



Operating Techniques and Waste Acceptance Procedures

High View Farm Waste Transfer Station Environmental Permit Application

West London Composting Limited

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1.0 INTRODUCTION

West London Composting Limited (WLC) has retained SLR Consulting Limited (SLR) to prepare a bespoke Environmental Permit (EP) variation application for the proposed Waste Transfer Station (WTS) located at High View Farm, New Years Green Lane, Harefield, Middlesex, UB9 6LX, hereafter referred to as the 'Site'. The facility already operates under an existing Waste Management Licence (WML) (No. GTL GRU017) operated by WLC.

This Operating Techniques (OT) and Waste Acceptance Procedure (WAP) document sets out best practice for operating the Site, based on legislation and best available techniques in the industry. In addition, the document details the WAP to be followed at the Site to ensure that the facility only accepts waste that is suitable for the activity, allowed by the EP, and appropriately considered by the Environmental Risk Assessment (ERA).

The OT and WAP has been drafted to ensure compliance with the following EA guidance:

- 'Develop a Management System: Environmental Permits', last updated April 2023,
- 'Non-Hazardous and Inert Waste: Appropriate Measures for Permitted Facilities²' updated August 2023; and
- 'Healthcare Waste: Appropriate Measures for Permitted Facilities'³, guidance updated December 2021.

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

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

This OT document is supplemented by the following documents submitted as part of EP variation application:

- Application Forms (Parts A, C2, C4, and F1);
- Non-Technical Summary (NTS);
- Environmental (Amenity) Risk Assessment (ERA);
- Fire Prevention Plan (FPP):
- Dust and Emissions Management Plan (DMP);
- Noise Management Plan (NMP);
- Odour Management Plan (OMP);
- Site Condition Report (SCR); and

³ Healthcare waste: appropriate measures for permitted facilities - Guidance - GOV.UK (www.gov.uk)



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¹ Develop a management system: environmental permits - GOV.UK (www.gov.uk)

² Non-hazardous and inert waste: appropriate measures for permitted facilities - Guidance - GOV.UK (www.gov.uk)

Associated drawings.

WLC is fully conversant with its environmental responsibilities in relation to the Site and is committed to ensuring that its relevant facilities are designed, constructed and operated to the highest possible standards. It is intended that this will be clear from the detail contained within this OT and WAP.

1.1 Site Location

The Site is located on High View Farm, Middlesex, UB9 6LX centred on National Grid Reference (NGR) TQ 07093 88015. The town of Ruislip is located approximately 2.5km south-east of the Site.

The area surrounding the Site comprises predominantly agricultural / open land and commercial / industrial premises. Grand Union Canal is located approximately 2km west of the Site at its closest point. There are several designated ecological habitats within 2km of the Site, including several ancient woodlands and a SSSI.

The Site will be accessed via a track leading to Newyears Green Lane which is located north of the EP boundary.

The Site's location is illustrated on Drawing 001, and the EP Boundary and Site Layout are illustrated in Drawing 002. Local receptors within a 500m radius of the Site are shown on Drawing 003.

Table 1-1 below summarises the surrounding land uses.

Table 1-1: Surrounding Land Uses

Boundary	Description
North	Adjacent to the north are industrial premises within the same industrial complex as the Site.
East	Immediately to the east lies industrial premises. The land beyond this predominantly comprises open / agricultural land.
South	Open / agricultural land lies immediately south of the Site.
West	Immediately to the east lies industrial premises within the same industrial complex as the Site.

1.2 Report Structure

This report describes the operating techniques that will be implemented at the facility to ensure compliance with the conditions of the EP. The report is divided into the following sections:

- Section 1 Introduction
- Section 2 General management and appropriate measures
- Section 3 Accident Prevention and Management Plan
- Section 4 Operations
- Section 5 Waste pre-acceptance, acceptance and tracking
- Section 6 Waste storage
- Section 7 Waste treatment
- Section 8 Emissions control



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- Section 9 Emissions monitoring and limits
- Section 10 Waste minimisation, recovery and disposal
- **Section 11** Healthcare appropriate measures
- Section 12 Information

1.3 Document Revision

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

Table 1-2: Revision History

Version	Reason for Revision	Date of Revision	Signature of Site Manager
V1	Original document for variation application and site development 2025		



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2.0 GENERAL MANAGEMENT APPROPRIATE MEASURES

2.1 Management System

The Site will be operated in accordance with WLC's ISO 140001 management system and this site specific OT and WAP document which will ensure that:

- The risks that the activities pose to the environment are identified;
- The measures that are required to minimise the risks are identified;
- The activities are managed in accordance with the management system and OT and WAP document;
- Performance against the management system is audited at regular intervals; and
- The EP is complied with.

The management system will be supplemented by this document which outlines the proposed OT and WAP at the Site and demonstrates conformance with the requirements of relevant published EA Guidance.

2.2 Management Structure and Responsibilities

The Site Manager, working in conjunction with WLC's Compliance Team located at the Site will be responsible for day-to-day operations and compliance with the EP.

Whenever the Site is open to receive or dispatch waste, or carry out any of the waste management operations, it will be supervised by at least one member of staff who is suitably trained and fully conversant with the requirements of the EP relating to:

- Waste acceptance and control procedures;
- · Operational controls;
- Maintenance;
- Record-keeping;
- Emergency action plans; and
- Notifications to the EA.

2.3 Technical Competence and Training

The Site will be managed by sufficient staff, competent to operate the Site. The management system will ensure the following:

- All staff will have clearly defined roles and responsibilities;
- Records will be maintained of the skills required for each post;
- Records will be maintained of the training and relevant qualifications undertaken by staff to meet the requirement of each post; and
- Operations will be governed by standard operating instructions.

Operations at the Site will be under the overall control of a technically competent person who holds the relevant Certificate of Technical Competence (COTC) under the Waste Management Industry Training and Advisory Board (WAMITAB) scheme or at such times as the company receives accreditation that they have a confirming and suitable competence management system (CMS) this method of proving competence shall be adopted.



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An assessment of staff training needs will be carried out to identify the posts for which specific environmental awareness training is needed, and to determine the scope and level of such training. The assessment of training needs will be reviewed on an annual basis.

The training programme will ensure that relevant staff are aware of the following:

- Regulatory implications of the EP for the Site and their specific work activity;
- All potential environmental effects from operations under normal and abnormal circumstances:
- The need to report deviations from the permit; and
- Prevention of accidental emissions and the action to be taken should accidental emissions occur.

A copy of this OT and WAP and the varied EP will be made available at the facility for the attention of all staff. They will be informed of the importance of these documents and the key areas of concern, and fully briefed on the role of the EA in enforcing compliance.

2.4 **Site Security**

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

- The Site will be manned during operational hours by Site staff who will undertake regular inspections:
- An internal and external CCTV monitoring system which can be monitored remotely;
- A 2.4m high enclosed fence with gated entrances to prevent access of nonauthorised personnel.

