

## **ENVIRONMENTAL PERMIT (BESPOKE MPP) APPLICATION**

Cae Ffynnon Abbeylands,

Llanarmon-Yn-Ial,

Mold,

Clwyd,

CH7 4QU

Prepared for: Richard Rogers



360 Environmental Ref: EPRROGERS001

April 2019

<b>Question reference</b>	<b>Document title</b>	<b>Document reference</b>
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# ENVIRONMENTAL PERMIT (BESPOKE MPP) APPLICATION

## Application forms

Prepared for: Richard Rogers



April 2019

<p><b>Fill in this part A if you are applying for a new permit, applying to change or surrender an existing permit, or want to transfer an existing permit to yourself.</b></p> <p>Please check that this is the latest version of the form available from our website.</p> <p>Please read through this form and the guidance notes that come with it. All relevant guidance documents can be found on our website.</p> <p>Where you see the term 'document reference' on the form,</p>	<p>give the document references and send the documents with the application form when you've completed it.</p> <p>Contents</p> <p>1 About you</p> <p>2 Applications from individuals</p> <p>3 Applications from organisations of individuals</p> <p>4 Applications from public bodies</p> <p>5 Applications from a registered company or other corporate body</p> <p>6 Your address</p> <p>7 Contact details</p>
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### 1 About you

Are you applying as an individual, an organisation of individuals (for example, a partnership), a company (this includes Limited Liability Partnerships) or a public body?

- |   |                                     |                        |
|---|-------------------------------------|------------------------|
| An individual   | <input checked="" type="checkbox"/> | <i>Go to section 2</i> |
| An organisation of individuals (for example, a partnership) | <input type="checkbox"/>            | <i>Go to section 3</i> |
| A public body (such as a local council)                     | <input type="checkbox"/>            | <i>Go to section 4</i> |
| A registered company or other corporate body                | <input type="checkbox"/>            | <i>Go to section 5</i> |

### 2 Applications from individuals

#### 2a Please give us the following details

Title	<input type="text" value="Mr"/>	
First name	<input type="text" value="Richard"/>	
Last name	<input type="text" value="Rogers"/>	<i>Go to section 6</i>

### 3 Applications from organisations of individuals

#### 3a Organisation details

Organisation name	<input type="text"/>
Type of organisation	<input type="text"/>
If 'Other', please specify	<input type="text"/>

#### 3b Main representative's details

Title	<input type="text"/>
First name	<input type="text"/>

Last name

**3c Second representative's details:**

Title

First name

Last name

**3d Other representative's details**

If relevant, please provide details of all other representatives on a separate sheet and tick here to show that you have done so.

☐

*Go to section 6*

**4 Applications from public bodies**

**4a Public body details**

Public body name

Type of public body

If 'Other', please specify

**4b Executive officer's details**

The executive is an officer of the public body authorised to sign on your behalf.

Title

First name

Last name

Position

*Go to section 6*

**5 Applications from a registered company or other corporate body**

**5a Company details**

Company name

Company registration number

Date of registration

If you are applying as a corporate organisation that is now a limited company, please provide evidence of your status and tell us the reference number you have given this document with this evidence.

Document reference

*Go to section 6*

**6 Your address**

**6a Your main (registered office) address**

For companies this *must* be the address on record at Companies House.

Address

Cae Ffynnon Abbeylands

Llanarmon-Yn-Ial

	Mold
	Clwyd
Postcode	CH7 4QU
Telephone - mobile	07973 445636
Telephone - office	
Email address	rogerstransport@googlemail.com

If you are applying as an organisation of individuals, every partner needs to give us their details, including their title. If necessary, continue on a separate sheet and tell us the reference you have given the sheet.

Document reference	
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**6b UK business address *only* if different from above**

Address	
Postcode	
Telephone - mobile	
Telephone - office	
Email address	

*Go to section 7*

**7 Contact details**

**7a Who can we talk to about your application?**

This can be someone acting as a consultant or 'agent' for you.

