APPLICATION FOR AN ENVIRONMENTAL PERMIT UNDER THE ENVIRONMENTAL PERMITTING (ENGLAND AND WALES) REGULATIONS 2016 (AS AMENDED)

NON-TECHNICAL SUMMARY

MR VICTOR KESERU –
TRADING AS ENVIK WASTE RECYCLING SERVICES

WESTSIDE, CAMBRIAN INDUSTRIAL ESTATE
COEDCAE LANE, PONTYCLUN, CF72 9EX

ECL Ref: ENVK.01.01/EPTR
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ACRONYMS / TERMS USED IN THIS REPORT

ASCR	Application Site Condition Report
BAT	Best Available Techniques
BREF	Best Available Techniques Reference Document
CIWM	Chartered Institute of Waste Management
DSEAR	Dangerous Substances and Explosive Atmospheres Regulations 2002
EA	Environment Agency
ECL	Environmental Compliance Limited
EMS	Environmental Management System
Envik Waste	Mr Victor Keseru trading as Envik Waste
EP Regulations	Environmental Permitting (England and Wales) Regulations 2016 as amended
EP	Environmental Permit
EPTR	Environmental Permitting Technical Requirements
ERA	Environmental Risk Assessment
IED	Industrial Emissions Directives
LEL	Lower Explosion Limit
NGR	National Grid Reference
NRW	Natural Resources Wales
OS	Ordnance Survey
PPMR	Planned Preventative Maintenance Regime
SGN	Sector Guidance Note
The Facility	Envik Waste Gas Cylinder Storage Facility
WAMITAB	Waste Management Industry Training and Advisory Board
WAC	Waste Acceptance Criteria
WPAC	Waste Pre-acceptance Criteria

1. INTRODUCTION

1.1. Overview

1.1.1. Environmental Compliance Limited ("ECL") has been commissioned by Mr Victor Keseru trading as Envik Waste Recycling Services ("Envik Waste") to prepare an Environmental Permitting Technical Requirements ("EPTR") document to form part of the bespoke waste operation Environmental Permit ("EP") application for their proposed gas cylinder storage Facility, hereafter referred to as "the Facility" or "the site".

1.1.2. The most recent version of the EPTR (Issue 5, September 2025) has been amended with regard to Schedule 5 notice, reference PAN-026369 Schedule 5 Re-Issue, ("the Schedule 5") which was issued by Natural Resources Wales ("NRW") on the 3rd September 2025.

1.2. Facility Location

1.2.1. The Facility is located at Westside, Cambrian Industrial Estate, Coedcae Lane, Pontyclun, CF72 9EX. The Facility occupies an approximate area of 280m^2 and is centred on National Grid Reference ("NGR") 302691, 182150.

1.2.2. The Site Location Plan (Drawing Reference ENVK.01.01-01) details the Environmental Permit boundary (outlined in green) and is provided with this application submission.

1.2.3. The indicative site location (red circle) and its surroundings is provided in Figure 1.

Figure 1: Indicative Site Setting

2. PROPOSED ACTIVITIES

2.1. Bespoke Waste Operation Activities

2.1.1. The proposed activities at the Facility fall under Schedule 9, Part 1 (waste operations) of the Environmental Permitting (England and Wales) Regulations 2016 as amended ("EP Regulations").

2.1.2. The proposed waste codes to be accepted at the Facility are detailed in Table 1.

Table 1: Proposed Waste Codes to be Accepted

Code	Description
15	**WASTE PACKAGING, ABSORBENTS, WIPING CLOTHS, FILTER MATERIALS AND PROTECTIVE CLOTHING NOT OTHERWISE SPECIFIED**
15 01	**Packaging (including separately collected municipal packaging waste)**
15 01 04	Metallic Packaging
15 01 10*	Packaging containing residues of or contaminated by hazardous substances
16	**WASTES NOT OTHERWISE SPECIFIED IN THE LIST**
16 05	**Gases in pressure containers and discarded chemicals**
16 05 04*	Gases in pressure containers (including halons) containing hazardous substances
16 05 05	Gases in pressure containers other than those mentioned in 16 05 04

2.1.3. Only those canisters containing propane, butane and proprietary propane/butane mixtures will be accepted on Site. No foams will be accepted.

