SECTION 3

Environment Management System



ENVIRONMENTAL MANAGEMENT SYSTEM

A Buckler Haulage Ltd

At, Lloyd Street

Middlesbrough

Cleveland

TS2 1DW

Olive Compliance Ltd
Planet House
Northumbrian Way
Killingworth
NE12 6EH
Company Number:12861220

Issue and Revision Record

Revision	Date	Originator	Description of Change
V1	01/08/2025	OCL	New for Permit
V2			
V3			

BASIS OF REPORT

This report has been prepared by Olive Compliance Ltd with all reasonable skill, care and diligence, and taking account of the manpower and resources devoted to it by agreement with the client. Information reported herein is based on the interpretation of data collected and has been accepted in good faith as being accurate and valid.

This report is for the exclusive use of A Buckler Haulage Ltd, no warranties or guarantees are expressed or should be inferred by any third parties. This report may not be relied upon by other parties without written consent from Olive Compliance Ltd.

Olive Compliance Ltd disclaims any responsibility to the client and others in respect of any matters outside the agreed scope of the work.

Information reported herein may be based on the interpretation of public domain data collected by Olive Compliance Ltd, and/or information supplied by the Client and/or its other advisors and associates. The data has been accepted in good faith as being accurate and valid.

The copyright and intellectual property in all drawings, reports, specifications, bills of quantities, calculations and other information set out in this report remain vested in Olive Compliance Ltd unless the terms of appointment state otherwise.

CONTENTS

1.0 SITE INTRODUCTION 7

1.1 Site Location 7

1.2 Site Permit 7

1.3 Drawings 7

1.4 Site Activities 7

1.5 Hours of Operation 9

1.6 Site Notice Board 9

1.7 Staff and Site Management 10

1.8 Staff Training 10

1.9 Document Control 10

1.10 Recording 10

1.11 Notifications and Reporting 11

2.0 SITE AND EMERGENCY CONTACTS 14

3.0 STANDARD OPERATING PROCEDURES 15

3.1 Emergency Procedures 15

3.1.1 Fire 15

3.1.2 Flooding 15

3.1.3 Severe accident or fatality 15

3.1.4 Major spillage 15

3.1.5 Communication 16

3.1.6 Training 16

3.1.7 Testing and Reporting 16

3.2 Waste Acceptance Procedure 17

3.2.1 Pre-acceptance procedures to assess waste 17

3.2.2 Waste Transfer Note 18

3.2.3 Waste Acceptance Procedure 19

3.2.4 Non-compliant waste 19

3.3 Non-Conforming Waste Procedure 21

3.3.1 Waste Rejection Note 21

3.4 Waste Management, Storage and Treatment 22

3.4.1 Stockpile Management 22

3.4.2 Waste Treatment 22

3.5 Waste Outputs 23

3.5.1 Residual Waste 23

3.5.2 Recovery Sites and Duty of Care 23

3.5.3 Waste Classification and WAC Testing 23

3.5.4 Waste Transfer and Compliance 23

3.7 Site Security 25

3.8 Daily Site Inspections and Audits 26

3.9 Monitoring and Control 27

3.10 Traffic Management 28

3.11 Noise Management and Minimisation 29

3.11.1 Plant and Equipment 29

3.11.2 Monitoring 30

3.11.3 Complaint Records 30

3.12 Odour Management 31

3.12.1 Odour Survey 31

3.13 Pest Management 32

3.13.1 Management of pesticides 32

3.14 Litter Management 33

3.15 Dust Management 34

3.15.1 Dust Monitoring 34

3.16 Additional Management Plans 35

3.17 Site Drainage 36

3.18 Training Procedure 37

3.18.1 Site Operative Training 37

3.18.2 Technically Competent Manager 38

3.19 Accident Procedure 39

3.19.1 Hazard Identification 39

3.19.2 Risk Estimation 39

3.19.3 Control Techniques 39

3.20 Spillage Procedure 46

3.20.1 On-site control procedures 46

3.20.2 Major Spillage 46

3.20.3 Minor Spillage 47

3.21 Maintenance Procedure 48

3.22 Complaints Procedure 49

3.23 Contingency Planning 50

3.23.1 Breakdowns 50

3.23.2 Enforced Shutdowns 50

3.23.3 Fire 50

3.23.4 Storage Capacity 50

3.24 Record Keeping 52

3.25 Closure 53

4.0 RECORDING AND REPORTING FORMS 54

CLIMATE CHANGE RISK ASSESSMENT AND ADAPATION PLAN

A Buckler Haulage Ltd

At, Lloyd Street
Middlesbrough
Cleveland
TS2 1DW

Olive Compliance Ltd
Planet House
Northumbrian Way
Killingworth
NE12 6EH
Company Number:12861220

Issue and Revision Record

Revision	Date	Originator	Description of Change
V1	17/12/2025	Olive Compliance Ltd	New for permit application
V2			
V3			

BASIS OF REPORT

This report has been prepared by Olive Compliance Ltd with all reasonable skill, care and diligence, and taking account of the manpower and resources devoted to it by agreement with the client. Information reported herein is based on the interpretation of data collected and has been accepted in good faith as being accurate and valid.

This report is for the exclusive use of A Buckler Haulage Ltd, no warranties or guarantees are expressed or should be inferred by any third parties. This report may not be relied upon by other parties without written consent from Olive Compliance Ltd.

Olive Compliance Ltd disclaims any responsibility to the client and others in respect of any matters outside the agreed scope of the work.

Information reported herein may be based on the interpretation of public domain data collected by Olive Compliance Ltd, and/or information supplied by the Client and/or its other advisors and associates. The data has been accepted in good faith as being accurate and valid.

The copyright and intellectual property in all drawings, reports, specifications, bills of quantities, calculations and other information set out in this report remain vested in Olive Compliance Ltd unless the terms of appointment state otherwise.

Contents

1.SCOPE **5**

2. WRITING THE RISK ASSESSMENT **6**

2.1 Risk Scoring Matrix 6

3. MONITOR, REVIEW AND UPDATING THE RISK ASSESSMENT AND PLAN **7**

4.INFORMATION SOURCES **8**

5.CLIMATE PROJECTIONS **9**

6.SITE INTRODUCTION AND ACTIVITIES **16**

6.1 Site Permit 16

6.2 Site Location and Receptors 16

7. SITE FLOOD RISK **18**

8. IMPLEMENTATION AND PROCEDURES **20**

9. RESILIENCE FOR 2050 AND 2100 ..... **37**

1.Scope

Climate change means that extreme weather incidents are becoming more common and more severe.
Climate projections show that over the coming decades there is an increased risk of climate change impacts, including:

- extreme rainfall, leading to more frequent and severe floods
- heat waves
- drought
- rise in sea levels and tidal surges
- storms
- wildfires

The drive is to ensure that A Buckler Haulage Ltd is here for many decades to come is therefore underpinned by a long-term commitment to the family business.

Sustainability encompasses the environmental needs alongside economical and core business performance. This Climate Change Risk Assessment and Adaptation Plan is part of the commitment to long-term sustainability that demonstrates our awareness of the risks, and the actions we will be taking to mitigate them.

A three-stage approach has been taken to assess these risks and the impacts that could have an impact on the businesses directly. Planning for this will help to:

- remain in compliance with the environmental permit, other obligations and regulations
- minimise the sites impact on the environment during an extreme weather event and the event's impact on operations, either through accidental release or abnormal operation
- improve resilience and business continuity by avoiding unplanned start-ups, shutdowns and other business interruptions

2. Writing the Risk Assessment

The following procedure and supporting Risk Assessment covers the integration of climate change adaptation into the company/site management system.

This procedure and risk assessment considers:

- the risks to the business from climate change
- the risks the business creates due to climate change
- how to embed management and site controls

The risk assessment and plan of action reflects the risk that climate change creates for site operations.

Planning in response to the risk of a rise by 2C by 2050 and a rise of 4C by 2100 include installation of a rainwater collection system, longer-term consideration of infrastructure including pipework and effect of heat on electrical equipment and associated components.

This is covered in Section 9 of this report.

2.1 Risk Scoring Matrix

Risk ratings are identified using the below matrix system.

- Low – 1-2
- Medium – 3-4
- High – 6-9

LIKELIHOOD ↓ / SEVERITY →	1	2	3
1	LOW – 1 –	LOW – 2 –	MEDIUM – 3 –
2	LOW – 2 –	MEDIUM – 4 –	HIGH – 6 –
3	MEDIUM – 3 –	HIGH – 6 –	HIGH – 9 –

3. Monitor, Review and Updating the Risk Assessment and Plan

This plan is considered to be a 'working' document that will be reviewed and updated annually or as required to ensure that:

- the site is achieving its original objectives
- priority risks are managed
- the plan is still effective
- the plan needs changing
- important new climate change information becomes available
- the site is affected by an extreme weather event or near miss

To help monitoring, the facility will record any:

- severe weather events and near misses and the effect they have on the business.
- monitor impacts on the supply chain where this threatens environmental compliance.
- lost production time or environmental incidents caused by severe weather events could influence future decision making on the site.

Near misses and accidents are recorded in line with the site Accident Management Plan.

Any review, will consider:

- the objectives of the adaptation intervention and if these were achieved.
- if more, less or a different intervention is needed.
- if the forecasting for the site plan is still relevant and appropriate.

It will be the responsibility of the Operator or nominated person to maintain this plan and to ensure it is maintained with any measures and controls implemented and staff are trained on the procedure and risks.

4.Information Sources

The below reference sources have been used to assist in the preparation of this Risk Assessment.

Flood risk - https://flood-map-for-planning.service.gov.uk/ accessed 2024.

Drought - EA Waste Treatment CCRA example accessed 2024.

Storm risk- LINK accessed 2024.

Temperature - Met Office data LINK, temperatures LINK accessed 2024.

Rainfall - Met office data LINK, rainfall data direct LINK accessed 2024.

MAGIC (defra.gov.uk) accessed March 2024.

Middlesborough County Council Website Home | Middlesbrough Council

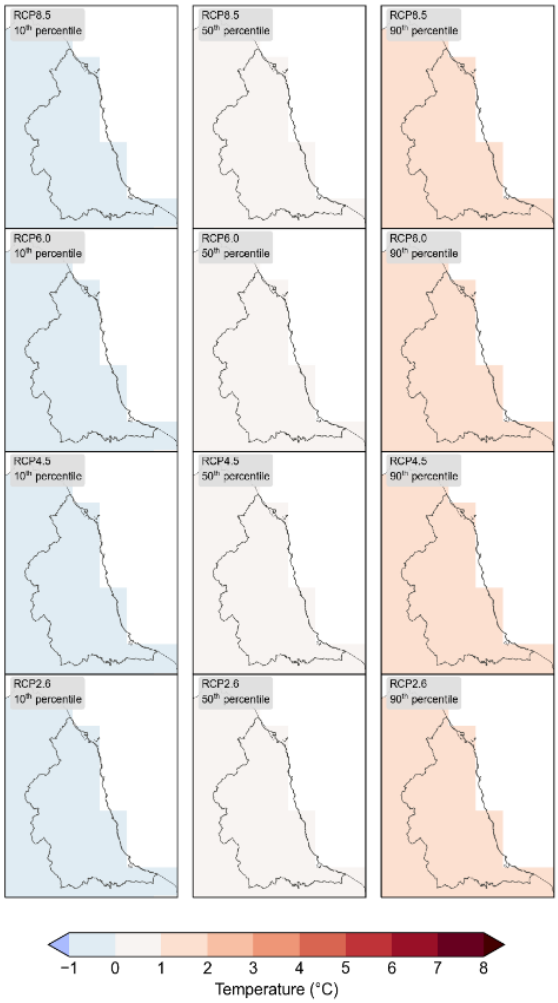
What will climate change look like in your area? - BBC News accessed 2024.

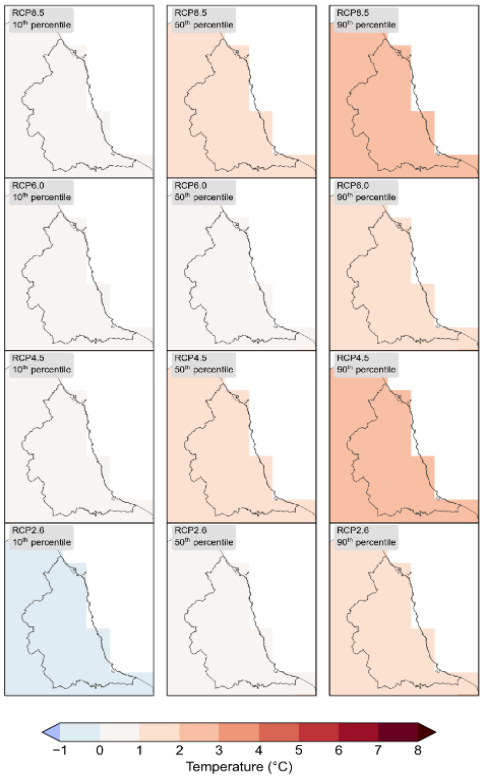
5.Climate Projections

Table 1 is a subset of maps with the predicted temperatures using Met Office projections. These show the increase in temperature for summer and winter for 2024, 2050 and 2099 for the Northeast region.

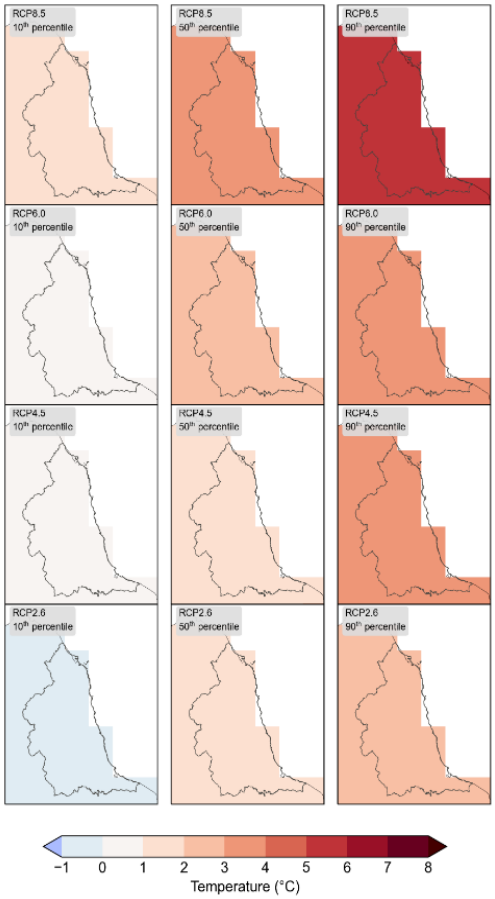
Table 2 is a subset of maps with the predicted increase in rainfall using Met Office projections, for summer and winter for 2024, 2050 and 2099 for the Northeast region.

The below projections will be monitored and assessed as part of the risk assessment and adaptation strategy.

