



# Application for an environmental permit: Part C3 – Variation to a bespoke installation permit

**Fill in this part of the form, together with parts A, C2 and F1, if you are varying a bespoke permit for an installation.**

Please check that this is the latest version of the form available from our website.

Please read through this form and the guidance notes that came with it. All relevant guidance documents can be found on our website.

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## 1 About your activities

### 1a Tell us about the activities you want to do.

Fill in Table 1a below with details of all the activities listed in schedule 1 of the Environmental Permitting Regulations (EPR) and all directly associated activities (DAAs) (in separate rows) that you propose to carry out at the installation.

Fill in a separate table for each installation you are applying for. Use a separate sheet if you have a long list and send it to us with your application form. Tell us the document reference.

Document reference

Permit Variation Application May 2018

### Notes to help you complete Table 1a:

1 Quote the section number, part A1 or A2 or B, then paragraph and sub paragraph number as shown in part 2 of schedule 1 to the regulations.

2 Use the description from schedule 1 of the regulations. Include any extra detail that you think would help to accurately describe what you want to do.

3 By 'capacity', we mean:

- the total incineration capacity (tonnes every hour) for waste incinerators;
- the total landfill capacity (cubic metres) for landfills;
- the total treatment capacity (tonnes each day) for waste treatment;
- the total storage capacity (tonnes) for waste storage operations;
- the processing and production capacity for manufacturing operations; or
- the thermal input capacity for combustion activities.

4 The R (recovery) and D (disposal) codes are as set out in Annex I and/or Annex II of the European Waste Framework Directive (as amended).

5 Fill this in as a separate line for each directly associated activity and give an accurate description of any other activities associated with your schedule 1 activities.

6 By 'total storage capacity', we mean the maximum amount of waste, in tonnes, you are able to store on the site at any one time.

**Table 1a – Types of activities**

**Important:** Put your main activity first, when listing all of the activities you want to do. Note; some questions only apply to activities involving the acceptance of waste.

Schedule 1 listed activities						
Installation name	Schedule 1 references (See note 1)	Description of the Activity (See note 2)	Activity capacity (See note 3)	Annex I and Annex 2 (disposal and recovery) codes (See note 4)	Hazardous waste treatment capacity (if this applies) (See note 3)	Non-hazardous waste treatment capacity (if this applies) (See note 3)
Warwick International Group Limited, Mostyn site	Section 4.1 A (1)(a)(iv)	Producing organic compounds containing nitrogen (amines)	Receipt of raw materials to dispatch of finished product, including internal recycling of raw materials			
Warwick International Group Limited, Mostyn site	Section 5.1 A (1)(a)	On-site incineration of process wastes with the recovery of heat	Incineration of distillation residues arising during the on-site production of tetra acetyl ethylenediamine (TAED)			
Warwick International Group Limited, Mostyn site	Section 5.3 A(1)(c)(ii)	Treatment and storage of process effluent and site surface water drainage	pH adjustment and storage of process effluent arising during the on-site production of tetra acetyl ethylenediamine (TAED)			
<b>Directly associated activities (See note 5)</b>						
Name of DAA		Description of the DAA (please identify the schedule 1 activity it serves)				
Combustion of natural gas to raise steam and heat thermal transfer fluid		No limits				

For installations that take waste	Total storage capacity of non-hazardous waste (See note 6)	
	Total storage capacity of hazardous waste (See note 6)	
	Annual throughput (tonnes each year)	

## 1b Do you intend to accept waste as part of your activities?

No ☒ Go to section 2

Yes ☐ Tell us about the waste types you want to accept. See notes below.

For each line in Table 1a (including DAAs), fill in a separate document to list those types of waste you will accept onto the site for that activity. Give the List of Wastes catalogue code and description.

If you need to exclude wastes from your activity or facility by restricting the description, quantity, physical nature, hazardous properties, composition or characteristic of the waste, include these in the document. Send it to us with your application form.

If you want to accept any waste with a code ending in 99, you must provide more information and a full description in the document. You can use Table 1b as a template.

Document references

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**Table 1b – Template example: types of waste accepted and restrictions**

Waste code	Description of waste
Example	Example
02 01 08*	Agrochemical waste containing dangerous substances
06 01 02*	Hydrochloric acid

## 2 Emissions to air, water and land

Fill in Table 2 below with details of the emissions that result from the operating techniques at each of your installations.