All visitors to the Site (other than those delivering waste) will be required to report to the Site office on arrival and to sign the visitor's book.

The Site will be visually inspected by Site operatives at the commencement of each working day. Any defects or damage which compromises the integrity of the enclosures will be made secure by temporary repair by the end of the working day. Permanent repairs will be affected as soon as practicable.

All inspections, any defects, damage or repairs will be recorded in the site electronic management system. Weekly checks which are developed for managers and supervisors shall be undertaken using electronic means. Actions form these checks is uploaded to the electronic system and reviewed each week by the senior management who allocatee resource and priority into fixing them.

2.5 Display of EP

A copy of the EP will be kept available for reference by all staff and contractors whose work may have an impact on the environment.

2.6 **Facility Decommissioning**

The Site will require a simple decommissioning consisting of the mechanical and electrical removal of all plant and equipment and the deconstruction of the fire walls. There will be no subsurface tanks or pipework, drains or potentially dusty insulation to remove.

The decommissioning plan will demonstrate that:

The plant can be decommissioned without causing pollution; and



The Site will be returned to a satisfactory state.

2.6.1 Permit Surrender

A SCR has been prepared in support of the EP application. The SCR sets out the baseline conditions of the Site for comparison at the point of EP surrender.

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

2.7 Managing Documentation and Records

Controls will be in place to ensure that all documents are issued, revised and maintained in a consistent fashion.

The documents that will be in the scope of controls are as follows:

- Policies:
- Responsibilities;
- Targets;
- Maintenance records;
- Procedures;
- · Monitoring records;
- Results of audits:
- Results of reviews;
- · Complaints and incident records; and
- Training records.

Records will be made and kept up to date on a daily basis to reflect deliveries, on-Site storage and dispatches. All records relating to waste acceptance will be maintained and kept readily available on Site and kept for a minimum of 2 years and will be made available for inspection by the EA at all reasonable times.

2.8 Reporting Non-Compliance and Taking Corrective Action

Procedures will ensure appropriate corrective action is taken in response to problems identified at the Site. The procedures will ensure that non-conformances are reported, investigated and rectified, and that failures and weaknesses are prevented. The following aspects will be considered:

- Actual or potential non-compliance;
- System failure discovered at internal audit;
- Suppliers or subcontractors breaking the agreed operating rules;
- Incidents, accidents, and emergencies;
- Other operational system failure; and
- Complaints.

The action taken in response to the non-conformance may include:

Obtaining additional information on the nature and extent of the non-conformance;



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- Discussing and testing alternative solutions;
- Modifying procedures and responsibilities;
- · Seeking approval for additional resources and training; and
- Contacting suppliers and contractors (as applicable).

2.9 Auditing and Legal Compliance

There will be a formalised internal auditing procedure to ensure the facility is audited at defined intervals and that the progress of corrective and preventative action is monitored.

2.10 Monitoring, Measuring and Reviewing Environmental Performance

A formalised management structure will review environmental performance, and ensure any necessary actions are taken.

2.11 Operational Control, Preventative Maintenance and Calibration

The management system contains operational procedures that will ensure effective control of Site operations, the use of approved suppliers, and contract services, the maintenance of operational equipment and calibration of monitoring equipment.

All plant and equipment will be subject to a programme of planned preventative maintenance which will follow the inspection and maintenance schedule recommended by the manufacturer.

2.12 Design and Construction Quality Assurance

All relevant elements of the Site will be designed in accordance with recognised standards, methodologies and practices.

The design process will use a risk-based approach and will be appropriately documented using drawings, specifications and method statements to provide an adequate audit trail.

A competent and suitably qualified person will supervise the construction activities and prepare a validation report confirming that the key construction activities have been carried out in accordance with recognised standards, methodologies and practices.



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3.0 ACCIDENT PREVENTION AND MANAGEMENT PLAN

WLC recognises the importance of the prevention of accidents that may have environmental consequences and that it is crucial to limit those consequences.

An accident management plan (AMP) will be implemented and maintained at the Site to ensure that the Site and staff are fully prepared for any such incidents. The AMP will be reviewed at least every four years or as soon as practicable after an incident, with changes made accordingly to minimise the risk of occurrence.

The Site Manager will be responsible for managing accidents on Site and ensuring the plan is understood by all Site operatives.

Up to date records of all accidents, incidents, near misses, changes to procedures, abnormal events and findings of maintenance inspections will be kept within the Site diary.

The EA will be notified upon detection of any of the events detailed in Section 3.1.

The following accident management plan describes the techniques that will be implemented to minimise the risks posed to the environment. Activities affecting the health and safety (H&S) of operatives, contractors and visitors will be separately managed in compliance with H&S regulation and company H&S Policy.

3.1 Hazard Identification

The following potential hazards have been identified in the ERA that was prepared using the ERA methodology and has been submitted in support of this EP application (ref. 402.065523.00001_ERA):

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

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

3.1.1 Unauthorised Waste

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

3.1.2 Fire

The Site will operate under an agreed FPP, prepared for this EP variation application. A copy of the FPP will be available on Site at all times.

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

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⁴ Fire prevention plans: environmental permits - GOV.UK (www.gov.uk)

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

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

3.1.3 Loss of Containment

Loss of containment could lead to spillage and leakage of potentially contaminating liquids. To prevent loss of containment and minimise the risk and impact of releases the following measures will be implemented:

- Containment system: any facilities for the storage of oils, fuels or chemicals will be sited above ground on impervious bases and surrounded by impervious bund walls.
 The volume of the bunded compound will be at least the equivalent to the capacity of the tank plus 10%. All filling points, vents and gauges will be located within the bund;
- Storage vessels: storage tanks will be constructed to the appropriate British Standard:
- Inspection: tanks will be inspected visually on a daily basis by the Site staff to ensure the continued integrity of the tanks, and identify the requirement for any remedial action:
- Spill kits: materials suitable for absorbing and containing minor spillages will be maintained on Site; and
- Monitoring techniques: the Site staff will undertake daily monitoring for evidence of spillage and leakage.

In the event of any potentially polluting leak or spillage occurring on Site, the following action will be taken:

- Minor spillages will be cleaned up immediately, using sand or proprietary absorbent.
 The resultant materials will be placed into containers and will then be removed from
 site and disposed of at a suitably permitted facility. The incident will be logged in the
 site diary.
- Any dry wastes spilled on Site will be collected and transported to the appropriate area of the site.
- In the event of a major spillage, which is causing or is likely to cause polluting
 emissions to the environment, immediate action will be taken to contain the spillage
 and prevent liquid from flowing outside the EP boundary. The spillage will be cleared
 immediately and placed in containers for offsite disposal, and the EA will be
 informed.