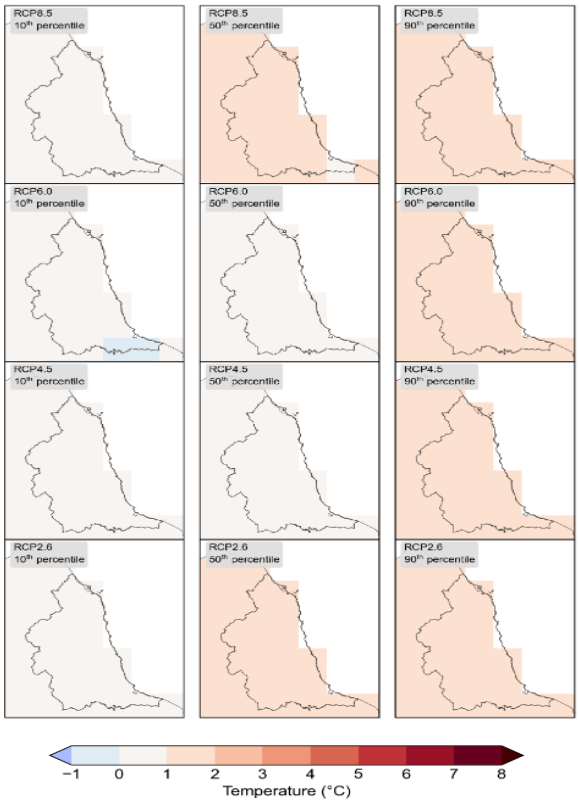
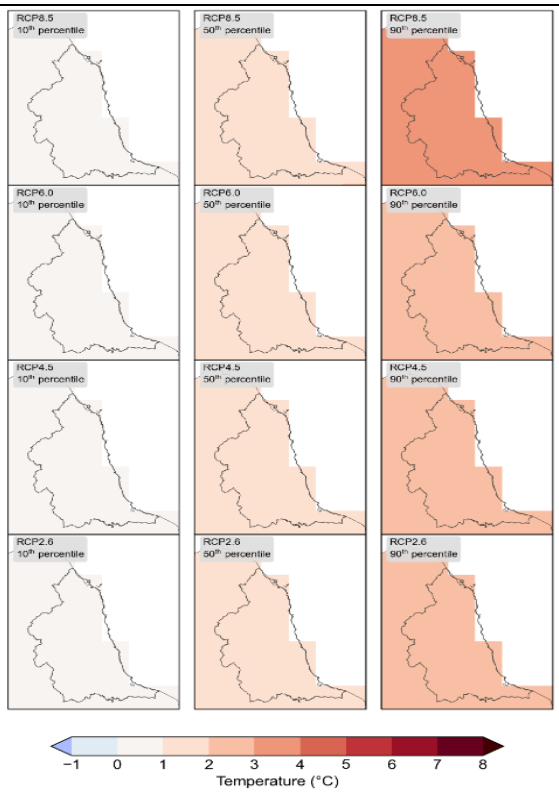
Mean Temperature Winter	
2024	
2040-2059	

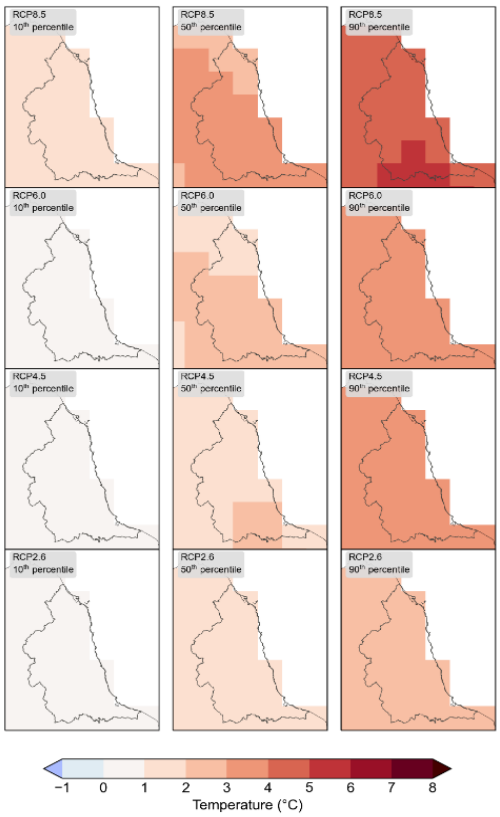


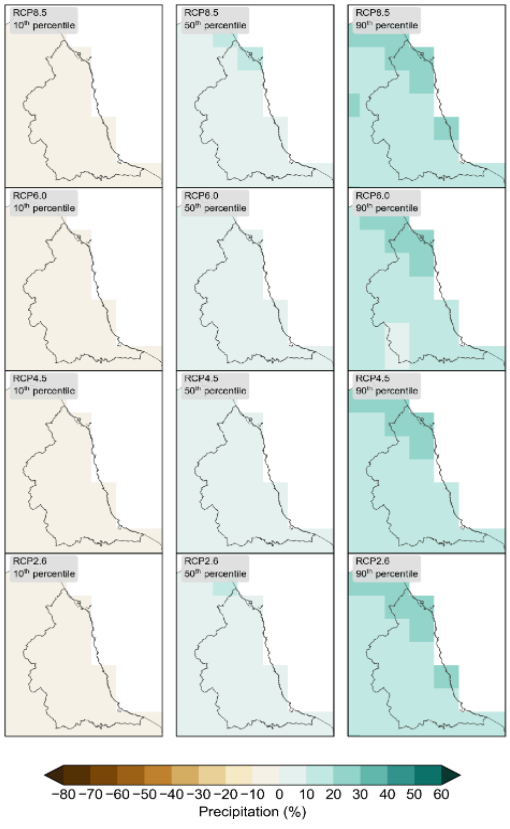
2080 - 2090

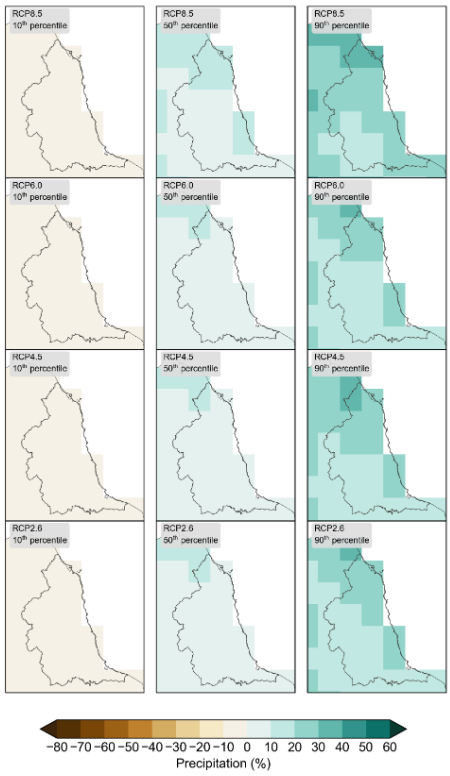
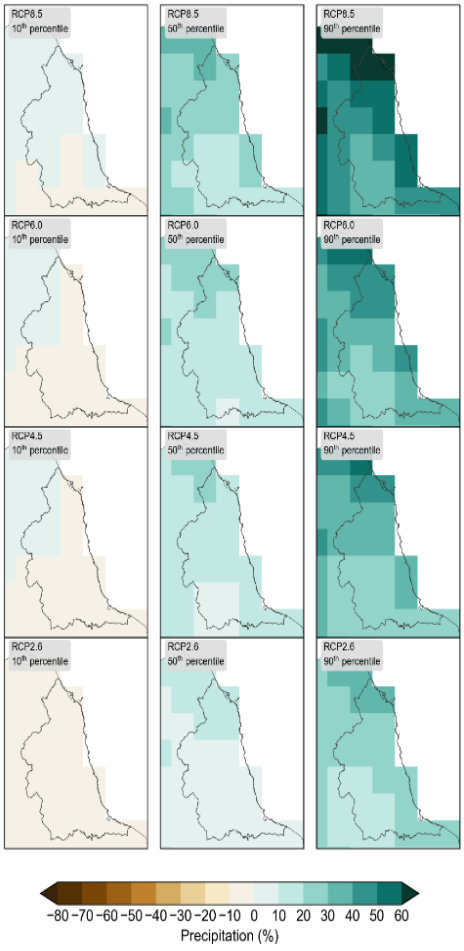


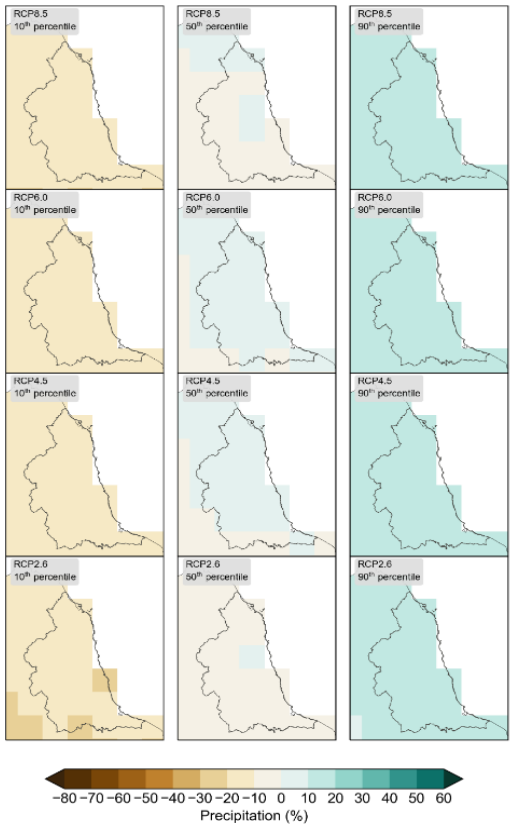
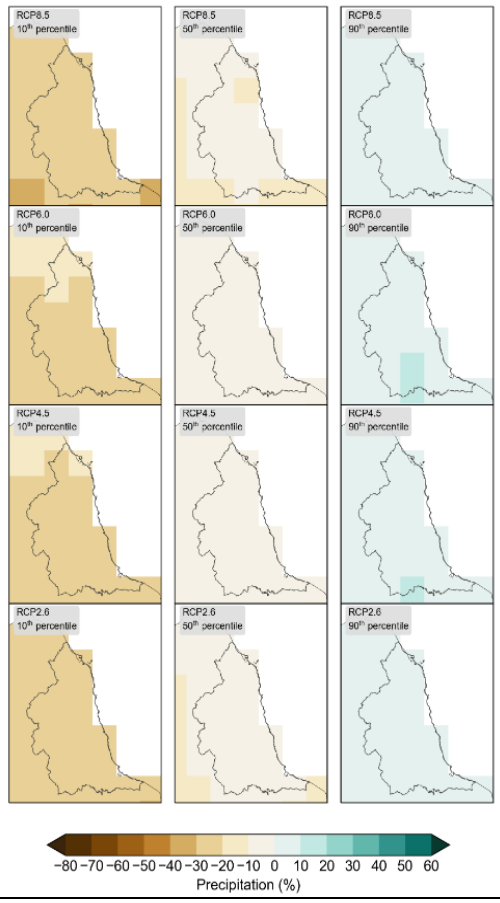
Mean Temperature Summer

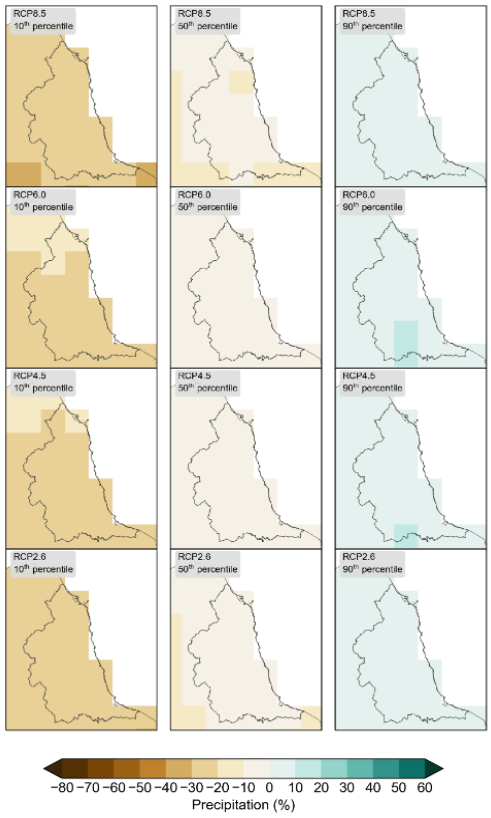
2024	
2040 - 2059	

2080 - 2090	

Mean Rainfall Winter	
2024	

2040-2059	
2080-2099	
Mean rainfall summer	

2024	
2040-2059	

2080-2099	RCP8.5 10th percentile RCP8.5 50th percentile RCP8.5 90th percentile RCP6.0 10th percentile RCP6.0 50th percentile RCP6.0 90th percentile RCP4.5 10th percentile RCP4.5 50th percentile RCP4.5 90th percentile RCP2.6 10th percentile RCP2.6 50th percentile RCP2.6 90th percentile −80 −70 −60 −50 −40 −30 −20 −10 0 10 20 30 40 50 60 Precipitation (%)

6.Site Introduction and Activities

Operator: A Buckler Ltd

Operated and permitted at: Lloyds Street, Middlesbrough, Cleveland, TS2 1DW.

Permit reference:

6.1 Site Permit

The permit allows the company to operate a Waste Transfer Facility, primarily to store waste at a specified location and treat it to produce soil, soil substitutes and aggregate, with the storage of demolition wastes such as wood and metals at low levels.

The total quantity of waste that can be stored and subsequently treated at the site under these standard rules shall be no more than 75,000 tonnes per year.

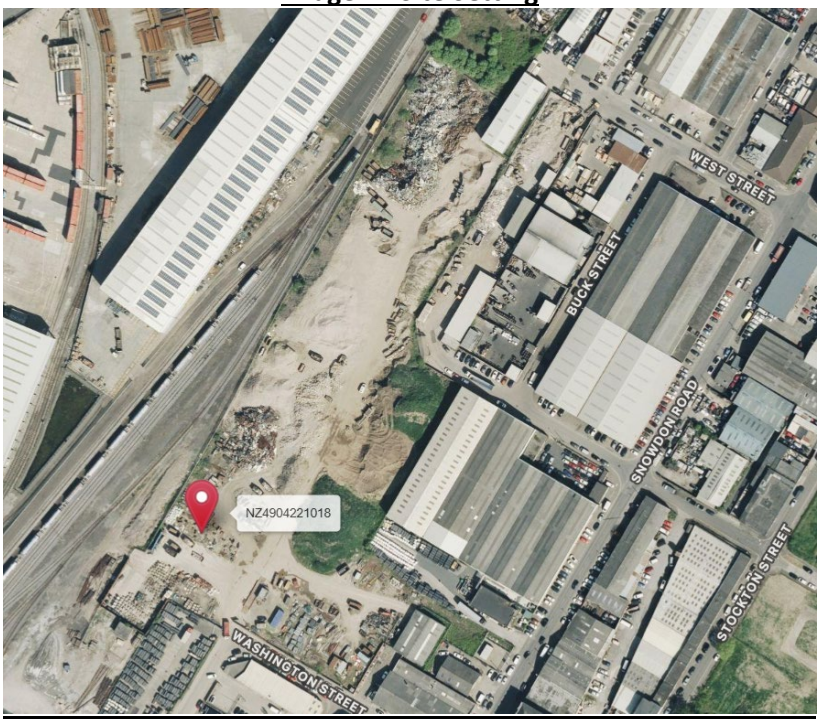
6.2 Site Location and Receptors

The site is located at Lloyds Street, Middlesbrough, Cleveland, TS2 1DW.

The national grid reference for the site is: NZ 49156 20972.

The site lies within an industrial estate, bounded by agricultural and rural areas.

Image 1 - Site Setting



Consideration must be given to sensitive receptors that may be affected from site operations in the event of an extreme weather event such as:

- schools, hospitals, nursing and care homes, residential areas, workplaces;
- protected habitats, watercourses, groundwater, boreholes, wells and springs supplying water for human consumption;
- roads, railways, bus stations, pylons (on or immediately adjacent to the site only), utilities, airport.

Table 3 below identifies sensitive receptors within 1km of the site.

Following a review of the below receptors, site activities would not impact on local sensitive receptors in the event of an extreme weather event or from the gradual change in climate conditions.

Table 3 - Sensitive Receptors

Receptor	Distance from site (m)	Phone Number
Middlesbrough College	1km East	01642333333
River Tees	776m N/E	N/A
Middlesbrough Train Station	667m East	N/A
A66	374m South	N/A
Transporter Bridge	1km N/E	N/A
Hill Street Shopping Centre	595m S/E	01642211123
Teesside Combined Court Centre	1km S/E	01642340000
Teessaurus Park	908m North	01642726001

7. Site Flood Risk

Sea levels may rise as high as 0.6m above today's levels.