2.1.4. The waste management operations to be carried out at the Site as specified in Annex I of the Waste Framework Directive 2008 are detailed below:

- **R3**: Recycling/reclamation of organic substances which are not used as solvents (including composting and other biological transformation processes);
- **R4**: Recycling/reclamation of metals and metal compounds;
- **R13**: Storage of wastes pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced); and
- **D15**: Storage pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where it is produced).

2.1.5. Due to the small-scale nature of the proposed waste operations, Envik Waste is proposing to treat a maximum of 500 tonnes of non-hazardous waste and 12 tonnes of hazardous waste per annum.

2.1.6. It is proposed that Envik Waste shall store a maximum of 50 tonnes of non-hazardous waste at the Facility and 1 tonne of hazardous waste at any one time.

2.1.7. Envik Waste shall treat a maximum of 5 tonnes per day of waste of non-hazardous waste and maximum of 1 tonne per day of hazardous waste.

3. MANAGEMENT TECHNIQUES

3.1. Technical Competence

3.1.1. Under the EP Regulations, the activities at the Facility are classified as a relevant waste operation, and, accordingly, a Technically Competent Manager will be required. Mr Jack Keseru will fulfil this role. He is registered and working towards obtaining the Chartered Institute of Waste Management ("CIWM") Waste Management Industry Training and Advisory Board ("WAMITAB") Operator Competence Scheme (with Brightwater Education Limited, CIWM learner number 139256) awards HRC04a and HRC06.

3.2. Overview of Environmental Management System

3.2.1. Envik Waste will operate their own Environmental Management System ("EMS") at the Facility which will address environmental aspects of the proposed activities. The EMS will be written in accordance with the EA's online guidance 'Develop a management system: environmental permits' which is adopted by Natural Resources Wales ("NRW"). The EMS and all appendices eg Planned Preventative Maintenance Plan will be available within 1 month of the issue of the permit.

3.2.2. Victor Keseru has overall responsibility including environmental matters at the Facility.

3.2.3. Envik Waste will establish a documented EMS which:

- ensures compliance with all relevant legislation;
- ensures compliance with the Facility's Environmental Permit;
- identifies, assesses and minimises the risks of pollution arising from the Facility's activities;
- includes a Planned Preventative Maintenance Plan ("PPMR") detailing all service, maintenance and testing requirements for the Facility;
- comprises a range of written procedures that cover all aspects of the Facility's activities;
- identifies, sets, monitors and reviews environmental objectives and key performance indicators; and
- includes a requirement to report annually on environmental performance, objectives, targets and future planned improvements.

4. OPERATING TECHNIQUES

4.1. Technical Standards

4.1.1. **European Legislation -** The following European Legislation will be used to inform the application:

- the Industrial Emissions Directive ("IED") is intended to be a single legislative instrument for permitting, compliance and enforcement of environmental legislation across all member states. The requirement of the IED will therefore be considered relevant at this time; and
- the Best Available Techniques ("BAT") Reference Document ("BREF") for Waste Treatment (October 2018) will be given consideration as although not directly applicable as it covers installations, it provides BAT associated with a number of waste treatments including recovery and disposal of waste.