Title	Mr
First name	Graeme
Last name	Kennett
Address	360 Environmental Ltd
	The Oak Business Centre
	79 – 93 Ratcliffe Road

	Sileby
Postcode	LE12 7 PU
Telephone - mobile	07743 988951
Telephone - office	
Email address	graeme.kennett@360environmental.co.uk

**7b Who can we talk to about your operation?**

Same as the application contact in 7a	<input type="checkbox"/>
Title	
First name	
Last name	
Address	
Postcode	
Telephone - mobile	
Telephone - office	
Email address	rogerstransport@gmail.com

**7c Who can we talk to about your billing or invoice?**

Same as the application contact in 7a	<input type="checkbox"/>
Same as the operation contact in 7b	<input type="checkbox"/>
Title	Mr
First name	Richard
Last name	Rogers
Address	Cae Ffynnon Abbeylands
	Llanarmon-Yn-Ial

	Mold
	Clwyd
Postcode	CH7 4QU
Telephone - mobile	07973 445636
Telephone - office	
Email address	



# Application for an environmental permit:

## Part B2 – General: new bespoke permit

<p><b>Fill in this part of the form together with parts A and F1 or F2, if you are applying for a new bespoke permit.</b></p> <p><b>You also need to fill in part B3, B4, B5, B6, or B7 (depending on what activities you are applying for).</b></p> <p>Please check that this is the latest version of the form available from our website.</p> <p>Please read through this form and the guidance notes that came with it. All relevant guidance documents can be</p>	<p>found on our website.</p> <p><b>Contents</b></p> <ul style="list-style-type: none"> <li>1 About the permit</li> <li>2 About the site (not mobile plant)</li> <li>3 Your ability as an operator</li> <li>4 Consultation</li> <li>5 Supporting information</li> <li>6 Environmental risk assessment</li> <li>Appendix 1 – Low impact installation checklist</li> </ul>
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### 1 About the permit

#### 1a Discussions before your application

If you have had discussions with us before your application, give us the case reference or details on a separate sheet.

Case or document reference

n/a

#### 1b Is the permit for a site or for a mobile plant?

Note: The term 'mobile plant' does not include mobile sheep dipping unit.

Site ☐ *Go to section 2*

Mobile Plant ☒ *Go to section 1c*

#### 1c Have we told you during pre-application discussions that we believe that a mobile permit is suitable for your activity?

No ☐

Yes ☐

#### 1d Have there been any changes to your proposal since this discussion?

No ☐ *Go to section 3*

Yes ☐ Send us a description of the activity you want to carry out, highlighting the changes made since our pre-application discussions. Give us the reference, below.

Document reference

*Go to section 3*

### 2 About the site (not mobile plant)

#### 2a What is the site name, address, postcode and national grid reference?

Site name

Address

Postcode

National grid reference for the site (12 digit)

**2b How many regulated facility types are you applying for?**

- One ☒ *Go to section 2c*
- Two or more ☐ *Go to section 2d*

**2c What type of regulated facility are you applying for? (For one facility type only.)**

- Installation ☐ *Tick the relevant box in 2c1*
- Waste operation ☒ *Tick the relevant box in 2c2*
- Mining waste operation ☐ *Tick the relevant box in 2c3*
- Water discharge activity (all) ☐ *Go to section 3d*
- Medium Combustion Plant Only ☐ *Tick the relevant box in 2c4*
- Medium Combustion Plant/Specified Generator combined ☐ *Tick the relevant box in 2c4*
- Specified Generator Only ☐ *Tick the relevant box in 2c4*

What is the national grid reference for the regulated facility? (See the guidance notes on part B1 and note the different requirement for water discharge activities.)

- As in 2a above ☐
- Different from 2a ☐ Please fill in the national grid reference below
- National grid reference for the facility

**What is the type of activity?**

**2c1 Installation**

- Intensive farming installation
- Local authority (Part A (2) and Part B)
- Low impact installation (see question 2e below)
- Opra charged activity
- Directly associated activity
- Paragraph-17 installation

**2c3 Mining waste operation**

- Non-Opra charged activity
- Opra charged activity **Go to section 2e**

**2c2 Waste Operation**

- Landfill gas facility (closed landfill) ☐
- Opra charged activity ☐
- Tier 2 charged bespoke activity (see charging guidance for list) ☒
- Pet cemetery ☐

**2c4 Medium Combustion Plant/Specified Generator**

- Tier 2 charged complex bespoke activity (see charging guidance) ☐
- Tier 2 charged simple bespoke activity (see charging guidance) ☐

**2d What types of regulated facilities are you applying for? (For two or more facility types.)**

**Regulated Facility 1**

National grid reference (12 digit)

- |   |                          |                                     |
|---|--------------------------|-------------------------------------|
| Installation  | <input type="checkbox"/> | <i>Tick the relevant box in 2d1</i> |
| Waste operation                                       | <input type="checkbox"/> | <i>Tick the relevant box in 2d2</i> |
| Mining waste operation                                | <input type="checkbox"/> | <i>Tick the relevant box in 2d3</i> |
| Water discharge activity (all)                        | <input type="checkbox"/> | <i>Go to section 3d</i>             |
| Medium Combustion Plant only                          | <input type="checkbox"/> | <i>Tick the relevant box in 2d4</i> |
| Medium Combustion Plant/ Specified Generator combined | <input type="checkbox"/> | <i>Tick the relevant box in 2d4</i> |
| Specified Generator only                              | <input type="checkbox"/> | <i>Tick the relevant box in 2d4</i> |