3.1.4 Security and Vandalism

In order to prevent unauthorised access, a number of Site security measures will be in place, including the following:

- Site perimeter: the Site benefits from 2.4m high enclosed fence with gated entrances around the perimeter;
- CCTV: an internal and external CCTV monitoring system will cover the full extent of the site, and will be able to be monitored remotely;



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- Inspection: gates and fencing extending around the Site will be inspected daily by the operations staff to identify deterioration and damage, and the need for any repairs;
- Maintenance and repair: fencing will be maintained and repaired to ensure their continued integrity. In the event that damage is sustained repairs will be made by the end of the working day. If this is not possible, suitable measures will be taken to prevent any unauthorised access to the site and permanent repairs will be affected as soon as practicable;
- Authorised access system: all visitors to the Site will be required to register in the visitor's book and sign out again on exit to minimise the risk of unauthorised visitors being present on Site; and
- Monitoring techniques: operational procedures, including regular inspections will
 ensure continual monitoring of security provision at the Ste. The Site will be manned
 throughout operational hours by Site staff.

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

3.1.5 Flooding

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

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

3.2 Contingency Plans and Procedures

The Site will implement a contingency plan to ensure that the following are achieved:

- Compliance with all EP conditions and operating procedures during maintenance or shutdown at the Site, including disruption at other facilities that would affect supplies to the site or the removal of waste from it;
- No exceedance of limits in the EP and that appropriate measures for storing and handling waste are continued to be applied; and
- Cessation of waste acceptance unless there is a clearly defined method of recovery and enough permitted capacity on Site.



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4.0 OPERATIONS

The Site will accept up to 75,000 tonnes per annum (tpa) of predominantly non-hazardous mixed waste with a small proportion of that consisting of asbestos waste and clinical waste (approximately 10,000 tpa) including nappies and sharps. Storage areas on the Site are split into the following waste types:

- · Roadsweepings;
- Clinical / offensive;
- Bulky;
- Dry mixed recyclables;
- Plasterboard / wood;
- Residual:
- Co-mingled mixed food and green waste;
- Food;
- Asbestos;
- · End-of-life tyres; and
- Metal.

4.1 Process Description

Waste will be accepted on Site for storage and bulking up prior to transfer to a suitably permitted alternative facility for further recovery or disposal.

The proposed Site will consist of a WTS building, housing designated concrete bays and containers for the storage of waste including co-mingled recyclable materials, bulky waste, paper and cardboard, residual waste, street sweepings, garden waste, clinical waste, and food waste. Outside of the WTS building, asbestos, tyres and metal waste to proposed to be stored in enclosed skips.

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

4.1.1 Clinical Waste

It is proposed that the Site will accept a small amount of clinical waste consisting of nappies and sharps (approximately 10,000 tpa). Clinical waste will be stored within designated containers within the bay inside the WTS building. The WTS building will benefit from impermeable surfacing and a sealed drainage system throughout.

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

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

⁵ Healthcare waste: appropriate measures for permitted facilities - Waste storage, segregation and handling appropriate measures - Guidance - GOV.UK (www.gov.uk), accessed November 2024



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4.2 Specified Waste Management Activities

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

- R3: Recycling or reclamation of organic substances which are not used as solvents;
- R4: Recycling or reclamation of metals and metal compounds;
- R5: Recycling or reclamation of other inorganic materials;
- R13: Storage pending recovery or disposal.
- D9: Physico-chemical treatment not specified elsewhere 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.
- **D14:** Repackaging prior to submission to any of the operations numbered D1 to 13.
- **D15**: Storage pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where it is produced).

4.3 Waste Types and Storage

The Site will accept up to 75,000 tpa of waste, of which approximately 10,000 tpa will consist of clinical waste.

Up to 1,500 tonnes of waste will be stored on Site at any one time. A maximum of 50 tonnes of hazardous waste will be stored on Site at any one time.

Waste will be stored for a maximum of 5 days. Clinical waste will be stored for a maximum of 5 days (typically removed every 2-3 days) prior to transfer off Site to a suitably permitted alternative facility for further recovery or disposal. Green waste will be stored for a maximum of 4 days prior to removal. Food waste will be stored for a maximum of 2 days prior to removal.

The proposed waste to be accepted at the Site are as listed in Table 4-1, Table 4-2 and Table 4-3.

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

EWC Code	Description				
01	WASTES RESULTING FROM EXPLORATION, MINING, QUARRYING, AND PHYSICAL AND CHEMICAL TREATMENT OF MINERALS				
01 01	Wastes from mineral excavation				
01 01 01	Wastes from mineral metalliferous excavation				
01 01 02	Wastes from mineral non-metalliferous excavation				
01 03	Wastes from physical and chemical processing of metalliferous minerals				
01 03 06	Tailings other than those mentioned in 01 03 04 and 01 03 05				
01 03 09	Red mud from alumina production other than the wastes mentioned in 01 03 07				
01 04	Wastes from physical and chemical processing of non-metalliferous minerals				
01 04 08	Waste gravel and crushed rocks other than those mentioned in 01 04 07				
01 04 09	Waste sand and clays				



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EWC Code	Description
20 01	Separately collected fractions (except 15 01)
20 01 01	Paper and carboard
20 01 02	Glass
20 01 08	Biodegradable kitchen and canteen waste
20 01 10	Clothes
20 01 11	Textiles
20 01 34	Batteries and accumulators other than those mentioned in 20 01 33
20 01 36	Discarded electrical and electronic equipment other than those mentioned in 20 01 21, 20 10 23, and 20 01 35
20 01 38	Wood other than that mentioned in 20 01 37
20 01 39	Plastics
20 01 40	Metals
20 01 41	Wastes from chimney sweeping
20 02	Garden and park wastes (including cemetery waste)
20 02 01	Biodegradable waste
20 02 02	Soil and stones
20 03	Other municipal wastes
20 03 01	Mixed municipal waste
20 03 02	Waste from markets
20 03 03	Street-cleaning residues
20 03 07	Bulky waste

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

EWC Code	Description				
09	WASTES FROM THE PHOTOGRAPHIC INDUSTRY				
09 01	Wastes from the photographic industry				
09 01 01*	Water-based developer and activator solutions ⁶				
09 01 02*	Water-based offset plate developer solutions ³				
09 01 03*	Solvent based developer solutions ³				
09 01 04*	Fixer solutions ³				
09 01 05*	Bleach and bleach fixer solutions ³				
09 01 07	Photographic film and paper containing silver or silver compounds ³				

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

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Table 4-3 Proposed Asbestos Waste to be Accepted at the Site

EWC Code	Description				
17	CONSTRUCTION AND DEMOLITION WASTES (INCLUDING EXCAVATED SOIL FROM CONTAMINATED SITES)				
17 06	insulation materials and asbestos-containing construction materials				
17 06 01*	Insulation materials containing asbestos				
17 06 03*	Construction materials containing asbestos				

4.4 Site Infrastructure and Equipment

4.4.1 Site Identification Board

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

The identification board will be inspected at least once per week. In the event of damage or defect that significantly affects the legibility of the board it will be repaired or replaced within a timescale agreed upon with the EA.

