Appropriate Meassures Assessment

N&P Hartlepool MRF Ltd

30th May 2025

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Appropriate Meassures Assessment

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1. APPROPRIATE MEASURES ASSESSMENT

This document has been prepared by Sol Environment on behalf of N&P Hartlepool MRF Ltd (hereafter referred to as 'the client' or 'N&P') to provide an Appropriate Measures Assessment against the *Environment Agency 'Non-hazardous and inert waste: appropriate measures for permitted facilities* guidance.

The table below outlines the key requirements of the guidance document and demonstrates how the site will meet these requirements or, where compliance is not possible, justifies any deviations and details the alternative measures that will be implemented.

Guidance	Appropriate measures met - Yes/No	Justification – Alternative Measures
1.0 When appropriate measures apply		
1.1 Who this guidance is for		*Information provided for reference only*
1.2 Assessing appropriate measures for your site		*Information provided for reference only*
1.3 Implementing appropriate measures at new and existing facilities		*Information provided for reference only*
1.4 Site Design and Suitability		
You should consider the potential impacts of climate change when selecting a site especially: • flood risk • drought • extreme temperatures • extreme weather events	Yes	All site design and suitability measures have been considered for the operation of the new Hammer Mill in line with the appropriate measures. All specific details are provided within the Application Support Document.
You should have enough space on site to manage wastes and to make sure that you minimise potential pollution impacts on nearby receptors. For example, you		

should have enough space for appropriate fire breaks between stockpiles of combustible waste, and to allow access for fire-fighting.		
The storage and handling of waste on site must be located as far as technically and economically possible from sensitive receptors and watercourses, while minimising unnecessary handling. Access doors should be on the side of buildings opposite to sensitive receptors.		
You must have enough space on site to operate your plant and equipment safely, and to segregate waste to prevent cross-contamination. Environmental permits set limits on the amount of waste an operator can bring onto site on an annual basis. The permit may also set other capacity limits, for example the maximum quantity of a particular waste type at any one time.		
The physical capacity of your site may not be large enough to safely handle, without causing pollution, the amount of waste your permit allows. You must make sure that the quantities of waste at your facility are manageable at all times and do not exceed your capacity to store and treat waste.		
At the design stage you should consider: • how you will monitor emissions from your site • the access to waste treatment processes so you can take representative samples		
2.0 General Management		
2.1 Management System You must have an up-to-date management system and activities at your facility must follow it. Your management system must incorporate the following features:	Yes	The site has an existing EMS System which has been certified to ISO 14001:2015 and meets the relevant sections of the appropriate measures.
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, so you can identify pollution risks and minimise them through appropriate measures		
You plan and establish the resources, procedures, objectives and targets needed for environmental performance alongside your financial planning and investment.		
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 • management of change • emergency preparedness and response • making sure you comply with environmental legislation		
You check environmental performance and take corrective action, paying particular attention to: • 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		
Senior managers review the management system to check it is still suitable, adequate and effective at least annually. Improvements should be carried out within a reasonable time.		
You review the development of cleaner technologies and their applicability to site operations. We would expect cleaner technologies to be considered: • as a result of substantiated pollution incidents • when reviewing management systems • when planning investment decisions, for example new items of plant		
When designing new plant, you make sure that you assess the environmental impacts from the plant's operating life and eventual decommissioning. You must make sure that new plant is authorised by your environmental permit.		
You must have a written procedure for proposing, considering and approving changes to procedures or infrastructure that are related to the storage or treatment of waste or pollution control.		
You consider the risks that a changing climate poses to your operations. You have appropriate plans in place to assess and manage future risks.		
You compare your facility's performance against relevant sector guidance and standards on a regular basis, known as sectoral benchmarking.		
You have and maintain the following documentation as part of your management system: • inventory of emissions to air and water • residues management plan		

• accident management plan • site infrastructure plan • site condition report for new facilities or where you are increasing the facility's area • 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, unless your facility does not handle combustible waste • climate change risk assessment, if required		
Your management system must include a schedule of inspection and maintenance for all pollution control infrastructure, including for example the: • impermeable surfacing and drainage system • gas ducts of abatement systems		
You must have a document control procedure that clearly describes how and when you will periodically review documentation and maintain version control.		
Your management system must clearly set out the actual physical capacity of your facility to store and handle waste, which may be less than the quantity limits allowed by your permit. You must specify limits for the maximum: • waste storage capacity at any one time • daily and annual throughputs • residence time for waste		
When doing this, you must take into account the characteristics of your facility, the waste types and the pollution risks, for example fire and odour.		

Your limits must also reflect the constraints of the available space and processes. You must include factors like seasonal changes in supplies of inputs, and markets for outputs. Further information on determining capacity is available in our RGN 2 guidance.		
2.2 Staff Competence Your facility must be operated at all times by an adequate number of staff with appropriate training, qualifications and competence. You must keep records of training, qualifications and relevant experience.	Yes	The site is manned and operated by appropriately trained site operatives. The site is manned 24 hours a day. Any member of site staff or site security will raise the alarm in the event of an incident. All training records are kept as part of the sites EMS. The design, installation and maintenance of the Hammer Mill has been / will be carried out by competent people. The Site Manager has the relevant WAMITAB qualifications for the operations on site.
If you operate a 24-hour process, you must have: • remote or telemetric systems to make sure an alarm would be raised in the event of an incident during unmanned hours • appropriate personnel on call to deal with these incidents You must explain these procedures in your management system.		
The design, installation and maintenance of infrastructure, plant and equipment must be carried out by competent people.		
You must have appropriately qualified managers for your waste activity who are members of a government approved technical competence scheme.		
Staff undertaking waste acceptance checks, including sampling and analysis of waste, must be appropriately trained and competent to: • classify and characterise waste properly, • identify whether it is suitable for your facility • manage any loads that do not conform to waste acceptance criteria • determine end of waste products		
2.3 Accident Management Plan As part of the management system you must have a plan for dealing with any incidents or accidents that could result in pollution, including near misses.	Yes	The Site will operate in accordance with the existing Accident Management Plan which forms part of the site's

The accident management plan must identify and assess the risks the facility poses to human health and the environment. Particular areas to consider may include: • waste types • transferring substances, for example filling (including overfilling) or emptying of vessels and containers • preventing incompatible substances coming into contact with each other • failure of plant and equipment, for example over-pressure of vessels and pipework, or blocked drains • failure of containment, for example bund failure or drainage sumps overfilling • making the wrong connections in drains or other systems • failure to contain firefighting water • failure of abatement systems • hazardous atmospheres in confined spaces • failure of main services, for example power, steam or cooling water • checking the composition of effluents before their emission • vandalism and arson • operator error • accessibility of control equipment in emergency situations • extreme weather conditions, for example flooding or very high winds		EMS and meets the relevant sections of the appropriate measures.
You must assess the risk of accidents and their possible 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 six questions: • how likely is it that the accident will happen? • 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?		
The depth and type of accident risk assessment you carry out will depend on the characteristics of your facility and its location. The main factors to take into account are the: • scale and nature of the accident hazard presented by the facility and its activities • risks to areas of population and the environment (the receptors)		
Through your accident management plan, you must also identify the roles and responsibilities of the staff involved in managing accidents. You must provide them with clear guidance on how to manage each accident scenario.		
You must have a suitably trained facility employee available at all times who will act as an emergency coordinator and will take lead responsibility for implementing the accident management plan.		
You must train your employees so they can perform their duties effectively and safely and know how to respond to an emergency.		
You must also: • show how you will communicate with relevant authorities, emergency services and neighbours, as appropriate, before, during and after an accident • implement emergency procedures, including for safe plant shutdown and site evacuation • implement post-accident procedures that include undertaking an assessment of the harm that may have been caused by an accident and the remediation actions you will take		