4.1.2. **National Legislation –** NRW implement the requirements of the IED via the EP Regulations and have provided a number of guidance documents to assist in the preparation of Environmental Permit applications and the ongoing management of permitted sites. The guidance documents used in the preparation of this application are as follows:

- NRW's 'How to comply with your environmental permit' (Version 8, October 2014); and
- Environment Agency ("EA") online permitting guidance (adopted by NRW), such as 'Develop a management system: environmental permits' and 'Risk assessments for your environmental permit' and 'Control and monitor emissions for your environmental permit';
- Guidance for applicants H5: Site condition report – guidance and templates (Version 5.0, October 2014);
- EA Sector Guidance Note ("SGN") IPPC S5.06 '*Guidance for the Recovery and Disposal of Hazardous and Non-Hazardous Waste'* (Issue 5, Date 2013). No equivalent NRW guidance is available at the time of writing; and
- EA's Addendum to SGN IPPC S5.06 'Guidance for the storage and treatment of aerosol canisters and similar packaged wastes' (Version 1.0, November 11). No equivalent NRW guidance is available at the time of writing.

4.2. Proposed Waste Activities

4.2.1. Due to the small-scale nature of the proposed waste operations, Envik Waste is proposing to treat a maximum of 500 tonnes of non-hazardous waste and 12 tonnes of hazardous waste per annum.

4.2.2. Canisters which are full or partially fully will comprise hazardous waste.

4.2.3. Non-hazardous waste will comprise those canisters which are shown as empty on the pressure gauge and in addition have previously been cracked, pierced or otherwise emptied (prior to being accepted on Site) and therefore contain only negligible traces of gas.

4.2.4. Wastes will only be accepted as non-hazardous if they have been classified as such by the waste producer in accordance with the Waste Duty of Care requirements and documentation.

4.3. Waste Codes to be Accepted at the Facility

4.3.1. The proposed waste codes to be accepted at the Facility are detailed in Table 1 of Section 2.1.

4.4. Waste Pre-Acceptance Arrangements

4.4.1. The waste pre-acceptance criteria ("WPAC") are detailed in the EPTR. The purpose of the WPAC is to provide a fully documented procedure to ensure that wastes are subject to appropriate technical appraisal prior to acceptance at the site. In turn, this will ensure that unsuitable wastes are not accepted. The WPAC checks will be carried out before any decision is made to accept a waste delivery.

4.4.2. The WPAC will be incorporated into the EMS and as such will be reviewed routinely in line with the EMS ensuring they remain effective and up to date. The EMS will be available within 1 month of the Permit being issued.

4.5. Waste Acceptance Arrangements

4.5.1. The waste acceptance criteria ("WAC") are detailed in the EPTR The purpose of the WAC is to provide a fully documented incoming waste acceptance procedure for the Facility, the primary purpose of which is to confirm that the characteristics of the incoming waste matches the information provided at the pre-acceptance stage.

4.5.2. Waste acceptance paperwork will ensure the following information will be recorded:

- date of arrival on-site;
- time;
- original producers' details (or unique identifier);
- unique reference number and hazard classification; and
- type of waste accepted including physical and chemical composition, handling requirements and compatibility issues; and
- quantity of waste accepted (based upon weight and/or no as appropriate).

4.4.2. The WAC will be incorporated into the EMS and as such will be reviewed routinely in line with the EMS ensuring they remain effective and up to date. The EMS will be available within 1 month of the Permit being issued.

4.6. Waste Handling and Storage

4.6.1. A Site Layout Plan (Drawing Reference ENVK.01.01-02 Issue 2) has been submitted with this Environmental Permit application and details the location of the waste treatment and storage areas.

4.6.2. It is proposed that Envik Waste shall store a maximum of 50 tonnes of non-hazardous waste at the Facility and 1 tonne of hazardous waste at any one time.

4.6.3. As part of the EMS, waste handling and transfer procedures will be implemented. This will include ensuring prevention of accidental damage of canisters due to crushing, falling or impact.

4.6.4. No waste shall be stored on site longer than 3 months. The average storage time for non-hazardous waste is 8 weeks. Hazardous waste will be stored for an average of 3 days prior to treatment. Post treatment, any hazardous waste will be removed from site weekly, provided there is sufficient available, and will not remain on site for more than 1 month under normal circumstances.