For information, the Environment Agency issue three levels of flood warning:

Flood alert - Prepare

- prepare a bag that includes medicines and insurance documents
- check flood warnings

Flood warning - Act

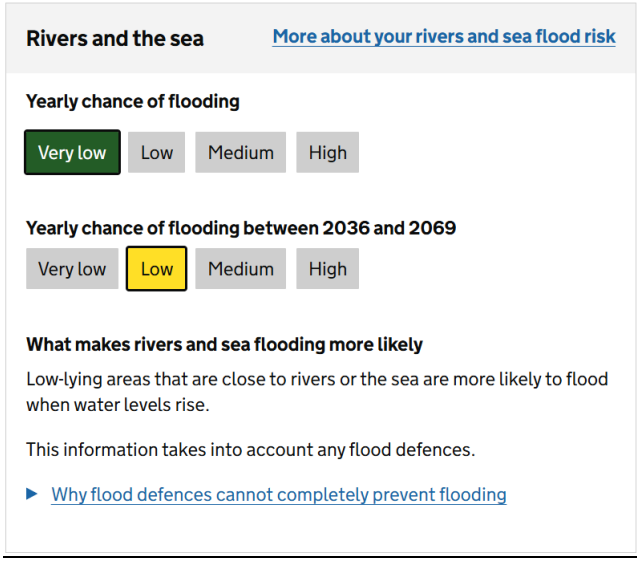
- turn off gas, water and electricity
- move things upstairs or to safety
- move family, pets and car to safety

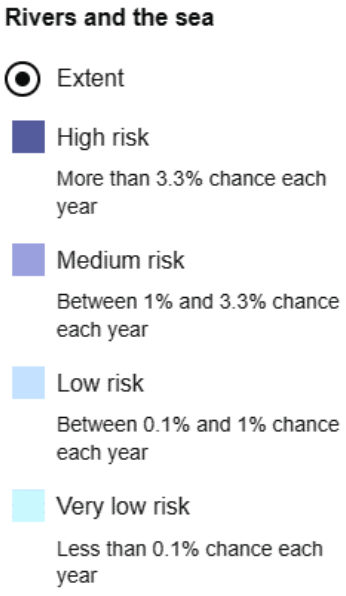
Severe flood warning - Survive

- call 999 if in immediate danger
- follow advice from emergency services
- keep yourself and your family safe

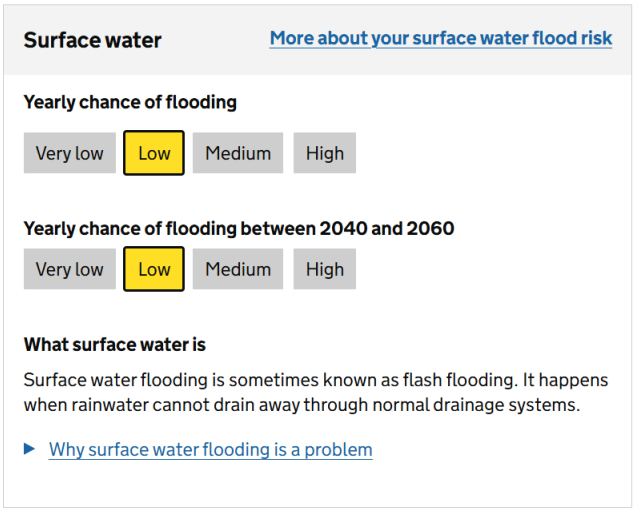
Checks conducted on the UK https://check-long-term-flood-risk.service.gov.uk/site identify the site as being located in an area of very low risk from flooding by surface water, rivers and the sea.

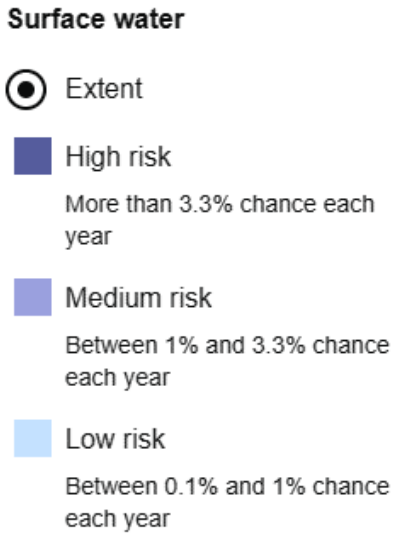
Risk of flooding from rivers and seas – TS2 1DW





Risk of flooding from surface waters – TS2 1DW





Other flood risks

Groundwater - Flooding from groundwater is unlikely in this area

Reservoirs - Flooding from reservoirs is unlikely in this area.

Middlesborough Council publish their Flood Management strategy and documents on their website at:

Flood risk management | Middlesbrough Council

For more information on the council's flood and coastal risk management functions, they can be contacted on:

- Flooding report
- phone: 01642 245432

8. Implementation and Procedures

Control and mitigation measures in the risk assessment below, are managed within the company Environmental Management System (EMS). These include the reporting and recording of incidents on site. Procedures referenced below support this risk assessment (Table 4).

- Daily inspections and monitoring (SOP 3.8)
- Emergency Procedures (SOP 3.1)
- Contingency Planning (SOP 3.22)
- Complaints Procedure (SOP 3.21)
- Maintenance Procedure (SOP 3.20)
- Odour Management Procedure (SOP 3.12)
- Litter Management Procedure (SOP 3.14)
- Dust Management Procedure (SOP 3.15)
- Pest Management Procedure (SOP 3.15)

Table 4 – Climate Change Risk Assessment

Potential changing climate variable	A Impact	B Likelihood	C Severity	D Risk (B x C)	E Mitigation (what will you do to mitigate this risk)	F Likelihood (after mitigation)	G Severity (after mitigation)	H Residual risk (F x G)
1. Summer daily maximum temperature This may be around 7°C higher compared to average summer temperatures now, with the potential to reach extreme temperatures as high as over 40°C with increasing frequency based on today's values.	Potential for increased waste reactions or fires involving heat sensitive or combustible waste.	1 Incoming waste should not combust when exposed to increased temperatures. Wastes are primarily non-combustible, such as inert soil and stones. .	1	1	N/A			
	Potential for fire if the temperature exceeds the heat rating of components in electrical equipment or components are subjected to intense and direct sunlight.	No electric services on site.			N/A			

Potential changing climate variable	**A** **Impact**	**B** **Likelihood**	**C** **Severity**	**D** **Risk** (B x C)	**E** **Mitigation** (what will you do to mitigate this risk)	**F** **Likelihood** (after mitigation)	**G** **Severity** (after mitigation)	**H** **Residual risk** (F x G)
	Potential increase in high temperature expansion and stress of plant, pipework and fittings. UV degradation of plastic pipes and hoses causing them to fail.	1 All pipework is subject to inspection and preventative maintenance programmes are carried out covering site infrastructure, plant and equipment including the inspection of plastic pipes and hoses.	2	2	Review of plant, pipework and fittings at risk of heat exposure to be carried out prior to hotter months. Increased inspections of plant, pipework and fittings at risk of heat exposure to be carried out during hotter periods.	1	1	1

Potential changing climate variable	**A** **Impact**	**B** **Likelihood**	**C** **Severity**	**D** **Risk** (B x C)	**E** **Mitigation** (what will you do to mitigate this risk)	**F** **Likelihood** (after mitigation)	**G** **Severity** (after mitigation)	**H** **Residual risk** (F x G)
	Potential increased dust emissions from processing areas, stockpiled material and site roads. Reduced availability of water for dust suppression.	1 Incoming wastes are potentially dusty waste streams that require water suppression upon arrival, treatment and storage on site. External storage areas require some dust control or dampening to reduce any dust emissions during dry periods. Haul roads are surfaced with concrete, these will be subject to regular monitoring and housekeeping as per the EMS procedures to prevent the suspension of any dust/debris.	2	2	Increase use of dust suppression system as needed during hot and dry weather. Preplanning to harvest and store water before a prolonged event of warm temperatures for dust suppression.	1	1	1

Potential changing climate variable	**A** **Impact**	**B** **Likelihood**	**C** **Severity**	**D** **Risk** (B x C)	**E** **Mitigation** (what will you do to mitigate this risk)	**F** **Likelihood** (after mitigation)	**G** **Severity** (after mitigation)	**H** **Residual risk** (F x G)
	Long periods of hot and dry weather could lead to a drought and may have an impact on water supplies for: • Dust suppression • Fire response	1 Processes carried out on site that may require water or dust suppression. Mains water available for use when required. External hydrants located outside of the site can be utilised for fire response.	2	2	Increase use of dust suppression system as needed during hot and dry weather. Crushing and screening activities limited during dry periods to reduce water usage. Preplanning to harvest and store water before a prolonged event of warm temperatures for dust suppression. Advice and guidance from the local FRS.	1	1	1

Potential changing climate variable	**A** **Impact**	**B** **Likelihood**	**C** **Severity**	**D** **Risk** (B x C)	**E** **Mitigation** (what will you do to mitigate this risk)	**F** **Likelihood** (after mitigation)	**G** **Severity** (after mitigation)	**H** **Residual risk** (F x G)
	Potential increased risk of pests and scavengers from stockpiled waste and increased temperature	1 Demolition wastes and C&D wastes such as soils and stones do not attract pests or give rise to odour. Greater vigilance for the identification of pests during hotter months, especially when carrying out site waste reception processes as a precaution.	1	1	N/A			

Potential changing climate variable	**A** **Impact**	**B** **Likelihood**	**C** **Severity**	**D** **Risk** (B x C)	**E** **Mitigation** (what will you do to mitigate this risk)	**F** **Likelihood** (after mitigation)	**G** **Severity** (after mitigation)	**H** **Residual risk** (F x G)
	Potential increased risk of wildfires impacting the site.	1 The site on industrial estate bounded by neighbouring businesses. No foliage located in the combustible storage area on site which may add to fire spread in the event of a wildfire.	2	2	Review risk of impact from any wildfires in the area annually prior to summer months.	1	1	1
2. **Winter daily temperature** This could be 4°C more than the current average with the potential for more extreme temperatures,	Slightly higher winter maximums could generate regular odour complaints and pest infestations.	1 Waste streams do not attract pests and are not an odorous waste.	1	1	N/A			

Potential changing climate variable	**A** **Impact**	**B** **Likelihood**	**C** **Severity**	**D** **Risk** (B x C)	**E** **Mitigation** (what will you do to mitigate this risk)	**F** **Likelihood** (after mitigation)	**G** **Severity** (after mitigation)	**H** **Residual risk** (F x G)
both warmer and colder than present.	Lower winter temperatures could result in an increased risk of pipes (or similar) freezing.	1 All pipework is subject to inspection and preventative maintenance programmes are carried out covering site infrastructure, plant and equipment including the inspection of plastic pipes and hoses.	2	2	Review of plant, pipework and fittings at risk of heat exposure to be carried out prior to hotter months. Increased inspections of plant, pipework and fittings at risk of heat exposure to be carried out during hotter periods.	1	1	1

Potential changing climate variable	A Impact	B Likelihood	C Severity	D Risk (B x C)	E Mitigation (what will you do to mitigate this risk)	F Likelihood (after mitigation)	G Severity (after mitigation)	H Residual risk (F x G)
3. Daily extreme rainfall Daily rainfall intensity could increase by up to 20% on today's values.	Potential for increased site surface water and flooding.	1 The site is not in a flood risk area. Heavier rainfall is more likely to cause short term flooding on site, overwhelming site surfaces and damage property and infrastructure. Heavy rain on site could cause the site to stop operations due to safety concerns for staff and plant usage.	2	2	Reduce site operations, cessation of waste acceptance periods of heavy rainfall, with consideration for site closure in the event of dangerous working conditions when handling wastes, vehicle movements or accessing operational areas where there is a risk of flood water building within the permitted area.	1	1	1
	There is potential for drainage systems to be overwhelmed.	1 Site has drainage systems within the permitted area.	2	2	Site surfacing maintained quarterly to prevent potholes and pooling water.	1	1	1

Potential changing climate variable	A Impact	B Likelihood	C Severity	D Risk (B x C)	E Mitigation (what will you do to mitigate this risk)	F Likelihood (after mitigation)	G Severity (after mitigation)	H Residual risk (F x G)
	Disruption to transport of waste and deliveries due to extreme weather with consequences for businesses, local authorities and householders who rely on waste collection services	1 Business is not reliant on external contractors and can control inputs and outputs accordingly to site.	2	2	Divert wastes to third party facilities to reduce impact on site and the requirement opening the site during a flood event.	1	1	1
	Key suppliers being impacted by climate change and ability to source key components elsewhere	Not applicable to the site			N/A			
	Heavy rainfall and pooling water can make car parks, pedestrian walkways and operational areas are dangerous for employees.	1 The permitted area could be subject to flash surface flood water impacting working areas.	2	2	Reduce site operations, cessation of waste acceptance periods of heavy rainfall, with consideration for site closure in the event of dangerous working conditions when handling wastes, vehicle movements or accessing operational areas where there is a risk of flood water building within the permitted area.	1	1	1

Potential changing climate variable	A Impact	B Likelihood	C Severity	D Risk (B x C)	E Mitigation (what will you do to mitigate this risk)	F Likelihood (after mitigation)	G Severity (after mitigation)	H Residual risk (F x G)
	Heavy rainfall and pooling water can make travel arrangements for access to and from work dangerous for employees.	2 Site surfacing maintained quarterly to prevent potholes and pooling water on hardstanding areas.	2	4	Pre workplace planning for employees who commute to work to understand if their journeys are likely to be impacted by winter weather. Discussions around working from home if the role allows or ensure staff can travel to and from the workplace safely during severe weather conditions.	1	1	1
4. Average winter rainfall Average winter rainfall may increase by over 40% on today's averages.	There is potential for drainage systems to be overwhelmed.	2 Site has drainage systems within the permitted area.	2	4	Reduce site operations, cessation of waste acceptance periods of heavy rainfall, with consideration for site closure in the event of dangerous working conditions when handling wastes, vehicle movements or accessing operational areas where there is a risk of flood water building within the permitted area.	1	1	1

Potential changing climate variable	A Impact	B Likelihood	C Severity	D Risk (B x C)	E Mitigation (what will you do to mitigate this risk)	F Likelihood (after mitigation)	G Severity (after mitigation)	H Residual risk (F x G)
	Disruption to transport of waste and deliveries due to extreme weather with consequences for businesses, local authorities and householders who rely on waste collection services	1 The business is not reliant on external contractors and can control inputs and outputs accordingly to site.	2	2	The company can look to can divert wastes direct to third party facilities to reduce impact on site and the requirement opening the site during periods of high rainfall.	1	1	1
	Key suppliers being impacted by climate change and ability to source key components elsewhere	N/A						
	Heavy rainfall and pooling water can make car parks, pedestrian walkways and operational areas are dangerous for employees.	1 The permitted area has maintained site drainage system. Carparks and site offices are located away from the permitted area reducing risk on site.	2	2	Reduce site operations, cessation of waste acceptance periods of heavy rainfall, with consideration for site closure in the event of dangerous working conditions when handling wastes, vehicle movements or accessing operational areas where there is a risk of flood water building within the permitted area.	1	1	1

Potential changing climate variable	A Impact	B Likelihood	C Severity	D Risk (B x C)	E Mitigation (what will you do to mitigate this risk)	F Likelihood (after mitigation)	G Severity (after mitigation)	H Residual risk (F x G)
	Heavy rainfall and pooling water can make travel arrangements for access to and from work dangerous for employees.	2	2	4	Pre workplace planning for employees who commute to work to understand if their journeys are likely to be impacted by winter weather. Discussions around working from home if the role allows or ensure staff can travel to and from the workplace safely during severe weather conditions.	1	1	1
5. Sea level rise Sea level rise which could be as much as 0.6m higher compared to today's level.	If a site is located near the coast there is potential increased risk of flooding.	Not applicable the site is not near the coast			N/A			

Potential changing climate variable	A Impact	B Likelihood	C Severity	D Risk (B x C)	E Mitigation (what will you do to mitigate this risk)	F Likelihood (after mitigation)	G Severity (after mitigation)	H Residual risk (F x G)
6. Drier summers Summers could see potentially up to 40% less rain than now.	Long periods of hot and dry weather could lead to a drought and may have an impact on water supplies for: processes and dust suppression	1 Site processes may require water during prolonged dryer periods to prevent dust emissions during waste processing.	2	2	Review water usage and utilise storage on site to pre store water ready for a warm weather event. Be aware of NWL information on droughts and advice of current supplies, such as Drought Orders to ban non-essential use. Fire Brigade may have further information for their approach to a drought. Keep up to date with their response to a fire during a drought in the local area, so the consequences can be understood.			
	Water supply could be limited due to drought conditions (Fire Water)	1 Hydrant located within 5m for the site entrance for fire response. Low levels of combustible wastes stored on site reducing fire risk.	1	1	N/A			