• consider the impact of accidents on the function and integrity of plant and equipment • have contingency plans to relocate or remove waste from the facility, and suspend incoming waste • test the accident management plan by carrying out emergency drills and exercises		
After a flooding event you must inspect and assess the integrity of affected plant and equipment, in particular infrastructure that may have been in contact with floodwater or groundwater. Tank inspections may include non-destructive testing methods to verify their integrity.		
You must take the following measures, where appropriate, to prevent events that may lead to an accident. You must have appropriate procedures set out in your accident management plan.		
Preventing Accidental Emissions You must make sure that you contain the following (where appropriate) and route to the effluent system (where necessary and lawful): • process waters • site drainage waters • emergency firefighting water • chemically contaminated waters • spillages	Yes	No waste water will be discharged from the site. In the event of an emergency, all surface water drainage systems would be isolated through use of a shut off gate valve to prevent water release to storm sewer. The site has a dedicated spill procedure in place. Firewater will be managed in accordance with the site's Fire Prevention Plan. The site's accident and emergencies procedures are detailed within the Accident Management Plan. The site is manned 24 hours a day and any member of site staff or site security will raise the alarm as soon as they become aware of any incident or emergency.
You must have planned how you will manage the impacts of tidal surges and storm water flows You must consider abnormal operating scenarios and incidents for example by providing buffer storage capacity. You should take into account the: • nature of the pollutants • potential pathways		

• effects of downstream waste water treatment • sensitivity of the receiving environment		
If buffer storage capacity is required, you can only discharge from it after you have assessed the water for contamination, in order to identify an appropriate disposal route.		
You must implement spill contingency procedures to minimise the risk of an accidental spill entering watercourses or sewers or contaminating land.		
You must take account of additional firefighting water flows or firefighting foams, in accordance with our fire prevention guidance. You may need infrastructure like emergency storage lagoons to prevent contaminated firefighting water from reaching a receiving water body.		
You must consider and, if appropriate, plan for the possibility that you may need to contain or abate accidental emissions from: • overflows • tank failures • tank wall penetrations • site plant or machinery leaks		
Security Measures You must have security measures (including staff) to prevent unauthorised access to your facility so preventing: • damage to equipment • theft • illicit dumping and fly-tipping • arson	Yes	The site is manned 24 hours a day and any member of site staff or site security will raise the alarm as soon as they become aware of any incident.
Depending on your risk assessment, facilities must use an appropriate combination of		

• security guards • total enclosure (usually with fences) • controlled entry points • lighting • warning signs • 24-hour surveillance, such as CCTV		
Fire Prevention If your permit allows you to store or treat combustible waste, you must have a fire prevention plan that meets the requirements of our guidance.	Yes	The site has a dedicated Fire Prevention Plan which is provided within Annex D of the permit application.
Other Accident Prevention Measures You must maintain plant control in an emergency using one or a combination of the following measures: • alarms • trips and interlocks • automatic control systems • tank level readings such as ultrasonic gauges, high level warnings, process interlocks and process parameters	Yes	The site's accident and emergencies procedures are detailed within the Accident Management Plan. Preventative maintenance is conducted as part of the site's EMS.
You must: • make sure that all the measurement and control devices you would need in an emergency are easy to access and operate in an emergency situation • maintain plant in a good state through a preventive maintenance programme and a control and testing programme • use techniques such as suitable barriers to prevent moving vehicles damaging equipment		

• put procedures in place to avoid incidents due to poor communication between operating staff during shift changes and following maintenance or other engineering work • where relevant, use equipment and protective systems intended for use in potentially explosive atmospheres		
Record Keeping and Procedures You must: • keep an up to date record of all accidents, incidents, near misses, changes to procedures, abnormal events, and the findings of maintenance inspections • carry out investigations into accidents, incidents, near misses and abnormal events and record the steps taken to prevent their reoccurrence • maintain an inventory of substances which are present (or likely to be) and which could have environmental consequences if they escape	Yes	Any accidents or incidents will be recorded on site as part of the sites EMS. The Environment Agency will be notified following any event that may cause significant pollution.
You should notify the Environment Agency without delay if you detect any of the following events and they are causing, or may cause, significant pollution: • a malfunction • a breakdown or failure • an accident • emission of a substance not controlled by an emissions limit • breach of an emissions limit		
2.4 Contingency Plan and Procedures You must have and implement a contingency plan, which makes sure that you: • comply with all your permit conditions and operating procedures during maintenance or shutdown at your site or elsewhere	Yes	Contingency plans are in place as part of the site's EMS. The site will operate under strict compliance with the permit limits and conditions.

• do not exceed storage limits in your permit and you continue to apply appropriate measures for waste storage and handling • stop accepting waste unless you have a clearly defined method of recovery or disposal and enough permitted storage capacity		
You must have contingency procedures in place to make sure that, as far as possible, you know in advance about any planned shutdowns at waste management facilities where you send waste.		
You must make your customers aware of your contingency plan, and of the circumstances in which you would stop accepting waste from them.		
You must 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		
If you could exceed your permitted limits, or compromise you storage or handling procedures, you must not discount alternative disposal or recovery options on the basis of extra cost or geographical distance.		
You must not include unauthorised capacity in your contingency plan. If your contingency plan includes using temporary storage for additional waste on your site, then you must make sure your site is authorised for this storage and the appropriate infrastructure is in place.		
Contingency Measures for Treatment Only Your management procedures and contingency plan must: • identify known or predictable malfunctions associated with your technology and the procedures, spare parts, tools and expertise needed to deal with them		

• include a record of spare parts held - or state where you can get them from and how long it would take • have a defined procedure to identify, review and prioritise items of plant which need a preventative regime • include all equipment or plant whose failure could directly or indirectly lead to an impact on the environment or human health • make sure you have the spare parts, tools, and competent staff needed before you start maintenance		
If you produce an end-of-waste material, your contingency planning must consider storage capacity for end-of-waste products, and materials that fail the end-of-waste specification.		
Your management system must include procedures for auditing your performance against all of these contingency measures and for reporting the audit results to the site manager.		
2.5 Facility Decommissioning You must consider the decommissioning of the plant at the design stage and make suitable plans to minimise risks during later decommissioning.	Yes	The Hammer Mill will be decommissioned in accordance with the manufacturers recommendations to ensure any potential risks are minimised. All decommissioning will be undertaken in accordance with a detailed decommissioning plan and associated procedures.
For existing plants where potential problems are identified you must put in place a programme of design improvements. These designs improvements need to make sure that you: • avoid using underground tanks and pipework - if it is not economically possible to 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		
You must maintain a decommissioning plan to demonstrate that: • plant can be decommissioned without causing pollution • the site will be returned to a satisfactory condition		
You should identify non-productive or redundant items such as tanks, pipework, retaining walls, bunds, reusable waste containers, ducts, filters and security systems and implement a programme of decommissioning and removal.		
You should follow our guidance on how land and groundwater should be protected at permitted facilities. You should plan for producing a site condition report, if needed to surrender your permit.		
3.0 Waste Pre-acceptance, Acceptance and Tracking		
3.1 Waste pre-acceptance 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. If you accept the waste, you must keep records to justify your decision. Your procedures must follow a risk-based approach, considering: • the source and nature of the waste • potential risks to process safety, occupational safety and the environment • knowledge about the previous waste holder(s)	Yes	All incoming waste will be subject to pre-acceptance checks in accordance with the sites pre-acceptance procedure which meets the necessary requirements of the appropriate measures guidance.
Some facilities receive waste on an ad hoc basis. In those instances pre-acceptance checks can still be carried out before the waste is accepted. For example, through the exchange of information at the weighbridge before acceptance on site.		

