

## Best Available Techniques

Requirement	Measures in place
<b>1.1. Measures that apply to different types of facilities</b>	N/A 1.1 refers to transfer station and treatment activities. Navigator Terminals North Tees is an Upper Tier COMAH site.
<b>1.2. Implementing appropriate measures at new and existing facilities.</b>	There is a large capital investment circa 3 million pounds to the infrastructure. These changes will be carried out prior to the operation going live. All other examples are met with current management systems and undergo periodic reviews
<b>2. General management appropriate measures</b>	
<b>2.1 Management System.</b>	
1. You must have and follow an up-to-date, written management system that incorporates the following environmental performance features: You have: management commitment, including from senior managers. an environmental policy that is approved by senior managers and includes the continuous improvement of the facility's environmental performance	All are captured in the Navigator Management System (NMS).  NUK-POL-SHE-0001 Safety Health, Environment and Quality Policy Statement 45001 & 14001 Certificates in document pack.
You implement your environmental performance procedures, paying particular attention to:  staff structure and relevant responsibilities. staff recruitment, training, awareness and competence communication (for example, of performance measures and targets) employee involvement documentation effective process control maintenance programmes managing change	Navigator Terminals have department structures and job descriptions with responsibilities. NMS is linked to our training system ARK. Monthly reports are sent out showing targets and performance. We have employee involvement in UK and Terminal SHEQ meetings. Managing change is documented on NMS and is recorded on Eventis, Navigators management tool. Emergency preparedness and response documents are held on NMS. Maintenance program is on PEMAC, a computerised maintenance management system.

<p>emergency preparedness and response making sure you comply with environmental legislation</p>	
<p>You check environmental performance and take corrective or preventative action, paying particular attention to:</p> <p>monitoring and measurement learning from incidents, near misses and mistakes, including those of other organisations records maintenance independent (where practicable) internal or external auditing of the management system to confirm it has been properly implemented and maintained</p>	<p>Navigator Terminals North Tees has W2 already in place for the environmental permit for which we record findings and report to EA 6 monthly and annually. Navigator Terminals share events with other terminals and contracting companies, this is also reciprocated. Maintenance records are held on PEMAC. We have an internal audit team and also have BSI audits for 9001, 14001 &amp; 45001. Customer audits are also carried out. Audits are recorded on Eventis, any actions are recorded electronically, and all members of staff have access to Eventis.</p>
<p>Senior managers review the management system to check it is still suitable, adequate and effective.</p>	<p>NMS requirements is a periodical review of all documents by department head or in the case of a UK document usually by Senior Management Group members.</p>
<p>You review the development of cleaner technologies and their applicability to site operations.</p>	<p>When replacing pumps etc we use the items that are most energy efficient.</p>
<p>When designing new plant, you make sure you assess the environmental impacts from the plant's operating life and eventual decommissioning.</p>	<p>Any new build involves an ERA.</p>
<p>You consider the risks a changing climate poses to your operations. You have appropriate plans in place to assess and manage future risks.</p>	<p>We have a COMAH Flood Risk Assessment and are assessing the risks for 2030, 2070 and 2100 as per the latest EA guidance.</p>
<p>You compare your site's performance against relevant sector guidance and standards on a regular basis, known as sectoral benchmarking.</p>	<p>For the past 3 years we have been carrying out an annual Safety Score Card which is benchmarked against those in our industry and those outside. For the third year in a row we are above industry standard.</p>
<p>You have and maintain the following documentation:</p> <p>inventory of emissions to air and water.</p>	<p>Yes, 6 monthly and annual reporting.</p>

<p>residues management plan. accident management plan. site infrastructure plan. site condition report.</p> <p>odour management plan, if required. noise and vibration management plan, if required. dust management plan, if required. pest management plan, if required. fire prevention plan, if required.</p>	<p>Yes, bore hole sampling. Yes, in our monthly and annual terminal reports. Yes, annual maintenance plans. Yes, Safety Observation rounds and other reports N/A</p> <p>Noise monitoring is carried out in areas that require it, i.e. pump bays and jetty crane. N/A</p> <p>Contract with rent-a-kill and bird control with Contego. Controlled hot work and on site 3<sup>rd</sup> party emergency response.</p>
<p>climate change risk assessment, if required.</p>	<p>Current COMAH Flood Risk Assessment held.</p>
<p><b>2.2 Staff Competence</b></p>	
<p>1. Your site must be operated at all times by an adequate number of staff with appropriate qualifications and competence.</p>	<p>We have recently had an Entec report carried out which didn't highlight any staffing issues. All staff have the appropriate levels of training and competence. Training and Competence forms part of a CA intervention visit or audit topic for verification.</p>
<p>2. The design, installation and maintenance of infrastructure, plant and equipment must be carried out by competent people.</p>	<p>Navigator terminals use 3<sup>rd</sup> party contractors for design and installation competencies are checked within the approved contractor forms and again in the Risk Assessment and Method Statement supplied prior to any work commencing.</p>
<p>3. You must have appropriately qualified managers for your waste activity who are members of a government-approved technical competency scheme.</p>	<p>N/A not required under this permit. However Navigator Terminals have fully trained operators to handle liquid products.</p>
<p>4. The person carrying out the technical appraisal of a waste's suitability for receipt at pre acceptance must have the minimum of a Higher National Certificate (HNC) in chemistry (or equivalent qualification). For the following wastes, technical appraisals must be carried out by a person who has had enough training to determine the suitability of the waste for the site:</p>	<p>N/A product has already been categorised before arriving at the terminal.</p> <p>N/A liquid waste only</p>

<p>asbestos contaminated clothing and rags 'articles', for example waste electronic equipment or batteries contaminated wood solid non-hazardous waste other than 'mirror entries' (where waste may be allocated to a hazardous entry or to a non-hazardous entry according to the European List of Waste)</p>	
<p>5. If you need to sample, check (other than visually), or test a hazardous waste when you accept it, acceptance must be supervised by someone with the minimum of an HNC in chemistry (or equivalent qualification). At sites where the waste needs only a visual check, the person who receives the waste must have had enough training to be able to identify and manage any non-conformances in the load received.</p>	<p>N/A any sampling will be carried out on the customers request using a 3<sup>rd</sup> party contractor.</p>
<p>6. You must make sure that any required sample is representative of the waste and has been taken by someone technically competent to do so.</p>	<p>N/A Samples are taken on the customers request by a 3<sup>rd</sup> party contractor.</p>
<p>7. Any required analysis must be done by someone with the minimum of an HNC in chemistry (or equivalent qualification).</p>	<p>N/A Samples are taken on the customers request by a 3<sup>rd</sup> party contractor. Analysis is carried out by the same 3<sup>rd</sup> party contractor.</p>
<p>8. Non-supervisory staff must be reliable and technically skilled. Their skills may be based on experience and relevant training.</p>	<p>All Navigator Terminals staff are suitably trained.</p>
<p><b>2.3 Accident Management Plan</b></p>	
<p>1. As part of your written management system you must have a plan for dealing with</p>	<p>The following all refer NTN-ERP-PROC-0001 North Tees Internal Emergency Response Plan</p>

<p>any incidents or accidents that could result in pollution.</p>	<p>NTN-ERP-PROC-0002 North Tees Terminal Waterfront and River Spill Response Plan NTN-ERP-PROC-0003 Spillage to river emergency spill pre-plan.</p>
<p>2. The accident management plan must identify and assess the risks the facility poses to human health and the environment.</p>	<p>This is part of NTN-ERP-PROC-0001 North Tees Internal Emergency Response Plan which identifies those people who would be part of the emergency response plan. The PEAR acronym is used People, Environment, Assets &amp; Reputation.</p>
<p>3. Particular areas to consider may include:</p> <p>waste types vessels overflowing failure of plant and equipment (for example over-pressure of vessels and pipework, blocked drains) failure of containment (for example, bund failure, or drainage sumps overflowing) failure to contain firefighting water making the wrong connections in drains or other systems preventing incompatible substances coming into contact with each other unwanted reactions and runaway reactions checking the composition of an effluent before emission vandalism and arson extreme weather conditions, such as flooding or very high winds</p>	<p>All covered under NTN-ERP-PROC-0001 North Tees Internal Emergency Response Plan.</p>
<p>4. You must assess the risk of accidents and their consequences. Risk is the combination of the likelihood that a hazard will occur, and the severity of the impact resulting from that hazard. Having identified the hazards, you can assess the risks by addressing 6 questions:</p> <p>how likely is it that the accident will happen?</p>	<p>These are covered in the site ERA.</p>