Fill in one table for each installation. You can use Table 2 as a template. Please provide the reference for each document.

Document references

**Table 2 – Emissions (releases)**

Installation name		Warwick International Group Limited		
Point source emissions to air				
Emission point reference and location	Source	Parameter	Quantity Unit	Unit
A2, A3, A5, A6, A7, A20, A22, A23, A24	Manufacturing plant scrubbing systems	Acetic acid and ahuydride	50	Mg/m3
A16, A17, A18, A19, A21	Steam raising plant	Oxides of nitrogen/carbon monoxide	170/70	Mg/m3
A14	Waste incineration	Particulate matter/carbon monoxide/oxides of nitrogen	10/50/400	Mg/m3
Point source emissions to water (other than sewers)				
Emission point reference and location	Source	Parameter	Quantity Unit	Unit
W1	Waste water discharge	COD/solid content/BOD/ammo niacle nitrogen	6000/250/3000 /5	Mg/l

W1	Waste water discharge	Daily discharge volume/tidal discharge volume	4500/2250	M3
W1	Waste water discharge	pH	5 - 9	
W1	Waste water discharge	Temperature	25 winter/35 summer	Centigrade
<b>Point source emissions to sewers, effluent treatment plants or other transfers off site</b>				
Emission point reference and location	Source	Parameter	Quantity Unit	Unit
<b>Point source emissions to land</b>				
Emission point reference and location	Source	Parameter	Quantity Unit	Unit

### 3 Operating techniques

#### 3a Technical standards

Fill in Table 3a for each activity at the installation you have referred to in Table 1a above, and list the relevant technical guidance note (TGN) or notes you are planning to use. If you are planning to use the standards set out in the TGN, there is no need to justify using them.

You must justify your decisions in a separate document if:

- there is no technical standard;
- the technical guidance provides a choice of standards; or
- you plan to use another standard.

This justification could include a reference to the Environmental Risk Assessment provided in section 6 of part C2 (General Bespoke Permit) of the application form. The documents in Table 3a should summarise the main measures you use to control the main issues identified in the H1 assessment or technical guidance.

For each of the activities listed in Table 3a, describe the type of operation and the options you have chosen for controlling emissions from your process.

Fill in one table for each installation. You can use Table 3a as a template. Please provide the reference for each document.

Document references

<b>Table 3a – Technical standards</b>		
<b>Installation name</b>		
Schedule 1 activity or directly associated activity description	Relevant technical guidance note or best available techniques as described in BAT conclusions under IED*. You will need to refer to 'How to comply' for all permits.	Document reference (if appropriate)

	'How to comply'	
*Directive 2010/75/EU of the European Parliament and of the Council of 24 November 2010 on industrial emissions (integrated pollution prevention and control).		

If appropriate, use block diagrams to help describe the operation and process. Give the document references you use for each diagram and description.

Document references

### 3b General requirements

Fill in a separate Table 3b for each installation. You can use Table 3b as a template. Please provide the reference for each document.

Document references

Table 3b – General requirements	
Installation name	
If the TGN or H1 assessment shows that emissions of substances not controlled by emission limits are an important issue, send us your plan for managing them	Document reference or references
If the TGN or H1 assessment shows that odours are an important issue, send us your odour management plan	Document reference or references
If the TGN or H1 assessment shows that noise or vibration are important issues, send us your noise or vibration management plan (or both)	Document reference or references
If our fire prevention guidance or H1 assessment shows that fire risk is an important issues, send us your fire management plan	Document reference or references

### 3c Types and amounts of raw materials

Fill in Table 3c for all schedule 1 activities. Fill in a separate table for each installation. You can use Table 3c as a template. Please provide the reference for each document.

Document references

Table 3c – Types and amounts of raw materials				
Installation name				
Capacity (See note 1 below)				
Schedule 1 activity	Description of raw material and composition material	Maximum amount (tonnes) (See note 2 below)	Annual throughput (tonnes per year)	Description of how the raw material is used including any main hazards (include safety information sheets)


#### Notes

1 By 'capacity', we mean the total storage capacity (tonnes) or total treatment capacity (tonnes each day).

2 By 'maximum amount', we mean the maximum amount of raw materials on your site at any one time.

Use a separate sheet if you have a long list of raw materials, and send it to us with your application form. Please provide the reference for each document.