**2d1 Installation**

- Intensive farming installation
- Local authority (Part A (2) and Part B)
- Low impact installation (see question 2e below)
- Opra charged activity
- Directly associated activity
- Paragraph-17 installation

**2d2 Waste Operation**

- |                          |  |                          |
|--------------------------|--|--------------------------|
| <input type="checkbox"/> | Landfill gas facility (closed landfill)                          | <input type="checkbox"/> |
| <input type="checkbox"/> | Opra charged activity  | <input type="checkbox"/> |
| <input type="checkbox"/> | Tier 2 charged bespoke activity (see charging guidance for list) | <input type="checkbox"/> |
| <input type="checkbox"/> | Pet cemetery   | <input type="checkbox"/> |

**2d3 Mining waste operation**

- Non-Opra charged activity
- Opra charged activity

**2d4 Medium Combustion Plant/Specified Generator**

- |                          |   |                          |
|--------------------------|---|--------------------------|
| <input type="checkbox"/> | Tier 2 charged complex bespoke activity (see charging guidance) | <input type="checkbox"/> |
| <input type="checkbox"/> | Tier 2 charged simple bespoke activity (see charging guidance)  | <input type="checkbox"/> |

**Regulated Facility 2**

National grid reference (12 digit)

- |  |                          |                                     |
|--|--------------------------|-------------------------------------|
| Installation   | <input type="checkbox"/> | <i>Tick the relevant box in 2d1</i> |
| Waste operation                                      | <input type="checkbox"/> | <i>Tick the relevant box in 2d2</i> |
| Mining waste operation                               | <input type="checkbox"/> | <i>Tick the relevant box in 2d3</i> |
| Water discharge activity (all)                       | <input type="checkbox"/> | <i>Go to section 3d</i>             |
| Medium Combustion Plant only                         | <input type="checkbox"/> | <i>Tick the relevant box in 2d4</i> |
| Medium Combustion Plant/Specified Generator combined | <input type="checkbox"/> | <i>Tick the relevant box in 2d4</i> |
| Specified Generator only                             | <input type="checkbox"/> | <i>Tick the relevant box in 2d4</i> |

**2d1 Installation**

- Intensive farming installation
- Local authority (Part A (2) and Part B)
- Low impact installation (see question 2e below)

**2d2 Waste Operation**

- |                          |  |                          |
|--------------------------|--|--------------------------|
| <input type="checkbox"/> | Landfill gas facility (closed landfill)                          | <input type="checkbox"/> |
| <input type="checkbox"/> | Opra charged activity  | <input type="checkbox"/> |
| <input type="checkbox"/> | Tier 2 charged bespoke activity (see charging guidance for list) | <input type="checkbox"/> |

Opra charged activity	<input type="checkbox"/>	Pet cemetery	<input type="checkbox"/>
Directly associated activity	<input type="checkbox"/>		
Paragraph-17 installation	<input type="checkbox"/>		
<b>2d3 Mining waste operation</b>		<b>2d4 Medium Combustion Plant/Specified Generator</b>	
Non-Opra charged activity	<input type="checkbox"/>	Tier 2 charged complex bespoke activity (see charging guidance)	<input type="checkbox"/>
Opra charged activity	<input type="checkbox"/>	Tier 2 charged simple bespoke activity (see charging guidance)	<input type="checkbox"/>

**Regulated Facility 3 etc.**

Do you want three or more facilities?

No ☐ *Go to section 2e*

Yes ☐ Use a separate sheet and send it to us with your application form. Tell us below the reference you have given this separate sheet.

Document reference  *Go to section 2e*

**2e Low impact installations (installations only)**

Are any of the regulated facilities low impact installations?

No ☒ *Go to section 2f*

Yes ☐

Please give us a description of your proposed activity telling us how you meet the conditions for a low impact installation and send it to us with your application form.

Document reference

Tick the box to confirm you have filled in the low impact installation checklist in Appendix 1 for each regulated facility. ☐

**2f Treating batteries**

Are you planning to treat batteries? (See the guidance notes on part B2.)

No ☒

Yes ☐ Tell us how you will do this, send us a copy of your explanation and tell us the reference you have given this explanation.