4.6.5. The waste storage areas have been chosen based on safe storage operation and to achieve adequate storage capacity. The site has also been designed to ensure all waste storage areas are accessible at all times and that there is a minimum distance from covered areas to open air.

4.6.6. All incoming waste to the Facility is unloaded into the reception area. From here it will be moved to the appropriate designated waste storage area as directed by the Site Manager to ensure correct waste segregation based on waste compatibility.

4.6.7. The average time for hazardous and non-hazardous waste to reside within the reception area is 1 hour. All waste will be removed from the reception area by the end of each working day.

4.6.8. Waste will be segregated into different designated storage areas to ensure there will be no mixing of waste types.

4.6.9. Cardboard and combustible packing will be removed from the storage areas and no other flammable waste will be stored in the storage area.

4.6.10. Waste destined for onsite treatment will be stored separately to those cylinders which are only destined for storage and transfer off-site (company owned cylinders such as those belonging to BOC and Flogas).

4.6.11. Hazardous waste will be stored in separate designated areas from non-hazardous waste.

4.6.12. Each designated area will be clearly marked with signage to display hazard properties of the wastes.

4.6.13. Each waste type will be stored in secure, well-ventilated containers with fitted lids. Lids on containers remain securely closed at all times when not being filled, emptied or internally inspected.

4.6.14. All waste containers will be stored under cover in a well vented location to ensure they are not subject to extreme temperatures or direct sunlight and that rainwater cannot collect in the containers.

4.6.15. Envik Waste will implement a daily visual inspection of process equipment and all gas cylinders and canisters. This is to identify any leaking containers.

4.6.16. Physical protection measures (barriers) will be in place to protect the storage areas from vehicles. Mobile plant is also stored away from storage and treatment areas and have also been selected to prevent introduction of ignition sources. For example, Envik utilise a diesel power forklift truck on site.

4.6.17. Storage areas will be kept away from sources of ignition and smoking is prohibited on site.

An appropriate fire extinguisher system will also be in place. Due to treatment being undertaken, a DSEAR assessment will also be undertaken by a suitably qualified person.

4.7. Waste Treatment

4.7.1. Envik Waste shall not treat more than 5 tonnes per day of non-hazardous waste and no more than 1 tonne per day of hazardous waste.

4.7.2. Waste treatment at the Facility will be limited to physical treatment of hazardous and non-hazardous waste comprising piercing under suction in an enclosed fit for purpose system, collecting and recompressing gases and piping any residual liquids to one of two, specially designed, compressed-gas storage tanks. There are no point source emissions to air or water from the process.

4.7.3. The treatment process has been designed by a registered Gas Safe engineer so that the residual gases and liquids contained in the canisters will be extracted and collected efficiently and safely, as an integral part of the treatment process, enabling them to be recovered/reused at an appropriately permitted facility, whilst managing potentially flammable substances and preventing explosive atmospheres. In line with the COSHH assessments, particular attention has been paid to procedures to ensure that propane will not be stored within the designated butane tank .

4.7.4. The post treatment storage tanks will be constructed of earthed steel designed to be compatible with the materials held, UN tested and integrally sound and are fitted with emergency relief systems and alarms. The tanks conform to the UK LPG Codes of Practice 01, Parts 1 and 2 and in addition to British Standard PD 5500 CAT 2. The tanks are designed and constructed to prevent the release of fugitive emissions. Recovered gases will be removed regularly to a suitable recovery facility preventing build up on Site.

4.7.5. The anti-static pipework used throughout the treatment equipment conforms with UKLPG Code of Practice 22.

4.7.6. Canister treatment and the storage of recovered gases/liquids will be undertaken in a well-ventilated, covered area to prevent the formation of an explosive atmosphere. The gas treatment equipment and post-treatment storage tanks will be located on impermeable hardstanding and isolated from the drainage system with suitable separation from stored combustible materials, other sources of ignition and sensitive receptors.