<p>what may be emitted and how much?  where will the emission go – what are the pathways and receptors?  what are the consequences?  what is the overall significance of the risk?  what can you do to prevent or reduce the risk?</p>	
<p>5. In particular, you must identify any fire risks, for example from:  arson or vandalism.  self-combustion, for example due to chemical oxidation plant or equipment failure and electrical faults.  naked lights and discarded smoking materials.  hot works (for example welding or cutting), industrial heaters and hot exhausts.  reactions between incompatible materials  neighbouring site activities</p> <p>sparks from loading buckets  hot loads deposited at the site</p>	<p>As an upper tier COMAH site fire risks are reduced to a minimum.</p> <p>Security patrols and CCTV are in operation.  N/A we currently don't handle any self-combusting products.  Maintenance regime is in place.</p> <p>No naked lights or smoking on site, only allowed in designated smoking area.  All hot works are covered in the Permit to Work system. This covers vehicles, generators etc.</p> <p>Any reactive materials are identified using the terminals product acceptance routine.  Neighbouring sites have alarms which we respond to. They use the same on-site 3rd party emergency response provider.</p> <p>N/A  N/A</p>
<p>6. The depth and type of accident risk assessment you do will depend on the characteristics of the plant and its location. The main factors to take into account are the:</p> <p>scale and nature of the accident hazard presented by the plant and its activities  risks to areas of population and the environment (the receptors)  nature of the plant and complexity of the activities, and how difficult it is to decide and justify adequate risk control techniques</p>	<p>The site, under COMAH has to produce a 5 yearly Safety Report and ERA with is submitted to the Competent Authorities for review.</p>
<p>7. Through your accident management plan, you must</p>	<p>All roles and responsibilities are clearly identified within NTN-ERP-PROC-0001 North Tees Internal</p>

<p>also identify the roles and responsibilities of the staff involved in managing accidents. You must give them clear guidance on how to manage each accident scenario, for example, whether to use containment or dispersion to extinguish fires, or let them burn.</p>	<p>Emergency Response Plan. Scenarios are detailed and discussions are made within the Emergency Control Centre, in conjunction with, the Chief Fire Officer and Competent Authorities with reference to burn policy.</p>
<p>8. You must appoint one facility employee as an emergency co-ordinator who will take lead responsibility for implementing the plan. You must train your employees so they can perform their duties effectively and safely and know how to respond to an emergency.</p>	<p>Detailed within NTN-ERP-PROC-0001 North Tees Internal Emergency Response Plan are roles and responsibilities during an emergency. Employees receive Site Main Controller or Site Incident Controller training.</p>
<p>9. You must also:</p> <p>establish how you will communicate with relevant authorities, emergency services and neighbours (as appropriate) both before, during and after an accident.</p> <p>have appropriate emergency procedures, including for safe plant shutdown and site evacuation.</p> <p>have post-accident procedures that include making an assessment of the harm that may have been caused by an accident and the remediation actions you will take.</p> <p>test the plan by carrying out emergency drills and exercises</p>	<p>A communication plan is within the NTN-ERP-PROC-0001 North Tees Internal Emergency Response Plan.</p> <p>This is detailed in the NTN-ERP-PROC-0001 North Tees Internal Emergency Response Plan and operating procedures.</p> <p>This is detailed in the NTN-ERP-PROC-0001 North Tees Internal Emergency Response Plan and operating procedures.</p> <p>Exercises are carried out over the course of the year, with a 3 yearly requirement under COMAH for an exercise involving emergency services.</p>
<p><b>2.4 Accident Prevention measures</b></p>	
<p>1. You must keep apart incompatible or segregated wastes and substances by their hazardous properties.</p>	<p>This product will have a dedicated system. See document Navi 01.</p>
<p>2. You must segregate incompatible waste types into bays or store them in</p>	<p>This product will have a dedicated system. See document Navi 01.</p>

<p>dedicated buildings. The minimum requirement is to use a kerbed perimeter and separate drainage collection. You must also have measures in place to prevent containers falling over into other storage areas.</p>	
<p>3. You must make sure you contain the following (where appropriate) and route to the effluent system (where necessary):</p> <p>process waters site drainage waters emergency firefighting water chemically contaminated waters spillages of chemicals</p>	<p>The site has an effluent system which covers this requirement.</p>
<p>4. You must be able to contain surges and storm water flows. You must provide enough buffer storage capacity to make sure you can achieve this. You can define this capacity using a risk-based approach, for example, by taking into account the:</p> <p>nature of the pollutants effects of downstream waste water treatment sensitivity of the receiving environment</p>	<p>The effluent system used is able to contain surges and storm water flows. The system has a series of lagoons and a separate buffer tank of approx. 18,000m<sup>3</sup>.</p>
<p>5. You can only discharge waste water from this buffer storage after you have taken appropriate measures, for example, to control, treat or reuse the water.</p>	<p>All wastewater is treated and tested by 3<sup>rd</sup> party owner of the effluent treatment plant.</p>
<p>6. You must have spill contingency procedures to minimise the risk of an accidental emission of raw materials, products and waste materials, and to prevent their entry into water.</p>	<p>NTN-ERP-PROC-0002 North Tees Terminal Waterfront and River Spill Response Plan refers. The effluent system can be redirected to the buffer tank preventing release to water.</p>



<p>7. Your emergency firefighting water collection system must take account of additional firefighting water flows or firefighting foams. You may need emergency storage lagoons to prevent contaminated firefighting water reaching a receiving water body.</p>	<p>Fire pre plans take into account the amount of water required. Navigator Terminals are installing 36" pipe links between bunds to allow fire water to be moved. The Effluent system has a series of lagoons and a separate buffer tank of approx. 18,000m<sup>3</sup>.</p>
<p>8. You must consider and, if appropriate, plan for the possibility that you need to contain or abate accidental emissions from:</p> <p>overflows vents safety relief valves bursting discs</p>	<p>All tanks sit within suitable bunds. All bunds have penstock valves, which are locked closed.</p>
<p>9. You must have security measures (and staff) in place to prevent:</p> <p>entry by intruders damage to equipment theft fly-tipping arson</p>	<p>The site is secure with a manned security gate and perimeter fence. There is adequate lighting on site. There is CCTV which is controlled and monitored by the control room, security patrols drive the site with some foot patrols and signage on the fence line and at the entrance.</p>
<p>10. Facilities must use an appropriate combination of the following measures:</p> <p>security guards total enclosure (usually with fences) controlled entry points adequate lighting warning signs 24-hour surveillance, such as CCTV</p>	<p>The site is secure with a manned security gate and perimeter fence. There is adequate lighting on site. There is CCTV which is controlled and monitored by the control room, security patrols drive the site with some foot patrols and signage on the fence line and at the entrance.</p>
<p>11. There are 3 fire prevention objectives. You must:</p> <p>minimise the likelihood of a fire happening</p>	<p>The site removes all combustible materials and any work on the site is carried out under a safe system of work.</p>

aim for a fire to be extinguished within 4 hours minimise the spread of fire within the site and to neighbouring sites	Fire prevention objectives are covered with the series of fire pre plans, covering time to extinguish, amount of water/foam used.
12. You must have appropriate systems for fire prevention, detection and suppression or extinction.	There is a 3 <sup>rd</sup> party emergency responder based on the site with enough industrial equipment and firefighting foam to extinguish our worst case.
13. You must have suitable procedures and provisions (such as fire resistant stores, automatic alarms and sprinklers) to store certain types of hazardous waste.	N/A
14. Your facility must have enough water supplies to extinguish fires. You must have an alternative type of fire protection system if you store or treat any water-reactive waste, for example dry powder extinguishers.	There is a 3 <sup>rd</sup> party emergency responder based on the site with enough industrial equipment and firefighting foam to extinguish our worst case.
15. You must isolate drainage systems from flammable waste storage areas to prevent fire spreading along the drainage system by solvents or other flammable hydrocarbons.	All tanks sit within suitable bunds. All bunds have penstock valves, which are locked closed.
16. You must regularly inspect and clean your site to prevent the build-up of loose combustible material (including waste and dust), particularly around treatment plant, equipment and other potential sources of ignition.	The site removes all combustible materials and any work on the site is carried out under a safe system of work.
17. You should share and communicate accident management and fire prevention plans with your local fire and rescue service.	Fire plans are produced in conjunction with the 3 <sup>rd</sup> party emergency responder who have shared copies.
18. You must assess areas of the site where explosive atmospheres could occur and, where appropriate, classify them into hazardous zones in accordance with the Dangerous Substances and Explosive Atmospheres	The site has Hazardous Area Drawings and fully complies with DSEAR. All equipment used in these areas are ATEX rated.