The board will display the following information:

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

4.4.2 Plant and Equipment

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

- JCB Excavator with grab
- Tele-truck/bail handles
- Loading shovel
- Telehandler
- Forklift truck

Additional plant and equipment including, but not limited to, water bowser, spray equipment and road sweeper are made available as required.

4.4.3 Plant Maintenance

All items of plant and equipment used on Site will be maintained in accordance with manufacturer's recommendations.

Audits and monitoring will be carried out in accordance with the manufacturer's specifications which are kept in the Site office or available online.



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WLC will take a proactive approach involving a planned preventative maintenance program for the Site. A Maintenance Checklist will allow all Site operatives to actively take part in the Site's maintenance schedule.

The checklist is completed and maintained by the Site manager, with the following information compiled:

- The item that requires maintenance;
- How often maintenance needs to be carried out (daily, weekly, monthly or yearly);
- A record of any particular maintenance instructions; and
- Who on site is responsible for each maintenance check.

The checklist ensures that all Site operatives are aware of their particular responsibilities for maintenance checking. The Site Manager ensures that all Site operatives are aware of any amendments and additions to the checklist.

When a maintenance issue is dealt with, a maintenance record form is completed for each separate piece of equipment or infrastructure. The record form will include the following information to be recorded:

- The item requiring maintenance;
- The frequency of the required maintenance;
- Completed date and who carried out by; and
- Any particular comments.

The record forms will be kept in the Site office to ensure there is access for all Site operatives to the records.

In the event that plant replacement is required, WLC will choose new plant with the lowest emission standard available at the time of purchase.

The following control measures will be in place to reduce as much as possible during operations:

- Use of low sulphur fuel;
- Mobile plant to be switched off when not in use to avoid idling; and
- Planned, preventative maintenance schedule to be rigidly followed to avoid the operation of poor performing or inefficient plant.



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5.0 WASTE PRE-ACCEPTANCE, ACCEPTANCE AND TRACKING

Strict WAP will be followed at the Site to ensure that the site only accepts waste that is:

- Suitable for the activity;
- Allowed by the EP; and
- Appropriately considered by the ERA.

The WAP will also assist with:

- Ensuring the activities do not cause pollution;
- The waste sourcing decision making process; and
- Preventing the receipt of non-permitted wastes.

The proposed WTS will accept up to 75,000 tpa of predominantly non-hazardous mixed waste with a small proportion of that consisting of asbestos waste and clinical waste (approximately 10,000 tpa), including nappies and sharps.

The Site Manager will be responsible for ensuring that WAP are implemented and followed on Site by all Site operatives, and contractors.

5.1 Waste Pre-Acceptance

The Site will implement strict waste pre-acceptance procedures to ensure that enough is known about a waste (including its composition) before it arrives at the Site. The procedure is required to assess and confirm that the waste is technically and legally suitable for acceptance. The procedure will follow a risk-based approach considering:

- The source and nature of the waste;
- Potential risks to process safety, occupational safety and the environment (for example from odour and other emissions); and
- Knowledge about the previous waste holder(s).

The objective of the waste pre-acceptance procedure is to evaluate customer information at the enquiry stage to determine whether the waste could be accepted at the site.

The waste producer / holder will be required to send the necessary waste characterisation information to WLC in advance of delivery of waste materials to the site. This information enables WLC to determine whether the waste stream can be accepted at the Site.

In order for a material to be accepted on site it must have been pre-approved as part of the following

- A local authority or similar tender which includes a contract being made. In this contract the contract clauses must be in line with the site permit, specific to that site
- Have a pre-acceptance form completed and reviewed by the commercial team
- Small customers may be accepted at a site level with pre-acceptance taking place as part of a discussion before tipping.
- The material must be acceptable under the Site permit.

No waste will be accepted at the Site unless the necessary characterisation information has been received in advance and approved for receipt.



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Both new and existing customers will be required to provide characterisation information for each new waste stream.

Enquiries for new waste streams proposed for acceptance at High View Farm WTS will be managed by WLC to will ensure that the waste has been properly assessed and classified in line with WM3⁷. The Site management will ensure that the following waste characterisation information is obtained:

- Details of the waste producer including their organisation name, address and contact details:
- A description of the waste;
- The waste classification code;
- The source of the waste (the producer's business and the specific process that has created the waste);
- Information on the nature and variability of the waste production process;
- The waste's physical form;
- A description of the waste's odour and whether it is likely to be odorous; and
- An estimate of the quantity expected to be received in each load and in a year.

Following classification in line with WM3, the waste will be technically assessed to ensure it is suitable for acceptance and storage on site and meet EP conditions.

Waste pre-acceptance records will be kept for at least 3 years and information will be reassessed if the:

- Waste changes;
- Process giving rise to the waste changes; or
- Waste received does not conform to the pre-acceptance information.

Parameters to be checked at the acceptance stage will be determined when the acceptance of waste has been agreed with a customer.

5.2 **Waste Acceptance**

The Site will implement WAP to check that the characteristics of the waste received matches the information provided during waste pre-acceptance. This will ensure the waste is as expected and that it can be accepted at the Site. The Site Manager is responsible for overseeing waste acceptance, to ensure that procedures are followed by all Site operatives and contractors on Site.

The procedure will follow a risk-based approach considering:

- The source, nature and age of the waste;
- Potential risks to the process safety, occupational safety and environment;
- The potential for self-heating; and
- Knowledge about the previous waste holder(s).

All vehicles bringing waste material to the Site will report to the weighbridge or Site office for visual inspection following which the load will be left in the lorry trailer outside the WTS building ready to be taken in by Site operators for storage. All waste will undergo visual



⁷ Waste classification technical guidance - GOV.UK (www.gov.uk)

inspection during deposition within the WTS building to confirm its description and composition against the relevant accompanying documentation.

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

Should the wastes be found not to conform during the visual inspection, then the details will be recorded, and the waste will be removed to the designated quarantine area as appropriate. Rejected waste will be stored in the quarantine area for a maximum of 36 hours prior to removal from Site an alternative suitably permitted facility.

The records of non-compliant waste received at the Site will include details on:

- · The quantity;
- Characteristics;
- Origin;
- · Delivery date and time; and
- The identity of the producer and carrier.

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

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

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

5.3 Quarantine

The quarantine and rejection procedures will ensure that all non-conforming waste is removed from the Site and that the waste producer and carrier are informed so that appropriate action can be taken to prevent recurrence.

Non-conforming waste will be identified by Site operatives during visual inspection of the waste. Non-conforming waste will be identified by visual and olfactory means.