Document reference

**2g Multi-operator installation**

If the site is a multi-operator site (that is there is more than one operator of the installation) then fill in the table below the application reference for each of the other permits.

Table 1 – Other permit application references

**3 Your ability as an operator**

If you are only applying for a water discharge activity, you only have to fill in question 3d.

**3a Relevant offences – installations, waste operations, medium combustion plant and specified generators** (See the guidance notes on part B2)

Have you, or any other relevant person, been convicted of any relevant offence?

No ☒ *Go to section 3b*

Yes ☐ Please give details below

Title	<input type="text"/>
First name	<input type="text"/>
Last name	<input type="text"/>
Date of birth (DD/MM/YYYY)	<input type="text"/>
Position held at the time of the offence	<input type="text"/>
Name of the court where the case was dealt with	<input type="text"/>
Date of conviction (DD/MM/YYYY)	<input type="text"/>
Offence and penalty set	<input type="text"/>
Date any appeal against the conviction will be heard (DD/MM/YYYY)	<input type="text"/>

If necessary, use a separate sheet to give us details of other relevant offences, and tell us below the reference number you have given the extra sheet.

Document reference

**3b Technical ability - relevant waste operations only** (See the guidance notes on part B2)

**3b1** Which approved scheme are you using to show you have the suitable technical skills and knowledge to manage your facility?

CIWM / WAMITAB ☒

ESA / EU ☐

**3b2** Do you already hold the relevant, formal qualifications to manage your facility?

Yes ☐ Tick to confirm you've included all original and continuing competence evidence. ☒

No ☐ Tick to confirm you've included evidence you've registered with a Scheme. ☐

**3c Finances (installations, waste operations, medium combustion plant, specified generators and mining waste operations only)**

Do you or any relevant person have current or past bankruptcy or insolvency proceedings against you?

No ☒ *Go to section 3d.*

Yes ☐ Please give details below of the required set-up costs (including infrastructure), maintenance and clean up costs for the proposed facility against which a credit check may be assessed.

Please note: We may want to contact a credit reference agency for a report about your business's finances.

**Landfill, Category A mining waste facilities and mining waste facilities for hazardous waste only**

How do you plan to make financial provision (to operate a landfill or a mining waste facility you need to show us that you are financially capable of meeting the obligations of closure and aftercare)?

- |                |                          |
|----------------|--------------------------|
| Bonds          | <input type="checkbox"/> |
| Escrow account | <input type="checkbox"/> |
| Trust fund     | <input type="checkbox"/> |
| Lump sum       | <input type="checkbox"/> |
| Other          | <input type="checkbox"/> |

Provide a plan of your estimated expenditure on each phase of the landfill or mining waste facility.

Document reference

**3d Management systems (all)**

You can find guidance on management systems in our 'How to Comply' document. We have also developed environmental management toolkits for some business sectors which you can use to produce your own management system. You can get this by calling 0300 065 3000 or by downloading it from our guidance webpages.

**3d1** Does your management system meet the conditions set out in our guidance?

Yes ☒

No ☐

**3d2** What management system will you provide for your regulated facility?

- |   |                                     |
|---|-------------------------------------|
| EC Eco-Management and Audit Scheme (EMAS) | <input type="checkbox"/>            |
| ISO 14001                                 | <input type="checkbox"/>            |
| BS 8555 (Phases 1–5)                      | <input type="checkbox"/>            |
| Green Dragon                              | <input type="checkbox"/>            |
| Own management system                     | <input checked="" type="checkbox"/> |

**3d3** Make sure you included a summary of your environment management system with the application. Tick the box to conform you've done this and tell us the document reference, below.

☒

Document reference

Appendix 1`

**Water discharge activities:** Go to section 5.

**4 Consultation (fill in 4a to 4c for installations and waste operations and 4d for installations only. Fill in 4e for medium combustion plant and specified generators only)**

Could the waste operation or installation involve releasing any substance into any of the following?

**4a A sewer managed by a sewerage undertaker**

No ☒

Yes ☐ Please name the sewerage undertaker

**4b A harbour managed by a harbour authority**

No ☒

Yes ☐ Please name the harbour authority

**4c Direct into relevant territorial waters or coastal waters within the sea fisheries district of a local fisheries**

No ☒

Yes ☐ Please name the fisheries committee

**4d Is the installation on a site for which:**

**4d1** a nuclear site licence is needed under section 1 of the Nuclear Installations Act 1965?

No ☐

Yes ☐

**4d2** a policy document for preventing major accidents is needed under regulation 5 of the Control of Major Accident Hazards?

