VARIATION APPLICATION

Document Reference: HEP-VAR-01	Issue Number: 2	Issue Date: 13.3.2023

Application to Vary Environmental Permit

HEP-VAR-01

Version 2

Hep Oils Limited
Weybeards Farm
Hill End Road
Harefield
Uxbridge
UB9 6LH

VARIATION APPLICATION

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1. INTRODUCTION

An application has been submitted to the Environment Agency to vary Environmental Permit BB3506MC. The original permit was issued to Mr Fred Heppelthwaite and Tim Heppelthwaite on 17 November 2008. This was transferred to Hep Oils Limited on 14 August 2014.

This application seeks to change the Environmental Permit boundary, add waste activities and change the permitted waste list. These are described in more detail in Chapter 2.

The current permit specifically allows the receipt, storage and treatment of waste cooking oil, (EWC 200125 edible oil and fat). The permit allows the operator to manage up to 25,000 tonnes per annum. There is no change to this throughput. Due to changes in the company operation, Hep Oils Limited will no longer handle this waste code. The company is to diversify into providing a small scale skip waste collection service.

An application to vary the permit was submitted to the Agency on 22 December 2021. On 21 February 2022, the Agency requested information regarding the Technical Competency for the site. This was provided to the Agency on the 24 February 2022.

On the 8 March 2023, the Agency requested a list of information required to duly make the application, including compliance with the guidance Non Hazardous and Inert Waste: Appropriate Measures for Permitting Facilities.

To provide context for the proposed operation, the site can meet the Standard Rules Permit SR2015 No6: 75kte household, commercial and industrial waste transfer station with treatment. The only exception to this, is the proximity to a Site of Special Scientific Interest (SSSI). The SSSI is Old Park Wood, it is designated for its differing woodland types. There are no other designations within 500m of the site.

This version has been updated to clarify the proposed wastes to be accepted and demonstrate compliance with the Appropriate Measures.

There are several agricultural buildings that will be used to receive, treat and store waste.

A Fire Prevention Plan has been provided to support the application.

The Environmental Management System (EMS) will be updated in EMS-OP-01 Operational Procedures. The EMS is outlined in this document.

2. PROPOSED CHANGES

2.1 Permit Boundary

The permit boundary will be increased to include more buildings for waste operations.

The proposed boundary is shown on Drawing HEP-WEY-EP-01.

2.2 Proposed Wastes

The following wastes will be accepted by the operator:

The main waste to be managed at the site will be EWC 17 09 04 mixed construction.

EWC Code	Description	Comments
15 01 01	Paper and Cardboard	Not routinely accepted. Any such waste would be placed in the designated container for off-site transfer.
15 01 02	Plastic packaging	Not routinely accepted. Any such waste would be placed in the designated container for off-site transfer.
15 01 03	Wooden packaging	Not routinely accepted. Any such waste would be placed in the designated container for off-site transfer.
15 01 04	Metallic packaging	Not routinely accepted. Any such waste would be placed in the designated container for off-site transfer.
15 01 05	Composite packaging	Not routinely accepted. Any such waste would be placed in the designated container for off-site transfer.
15 01 06	Mixed packaging	Not routinely accepted. Any such waste would be placed in the designated container for off-site transfer.
15 01 07	Glass packaging	Not routinely accepted. Any such waste would be placed in the designated container for off-site transfer.
15 01 09	Textile packaging	Not routinely accepted. Any such waste would be placed in the designated container for off-site transfer.
16 01 03	End of Life Tyres	Not routinely accepted. If tyres were encountered in a load, these would be separated and stored in a separate container. Empty containers/bins are stored on site.
17 01 01	Concrete	Waste would be typically transferred direct to a site that can process these wastes. Unlikely to
17 01 02	Bricks	