Potential changing climate variable	A Impact	B Likelihood	C Severity	D Risk (B x C)	E Mitigation (what will you do to mitigate this risk)	F Likelihood (after mitigation)	G Severity (after mitigation)	H Residual risk (F x G)
7. River Flow The flow in the watercourses could be 50% more than now at its peak, and 80% less than now at its lowest.	Increased impact from on-site drainage systems where they are connected to watercourses. The site is in flood zone 1, an area with a low probability of flooding. .	1 No drainage systems on site to impact on external water course. External site surfaces are maintained to prevent pooling water and potholes.	2	2	Subscriptions to Flood/MET office warnings to pre-empt any potential flood conditions that may impact the local water course.	1	1	1
8. Storms Storms could see a change in frequency and intensity. The unique combination of increased wind speeds, increased rainfall, and lightning during these events provides the potential for more extreme storm impacts	Potential for high winds to damage buildings and infrastructure and blow waste from the site impacting local receptors.	1 Limited infrastructure on site. External boundary fencing will help to contain any surrounding infrastructure that may move around due to high winds.	2	2	N/A			

Potential changing climate variable	**A** **Impact**	**B** **Likelihood**	**C** **Severity**	**D** **Risk** (B x C)	**E** **Mitigation** (what will you do to mitigate this risk)	**F** **Likelihood** (after mitigation)	**G** **Severity** (after mitigation)	**H** **Residual risk** (F x G)
	Potential for high winds to cause problems with stability of above ground storage areas. This poses a risk to staff attending site, and risk to staff and site infrastructure while transferring waste to and from site.	1 Waste stockpiles stored externally at height. Risk to employees in working areas during high winds where debris both on and off site may cause injury.	2	2	Reduce stockpile height to prevent wind whipping of materials around and off site. Pre workplace planning for employees who commute to work to understand if their journeys are likely to be impacted by storm conditions. Discussions around working from home if the role allows or ensure staff can travel to and from the workplace safely during severe weather conditions. Reduce site operations, cessation of waste acceptance/removal during storm conditions, with consideration for site closure in the event of dangerous working conditions when handling wastes.	1	1	1

Potential changing climate variable	**A** **Impact**	**B** **Likelihood**	**C** **Severity**	**D** **Risk** (B x C)	**E** **Mitigation** (what will you do to mitigate this risk)	**F** **Likelihood** (after mitigation)	**G** **Severity** (after mitigation)	**H** **Residual risk** (F x G)
	Potential for lightning strikes to damage buildings and infrastructure.	2 Limited site infrastructure on site.	2	4	Assess the potential and impact of lightning strikes on buildings, equipment and plant. Assess the need to install lightning conductors.	1	1	1

9. Resilience for 2050 and 2100

The company are aware that a sustainable future is a key priority. Future planning will be based on the latest information regarding climate change on an annual basis. Long-term mitigation has been considered against the latest figures as laid out in the table below.

The climate change data below is taken from research presented by the MET Office and the BBC and published in August 2022.

The website is titled 'What will climate change look like near me?'

What will climate change look like in your area? - BBC News – **TS2 1DW**

The data is used here to summarise the changes expected for a rise of 2°C and 4°C in Middlesborough for 2050 and 2100 to provide an idea of the mitigation that will be considered.

Table 5 – Resilience for increase in temperature and rainfall by 2050 and 2100

	Present Day (Current data: 1991-2019)	2°C as predicted 2050	4°C as predicted 2100	Mitigation
Hottest Day in Summer	31.6°C	33.4°C	37.7°C	The impact of heat on staff is always a consideration. The type of the working environment must be carefully chosen to properly meet the needs of staff whilst being as efficient as possible. Adapting working patterns, relaxing work attire without undermining PPE requirements and provision of additional breaks.
Summer days over 25°C	1 days on average per month	3 day on average per month	9 days on average per month	
Winter Days	18.5°C	18.3°C	19.8°C	Milder winters may reduce the cost of heating offices and welfare areas. Savings made can be reinvested on site on cleaner technologies.
Rainy Days - Summer	10 days on average per month	9 days on average/month	8 days on average/month	Mitigation for drought will need to improve year-on-year, with less rain in the summer the further review of the use of water on site, and identification of water harvesting rainwater storage for the site may be beneficial. As rainfall is expected to be more intense, heavy summer
Rainy Days - Winter	12 days on average per month	No change	No change	
	68 mm	76 mm	75 mm	

Wettest Day - Summer	on wettest summer day	on wettest summer day	on wettest summer day	downpours can increase the risk of mud on site. Waste containment, yard housekeeping, and improving infrastructure year-on-year will be essential, with a view to containing as many activities under cover as possible. Continued investment in maintenance to protect buildings, plant, and vehicles from the effects of heavy storms and unpredictable weather.
	32mm	39mm	37mm On wettest winter day	
Wettest Day - Winter	on wettest winter day	On wettest winter day		
Total winter rainfall 2019	200mm	No change	Slightly wetter winters with a 10% increase	

APPROPRIATE MEASURES

Non Hazardous and Inert Wastes

A Buckler Haulage Ltd

Land/premises At

Lloyd Street

Middlesbrough

Cleveland

TS2 1DW

Olive Compliance Ltd
Planet House
Northumbrian Way
Killingworth
NE12 6EH
Company Number:12861220

CONTENTS

1.0 GENERAL MANAGEMENT APPROPRIATE MEASURES 3

2.0 WASTE PRE-ACCEPTANCE, ACCEPTANCE AND TRACKING 25

3.0 WASTE STORAGE 38

4.0 WASTE TREATMENT.....42

5.0 EMISSIONS CONTROL.....46

6.0 EMISSIONS MONITORING AND LIMITS 68

7.0 PROCESS EFFICIENCY APPROPRIATE MEASURES.....72

8.0 WASTE MINIMISATION, RECOVERY AND DISPOSAL.....78

1.0 General Management appropriate measures

These are appropriate measures for the environmental management of a regulated facility permitted to store, treat or transfer (or both) non-hazardous and inert waste.

2.1 Management System	
1. You must have an up-to-date written management system, and activities at your facility must follow it. Your management system must incorporate the following features. You have: • management commitment, including from senior managers • an environmental policy that is approved by senior managers and includes the continuous improvement of the facility's environmental performance, so you can identify pollution risks and minimise them through appropriate measures You plan and establish the resources, procedures, objectives and targets needed for environmental performance alongside your financial planning and investment. You implement your environmental performance procedures, paying particular attention to: • staff structure and relevant responsibilities	BHL Management are committed to the implementation and use of AM techniques over all aspects of the business with particular focus on the Environment. Management strives to continually improve by developing and committing to the establishment and further development of an Environment Management System (EMS). Senior Management of BHL strives to: • Operating in compliance with all permit requirements and relevant legislation • Considering the environmental impacts of all operations • Striving to minimise waste and energy where possible The company is working towards ISO accreditation with the EMS Manual and Quality, Environmental and Safety policies setting out company philosophies and responsibilities. The Emergency Action Plan contains Standard Operating Procedures for emergency situations: Fire/Explosion. Electrical Failure. Mechanical Failure. Oil/Fuel/Chemical Spillage. External flood. Serious Injury.

• staff recruitment, training, awareness and competence • communication (for example of performance measures and targets) • employee involvement • documentation • effective process control • maintenance programmes • management of change • emergency preparedness and response • making sure you comply with environmental legislation You check environmental performance and take corrective action, paying particular attention to: • monitoring and measurement • learning from incidents, near misses and mistakes, including those of other organisations • records maintenance • independent (where practicable) internal or external auditing of the management system	Lightning Strike. In accordance with the Accident Management Procedure, it is the responsibility of all staff to report incidents, including near misses to their line of report or Senior BHL Manager as soon as possible. Senior BHL Managers are responsible (with support from the HS Manager) for undertaking investigations following incidents. The level of investigation will be determined by the severity or potential of the incident, in accordance with the details in the Accident and Incident Reporting and Investigation Management Procedure. Any changes to procedures are made in accordance with Document Control Procedure. The site has dedicated spill procedures in place. Record of any accidents, incidents, near misses, changes to procedures, abnormal events and the findings of any maintenance inspections. The company conduct investigations will be carried out where appropriates and the EA will be contacted immediately if any event takes place that may cause significant pollution. The company have the below in place : • Climate Risk Procedure • Fire Prevention Plan • Dust and Emissions Management Plan • Odour Management Plan • Contingency Plans

to confirm it has been properly implemented and maintained Senior managers must review the management system to check it is still suitable, adequate and effective at least annually. Improvements should be carried out within a reasonable time, based on the level of environmental risk. You review the development of cleaner technologies and their applicability to site operations. We would expect cleaner technologies to be considered: • as a result of substantiated pollution incidents • when reviewing management systems • when planning investment decisions, for example new items of plant When designing new plant, you must assess the environmental impacts from the plant's operating life and eventual decommissioning. You must make sure that new plant is authorised by your environmental permit. You must have a written procedure for proposing, considering and approving changes to procedures or infrastructure related to storing or treating waste or pollution control. This is so you can track and control the process of change.	

You consider the risks that a changing climate poses to your operations. You have appropriate plans in place to assess and manage future risks. You compare your facility's performance against relevant sector guidance and standards on a regular basis, known as 'sectoral benchmarking'. You have and maintain the following documentation as part of your management system: • inventory of emissions to air and water • residues management plan • accident management plan • site infrastructure plan • site condition report for new facilities or where you are increasing the facility's area • odour management plan, if required • noise and vibration management plan, if required • dust, mud and litter management plans, if required • pest management plan, if required • fire prevention plan, unless your facility does not handle combustible waste	

• climate change risk assessment and adaptation plan Your management system must include a schedule of inspection and maintenance for all pollution control infrastructure, including for example the: • impermeable surfacing and drainage system • ducts of abatement systems You must have a document control procedure that clearly describes how and when you will periodically review documentation and maintain version control. Your management system must clearly set out the actual physical capacity of your facility to store and handle waste, which may be less than the quantity limits allowed by your permit. You must specify limits for the maximum: • waste storage capacity at any one time • daily and annual throughputs • residence time for waste When doing this, you must take into account the characteristics of your facility and the waste types and the pollution risks, for example fire and odour. Your limits must also reflect the constraints of the available space and waste handling processes. You must include factors like seasonal changes in supplies of inputs, and markets for outputs. More	

information on understanding capacity is available in our RGN 2 guidance.	
2.2 Staff Competence	
1. Your facility must be operated at all times by an adequate number of staff with appropriate training, qualifications and competence. You must keep records of training, qualifications and relevant experience.	The design, installation and maintenance of the site have been carried out by competent people. The site will continue to be manned and operated by appropriately trained site operatives. The BHL Management team have the relevant WAMITAB qualifications for the operations on site.

2. If you operate a 24-hour process, you must have: • remote or telemetric systems to make sure an alarm would be raised in the event of an incident during unmanned hours • appropriate personnel on call to deal with these incidents You must explain these procedures in your management system. 3. The design, installation and maintenance of infrastructure, plant and equipment must be carried out by competent people, including Construction Quality Assurance where appropriate. 4. You must have appropriately qualified managers for your waste activity who are members of a government approved technical competence scheme and who attend the facility as set out in our attendance guidance.	The site is monitored 24 hours a day. Any member of site staff or site security out of hours will raise the alarm in the event of an incident.
5. Staff carrying out waste acceptance checks, including sampling and analysis of waste, must be appropriately trained and competent to: • classify and characterise waste properly • identify whether it is suitable for your facility • manage any loads that do not conform to waste acceptance criteria • determine end of waste products	The waste types to be accepted on site are non-hazardous and limited hazardous waste streams. Wastes will come from demolition, commercial, industrial and household sources. Other suppliers may be required to provide representative samples/or analysis and assessment before BHL confirm acceptance ensuring that their composition is known and that they are appropriate for acceptance then treatment if required. BHL staff will require that samples of waste are representative, i.e. considering any variation in waste. Waste samples will be obtained by a person who is technically competent to undertake the sampling process.

2.3 Accident Management Plan	
1. As part of your written management system you must have a plan for dealing with any incidents or accidents that could result in pollution, including near misses.	The site operates with an Emergency Plan and an Accident Management Plan.
2. The accident management plan must identify and assess the risks the facility poses to human health and the environment. Particular areas to consider may include: • waste types • transferring substances, for example filling (including overfilling) or emptying of vessels and containers • preventing incompatible substances coming into contact with each other • failure of plant and equipment, for example storage tanks and pipework, or blocked drains • failure of containment, for example bund failure or drainage sumps overfilling • making the wrong connections in drains or other systems • failure to contain firefighting water	The site operates with an Emergency Plan and an Accident Management Plan. BHL have a 24hr monitoring programme on site, through as combination of onsite presence, monitored alarm systems, and CCTV cameras. Buildings are protected by a fire detection system; personnel are trained in the fire procedure, and firefighting equipment is provided throughout the facility. Spill kits are available in relevant locations throughout the facility. Any emissions from accidents / spillages etc are cleared by trained staff, using spill kits which are available throughout the site. Incidents and accidents are reported through the relevant reporting system and investigated by the management team. Results are discussed at regular meetings and any necessary improvements to procedures or equipment are agreed and implemented. Necessary changes are made and communicated to the workforce. Staff are fully trained with induction, formally certified training and refresher training conducted annually.

• failure of abatement systems • hazardous atmospheres in confined spaces • failure of main services, for example power, steam or cooling water • checking the composition of effluents before their emission • vandalism and arson • operator error • accessibility of control equipment in emergency situations • extreme weather conditions, for example flooding or very high winds 3. You must assess the risk of accidents and their possible consequences. You can use our risk assessment guidance to help you to do this. Risk is the combination of the likelihood that a hazard will occur and the severity of the impact resulting from that hazard. Having identified the hazards, you can assess the risks by addressing six questions: • how likely is it that the accident will happen? • what may be emitted and how much? • where will the emission go – what are the pathways and receptors?	

• what are the consequences? • what is the overall significance of the risk? • what can you do to prevent or reduce the risk?	
4. The depth and type of accident risk assessment you carry out will depend on the characteristics of your facility and its location. The main factors to take into account are the: • scale and nature of the accident hazard presented by the facility and its activities • risks to areas of population and the environment (the receptors) 5. Through your accident management plan, you must also identify the roles and responsibilities of the staff involved in managing accidents. You must provide them with clear guidance on how to manage each accident scenario, for example as a result of a spillage of a potentially polluting liquid.	The site operates with an Emergency Plan and an Accident Management Plan.
6. You must have a suitably trained facility employee available at all times who will act as an emergency coordinator and will take lead responsibility for implementing the accident management plan.	The site operates with an Emergency Plan and an Accident Management Plan.

7. You must train your employees so they can perform their duties effectively and safely and know how to respond to an emergency	
8. You must also: • show how you will communicate with relevant authorities, emergency services and neighbours (as appropriate) before, during and after an accident • implement emergency procedures, including for safe plant shutdown and site evacuation • implement post-accident procedures that include carrying out an assessment of the harm an accident may have caused, and the remediation actions you will take • consider the impact of accidents on the function and integrity of plant and equipment • have contingency plans to relocate or remove waste from the facility, and suspend incoming waste • test the accident management plan by carrying out emergency drills and exercises	The site operates with an Emergency Plan and an Accident Management Plan.
9. After a flooding event you must inspect and assess the integrity of affected plant and equipment, in particular infrastructure that may have been in contact with floodwater or groundwater. Tank	The site operates with an Emergency Plan and an Accident Management Plan.

inspections should include non-destructive testing methods to verify their integrity.	
10. You must take the following measures, where appropriate, to prevent events that may lead to an accident. You must have appropriate procedures set out in your accident management plan.	The site operates with an Emergency Plan and an Accident Management Plan.
Preventing accidental emissions 11. You must make sure that you contain the following (where appropriate) and route to the effluent system (where necessary and lawful): • process waters • site drainage waters • emergency firefighting water • chemically contaminated waters • spillages 12. You must have planned for how you will manage the impacts of tidal surges and storm water flows. You must consider abnormal operating scenarios and incidents, for example, by providing buffer storage capacity. You should take into account the: • nature of the pollutants • potential pathways	The site operates with an Emergency Plan and an Accident Management Plan.