When you receive a customer query, and before the waste arrives at your facility, you must obtain enough information from the waste producer to satisfy yourself that the waste has been properly assessed and classified in accordance with WM3.		
In the case of household and similar non-household waste (including skip waste) waste is pre-accepted by the terms and conditions of the contract in place (for example skip waste companies excluding fridges and freezers or hazardous wastes). There should also be a visual pre-acceptance check before removal from the producer's premises.		
For commercial and industrial waste you must get the following information in writing or electronic form: • details of the waste producer including their organisation name, address and contact details • a description of the waste • the waste's List of Wastes Regulations code (European Waste Classification code) • the source of the waste (the process that gives rise to the waste) • information on the nature and variability of the waste production process • information about the history of the donor site if it may be relevant to the classification of the waste (for example soils and other construction and demolition arisings from a site contaminated by previous industrial uses) • the waste's physical form • the waste's composition (based on representative samples if necessary) • a description of the waste's odour • the waste's age, that is when it first became waste • the type of packaging • whether the waste is mixed or segregated by List of Wastes code		

• an estimate of the quantity you expect to receive in each load and in a year		
For mirror entry LoW codes (as defined in WM3), you must keep the evidence that you have made an assessment of the waste to assign the relevant mirror entry code.		
You do not need to have sample information if the origin of the waste is reliably understood and it clearly shows that the waste is non-hazardous. However, a visual assessment alone will not be enough to assess whether mirror entry waste is hazardous or not.		
If the waste is a mirror entry and has not been properly assessed, you must assume it is the hazardous entry as a precautionary measure. This is likely to mean that you cannot accept it at your facility. You should verify the pre-acceptance information by contacting or visiting the producer. Dealing with staff directly involved in waste production can help to fully characterise a waste.		
Analysis of samples must be carried out by laboratories who are UKAS or MCERT accredited for the prescribed test		
After a waste has been properly assessed and classified, you must technically assess the waste's suitability for storage or treatment at your facility to make sure you can meet your permit conditions. You must make sure that the waste complies with your facility's treatment capabilities and you are permitted to take that waste.		
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 does not lead to receipt of the waste, you do not need to keep records.		
You must reassess the information required at pre acceptance if the:		

• waste changes • process giving rise to the waste changes • waste received does not to conform to the pre acceptance information In all cases you must reassess the information required at pre-acceptance on an annual basis.		
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, physical, chemical and odour-based parameters. You must also record the criteria for non-conformance or rejection. The person checking the waste for acceptance can also decide on their own additional parameters.		
3.2 Waste Acceptance You must implement waste acceptance procedures to check that the characteristics of the waste received matches the information you obtained during waste pre-acceptance. This is to confirm the waste is as expected and that you can accept it. If the waste does not conform to the pre-acceptance information, you may still be able to accept the waste, but you must confirm first that your permit allows it and that your facility can handle it appropriately. Otherwise, you must reject the waste.	Yes	All incoming waste will be subject to waste acceptance checks in accordance with the sites waste acceptance procedure which meets the necessary requirements of the appropriate measures guidance. The site will operate under strict compliance with the permit limits and conditions. No hazardous waste will be accepted on site.
Your procedures should follow a risk-based approach, considering: • the source, nature and age of the waste • potential risks to process safety, occupational safety and the environment • the potential for self-heating • knowledge about the previous waste holder(s)		
When deciding whether to accept waste, you must also check that the relevant storage areas (quarantine, reception and general) and treatment processes in your facility have the physical capacity needed to handle the waste. You must not accept		

waste if this capacity is not available, or if you would breach your permit by doing so.		
You must visually check wastes 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.		
You must check and validate all transfer documentation and resolve discrepancies before you accept the waste. If you believe the incoming waste classification or description is incorrect or incomplete, then you must address this with the original waste producer during waste acceptance. You must record any non-conformance. If you have assessed the waste as acceptable for on-site storage or treatment, you must document this.		
You must have clear criteria that you use to identify non-conforming wastes and wastes to be rejected. You must also have written procedures for recording, reporting and tracking non-conforming and rejected wastes. These must include: • using quarantine storage • notifying the relevant customer or waste producer • recording a summary of your justification for accepting non-conforming waste in your computerised waste tracking system You must take measures to prevent recurrence of non-conforming waste in your electronic system.		
Where you reject waste which has been classified as hazardous, you must follow the procedure set out in our rejected loads guidance.		
You must weigh each load of waste on arrival to confirm the quantities against the accompanying paperwork, unless alternative reliable and representative systems are available (for example, based upon density and volume). You must record the weight in your electronic or equivalent systems, so you can monitor available		

capacity at your facility. Records of incoming waste are not required for waste from householders deposited at Household Waste Recycling Facilities.		
The person carrying out waste acceptance checks must be trained to effectively identify and manage any non-conformances in the loads received, so you comply with your Duty of Care for waste and your permit conditions.		
Your procedures must make sure that your staff watch waste being unloaded from tipper lorries, so you can quarantine the waste if necessary before it is mixed with other material.		
Offloading, reception and quarantine areas must have an impermeable surface with self-contained drainage, to prevent any potentially polluting liquid from escaping off site. This requirement does not apply if your facility's permit allows only inert wastes and does not require impermeable surfacing with self-contained drainage.		
3.3 Quarantine Your facility must have a dedicated waste quarantine area which you use to temporarily store waste being rejected, or non-conforming waste whilst it is being assessed. Quarantine areas must have impermeable surface with self-contained drainage if there is a risk of contaminated runoff from the quarantined waste.	Yes	The site has a dedicated quarantine area which is in accordance with the appropriate measures.
Where there is a risk of fugitive emissions from quarantined waste you must store it in closed or covered containers or within a building.		
Quarantine storage must be separate from all other storage and clearly marked as a quarantine area.		

You should store the waste in quarantine in closed containers or cover it to prevent emissions if appropriate. For example, you should sheet quarantined soil or store it in a covered skip to prevent rainfall or wind from mobilising pollutants.		
You must have written procedures for dealing with wastes held in quarantine, including a maximum storage volume. The maximum storage time must take account of the potential for odour generation, pest infestation and storage conditions. If the waste is infested or odorous you must remove it within 24 hours or sooner.		
3.4 Waste Tracking You should use a computerised waste tracking system to hold up-to-date information about the available capacity of different parts of your facility, for example reception, quarantine, treatment and bulk storage. You must use a pre-booking system to make sure that you have enough waste storage and process capacity for the incoming acceptable waste.	Yes	The site will operate a computerised waste tracking system which will meet the requirements detailed within the appropriate measures. Waste will be recorded and tracked in accordance with the sites EMS.
Your computerised 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 readily accessible.		
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, including both wastes and end-of-waste materials produced at your facility. It must include this 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 or disposal process • identifying 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 • details of any non-conformances and rejections, including consignment notes for waste rejected because it is hazardous		
The computerised waste tracking system must be able to report for each of List of Wastes code: • the total quantity of waste present on site at any one time • a breakdown of the waste quantities you are storing 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 your management system and permit • the length of time the waste has been on site compared with the limits in your management system and permit		