Document reference

### 3d Information for specific sectors

For some sectors, we need more information to be able to set appropriate conditions in the permit. This is as well as the information you may provide in sections 5, 6 and 7.

For those activities listed below, you must answer the questions in the related document.

Table 3d – Questions for specific sectors	
Sector	Appendix
Combustion	See the questions in appendix 1
Chemicals	See the questions in appendix 2
Intensive farming	See the questions in appendix 3
Clinical waste	See the questions in appendix 4
Hazardous and non-hazardous waste recovery and disposal	See the questions in appendix 5
Incinerating waste	See the questions in appendix 6

## 4 Monitoring

### 4a Describe the measures you use to monitor emissions by referring to each emission point in Table 2 above

You should also describe any environmental monitoring. Tell us:

- how often you use these measures;
- the methods you use; and
- the procedures you follow to assess the measures.

Document reference

### 4b Point source emissions to air only

Provide an assessment of the sampling locations used to measure point source emissions to air. The assessment must use Technical Guidance Note M1 (Monitoring). This is available in the Guidance section on our Website.

Document reference

## 5 Environmental impact assessment

### 5a Have your proposals had an environmental impact assessment under Council Directive 85/337/EEC of 27 June 1985 [Environmental Impact Assessment] (EIA)?

No ☒ Now go to section 6

Yes ☐ Please provide a copy of the environmental statement and, if the procedure has been completed:

- a copy of the planning permission; and
- the committee report and decision on the EIA.

Document reference

## 6 Resource efficiency and climate change

If the site is a landfill, you only need to fill in this section if the application includes landfill gas engines.

### 6a Describe the basic measures for improving how energy efficient your activities are

Document reference

### 6b Provide a breakdown of any changes to the energy your activities use and create

Document reference

### 6c Have you entered into, or will you enter into, a climate change levy agreement?

No ☐ Describe the specific measures you use for improving your energy efficiency.

Document reference

Yes ☒ Please give the date you entered (or the date you expect to enter) into the agreement.

05/02/2007

Please also provide documents that prove you are taking part in the agreement.

Document reference

13 Annex A Registration Form

### 6d Tell us about, and justify your reasons for, the raw and other materials, other substances and water you will use

Document reference

### 6e Describe how you avoid producing waste in line with Council Directive 2008/98/EC on waste

If you produce waste, describe how you recover it.

If it is technically and financially impossible to recover the waste, describe how you dispose of it while avoiding or reducing any effect it has on the environment.

Document reference



## Appendix 1 – Specific questions for the combustion sector

**1 Identify the type of fuel burned in your combustion units (including when your units are started up, shut down and run as normal). If your units are dual fuelled (that is, use two types of fuel), list both the fuels you use**

Fill in a separate table for each installation.

Installation reference			
Type of fuel	When run as normal	When started up	When shut down
Coal			
Gas oil			
Heavy fuel oil			
Natural gas			
WID waste			
Biomass (see notes 1 and 2 below)			
Biomass (see notes 1 and 2 below)			
Biomass (see notes 1 and 2 below)			
Biomass (see notes 1 and 2 below)			
Biomass (see notes 1 and 2 below)			
Other			

**Notes**

1 Not covered by Industrial Emissions Directive 2010/75/EU.

2 'Biomass' is referred to in The Renewables Obligation Order 2002 (SI 2002 No. 914).

Give extra information if it helps to explain the fuel you use.

Document reference

**2 Give the composition range of any fuels you are currently allowed to burn in your combustion plant**

Fill in a separate table for each installation.

Installation reference					
Parameter	Unit	Fuel 1	Fuel 2	Fuel 3	Fuel 4
Maximum percentage of gross thermal input	%				
Moisture	%				
Ash	% wt/wt dry				
Sulphur	% wt/wt dry				
Chlorine	% wt/wt dry				
Arsenic	% wt/wt dry				
Cadmium	% wt/wt dry				
Carbon	% wt/wt dry				
Chromium	% wt/wt dry				

Copper	% wt/wt dry				
Hydrogen	% wt/wt dry				
Lead	% wt/wt dry				
Mercury	% wt/wt dry				
Nickel	% wt/wt dry				
Nitrogen	% wt/wt dry				
Oxygen	% wt/wt dry				
Vanadium	mg/kg dry				
Zinc	mg/kg dry				
Net calorific value	MJ/kg				

**3 If NO<sub>x</sub> factors are necessary for reporting purposes (that is, if you do not need to monitor emissions), please provide the factors associated with burning the relevant fuels**

Fill in a separate table for each installation.