No ☐

Yes ☐

**4e Is the medium combustion plant or specified generator located within an Air Quality Management Area (AQMA)?**

No ☐

Yes ☐ What is the name of the AQMA?

What is the name of the Local Authority?

**5 Supporting information**

**5a Provide a plan or plans for the site (but not mobile plant)**

Mark the site boundary in green (See guidance notes on part B2 for more information on what should be included)

Document reference

**5b Provide the relevant sections of a site condition/baseline report, if this applies**

Document reference

If you are applying for an installation, tick the box to confirm that you have sent in a baseline report.

☐

**5c Provide a non-technical summary of your application** (see the guidance notes on part B2)

Document reference

Appendix 2 – Non – technical summary

**6 Environmental risk assessment**

Provide an assessment of the risks each of your proposed regulated facilities poses to the environment. The risk assessment must use H1 or an equivalent method.

Document reference

Appendix 3 – Risk assessment

**Appendix 1 – Low impact installation checklist** (see guidance notes on part B2)

Installation reference				
Condition	Response			Do you meet this?
A – Management techniques	Provide references to show how your application meets A.			Yes <input type="checkbox"/>
	References			No <input type="checkbox"/>
B – Aqueous waste	Effluent created	m3/day		Yes <input type="checkbox"/>
				No <input type="checkbox"/>
C – Abatement systems	Provide references to show how your application meets C.			Yes <input type="checkbox"/>
	References			No <input type="checkbox"/>
D - Groundwater	Do you plan to release any hazardous substances or non-hazardous pollutants into the ground?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Yes <input type="checkbox"/>
E – Producing waste	Hazardous waste	Tonnes per year		Yes <input type="checkbox"/>
	Non-hazardous waste	Tonnes per year		No <input type="checkbox"/>
F – Using energy	Peak energy consumption	MW		Yes <input type="checkbox"/>
G – Preventing accidents	Do you have appropriate measures to prevent spills and major releases of liquids? (See 'How to comply'.)	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Yes <input type="checkbox"/>
	Provide references to show how your application meets G.			No <input type="checkbox"/>
	Reference			
H - Noise	Provide references to show how your application meets H.			Yes <input type="checkbox"/>
	Reference			No <input type="checkbox"/>
I - Emissions of polluting substances	Provide references to show how your application meets I.			Yes <input type="checkbox"/>
	Reference			No <input type="checkbox"/>
J – Odours	Provide references to show how your application meets J.			Yes <input type="checkbox"/>
	Reference			No <input type="checkbox"/>
K – History of keeping to the regulations	Say here whether you have been involved in any enforcement action as described in Compliance History Appendix 1 explanatory notes.	Yes <input type="checkbox"/>	No <input type="checkbox"/>	



# Application for an environmental permit:

## Part B4 – New bespoke waste operation permit

<p><b>Fill in this part of the form, together with parts A, B2 and F1, if you are applying for a new bespoke permit for a waste operation.</b></p> <p>Please check that this is the latest version of the form available from our website.</p> <p>Please read through this form and the guidance notes that came with it. All relevant guidance documents can be found on our website.</p>	<p><b>Contents</b></p> <p>1 About your activities</p> <p>2 Emissions to air, water and land</p> <p>3 Operating techniques</p> <p>4 Monitoring</p> <p>Appendix 1 – Specific questions for waste facilities that accept clinical waste</p> <p>Appendix 2 – Specific questions for waste facilities that accept hazardous waste</p> <p>Appendix 3 – Specific questions for the recovery to land for agricultural benefit of compost like outputs from the treatment of mixed municipal solid wastes</p> <p>Appendix 4 – Specific questions for inert landfill</p>
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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 the waste activities (operations) you are applying for.

Fill in a separate table for each waste operation 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

Appendix 2

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

**1** This is the type of activity you want to do. For example, household, commercial and industrial waste transfer or in-vessel composting.

**2** Use the description from the guidance. Include any extra detail that you think would help to accurately describe what you want to do.

**3** 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).

**4** By 'capacity', we mean:

- 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.

**5** 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.

<b>Table 1a – Waste operations which do not form part of an installation</b>				
Waste operation name (See note 1)	Description of the waste operation (See note 2)	Annex I or Annex II (disposal and recovery) codes (See note 3)	Hazardous waste treatment capacity (if this applies). (See note 4)	Non-hazardous waste treatment capacity (if this applies). (See note 4)
Sludge liming	The liming of non-compliant biosolids with lime	R3	0	500
	Storage of biosolids	R13		
<b>For all waste operations</b>	Total storage capacity of non-hazardous waste (see note 5)	Total storage capacity of hazardous waste (see note 5)		Total annual throughput (tonnes each year)
	Deployment specific	0		Deployment specific

## 1b What waste types do you want to accept?

For each line in Table 1a, fill in a separate document to list those types of waste you will accept onto 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. Please provide the reference for each document.