The computerised waste tracking system must also be able to report the total quantity of end-of-waste materials on site at any one time, and where that material is located based on the site plan.		
You must store back-up copies of computer records off-site. These records must be readily accessible in an emergency.		
You must hold acceptance records for a minimum of 2 years after the waste has been treated or removed off site. You may have to keep records for longer if they are required for other purposes, for example hazardous waste consignment notes.		
4.0 Waste Storage		
You must have waste storage and handling procedures. You must store and handle waste in a way that makes sure you prevent and minimise pollution risks by using appropriate measures.	Yes	All waste will be handled and stored in accordance with the details provided within the permit variation document and in accordance with the sites the EMS to minimise pollution risk at all opportunities. Storage on site is limited to SRF in pellets, bales or pulverised form. All storage will take place in dedicated storage areas and will be managed in accordance with the sites Fire Prevention Plan, Dust Management Plan and Odour Management Plan. All storage will be carried out in accordance with the appropriate measures guidance.
You must store waste in locations that minimise the unnecessary handling of waste.		
Waste handling must be carried out by competent staff using appropriate equipment. You must use mechanical unloading technologies where it is possible, safe and practicable to do so.		
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 security protected area of your facility to prevent unauthorised access and vandalism.		
You must clearly document in your management system the maximum storage capacity of your facility and its designated storage areas. You must regularly monitor the quantity of stored waste against the allowed maximum capacities, and not exceed them. You must define capacity in terms of, for example:		

• cubic metres or tonnage • numbers of skips or other containers • maximum tank or vessel capacities		
You should clearly mark all waste storage areas and provide signs indicating the type of waste stored there.		
You must not accumulate wastes. You must treat wastes or remove them from the site as soon as possible. You must prioritise the treatment or off-site transfer of waste based on: • its type • its age on arrival • the date of arrival • the duration of storage on site		
Except for inert waste, you must follow the first-in-first-out principle, unless you need to prioritise more recently received wastes because they pose a higher risk of pollution.		
You must minimise refuse derived fuel (RDF) and solid recovered fuel (SRF) storage durations. You must implement an auditable bale identification system so that you can remove bales in date order.		
You must securely wrap bales of RDF and SRF with high-density polyethylene (HDPE) membrane or equivalent. This is to prevent water entering, access by pests and odour release. You should inspect bales regularly and rewrap any that are damaged. If they are wrapped securely, you can store them outside (unless your permit forbids this). If you store bales outside, your fire prevention plan must manage the risks from solar heating during hot weather.		

You must thoroughly clean storage bays and containers used for non-inert waste on a regular basis to prevent the build-up of aging waste, which will be a source of odour and attract vermin.		
All waste containers must be fit for purpose, that is: • in sound condition • not corroded, if metal • have well-fitting lids • suitable for the contents • with caps, valves and bungs in place and secure • within the manufacturer's designed lifespan, particularly for plastic containers		
You must inspect storage areas, containers and infrastructure regularly to make sure there is no loss of containment. You must deal with any issues immediately. You must keep written records of the inspections. You must rectify and log any spillages of waste.		
4.1 Segregation You should keep different types of waste segregated if contamination would inhibit r the recovery of the waste.	Yes	Storage on site is limited to SRF in pellets, bales or pulverised form. All storage will take place in dedicated storage areas and will be managed in accordance with the sites Fire Prevention Plan, Dust Management Plan and Odour Management Plan. All storage will be carried out in accordance with the appropriate measures guidance.
Where paper, plastic, metal or glass have been separately collected, they must not be mixed with other waste or material. This duty applies where keeping waste separate is required and to facilitate or improve recovery of the waste.		
5.0 Waste Treatment		

Waste treatment must have a clear and defined benefit. You must fully understand, monitor and optimise your waste treatment process to make sure that you treat waste effectively and efficiently. The treated output material must meet your expectations and be suitable for its intended disposal or recovery route. You must identify and characterise emissions from the process and take appropriate measures to control them at source.	Yes	All waste will be treated / stored on site prior to transfer off site for use as a fuel in energy from waste plants, cement kilns or similar.
You must prevent unwanted or unsuitable material from entering subsequent waste treatment processes.	Yes	Waste will be checked and sorted in accordance with the site's waste acceptance procedures.
You must have accurate and up-to-date written details of your treatment activities, and the abatement and control equipment you are using. You should include information about the characteristics of the waste to be treated and the waste treatment processes, including: • simplified process flow sheets that show the origin of the emissions • diagrams of the main plant items where they have environmental relevance, for example, storage, tanks, treatment and abatement plant design • details of physical processes for example separation, compaction, shredding, heating, cooling or washing • an equipment inventory, detailing plant type and design parameters, for example, time, temperature, pressure • waste types to be subjected to the process • the control system philosophy and how the control system incorporates environmental monitoring information • process flow diagrams (schematics) • the hourly processing capability of waste treatment equipment • a summary of operating and maintenance procedures	Yes	Waste treatment processing, output material and emission abatement is detailed within the Application Support Document. Control measures have been put in place to mitigate identified emissions and all storage will be managed in accordance with the following management plans: • Fire Prevention Plan; • Dust Management Plan; and • Odour Management Plan. Process flow diagrams have been produced detailing the proposed activities on site.

The extent of the information about your treatment activities will depend on the nature, scale and complexity of your facility and the range of environmental impacts it may have. It is also determined by the type and amount of wastes processed.		
You must have up-to-date written details of the measures you will take during abnormal operating conditions to make sure you continue to comply with permit conditions. Abnormal operating conditions include: • unexpected releases • start-up • momentary stoppages • shutdown	Yes	Abnormal operating conditions will be detailed within the sites EMS.
5.1 Soils and Inert Waste Soil and aggregate washing is a physico-chemical treatment (not a separation or sorting activity) and you must categorise the outputs as set out in WM3.	N/A	No soil or inert waste is stored on site.
5.2 Waste Treatment outputs, including fines You must not make assumptions about the nature of the outputs from your waste treatment processes. You must make sure that you appropriately classify the outputs following WM3. Failure to do so may breach your Duty of Care for waste and constitute an offence under the Environmental Protection Act 1990. This is particularly important for fines arising from shredding and trommelling processes, which generally: • require disposal at cost • contain a range of contaminants • are likely to be subject to a mirror entry code in the List of Wastes, for example 19 12 11* versus 19 12 12	Yes	Waste treatment outputs are limited to pulverised SRF material. The SRF pellets received on site are only delivered from the Subcoal Productions TSP Ltd (EPR/SP3005PX) material recycling facility in Teesside. WM3 assessments will be carried out if necessary.

Any hazardous waste taken from your facility must be consigned following our guidance Dispose of hazardous waste.	N/A	No hazardous waste is accepted on site.
If an output is not waste, for example because end-of-waste criteria have been met or the material has been produced in accordance with a Quality Protocol, then you do not need to store the output within your permitted area. However, non-waste materials are still able to cause pollution, for which you remain liable. You must implement appropriate measures to prevent and minimise risks of pollution from non-waste and waste materials.	N/A	Waste outputs have not met end-of-waste criteria.
5.3 Waste Treatment for Landfill If you are handling or treating waste before you send it to landfill follow our guidance Dispose of waste to landfill.	N/A	No waste will be sent to landfill. All waste will be treated / stored on site prior to transfer off site for use as a fuel in energy from waste plants, cement kilns or similar.
6.0 Emissions Control		
You must identify, characterise, control and monitor emissions from your activities that may cause pollution.	Yes	The main emission from the proposed Hammer Mill activity will be dust. However, this is mitigated through the use of a cyclone filtration unit. All identified emissions and mitigation measures are detailed with the permit application documentation, Environmental Risk Assessment and associated management plans.
6.1 Enclosure within Buildings Enclosing activities within buildings can be an appropriate measure for preventing and minimising emissions of pollution, given that an appropriately designed building will reduce a range of types of pollutants, in particular, noise, dust and odour. A partially enclosed building may be an appropriate measure on its own, or	Yes	All waste treatment activities and storage of loose waste is conducted within an enclosed building. Low emission risk material such as baled SRF is stored externally as currently permitted.