<p>Regulations. Plant and equipment used in these zones must be ATEX compliant.</p>	
<p>19. You must maintain plant control in an emergency – use one or a combination of the following measures: Alarms, process trips and interlocks, automatic systems based on microprocessor control and valve control, tank level readings such as ultrasonic gauges, high level warnings, process interlocks and process parameters</p>	<p>The site is fitted with ESD's which when pushed stops site operations putting all equipment into a safe state. There are site alarms, where required systems are fitted with process trips and interlocks. Tanks are fitted with radar gauging.</p>
<p>20. You must:</p> <p>make sure all the measurement and control devices you would need in an emergency are easy to access and will operate in an emergency.</p> <p>maintain the plant so it is in a good state through a preventive maintenance programme and a control and testing programme.</p> <p>use techniques such as suitable barriers to prevent moving vehicles damaging equipment</p> <p>have procedures in place to avoid incidents due to poor communication between operating staff during shift changes and after maintenance or other engineering work</p>	<p>Any emergency equipment is easily available and is signed as such. All equipment such as alarms etc are tested periodically</p> <p>There is a detailed preventative maintenance program in place.</p> <p>Tanks are within bunds, pipelines are protected within pipe tracks. Site speed limit in operation.</p> <p>Shift handovers are in place. Navigator terminals use equipment handover documentation when carrying out work on equipment.</p>
<p>21. You must:</p> <p>keep an up-to-date record of all accidents, incidents, near misses, changes to procedures, abnormal events, and the findings of maintenance inspections.</p>	<p>Recorded on Eventis</p>

<p>investigate accidents, incidents, near misses and abnormal events and record the steps you take to stop them reoccurring.</p> <p>maintain an inventory of substances, which are present (or likely to be) and which could have environmental consequences if they escape – many apparently innocuous substances can damage the environment if they escape.</p> <p>have procedures for checking raw materials and wastes to make sure they are compatible with other substances they may accidentally come into contact with</p>	<p>All incidents are investigated and recorded on eventis.</p> <p>Full site inventory is recorded on QINO, inventory control system. The site is subject to hazardous consent for a maximum amount.</p> <p>Navigator Terminals operates a product assessment routine for every product coming to site. Product Information Cards and COSHH are produced for every product on site.</p>
<p><b>2.5 Contingency Plan and Procedures</b></p>	
<p>1. You must have and implement a contingency plan, which makes sure you:</p> <p>comply with all your permit conditions and operating procedures during maintenance or shutdown at your site, or elsewhere.</p> <p>do not exceed storage limits in your permit and you continue to apply appropriate measures for storing and handling waste.</p> <p>stop accepting waste unless you have a clearly defined method of recovery or disposal and enough permitted storage capacity.</p>	<p>45001, 14001 audits and planned intervention visits are carried out were permit conditions and operating/engineering procedures are examined.</p> <p>Hazardous consent is in place and is part of the permit review with the CA</p> <p>Dedicated system for this waste.</p>
<p>2. You should have contingency procedures to make sure that, as far as possible, you know in advance about any planned shutdowns at waste management facilities where you send waste.</p>	<p>Contingency plans are part of the Customer contract.</p>
<p>3. You must make your customers aware of your contingency plan, and of the circumstances in which you</p>	<p>As above</p>

would stop accepting waste from them.	
4. You should consider whether the sites or companies you rely on in your contingency plan:  can take the waste at short notice. are authorised to do so in the quantities and types likely to be needed – in addition to carrying out their existing activities.	N/A customer owns treatment plant
5. You should not discount alternative disposal or recovery options on the basis of extra cost or geographical distance if doing so means you could exceed your permitted storage limits, or compromise your storage procedures.	N/A customer owns treatment plant
6. You must not include unauthorised capacity in your contingency plan. If your contingency plan includes using temporary storage for additional waste on your site, you must make sure your site is authorised for this storage and you have the appropriate infrastructure in place.	Dedicated system with nominated tanks
Questions 7, 8 & 9	N/A refers to treatment plants.
<b>2.6 Plant Decommissioning</b>	
1. You must consider how you will decommission the plant at the design stage, and plan how you will minimise risks during decommissioning.	N/A Existing plant will be used
2. For existing plants where potential risks are identified, you must have a programme of design improvements. These design improvements need to make sure you:  avoid using underground tanks and pipework – if it is not economically possible to	Site design improvement are part of the 5 year COMAH safety report submission  N/A no under ground tanks

<p>replace them, you must protect them by secondary containment or a suitable monitoring programme.  drain and clean out vessels and pipework before dismantling.  use insulation which you can dismantle easily without dust or hazard.  use recyclable materials, taking into account operational or other environmental objectives.</p>	<p>Before any dismantling plant is washed and flushed.</p> <p>N/A heated tanks is not required.</p> <p>N/A</p>
<p>3. You must have and maintain a decommissioning plan to demonstrate that:  plant will be decommissioned without causing pollution.  the site will be returned to a satisfactory condition.</p>	<p>N/A. Sections of plant can be replaced i.e. pumps, pipelines and tanks can all be isolated and upgraded/replaced.</p>
<p>4. Your decommissioning plan should include details on:</p> <p>whether you will remove or flush out pipelines and vessels (where appropriate) and how you will empty them of any potentially harmful contents  site plans showing the location of all underground pipes and vessels  the method and resources needed to clear any on-site lagoons  the method for closing any on-site landfills  how asbestos or other potentially harmful materials will be removed, unless we have agreed it is reasonable to leave such liabilities to future owners  methods for dismantling buildings and other structures, and for protecting surface water and groundwater during</p>	<p>All tank and pipeline washings are removed from site using a 3<sup>rd</sup> party waste contractor and disposal is via an approved waste site.</p> <p>N/A</p> <p>N/A</p> <p>N/A</p> <p>N/A</p>

<p>construction or demolition at your site any soil testing needed to check for pollution caused by site activities, and information on any remediation needed to return the site to a satisfactory state when you stop activities, as defined by the initial site condition report the measures proposed, once activities have definitively stopped, to avoid any pollution risk and to return the site of operation to a satisfactory state (including, where appropriate, measures relating to the design and construction of the plant) the clearing of deposited residues, waste and any contamination resulting from the waste treatment activities</p> <p>5. You should make sure that equipment taken out of use is decontaminated and removed from the site.</p>	<p>N/A</p> <p>N/A</p> <p>N/A</p>
<p><b>3. Waste pre-acceptance, acceptance and tracking appropriate measures</b></p>	
<p><b>3.1 Waste Pre-Acceptance</b></p>	
<p>1. You must implement waste pre-acceptance procedures so that you know enough about a waste (including its composition) before it arrives at your facility. You need to do this to assess and confirm the waste is technically and legally suitable for your facility. Your procedures must follow a risk-based approach, considering:</p> <p>the source and nature of the waste its hazardous properties potential risks to process safety, occupational safety and the environment (for example,</p>	<p>NUK-PRO-SHEMS-0017A PEAR: Product Enquiry Assessment Record refers. This process has terminal involvement from all departments. This management of change is used across our industry.</p>

<p>from odour and other emissions) knowledge about the previous waste holder</p>	
<p>2. When you receive a customer query, and before the waste arrives at your facility, you must obtain the following in writing or in an electronic form:</p> <p>details of the waste producer including their organisation name, address and contact details the source of the waste (the producer's business and the specific process that has created the waste) where the holder of the waste is not the producer, details of the waste holder including their organisation name, address and contact details information on the nature and variability of the waste production process and the waste</p> <p>You must also obtain (in writing or electronic form) details about the waste including:</p> <p>a description the List of Waste code (European Waste Classification (EWC) code) its physical form its composition (based on safety data sheets, where appropriate, or representative samples and robust laboratory analysis) any hazardous properties any persistent organic pollutants (POPs) present</p>	<p>Already received and will be detailed in the Service Level Agreement.</p> <p>All received SDS assessed.</p>