Installation reference	
Fuel	NO <sub>x</sub> factor (kgt–1)
Fuel 1	
Fuel 2	
Fuel 3	
Fuel 4	
Note: kgt–1 means kilograms of nitrogen oxides released for each tonne of fuel burned	

**4 Will your combustion plant be subject to Chapter III of the Industrial Emissions Directive 2010/75/EU? (see Government guidance)**

No ☒ *This Annex is complete.*

Yes ☐

**5 Is your plant (tick an option)**

an existing plant (a plant licensed before 1 July 1987)? ☐

a new plant (a plant licensed on or after 1 July 1987 but before 27 November 2002, or a plant for which an application was made before 27 November 2002 and which was put into operation before 27 November 2003)? ☐

a new-new plant (a plant for which an application was made on or after 27 November 2002)? ☒

**6 If you run more than one type of plant or a number of the same type of plant on your installation, please list them in the table below**

Fill in a separate table for each installation.

Installation reference	
Type of plant	Number within installation
Existing	
New	
New-new	

Gas turbine (group A)	
Gas turbine (group B)	

**7 If you run an existing plant, have you submitted a declaration for the 'limited life derogation' set out in Article 33 of Chapter III of the Industrial Emissions Directive?**

No ☒ *Go to section 9*

Yes ☐

**8 Have you subsequently withdrawn your declaration?**

No ☐

Yes ☐

**9 List the existing large combustion plants (LCPs) which have annual mass allowances under the National Emission Reduction Plan (NERP), and those with emission limit values (ELVs) under the LCPD**

Installation reference	
LCPs under NERP	LCPs with ELVs

**10 Do you meet the monitoring requirements of Chapter III of the Industrial Emissions Directive?**

Yes ☒

Tell us how you meet the monitoring requirements of Chapter III and give us the reference for this document.

Document reference

## Appendix 2 – Specific questions for the chemical sector

### 1 Please provide a technical description of your activities

The description should be enough to allow us to understand:

- the process;
- the main plant and equipment used for each process;
- all reactions, including significant side reactions (that is, the chemistry of the process);
- the material mass flows (including by products and side streams) and the temperatures and pressures in major vessels;
- the all emission control systems (both hardware and management systems), for situations which could involve releasing a significant amount of emissions – particularly the main reactions and how they are controlled;
- a comparison of the indicative BATs and benchmark emission levels standards in Technical Guidance Notes (TGNs) EPR 4.01, EPR 4.02 and EPR 4.03, and chemical sector BREFs.

Document reference

As identified in the original permit application

### 2 If you are applying for a multi-purpose plant, do you have a multi-product protocol in place to control the changes?

No ☒

Yes ☐ Provide a copy of your protocol to accompany this application

Document reference

### 3 Does Chapter V of the Industrial Emissions Directive (IED) apply to your activities?

No ☐ This Annex is complete.

Yes ☐ Fill in Table 3a – listing each of the activities controlled under the IED.

Table 3a – activities controlled under the IED.	
Installation reference	
Activities	

### 3b Describe how the list of activities in question 3a above meets the requirements of the IED

Document reference

### Appendix 3 – Specific questions for the intensive farming sector

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**1 For each type of livestock, tell us the number of animal places you are applying for**

Installation reference	
Type of livestock	Number of places

**2 Is manure or slurry exported from the site?**

No ☐

Yes ☐

**3 Is manure or slurry spread on the site?**

No ☐

Yes ☐

## Appendix 4 – Specific questions for the clinical waste sector

If you are applying for an activity covered by the Waste Incineration Directive and wish to accept clinical waste you should fill in questions 1, 2 and 3 of this appendix.

Note: If your procedures are fully in line with the standards set out in EPR5.07 then you should tick the 'yes' box and provide the procedure reference. There is no need for you to supply a copy of the procedure.