If unauthorised waste is identified it will be moved to a designated quarantine area, the location of which is illustrated on Drawing 002. The quarantine area will be utilised for the segregation and isolation of any non-confirming waste identified. The area will be clearly marked as the quarantine area. The quarantine area will be located within the WTS building, on an area which will benefit from impermeable surfacing and a sealed drainage system.

Non-conforming waste will be stored in the quarantine area for a maximum of 36 hours, prior to export from Site to a suitably permitted alternative facility.

The maximum storage volume of waste in the area will be 50% of the largest waste stockpile on Site. The Site will have procedures for dealing with non-conforming waste including the maximum storage time for waste in the area. If the waste has the potential to be odorous or attract pests, it will be removed from site within 24 hours to a suitably licenced facility. Burnt waste will be removed from Site within a maximum of 48 hours.

5.4 Waste Tracking

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



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

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

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

- The date the waste arrived on Site;
- The original producer's details (or unique identifier);
- A unique reference number;
- Waste pre-acceptance and acceptance information;
- The package type and size;
- The intended treatment or disposal route;
- The nature and quantity of wastes held on Site;
- Where the waste is physically located on Site;
- Where the waste is in the designated recovery process;
- The staff who have taken any decisions about accepting or rejecting waste streams and who have decided on recovery or disposal options;
- Details that link waste to relevant transfer notes; and
- Details of any non-conformances and rejections, including consignment notes for waste rejected because it is hazardous.

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

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

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



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6.0 WASTE STORAGE

Waste will be stored on Site in accordance with the site layout illustrated on Drawing 002.

All waste inside the WTS building will be stored within designated concrete bays, or containers. The building will benefit from impermeable surfacing, and sealed drainage.

All waste outside the WTS building will be stored in enclosed skips and comprise of asbestos, tyres and metal waste only. Surfacing outside the building comprises of hardstanding. Enclosed skips will prevent the ingress of rainwater to waste.

The following summarises the key waste storage measures to be adopted on Site:

- Waste will be stored in locations that minimise the unnecessary handling of waste (i.e. within close proximity of the treatment plant input and output area);
- Waste handling will be carried out by competent staff using appropriate equipment;
- The majority of waste will be stored within the building and is therefore away from any
 watercourses and sensitive receptors. Wastes stored outside the building will be
 contained within enclosed skips to prevent the escape of waste and ingress of
 rainwater. This also ensures that all waste will be securely stored preventing
 unauthorised access and vandalism;
- The maximum storage capacity for the Site will be 1,500 tonnes. The quantity of stored waste will be monitored against the allowed maximum capacities;
- Waste will be processed as soon as possible and stored on Site for a maximum of 5 days. Treatment will be prioritised for treatment of removal off-Site based on the following:
 - Its type;
 - Its age on arrival;
 - The date of arrival; and
 - The duration of storage on Site.
- Clinical waste will be stored for a maximum of 5 days (typically removed every 2-3 days) prior to transfer off Site to a suitably permitted alternative facility for further recovery or disposal.
- Green waste will be stored for a maximum of 4 days prior to removal.
- Food waste will be stored for a maximum of 2 days prior to removal.
- Food, co-mingled food / green waste, and green waste will be stored in a dedicated bunker inside the transfer building before being transferred off-site to a suitably licensed facility. There will be no treatment of this waste on site.
- Green waste incoming loads will be weighed-in on the weighbridge and directed to
 the dedicated green waste bunker, the loads will be inspected to ensure they meet
 the correct green waste specifications. Mobile plant pushes the tipped waste up to
 ensure all material is inside the bunker. The green waste storage area will benefit
 from impermeable surfacing and a sealed drainage system. The onsite sweeper is
 used to clear any debris from the loading and clear the potential limited volumes of
 leachate from the bunker, which will then be disposed of at permitted disposal sites.
- Bulky waste with POPs will be stored in one bay inside the WTS building.. Waste
 containing POPs shall be identified and segregated from other wastes and stored on
 an impermeable surface with sealed drainage system, to prevent crosscontamination. All wastes containing POPs will be included in the waste transfer note



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with the correct waste code. This waste will then be sent to a suitably authorised disposal or recovery site to either completely destroy the POPs or irreversibly transform the POPs.

- Waste stored outside of the WTS building will comprise of asbestos, metal and tyres
 only. Asbestos, tyres and metals will be stored in skips outside, which will use covers
 to prevent rainwater ingress which can lead to contaminated runoff and also reduces
 the release of asbestos fibres. Asbestos waste shall be double bagged, or where
 necessary, securely wrapped. It will be kept within clearly identified, segregated,
 sealed, secure, lockable bulk containers (i.e. skips). It will not be stored loose or in
 bays.
- A maximum of 50 tonnes of hazardous waste will be stored on Site at any one time.
- All wastes will be subject to inspections and checking against the declaration on the waste transfer note.
- Waste will be treated on a first-in-first-out basis unless more recently received wastes are prioritised because they pose a higher risk of pollution;
- Storage areas will benefit from daily cleaning using brooms and weekly washdowns using hoses;
- Storage areas will be inspected weekly to ensure there is no loss of containment; and
- Any spillages will be cleared and logged in the site diary immediately.

Table 6-1 below details the waste storage arrangements for all waste types accepted on Site.

Table 6-1 Waste Storage Arrangements

Waste Type	Max Length (m)	Max Width (m)	Max Height (m)	Max Volume (m³)	Max Storage Time (days)
Sweepings	9.3	8	3	223.2	5
Clinical / Offensive	9.3	10	4	372	5
Bulky	9.3	12	4	446.4	5
DMR	9.3	12	4	446.4	5
Plasterboard / wood	9.3	12	4	446.4	5
Residual	9.3	12	4	446.4	5
Category 3 Co-mingled (mixed food and green waste)	9.3	12	4	446.4	4
Food	9.3	8	3	223.2	2



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Waste Type	Max Length (m)	Max Width (m)	Max Height (m)	Max Volume (m³)	Max Storage Time (days)
Asbestos (Enclosed 40yd skip)	5.8	2.2	2.5	Max total hazardous waste on site < 50 tonnes	5
Tyres (Enclosed 40yd skip)	5.8	2.2	2.5	31.9	5
Metal (Enclosed 40yd skip)	5.8	2.2	2.5	31.9	5



7.0 WASTE TREATMENT

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

The full process description is detailed within Section 4.1.

Up to date details of the waste characteristics will be kept including the following:

- Simplified process flow sheets that show the origin of the emissions;
- Diagrams of the main plant items where they have environmental relevance including storage areas, and tanks;
- Details of physical treatment processes undertaken on Site;
- An equipment inventory, detailing plant type and design parameters;
- Waste types to be subject to the treatment process;
- The control system philosophy and how the control system incorporates environmental monitoring information;
- The hourly processing capability of waste treatment equipment; and
- A summary of operating and maintenance procedures.

7.1 Waste Treatment Outputs, Including Fines

There will be no waste treatment undertaken on Site, apart from manual separation and sorting of waste and shredding using a mechanical shredder (non-pops potential waste only) Wood & Cat 3 food and green. Outputs will be classified in accordance with Technical Guidance WM3.