<p>the potential for self-heating, self-reactivity or reactivity to moisture or air any odour its age, that is when it first became waste the type of packaging an estimate of the quantity you expect to receive in each load and in a year You must also obtain confirmation that the waste does not contain a radioactive source. If there is a risk of radioactive contamination you must obtain confirmation that the waste is not radioactive, unless your facility is permitted to accept such waste.</p>	
<p>3. You must consider whether specific wastes, from among those you are permitted to receive, have properties that can pose unacceptable risks to the site or process, for example due to:</p> <p>a risk of explosion (for example, if ammunition or aerosol canisters are present, or mixing processes that could lead to explosion) corrosion caused by strong acids a risk of uncontrolled reactions (for example, if peroxides or strong oxidants are present, or polymerising components such as certain isocyanates) a risk of the evolution of gases (for example if cyanides, sulphides or dissolved gas are present) You should establish a list of such wastes.</p>	<p>Waste mixture is 99% water 1% crude oil</p> <p>N/A no acids on site</p> <p>N/A</p> <p>N/A</p> <p>N/A</p>
<p>4. You can verify the pre-acceptance information by contacting or visiting the producer. Dealing with staff directly involved in waste</p>	<p>SDS received detailing waste specification.</p>

<p>production will help to fully characterise a waste.</p>	
<p>5. You must obtain and analyse a representative sample of a waste if:</p> <p>the chemical composition or variability of the waste is unclear from the information supplied by the customer. there are doubts about whether the sample analysed is representative of the waste. you will treat the waste at your facility (this allows you to carry out tests to determine if the planned treatment will be safe and effective). Where you rely on a customer sample you must record that you have done this and the reason why the customer sample is acceptable.</p>	<p>N/A SDS available</p>
<p>6. You may not need a representative sample where, for example, the waste is:</p> <p>asbestos  a pure product chemical or aerosol where the chemical composition and hazardous properties are available in a REACH compliant safety data sheet  packaged cosmetics and pharmaceuticals  contaminated clothing, packaging or rags  an 'article', for example batteries, lighting tubes, waste electrical or electronic equipment, end-of-life vehicles or parts of vehicles, metal waste and scrap metal  solid non-hazardous waste (except for mirror entries when the waste composition is unknown)  contaminated wood and roofing material</p>	<p>N/A</p>

<p>produced in an emergency – you must not treat or offload such wastes until you have completed a full characterisation</p>	
<p>6.1 You also may not need a representative sample if the waste is laboratory smalls in containers of less than 5 litres.</p> <p>Laboratory smalls generally contain pure chemical elements and compounds from laboratories or arise when laboratory stores are cleared.</p> <p>When drums are used for laboratory smalls, a list of the contents must be stored within the drum below the lid, or attached to the drum. Similarly for other types of packages containing laboratory smalls, a list of contents is appropriately stored within (or attached to) the packaging. Each packed drum (or other package) is then labelled with the hazard for carriage, for example under the International Carriage of Dangerous Goods by Road (ADR) treaty.</p> <p>You should provide packaging guidance to your customer or their intermediary if the person packing the laboratory smalls does not work for you.</p>	<p>N/A</p>
<p>6.2 You also may not need a representative sample of waste oil for treatment. Pre acceptance sampling is not critical for a waste oil treatment plant, but it would be required if the waste will be treated at a mineral oil refinery. Typically waste oil comes from a large number of small volume sources, such as garages, but its composition is essentially</p>	<p>N/A</p>

<p>fixed. Waste oil is any mineral-based or synthetic lubrication, or industrial oil which has become unfit for its original use. Waste oil includes:</p> <p>used combustion engine oils. gearbox oils. mineral lubricating oils. oils for turbines. hydraulic oils.</p> <p>Waste oil contaminated with more than 50 ppm of polychlorinated biphenyls (PCBs) is not included as a waste oil.</p>	
<p>6.3 You should obtain a representative sample of the following types of waste oil, from:</p> <p>industrial sites that do not normally produce waste oil other sources where chemicals and potential contaminants may be handled, for example from chemical manufacturing You should advise your customers that they must avoid contaminating waste oil. This is because during treatment low flashpoint solvents or petrol will cause handling difficulties, increase volatile organic compound (VOC) emissions and increase the risk of accidents.</p> <p>Contamination with PCBs can transfer those PCBs either to the:</p> <p>product (which may cause dioxin formation if used in a subsequent combustion process) tank bottom oil sludges effluent</p>	<p>N/A</p>

<p>If you suspect that waste oil has become contaminated, for example by solvents, petrol or PCBs, you must identify the contamination.</p>	
<p>6.4 If you do not take a pre-acceptance sample of any hazardous waste you must record the reason.</p>	<p>NUK-PRO-SHEMS-0017A PEAR: Product Enquiry Assessment Record refers.</p>
<p>6.5 If the customer has a number of containers holding the same waste, you can apply 'the square root of (N) + 1' rule to sampling those containers. Producing a composite sample of this waste may be appropriate. If the waste is variable you will need a sample from each container.</p>	<p>N/A</p>
<p>7. After fully characterising a waste, you must technically assess the waste's suitability for treatment or storage to make sure you can meet permit conditions. You must also do this to meet any Control of Major Accident Hazards (COMAH) requirements, because wastes, raw materials and end-of-waste materials all contribute to COMAH limits. You must make sure that the waste complies with the site's treatment capabilities. In the case of water based liquid waste, you may perform laboratory scale tests to predict the treatment's performance, for example on breaking of emulsion or biodegradability.</p>	<p>Navigator Terminals is an Upper Tier COMAH site. Treatment is not carried out at Navigator Terminals but by the customers treatment plant.</p>
<p>8. You can use material flow analysis to help identify the flow and fate of the components in the waste. This analysis can be helpful in choosing the most appropriate forms of treatment for the waste, either directly at the site</p>	<p>N/A treatment is carried out at customers treatment plant.</p>

<p>or at any subsequent treatment site.</p>	
<p>9. You must keep pre-acceptance records for at least 3 years (in a computerised waste tracking system) following receipt of the waste. If an enquiry from a waste producer does not lead to the receipt of waste, you do not need to keep records.</p>	<p>NUK-PRO-SHEMS-0017A PEAR: Product Enquiry Assessment Record refers. Records are kept on Eventis</p>
<p>10. You must reassess the information required at pre-acceptance if the:</p> <p>waste changes process giving rise to the waste changes waste received does not conform to the pre-acceptance information In all cases, you must reassess the information required at pre-acceptance on an annual basis.</p>	<p>NUK-PRO-SHEMS-0017A PEAR: Product Enquiry Assessment Record refers.</p>
<p>11. You must apply odour criteria to decide whether to accept wastes that are already releasing, or have the potential to release:</p> <p>mercaptans or other VOCs low molecular weight amines acrylates other similarly highly odorous materials These substances are only suitable for acceptance under special handling requirements.</p>	<p>NUK-PRO-SHEMS-0017A PEAR: Product Enquiry Assessment Record refers.</p>
<p>12. You must keep the roles and responsibilities of sales staff and technical staff separate. If sales staff are involved in waste enquiries then technical staff must do a final technical check before approval. You must keep this final technical check independent of commercial</p>	<p>NUK-PRO-SHEMS-0017A PEAR: Product Enquiry Assessment Record refers.</p>

<p>considerations, to make sure you:</p> <p>only accept wastes that are suitable for the site  avoid accumulating waste  have enough storage and treatment capacity</p>	
<p>13. Fully characterising the waste's composition is an essential step in the pre-acceptance procedure because hazardous wastes can be very complex. You must be sure you know what is in the waste so that you can safely handle or treat it. You must select analytical tests based on knowing the process that generates the waste. You must characterise the waste's composition at the pre-acceptance stage. You need to do this to make sure you comply with regulatory requirements and to work out the most appropriate waste storage, transfer or treatment route.</p>	<p>NUK-PRO-SHEMS-0017A PEAR: Product Enquiry Assessment Record refers.</p>
<p>14. For liquid waste, any or all of the following may be appropriate:</p> <p>measure the density of the sample  measure the water content  measure the ash content after calcination at 550°C  test whether the stream might inhibit biological treatment  test for cyanide, and if present determine the free and complexed cyanide levels  test for POPs</p>	<p>SDS available</p> <p>Density on SDS</p> <p>99% water info via SDS</p> <p>N/A</p> <p>N/A</p> <p>N/A</p> <p>Product break down on SDS</p>