17 01 03	Tiles and ceramics	be received as a routine waste stream at the site.
17 01 07	Mixtures of concrete, bricks, tiles and ceramics other than those mentioned in 17 01 06	
17 02 01	Wood	These wastes are not likely to be accepted as single waste streams. There may be occasions when a project will require a separate container for some wastes. These codes would be used for those scenarios.
17 02 02	Glass	
17 02 03	Plastic	
17 04 01	Copper, bronze, brass	
17 04 02	Aluminium	
17 04 03	Lead	
17 04 04	Zinc	
17 04 05	Iron and Steel	
17 04 06	Tin	
17 04 07	Mixed metals	
17 04 11	Cables	
17 05 04	Soils and Stones	Waste would be typically transferred direct to a site that can process this waste. Unlikely to be received as a routine waste stream at the site.
17 08 02	Gypsum based construction materials	Wherever possible, this waste will be segregated at source.
17 09 04	Mixed construction and demolition wastes other than those mentioned in 170901, 170902 and 170903	This will be used for most of the waste arriving at the site. Skips containing a mixture of wood, metal, plastic (packaging, UPVC, rigid), glass and textiles (carpets, floor tiles).
19 12 01	Paper and cardboard	Not routinely accepted. This provides some flexibility if it provides an efficient service for transferring waste.
19 12 02	Ferrous metal	
19 12 03	Non ferrous metal	
19 12 04	Plastic and rubber	
19 12 05	Glass	
19 12 07	Wood	
19 12 08	Textiles	
19 12 09	Minerals	

19 12 10	Combustibles	
20 01 01	Paper and cardboard	Unlikely to be accepted as single waste stream. These wastes would be mixed with general waste and separated through the process.
20 01 02	Glass	
20 01 10	Clothes	
20 01 11	Textiles	
20 01 34	Batteries	Any batteries encountered would be removed for secured storage.
20 01 36	Discarded electrical items	Any WEEE encountered would be removed for storage.
20 01 38	Wood	Unlikely to be accepted as single waste stream. These wastes would be mixed with general waste and separated through the process.
20 01 39	Plastics	
20 01 40	Metals	
20 02 01	Biodegradable waste	This would include green waste.
20 02 02	Soil and stones	Waste would be typically transferred direct to a site that can process this waste. Unlikely to be received as a routine waste stream at the site.
20 02 03	Other non-biodegradable waste	
20 03 01	Mixed Municipal Waste – for example waste from office clearance and refurbishment	This could include general and refurbishment waste.
20 03 02	Waste from Markets	(this would not include food waste)
20 03 07	Bulky Waste	This would include collections from houses or businesses as whole items. For example, furniture. The furniture would be dismantled into component parts and stored as separate items for example wood and metal. Waste would be unloaded in reception area and separated into components and stored.

2.3 Waste Activities

The following waste activities will be required:

D15: Storage pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where it is produced)	Treatment consisting only of manual sorting, separation, screening, baling, shredding, crushing or compaction of waste into different components for disposal, (no more than 50 tonnes per day) or recovery. No more than a total of 50 tonnes of intact and shredded waste vehicle tyres (waste codes 16 01 03 and 19 12 04) shall be stored at the site.
R13: Storage of wastes pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced)	
D14: Repackaging prior to submission to any of the operations numbered D1 to 13	
D9: Physico-chemical treatment not specified elsewhere in Annex IIA which results in final compounds or mixtures which are discarded by means of any of the operations numbered D1 to D8 and D10 to D12	
R3: Recycling/reclamation of organic substances which are not used as solvents	
R4: Recycling/reclamation of metals and metal compounds	
R5: Recycling/reclamation of other inorganic materials	

2.4 Supporting Documents

The following documents are provided with the application:

EMS-OP-02	Noise Management Plan
EMS-OP-03	Dust Management Plan
EMS-OP-04	Odour Management Plan
EMS=FPP-01	Fire Prevention Plan
HEP-SCR-01	Site Condition Report
HEP-NTS-01	Non-Technical Summary

3. SUMMARY ENVIRONMENTAL MANAGEMENT SYSTEM AND OPERATIONS

Management System

3.1 The company will finalise its Environmental Management System (EMS) once the permit has been varied.

3.2 The EMS is summarised in this section. The EMS provides the operational procedures for the site including waste acceptance, processing, and storage. It follows the headings set out in Environment Agency Guidance – Develop A Management System: Environmental Permits.

3.3 Drawing No HEP-WEY-LAY-01 shows the site layout and key items of infrastructure. This shows the site surfacing, locations of buildings, and site entrance. Within the Environmental Risk Assessment, all key receptors have been identified on a separate plan.

3.4 Section 2.1 of the guidance sets out the requirements for the EMS. The EMS is provided in the Operating Procedures. Compliance with the appropriate measures is set out below.

Staff Competence

3.5 The overall operations will be overseen by a Technically Competent Manager (TCM). The TCM will oversee the day to day operations.