Document references

Appendix 4

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

## 1c Deposit for recovery purposes (see guidance notes on part B4)

**1c1** Are you applying for a waste recovery activity involving the permanent deposit of waste in or on land, for construction, restoration or land reclamation?

No ☒ *Go to section 2*

Yes ☐

**1c2** Have we confirmed that we believe the activity is waste recovery?

No ☐ *We recommend you confirm the activity is recovery with us, before you apply.*

Yes ☐

**1c3** Have there been any changes to your proposal since the pre-application discussion?

No ☐

Yes ☐ *We recommend you confirm the effect of changes with us, before you apply.*

**1c4** Please send us a copy of your waste recovery plan that complies with the guidance on waste recovery plans and permits. You can access this guidance via the guidance pages of our website.

Document reference

## 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 waste operations (activities).

Fill in one table for each waste operation (activity). You can use Table 2 as a template. Please provide the reference for each document.

Document reference

Table 2 – Emissions (releases)				
Waste operation name		Mobile Lime Treatment		
<b>Point source emissions to air</b>				
Emission point reference and location	Source	Parameter	Quantity Unit	Unit
n/a				
<b>Point source emissions to water (other than sewers)</b>				
Emission point reference and location	Source	Parameter	Quantity Unit	Unit
n/a				
<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
n/a				
<b>Point source emissions to land</b>				
Emission point reference and location	Source	Parameter	Quantity Unit	Unit
n/a				

### 3 Operating techniques

#### 3a Technical standards

Fill in Table 3a for each operation you refer 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 B2 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 waste operation (activity). You can use Table 3a as a template. Please provide the reference for each document.

Document reference

Table 3a – Technical standards		
Waste operation name		
Description of waste operation	Relevant technical guidance note. You will need to refer to 'How to comply' for all permits.	Document reference (if appropriate)
	'How to comply'	
	CoP for the agricultural use of sewage sludge	

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

Document reference

Appendix 2

### 3b General requirements

Fill in a separate Table 3b for each waste operation (activity). You can use Table 3b as a template. Please provide the reference for each document.

Document reference

Table 3b – General requirements		
Waste operation name	Sludge liming	
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 n/a	
If the TGN or H1 assessment shows that odours are an important issue, send us your odour management plan	Document reference or references Appendix 6	
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 n/a	
If our fire prevention guidance or your H1 assessment shows that fire risk is an important issue, send us your fire management plan	Document reference or references n/a	

### 3c Information for specific sectors

For some of the sectors, we need more information to be able to set appropriate conditions in the permit. For those activities listed below, you must answer the questions in the related Appendix.

Table 3c – Questions for specific sectors	
Sector	Appendix

Clinical waste	See the questions in appendix 1
Hazardous and non-hazardous waste recovery and disposal	See the questions in appendix 2
Recovery to land for agricultural benefit of compost like outputs from the treatment of municipal mixed wastes	See the questions in appendix 3
Inert landfill	See the questions in appendix 4

## 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

## Appendix 1 – Specific questions for the clinical waste sector

---

Note: If your procedures are fully in line with the standards set out in EPR 5.07 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 facility?**

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 ☐ You must provide justification

Document reference

**6 Please provide a summary description of the treatment activities undertaken on the facility. 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 2 – Specific questions for the hazardous waste recovery and disposal sector**

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 facility?**

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 facility 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 facility. 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 or references



### **Appendix 3 – Specific questions for the recovery to land for agricultural benefit of compost like outputs from the treatment of mixed municipal solid wastes**

---

**1 Provide an accurate and reliable characterisation of your compost like outputs (CLO). This should be based on sampling and analysis of the CLO produced by the mechanical, biological treatment (MBT) process over a 12 month period and in accordance with section 2 of TGN 6.15**

Document reference

**2 Provide an agricultural benefit assessment for the use of your CLO. This should be based on section 2 of TGN 6.15 and should be signed and dated by an appropriate technical expert**

Document reference

**3 Provide a site specific risk assessment of risks to soil and food chain receptors. This should be based on Schedule 2 of TGN 6.15 and include a map with a green outline showing the boundary of the area being treated and include:**

- locations where the waste will be stored and spread;
- any spring, well or borehole used to supply water for domestic or food production purposes that is within 250 metres of the area being treated;
- any spring, well or borehole not being used for domestic or food production purposes that is within 50 metres of the area being treated;
- any European designated sites (candidate or Special Area of Conservation, proposed or Special Protections Area in England and Wales or Ramsar Site) or Sites of Special Scientific Interest (SSSI) which are within 500 metres of the place where waste is to be stored or spread;
- the location of public rights of way;
- any Groundwater Source Protection Zones;
- surface watercourses;
- any buildings or houses within 250 metres of the area being treated;
- land drains within the boundary.