<p>check the content of volatile and semi volatile substances</p> <p>check the mass balance of liquid waste</p> <p>You can also measure the pH, redox potential and electrical conductivity of liquid wastes.</p> <p>For pastes and oils, perform these measurements on a water extract of crude sample using a ratio of 10 l/kg of dry matter. You should mix the water with the sample in a closed container to limit exchanges with the atmosphere.</p> <p>You can also test for the 12 heavy metals (As, Ba, Cd, Cr, Cu, Hg, Mo, Ni, Pb, Sb, Se, Zn) and determine their levels individually and quantitatively. You may use any specific classical method of (partial) extraction of these metals. Where it is present, check specifically for chromium (VI). If the waste is saline (conductivity &gt; 0.15 S/m), measure the chlorides and preferably all the halogens that are soluble in water to make sure you correctly speciate the metals.</p> <p>You can also test for other metal content and other elements (for example silicon, sulphur and phosphorous).</p>	<p>N/A</p> <p>N/A</p> <p>N/A</p> <p>N/A</p> <p>N/A</p> <p>N/A</p>
<p>15. If you suspect the analysis methods applied to a liquid sample will not extract and quantify the compounds present in any solid particles or in any separate phases, separate the sample into 2 fractions by a suitable method. For example, this could be by filtration, centrifugation or decantation. Then you can</p>	<p>N/A</p>



<p>determine the mass of each fraction, and perform a comprehensive analysis of the separated liquid fraction and solid fraction, or of each phase.</p>	
<p>16. For solid waste, any or all of the following may be appropriate:</p> <p>measure the bulk density of the sample, without pre-treatment of the sample</p> <p>measure the water content</p> <p>measure the ash content after calcination at 550°C</p> <p>test for cyanide, and if present determine the free and complexed cyanide levels</p> <p>test for POPs</p> <p>check the content of volatile and semi volatile substances</p> <p>check the mass balance of solid waste</p> <p>You can also measure the pH, redox potential and electrical conductivity on a water extract of crude sample using a ratio of 10 l/kg of dry matter.</p> <p>You can also test for the 12 heavy metals (As, Ba, Cd, Cr, Cu, Hg, Mo, Ni, Pb, Sb, Se, Zn) and determine their levels individually and quantitatively. You may use any specific classical method of (partial) extraction of these metals. Where it is present, check specifically for chromium (VI). If the waste is saline (conductivity &gt; 0.15 S/m), measure the chlorides and preferably all the halogens to make sure you correctly speciate the metals.</p> <p>You can also test for other metal content and other</p>	<p>N/A</p>

elements (for example silicon, sulphur and phosphorous).	
17. When multiple immiscible phases or fractions are present in a waste, you can perform the analysis on each phase and combine them to provide the final result.	N/A SDS available
18. Analyses must be carried out by laboratories that have robust quality assurance procedures and use recognised test methods. The EN ISO 17025 accreditation represents best practice.	SDS available
19. When you agree that you will accept waste from a customer, you should decide and record what parameters you will check at the acceptance stage. The checks could be visual (for example colour, phase, fuming), physical (for example pumpability, form), chemical (for example pH range, maximum acceptable metals content) or odour based parameters. You should define the acceptable tolerance for each acceptance test result and record which of these criteria could lead to further testing, non-conformance or rejection. The person checking the waste for acceptance can also decide on their own additional parameters.	SDS available
<b>3.2 Waste Acceptance</b>	
1. You must follow waste acceptance procedures to check that the characteristics of the waste you receive match your pre-acceptance information. This is to confirm that the waste is as expected and you can accept it. If it is not, you must confirm that you can accept it as a non-	Wastewater is coming from one customer only, has been tested and SDS is available.

<p>conforming waste, or you must reject it.</p>	
<p>2. Your procedures should follow a risk-based approach, considering:  the source, nature and age of the waste  the waste's hazardous properties  potential risks to process safety, occupational safety and the environment (for example, from odour and other emissions)  potential for self-heating, self-reactivity or reactivity to moisture or air  knowledge about the previous waste holder(s)</p>	<p>Covered in NUK-PRO-SHEMS-0017A PEAR: Product Enquiry Assessment Record refers.</p>
<p>3. Other than in an emergency (for example, taking waste from an emergency incident clean-up), you must only receive pre-booked wastes onto site that have been adequately pre-accepted and are consistent with the pre-acceptance information.</p>	<p>N/A</p>
<p>4. All relevant storage areas (quarantine, reception and general) and treatment processes in your facility must have physical capacity for the waste you receive. You must not receive wastes if this capacity is not available. The amount of waste you receive must also comply with storage limits in your permit and the limits set under COMAH.</p>	<p>Dedicated system including tanks, pumps and pipeline. No change to Hazardous consent quantities on permit.</p>
<p>5. You must visually check wastes or their packaging and verify them against pre-acceptance information and transfer documentation before you accept them on site. The extent of the initial visual check is determined by the waste type and how it is packaged.</p>	<p>Bill of Laden/Shipping book and pre arrival checks refers.</p>

<p>6. You must check and validate all transfer documentation and resolve discrepancies before you accept the waste. If you believe the incoming waste classification and description is incorrect or incomplete, then you must address this with the customer during waste acceptance. You must record any non-conformances. If you have assessed the waste as acceptable for on-site storage or treatment, you must document this.</p>	<p>Bill of Laden/Shipping book and pre arrival checks refers.</p>
<p>7. You must have clear criteria for non-conforming wastes including rejection of such waste. You must also have a written procedure for recording, reporting and tracking non-conforming wastes, including notifying the relevant customer or waste producer, and the regulator.</p>	<p>Bill of Laden/Shipping book and pre arrival checklists are all used before product is discharged to tanks.</p>
<p>8. You must weigh each load of waste on arrival to confirm the quantities against the accompanying paperwork, unless alternative reliable systems are available (for example, based upon density and volume). You must record the weight in the computerised waste tracking system.</p>	<p>Bill of Laden/Shipping book and pre arrival checklists are all used before product is discharged to tanks.</p>
<p>9. The person carrying out waste acceptance checks must be trained to effectively identify and manage any non-conformances in the loads received, complying with this guidance and your permit conditions.</p>	<p>N/A Liquid waste, vessel to shore side dedicated tanks.</p>
<p>10. If there is a known risk of radioactive contamination, you must check the waste to determine that it does not include radioactive material,</p>	<p>N/A?</p>

unless you are permitted to accept these materials.	
11. You must minimise the manual handling of waste. You should use mechanical unloading technologies where it is possible, safe and practicable to do so.	Normal operational best practice to minimise manual handling.
12. Offloading, sampling, general storage, reception and quarantine areas must have an impermeable surface with self-contained drainage, to prevent any spillage entering the storage systems or escaping off site.	COMAH Site.
13. The designated sampling point or reception area must be close to the laboratory or checking area and needs to be visible.	N/A
14-23 Acceptance of containerised waste	N/A
24. Bulk loads (liquid or solid) can only be offloaded after they have been fully verified as compliant. You must not accept a non-compliant bulk load for interim storage except in an emergency. Verification testing should include:  checking consistency with the pre-acceptance information compatibility with the receiving vessel contents where appropriate, checking treatability by using laboratory scale simulation	Bill of Laden/Shipping book and pre arrival checks refers.
25. Deliveries in a tanker must be accompanied by a 'wash out' certificate or a declaration of the previous load so that contamination by this route can be checked.	N/A
26. Samples from tankers should wherever possible be taken representatively by taking a core sample from the top hatch and from a suitable	N/A

gantry. You must sample from each compartment where the tanker is divided into multiple compartments. If you have to take a sample from the back valve, you must take precautions to avoid spillages.	
27-39 Acceptance sampling	N/A customer owner product. Product will be transferred to their site for recovery.
40-41 Testing and analysis	N/A SDS available
<b>3.3 Waste Tracking</b>	
1. You must use a computerised tracking system to hold up-to-date information about the available capacity of the waste quarantine, reception, general and bulk storage areas of your facility, including treatment residues and end-of-waste product materials.	QINO our stock management system, records and automatically updates available capacity in tanks. QINO controls product compatibility for tanks, pumps and pipelines and is HMRC approved
2. Your waste tracking system must hold all the information generated during:  pre-acceptance acceptance non-conformance or rejection storage repackaging treatment removal off site This information must be easily accessible.	As above
3. You must create records and update them to reflect deliveries, on-site treatment and despatches. Your tracking system will also operate as a waste inventory and stock control system. It must include this information as a minimum:  the date the waste arrived on site the original producer's details the previous holder a unique reference number waste pre-acceptance and acceptance information	As above where applicable