• effects of downstream wastewater treatment • sensitivity of the receiving environment	
13. If buffer storage capacity is required, you can only discharge from it after you have assessed the water for contamination, in order to identify an appropriate disposal route.	The site operates with an Emergency Plan and an Accident Management Plan.
14. You must implement spill contingency procedures to minimise the risk of an accidental spill entering watercourses or sewers or contaminating land.	The site has Spill Procedures, equipment and training in place. SOP 3.18
15. You must take account of additional firefighting water flows or firefighting foams, as set out in our fire prevention guidance. You may need infrastructure like emergency storage lagoons to prevent contaminated firefighting water from reaching a receiving water body.	The site has an EA Approved FPP which considers POPS and pollution risks.
16. You must consider and, if appropriate, plan for the possibility that you may need to contain or abate accidental emissions from: • overflows • tank failures • tank wall penetrations • site plant or machinery leaks	The site has Emergency Plans and Procedures, equipment and training in place. SOP 3.1

• **Security measures** You must have security measures (including staff) to prevent unauthorised access to your facility, so preventing: • damage to equipment • theft • illicit dumping and fly-tipping • arson 17. Depending on your risk assessment, facilities must use an appropriate combination of: • security guards • total enclosure (usually with fences) • controlled entry points • lighting • warning signs • 24 hour surveillance, such as CCTV	The site has Security Measures, procedures and out of hours security in place. SOP 3.7
Fire prevention 18. If your permit allows you to store or treat combustible waste, you must have a fire prevention plan that meets the requirements of our guidance.	The site has an EA Approved FPP.

Other accident prevention measures 19. You must maintain plant control in an emergency using one or a combination of: • alarms • trips and interlocks • automatic control systems • tank level readings such as ultrasonic gauges, high level warnings, process interlocks and process parameters	The site has an Accident and Emergency Procedures in place.
20. You must: • make sure that all the measurement and control devices you would need in an emergency are easy to access and operate in an emergency situation • maintain plant in a good state through a preventive maintenance programme and a control and testing programme • use techniques such as suitable barriers to prevent moving vehicles damaging equipment • implement procedures to avoid incidents due to poor communication between	The site has an Accident and Emergency Procedures in place.

operating staff – during shift changes and following maintenance or other engineering work	
Record keeping and procedures 21. You must: • keep an up to date record of all accidents, incidents, near misses, changes to procedures, abnormal events, and the findings of maintenance inspections • carry out investigations into accidents, incidents, near misses and abnormal events and record the steps taken to prevent their reoccurrence • maintain an inventory of substances which are present (or likely to be) and which could have environmental consequences if they escape	The company have record keeping and procedures in place with an automated tracking of audits, inspections, defects and non-compliances in place including close offs.
22. You must notify the Environment Agency without delay if you detect any of the following events and they are causing, or may cause, significant pollution: • a malfunction • a breakdown or failure • an accident	The company will keep the below records along with all waste duty of care records. • Permits/exemptions issued to the site; • other legal requirements; • risk assessments; • copies of the management system and associated plans; • health and safety records; • all operating procedures;

• emission of a substance not controlled by an emissions limit • breach of an emissions limit	• staff competence and training records; • emissions and any other monitoring undertaken if required; • compliance checks, findings of investigation and actions taken; • complaints made, findings of investigation and actions taken; • audits of management system, findings (reports) and actions taken; • management reviews and changes made to the management system; • waste returns In the event of an emergency, the occupants of neighbouring properties will be contacted and advised of the incident, its severity and contingency arrangements that may include evacuation. In all cases after an event, an Accident and Incident Record is completed. An investigation may be carried out by the Operator/Site management or other designated person. The incident will be reported to the relevant authorities including: • Environment Agency (Schedule 5) • Health & Safety Executive • Nothumbrian Water
2.4 Contingency Plans and Procedures	
1. You must implement a contingency plan so that you: • comply with all of your permit conditions and operating procedures during maintenance or shutdown at your facility, including disruption at other facilities that would affect supplies to your facility or the removal of waste from it	The site has a site specific Contingency Plan in place SOP 3.23 refers This covers accidents, emergences, shutdowns, power failures and cyber attacks

• do not exceed limits in your permit and 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 capacity	
2. 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 to which you send waste.	The site has a site specific Contingency Plan in place SOP 3.23 refers
3. You must make your contracted or regular customers are aware of your contingency plan and of the circumstances in which you would stop accepting waste from them.	The site has a site specific Contingency Plan in place SOP 3.23 refers
4. You must consider whether the sites or companies you rely on in your contingency plan: • can take 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	The site has a site specific Contingency Plan in place SOP 3.23 refers
5. If you could exceed your permitted limits, or compromise your storage or handling procedures, you must not discount alternative disposal or recovery options on the basis of extra cost or geographical distance.	The site has a site specific Contingency Plan in place SOP 3.23 refers
6. You must not include unauthorised capacity in your contingency plan. If your contingency plan	The site has a site specific Contingency Plan in place SOP 3.23 refers

includes using temporary storage for additional waste at your facility, then you must make sure that your facility is authorised for this storage and you have the appropriate infrastructure in place.	
Contingency measures for treatment only 7. Your management procedures and contingency plan must: • identify your technology's known or predictable malfunctions and the procedures, spare parts, tools and expertise needed to deal with them – so you can minimise predictable malfunctions and fix them quickly • include a record of spare parts held, especially critical spares, or state where you can get them from and how long it would take • have a defined procedure to identify, review and prioritise items of plant which need a preventative regime • include all equipment or plant whose failure could directly or indirectly affect the environment or human health – if the equipment or plant is process critical then you may need to stop accepting waste or shut down your process	The site has a site specific Contingency Plan in place SOP 3.23 refers

• make sure you have the spare parts, tools, and competent staff needed before you start maintenance	
8. If you produce an end-of-waste material, your contingency planning must consider storage capacity for end-of-waste products and materials that fail the end-of-waste specification.	The company produce end of waste aggregates on site. The company WRAP protocol covers the management of the production process, storage and batch failures.
9. Your management system must include procedures for auditing your performance against all of these contingency measures and for reporting the audit results to the site manager.	SOP 3.8 covers the inspection and audit process for the site. Daily checks cover various aspects of daily site management such as: • Operational Plant Capability • Buildings and surfacing • Drainage inspections • Plant and equipment • Breakdowns (critical processing plant/mobile plant) • Complaints • Amenity checks (dust/litter/noise/odour/pests and noise) • Stockpile management and Fire Prevention • Environmental impact prevention • Pollution Prevention Equipment (spill kits/dust netting) • Fire Prevention Measures • Accidents • Security Measures (eg: fencing/cctv) • Reporting • Recording (eg: non-conformances) • Staff levels • Storage of hazardous materials • TCM cover • Weather conditions

	If there are any issues identified not in the scope of the inspection checklist, these comments will also be recorded in the site electronic monitoring diary and addressed. Monthly health and safety and environmental audits are also carried out covering other site activities and controls.
2.5 Facility Decommissioning	
1. You must consider the decommissioning of the facility at the design stage and make suitable plans to minimise risks during decommissioning. 2. For existing facilities where potential risks are identified, you must implement a programme of design improvements. These design improvements must make sure that you: • avoid using subsurface tanks and pipework • drain and clean out vessels and pipework before dismantling • use insulation which you can remove easily without dust or hazard • use recyclable materials, taking into account operational or other environmental objectives	All decommissioning undertaken on site will be undertaken in accordance with a detailed decommissioning plan and associated procedures to protect the environment and receptors. The sites Site Condition Report (v1) will also be updated to reflect any decommissioning activities undertaken on site. The SCR has been prepared in accordance with the below: Environmental permitting: H5 Site condition report - GOV.UK

3. You must maintain a decommissioning plan to demonstrate that: • plant can be decommissioned without causing pollution • the site will be returned to a satisfactory condition 4. You should identify non-productive or redundant items such as tanks, pipework, retaining walls, bunds, reusable waste containers, ducts, filters and security systems and implement a programme of decommissioning and removal. 5. You should follow our guidance on how land and groundwater should be protected at permitted facilities. You should plan for producing a site condition report, if needed to surrender your permit.	All decommissioning undertaken on site will be undertaken in accordance with a detailed decommissioning plan and associated procedures to protect the environment and receptors.

2.0 Waste pre-acceptance, acceptance and tracking

These are appropriate measures for waste pre-acceptance, acceptance and tracking at a regulated facility permitted to store, treat or transfer (or both) non-hazardous and inert waste.

3.1 Waste Pre Acceptance	
1. You must implement waste pre-acceptance procedures so that you know enough about a waste (including its composition) before it arrives at your facility. You need to do this to assess and confirm that the waste is technically and legally suitable for your facility. If you accept the waste, you must keep records to justify your decision. Your pre-acceptance procedures must follow a risk-based approach, considering: • the source and nature of the waste • potential risks to process safety, occupational safety and the environment (for example from odour and other emissions) • knowledge about the previous waste holder(s)	All incoming waste is subject to pre-acceptance checks in accordance with the sites pre-acceptance procedure which meets the necessary requirements of the appropriate measure's guidance. SOP 3.2 refers. All incoming waste is subject to waste acceptance checks in accordance with the sites dedicated waste acceptance procedure SOP3.2 which meets the necessary requirements of the appropriate measure's guidance, including 3rd party audits, sampling and rejection procedures.
2. Some facilities receive waste on an ad hoc basis. In those instances, pre-acceptance checks can still be carried out before the waste is accepted. For example, through the exchange of information at the weighbridge before acceptance on site.	SOP 3.2 refers.
3. When you receive a customer query, and before the waste arrives at your facility, you must get	SOP 3.2 refers.

enough information from the waste producer to satisfy yourself that the waste has been properly assessed and classified as set out in WM3.	
4. In the case of household and similar non-household waste (including skip waste) waste is pre-accepted by the terms and conditions of the contract in place (for example skip waste companies excluding fridges and freezers or hazardous wastes). There should also be a visual pre-acceptance check before removal from the producer's premises.	All incoming waste is subject to pre-acceptance checks in accordance with the sites pre-acceptance procedure which meets the necessary requirements of the appropriate measure's guidance. Precontract discussions are made at the time of the customer enquiry and upon attending the customer address with the was checked prior to final collection and removal. WM3 is used to classify waste streams including mirror entry wastes.
5. For commercial and industrial waste, you must get the following information in writing or electronic form: • details of the waste producer including their organisation name, address and contact details • a description of the waste • the waste classification code (also referred to as a List of Waste (LoW) or European 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 • information about the history of the producer site if it may be relevant to the	

classification of the waste (for example soils and other construction and demolition arisings from a site contaminated by previous industrial uses) • the waste's physical form • the waste's composition (based on representative samples if necessary) • a description of the waste's odour and whether it is likely to be odorous • an estimate of the quantity you expect to receive in each load and in a year For mirror entry LoW codes (as defined in WM3), you must keep the evidence that you have made an assessment of the waste to assign the relevant mirror entry code.	
6. You do not need to have sample information if the origin of the waste is reliably understood and it clearly shows that the waste is non-hazardous. However, a visual assessment alone will not be enough to assess whether mirror entry waste is hazardous or not.	SOP 3.2 refers.
7. If the waste is a mirror entry and has not been properly assessed, you must assume it is the hazardous entry as a precautionary measure. This is likely to mean that you cannot accept it at your facility. The pre-acceptance information should be verified by contacting or visiting the producer.	

Dealing with staff directly involved in waste production can help to fully characterise a waste.	
8. Analysis of samples must be carried out by laboratories who are UKAS or MCERTs accredited for the prescribed test.	SOP 3.2 refers.
9. After a waste has been properly assessed and classified, you must technically assess the waste's suitability for storage and treatment at your facility to make sure you can meet your permit conditions. You must make sure that the waste complies with your facility's treatment capabilities and you are permitted to take that waste.	
10. You must keep pre-acceptance records for at least 3 years, with records preferably held electronically, following receipt of the waste. If an enquiry does not lead to receipt of the waste, you do not need to keep records.	
11. You must reassess the information required at pre-acceptance if the: • waste changes • process giving rise to the waste changes • waste received does not to conform to the pre-acceptance information In all cases you must reassess the information required at pre-acceptance on an annual basis.	

12. When you agree that you will accept waste from a customer, you should decide and record what parameters you will check at the acceptance stage. The checks could be visual, physical, chemical and odour-based parameters. You must also record the criteria for non-conformance or rejection. The person checking the waste for acceptance can also decide on their own additional parameters.	
3.2 Waste Acceptance	
1. You must implement waste acceptance procedures to check that the characteristics of the waste received matches the information provided to you during waste pre-acceptance. This is to confirm the waste is as expected and that you can accept it. If the waste does not conform to the pre-acceptance information, you may still be able to accept the waste, but you must confirm first that your permit allows it and that your facility can handle it appropriately. Otherwise, you must reject the waste.	All incoming waste is subject to waste acceptance checks (SOP 3.2) in accordance with the sites dedicated waste acceptance procedure which meets the necessary requirements of the appropriate measure's guidance. The following procedures outline the pre-acceptance and acceptance measures that will be followed at all times. Waste shall only be accepted. (a) it is of a type listed within the permit; (b) it conforms to the description in the documentation supplied by the producer and holder; (c) it is visually inspected on arrival and before it enters the treatment process to ensure that it complies with the permit. Records demonstrating compliance for the acceptance of permitted wastes shall be maintained. Rejection procedures are in place (SOP 3.3)
2. Your procedures should follow a risk-based approach, considering: • the source, nature and age of the waste	SOP 3.2 refers.