3.6 A copy of the COTC will be kept in the site office.

3.7 The Site Manager will be responsible for checking Duty of Care documentation, keeping and maintaining all records, checking in visitors, issuing Health & Safety instructions and dealing with any complaints. In addition to the TCM, there will be staff sorting the waste and drivers collecting the waste.

3.8 All site staff will be trained to ensure that the site operates without causing an impact to the environment. A Training Matrix has been prepared to identify the training needs for each position.

3.9 Any third party contractors will be required to report to the site office and sign the visitor's book. The TCM will provide a brief overview of the site rules.

3.10 This is a family run business. The site manager lives within the farm holding and will be available. Other members of the family live close by.

3.11 The site will not operate on a 24 hour basis.

3.12 This is compliant with Section 2.2.

Accident Management Plan

3.13 An Accident Management Plan has been prepared and is provided as a separate document, HEP-ERA-V1

Site Security

3.14 This is a remote site, located within the farm holding of the operator. Hill End Road is not a major through road. The Site Manager lives at the site.

3.15 The site has electronically activated lockable front gates, which are secured at the end of each working day. CCTV will be provided, and access provided through mobile phones.

3.16 The following security features will reduce fire risks, particularly from vandalism and operational risks:

- The site is secured by lockable gates.
- There is a second set of lockable gates at the entrance to the farm road.
- The site manager lives at the site.
- The site is located within the farm holding, which is remote.
- CCTV camera will monitor the building and site entrance.

3.17 All functions of security will be checked daily and information recorded on the Daily Checks Form.

Fire Prevention

3.18 A Fire Prevention Plan has been provided as a separate document.

Record Keeping

3.19 A Site Diary will be maintained to report any daily incidents or events that may have an impact on the environment. Such information will include:

- Start and finish of daily waste management activities on site
- Staff Attendance on site
- Technically competent management attendance on site
- Maintenance/Breakdowns
- Emergencies
- Problems with waste delivered and action taken
- Vandalism and other breaches in security
- Site inspections and consequent actions carried out by the operator
- Weather conditions
- Complaints about site operations and actions taken
- Environmental problems and remedial actions

3.20 The site diary will be kept in the site office and updated daily.

3.21 A record of the types, quantities and dates of wastes deposited on the site will be maintained and provided to the Environment Agency at quarterly intervals.

3.22 A record will be made of all incidents, accidents, near misses, abnormal events (weather) and maintenance. Any incident, accident of near misses will be investigated,

and a record of the action taken recorded. The Environment Agency will be notified any such events.

3.23 A copy of all records will be maintained in the site office.

3.24 This is compliant with Section 2.3.

Contingency Planning

3.25 The operator recognises that even with well planned maintenance, contingency plans must be in place in the event of a serious breakdown and to manage waste if primary outlets become unavailable.

3.26 To ensure all permitted waste quantities are adhered to and no amenity issues or increased fire risks are caused, before the operation commences the operator will ensure it has:

- Contacted relevant plant hire companies to source alternative equipment if required.
- Maintenance agreements in place for regular checks on all vehicles and plant.
- Prepared a list of primary sites that will take the waste.
- Prepared a list of alternative facilities to take the waste.
- Maintain spare parts on site. The operator has experience of mechanical repairs associated with the farm. Staff trained to carry out minor maintenance.

3.27 The alternative facilities will provide contingency capacity if the primary sites become unavailable.

3.28 This is compliant with Section 2.4 of the guidance.

Decommissioning

3.29 In the event that the operations cease at the site, the operator will proceed with an application to surrender the permit. This will require a Site Closure Plan to demonstrate that activities at the site have ceased and pose no risk to the environment.

3.30 The operation is quite straightforward and would not require detailed plant decommissioning. Depending on the proposed after-use of the site will determine whether the building needs to be dismantled.

3.31 This is compliant with section 2.5 of the guidance.

4. WASTE ACCEPTANCE

Waste Pre-Acceptance, acceptance and tracking

4.1 Prior to commencement, all customers will be notified about the waste acceptance procedures and will be provided a list of wastes that are not permitted at the site. The prohibitive list includes asbestos, fluorescent tubes, paint and aerosols, clinical and medical waste, oils, and hazardous waste.

4.2 If a customer requires mattresses, tyres and fridge freezers to be collected, separate arrangements are made for these items to be collected separately and taken to an appropriate facility.