**1 Are pre-acceptance procedures in place that are fully in line with the appropriate measures set out in section 2.2 of EPR 5.07 and which are used to assess a waste enquiry before it is accepted at the installation?**

No ☐ Provide justification for departure from EPR 5.07 and submit a copy of the procedures

Document reference

Yes ☐ Document reference

**2 Are waste acceptance procedures in place that are fully in line with the appropriate measures set out in section 2.2 of EPR 5.07, and which are used to cover issues such as loads arriving and being inspected, sampling waste, rejecting waste, and keeping records to track waste?**

No ☐ Provide justification for departure from EPR 5.07 and submit a copy of the procedures

Document reference

Yes ☐ Document reference

**3 Are waste storage, handling and dispatch procedures, and infrastructure in place that are fully in line with the appropriate measures set out in section 3.2 of EPR 5.07?**

No ☐ Provide justification for departure from EPR 5.07 and submit a copy of the procedures

Document reference

Yes ☐ Document reference

**4 Are monitoring procedures in place that are fully in line with the appropriate measures set out in section 3.3 of EPR 5.07?**

No ☐ Provide justification for departure from EPR 5.07 and submit a copy of the procedures

Document reference

Yes ☐ Document reference

**5 Are you proposing to either**

- accept an additional waste not included in Table 2.1 of section 2.1 of EPR 5.07, or
- apply a permitted activity to a waste other than that identified for that waste in Table 2.1?

No ☐

Yes ☐ Provide justification : Document reference

**6 Please provide a summary description of the treatment activities undertaken on the installation. This should cover the general principles set out in section 2.1.4 of EPR 5.07**

Document reference

**7 Please provide layout plans detailing the location of each treatment plant and main plant items and process flow**

Document reference

## Appendix 5 – Specific questions for the hazardous and non-hazardous waste recovery and disposal sector

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Note: If your procedures are fully in line with the standards set out in SGN 5.06 then you should tick the 'yes' box and provide the procedure reference. There is no need for you to supply a copy of the procedure.

**1 Are pre-acceptance procedures in place that are fully in line with the appropriate measures set out in section 2.1.1 of SGN 5.06, and which are used to assess a waste enquiry before it is accepted at the installation?**

No ☐ Provide justification for departure from SGN 5.06 and submit a copy of the procedures

Document reference

Yes ☐ Document reference

**2 Are waste acceptance procedures in place that are fully in line with the appropriate measures set out in section 2.1.2 of SGN 5.06, and which are used to cover issues such as loads arriving and being inspected, sampling waste, rejecting waste, and keeping records to track waste?**

No ☐ Provide justification for departure from SGN 5.06 and submit a copy of the procedures

Document reference

Yes ☐ Document reference

**3 Are waste storage procedures and infrastructure in place that are fully in line with the appropriate measures set out in section 2.1.3 of SGN 5.06?**

No ☐ Provide justification for departure from SGN 5.06 and submit a copy of the procedures

Document reference

Yes ☐ Document reference

**4 Provide a layout plan giving details of where the installation is based, the infrastructure in place (including areas and structures for separately storing types of waste which may be dangerous to store together) and capacity of waste storage areas and structures**

Document reference

**5 Provide a summary of the treatment activities carried out on the installation. This should cover the general principles set out in section 2.1.4 of SGN 5.06 and the specific principles set out in sections 2.1.5 to 2.1.15 as appropriate of SGN 5.06**

Document reference

**6 Provide layout plans giving details of where each treatment plant is based, the main items at each plant, and process flow diagrams for the treatment plant**

Document reference

## Appendix 6 – Specific questions for the waste incineration sector

If you are proposing to accept clinical waste please also fill in questions 1, 2 and 3 of appendix 4 above.

### 1a Do you run incineration plants as defined by Chapter IV of the Industrial Emissions Directive (IED)?

No ☐ You do not need to answer any other questions in this appendix.

Yes ☐ WID applies

### 1b Are you subject to IED as an incinerator or co-incinerator?

As an incinerator ☐

As a co-incinerator ☐

### 2 Do any of the installations contain more than one incineration line?

No ☐ Go to section 4

Yes ☐

### 3 How many incineration lines are there within each installation?

Fill in a separate table for each installation

Installation reference	
Number of incineration lines within the installation	
Reference identifiers for each line	

You must provide the information we ask for in questions 4, 5 and 6 below in separate documents. The information must at least include all the details set out in section 2 ('Key Issues') of TGN S5.01 (under the subheading 'European legislation and your application for an EP Permit').