• potential risks to process safety, occupational safety and the environment (for example, from odour and other emissions) • the potential for self-heating • knowledge about the previous waste holder(s)	
3. When deciding whether to accept waste, you must also check that the relevant storage areas and treatment processes in your facility have the physical capacity needed to handle the waste. You must not accept waste if this capacity is not available, or if you would breach your permit by doing so.	SOP 3.2 refers.
4. You must visually check wastes and verify them against pre-acceptance information and transfer documentation before you accept them on site. The extent of the initial visual check is based on the waste type and how it is packaged.	SOP 3.2 refers.
5. You must check and validate all transfer documentation and resolve discrepancies before you accept the waste. If you believe the incoming waste classification or description is incorrect or incomplete, then you must address this with the original waste producer or waste carrier (or both) during waste acceptance. You must record any non-conformance. If you have assessed the waste as	SOP 3.2 refers.

acceptable for on-site storage or treatment, you must document this.	
6. You must have clear criteria that you use to identify non-conforming wastes and wastes to be rejected. You must also have written procedures for recording, reporting and tracking non-conforming and rejected wastes. These must include: • using quarantine storage • notifying the relevant customer or waste producer • recording a summary of your justification for accepting non-conforming waste in your electronic (or equivalent) system You must take measures to prevent the recurrence of non-conforming and rejected wastes.	SOP 3.2 refers.
7. Where you reject waste which has been classified as hazardous, you must follow the procedure set out in our rejected loads guidance.	See Waste Rejection Procedure SOP3.3
8. You must weigh each load of waste on arrival to confirm the quantities against the accompanying paperwork, unless alternative reliable and representative systems are available (for example, based upon density and volume). You must record the weight in your electronic or equivalent systems, so you can monitor available capacity at your facility. Records of incoming waste are not required for	All loads are weighed upon entrance and exit from the site vis the weighbridge. The weight of waste received and dispatched is recorded and printed on the Waste Paperwork (Weighbridge Ticket, Waste Transfer Note or Consignment Note). BHL retain all Waste Paperwork for all received and dispatched waste as required by the permit and generate accurate Waste Returns. The precision and accuracy of a weighbridge is a matter for Weight and Measure Regulations enforced by HM Revenue and Customs and Trading Standards so is beyond the requirements of waste

waste from householders deposited at Household Waste Recycling Facilities.	management legislation. Under this regime the weighbridge must be precise and accurate at the time of testing.
9. The person carrying out waste acceptance checks must be trained to effectively identify and manage any non-conformances in the loads received, so you comply with your Duty of Care for waste and your permit conditions.	All waste is fully inspected upon receipt by trained operatives and visual checked at the weighbridge.
10. Your procedures must make sure that your staff watch waste being unloaded, so you can quarantine the waste if necessary before it is mixed with other material.	All waste is fully inspected upon receipt.
11. Offloading and reception areas must have an impermeable surface with self-contained drainage, to prevent any potentially polluting liquid from escaping off site. This requirement does not apply if your facility's permit allows only inert wastes and does not require impermeable surfacing with self-contained drainage.	All combustible waste is received on impermeable surface with sealed drainage. Soils, stones and uncontaminated metals are stored on hardstanding.
3.3 Quarantine	
1. Your facility must have a dedicated waste quarantine area or areas which you use to temporarily store waste being rejected, or non-conforming waste whilst it is being assessed. Quarantine areas must have impermeable surface	The site benefits from a dedicated quarantine area (waste) for non-conforming loads. The Fire quarantine area is located in a dedicated area, the area may be subject to vehicle traffic during general operations, it will be cleared as necessary in the event of a fire. Non-compliant waste being identified within the waste load, the vehicle will be requested to remove the load off site immediately. If the vehicle has already deposited the waste, it will be moved to the

with self-contained drainage if there is a risk of contaminated runoff from the quarantined waste	dedicated quarantine area and removed off site within 48 hours (pending availability of receiving sites or any testing requirements. In the event of a fire, with best endeavours, the burnt waste will be removed off site within 48 hours pending availability of receiving sites or any testing requirements.
2. Where there is a risk of fugitive emissions from quarantined waste you must store it in closed or covered containers or within a building.	Any quarantined contaminated wastes that may cause emissions should be sheeted or stored in a covered skip/container or in a building to prevent rainfall or wind from mobilising pollutants.
3. Quarantine storage must be separate from all other storage and clearly marked as a quarantine area.	Quarantine storage (waste) is separate from all other storage and clearly marked as a quarantine area.
4. You should store the waste in quarantine in closed containers or cover it to prevent emissions if appropriate. For example, you should sheet quarantined contaminated soil or store it in a covered skip to prevent rainfall or wind from mobilising pollutants.	Any quarantined contaminated soils or stone should be sheeted or stored in a covered skip/container to prevent rainfall or wind from mobilising pollutants.
5. You must have written procedures for dealing with wastes held in quarantine, including a maximum storage volume. The maximum storage time must take account of the potential for odour generation, pest infestation and storage conditions. If the waste is infested or odorous you must remove it within 24 hours or sooner.	If waste is found to be non-conforming, the following procedure is to be followed; 1. Notify the relevant EA officer(s) of significant loads as soon as is practicable; 2. If the carrier's vehicle is still present, the waste should, wherever possible, be reloaded back onto the carrier's vehicle/ or refused and returned to the member of the public; 3. If the material is reloaded onto the carrier's vehicle: the office of the carrier should be notified by telephone; the details including time of call and contact name are to be recorded in the Site Diary (or other recording system); and a copy of the Waste Rejection Record is to be retained;

	4. If the carrier or customer has departed the site, and if it is considered safe to do so, the waste is to be photographed where possible, placed in the quarantine area pending the outcome of further investigations; 5. If the waste is of unknown composition, it is to be isolated at the operational area pending further investigations. This is to be achieved by the placement of cones or other barriers around the waste; 6. Further investigations may include contact with the carrier/customer and the producer to seek to determine the likely composition of the waste. These investigations are to be undertaken by the Site Manager/TCM or another designated person; 7. If the waste is confirmed as not being permitted for recovery at the site, the waste is to be directed to an alternative, suitably licensed facility; and 8. Wherever possible, rejected waste is to be removed from the site within 48 hours of receipt at the site; however, identification of suitable disposal facilities may result in the waste being stored for a longer period prior to removal from the facility (e.g. contaminated soils /unknown liquids) SOP 3.3 refers
3.4 Waste Tracking	
1. You should use an electronic or equivalent system to hold up-to-date information about the available capacity of different parts of your facility, for example reception, quarantine, treatment and storage areas. If you do not have an electronic system, you still need to hold the equivalent level of information. You should use a pre-booking system to make sure that you have enough waste storage and process capacity for the incoming acceptable waste. Your electronic or equivalent system must hold all the information generated during:	The site operates a computerised waste tracking system which meets the requirements detailed within the appropriate measures. The system ensures that no storge or process capacities with tracked inputs and outputs reports ran daily. The system records all information during the waste pre-acceptance, acceptance and rejection procedures. The system is used as daily inventory and stock control system. All records will be kept for a minimum of 3 years.

• pre-acceptance • acceptance • non-conformance or rejection • storage • repackaging • treatment • removal off site This information must be readily accessible.	
2. You must create records and update them to reflect deliveries, on-site treatment and despatches. Your tracking system will also operate as a waste inventory and stock control system, including both wastes and end-of-waste materials produced at your facility. It must include this information as a minimum: • the date the waste arrived on site • the original producer's details (or unique identifier) • a unique reference number • waste pre-acceptance and acceptance information • the package type and size	As above

• the intended treatment or disposal route • the nature and quantity of wastes held on site • where the waste is physically located on site • where the waste is in the designated recovery or disposal process • identifying the staff who have taken any decisions about accepting or rejecting waste streams and who have decided on recovery or disposal options • details that link waste to relevant transfer notes • details of any non-conformances and rejections, including consignment notes for waste rejected because it is hazardous	
3. The electronic (or equivalent) system must be able to report for each of LoW code: • the total quantity of waste present on site at any one time • a breakdown of the waste quantities you are storing pending on-site treatment or awaiting onward transfer • where a batch of waste is located based on a site plan	As above

• the quantity of waste on site compared with the limits in your management system and permit • the length of time the waste has been on site compared with the limits in your management system and permit	
4. The electronic (or equivalent) system must also be able to report the total quantity of end-of-waste materials on site at any one time, and where that material is located based on the site plan.	As above
5. You must store back-up copies of records off site. These records must be readily accessible in an emergency.	All records are kept on online serves with backup systems in place.
6. You must keep acceptance records for a minimum of 2 years after you have treated the waste or removed it off site. You may have to keep records for longer if they are required for other purposes, for example hazardous waste consignment notes.	All acceptance records for a minimum of 2 years after it has been handled or treated the waste or removed it from the site.

3.0 Waste Storage

These are appropriate measures for waste storage at a regulated facility permitted to store, treat or transfer (or both) non-hazardous and inert waste.

1. You must have waste storage and handling procedures. You must store and handle waste in a way that makes sure you prevent and minimise pollution risks by using appropriate measures.	All waste is handled and stored in accordance with the details provided within the permit variation document and in accordance with the sites the EMS to minimise pollution risk at all opportunities. All storage takes place in dedicated storage areas and is managed in accordance with the sites: • Odour Management Plan • Fire Prevention Plan • Emissions and Dust Management Plan All waste stored externally in bays or containers are kept securely and in accordance with the FPP.
2. You must store waste in locations that minimise the unnecessary handling of waste.	All waste is managed in accordance with the sites Fire Prevention Plan and the EMS.
3. Waste handling must be carried out by competent staff using appropriate equipment. You must use mechanical unloading technologies where it is possible, safe and practicable to do so.	All storage takes place in dedicated storage areas and is managed in accordance with the sites: • Odour Management Plan • Fire Prevention Plan • Emissions and Dust Management Plan
4. 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.	All storage takes place in dedicated storage areas and is managed in accordance with the sites: • Odour Management Plan • Fire Prevention Plan • Emissions and Dust Management Plan

5. You must clearly document in your management system the maximum storage capacity of your facility and its designated storage areas. You must regularly monitor the quantity of stored waste against the allowed maximum capacities and not exceed them. You must define capacity in terms of, for example: cubic metres or tonnage numbers of skips or other containers maximum tank or vessel capacities	All storage takes place in dedicated storage areas and is managed in accordance with the sites: • Odour Management Plan • Fire Prevention Plan • Emissions and Dust Management Plan
6. You should clearly mark all waste storage areas and provide signs indicating the type of waste stored there.	All storage takes place in dedicated storage areas and is managed in accordance with the sites: • Odour Management Plan • Fire Prevention Plan • Emissions and Dust Management Plan
7. You must not accumulate wastes. You must treat wastes or remove them from the site as soon as possible. You must prioritise the treatment or off-site transfer of waste based on: its type its age on arrival	All storage takes place in dedicated storage areas and is managed in accordance with the sites: • Odour Management Plan • Fire Prevention Plan • Emissions and Dust Management Plan

the date of arrival the duration of storage on site	
8. Except for inert waste, you must follow the first-in-first-out principle, unless you need to prioritise more recently received wastes because they pose a higher risk of pollution.	All storage takes place in dedicated storage areas and is managed in accordance with the sites: • Odour Management Plan • Fire Prevention Plan • Emissions and Dust Management Plan
9. You must minimise refuse derived fuel (RDF) and solid recovered fuel (SRF) storage durations. You must implement an auditable bale identification system so that you can remove bales in date order.	All storage takes place in dedicated storage areas and is managed in accordance with the sites: • Odour Management Plan • Fire Prevention Plan • Emissions and Dust Management Plan
10. You must securely wrap bales of RDF and SRF with high-density polyethylene (HDPE) membrane or equivalent. This is to prevent water entering, access by pests and odour release. You should inspect bales regularly and rewrap any that are damaged. If they are wrapped securely, you can store them outside (unless your permit forbids this). If you store bales outside, your fire prevention plan must manage the risks from solar heating during hot weather.	All storage takes place in dedicated storage areas and is managed in accordance with the sites: • Odour Management Plan • Fire Prevention Plan • Emissions and Dust Management Plan
11. You must thoroughly clean storage bays and containers on a regular basis to prevent the build-up	All storage takes place in dedicated storage areas and is managed in accordance with the sites:

of aging waste, which will be a source of odour and attract vermin.	• Odour Management Plan • Fire Prevention Plan • Emissions and Dust Management Plan
12. All waste containers must be fit for purpose, that is: • in sound condition • not corroded, if metal • have well-fitting lids • suitable for the contents • with caps, valves and bungs in place and secure • within the manufacturer's designed lifespan, particularly for plastic containers	All storage takes place in dedicated storage areas and is managed in accordance with the sites: • Odour Management Plan • Fire Prevention Plan • Emissions and Dust Management Plan
13. You must inspect storage areas, containers and infrastructure regularly to make sure there is no loss of containment. You must deal with any issues immediately. You must keep written records of the inspections. You must clean up and log any spillages of waste.	All storage takes place in dedicated storage areas and is managed in accordance with the sites: • Odour Management Plan • Fire Prevention Plan • Emissions and Dust Management Plan
4.1 Segregation	
1. You should keep different types of waste segregated if contamination would inhibit the recovery of the waste.	All storage will take place in dedicated storage areas and is managed in accordance with the Fire Prevention Plan, Odour Management Plan and Dust Management Plan. Wastes are separated via the picking stations equipment or received in since source and are collected separately. No mixing of wastes takes place.

	All storage is carried out in accordance with the appropriate measures guidance and with the EMS systems.
2. Where paper, plastic, metal or glass have been collected separately, they must not be mixed with other waste or material. This duty applies where you are required to keep wastes separate and to help with or improve waste recovery.	Separate collections of paper, metal or plastic are kept separate, there is no mixing of wastes taking place.

4.0 Waste Treatment

These are waste treatment appropriate measures for a regulated facility permitted to store, treat or transfer (or both) non-hazardous and inert waste.

1. Waste treatment must have a clear and defined benefit. You must fully understand, monitor and optimise your waste treatment process to make sure that you treat waste effectively and efficiently. The treated output material must meet your expectations and be suitable for its intended disposal or recovery route. You must identify and characterise emissions from the process and take appropriate measures to control them at source.	Waste is checked and sorted in accordance with the site's waste pre-acceptance and acceptance procedures, which prevents unsuitable wastes being treated on site. Waste treatment processing is detailed the EMS Procedure SOP 3.5. Controls have been identified in relation to any emissions, and all storage is managed in accordance with the sites Fire Prevention Plan, Odour Management Plan and Dust Management Plan.
2. You must prevent unwanted or unsuitable material from entering subsequent waste treatment processes. • simplified process flow sheets that show the origin of the emissions • diagrams of the main plant items where they have environmental relevance, for example,	Process flow diagrams are included within the WRAP Protocol.

storage, tanks, treatment and abatement plant design • details of physical processes for example separation, compaction, shredding, heating, cooling or washing • an equipment inventory, detailing plant type and design parameters • waste types to be subjected to the process • the control system philosophy and how the control system incorporates environmental monitoring information • process flow diagrams (schematics) • the hourly processing capability of waste treatment equipment • a summary of operating and maintenance procedures The extent of the information about your treatment activities will depend on the nature, scale and complexity of your facility and the range of environmental impacts it may have. It is also based on the type and number of wastes processed.	
3. You must have up-to-date written details of the measures you will take during abnormal operating conditions to make sure you continue to comply with permit conditions. Abnormal operating conditions include:	

• unexpected releases • start-up • momentary stoppages • shutdown	
5.1 Soils and inert waste	
1. Soil and aggregate washing are a physico-chemical treatment (not a separation or sorting activity) and you must categorise the outputs as set out in WM3.	No soil and aggregate washing take place on site.
5.2 Waste treatment , including fines	
1. You must not make assumptions about the nature of the outputs from your waste treatment processes. You must make sure that you appropriately classify the outputs following WM3 If you do not, you may breach your Duty of Care for waste and commit an offence under the Environmental Protection Act 1990. This is particularly important for fines arising from shredding and trommelling processes, which generally: • require disposal at cost • contain a range of contaminants	WM3 assessments are carried out on residues. SOP 25 Waste Sampling and Classification Plan refers.

• are likely to be subject to a mirror entry code in the LoW, for example 19 12 11* versus 19 12 12	
2. Any hazardous waste taken from your facility must be consigned following our guidance Dispose of hazardous waste.	Waste treatment outputs are predominately to non-hazardous inert wastes. WM3 assessments will be carried out if necessary. Hazardous wastes such POPs and batteries, asbestos are consigned in accordance with EA guidance.
3. If an output is not waste, for example because end-of-waste criteria have been met, or the material has been produced in accordance with a Quality Protocol (resource framework), then you do not need to store the output within your permitted area. However, non-waste materials are still able to cause pollution, for which you remain liable. You must implement appropriate measures to prevent and minimise risks of pollution from non-waste and waste materials.	The company produce end of waste aggregates on site. The company WRAP protocol covers the management of product storage and pollution risk.
5.3 Waste Treatment for Landfill	
1. If you are handling or treating waste before you send it to landfill follow our guidance Dispose of waste to landfill.	The purpose of the recycling activities carried out on site is to ensure recovery of waste and reduce the quantity of waste to be disposed of.

5.0 Emissions Control

These are appropriate measures for emissions control for a regulated facility permitted to store, treat or transfer (or both) non-hazardous and inert waste.

1. You must identify, characterise and control emissions from your activities that may cause pollution.	
6.1 Enclosure within buildings	
1. Enclosing activities within buildings can be an appropriate measure for preventing and minimising emissions of pollution, given that an appropriately designed building will reduce a range of types of pollutants, in particular, noise, dust and odour. A partially enclosed building may be an appropriate measure on its own, or together with other appropriate measures, depending on the site-specific circumstances.	All identified emissions and mitigation measures are detailed with the permit application documentation, ERA and associated management plans. The site currently has no point source emissions to air, sewer,land and or water and none will be added as part of this permit variation application. To ensure any potential odour, dust, litter, and emissions are controlled on site via site specific plans FPP, DEMP and FPP are updated accordingly.
2. If your waste treatment activities are likely to cause (or are causing) significant pollution at sensitive receptors which cannot be addressed by alternative measures, then you must carry out that waste treatment activity within an enclosed building.	The majority of waste treatment activities and storage of waste is conducted within an enclosed buildings. The existing treatment of inert wastes is conducted externally, with water suppression and monitoring in place to control any potential emissions. No new proposed new waste streams are to be added in this variation. Due to the low volumes of HCI wastes handled and waste types, odour generation is not thought to be a risk. Given the context of the sites environmental setting, the impact of the variation will not result in any noise emissions.