<p>any analysis results</p> <p>the package type and size</p> <p>the intended treatment or transfer route</p> <p>accurate records of the nature and quantity of wastes held on site, including all hazards – and identifying the primary hazards</p> <p>where the waste is located on site</p> <p>where the waste is in the designated treatment or transfer route</p> <p>the names of staff who have taken any decisions about accepting or rejecting waste streams and who have decided on recovery or disposal options</p> <p>details that link each container accepted to its consignment or transfer note</p> <p>details of any non-conformances and rejections</p>	
<p>4. The tracking system must be able to report:</p> <p>the total quantity of waste present on site at any one time</p> <p>a breakdown by type of the waste quantities you are storing pending treatment or transfer</p> <p>a breakdown of the waste quantities by hazardous property</p> <p>an indication of where a batch or consignment of waste is located on a site plan</p> <p>the quantity of waste on site compared with the limits authorised by your permit</p> <p>the length of time the waste has been on site</p> <p>the quantity of end-of-waste product materials on site at any one time, where applicable</p>	<p>As above</p>
<p>5. You must store back-up copies of computer records off</p>	<p>Navigator has a secondary server back-up</p>

<p>site. Records must be easily accessible in an emergency.</p>	
<p>6. You must hold acceptance records for a minimum of 2 years after you have treated the waste or removed it off site. You may have to keep some records for longer if they are required for other purposes, for example, hazardous waste consignment notes.</p>	<p>Shipping books are kept for 2 years. NUK-PRO-SHEMS-0017A PEAR: Product Enquiry Assessment Record held electronically.</p>
<p><b>4. Waste storage, segregation and handling appropriate measures</b></p>	
<p>1. You must store waste in locations that minimise the handling of waste. Waste handling must be carried out by competent staff using appropriate equipment.</p>	<p>Dedicated system, trained competent staff document Navi 08 &amp; 09 refers for staff competence.</p>
<p>2. Where possible, you should locate storage areas away from watercourses and sensitive perimeters (for example, those close to public rights of way, housing or schools). You must store all waste within the secure area of your facility to prevent unauthorised access and vandalism.</p>	<p>The site is an Upper Tier COMAH site and has palisade fencing and gated entry/exit control.</p>
<p>3. Where relevant, you must conform to HSE standards and in particular to:</p> <p>HSG51 Storage of flammable liquids in containers HSG71 Chemical warehousing: storage of packaged dangerous substances HSG76 Warehousing and storage: a guide to health and safety HSG140 Safe use and handling of flammable liquids HSG176 Storage of flammable liquids in tanks</p>	<p>The site is an Upper Tier COMAH site and conforms to COMAH regulations and the requirements of the environmental permit EPR/FP3433DX/T001.</p>



CS21 Storage and handling of organic peroxides	
4. You must clearly document the maximum storage capacity of your site and the designated storage areas. You must not exceed these maximum capacities. You should define capacity in terms of, for example, maximum tank or vessel capacities, tonnage and numbers of skips, pallets or containers. You must regularly monitor the quantity of stored waste on site and designated areas and check against the allowed maximum capacities.	Dedicated storage system all captured on QINO.
5. You must clearly mark hazardous waste storage areas and provide signs showing the maximum quantity and hazardous properties of wastes that can be stored there.	N/A liquid waste stored in dedicated tanks.
6. Storage area drainage infrastructure must:  contain all possible contaminated run-off prevent incompatible wastes coming into contact with each other make sure that fire cannot spread	Tanks situated in bunds as per COMAH requirements.
7. Secondary and tertiary containment systems must conform to CIRIA guidance C736 Containment systems for the prevention of pollution	The Tanks are situated with in bunds and pairs of bunds are linked together via a 36 inch pipeline which acts as tertiary containment. This model has been accepted by EA inspector.
8. You must store containerised wastes that are sensitive to air, light, heat, moisture or extreme ambient temperatures under cover protected from such ambient conditions. Covered areas must have good ventilation. This applies to any such container:	N/A

<p>held in general storage, reception storage (pending acceptance) or quarantine being emptied, repackaged or otherwise managed</p> <p>For example, waste held in fibre or cardboard primary or secondary packaging should be stored under cover in a dry area and not exposed to rain or moisture. It must be kept off floors to prevent damage by damp.</p>	
<p>9. You must store wastes in sealed metal containers under cover if they have the potential for self-heating or self-reactivity. You must monitor the containers for heat build-up. Such wastes include rags and filter materials contaminated with metal swarf, low boiling point oils or low flash point solvents.</p>	N/A
<p>10. Wherever practicable you should store all other wastes under cover. Covered areas must have good ventilation. This applies to any such container:</p> <p>held in general storage, reception storage (pending acceptance) or quarantine being emptied, repackaged or otherwise managed</p> <p>Under cover storage provides better protection for containers than open air storage and minimises the generation of contaminated water. Covered storage also:</p> <p>lowers temperature fluctuations that can cause pressure build up in containers</p> <p>reduces the degradation of containers through weathering</p>	N/A
<p>11. You must not store hazardous waste in open-</p>	N/A

<p>topped containers. Empty open-topped containers should be kept in a building or undercover to prevent rainwater ingress.</p>	
<p>12. You must not store or hold wastes on site in vehicles or vehicle trailers unless you are receiving them or preparing them for imminent transfer (meaning that you will remove them from site within 24 hours, or 72 hours if over a weekend).</p>	<p>N/A</p>
<p>13. You should pay particular attention to avoid the build-up of static electricity when you are storing or handling flammable wastes and materials. You should use leak detection systems and alarms (for example VOC alarms) and automatic fire suppression equipment based on a recorded risk assessment.</p>	<p>Tanks are earthed, reduced flow when filling an empty tank. Site has Fire Pre-Plans in place.</p>
<p>14. You must provide adequate bunding of all storage areas, and containment and treatment of any water run-off.</p>	<p>Tanks are situated within bunds.</p>
<p>15. You must not accumulate waste. You must treat wastes, or remove them from the site, as soon as possible. Generally you should do this within one month of receipt but all wastes must be removed within 6 months of receipt. This applies even when the waste might be used as a reactant. Where a shorter time period is given in a permit condition you must comply with the permit for that waste. Where a waste is stored for longer than allowed you must inform the Environment Agency.</p>	<p>This product will be held in suitable infrastructure/tanks.</p>
<p>16. All stored containers must keep the labelling they had at acceptance. If the label is damaged or no longer legible</p>	<p>N/A</p>

you should replace the label with that same information.	
17. You must handle and store containers so that the label is easily visible and continues to be legible.	N/A
18. You should keep solid waste dry and avoid the dilution of hazardous waste.	N/A
19. You must keep clean rainwater and clean cooling water separate from wastes and waste waters.	N/A
20. You must keep incompatible wastes segregated so that they cannot come into contact with one another. You must store flammable wastes apart from other wastes to prevent fire spreading between them and other materials. You must use sealed drainage systems to prevent leaks and spillages contaminating other wastes.	Dedicated system within bunds that have locked closed penstock valves connecting to the site effluent system.
21. There must be pedestrian and vehicular access (for example, forklift) at all times to the whole storage area so that you can retrieve containers without removing others that may be blocking access – other than removing those in the same row.	N/A
22. You must store all waste containers in a way that allows easy inspection. You must maintain safe access, with a gap of at least 0.7m between rows of bulk containers or palletised wastes.	N/A
23. You must move drums and other mobile containers between different locations (or loaded for removal off site) following written procedures. You must then amend your waste tracking system to record these changes.	N/A