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8.0 EMISSIONS CONTROL

8.1 Enclosure within Buildings

The majority of waste handling and storage will take place within the WTS building, with the exception of asbestos, tyres and metal waste storage. Undertaking activities within the building will prevent and minimise emissions of pollution including noise, dust and odour. Waste stored outside of the building are considered unlikely to emit dust or odour.

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

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

8.2 Point Source Emissions to Air

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

8.3 Fugitive Emissions to Air

8.3.1 Odour

The Site will be operated so as to minimise odour emissions from the Site, in line with the OMP submitted as part of this EP variation application. Measures that will be taken at the Ste include:

- Clinical waste types will be kept segregated from the other wastes streams at all times;
- All potentially odourous wastes will be accepted and stored within a new dedicated WTS building. The WTS building will be fully enclosed, to ensure egress of odour from the building is minimised;
- Fast-acting roller shutter doors will be installed on the new WTS building, and kept closed during tipping and unloading of wastes;
- Waste to be stored outside of the WTS building will consist of asbestos, tyres and metal waste only in enclosed skips;
- Strict waste acceptance procedures will be adhered to, to ensure only permitted wastes are accepted on Site;
- All waste storage containers and bays will be clearly labelled to ensure the segregation of waste;
- Odour masking sprays will be fitted within the WTS building;
- Potentially odorous wastes will be a stored for minimal periods of time, with clinical/offensive waste stored for a maximum of 5 days, food waste for a maximum of 2 days and green waste for a maximum of 4 days.

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

8.3.2 **Dust**

The Site will be operated so as to minimise dust emissions from the site, in line with the DMP submitted as part of this EP variation application. Measures that will be taken at the site include:



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- The majority of waste will be accepted and stored within a new fully enclosed WTS building. Waste types stored outside will be contained within enclosed skips.
- Wastes stored outside of the WTS building will consist of asbestos, tyres and metal waste only;
- The WTS building will have fast action roller shutter doors that will be closed during tipping and waste handling;
- Speed limits will be implemented for vehicles using the Site;
- Traffic calming measures will be implemented to enforce speed limits & reduce emissions of dust;
- Site access roads and operational areas will be maintained and repaired to minimise emissions of dust due to uneven and poor surfacing;
- All roads and operational areas will be swept where necessary to reduce dust emissions;
- All vehicles delivering waste to the Site shall be sheeted to minimise emissions of dust; and
- Drop heights will be minimised to prevent emissions of dust.

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

8.3.3 Noise

The following procedures will be in place at the site, and detailed in the NMP submitted as part of this EP variation application to ensure that noise from the acceptance and handling of waste on Site is minimised:

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

Any complaint received will be logged in the Site diary. The Site Manager will investigate the complaint and will take action to identify the source of the noise and implement remedial measures where appropriate.

8.3.4 Litter

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

Strict WAP will ensure that only authorised wastes are accepted;



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

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

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

8.3.5 Mud and Debris

The Site's access road is via the New Years Green Road to the north. All access roads and operational areas of the Site will be tarmacked and as such the risk of mud track out from traffic and plant machinery movements will be low.

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

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

Daily visual inspection of the facility by Site management will identify any problem with mud which will be cleaned up as soon as possible. In the event that mud, debris, or waste arising from the Site is deposited onto public areas outside the site, the following remedial measures will be implemented:

- The affected public areas outside the Site will be cleaned;
- Traffic will be isolated from sources of mud and debris within the Site to prevent further tracking of mud and debris, and measures will be taken to clear any such sources as soon as practicable; and
- Provision will be made for road sweepers on the Site access roads to stop any mud being carried onto public roads, and bowsers made available to damp down areas during dry periods to ensure that dust is not a problem.

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

8.4 Point Source Emissions to Water (Including Sewer)

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

There will be no drainage within the building. All outside storage of waste will take place in enclosed skips, as such there is no point source emissions to water from the site. Any water spilled or collected within the WTS building will be cleared up using dry cleaning methods, or



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pumped from the building using a suitably licensed company and disposed of at suitably licensed facility.

8.5 Fugitive Emissions to Land and Water

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

8.5.1 Site Drainage

The new WTS building will have the benefit of impermeable surfacing, and a sealed drainage system. Small amounts of runoff generated from periodic wash downs will be contained within the building and pumped out as and when required by a suitably licensed company. Outside skips will be stored on hardstanding but will comprise of enclosed skips only.

Clinical waste will be stored within a sealed container within a bay inside of the WTS building. Offensive waste will be stored in bags. The building will benefit from impermeable surfacing and a sealed drainage system throughout. Any contaminated run off from clinical wastes stored within the building would be contained in the building and would be regularly collected by tanker vehicles for removal from Site and off-Site treatment.

In the event of a fire, booms would be deployed by Site operatives to block the WTS building entrances and ensure water is contained. Fire water contained within the building would be drawn off into tankers and transported off Site to an appropriate facility for treatment.

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

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

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

Waste vehicles will be restricted and not permitted to drive over areas of unmade ground. This will be ensured by clear signposting of vehicle routes through the Site.

8.5.2 Containment Bunding

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

- Impermeable and resistant to the stored materials:
- · Have no outlet;
- Be designed to catch leaks from tanks or fittings;
- Have a capacity greater than 110% of the largest tank or 25% of the total tankage (whichever is greater);
- Have pipework routed within bunded areas with no penetration of contained surface;
- Have tanker connection points within the bund; and
- Be subject to regular visual inspection.



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8.6 Pests

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

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

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



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9.0 EMISSIONS MONITORING AND LIMITS

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



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10.0 WASTE MINIMISATION, RECOVERY AND DISPOSAL

The Site will implement a residues management plan that:

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

The key principles of the residues management plan are:

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



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11.0 HEALTHCARE APPROPRIATE MEASURES

Table 11-2 below summarises the EA's Healthcare Waste: Appropriate Measure's for Permitted Facilities⁸ Guidance and confirms which measures are relevant or not relevant to the Site and the proposed operations.