4.3 The customer will be informed that the following wastes will be permitted, paper, cardboard, garden waste, wood, plastic, metal, hardcore, rubble, bricks, tiles and oils. Any plasterboard must be bagged and placed on the top of the skip.

4.4 The operator will request details about the nature of the waste to be collected.

4.5 At the point of collection, an initial visual inspection of the waste will be undertaken by the driver to check for conformance. This will ensure that only acceptable waste will be loaded on to the vehicle. Any of the prohibited items identified above will be removed at the customer's property.

4.6 On arrival at the site, the skip will be unsheeted once ready to discharge. The waste will be deposited in the reception area. The machine driver and site operatives will carry out a visual check and record any non-compliant waste.

4.7 All company drivers will be trained in waste acceptance procedures.

4.8 If non-compliant waste is present, the customer will be notified. The operator will manage the waste as per the non-compliant waste procedure.

4.9 All company drivers will be trained in waste acceptance procedures.

4.10 Duty of Care documentation will be completed. The waste data will be used to complete waste returns on a quarterly basis. A copy of the duty of care/transfer note will be stored in the site office and kept for two years.

4.11 This is compliant with Sections 3.1 and 3.2 of the guidance.

4.12 If waste arrives on site which is not acceptable under the EPR Permit:

a) The waste will not be deposited at the site;

b) The Site Manager will be informed;

c) The customer will be informed of the breach and charged for the additional handling costs associated with transferring to another authorised facility;

d) A Record is maintained of the non-permitted waste, quantity, source, date and client/source of waste.

If waste arrives on site which is tipped then non-permitted wastes are found:

a) The waste is immediately separated into the quarantine area pending off-site removal

b) Management Informed of non-permitted waste

c) The customer will be informed of the breach and charged for the additional handling costs associated with transferring to another authorised facility

d) Record maintained of non-permitted waste, quantity, source, date and client/source of waste.

4.13 If any asbestos is encountered, the asbestos will be double bagged and stored in a separator container. Arrangements will be made to transfer this to a specialist permitted facility.

A non-permitted form will be completed.

Quarantine

4.14 The site will have visual checks to minimise the incidents of receiving non-compliant waste.

4.15 Quarantined waste will be stored in a separate container which will be checked daily. If the wastes are problematic, i.e. odorous or infested with flies, arrangements will be made to remove the container within 24 hours, otherwise arrangements will be made to remove the container on a weekly basis. Any such problematic waste will either be bagged and placed in a container or placed in a lidded bin pending collection. The quarantine container will be inside the building.

4.16 This complies with section 3.3 of the guidance.

Waste Tracking

4.17 This is a small scale operation. The waste will be received and sorted daily. The process will work on removing older wastes first, on a first in – first out principle.

4.18 The daily checks will include a visual assessment of the quantity of waste held on site at the start of each day. This will enable the site manager to plan the operations to maintain storage capacity.

4.19 This is a small scale operation. Formal waste tracking using batches is not proportionate. Records of all waste received and removed from the site will be maintained by the operator.

4.20 This complies with section 3.4 of the guidance.

Storage

4.21 Waste will be sorted into the different containers as shown. The annual throughput will not exceed 25,000 tonnes per annum. Table 2 provides the storage limits.

Table 2 – Storage Limits – Waste Transfer Building

Waste Type	Storage	Storage Area	Max. Height	Max. Volume	Storage Time (Maximum)
Waste Sorting Area (reception)	Loose in central part of site for sorting*	4mx8m 32m^2	3m	20m^3	24-48 Hours
Residual (unrecyclable plastics, carpets)	Container	2.25m x 6.1m 14m^2	2.4m	30m^3	2 Weeks
Fines	Bay	3m x 4m 12m^2	1.8m	15m^3	1 week
Metal	Container	2.3m x 3.9m 9m^2	1.9m	17m^3	2 Weeks
Cardboard	Container	2.3m x 3.9m 9m^2	1.9m	17m^3	2 Weeks
Wood	Container	2.3m x 3.9m 9m^2	1.9m	17m^3	2 Weeks
Lightweight waste x2	Cage	3m x 3m 9m^2	1.9m	17m^3	1 Week
Plasterboard	Container	2.3m x 3.9m 9m^2	1.9m	17m^3	2 Weeks
Hardcore	Bay	3m x 4m 12m^2	4m	40m^3	2 Weeks

*The waste will be sorted as it is received. The maximum storage volume is based on a three skip loads returning at the end of the day.