together with other appropriate measures, depending on the site-specific circumstances.		
If your waste treatment activities are likely to cause (or are causing) significant pollution at sensitive receptors which cannot be addressed by alternative measures, then you must carry out that waste treatment activity within an enclosed building.		
You must also carry out non-treatment activities, such as storing and transferring waste, including loading and unloading, in enclosed buildings if they produce significant emissions that you cannot effectively control by alternative measures.		
An enclosed building means a construction designed to provide sheltering cover and minimise emissions of noise, particulate matter, odour and litter. It must be enclosed on all sides. Its doorways must be as small as practical, and covered with fast-acting doors which default to the closed position. Its windows must be kept closed unless they are required for ventilation. Dirty air must pass through appropriate abatement before being emitted from the building.	Yes	The buildings on site are enclosed on all sides. The roller shutter doors within the Black Sand Shed which houses the Hammer Mill process will remain shut at all times apart from during the import and export of waste from the building.
Material transfer and storage systems and equipment (for example conveyors, hoppers, containers and tanks) can extend outside the building so long as they are also fully enclosed.	Yes	All waste treatment activities and storage of loose waste is conducted within an enclosed building. Low emission risk material such as baled SRF is stored externally as currently permitted.
You must regularly assess your building's integrity. You should consider using BS EN ISO 9972:2015 to demonstrate building containment. This method is based on fan pressurisation. You should carry out a smoke test at least annually.	Yes	Building integrity will be assessed when necessary, but regular inspections form part of the site's EMS.
Enclosed buildings must be ventilated to provide a safe working environment for employees. Your building's ventilation system must be properly designed and effective in order for the building to provide adequate containment and prevent	Yes	The buildings are ventilated to ensure a safe working environment.

fugitive emissions and noise breakthrough. The engineer designing the ventilation system must be appropriately qualified. In order to validate the size of supply points (louvers), and the volume of dirty air that needs to be extracted, the engineer must understand and consider: • the needs of the occupants working in the building • heat release • the volume of moist gas emissions that will be generated		
The air inside the building must be maintained under negative pressure, or you must install a localised extraction system that extracts dirty air from sources of pollution within the building. Sources that could potentially benefit from localised extraction include: • shredders and trommels • waste loading and unloading areas • odorous stockpiles	No	The building housing the Hammer Mill process is not maintained under negative pressure. However, the Hammer Mill activity has a dedicated cyclone filtration system to mitigate dust and is also installed within an enclosed building. The resultant pulverised material is stored within partially enclosed bunker to allow vehicle movements but prevent excessive dust emissions.
You must regularly assess the integrity of your building for damage that could result in fugitive emissions including noise breakthrough. You must prevent and minimise damage by implementing a maintenance programme.	Yes	Regular inspections form part of the site's EMS.
You must implement a policy controlling door opening, to make sure that the engineered ventilation system works as effectively as possible. It must direct emissions to the abatement system, rather than letting them escape as fugitive emissions through doors or windows. If you use negative pressure, it must be maintained when doors are opened, and you must monitor the pressure to demonstrate its effectiveness. Additional measures to minimise fugitive emissions may be required in some cases, for example installing an airlock entry system.	Yes	The roller shutter doors within the Black Sand Shed which houses the Hammer Mill process will remain shut at all times apart from during the import and export of waste from the building. This forms part of the Site's EMS.

To reduce emissions of noise and vibration, the building must have an appropriate minimum surface density. You must install acoustic seals on doors and windows, following advice from an acoustic specialist.	No	The building does not have acoustic seals however, as the permitted MRF is no longer operational and the Hammer Mill will only be operated within an enclosed building within a heavily industrialised area, there will be no increase in noise emissions as a result of the permit variation.
6.2 Point Source Emissions to Air (channelled emissions) You must use appropriate measures to make sure that you collect, extract and direct all process emissions to an appropriate abatement system for treatment before release.	Yes	The Hammer Mill activity has a dedicated cyclone filtration system which provides an appropriate abatement system for treatment prior to release within the building.
You must identify the main chemical constituents of your facility's point source emissions as part of your inventory of emissions to air. You must include the speciation of volatile organic compounds (VOCs) if you have identified them in the inventory and it is practicable to do so. You must characterise your emissions sufficiently to make sure that your chosen abatement systems are effective.	Yes	The site will maintain an inventory of emissions however there are no point source emissions to air as the Hammer Mill abatement system releases into the building.
You must make an assessment of the fate and impact of the substances emitted to air, following the Environment Agency's risk assessment guidance.	Yes	The application includes an Environmental Risk Assessment however there are no point source emissions to air as the Hammer Mill abatement system releases into the building.
To reduce point source emissions to air (for example dust and odorous compounds) from the treatment of waste, you must use an appropriate combination of abatement techniques. Or you must demonstrate to us that your	Yes	The Hammer Mill activity has a dedicated cyclone filtration system which provides an appropriate abatement system for treatment prior to release within the building.

alternative abatement is equally effective or better. The appropriate combination of abatement techniques would include one of more of the following: • adsorption • biofiltration, biotrickling or bioscrubbing • cyclone • fabric filter • water injection (into a shredder)		
You must assess and design vent and stack locations and heights to make sure dispersion capability is adequate and noise pollution is prevented. You may need to carry out dispersion modelling to establish whether the height of the vent or stack allows emissions to disperse appropriately, preventing any impacts on receptors.	Yes	The abatement system has been designed to ensure sufficient dispersion capability within the building.
Where monitoring is required, including for odour, you must install suitable monitoring points which meet the sampling standard for the relevant pollutants.	Yes	All monitoring will be carried out in accordance with the sites Dust Management Plan and Odour Management Plan.
You must have procedures to make sure that you correctly operate, monitor and maintain abatement equipment.	Yes	Planned preventative maintenance will be undertaken on all abatement equipment and in accordance with the manufacturers requirements.
Your monitoring should demonstrate the effectiveness of the abatement, so that you can take preventative or corrective action as necessary.	Yes	All monitoring will be carried out in accordance with the sites Dust Management Plan and Odour Management Plan.
You should implement contingency measures for abatement system down-time and for any abnormal events, for example biofilter media change. These should include suspending operations until the site is back under control, or having standby abatement available.	Yes	If the abatement system is not operational, the Hammer Mill also not be operational.

You should design and operate abatement systems to minimise water vapour plumes.	N/A	There will be no water vapour plumes.
6.3 Fugitive Emissions to Air You must use appropriate measures to prevent and minimise fugitive emissions to air, including dust, mud and litter, odour and noise and vibration.	Yes	All appropriate measures to prevent and minimise fugitive emissions are described with the application support document. The Environmental Risk Assessment addresses emissions to air including dust, mud, litter, odour and noise and vibration and any mitigation measures that are implemented on site.
You must use your waste pre-acceptance, waste acceptance and site inspection checks and procedures to identify and manage wastes that could cause, or are causing, fugitive emissions to air. When you identify any such wastes you must: • take appropriate risk-assessed measures to prevent and control emissions • prioritise their treatment or transfer	Yes	The site will operate in accordance with the sites waste acceptance procedures detailed within the EMS.
Where necessary to prevent fugitive emissions to air from the storage or handling of wastes, you should use a combination of the following measures: • store and handle the waste within an enclosed building • use fully enclosed material transfer and storage systems and equipment outside buildings, for example conveyors, hoppers, containers, tanks and skips • keep doors closed except when access is required • keep enclosed buildings and equipment under adequate negative pressure with an appropriate abated air circulation or extraction system, locating air extraction points close to potential emission sources • use fast-acting or 'airlock' doors that default to closed	Yes	All waste treatment activities and storage of loose waste is conducted within an enclosed building. Low emission risk material such as baled SRF is stored externally as currently permitted. The roller shutter doors within the Black Sand Shed which houses the Hammer Mill process will remain shut at all times apart from during the import and export of waste from the building.