<p>24. You must stack bags and boxes of waste no more than 1m high on a pallet. You must not stack pallets more than 2 high.</p>	<p>N/A</p>
<p>25. You must stack containers specifically designed for stacking, and no more than 2.2m high on a pallet.</p>	<p>N/A</p>
<p>26. You must store all other containers on pallets. You must not stack these pallets more than 2 high, except for empty containers which can be stacked 3 high.</p>	<p>N/A</p>
<p>27. Stacked bags, boxes and containers must be stable. They must be secured with, for example, banding or shrink-wrap, if required. The packages must not extend beyond (over-hang) the sides of the pallet. Any shrink-wrap used must be clear or transparent so that you can identify waste types, damaged containers, leaks or spillages and incorrectly stacked containers. You must be careful not to damage any packages during stacking.</p>	<p>N/A</p>
<p>28. All waste containers must remain fit for purpose. You must check any containers (and pallets they may be stored on) daily and record non-conformances. Non-compliant containers and pallets must be made safe. You must immediately and appropriately manage any unsound, poorly labelled or unlabelled containers (for example, by relabelling, over drumming and transferring the container's contents). You must risk assess, approve and record the use of containers, tanks and vessels:</p>	<p>N/A</p>

beyond their specified design life where you use them for a purpose, or substances, other than the ones they were designed for	
29. You must not handle waste or its packaging in a way that might damage its integrity, unless it is appropriate to destroy a waste or its packaging, for example by shredding. You must not, for example, walk on or throw waste or waste packages.	N/A
30. You should, where applicable and based on a recorded risk assessment, make inert the atmosphere of tanks containing organic liquid waste with a flashpoint less than 21°C. This can be done, for example, by using nitrogen gas.	N/A
31. You must store asbestos waste double bagged or wrapped, in sealed, closed and locked containers. You must not store asbestos waste loose. You must not put asbestos wastes into bays or transfer it between different skips or containers. You must not use mechanical equipment, for example loading shovels, chutes and conveyors to move asbestos waste.	N/A
32. You must not stack wheeled containers on top of one another. Do not stack empty wheeled containers into one another more than 2.2m high.	N/A
33. All containers that need them should have a lid or bung, and the lid or bung must be closed except when the container is being sampled, having waste added into it or having waste removed from it.	N/A

<p>34. You must not stack skips containing waste. Skips containing hazardous waste must be enclosed when not being loaded or unloaded. You should store loose bulk hazardous wastes under cover.</p>	<p>N/A</p>
<p>35. You can use racking systems to store waste but you must consider segregation, ability to inspect, separation and fire suppression measures. Racking systems must be designed and constructed in accordance with HSG76 Warehousing and storage.</p>	<p>N/A</p>
<p>36. You must:</p> <p>contain wash waters within an impermeable area and either discharge them to foul sewer or dispose of them appropriately off site.</p> <p>prevent run-off into external areas or to surface water drains</p>	<p>N/A</p>
<p>37. You must manage waste in a way that prevents pests or vermin. You must have specific measures and procedures in place to deal with wastes that are identified as causing pests or vermin.</p>	<p>N/A</p>
<p>38. You must inspect storage areas, containers and infrastructure daily. You must deal with any issues immediately. You must keep written records of the inspections. You must rectify and log any spillages of waste.</p>	<p>Daily bund inspections and maintenance regime with finding recorded. All spillages are rectified immediately and recorded on Eventis.</p>
<p>39. You must train forklift drivers in the handling of palletised goods, to minimise forklift truck damage to the integrity of containers and infrastructure.</p>	<p>N/A</p>

<p>40. You must not carry out activities that represent a clear fire risk within any storage area. Examples include:</p> <p>grinding welding or brazing of metalwork smoking parking normal road vehicles, except while unloading or loading recharging batteries</p>	<p>All activities are controlled under a safe system of work.</p>
<p><b>Bulk Storage</b></p>	
<p>41. Where relevant, bulk storage systems must conform to CIRIA guidance, and in particular to:</p> <p>C535 Above ground proprietary prefabricated oil storage tank systems C598 Chemical storage tank systems - good practice C736 Containment systems for the prevention of pollution</p>	<p>All bulk storage systems conform with COMAH regulations.</p>
<p>42. You must use tanks and associated equipment that are suitably designed, constructed and maintained. You must do a risk assessment to validate the design and operation of bulk storage systems. Before you use new tanks and equipment you must check they are working correctly. You must periodically examine and test that your tanks meet the standards set out in EEMUA Publication 231: The mechanical integrity of plant containing hazardous substances.</p>	<p>As above. Periodical examinations are carried out as per EEMUA and records kept.</p>
<p>43. You should vent bulk storage tanks and silos through suitable abatement.</p>	<p>Storage tanks have PRV's fitted.</p>
<p>44. You must locate bulk storage vessels on an impermeable surface which is resistant to the material being</p>	<p>Earth/clay bund walls and floors. Bunds that have locked closed penstock valves connecting to the site effluent system.</p>



<p>stored. The surface must have self-contained drainage to prevent any spillage entering the storage systems or escaping off site. Impermeable surfaces must have sealed construction joints.</p>	
<p>45. You must provide bunds for all tanks containing liquids (whether waste or otherwise) which could be harmful to the environment if spilled. Bunds must meet the CIRIA C535 or C736 standard and:</p> <ul style="list-style-type: none"> <li>be impermeable, stable and resistant to the stored materials.</li> <li>have no outlet (that is, no drains or taps), and drain to a blind collection point.</li> <li>have pipework routed within bunded areas with no penetration of contained surfaces.</li> <li>be designed to catch leaks from tanks or fittings.</li> <li>have a capacity calculated following the relevant CIRIA guidance.</li> <li>have regular visual inspections – you must pump out or remove any contents under manual control after you have checked for contamination.</li> <li>be fitted with a high-level probe and an alarm (as appropriate) if not frequently inspected.</li> <li>have tanker connection points within the bund where possible – if not possible you must provide adequate containment for spillages or leakage.</li> <li>have programmed engineering inspections (extending to water testing if structural integrity is in doubt)</li> <li>be emptied of rainwater regularly to maintain the containment capacity</li> </ul>	<p>Earth/clay bund walls and floors. Site bund improvements are on going and EA inspector is aware and has seen the improvements. Any pipe penetrating the bund wall has bentonite plugs fitted. Bund improvement works include tertiary containment.</p> <p>Regular bund visual inspections are carried out and recorded. Rainwater is emptied daily if required.</p>

<p>46. You must control sludge build up and foam in tanks, for example by regularly sucking out the sludge and using anti foaming agents.</p>	<p>N/A</p>
<p>47. You should equip storage and treatment tanks with an automatic level monitoring system and an associated alarm or trip system. These systems must be sufficiently robust (for example, be able to work if sludge and foam are present) and regularly maintained. You must fit tanks with suitable overfill protection.</p>	<p>Automatic tank gauging with associated alarms are fitted. Overfill protection is fitted.</p>
<p>48. You must be able to close all connections to vessels, tanks and secondary containment via suitable valves. You must fit a valve close to the tank if you have bottom outlets, and have at least 2 isolation points in case of valve failure.</p>	<p>The dedicated system are a full arrangement of valves for tanks, pumps and jetty isolation. Tank side valves are fitted. 2 valve isolation is a Navigator Standard.</p>
<p>49. You must direct overflow pipes to a contained drainage system (for example the relevant secondary containment) or to another vessel where suitable control measures are in place.</p>	<p>N/A.</p>
<p>50. Tanks, pipework and fittings must be examined by a competent person, following a written scheme. The scope and frequency of examination must also be determined by a competent person. You must work out how often to carry out these internal examinations using a risk assessment approach. This should be based on:</p> <p>tank service maintenance history known and potential damage mechanisms and their rates of attack</p>	<p>Tanks, pipework, and any fitting such as PRV's are subject to a written scheme of examination, carried out by competent people.</p>