4.7.7. The risk of explosion is considered low due to the minimal residual gas that is being expelled during the piercing activity and the safety measures in place. However, a Dangerous Substances and Explosive Atmospheres Regulations 2002 (“DSEAR”) assessment will be undertaken by a suitably qualified person.

4.7.8. Once the canisters have been treated, they will be stored in a designated container for removal offsite to an appropriately permitted facility.

4.7.9. Written operating procedures will be included in the EMS and all site operatives using the equipment will be appropriately trained in the operating procedure, code of good practice and emergency procedures.

4.8. Waste Dispatch

4.8.1. Waste shall be removed offsite to an appropriate licensed facility or installation.

4.8.2. The majority of the waste shall be removed as 15 01 04 (empty packaging) if both the residue and contamination are absent and the container is not made of hazardous solid material in accordance with WM3.

4.8.3. Residual gases extracted from the treated canisters will be recovered/reused at an appropriately permitted facility.

4.8.4. Removal of waste materials from the Facility will be documented in accordance with Duty of Care requirements.

4.9. Records

4.9.1. A waste tracking system will be implemented which will hold all the information generated during the pre-acceptance, acceptance, storage, treatment and removal off site.

4.9.2. All records are held in hard copy and electronically within the office building so that they are readily available. All digital Waste Transfer Note records will be held for a maximum of 4 years to satisfy Duty of Care requirements. All other documentation will be held for 6 years or until Permit surrender in accordance with the Permit. Back up copies are maintained offsite.

4.10. Proposed Infrastructure and Drainage Arrangements

4.10.1. The storage and treatment areas of the Facility benefit from impermeable surfacing. The Facility is located within a secure compound, completely enclosed by 2m high metal palisade fencing and a lockable main entrance gate which is locked out of hours. The yard is also located within the Cambrian Industrial Estate which benefits from its own security measures, including security surveillance, security lighting and lockable front entrance gate.

4.10.2. All wastes are stored in containers on drip trays and there are no drains on the site.

4.10.3. Envik Waste will implement a regime of visual site condition checks which will be undertaken weekly to ensure that the infrastructure is maintained in good condition. The results of these checks and details of any remedial action and maintenance that may be required in order to ensure good condition will be recorded in the site diary.

5. EMISSIONS

5.1. Emissions to Air

5.1.1. Treatment will be undertaken using bespoke fit for purpose equipment designed to remove all residual gases and liquids via a sealed system with no emission points.

5.1.2. The potential for other sources of fugitive emissions to air from the proposed operation is considered to be very limited.

5.1.3. There is minimal potential for fugitive emissions of dust and fine particulates to air. The waste types accepted on site will not generate dust and fine particulates. All waste is stored in sealed containers under cover. There are minimal vehicle movements. The site will be inspected daily and measures taken to dampen down site surfaces during dry weather as required.

5.1.4. EMS procedures will include carrying out a daily programme of inspection and regular maintenance of all storage containers (See Section 4.3.). The use of enclosed/covered containers, as well as undertaking regular housekeeping, will reduce the risk of fugitive emissions to air.

5.2. Emissions to Surface Water

5.2.1. There will be no point source emissions to surface water. There is no direct connection to surface water at the Facility.

5.3. Emissions to Sewer

5.3.1. There will be no point source emissions to sewer. There is no direct connection to sewer at the Facility.

5.4. Emissions to Land

5.4.1. There will be no point source emissions to land.

5.5. Fugitive Emissions to Surface Water, Sewer and Groundwater

5.5.1. The Facility will be surfaced with impermeable concrete and isolated from the drainage network.

5.5.2. Fugitive releases to the groundwater will be prevented by conducting all operations, including the unloading of deliveries and storage and handling of waste materials in areas sealed with an impervious barrier to prevent a pathway for migration to ground and groundwater.

5.5.3. As discussed above, the treatment equipment is fully contained with no emission points to air or water.

5.5.4. Only 20 litres of diesel for the fork lift and compressor truck will be stored within a control of substances hazardous to health ("COSHH") cabinet within the onsite building isolated from any drainage network.

