is in accordance with the EP and that onsite inspection confirms the waste is consistent with the description provided.

Should the wastes be found not to conform during the visual inspection, then the details will be recorded, and the waste will be removed to the designated quarantine area as appropriate.

The 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.

Waste will not be accepted unless the site is adequately resources to receive the waste.

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

A record will be kept in the site diary of all rejected wastes. In the event of non-conformance, the waste producer and the EA will be notified.



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 for a maximum of 36 hours, prior to export from site to a suitably permitted alternative facility.

The maximum storage volume of waste in the area will be 50% of the largest waste stockpile on site. 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.

5.4 Waste Tracking

The quantity of waste accepted and despatched from the facility will be measured via the weighbridge.

A register of the quantities and characteristics of waste accepted at the site will be maintained on a computerised database. The database will include the following information:

- Pre-acceptance;
- Acceptance;
- Non-conformance or rejection;
- Storage;
- Repackaging;
- Treatment; and
- Removal off site.

The system will also operate as the waste inventory and stock control system, including the following information as a minimum:

- The date the waste arrived on site;
- The original producer's details (or unique identifier);
- A unique reference number;
- Waste pre-acceptance and acceptance information;
- The package type and size;
- The intended treatment or disposal route;
- The nature and quantity of wastes held on site;
- Where the waste is physically located on site;
- Where the waste is in the designated recovery process;



- The staff who have taken any decisions about accepting or rejecting waste streams and who have decided on recovery or disposal options;
- Details that link waste to relevant transfer notes; and
- Details of any non-conformances and rejections, including consignment notes for waste rejected because it is hazardous.

The system will be able to report on the following for each LoW code:

- The total quantity of waste present on site at any one time;
- A breakdown of the waste quantities stored pending on-site treatment or awaiting onward transfer;
- Where a batch of waste is located based on a site plan;
- The quantity of waste on site compared with the limits in the management system and permit; and
- The length of time the waste has been on site compared with the limits in the management system and permit.

Waste acceptance records will be kept for a minimum of 2 years once the waste has been treated and removed from site. A back-up copy will also be kept offsite and will be readily available in an emergency.

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, or containers inside the WTS building. The building 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 maximum storage capacity for the site will be 1,500tonnes. 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 for a maximum of 5 days. 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	Max Length (m)	Max Width (m)	Max Height (m)	Max Volume (m ³)	Max Storage Time
Comingled Bay	10.5	12	3	378	5 days
Bulky Bay	10.5	8.5	3	267.75	5 days
Paper and Cardboard Bay	10.5	8.5	3	267.75	5 days
Residual Bay	11.5	10.5	3	362.25	5 days
Street Sweepings Bay	10.5	9.5	3	299.25	5 days
Garden Waste Bay	10.5	8.5	3	299.25	5 days
Clinical Waste	Container				5 days
Bulky POPs	Container				5 days
Food Waste	Container				5 days

7.0 Waste Treatment

The site will operate as a WTS for the acceptance, storage and bulking up of waste prior to export to an alternative suitably permitted facility for further recovery / disposal. There will be no waste treatment undertaken on site, apart from manual sorting, and separation, storage and bulking prior to onward transfer.

The full process description is detailed within Section 4.1.

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;
- The hourly processing capability of waste treatment equipment; and
- A summary of operating and maintenance procedures.

7.1 Waste Treatment Outputs, Including Fines

There will be no waste treatment undertaken on site, apart from manual separation and sorting of waste. Outputs will be classified following WM3.

8.0 Emissions Control

8.1 Enclosure within Buildings

All waste acceptance and storage will take place within the WTS building as illustrated on Drawing 02. Undertaking all activities within the building will prevent and minimise emissions of pollution including noise, dust and odour.

The building benefits from roller shutter doors which will be shut unless accepting or removing waste to help maintain containment during vehicle ingress/egress.

The integrity of the building will be assessed monthly to look for signs of damage that could result in fugitive emissions.

8.2 Point Source Emissions to Air

The site will be operated so that there are no point source emissions to air.

8.3 Fugitive Emissions to Air

8.3.1 Odour

The site will be operated so as to minimise odour emissions from the site, in line with CRL's OMP. Measures that will be taken at the site include:

- Clinical waste types will be kept segregated from the other wastes streams at all times;
- All wastes will be accepted, and stored within a dedicated WTS building. The WTS building will be fully enclosed, to ensure ingress of odour from the building is minimised;
- Fast-acting roller shutter doors will be installed on the WTS building, and kept closed during tipping and unloading of wastes;
- Strict WAP will be adhered to, to ensure only permitted wastes are accepted on site;
- All waste storage containers and bays within the WTS building will be clearly labelled to ensure the segregation of waste;
- Odour masking sprays will be fitted within the WTS building;
- Potentially odorous wastes will be stored for minimal periods of time, with clinical waste stored for a maximum of 5 days.

If significant odours are detected, investigations will be undertaken to determine the cause and appropriate remedial action taken.



8.3.2 Dust

The site will be operated so as to minimise dust emissions from the site, in line with CRL's DMP. Measures that will be taken at the site include:

- All waste will be accepted to and stored within a fully enclosed WTS building;
- The WTS building will have fast action roller shutter doors that will be closed during tipping and waste handling;
- Speed limits will be implemented for vehicles using the site;
- Traffic calming measures will be implemented to enforce speed limits & reduce emissions of dust;
- Site access roads and operational areas will be 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 shall be sheeted to minimise emissions of dust; and
- Drop heights will be minimised to prevent emissions of dust.

If significant odours are detected, investigations will be undertaken to determine the cause and appropriate remedial action taken.

8.3.3 Noise

The noise risk from the proposed Otterpool WTS has been assessed in the NIAMP which was carried out in accordance with the guidance contained in British Standard 4142:2014.