You must have an appropriate, regular maintenance programme covering all buildings, plant and equipment. It must help prevent emissions or minimise them. Your maintenance programme must include: • a leak detection and repair programme to promptly identify and mitigate any fugitive emissions of organic compounds from treatment plant and associated infrastructure (for example, pipework, conveyors or tanks) • regular inspection and cleaning of all waste storage and treatment areas and equipment (including conveyor belts) to avoid large scale contamination activities • preventing plant and equipment from corroding (for example, conveyors or pipes) – including selecting and using appropriate construction materials, and lining or coating equipment with corrosion inhibitors	Yes	The site has a regular maintenance and inspection programme as part of the EMS.
You should monitor and log weather conditions – temperature, wind speed and direction, and describe any precipitation (for example none, drizzle, heavy rain, snow). You can use this information to identify when dispersion conditions are poor (that is, periods of warm, calm weather with wind blowing towards sensitive receptors). You can also use it to inform decisions to implement additional short-term pollution control contingency measures. You should carefully position your weather station, for example do not place it in between buildings. There is guidance in the World Meteorological Organization's Guide to Meteorological Instruments and Methods of Observation.	Yes	Weather conditions will be monitored and recorded as part of the sites EMS, Dust Management Plan and Odour Management Plan.
Relying on dispersion and wind direction to minimise pollution at sensitive receptors must be a last resort and you must not use it instead of measures that prevent and reduce pollution.	Yes	Dispersion and wind direction will not be relied on to minimise pollution on site.
Other Measures for Dust, Mud and Litter	Yes	

If your activities are likely to produce dust and particulates, mud or litter that could cause pollution at sensitive receptors, or if such pollution has been substantiated, you must implement and regularly review a dust, mud and litter management plan. You must do this following our guidance. Your dust, mud and litter management plan must explain how you will prevent and minimise emissions of dust, mud and litter from your facility.		The site has a dedicated Dust Management Plan implemented on site which includes the relevant appropriate measures guidance. Micro-netting and mist sprays are not considered necessary for site operations. The proposed mitigation measures, outlined in the Dust Management Plan are considered to be sufficient for this type of operation.
Measures such as litter fencing and micro-netting should be located as close as possible to areas where you load and unload light-weight loose waste, if this activity is done outdoors. You should not rely on fences and screens at the perimeter of your facility to stop litter escaping.		
Measures such as mist sprays should be located as close as possible to point source emissions of dust, for example at conveyors, trommels, shredders, and at building entrances – except where this would increase odour from biodegradable waste.		
If measures such as using hoses and road sweepers do not prevent mud escaping onto the public highway, you must take further measures and you must consider installing a high pressure wheel wash. Regardless of the measures you use, you must make sure that you minimise water consumption, and that contaminated water does not escape from your facility, unless you can lawfully discharge it.		
Other Measures for Odour If your activities are likely to produce odour pollution at sensitive receptors, or such pollution has been substantiated, you must implement and regularly review an odour management plan, following our guidance. This includes H4 Odour Management. Your odour management plan must explain how you will prevent and minimise odorous emissions from your facility.	Yes	The site has a dedicated Odour Management Plan implemented on site which includes the relevant appropriate measures guidance. No excessively odourous waste will be accepted on site in accordance with the sites waste pre-acceptance and acceptance procedures. Washing vehicles is not required due to the waste types proposed on site.
You must reject waste that is highly odorous as part of your pre-acceptance and waste acceptance procedures. This is unless you can handle and treat these wastes		

within an enclosed building, with appropriate odour control measures including extraction via odour abatement. Otherwise, you should liaise with the waste supplier to prevent recurrence. You should avoid receiving aged waste, for example by refusing to accept waste from other transfer stations that do not have strict inventory controls and documented holding times.		No odourous waters or liquids are kept on site.
You must make sure that odorous waste arrives at and leaves your facility in covered or enclosed vehicles. Mesh covers are not adequate to control odour. You should minimise how long potentially odorous waste is kept at your facility, in particular under anaerobic conditions. Making smaller stockpiles increases natural aeration, reducing the risk of anaerobic biodegradation which can cause odour.		
You should wash empty vehicles before they leave your facility, to remove any residues which may be or become odorous. You must make sure that the run-off from this process is contained and not directed to surface water sewer.		
You should not allow contaminated liquids to pool for prolonged periods, as they can be a source of odour. If you do not have a drainage system inside the building that can collect the leachate or dirty water, then you will need other appropriate measures. You should take action to avoid ponding or pooling. Industrial vacuum cleaners can be used to suck up liquids. You should clean any spillages immediately.		
You must cover odorous or potentially odorous waters or liquids or keep them in enclosed tanks or containers.		
Using masking agents (for example dry nano systems, ozone systems and ionisation systems) is a way of attempting to disguise an odour problem. If you understand and process wastes efficiently then you will not need to use masking agents. We do not consider this technology an appropriate measure.		
Other Measures for Noise and Vibration	No	

If your activities are likely to produce noise or vibration pollution at sensitive receptors, or such pollution has been substantiated, you must implement and regularly review a noise and vibration management plan, following our guidance H2 part 2 noise assessment and control. Your noise and vibration management plan must explain how you will prevent and minimise emissions of noise and vibration from your facility.		Site activities are not likely to produce pollution at sensitive receptors due to the site being located within an industrial area and the Hammer Mill treatment plant will be operated within an enclosed building. In the unlikely event excessive noise arises from site operations then the appropriate measures will be reviewed and a Noise Management Plan implemented.
For noise, your noise and vibration management plan must be informed by a Noise Impact Assessment carried out following the methodology of BS 4142:2014+A1:2019 'Methods for rating and assessing industrial and commercial sound'.		
For vibration, your noise and vibration management plan must be informed by a Vibration Impact Assessment carried out following the methodology of BS 6472-1:2008 'Guide to evaluation of human exposure to vibration in buildings. Vibration sources other than blasting'.		
6.4 Point Source Emissions to Water (including sewer) You must identify the main chemical constituents of your facility's point source emissions to water and sewer as part of your inventory of emissions.	Yes	The only emissions to surface water or sewer relate to clean surface water runoff. There will be no process emissions to water and sewer. No waste water treatment is required on site. The drainage system has been designed to ensure that any contaminated site water or fire water runoff is retained and only clean uncontaminated surface water is discharged from site.
You must assess the fate and impact of the substances emitted to water and sewer following the Environment Agency's risk assessment guidance.		
Discharges to water or sewer must comply with the conditions of an environmental permit and trade effluent consent.		
Relevant sources of waste water include: • runoff from all waste storage and handling areas, including loading and unloading areas • process water		

• condensate collected from treatment process • waste compactor runoff • vehicle washing • washing of containers and vessels • soil washing effluent • vehicle oil and fuel leaks • spills and leaks • rainwater from bunds around containers and tanks		
• If you need to treat waste water before discharge or disposal, you must use appropriate treatment techniques. An appropriate combination of treatment techniques, for example, could include silt or solids removal and using an oil separator to manage site drainage.		
You must segregate uncontaminated water streams (for example clean runoff from roofs) from those that require treatment.		
You must separate contaminated water streams based on pollutant content and treatment required. For example, you may need to collect and treat separately contaminated surface runoff water and process water.		
6.5 Fugitive Emissions to Land and Water You must use appropriate measures to control potential fugitive emissions and make sure that they do not cause pollution. See the guidance on emissions to water and leaks from containers.	Yes	The site has been designed to control potential fugitive emissions to land and water. All waste storage and treatment will take place on appropriately designed hardstanding with contained drainage that meets CIRIA guidance. Any tanks will be appropriately bunded and meet CIRIA guidance.
You must design appropriate surfacing and containment or drainage facilities for all operational areas, taking into account: • collection capacities • surface thicknesses		