<p>You should also do intermediate external examinations. You must act on the results of the examinations and do any necessary repairs to ensure the tanks remain fit for service. You must keep the results of examinations and repairs.</p>	
<p>51. You must have systems in place to make sure that loading, unloading and storage are safe, considering any associated risks. This can include:</p> <p>having piping and instrumentation diagrams  using ticketing systems  using key locked coupling systems  having colour coded points, fittings and hoses  using specific coupling or hose sizes for certain waste transfers</p>	<p>Upper Tier COMAH, site all systems undergo Hazops and Management of Change which capture these points mentioned plus more.</p>
<p>52. As a general rule, you must not use open topped tanks, containers, vessels or pits to store or treat hazardous or liquid wastes.</p>	<p>N/A</p>
<p><b>Transfer of waste into and from tankers. 53-70</b></p>	<p>N/A</p>
<p><b>Aerosol storage 71-77</b></p>	<p>N/A</p>
<p><b>Sorting, repackaging and bulking 78-89</b></p>	<p>N/A</p>
<p><b>Laboratory smalls 90-92</b></p>	<p>N/A</p>
<p><b>5. Waste treatment appropriate measures</b></p>	<p>N/A</p>
<p><b>6. Emissions control appropriate measures</b></p>	
<p><b>6.1 Point Source emissions to air</b></p>	
<p>1. You must contain storage tanks, silos and waste treatment plant (including shredders) to make sure you collect, extract and direct all process emissions to an</p>	<p>Tank fitted with PRV's. Emissions to air are reported annually.</p>

appropriate abatement system for treatment before release.	
2. You must identify the main chemical constituents of the site's point source emissions as part of the site's inventory of emissions to air.	Carried out annually.
3. You must assess the fate and impact of the substances emitted to air, following the Environment Agency's risk assessment methodology.	N/A See Navi 10.
4. To reduce point source emissions to air (for example, dust, volatile organic compounds and odour) from the treatment of waste, you must use an appropriate combination of abatement techniques, including one or more of the following systems:  adsorption (for example, activated carbon) biofiltration wet scrubbing fabric filters high efficiency particulate (HEPA) filtration condensation and cryogenic condensation cyclonic separation electrostatic precipitation thermal oxidation	N/A
5. You must assess and design vent and stack locations and heights to make sure dispersion capability is adequate. Where monitoring is required, including for odour, you must install suitable monitoring points.	N/A
6. Your procedures must make sure you correctly install, operate, monitor and maintain abatement equipment. For example, this includes monitoring and maintaining:	N/A

appropriate flow and chemical concentration of scrubber liquor the handling and disposal or regeneration of spent scrubber or filter medium	
7. You should design and operate abatement systems to minimise water vapour plumes.	N/A
<b>6.2 Fugitive emissions to air</b>	N/A
<b>6.3 Emissions of noise and vibration</b>	
1. You should design the facility so that potential sources of noise (including building exits and entrances) are away from sensitive receptors and boundaries. You should locate buildings, walls, and embankments so they act as noise screens.	N/A existing site
2. You must employ appropriate measures to control noise, for example, including:  adequately maintaining plant or equipment parts which may become more noisy as they deteriorate – for example, bearings, air handling plant, building fabric, and specific noise attenuation kit associated with plant or machinery closing doors and windows of enclosed areas and buildings avoiding noisy activities at night or early in the morning minimising drop heights and the movement of waste and containers using broadband (white noise) reversing alarms and enforcing the on-site speed limit using low-noise equipment, for example, drive motors, fans, compressors and pumps adequately training and supervising staff	Maintenance regime in place.  N/A N/A N/A N/A N/A Trained competent staff with supervisor on each shift.

where possible, providing additional noise and vibration control equipment for specific sources of noise – for example, noise reducers or attenuators, insulation, or sound-proof enclosures	N/A
<p>3. Where noise or vibration pollution at sensitive receptors is expected, or has been substantiated, you must create, use and regularly review a noise and vibration management plan. This must be part of the environmental management system, and must include:</p> <p>actions and timelines to address any issues identified  a procedure for noise and vibration monitoring  a procedure for responding to identified noise and vibration events, for example, complaints</p>	N/A
<p>4. Your noise and vibration management plan should also include a noise and vibration reduction programme designed to:</p> <p>identify the sources of noise and vibration  measure or estimate noise and vibration exposure  characterise the contributions of the sources  implement prevention and reduction measures</p>	N/A
5. Where a noise and vibration management plan is required, you must develop and implement it following our guidance.	N/A
<b>7. Emissions monitoring and limits appropriate measures</b>	
<b>7.1 Emissions to air</b>	
1. Your facility's emissions inventory must include information about the relevant	Where applicable any emissions to air will be captured in Navigator Terminals North Tees

<p>characteristics of point source emissions to air, such as the:</p> <p>average values and variability of flow and temperature. average concentration and load values of relevant substances and their variability. flammability, lower and higher explosive limits and reactivity. presence of other substances that may affect the waste gas treatment system or plant safety – for example, oxygen, nitrogen, water vapour, dust</p>	<p>annual emission return; example is document Navi 07. Note: product is 99% water</p>
<p><b>7.2 Emissions to water or sewer</b></p>	
<p>1. Your facility's emissions inventory must include information about the relevant characteristics of point source emissions to water or sewer, such as:</p> <p>average values and variability of flow, pH, temperature, and conductivity average concentration and load values of relevant substances and their variability – for example, COD (chemical oxygen demand) and TOC (total organic carbon), nitrogen species, phosphorus, metals, priority substances or micropollutants data on bio-eliminability – for example, BOD (biochemical oxygen demand), BOD to COD ratio, Zahn-Wellens test, biological inhibition potential, for example, inhibition of activated sludge</p> <p>2. For relevant emissions to water or sewer identified by the emissions inventory, you must monitor key process parameters (for example, waste water flow, pH,</p>	<p>There is no direct emissions to water of sewer. The site effluent system has a series of lagoons and a separate buffer tank of approx. 18,000m<sup>3</sup>. All effluent is treated prior to discharge but the 3<sup>rd</sup> party owner.</p>

<p>temperature, conductivity, or BOD) at key locations. For example, these could either be at the:</p> <p>inlet or outlet (or both) of the pre-treatment inlet to the final treatment point where the emission leaves the facility boundary</p>	
<p><b>8. Process efficiency appropriate measures</b></p>	
<p>1. For your facility, you must monitor and review the annual quantity of:</p> <p>water, energy and raw materials used residues and waste water produced You must do this at least once a year.</p>	<p>Navi 11 ERP Forms Schedule 4 01.01.2020 – 31.12.2020 North Tees FP3433DX refers.</p>
<p><b>8.1 Energy efficiency</b></p>	
<p>1. You must create and implement an energy efficiency plan at your facility. This must:</p> <p>define and calculate the specific energy consumption of the activity (or activities) you do and waste stream(s) you treat set annual key performance indicators – for example, specific energy consumption (expressed in kWh/tonne of waste processed) plan periodic improvement targets and related actions</p>	<p>NUK-POL-OPS-0006 UK Energy Policy and Framework refers</p>
<p>2. You must regularly review and update your energy efficiency plan as part of your facility's management system.</p>	<p>NTN-ENV-ASP-0003 Environmental Aspects Register – Energy refers</p>
<p>3. You must have and maintain an energy balance record for your facility. This must provide a breakdown of your energy consumption and generation (including any energy or heat exported) by the type of source (electricity, gas, conventional</p>	<p>N/A No treatment carried out on site</p>



<p>liquid fuels, conventional solid fuels and waste). You should provide Sankey diagrams or energy balances to show how energy is used in your waste treatment processes.</p>	
<p>4. You must regularly review and update your energy balance record as part of your facility's management system, alongside the energy efficiency plan.</p>	<p>N/A as above</p>
<p>5. You must have operating, maintenance and housekeeping measures in place in relevant areas, for example for:</p> <p>air conditioning, process refrigeration and cooling systems (leaks, seals, temperature control, evaporator or condenser maintenance)</p> <p>the operation of motors and drives</p> <p>compressed gas systems (leaks, procedures for use)</p> <p>steam distribution systems (leaks, traps, insulation)</p> <p>space heating and hot water systems</p> <p>lubrication to avoid high friction losses</p> <p>boiler operation and maintenance, for example, optimising excess air</p> <p>other maintenance relevant to the activities within the facility</p>	<p>NUK-PRO-SHEMS-0042 Safety Health &amp; Environmental Management System - Terminal Energy Walk-Round Assessment refers</p>
<p>6. You must have measures in place to avoid gross energy inefficiencies. These should include, for example:</p> <p>insulation</p> <p>containment methods (such as seals and self-closing doors)</p> <p>avoiding unnecessary discharge of heated water or</p>	<p>NUK-POL-OPS-0006 UK Energy Policy and Framework refers</p>

air (for example, by fitting timers and sensors)	
7. You should implement additional energy efficiency measures at the facility as appropriate, following our guidance.	NUK-POL-OPS-0006 UK Energy Policy and Framework refers
<b>8.2 Raw materials</b>	N/A
<b>8.3 Water use</b>	N/A no more water use than already used.
<b>8.4 Waste minimisation, recovery and disposal</b>	N/A no treatment of waste. Product is owned by a customer and is sent to customers treatment plant via ship.