3. You must also carry out non-treatment activities, such as storing and transferring waste (including loading and unloading) in enclosed buildings if these activities are likely to cause (or are causing) significant pollution at sensitive receptors which cannot be addressed by alternative measures. An enclosed building means a construction designed to provide sheltering cover and minimise emissions of noise, particulate matter, odour and litter. It must be enclosed on all sides. Its doorways must be as small as practicable and covered with fast-acting doors which default to the closed position. You must keep its windows closed unless you need to open them for ventilation. Dirty (process contaminated) air must pass through appropriate abatement before being emitted from the building.	As per the above
4. Material transfer and storage systems and equipment (for example conveyors, hoppers, containers and tanks) can extend outside the enclosed building so long as they are also fully enclosed.	As per the above
5. You must regularly assess your enclosed building's integrity. You should consider using BS EN ISO 9972:2015 to demonstrate building containment. This method is based on fan pressurisation. You should carry out a smoke test at least annually and where potential faults in building integrity are likely to be causing pollution such as odour. • the needs of the occupants working in the building	No buildings on site – Not applicable

• heat release • the volume of moist gas emissions that will be generated	
7. The air inside the enclosed building must be maintained under negative pressure, or you must install a localised extraction system that extracts dirty air from sources of pollution within the building. Sources that could potentially benefit from localised extraction include: • shredders and trommels • waste loading and unloading areas • odorous stockpiles	No buildings on site – Not applicable
8. You must regularly assess the integrity of your building for damage that could result in fugitive emissions, including noise breakthrough. You must prevent and minimise damage by implementing a maintenance programme.	No buildings on site – Not applicable
9. You must implement measures to control door opening, to make sure that the engineered ventilation system works as effectively as possible. It must direct emissions to the abatement system, rather than letting them escape as fugitive emissions through doors or windows. If you use negative pressure, it must be maintained when doors are opened, and you must monitor the pressure to demonstrate its effectiveness. Additional measures to minimise fugitive emissions may be required in	No buildings on site – Not applicable

some cases, for example installing an airlock entry system.	
10. To reduce emissions of noise and vibration, the building must have an appropriate minimum surface density. You must install acoustic seals on doors and windows, following advice from an acoustic specialist.	No buildings on site – Not applicable
6.2 Point Source Emissions to Air (channel emissions)	
1. You must use appropriate measures to make sure that you collect, extract and direct all process emissions to an appropriate abatement system for treatment before release. You must identify the main chemical constituents of your facility's point source emissions as part of your inventory of emissions to air. You must include the speciation of volatile organic compounds (VOCs) if you have identified them in the inventory and it is practicable to do so. You must characterise your emissions sufficiently to make sure that your chosen abatement systems are effective.	The site currently has no point source emissions to air. In respect to this permit variation there will be no point source emissions to air from the proposed changes. For the control of potential odour, dust and litter emissions the site has a site specific • Dust and Emissions Management Plan • Odour Management Plan • Fire Prevention Plan
2. You must make an assessment of the fate and impact of the substances emitted to air, following the Environment Agency's risk assessment guidance.	N/A
3. To reduce point source emissions to air (for example dust and odorous compounds) from the treatment of waste, you must use an appropriate combination of abatement techniques. Or you must	N/A

demonstrate to us that your alternative abatement is equally effective. The appropriate combination of abatement techniques would include one of more of: • adsorption • biofiltration, biotrickling or bioscrubbing • cyclone • fabric filter • water injection (into a shredder)	
4. You must assess and design vent and stack locations and heights to make sure dispersion capability is adequate and noise pollution is prevented. You may need to carry out dispersion modelling to establish whether the height of the vent or stack allows emissions to disperse appropriately, preventing any impacts on receptors.	N/A
5. Where monitoring is required, including for odour, you must install suitable monitoring points which meet the sampling standard for the relevant pollutants.	N/A
6. You must have procedures to make sure that you correctly operate, monitor and maintain abatement equipment.	N/A

7. Your monitoring should demonstrate the effectiveness of the abatement, so that you can take preventative or corrective action as necessary.	N/A
8. You should implement contingency measures for abatement system down-time and for any abnormal events, for example biofilter media change. These should include suspending operations until the site is back under control or having standby abatement available.	N/A
9. You should design and operate abatement systems to minimise water vapour plumes.	N/A
6.3 Fugitive Emissions to Air	
1. You must use appropriate measures to prevent and minimise fugitive emissions to air, including dust, mud and litter, odour and noise and vibration.	Fugitive emissions are controlled by the company EMS procedures. In respect to this permit variation there are controls to prevent fugitive emissions to air from the proposed changes. For the control of potential odour, dust and litter emissions the site has site specific management plans in place. • Dust and Emissions Management Plan • Odour Management Plan • Fire Prevention Plan
2. You must use your waste pre-acceptance, waste acceptance and site inspection checks and procedures to identify and manage wastes that could cause, or are causing, fugitive emissions to air. When you identify any such wastes you must:	Fugitive emissions are controlled by the company EMS procedures. In respect to this permit variation there are controls to prevent fugitive emissions to air from the proposed changes.

• take appropriate risk-assessed measures to prevent and control emissions • prioritise their treatment or transfer Where necessary to prevent fugitive emissions to air from the storage or handling of wastes, you should use a combination of the following measures: • use fully enclosed material transfer and storage systems and equipment outside buildings, for example conveyors, hoppers, containers, tanks and skips • store and handle the waste within a suitably enclosed area (for example bays), a building or enclosed building • keep doors closed except when access is required • keep enclosed buildings and equipment under adequate negative pressure with an appropriate abated air circulation or extraction system, locating air extraction points close to potential emission sources • use fast-acting or 'airlock' doors that default to closed	For the control of potential odour, dust and litter emissions the site has site specific management plans in place. • Dust and Emissions Management Plan • Odour Management Plan Fire Prevention Plan
3. You must have an appropriate, regular maintenance programme covering all buildings, plant and equipment. It must help prevent emissions	Regular inspections of all infrastructure ,plant and equipment are undertaken daily in line with the site inspection and audit regime. All repairs are tracked and recorded on the company compliance system.

or minimise them. Your maintenance programme must include: • a leak detection and repair programme to promptly identify and mitigate any fugitive emissions of organic compounds from treatment plant and associated infrastructure (for example, pipework, conveyors or tanks) • regular inspection and cleaning of all waste storage and treatment areas and equipment (including conveyor belts) to avoid large scale contamination activities • preventing plant and equipment from corroding (for example, conveyors or pipes) – including selecting and using appropriate construction materials, and lining or coating equipment with corrosion inhibitors	All plant and equipment are maintained in accordance with manufacturers guidance and the company PPM system.
4. You should monitor and log weather conditions – temperature, wind speed and direction, and describe any precipitation (for example none, drizzle, heavy rain, snow). You can use this information to identify when dispersion conditions are poor (that is, periods of warm, calm weather with wind blowing towards sensitive receptors). You can also use it to inform decisions to implement additional short-term pollution control contingency measures. If you have a weather station you should position it carefully, for example not placing it in between buildings. There is guidance in the World Meteorological Organization's Guide to	Weather conditions are monitored daily, throughout the day by the BHL Management Team and TCM, and formally recorded once a day. As part of the site Climate Change Procedure the company also are signed up to weather warnings such as flood alerts and MET office to pre-empt potential risk of adverse weather conditions that could impact site operations.

Meteorological Instruments and Methods of Observation.	
5. Relying on dispersion and wind direction to minimise pollution at sensitive receptors must be a last resort and you must not use it instead of measures that prevent and reduce pollution at source.	N/A
Other measures for dust, mud and litter	
6. If your activities are likely to produce dust and particulates, mud or litter that could cause pollution at sensitive receptors, or if such pollution has been substantiated, you must implement and regularly review a dust, mud and litter management plan. You must do this following our guidance. Your dust, mud and litter management plan must explain how you will prevent and minimise emissions of dust, mud and litter from your facility.	Fugitive emissions are controlled by the company EMS procedures. In respect to this permit variation there are controls to prevent fugitive emissions to such as dust, litter and mud from the proposed changes. For the control of potential odour, dust and litter emissions the site has site specific management plans in place. • Dust and Emissions Management Plan
7. Measures such as litter fencing and micro-netting should be located as close as possible to areas where you load and unload light-weight loose waste, if this activity is done outdoors. You should not rely on fences and screens at the perimeter of your facility to stop litter escaping.	See above
8. Measures such as mist sprays should be located as close as possible to point source emissions of dust, for example at conveyors, trommels, shredders, and	Misting systems are in place along the on external treatment areas.

at building entrances – except where this would increase odour from biodegradable waste.	
Other measures for odour	
9. 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 odour management: comply with your environmental permit. Your odour management plan must explain how you will prevent and minimise odorous emissions from your facility.	Due to the nature of the incoming waste, namely devoid of food or putrescible waste, there is a very low potential for odour generation through the site activities. The site has strict waste pre acceptance and acceptance procedures which will ensure that odorous waste is not accepted onto site. In the unlikely event that potentially odorous waste loads are accepted on site, they will be immediately rejected upon arrival in accordance with the sites waste rejection procedure SOP3.3 and investigated.
10. You must reject waste that is highly odorous as part of your pre-acceptance and waste acceptance procedures. This is unless you can handle and treat these wastes within an enclosed building with appropriate odour control measures, including extraction via odour abatement. Otherwise, you should talk to the waste supplier to stop it happening again. You should avoid receiving aged waste, for example by refusing to accept waste from other transfer stations that do not have strict inventory controls and documented holding times.	As per the above
11. You must make sure that odorous waste arrives at and leaves your facility in covered or enclosed vehicles. Mesh covers are not adequate to control odour. You should minimise how long potentially odorous waste is kept at your facility, in particular under anaerobic conditions. Making smaller stockpiles increases natural aeration, reducing the	N/A

risk of anaerobic biodegradation which can cause odour.	
12. You should wash empty vehicles before they leave your facility, to remove any residues which may be or become odorous. You must make sure the run-off from this process is contained and lawfully discharged.	N/A
13. You should not allow contaminated liquids to pool for long periods of time, as they can be a source of odour. If you do not have a drainage system inside the building that can collect the leachate or dirty water, then you will need other appropriate measures. You should take action to avoid ponding or pooling. Industrial vacuum cleaners can be used to suck up liquids. You should clean any spillages immediately.	N/A
14. You must cover odorous or potentially odorous waters or liquids or keep them in enclosed tanks or containers.	N/A
Other measures for noise and vibration	
16. 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. Follow our guidance H3 part 2 noise assessment and control. Your noise and vibration management plan must explain how you will prevent and minimise emissions of noise and vibration from your facility.	The site is in an industrial location. There is no sensitive habitat receptors located in the near the site. The site does not have any history of any environmental noise or amenity complaints. A noise and vibration management plan is not considered a requirement for the site. Control measures are in place to mitigate any potential noise emissions such as: • Low level of treatment activities • Site external layout sited away from sensitive receptors

	• Planned preventative maintenance systems • Equipment and roles are operated by trained and experienced staff • Site operational times (planning) are adhered to • White noise reversing alarms are utilised where necessary See SOP 3.11 refers
17. For noise, your noise and vibration management plan must be informed by a noise impact assessment carried out following the methodology of BS 4142:2014+A1:2019 'Methods for rating and assessing industrial and commercial sound'.	A noise and vibration management plan is not considered a requirement for the site.
18. For vibration, your noise and vibration management plan must be informed by a vibration impact assessment carried out following the methodology of BS 6472-1:2008 'Guide to evaluation of human exposure to vibration in buildings. Vibration sources other than blasting'.	A noise and vibration management plan is not considered a requirement for the site.
6.4 Point source emissions to water	
1. You must identify the main chemical constituents of your facility's point source emissions to water and sewer as part of your inventory of emissions.	There are no process emissions to controlled waters as a result of this permit variation. Drainage passes via a full retention oil separator to ensure that grease/oil is removed prior to discharge to the lagoon for the areas storing HCI combustible waste. The interceptor is checked monthly.

2. You must assess the fate and impact of the substances emitted to water and sewer following the Environment Agency's risk assessment guidance.	N/A
3. Discharges to water or sewer must comply with the conditions of an environmental permit and a trade effluent consent.	N/A
4. Relevant sources of waste water include: • runoff from all waste storage and handling areas, including loading and unloading areas • process water • condensate collected from treatment process • waste compactor runoff • vehicle washing • washing of containers and vessels • soil washing effluent • vehicle oil and fuel leaks • spills and leaks • rainwater from bunds around containers and tanks	As per 6.1.1

If you need to treat waste water before discharge or disposal, you must use appropriate treatment techniques. An appropriate combination of treatment techniques, for example, could include silt or solids removal and using an oil separator to manage site drainage.	
5. You must segregate uncontaminated water streams (for example clean runoff from roofs) from those that require treatment.	As per 6.1.1
6. You must separate contaminated water streams based on pollutant content and treatment required. For example, you may need to collect and treat separately contaminated surface runoff water and process water.	As per 6.1.1
6.5 Fugitive Emissions to land and water	
1. You must use appropriate measures to control potential fugitive emissions and make sure that they do not cause pollution. See the guidance on emissions to water and leaks from containers.	The site has been designed to control potential fugitive emissions to land and water see Drawing 003/8. HCI waste storage will take place on appropriately designed surfacing with contained drainage that meets CIRIA guidance. All tanks are appropriately bunded and meet CIRIA guidance. The only subsurface infrastructure on site relates to the site drainage system which is inspected and maintained as part of the sites maintenance and inspection programme. A spillage procedure is in place, with spill kits located around the site. Spill remediation equipment will be implemented in the event of a spillage. All staff are trained to respond in the event of a spill on site with regular spill drills and toolbox talks.

2. You must design appropriate surfacing and containment or drainage facilities for all operational areas, taking into account: • collection capacities • surface thicknesses • strength and reinforcement • falls • materials of construction • permeability • resistance to chemical attack • inspection and maintenance procedures • relevant standards of construction • end use, for example by tracked or wheeled vehicles or vehicle weight	As per 6.5.1
3. Your drainage infrastructure must: • prevent incompatible wastes coming into contact with each other • make sure that fire cannot spread	As per 6.5.1
4. You must store and treat all waste on an impermeable surface with contained drainage that meets CIRIA 736 or an equivalent approved standard. The impermeable surfaces must have	As per 6.5.1

sealed construction joints. These requirements do not apply in designated areas where the waste being stored or handled does not pose any significant risk of contaminating surface water or ground water. You must appropriately isolate these designated areas from other operational areas so that there cannot be any flows between them. This includes in the event of an accident, for example a fire.	
5. You must provide bunds for all tanks containing liquids (whether waste or otherwise) that could be harmful to the environment if spilled. Bunds must meet CIRIA 736 or an equivalent approved standard and: • be impermeable, stable and resistant to the stored materials • have no outlet (that is, no drains or taps) and drain to a blind collection point • have pipework routed within bunded areas with no penetration of contained surfaces • be designed to catch leaks from tanks or fittings • have an appropriate capacity • have regular visual inspections – any contents must be pumped out or otherwise removed under manual control after checking for contamination	As per 6.5.1

• be fitted with a high level probe and an alarm (as appropriate) if not frequently inspected • have tanker connection points within the bund (where possible), and if not possible you must provide adequate containment for spillages or leakage • have programmed engineering inspections (extending to water testing if structural integrity is in doubt) • be emptied of rainwater regularly to maintain the containment capacity	
6. All above-ground tanks containing liquids (whether waste or otherwise) that could be harmful to the environment if spilled must be kept on an impermeable surface with contained drainage that meets CIRIA 736 or an equivalent approved standard. You must fit the tanks with alarms and cut-out systems to detect and prevent leaks and spills.	As per 6.5.1
7. You must minimise using subsurface equipment and infrastructure, and decommission it where possible. For subsurface structures, you must: • establish and record the routing of all site drains and subsurface pipework • identify all subsurface sumps and storage vessels	As per 6.5.1

• engineer systems to minimise leakages from pipes and make sure they can be detected quickly if they do occur • provide secondary containment or leakage detection for subsurface pipework, sumps and storage vessels – vessels must be fitted with alarms and cut-out systems to detect and prevent spills when filling • establish an inspection and maintenance programme for all subsurface structures, for example, pressure tests, leak tests, material thickness checks or CCTV	
8. You must provide secondary containment that meets CIRIA 736, or an equivalent approved standard, for all drums and other mobile containers which: • are greater than 200 litres in capacity and are kept outside • contain liquids (waste or otherwise) that could be harmful to the environment if spilled	As per 6.5.1
9. You must comply with the oil storage regulations. These apply to non-hazardous wastes such as vegetable and cooking oil, as well as to biofuels and mineral oils.	The oil storage regulations are complied with in relation to fuel, waste oils and hydraulic oils. See BHL _Residues Management Plan.