Table 11-1 Healthcare Appropriate Measures

Appropriate Measure	Relevant or Not Relevant
General Management Appropriate Measures	
You must have and follow an up-to-date, written management system that incorporates the listed features	Relevant
Staff Competence	Relevant
Accident Management Plan	Relevant
Accident Prevention Measures	Relevant
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; Do not exceed storage limits in your permit and you continue to apply appropriate measures for storing and handling waste; Stop accepting waste unless you have a clearly defined method of recovery or disposal and enough permitted storage capacity. 	Relevant
You must have contingency procedures to make sure that, as far as possible, you know in advance about any planned shutdowns at waste management facilities where you send waste.	Relevant
You must make your customers aware of your contingency plan, and of the circumstances in which you would stop accepting waste from them	Relevant
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.	Relevant
You must not discount alternative disposal or recovery options on the basis of extra cost or geographical distance if doing so means you could exceed your permitted storage limits or compromise your storage procedures	Relevant
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 you have the appropriate infrastructure in place.	Relevant

⁸ <u>Healthcare waste: appropriate measures for permitted facilities - Guidance - GOV.UK (www.gov.uk)</u>, accessed July 2024



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Appropriate Measure	Relevant or Not Relevant
Treatment sites only	Not Relevant: no waste treatment.
Plant Decommissioning	Relevant
Waste Pre-Acceptance, Acceptance, and Tracking Appropriate Measu	ires
Waste Pre-Acceptance	Relevant
Waste Acceptance	Relevant
Waste Tracking	Relevant
Waste Storage, Segregation and Handling Appropriate Measures	
You must not store individual bags and containers (for example, bins and boxes) of waste loose	Relevant
You must store and handle bagged waste on site in fully enclosed, lockable, rigid, leak-proof and weather proof bulk containers (for example carts)	Relevant
Rigid waste containers (bins and boxes, including pallet boxes) must be sealed and in good condition. You should store and handle them in an upright position (as far as possible) to prevent or, where that is not practicable, to minimise the risk of spillages. They must be stored either: • In enclosed bulk containers (for example, carts); • On pallets, stacked no more than 2.2m high (including the height of the pallet).	Relevant
You must make sure that containers stored or handled on pallets are stable and secured with shrink wrap. The containers must not extend beyond (overhang) the sides of the pallet. The shrink wrap must be clear or transparent so you can identify waste types, damaged containers, leaks or spillages and incorrectly stacked containers. If you know waste contains free liquid (for example, chemical wastes such as fixer and developer solutions) you must store the pallets in a dedicated area of facility that has self-contained drainage.	Not Relevant: waste not stored / handled on pallets.
Bulk containers must have a lid and you must securely close the lid whenever they contain any waste, except when waste is being loaded into or unloaded from them.	Relevant
You must clearly establish the maximum storage capacity of the site and designated storage areas and you must not exceed these maximum capacities. You must define capacity in terms of numbers of carts, containers or pallets as well as by tonnage. You must regularly monitor the quantity of stored waste on the site and designated areas to check against the allowed maximum capacity.	Relevant
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.	Relevant



Appropriate Measure	Relevant or Not Relevant
Where wastes are known to be sensitive to heat, light, air or water you must make sure that they are protected from these ambient conditions, for example, by storing the wastes in a building or under cover. These storage provisions apply to any container held in any storage area, or which is being emptied, sorted, repackaged or otherwise managed.	Relevant
You must store and handle all pharmaceutical, chemical, anatomical and palletised wastes securely within designated areas of a secure building. A building is a covered structure enclosed on all vertical sides that provides sheltered cover and contains emissions of, for example, noise, particulate matter, odour and litter.	Relevant
You must store anatomical waste and animal carcasses in designated refrigerated units (operating below 5°C) unless you are storing them on site for less than 24 hours (72 hours if over a weekend)	Not Relevant
You must store and handle infectious wastes that are not pharmaceutical, chemical, anatomical, or palletised wastes in a secure building.	Relevant
You must store and handle offensive wastes in a secure building or in secure, fully enclosed, rigid, waterproof and leak-proof bulk containers. If you store waste externally in bulk containers, the containers must remain closed at all times, except when waste is being loaded or unloaded from them.	Relevant
You must not store or hold wastes on site in vehicles or vehicle trailers, unless they are being received or prepared for imminent transfer (that is, they will be removed from site within 24 hours, or 72 hours if over the weekend)	Relevant
You must store floc produced by alternative treatment plant in fully enclosed, waterproof and leak-proof containers. You must store the wastes produced by incineration plant following technical guidance for the waste incineration sector.	Not Relevant
You must maintain the integrity of waste packaging at all times. You should design and operate your facility in a way that minimises waste handling. You must never throw, walk on or handle healthcare wastes in a way that might damage the packaging.	Relevant
You must store waste in a way that protects its integrity and prevents, or, where that is not possible, minimises the risk of packaging failing. You must pay particular attention to items at or near the bottom of bulk containers and avoid, for example, overloading, compressing or puncturing waste.	Relevant
You must store different healthcare wastes according to waste type and destination. You must store the listed waste types in separate storage areas or containers. This is to prevent physical contact or a leak from one contaminating another waste types or its packaging.	Relevant
You must store all bulk waste containers in a way that allows safe and easy access for inspection at all times and minimises the need to remove others that may be blocking access. You must maintain safe access (inspection aisles) to at least one side of palletised wastes. You must	Relevant



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Appropriate Measure	Relevant or Not Relevant
handle and store containers so that labels and markings are easy to see and continue to be legible.	
You must not stack bulk containers, carts and pallets that contain waste whilst they are being stored on site, unless they are held in purpose-built racking systems	Relevant
You must clearly establish the maximum storage times of wastes held on site. Wastes should be treated on, or remove from, the site as soon as possible. You must not store relevant wastes on site for longer than these maximum storage times.	Relevant
Maximum Storage Times for Different Types of Healthcare Waste	,
You can store the listed waste types for up to 7 days if outside, or for up to 14 days if stored in a building.	Relevant
You can store refrigerated anatomical waste for up to 14 days.	
You can store unrefrigerated anatomical waste for up to 24 hours, or up to 72 hours if over a weekend.	
The listed wastes can be stored for up to 6 months	
You must prioritise the treatment or off-site transfer of waste based on: its type, age on arrival, date of arrival, duration of storage on site.	Relevant
You should follow the first-in, first-out principle and also identify and prioritise wastes with a higher risk of causing odour, litter or pest problems.	
You must not open and repackage (bulk) individual waste packages and containers (for example bags, bins, boxes and blister packs), unless the packaging is designed to be reused. If you receive waste in damaged packaging you must record this as a non-conformance. You must transfer the contents to a new, clearly labelled container or package of the appropriate type and conditions.	Relevant
If you repackage waste received in containers designed for reuse, the repackaging must be specifically authorised by the environmental permit (for example, as a D14 or R12 waste operation). You must repackage waste inside a building and make sure you protect the safety of staff and prevent potential emissions. For example, you could use an automated process in a contained environment with air extraction and abatement. You must carefully record the transfer of waste from individual packages or containers to bulk containers and must update the waste inventory accordingly.	Not Relevant: no repackaging undertaken
Unless specifically authorised by your environmental permit, you must not mix hazardous waste with other categories of hazardous waste, or with other wastes or materials.	Relevant
The type and quality of storage area surfaces must be suitable for effective disinfection with a broad spectrum agent. Your procedures must make sure that surfaces are regularly cleaned and disinfected.	Relevant
Once emptied, you must check all bulk containers to make sure you have removed all of the waste and then clean them inside and out. You must disinfect containers that have held infectious waste.	Relevant