The following procedures will be in place at the site, as detailed in the NIAMP to ensure that noise from the acceptance and handling of waste on site is minimised:

- All waste will be accepted and stored within an enclosed WTS building;
- Site operations will be restricted to hours specified in the planning consent;
- All plant will be switched off when not in use;
- Plant will be selected & operated to minimise noise. All site plant and machinery will be operated and maintained in accordance with manufacturer's specifications;
- If horns or alarms on site plant or infrastructure, or delivery vehicles are deemed to cause unacceptably high levels of noise, alternative technologies will be explored and implemented;
- Speed limits will be implemented for vehicles using the site;
- Traffic calming measures will be implemented to enforce speed limits; and
- Site access roads and operational areas will be maintained and repaired to minimise emissions of noise due to uneven and poor surfacing.

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.

8.3.4 Litter

The following management techniques will be employed at the site, to ensure that the risk of generation of litter from wastes is minimised:



- Strict WAP will ensure that only authorised wastes are accepted;
- The site will benefit from good housekeeping and all areas of the site will be cleaned on a daily basis;
- All site vehicles leaving operational areas will be inspected to ensure that they are clear of loose waste;
- All wastes will be accepted to and stored within an enclosed WTS building.

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

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

8.3.5 Mud and Debris

The site's access road is the A20 Ashford Road. All access roads and operational areas of the site will be tarmacked and as such the risk of mud track out from traffic and plant machinery movements will be low.

The following management techniques will be employed at the site, to ensure that the risk of mud track out is minimised:

- Areas of hardstanding and impermeable surfacing will be maintained free of significant quantities of mud and debris;
- All vehicles will be covered when loads are entering and exiting the facility;
- Roads will be swept and cleaned whenever necessary; and
- In the event that mud, debris or waste arising from the site is deposited outside the site, the affected area will be cleaned, and traffic will be isolated from sources of mud and debris within the site.

Daily visual inspection of the site by site management will identify any problem with mud which will be cleaned up as soon as possible. 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.

The Site Manager will be responsible for ensuring that the site is monitored daily, and that investigations and remedial actions are recorded in the site diary in accordance with the management system.

8.4 Point Source Emissions to Water (Including Sewer)

There will be no point source emissions to surface water or groundwater.

The site will benefit from a sealed drainage system, with surface water discharged through the attenuation pond with penstock controlled discharge to sewer.



8.5 Fugitive Emissions to Land and Water

The site will be operated to prevent fugitive emissions to land and water.

8.5.1 Site Drainage

All areas of the site utilised for waste storage will have the benefit of impermeable surfacing, and a sealed drainage system.

The building benefits from impermeable surfacing and small amounts of runoff generated from periodic wash downs will be contained within the building and directed towards public foul sewer.

Site surfacing will be maintained as required to ensure surfacing is fit for purpose. The surface will be maintained such that the working surface will;

- Remain even;
- Not be subject to settlement of differential settlement;
- Not be subject to rutting by vehicles even when wet;
- Have sufficient durability to allow cleaning, for example, by scraping; and
- Remain free of standing water.

All operational areas, quarantine and fuel storage areas will be inspected to ensure the integrity and fitness for purpose of their construction is maintained at all times.

8.5.2 Containment Bunding

Chemicals or fuel used on site will be stored in an appropriate tank that benefits from a bund with the capacity to store 110% of the tank capacity. The bunds will be:

- Impermeable and resistant to the stored materials;
- Have no outlet;
- 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 pipework routed within bunded areas with no penetration of contained surface;
- Have tanker connection points within the bund; and
- Be subject to regular visual inspection.

8.6 Pests

Strict WAP will be implemented to ensure that only authorised wastes are accepted. In the event that non-conforming wastes are delivered to site, they will be isolated and removed from site at the earliest opportunity.

All waste will be stored within the fully enclosed WTS building, minimising the risk of pests.

Timeframes for storage of wastes will be kept as low as practically possible, and all waste is stored for a maximum of 5 days.

In the event that birds, vermin & insects are identified at the site, a specialist pest control contractor will be employed to undertake remedial measures.



9.0 Emissions Monitoring and Limits

There will be no point source emissions to air, water, land or sewer and therefore no emissions limits or formal monitoring requirements are proposed within the EP.

10.0 Waste Minimisation, Recovery and Disposal

The site will implement a residues management plan that:

- Minimises the generation of residues, (solid waste arising from the treatment of waste);
- Optimises the reuse, regeneration, recycling or energy recovery of residues, including packaging; and
- Makes sure residues are properly disposed of where recovery is technically or economically impractical.

The key principles of the residues management plan are:

- The site will implement waste pre-acceptance and acceptance procedures with a strict specification for material to be accepted on site;
- A detailed assessment identifying the best environmental options for waste disposal will be conducted where the disposal of waste is required; and
- The options for recovering and disposing of waste produced on site will be reviewed on an annual basis to ensure the best environmental options are still being used and the recovery of waste is promoted where technically and economically viable.

11.0 Information

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

Records will be maintained for at least six years, however in the case of off-site environmental effects, and matters which affect the condition of land and groundwater, the records are to be kept until EP surrender. Duty of Care records will be kept for a minimum of two years.

11.1 Reporting and Notifications

11.1.1 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 required technical competence.

11.1.2 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 one month of the end of the quarter unless otherwise required by the permit conditions.

11.1.3 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.

11.1.4 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.

11.1.5 Adverse Effects

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

- Any malfunction, breakdown or failure of equipment or techniques;
- Any accident;
- Fugitive emissions which have caused, is causing or may cause significant pollution; and
- Any significant adverse environmental and health effect.