5.5.5. Plant and equipment will be subject to regular maintenance and servicing as per the Facility's PPMR. This will ensure they are in good working order.

5.5.6. Regular site inspections will be undertaken which will include observing any spillages and to guarantee the continued integrity of storage containers and impermeable concrete surfacing. If remedial action is required, this will be undertaken immediately.

5.5.7. All employees will be suitably trained in all aspects of the EMS including spill response, such as the deployment of absorbent mats. Spill kits will be strategically located and contents regularly inspected and maintained.

5.6. Fugitive Emissions to Land

5.6.1. The waste types accepted pose a minimal risk of generating windblown litter. In addition, wastes are kept in sealed containers and under cover. There is a 2m high fence around the facility which will minimise the risk of any windblown litter leaving the premises.

5.6.2. The nature of the activities undertaken mean that there is limited risk of mud being generated. There is minimal vehicle access on the premises minimising the risk of any mud being taken onto public highways. Vehicles will be inspected before leaving site and tyres washed down if required.

5.6.3. Regular site inspections will be undertaken, which will include recording litter and mud within the facility and on the road outside the facility gate. If remedial action is required, this will be undertaken immediately.

6. GENERAL REQUIREMENTS

6.1. Emissions Management

6.1.1. The Environmental Risk Assessment ("ERA") (Document Reference ENVK.01.01/ERA Issue 4) submitted as part of this application has demonstrated that emissions of substances not controlled by emission limits (i.e., fugitive emissions) are not considered to be significant, consequently, an Emissions Management Plan is not required as part of this application.

6.2. Odour Management

6.2.1. The proposed waste types to be accepted are not considered odorous in nature. The ERA (Document Reference ENVK.01.01/ERA Issue 4) submitted as part of this application has demonstrated that odour emissions are not considered to be significant, consequently, an Odour Management Plan is not required as part of this application.

6.3. Noise Management

6.3.1. The proposed operations are not considered to be noise generating. The ERA (Document Reference ENVK.01.01/ERA Issue 4) submitted as part of this application has demonstrated that noise emissions are not considered to be significant, consequently, a Noise Management Plan is not required as part of this application.

6.4. Pest Management

6.4.1. The proposed waste types are not considered to attract pests. Consequently, a Pest Management Plan is not required as part of this application.

6.5. Dust and Fine Particulates

6.5.1. The proposed waste types will not generate dust and fine particulates. Therefore a dust management plan is not required as part of this application.

6.6. Mud Management

6.6.1. The proposed operations will not generate mud. Consequently a mud management plan is not required as part of this application.

6.7. Fire Management

6.7.1. Due to the nature of waste to be accepted (hazardous waste and gas cylinders/ aerosols/canisters), a Fire Prevention Plan is not required as part of this application.

6.7.2. General fire prevention and protection measures will be implemented in accordance with the Facility's ERA (Document Reference ENVK.01.01/ERA Issue 4). Of particular note, storage areas are kept away from sources of ignition and smoking is prohibited on site. An appropriate fire extinguisher system will also be in place. Due to treatment being undertaken, a DSEAR assessment will also be undertaken by a suitably qualified person.

6.8. Waste Hierarchy

6.8.1. In accordance with the requirements of regulation 12 of the Waste (England and Wales) Regulations 2011, and in-line with good environmental practice, the operations undertaken at the facility apply the Waste Hierarchy as follows:

- **Prevention** - Preparing canisters and fire extinguishers for reuse/refilling promotes reduced waste generation at the source
- **Reuse** - Gas canisters and fire extinguishers are checked on arrival to site and if suitable are transferred off site for re-use/re-filling at appropriate facilities. Any residual gas and liquids extracted from canisters during treatment is sent off site for reuse at a suitable facility.
- **Recycling** - Gas cylinders which cannot be re-used are treated on site to ensure all reasonable efforts have been made to remove the left-over contents. The resulting metal is sent off-site to be recycled. Packaging materials are recycled at appropriately permitted facilities.
- **Other Recovery/Disposal -** Any remaining waste from the treatment process which is not suitable for recycling is disposed of at suitable waste disposal facilities. Options are regularly evaluated to ensure disposal to landfill and incineration without recovery are avoided where possible.