Appropriate Measure	Relevant or Not Relevant
You must inspect bulk containers used to transport waste before each reuse to make sure that: they have been cleaned and disinfected, they are physically sound, the locking mechanism works, they meet the relevant requirements of the Carriage of Dangerous Goods and Use of Transportable Pressure Equipment Regulations.	Relevant
The methods you use for cleaning and disinfecting surfaces and containers must: physically remove contamination, be capable of achieving disinfection across the broad spectrum of micro-organisms with the parameters used (time, concentration, temperature, quantity), not produce emissions of pathogenic bioaerosols or chemical agents, or must make sure these emissions are contained and managed appropriately.	Relevant
You must: contain wash waters within an impermeable area and either discharge them to foul sewer or dispose of them appropriately off site, prevent run-off into external areas or to surface water drains, prevent healthcare waste items from being discharged to water (including sewer).	Relevant
The way you store and handle waste must prevent pests and vermin. You must have specific measures and procedures in place to identify and manage any wastes that are causing pests or vermin at your site.	Relevant
You must inspect storage areas, containers and infrastructure daily. You must deal with any issues immediately. You must keep written records of the inspections. You must rectify and log any spillages of waste.	Relevant
Your site must have suitable procedures, equipment and broad spectrum disinfectants to deal with the chemical and biological spillages that may arise from waste types accepted at your facility. All staff must be aware of their location and trained in their use.	Relevant
You must only move wastes between different locations (or load for removal off site) following written procedures. You must then amend your waste tracking system to record these changes.	Relevant
When you load vehicles you must prevent leakage or contamination of one waste type (or its packaging) by another waste type. You must have written procedures to check outgoing vehicles and loads to confirm you have met these requirements.	Relevant
Your site inventory must be able to track and link all incoming consignments of waste to specific outgoing waste loads and their documentation.	Relevant
If you transfer waste, you must be able to demonstrate that the description and classification for the outgoing waste is the same as that for the incoming waste – unless the incoming waste description and classification was incorrect or incomplete.	Relevant
Compaction of Healthcare Waste	Not Relevant: no compaction
Waste Treatment Appropriate Measures	
General Waste Treatment	Not Relevant: no waste treatment



Appropriate Measure	Relevant or
Plant Commissioning and Validating the Efficacy of Treatment	Not Relevant: Not Relevant: no waste treatment
Validation Tests for Treating Infectious Wastes	Not Relevant: no waste treatment
Validation Tests for Treating Wastes Contaminated with or Containing Medicines	Not Relevant: no waste treatment
Validation Tests for Treating Wastes Contaminated with or Containing Chemicals	Not Relevant: no waste treatment
Validation Tests for Treating Anatomical Wastes	Not Relevant: no waste treatment
Routine Plant Efficacy Testing	Not Relevant: no waste treatment
Emissions Control Appropriate Measures	
Point Source Emissions to Air	Not Relevant: no point source emissions to air
Fugitive Emissions to Air (including odour)	
You must use appropriate measures to prevent emissions of dust, mud and litter, and odour	Relevant
You must design, operate and maintain storage and treatment plant in a way that prevents fugitive emissions to air, including dust, organic compounds and odour. Or where that is not possible, you must minimise these emissions. Storage and treatment plant includes associated equipment and infrastructure such as: shredders, conveyors, skips or containers, building fabric including doors and windows, and pipework and ducting.	Relevant
To make sure fugitive emissions are collected and directed to appropriate abatement, your treatment plant must use high integrity components (for example, seals or gaskets). Your treatment plant must be fully enclosed, with air extraction systems located close to emission sources where possible.	Not Relevant: no treatment plant
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 of these wastes you must: • Take appropriate, risk assessed measures to prevent and control emissions; • Prioritise their treatment or transfer.	Relevant



Appropriate Measure	Relevant or Not Relevant
 Where necessary, to prevent fugitive emissions to air from the storage and handling of such 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, for example, conveyors, hoppers, containers, tanks and skips Keep building doors and windows shut to provide containment, other than when access is required for loading and unloading Keep enclosed buildings and equipment under adequate negative pressure with an appropriate abated air circulation or extraction system, where possible, locating air extraction points close to potential emissions sources Use fast-acting or 'airlock' doors that default closed 	Relevant
You must set up a leak detection and repair programme and use it to promptly identify and mitigate any fugitive emissions from treatment plant and associated infrastructure (for example, pipework, conveyors, tanks)	Relevant
You must regularly inspect and clean all waste storage and treatment areas, equipment (including conveyor belts) and containers or carts	Relevant
Your maintenance and cleaning schedules must make sure that tanks and plant are regularly cleaned to avoid large-scale decontamination activities	Relevant
You must take measures to prevent the corrosion of plant and equipment (for example, conveyors or pipes). This includes selecting and using appropriate construction materials, lining or coating equipment with corrosion inhibitors and regularly inspecting and maintaining plant.	Relevant
You must have an appropriate regular maintenance programme covering all buildings, plant and equipment. This must also include protecting equipment such as air ventilation and extraction systems, curtains and fast-action doors to prevent and contain fugitive releases.	Relevant
If you carry out container washing activities, you must design and operate the washing process and associated equipment in a way that prevents fugitive emissions to air. For example, carrying out this activity in a contained or enclosed system.	Not Relevant: no container washing
You must fully enclose and contain pre- and post- treatment shredder plant to prevent emissions. You must design and operate the shredder plant using appropriate process interlocks so that it cannot operate unless it is enclosed and contained. For example, only when the loading door and the hopper has been closed or sealed.	Not Relevant: no shredding of waste
Where a dust management plan is required, you must develop and implement it following EA guidance.	Relevant
You must have procedures to minimise the amount of time odorous wastes spend in your storage and handling systems. In particular you must have provisions to manage waste during periods of peak volume.	Relevant
You must have measures to contain, collect and treat odorous emissions, including using contained buildings and plant or equipment with	Relevant





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12.0 INFORMATION

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

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

12.1 Reporting and Notifications

12.1.1 Changes in Technically Competent Persons

The EA will be informed in writing of any changes in the technically competent management of the Site and the name of any incoming person, together with evidence that such person has the required technical competence.

12.1.2 Waste Types and Quantities

A summary report of waste types and quantities accepted and removed from the site for each quarter, will be submitted to the EA within one month of the end of the quarter unless otherwise required by the permit conditions.

12.1.3 Relevant Convictions

The EA will be notified of the following events:

- WLC being convicted of any relevant offence; and
- Any appeal against a conviction for a relevant offence and the results of such an appeal.

12.1.4 Notification of Change of Operator's or Holder's Details

The EA will be notified of the following:

- Any change in the operator's trading name, registered name or registered office address; and
- Any steps taken with a view to the company going into administration, entering into a company voluntary arrangement or being wound up.

12.1.5 Adverse Effects

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

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



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