Document reference

**4 Are the technical standards and measures fully in line with those set out in section 3 of TGN 6.15?**

Yes ☐

No ☐ Provide justification for departure from TGN 6.15 and a copy of the proposed technical standards, measures or procedures.

Document reference

## Appendix 4 – Specific questions for inert landfills

---

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

Document reference

### 2 Have you completed a hydrogeological risk assessment (HRA) for the site?

No ☐

Yes ☐ Document reference

Note: For inert landfills, this is only necessary in certain cases. Refer to our guidance 'Environmental Permitting Regulations: Inert Waste Guidance, Standards and Measures for the Deposit of Inert Waste on Land'. This can be downloaded from our guidance webpages.

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

Document reference

### 4 Have you completed a landfill gas risk assessment (LFGRA) for the site?

No ☐

Yes ☐ Document reference

Note: For inert landfills, this is only necessary in certain cases. Refer to guidance 'Environmental Permitting Regulations: Inert Waste Guidance, Standards and Measures for the Deposit of Inert Waste on Land'. This can be downloaded from our guidance webpages.

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

# Application for an environmental permit:

## Part F1 – Opra, charges and declarations

**Fill in this part for all applications for installations, waste operations, mining waste operations and groundwater discharges onto land.**

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

**For applications for water discharge and point source groundwater discharge activities you need to fill in part F2 instead.**

Please read through this form and the guidance notes that

came with it. All relevant guidance documents can be found on our website.

Contents

1 Working out charges

2 Opra profile (electronic)

3 Payment

4 The Data Protection Act 1998

5 Confidentiality and national security

6 Application checklist

7 Declaration

### 1 Working out charges (you must fill in this section)

You have to submit an application fee with your application. You can find out the charge by looking at our current environmental permitting charging scheme. This can be found on our 'How we regulate you' webpages. Please remember that the charges are revised on 1 April each year and that there is an annual subsistence charge (for site based permits) to cover the costs we incur in the ongoing regulation of the permit.

**Examples:** We have included examples to help you complete the table. The Tier 2 charge example is for an application for a 'New standard rule' permit. The Tier 3 charge example is for an installation Opra based charge for a normal variation (multiplier) application.

Note: for Opra charged Tier 3 Facilities you also need to complete an Opra profile (see section 2).

Table 1 – Working out charges				
Type of application	Tier 3 - Mobile plant (Bespoke)			
	Summary of charges			
<b>Tier 2 facilities</b> (including Part A(2) and Part B)	Charge identifier	Number of facilities	Charge for each facility (£)	Charges due (£)
<b>EXAMPLE:</b> SR2010 No12	S060A (W)	1	1,630.00	1,630.00
<b>Tier 3 facilities</b>				
<b>EXAMPLE:</b> Total Opra charging score for installations	90	x charge multiplier	57	5,130.00
Total Opra charging score for installations		x charge multiplier		
Total Opra charging score for waste operations		x charge multiplier		3784
Total Opra charging score for mining waste facilities				
Other charges (such as one-off assessments or fixed charge applications etc.)				
<b>Total charges due</b>				<b>3784</b>

---

## 2 Opra profile (does not apply to standard facilities, or other tier 2 permit applications)

If you are submitting a bespoke application, you must include a completed electronic copy in Excel of the *current* Opra spreadsheet. You can find the current Opra spreadsheet in the 'Our charges' section on our 'How we regulate you' webpages.

**For all variations, full and partial surrenders:** you will need to submit a copy of your current Opra profile based on your existing profile, not a new profile following the variation or surrender.

**For transfers:** you will need to submit a revised Opra profile to include your own operator performance. Note: this will not change the set transfer fee.

**Important:** your Opra profile (score) must match our records. If you are unsure about your current Opra profile (score), you should talk to your regulatory officer before submitting your application.

Tick this box to confirm that you have included the electronic OPRA spreadsheet ☒

## 3 Payment

### 3a How do you want to pay?

Tick an option below to show how you will pay.