### 4 Describe how the plant is designed, equipped and will be run to make sure it meets the requirements of IED, taking into account the categories of waste which will be incinerated

Document reference

### 5 Describe how the heat created during the incineration and co-incineration process is recovered as far as possible (for example, through combined heat and power, creating process steam or district heating)

Document reference

### 6 Describe how you will limit the amount and harmful effects of residues and describe how they will be recycled where this is appropriate

Document reference

For each line identified in question 3, answer questions 7 to 13 below

Question 3 identifier, if necessary

### 7 Do you want to take advantage of the Article 45 (1)(f) allowance (see below) if the particulates, CO or TOC continuous emission monitors (CEM) fail?

No ☐ Go to section 8

Yes ☐ This article allows 'abnormal operation' of the incineration plant under certain circumstances when the CEM for releases to air have failed. Annex VI, Part 3(2) sets maximum half hourly average release levels for particulates (150mg/m<sup>3</sup>), CO (normal ELV) and TOC (normal ELV) during abnormal operation.



Describe the other system you use to show you keep to the requirements of Article 13(4) (for example, using another CEM, providing a portable CEM to insert if the main CEM fails, and so on).

**8 Do you want to replace continuous HF emission monitoring with periodic hydrogen fluoride (HF) emission monitoring by relying on continuous hydrogen chloride (HCl) monitoring as allowed by IED Annex VI, Part 6 (2.3)?**

Under this you do not have to continuously monitor emissions for hydrogen fluoride if you control hydrogen chloride and keep it to a level below the HCl ELVs.

No ☐ *Go to section 9*

Yes ☐ Please give reasons for doing this.

**9 Do you want to replace continuous water vapour monitoring with pre-analysis drying of exhaust gas samples, as allowed by IED Annex VI, Part 6 (2.4)?**

Under this you do not have to continuously monitor the amount of water vapour in the air released if the sampled exhaust gas is dried before the emissions are analysed.

No ☐

Yes ☐ Please give reasons for doing this.

**10 Do you want to replace continuous hydrogen chloride (HCl) emission monitoring with periodic HCl emission monitoring, as allowed by IED Annex VI, Part 6 (2.5), first paragraph?**

Under this you do not have to continuously monitor emissions for hydrogen chloride if you can prove that the emissions from this pollutant will never be higher than the ELVs allowed.

No ☐

Yes ☐ Please give reasons for doing this.

**11 Do you want to replace continuous HF emission monitoring with periodic HF emission monitoring, as allowed by IED Annex VI, Part 6 (2.5), first paragraph?**

Under this you do not have to continuously monitor emissions for hydrogen fluoride if you can prove that the emissions from this pollutant will never be higher than the ELVs allowed.

No ☐

Yes ☐ Please give reasons for doing this.

**12 Do you want to replace continuous SO<sub>2</sub> emission monitoring with periodic sulphur dioxide (SO<sub>2</sub>) emission monitoring, as allowed by IED Annex VI, Part 6 (2.5), first paragraph?**

Under this you do not have to continuously monitor emissions for sulphur dioxide if you can prove that the emissions from this pollutant will never be higher than the ELVs allowed.

No ☐

Yes ☐ Please give reasons for doing this.

**13 If your plant uses fluidised bed technology, do you want to apply for a derogation of the CO WID ELV to a maximum of 100 mg/m<sub>3</sub> as an hourly average, as allowed by IED Annex VI, Part 3?**

No ☐

Does not apply ☐

Yes ☐ Please give reasons for doing this.

## Appendix 7 – Specific questions for the landfill sector

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### 1 Provide your Environmental Setting and Installation Design (ESID) report

Document reference

### 2 Provide your hydrogeological risk assessment (HRA) for the site

Document reference

### 3 Provide your stability risk assessment (SRA) for the site

Document reference

### 4 Provide your landfill gas risk assessment (LFGRA) for the site

Document reference

Templates for these four reports can be found using the links on our Guidance Webpages.

### 5 Provide your proposed plan for closing the site and your procedures for looking after the site once it has closed

Document reference