• strength and reinforcement • falls • materials of construction • permeability • resistance to chemical attack • inspection and maintenance procedures • relevant standards of construction • end use, for example by tracked or wheeled vehicles or vehicle weight		The only subsurface infrastructure on site relates to the site drainage system which will be inspected and maintained as part of the sites maintenance and inspection programme. The site has a dedicated spillage procedure that will be implemented in the event of a spillage.
Your drainage infrastructure must: • prevent incompatible wastes coming into contact with each other • make sure that fire cannot spread		
You must store and treat all waste on an impermeable surface with contained drainage that meets CIRIA 736 or an equivalent approved standard. The impermeable surfaces must have sealed construction joints. These requirements do not apply in designated areas where the waste being stored or handled does not pose any significant risk of contaminating surface water or ground water. You must appropriately isolate these designated areas from other operational areas so that there cannot be any flows between them, including in the event of an accident, for example a fire.		
You must provide bunds for all tanks containing liquids (whether waste or otherwise) that could be harmful to the environment if spilled. Bunds must meet the CIRIA 736 standard and: • be impermeable, stable and resistant to the stored materials • have no outlet (that is, no drains or taps) and drain to a blind collection point		

• have pipework routed within bunded areas with no penetration of contained surfaces • be designed to catch leaks from tanks or fittings • have an appropriate capacity • have regular visual inspections - any contents must be pumped out or otherwise removed under manual control after checking for contamination • be fitted with a high level probe and an alarm (as appropriate) if not frequently inspected • have tanker connection points within the bund (where possible), and if not possible you must provide adequate containment for spillages or leakage • have programmed engineering inspections (extending to water testing if structural integrity is in doubt) • be emptied of rainwater regularly to maintain the containment capacity		
All above-ground tanks containing liquids (whether waste or otherwise) that could be harmful to the environment if spilled must be kept on an impermeable surface with contained drainage that meets CIRIA 736 or an equivalent approved standard. You must fit the tanks with alarms and cut-out systems to detect and prevent leaks and spills.		
You must minimise using subsurface equipment and infrastructure, and decommission it where possible. For subsurface structures, you must: • establish and record the routing of all site drains and subsurface pipework • identify all subsurface sumps and storage vessels • engineer systems to minimise leakages from pipes and make sure they can be detected quickly if they do occur		

• provide secondary containment or leakage detection for subsurface pipework, sumps and storage vessels – vessels must be fitted with alarms and cut-out systems to detect and prevent spills when filling • establish an inspection and maintenance programme for all subsurface structures, for example, pressure tests, leak tests, material thickness checks or CCTV		
You must provide secondary containment that meets CIRIA 736 or an equivalent approved standard, for all drums and other mobile containers which: • are greater than 200 litres in capacity and are kept outside • contain liquids (whether waste or otherwise) that could be harmful to the environment if spilled		
You must comply with the Oil Storage Regulations. These apply to non-hazardous wastes such as vegetable and cooking oil, as well as to biofuels and mineral oils.	Yes	The oil storage regulations will be complied with if required.
You must provide appropriate buffer storage capacity at your facility to store waste waters, taking into account: • potential abnormal operating scenarios and incidents • the nature of any polluting substances and their impact on the downstream waste-water treatment plant and receiving environment	Yes	The only waste waters stored on site will be in the event of a fire. All storage details for potential fire water is detailed within the sites Fire Prevention Plan.
You must have appropriate measures to monitor, treat and reuse the water held in the buffer storage before discharging.	No	The only waste waters stored on site will be in the event of a fire. All storage details for potential fire water is detailed within the sites Fire Prevention Plan. Due to fire water likely being contaminated, it will be contained and removed off site for disposal.

You must take appropriate measures to prevent emissions from washing and cleaning activities, including: • containing and directing spray, liquid effluent and wash-waters to foul sewer or collecting them in a sealed system for offsite disposal – you must not discharge them to surface or storm drains • where possible, using biodegradable and noncorrosive washing and cleaning products • storing all detergents, emulsifiers and other cleaning agents in suitable bunded or containment facilities, within a locked storage area, or in a building away from any surface water drains • preparing cleaning or disinfection solutions in contained areas of the site and never in areas that drain to the surface water system or groundwater	Yes	Washing and cleaning activities will be managed in accordance with the site's EMS and will be carried out in accordance with the appropriate measures.
You must produce and implement a spillage response plan and train staff to follow it and test it.	Yes	The site has a dedicated spillage response procedure in accordance with the guidance requirements. It will form part of the sites EMS. All site operatives will be trained on the spill response procedure. The site also has an inspection and maintenance programmes which will be utilised for all aspects of the site.
Your procedures and associated training must make sure you deal with spillages immediately. You should follow the manufacturer's health and safety advice for any products or substances involved.		
You must keep spill kits at locations close to areas where a spillage could occur and make sure relevant staff know how to use them. You must make sure kits are replenished after use.		
You must stop spillages from entering drains, channels, gullies, watercourses and unmade ground. You must make available proprietary sorbent materials, sand, booms or drain mats for use when required.		
You must make sure your spillage response plan includes information about how to recover, handle and correctly dispose of waste produced from a spillage.		

You must have a documented inspection and maintenance programme for impermeable surfaces and containment facilities, and keep records to demonstrate its implementation.		
6.6 Pests You must manage waste in a way that prevents pests. For example, if you do not manage flies, rats and birds they can affect operations, be a nuisance to neighbours and pose an environmental and health hazard as a potential vector for pathogens. Guidance on fly management is available.	Yes	Due to the proposed wastes stored and processed on site, pests are not likely to be a problem on site. The site is inspected weekly for the presence of pests which is recorded in the daily log should any activity be revealed. A Pest Management Plan is not considered necessary due to the proposed wastes accepted on site and site operations.
If you expect pests will cause pollution, hazard or annoyance at sensitive receptors, or if this has been substantiated, you must create, use and regularly review a pest management plan, following our guidance.		
Your pest management plan must include procedures for: • the inspection and control of pests • rejecting loads of infested waste • treating pest infestations promptly, and removing waste if necessary • storing, handling and using approved pest control products – you can get information on using chemicals at work from the Health and Safety Executive		
7.0 Emissions Monitoring and Limits		
7.1 Emissions to Air Your facility's emissions inventory must include information about the relevant characteristics of point source emissions to air, such as the: • average values and variability of flow and temperature • average and peak concentration and load values of relevant substances and their variability	Yes	An emissions inventory will be developed to monitor emissions to air from the process in accordance with the approved permit. However, there are no point source emissions to air as the Hammer Mill abatement system releases into the building. The only emissions from the Hammer Mill equipment will be dust which is abated via the cyclone filtration