** A spare container has been shown which could be used for storing specific items depending on a load. For example, UPVC. For the purposes of this FPP, it has been assumed that this spare container will store combustible waste.

The containers will be interchangeable. For the purposes of this assessment, they will be used to store combustible wastes, but there may be occasions, when two containers are required for metal for example. No more containers than shown above will be stored in the building.

Table 3 – Storage Limits for Dry Recyclables

Waste Type	Storage	Storage Area	Max. Height	Max. Volume	Storage Time (Maximum)
Cardboard	Container	2.3m x 3.9m 9m^2	1.9m	17m^3	2 Weeks
Cardboard	Container	2.3m x 3.9m 9m^2	1.9m	17m^3	2 Weeks
Bales	Loose	2m x 4m 8m^2	4m	20m^3	2 Weeks
Bales	Loose	2m x 4m 8m^2	4m	20m^3	2 Weeks

Note: The materials may be interchangeable, rotated on a weekly basis. For the purposes of this assessment, they will be used to store combustible wastes. For example, the baler

may be used for cardboard one week, and plastic for the second week. Whilst the maximum height of the bales may be 4m, only 20 bales can be stored in each pile.

4.22 The waste volumes will be checked daily. Once a container is at 75% full, the Site Manager will start to arrange to have the container removed from the site. A replacement container will be provided immediately at the changeover to ensure that the sorting process can continue.

4.23 This is a small scale waste sorting and separation facility, designed to process waste to avoid double handling.

4.24 The storage will be within two defined buildings, within the farm holding. The site has security measures to prevent unauthorised access to the storage areas.

4.25 The treatment of waste will be on a continuous basis, ensuring that the older waste is treated first. The separated wastes will also be removed from the site on a first in – first out principle.

4.26 The waste storage areas will be cleaned regularly, with a full site clean once a week.

4.27 All staff will be trained to ensure that the waste is being stored in the correct container.

4.28 Storage containers will be checked daily. The operator has a stock of containers to ensure that any damaged containers are removed from the operation and replaced to maintain capacity. Any damaged containers will be repaired or replaced.

4.29 All inspections will be recorded as part of the daily checks.

4.30 This complies with Section 4 of the guidance.

Waste Treatment

4.31 The purpose of waste treatment is to separate the different types of waste for recycling purposes, and reduce the amount of waste sent to landfill. The operation complies with the waste hierarchy, moving the management of waste from landfill through to recovery and recycling.

4.32 For the mixed waste, this will be sorted manually and mechanically. The machine operator will mechanically separate the large items and place in the different containers. Manual sorting will also be used to separate waste materials.

4.33 Any plasterboard will be removed from the mixed load to prevent this entering the trommel screen.

4.34 It is proposed to operate the following plant:

- Loading shovel
- Excavator
- Fork lift
- Trommel Screen

4.35 The remaining waste will be passed through a small trommel to remove the fine content. The fines will be tested in accordance with a sampling plan to ensure that the fines are classified with the correct EWC. (Section 5.2).

4.36 There will be no soil or aggregate washing on the site (Section 5.1).

4.37 Any waste sent to landfill will have been through a pre-treatment process to remove any recyclables. (Section 5.3).

4.38 All staff will be trained in the operational plant and equipment. Only trained staff will be permitted to use the plant and machinery.

4.39 All plant and machinery will be operated in accordance with manufacturer's specifications and subject to routine planned maintenance.

4.40 All site based plant will be checked daily before use. A defect form will be provided for each mobile plant and the operator must complete the form before commencing work. Any defects will be reported to the Site Manager for corrective action.

5. EMISSIONS CONTROL

5.1 Section 6 of the guidance relates to emissions control.

Enclosure within Buildings

5.2 Section 6.1 confirms that enclosing activities within buildings can be an appropriate measure for preventing and minimising emissions of pollution.

5.3 All waste will be received, stored and transferred inside a building, which complies with the appropriate measures for this activity.

5.4 This building is open on two sides. The guidance allows partially enclosed buildings as appropriate, depending on site specific circumstances.

5.5 A second building to be used for storing / baling dry recyclables is fully enclosed with roller shutter doors.

5.6 This will be a small scale facility for manage waste collected by the operator. The waste will be unloaded inside the building and sorted. The site is remote from sensitive receptors.