10. You must provide appropriate buffer storage capacity at your facility to store waste waters, taking into account: • potential abnormal operating scenarios and incidents • the nature of any polluting substances and their impact on the downstream waste water treatment plant and receiving environment You must have appropriate measures to monitor, treat and reuse the water held in the buffer storage before discharging.	As per 6.5.1
11. You must take appropriate measures to prevent emissions from washing and cleaning activities, including: • containing and directing spray, liquid effluent and wash-waters to foul sewer or collecting them in a sealed system for offsite disposal – you must not discharge them to surface or storm drains • where possible, using biodegradable and noncorrosive washing and cleaning products • storing all detergents, emulsifiers and other cleaning agents in suitable bunded or containment facilities, within a locked storage area, or in a building away from any surface water drains	Washing and cleaning activities will be managed in accordance with the site's EMS. Biodegradable and noncorrosive washing and cleaning products are used for cleaning site surfaces and bay walls, stored with secondary containment internally from any drainage systems.

• preparing cleaning or disinfection solutions in contained areas of the site and never in areas that drain to the surface water system or groundwater	
12. You must produce and implement a spillage response plan and train staff to follow it and test it.	The site has a dedicated spillage response procedure SOP3.18 Spillage Procedure. All site operatives are trained on the spill response procedure and emergency procedures SOP 3.1Emergency Preparedness. Drainage management procedures and daily checklists are in place to identify defects/damage for all site surfacing and containment measures on site. Spill kits are checked weekly.
13. Your procedures and associated training must make sure you deal with spillages immediately. You should follow the manufacturer's health and safety advice for any products or substances involved.	All staff are trained to respond in the event of a spill on site with regular spill drills and toolbox talks. Records of all training are maintained.
14. You must keep spill kits at locations close to areas where a spillage could occur and make sure relevant staff know how to use them. You must make sure kits are replenished after use.	Spill kits are checked weekly as part of the site inspection regime. These are restocked when required. Reserve spill control equipment is maintained on site. The Spillage Control Kits will contain: • spill granules/sand • absorbent pads • disposal bag • containment drum/containers • protective gloves and goggles • damit mats

15. You must stop spillages from entering drains, channels, gullies, watercourses and unmade ground. You must make available proprietary sorbent materials, sand, booms or drain mats for use when required.	The site has a dedicated spillage procedure that will be implemented in the event of a spillage. All staff are trained to respond in the event of a spill on site. Any spillage of hazardous materials at the site shall be treated as an emergency and immediate action must be taken. The company follow the below principles of spill events: • Stop the source of fuel/spillage if possible & if it is safe to do so. • Contain the spill with pads, booms, granules etc. • Notify all persons on site of the incident as soon as possible & ensure management are aware.
16. You must make sure your spillage response plan includes information about how to recover, handle and correctly dispose of waste produced from a spillage.	SOP 3.18 refers The Spillage Control Kits will contain: • spill granules/sand • absorbent pads • disposal bag • containment drum/containers • protective gloves and goggles • damit mats

17. You must have a documented inspection and maintenance programme for impermeable surfaces and containment facilities and keep records to demonstrate its implementation.	The site has a dedicated PPM system to manage all aspects of containment systems. Drainage management procedures and daily checklists are in place to identify defects/damage for all site surfacing and containment measures on site.
6.6 Pests	
1. You must manage waste in a way that prevents pests. For example, if you do not manage flies, rats and birds they can affect operations, be a nuisance to neighbours and pose an environmental and health hazard as a potential vector for pathogens. We have produced internal guidance for our officers on fly management. Contact us if you would like a copy.	Due to the types of wastes stored and processed on site, pests are not likely to be a problem on site. The site will employ commercially available products and services to control pests if deemed necessary. The site is inspected daily for the presence of pests which is recorded in the daily inspection record should any activity be revealed. Specialist external contractor will visit the site quarterly, which will be recorded in the site compliance system.
2. If you expect pests will cause pollution, hazard or annoyance at sensitive receptors, or if this has been substantiated, you must create, use and regularly review a pest management plan, following our guidance.	A Pest Management Plan is not considered necessary due to the proposed wastes accepted on site and site operations.
3. Your pest management plan must include procedures for: • inspecting for and controlling pests • rejecting loads of infested waste • treating pest infestations promptly, and removing waste if necessary	SOP 3.13 covers the below criteria. • inspecting for and controlling pests • rejecting loads of infested waste • treating pest infestations promptly, and removing waste if necessary

• storing, handling and using approved pest control products – you can get information on using chemicals at work from the Health and Safety Executive	• storing, handling and using approved pest control products and disposal

6.0 Emissions monitoring and limits

These are emissions limits and appropriate measures for monitoring emissions to air and water for a regulated facility permitted to store, treat or transfer (or both) non-hazardous and inert waste.

7.1 Emissions to air	
1.Your facility's emissions inventory must include information about the relevant characteristics of point source emissions to air, such as the: • average values and variability of flow and temperature • average and peak concentration and load values of relevant substances and their variability • presence of other substances that may affect the waste gas treatment system or plant safety, for example, oxygen, nitrogen, water vapour and dust	The site currently has no point source emissions to air with none to be added as part of this permit variation application. Due to the types of waste that the existing activities on site handle, dust should not be an issue on site. The existing waste stream accepted on site (mixed recyclable waste,wood, plastic waste, glass, metals and paper and cardboard) are not dusty wastes and will not create emissions to air of dust. Monitoring for fugitive emissions to air will be carried out in accordance with the site DEMP Dust and Emissions Management Plan. This will consist of ongoing meteorological monitoring, management of wastes in buildings or securely when stored externally, and daily site inspections (not exhaustive). Further monitoring will be implemented if complaints are received.

Guidance on monitoring stack emissions is available.	
2. You must monitor fugitive emissions of dust and particulates if they are likely to cause pollution at sensitive receptors, or if this has been substantiated. There is guidance on developing monitoring strategies for assessing levels of pollutants in the ambient atmosphere and monitoring particulate matter in ambient air around waste facilities.	Dust and Emissions Management Plan (DEMP) is in place which details all monitoring that will be carried out routinely on site and site Audits and Environmental Monitoring procedures.
3. You must describe your monitoring programme in your dust management plan. Visual monitoring is not effective for assessing the risk of emissions of fine particulates, for example PM10. You should use dust and particulate monitors with trigger alarms instead. You should set alarm trigger levels to alert site staff when short-term particulate concentrations are elevated, so that you can review site practices or increase your mitigation measures. When combined with weather data, dust and particulate monitors can also provide evidence to demonstrate that your facility is not the cause of complaints. You should use a particulate limit of 75 µg/m3 to100 µg/m3 (over a 5 minute average) for PM10 as an initial trigger for action, and reduce this after the system has been in place for some time.	Dust and Emissions Management Plan (DEMP) is in place which details all monitoring that will be carried out routinely on site and site Audits and Environmental Monitoring procedures.
7.2 Medium Combustion Plant Directive	
1. If you operate medium combustion plant or specified generators you must monitor your emissions following the Environment Agency guidance on Monitoring stack emissions: low risk	N/A

MCPs and specified generators and maintain a record of the type and quantity of fuel used in the plant.	
2. If you have a generator that uses natural gas, for example in a boiler, you must comply with the specified generator regulations.	N/A
3. You must keep periods of start-up and shut-down for medium combustion plant and specified generators to a minimum. You must notify the Environment Agency of newly installed combustion units before start-up.	N/A
4. You must notify the Environment Agency at least 14 days in advance of any planned changes to the medium combustion plant or generator which could affect compliance with any emission limits that apply, this includes notifying us of any significant upgrades.	N/A
7.3 Emissions to Water and Sewer	
1. Your facility's emissions inventory must include information about the relevant characteristics of point source emissions to water or sewer, such as: • average values and variability of flow, pH and conductivity • average concentration and load values of relevant substances and their variability, for example, chemical oxygen demand (COD)	No point source emissions to water/sewer

and total organic carbon (TOC), metals, priority substances or micropollutants • data on bio-eliminability, for example, biochemical oxygen demand (BOD), BOD to COD ratio, biological inhibition potential (for example, inhibition of activated sludge)	
2. For relevant emissions to water or sewer identified by the emissions inventory, you must monitor key process parameters (for example, waste water flow, pH, temperature, conductivity or BOD) at appropriate locations. For example, these could either be at the: • inlet or outlet (or both) of the pre-treatment • inlet to the final treatment • point where the emission leaves the facility boundary	No point source emissions to water/sewer

7.0 Process efficiency appropriate measures

These are process efficiency appropriate measures for a regulated facility permitted to store, treat or transfer (or both) non-hazardous and inert waste.

For your installation's facility, you must monitor and review the annual quantity of:

- water, energy and raw materials used
- residues and waste water produced

You must do this at least once every year.

8.1 Energy Efficiency (Installations Only)	
1. You must create and implement an energy efficiency plan at your facility. This must: • define and calculate the specific energy consumption of the activity (or activities) you carry out and waste stream(s) you treat • set annual key performance indicators, for example specific energy consumption (expressed in kWh/tonne of waste processed) • plan periodic improvement targets and related actions	N/A
2. You must regularly review and update your energy efficiency plan as part of your facility's management system.	N/A
3. You must have and maintain an energy balance record for your facility. This must provide a	N/A

breakdown of your energy consumption and generation (including any energy or heat exported) by the type of source (electricity, gas, conventional liquid fuels, conventional solid fuels, and waste). You should provide Sankey diagrams or energy balances to show how energy is used in your waste treatment processes.	
4. You must regularly review and update your energy balance record as part of your facility's management system, alongside the energy efficiency plan.	N/A
5. You must have operating, maintenance and housekeeping measures in relevant areas, for example: • air conditioning, process refrigeration and cooling systems (leaks, seals, temperature control, evaporator or condenser maintenance) • the operation of motors and drives • compressed gas systems (leaks, procedures for use) steam distribution systems (leaks, traps, insulation) • space heating and hot water systems • lubrication to avoid high friction losses • boiler operation and maintenance, for example, optimising excess air	N/A

• other maintenance relevant to the activities within the facility	
6. You must have measures in place to avoid gross energy inefficiencies. These should include for example: • insulation • containment methods (such as seals and self-closing doors) • avoiding unnecessary discharge of heated water or air (for example, by fitting simple control systems such as timers and sensors)	N/A
7. You should implement additional energy efficiency measures at the facility as appropriate, following our guidance.	N/A
8.2 Raw Materials (Installations Only)	
1. You must maintain a list of the raw materials used at your facility and their properties. This includes auxiliary materials and other substances that could have an environmental impact.	N/A
2. You must regularly review the availability of alternative raw materials and use any suitable ones that are less hazardous or polluting. This should include, where possible, substituting raw materials with waste or waste-derived products.	N/A

3. You must justify the continued use of any substance for which there is a less hazardous alternative.	N/A
4. You must have quality assurance procedures to control the content of raw materials.	N/A
8.3 Water Use (Installations Only)	
1. You must take measures to make sure you optimise water consumption to: • reduce the volume of waste water generated • prevent or, where that is not practicable, reduce emissions to soil and water	N/A
2. Measures you must take include: • implementing a water saving plan (involving establishing water efficiency objectives, flow diagrams and water mass balances) • optimising the use of washing water (for example, dry cleaning instead of hosing down, using trigger control on all washing equipment) • recirculating and reusing water streams within the plant or facility, if necessary after treatment	N/A

• reducing the use of water for vacuum generation (for example, using liquid ring pumps with high boiling point liquids) where relevant	
3. You must carry out a regular review of water use (a water efficiency audit) at least every 4 years.	N/A
4. You must also: • produce flow diagrams and water mass balances for your activities • establish water efficiency objectives and identify constraints on reducing water use beyond a certain level (usually this will be site specific) • identify the opportunities for maximising the reuse, and minimising the use of water • have a timetabled improvement plan for implementing additional water reduction measures	N/A
5. To reduce emissions to water, you should apply these general principles in sequence: • use water efficient techniques at source where possible • reuse water within the process by treating it first if necessary – if this is not practicable,	N/A

use it in another part of the process or facility that has a lower water quality requirement • if you cannot use uncontaminated roof and surface water in the process, you should keep it separate from other discharge streams – at least until after you have treated the contaminated streams in an effluent treatment system and have carried out final monitoring	
6. You should establish the water quality requirements associated with each activity and identify whether you can substitute water from recycled sources. Where you can, include it in your improvement plan.	N/A
7. Where there is scope for reuse (possibly after some form of treatment) you should keep less contaminated water streams, such as cooling waters, separate from more contaminated streams.	N/A
8. You must minimise the volume of water you use for cleaning and washing down by: • vacuuming, scraping or mopping in preference to hosing down • reusing wash water (or recycled water) where practicable • using trigger controls on all hoses, hand lances and washing equipment	N/A

9. You must directly measure fresh water consumption and record it regularly at every significant usage point, ideally every day.	N/A

8.0 Waste minimisation, recovery and disposal

These are waste minimisation, recovery and disposal appropriate measures for a regulated facility permitted to store, treat or transfer (or both) non-hazardous and inert waste.

1. You must have and implement a residues management plan that: • minimises the generation of residues, that is solid waste arising from the treatment of waste • optimises the reuse, regeneration, recycling or energy recovery of residues, including packaging • makes sure you properly dispose of residues where recovery is technically or economically impractical	Minimal waste is produced by operations on site. SOP BHL_Residues Management Plan covers the management of all wastes received, produced and arising form site operations.
2. Where you must dispose of waste, you must carry out a detailed assessment identifying the best environmental options for waste disposal.	Minimal waste is produced by operations on site. SOP BHL_Residues Management Plan covers the management of all wastes received, produced and arising form site operations.

You must review on a regular basis options for recovering and disposing of waste produced at the facility. You must do this as part of your management system to make sure that you are still using the best environmental options and promoting the recovery of waste where technically and economically viable.	

APPROPRIATE MEASURES

CHEMICAL WASTE

A Buckler Haulage Ltd

Land/premises At

Lloyd Street

Middlesbrough

Cleveland

TS2 1DW

Olive Compliance Ltd
Planet House
Northumbrian Way
Killingworth
NE12 6EH
Company Number:12861220

1.0 Asbestos Wastes

These are appropriate measures for the environmental management of a Chemical waste: appropriate measures for permitted facilities in relation to the BHL site and the permit variation.

4. Waste storage, segregation and handling appropriate measures

These are the appropriate measures for waste storage, segregation and handling at regulated facilities with an environmental permit for treating or transferring chemical waste.	
31. You must store asbestos waste double bagged or wrapped, in sealed, closed and locked containers. You must not store asbestos waste loose. You must not put asbestos wastes into bays or transfer it between different skips or containers. You must not use mechanical equipment, for example loading shovels, chutes and conveyors to move asbestos waste.	Asbestos wastes shall not be removed from its primary packaging (bags or wrapping). Asbestos waste shall: • be double bagged, or where necessary, securely wrapped; • be kept within clearly identified, segregated, sealed, secure, lockable bulk container on an impermeable surface with sealed drainage system; and • not be stored loose or in bays. Asbestos waste shall not be transferred between different bulk containers. Bulk containers shall be locked when not being loaded and shall not be stacked. No treatment is carried out to this waste stream.