• presence of other substances that may affect the waste gas treatment system or plant safety, for example, oxygen, nitrogen, water vapour, dust		abatement system. The abatement system has been designed to meet an emission limit of 5 mg/m^3 in line with BAT requirements.
You must monitor fugitive emissions of dust and particulates if they are likely to cause pollution at sensitive receptors, or if this has been substantiated. There is guidance on developing monitoring strategies for assessing levels of pollutants in the ambient atmosphere and monitoring particulate matter in ambient air around waste facilities.	Yes	The site will be operated in accordance with the Dust Management Plan which details any monitoring that will be carried out routinely on site.
You must describe your monitoring programme in your dust management plan. Visual monitoring is not effective for assessing the risk of emissions of fine particulates, for example PM10. You should use dust and particulate monitors with trigger alarms instead. You should set alarm trigger levels to alert site staff when short-term particulate concentrations are elevated, so that you can review site practices or increase your mitigation measures. When combined with weather data, dust and particulate monitors can also provide evidence to demonstrate that your facility is not the cause of complaints. You should use a particulate limit of 75 µg/m3 to100 µg/m3 (over a 5 minute average) for PM10 as an initial trigger for action, and reduce this after the system has been in place for some time.	Yes	The site will be operated in accordance with the Dust Management Plan which details any monitoring that will be carried out routinely on site. Due to the abatement system and containment of the Hammer Mill activities within a building, it is not likely that dust emission will be an issue on site. However, if once the site is operational this is not the case, a revised monitoring regime will be proposed.
7.2 Medium Combustion Directive If you operate medium combustion plant or specified generators you must monitor your emissions following the Environment Agency guidance on Monitoring stack emissions: low risk MCPs and specified generators and maintain a record of the type and quantity of fuel used in the plant.	N/A	Not Applicable for site operations. There is no medium combustion plant on site.

7.3 Emissions to Water and Sewer Your facility's emissions inventory must include information about the relevant characteristics of point source emissions to water or sewer, such as: • average values and variability of flow, pH, temperature, and conductivity • average concentration and load values of relevant substances and their variability, for example, Chemical Oxygen Demand (COD) and Total Organic Carbon (TOC), nitrogen species, phosphorus, metals, priority substances or micropollutants • data on bio-eliminability, for example, Biochemical Oxygen Demand (BOD), BOD to COD ratio, Zahn-Wellens test, biological inhibition potential (for example, inhibition of activated sludge)	Yes	The only permitted emission point is S1 for site surface water drainage only. This will be detailed within the sites EMS.
For relevant emissions to water or sewer identified by the emissions inventory, you must carry out monitoring of key process parameters (for example, waste water flow, pH, temperature, conductivity or BOD) at key locations. For example, these could either be at the: • inlet or outlet (or both) of the pre treatment • inlet to the final treatment • point where the emission leaves the facility boundary	N/A	Process parameters are not required to be monitored for clean surface water runoff.
8.0 Process Efficiency Appropriate Measures		
For your facility, you must monitor and review the annual quantity of: • water, energy and raw materials used • residues and waste water produced You must do this at least once every year.	Yes	All monitoring will be carried out in accordance with the permit requirements.
8.1 Energy Efficiency (installations only) You must create and implement an energy efficiency plan at your facility. This must:	Yes	

• define and calculate the specific energy consumption of the activity (or activities) you carry out 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		All required energy efficiency measures will be implemented and managed in accordance with the site's EMS.
You must regularly review and update your energy efficiency plan as part of your facility's EMS.		
You must have an energy balance record in place. This must provide a breakdown of your energy consumption and generation (including any exportation of energy or heat) by the type of source (electricity, gas, conventional 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.		
You must regularly review and update your energy balance record as part of your facility's EMS, alongside the energy efficiency plan.		
You must have operating, maintenance and housekeeping measures in place in the following areas, where relevant: • air conditioning, process refrigeration and cooling systems (leaks, seals, temperature control, evaporator/condenser maintenance) • operation of motors and drives • compressed gas systems (leaks, procedures for use) • steam distribution systems (leaks, traps, insulation) • space heating and hot-water systems • lubrication to avoid high-friction losses • boiler operation and maintenance, for example, optimising excess air • other maintenance relevant to the activities within the facility		

You must have measures in place to avoid gross energy inefficiencies. These should include for example: • insulation • containment methods (such as seals and self-closing doors) • avoiding unnecessary discharge of heated water or air (for example, by fitting simple control systems such as timers and sensors)		
You should implement additional energy efficiency measures at the facility as appropriate, following our guidance.		
8.2 Raw Materials (installations only) You must maintain a list of the raw materials used at your facility and their properties. This includes auxiliary materials and other substances that could have an environmental impact.	Yes	Any materials used on site will be recorded and a list maintained. Regular reviews will be undertaken for all raw materials in accordance with the site's EMS.
You must regularly review the availability of alternative raw materials and use any suitable ones that are less hazardous or polluting. This should include, where possible, substituting raw materials with waste or waste-derived products.		
You must justify the continued use of any substance for which there is a less hazardous alternative.		
You must have quality assurance procedures to control the content of raw materials.		
8.3 Water Use (installations only) You must take measures to make sure you optimise water consumption in order to: • reduce the volume of waste water generated • prevent or, where that is not practicable, reduce emissions to soil and water	Yes	There will be minimal water use on site. Water use will be monitored and recorded in accordance with the sites EMS and in accordance with the appropriate measures guidance.

Measures you must take include: • implementing a water saving plan (involving establishing water efficiency objectives, flow diagrams and water mass balances) • optimising the use of washing water (for example, dry cleaning instead of hosing down, using trigger control on all washing equipment) • recirculating and reusing water streams within the plant or facility, if necessary after treatment • reducing the use of water for vacuum generation (for example, using liquid ring pumps with high boiling point liquids) where relevant		Waste water is not generated by the proposed process on site.
You must carry out a regular review of water use (a water efficiency audit) at least every 4 years.		
You must also: • produce flow diagrams and water mass balances for your activities • establish water-efficiency objectives and identify constraints on reducing water use beyond a certain level (usually this will be site specific) • Identify the opportunities for maximising reuse and minimising use of water • have a time-tabled improvement plan for implementing additional water reduction measures		
To reduce emissions to water, you should apply these general principles in sequence: • use water-efficient techniques at source where possible • re-use water within the process, by treating it first if necessary. If this is not practicable, use it in another part of the process or facility that has a lower water-quality requirement		

• if you cannot use uncontaminated roof and surface water in the process, you should keep it separate from other discharge streams - at least until after you have treated the contaminated streams in an effluent treatment system and have carried out final monitoring		
You should establish the water-quality requirements associated with each activity and identify whether you can substitute water from recycled sources and, where you can, include it in your improvement plan.		
Where there is scope for reuse (possibly after some form of treatment) you should keep less contaminated water streams, such as cooling waters, separate from more contaminated streams.		
You must minimise the volume of water you use for cleaning and washing down by: • vacuuming, scraping or mopping in preference to hosing down • reusing wash water (or recycled water) where practicable • using trigger controls on all hoses, hand lances and washing equipment		
You must directly measure fresh water consumption and record it regularly at every significant usage point - ideally on a daily basis		
9.0 Waste Minimisation, Recovery and Disposal		
You must have and implement a residues management plan that: • minimises the generation of residues, that is solid waste arising from the treatment of waste • optimises the reuse, regeneration, recycling or energy recovery of residues, including packaging • makes sure you properly disposal of residues where recovery is technically or economically impractical	Yes	Minimal waste is produced by the proposed operations on site. All received waste will either be solely stored prior to export off site for re-use, or processed within the Hammer Mill and then exported off site for re-use.

Where you must dispose of waste, you must carry out a detailed assessment identifying the best environmental options for waste disposal.	Yes	All wastes will be monitored in accordance with the site's EMS.
You must review on a regular basis options for recovering and disposing of waste produced at the facility. You must do this as part of your management system to make sure that you are still using the best environmental options and promoting the recovery of waste where technically and economically viable.	Yes	