7. APPLICATION SITE CONDITION REPORT

7.1. An Application Site Condition Report ("ASCR") has been prepared to form part of the Environmental Permit application. The ASCR (Document Reference ENVK.01.01/ASCR Issue 3) has been submitted as part of this application.

8. MONITORING

8.1. Monitoring of Emissions to Air

8.1.1. There will be no point source emissions to air.

8.1.2. Fugitive emissions to air will be prevented by conducting all treatment of canisters in a fully enclosed, sealed system. Therefore no monitoring of emissions to air is proposed.

8.1.1. The Site Manager will undertake daily visual and olfactory (sniff testing) monitoring to ensure no fugitive emissions to air are present and monitoring will be recorded in the site diary.

8.2. Monitoring of Groundwater

8.2.1. Fugitive releases to the groundwater will be prevented by conducting all operations, including the unloading of deliveries, storage of waste materials, processing and handling in areas sealed with an impervious barrier to prevent a pathway for migration to ground or groundwater. Consequently, no monitoring of groundwater is proposed.

8.3. Monitoring of Surface Water and Foul Water

8.3.1. There will be no point source (i.e., process contribution) to water. Therefore, monitoring of water is not applicable.

8.4. Process Monitoring

8.4.1. Gas leakage detectors will be installed on the treatment equipment which use sensors to continuously monitor the concentration of the combustible gases, propane and butane, and trigger an audible and visual alarm if the lower explosion limit (“LEL”) is reached.

8.4.2. In addition to the continuous monitoring for LEL, the treatment and post treatment storage tanks (one propane and one butane) are fitted with liquid contents gauges/ullage valves to prevent them from being over filled and pressure gauges to ensure the tanks are operating within safe pressure limits thus preventing over-pressurization and ensuring the integrity of the storage vessel.

9. RESOURCE EFFICIENCY

9.1. Overview

9.1.1. As part of the EMS, Envik Waste will monitor consumption of raw materials as well as the annual generation of waste, with a frequency of at least once per year.

9.2. Energy Efficiency

9.2.1. The storage activities do not consume electricity and the treatment equipment shall not use electricity to prevent introducing an ignition source. Consequently, monitoring of energy consumption and implementation energy efficiency measures are not applicable.

9.3. Raw Material Justification

9.3.1. The primary raw material is the waste source itself i.e. gas cylinders, canisters, aerosols.

9.3.2. 20 litres of diesel for the fork lift truck and compressor will be stored within a control of substances hazardous to health ("COSHH") cabinet within the onsite building isolated from any drainage network.

9.3.3. Envik Waste's vehicles used for waste collections are serviced and maintained every 10 weeks

9.4. Waste Minimisation

9.4.1. The proposed activities to be undertaken are based on the application of the waste hierarchy and in particular, waste prevention and recycling.

9.4.2. For each waste stream, the following will be monitored and recorded as part of the Waste Tracking System;

- the physical and chemical composition of waste;
- its hazard characteristics; and
- handling precautions and substances with which it cannot be mixed.

9.4.3. Using the information recorded as part of the waste tracking system, a waste minimisation audit will be undertaken 12 months after the Environmental Permit has been issued. This will allow Envik Waste to set a baseline against which improvement targets can be set.

10. COMPLIANCE WITH BAT CONCLUSIONS

10.1. Overview

10.1.1. It is considered that the techniques that will be in use at the proposed Facility will constitute BAT and will be appropriate and proportionate for the scale of the activities at the Facility and the risks that are posed to the environment by these activities.