5.7 An enclosed building is defined as a means of construction designed to provide sheltering cover and minimise emissions of noise, particulate matter, odour and litter. The buildings to be used at this site will both provide cover and prevent emissions. The buildings are designed to be proportionate to the scale. The movement of waste is carried out using machines.

5.8 Staff do not work permanently inside the buildings, other than in machines. Building A is open on two sides and therefore an extraction system is not required. Building B will only be used periodically for baling dry recyclables. An extraction system is not required for this building.

5.9 The building is checked daily as part of the EMS.

Point Source Emissions to Air

5.10 There are no point source emissions to air.

Fugitive Emissions to Air

5.11 A risk assessment has been prepared to assess the risk of the operations such as dust, mud, litter, odour, noise and vibration.

5.12 Section 6.3 requires appropriate measures to prevent and minimise fugitive emissions to air. These are discussed below.

5.13 In general terms, the operator will use the waste acceptance, and inspection checks to identify and manage waste that could cause emissions to air. However, with reference to the risk assessment, the site will mainly manage waste collected in skips. This will include a mixture of wood, metal, textiles cardboard and plastics.

5.14 The waste will be received and sorted inside a building. This will be a small scale operation, where the waste will be unloaded and sorted daily.

5.15 The site infrastructure will be subject to daily checks and routine maintenance.

5.16 Weather conditions will be monitored and recorded daily. The site manager will check the forecast at the start of each week and prepare the site accordingly. The site manager will record the weather conditions daily in the site diary. This will include conditions (rain, dry, windy) etc.

5.17 Whilst the risk assessment demonstrates a low risk associated with dust, a Dust Management Plan has been prepared.

Mud and Dust

5.18 The site does not solely manage waste that could give rise to mud or dust. Any loads that contain soils only would be transferred directly to an appropriate site.

Litter

5.19 Litter could be generated during waste transfer and treatment. All waste deliver vehicles will be sheeted on arrival and prior to leaving the site.

5.20 Waste processing will take place in a building.

5.21 Litter picking will be carried out daily.

Odour

5.22 The guidance states "*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, which includes H4 Odour management. Your odour management plan must explain how you will prevent and minimise odorous emissions from your facility."*

5.23 The waste to be received will predominantly be skip waste, which is a mixture of cardboard, plastics, metal, wood and textiles. These wastes are not typically odour.

5.24 Any odorous waste would be segregated and removed from the site.

5.25 The risk assessment has confirmed that there is no pollutant linkage for odour. There is a low likelihood of odour being generated and there are no nearby sensitive receptors.

5.26 Whilst the risk assessment demonstrates a low risk associated with odour, an Odour Management Plan has been prepared.

Noise

5.27 The guidance states "*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.*

5.28 The site has been used for commercial activities for many years. Originally a cattle / pig farm. The owners diversified to treating waste cooking oil and continued this operation for many years. No noise complaints were received regarding this waste operation.

5.29 A Noise Management Plan and Noise Impact Assessment have been prepared.

5.30 The context of the assessments allows for the historic and current permitted activities for the site. This has always been an operational farm / yard with vehicle movements and on-site activities. The proposed waste use will be a small scale operation dealing with the operators own waste collection vehicles.

Point Source Emissions to Water (including sewer)

5.31 The operation will provide sealed drainage, there will be no point source emissions to water.

5.32 The waste operations will take place in a building, which provides a cover to prevent rainwater ingress. Any water will be contained and transferred off-site for treatment.

5.33 Fuels and oils will be stored in accordance with the Storage of Oils Regulations. The site will not accept liquid waste.

Fugitive Emissions to Land and Water

5.34 The waste operations take place in a building with a concrete floor. There will be no fugitive emissions to land or water.

5.35 The concrete is checked daily in accordance with the EMS.

Pests

5.36 All waste will be received, stored and transferred inside a building.

5.37 A pest control contractor will be deployed if required.

5.38 As there are no point source emissions to air or water, Section 7 of the guidance is not applicable.

5.39 Section 8 of the guidance relates to installations only and is not applicable.

6. WASTE MINIMISATION, RECOVERY AND DISPOSAL

6.1 The site operations have been designed to maximum the amount of waste separated for recycling, and to reduce the amount of waste sent to landfill.

6.2 This will be continuously reviewed as part of the EMS.

6.3 This complies with section 9 of the guidance.