- |   |                                     |                         |
|---|-------------------------------------|-------------------------|
| Electronic transfer (for example, BACS) | <input type="checkbox"/>            | <i>Go to section 3b</i> |
| Credit or Debit card                    | <input type="checkbox"/>            | <i>Go to section 3c</i> |
| Cheque                                  | <input checked="" type="checkbox"/> | <i>Go to section 3d</i> |
| Postal order                            | <input type="checkbox"/>            | <i>Go to section 3d</i> |

### 3b Paying by electronic transfer

If you choose to pay by electronic transfer use the following information to make your payment.

Company name: Natural Resources Wales  
Company address: Income Dept., PO BOX 663, Cardiff, CF24 0TP  
Bank: RBS  
Address: National Westminster Bank Plc, 2 ½ Devonshire Square, London, EC2M 4BA  
Sort code: 60-70-80  
Account number: 10014438

#### Reference number

You can use any reference number but we prefer the number to be 'EPR' followed by the first nine letters of your organisation name followed by a four-digit number.

For example, for a company named Joe Bloggs Ltd, the reference number might be EPRJOEBLOGGS0001. (Remember you can use any four-digit number at the end.)

The reference number you will provide will appear on our bank statements so we can check your payment. We may need to contact your bank to make sure the reference number is quoted correctly.

You should also email your payment details and payment reference number to [banking.team@naturalresourceswales.gov.uk](mailto:banking.team@naturalresourceswales.gov.uk) / [banking.team@cyfoethnaturiolcymru.gov.uk](mailto:banking.team@cyfoethnaturiolcymru.gov.uk) or fax it to 0300 065 3001 and enter it in the space provided below.

BACS reference	102401
Amount paid	3784

### Making payments from outside the UK

These details have changed. If you are making your payment from outside the United Kingdom (which must be received in sterling), our IBAN number is GB70 NWBK6070 8010 0144 38 and our SWIFT/BIC number is NWBKGB2L.

If you do not quote your payment reference number, there may be a delay in processing your payment and application.

### 3c Paying by credit or debit card

If you are paying by credit or debit card, please fill in the separate form CC1.

You can download this from our website or you can ask for one of our customer service providers to send one by post. We will destroy your card details once we have processed your payment. We can accept payments by Visa, MasterCard or Maestro UK card only.

### 3d Paying by cheque or postal order

You should make cheques or postal orders payable to Natural Resources Wales and they should be marked 'A/c Payee'.

We will not accept post-dated cheques (cheques with a future date written on them).

Cheque/ postal order number

Amount paid

## 4 The Data Protection Act 1998 and General Data Protection Regulations

We, the Natural Resources Body for Wales (hereafter "Natural Resources Wales"), will process the information you provide so that we can:

- deal with your application;
- make sure you keep to the conditions of the licence, permit or registration;
- process renewals; and
- keep the public registers up to date.

We may also process or release the information to:

- offer you documents or services relating to environmental matters;
- consult the public, public organisations and other organisations (for example, the Health and Safety Executive, local authorities, the emergency services, the Department for Environment, Food and Rural Affairs) on environmental issues;
- carry out research and development work on environmental issues;
- provide information from the public register to anyone who asks;
- prevent anyone from breaking environmental law, investigate cases where environmental law may have been broken, and take any action that is needed;
- assess whether customers are satisfied with our service, and to improve our service; and
- respond to requests for information under the Freedom of Information Act 2000 and the Environmental Information Regulations 2004 (if the Data Protection Act allows). We may pass the information on to our agents or representatives to do these things for us.

## 5 Confidentiality and national security

We will normally put all the information in your application on a public register of environmental information. However, we may not include certain information in the public register if this is in the interests of national security, or because the information is confidential

### Confidentiality

You can ask for information to be made confidential by enclosing a letter with your application giving your reasons. If we agree with your request, we will tell you and not include the information in the public register. If we do not agree with your request, we will let you know how to appeal against our decision, or you can withdraw your application.

**Only tick the box below if you wish to claim confidentiality for your application.**

Please treat the information in my application as confidential

☐

Tick the box to confirm you have provided evidence to support your confidentiality claim and give us the document reference, below.

☐

Document reference

### National security

You can tell the Welsh Ministers that you believe including information on a public register would not be in the interests of national security.

You must enclose a letter with your application telling us that you have told the Welsh Ministers and you must still include the information in your application. We will not include the information in the public register unless the Welsh Ministers decides that it should be included.

You can find guidance on national security in 'Core Environmental Permitting Guidance' published by Defra and available via the .Gov website.

**You cannot apply for national security via this application.**

### 6 Application checklist (you must fill in this section)

Tell us about the supporting evidence and information you have sent with this application.

**Application fee** - You must submit the correct application fee in line with our current charging scheme.

Tick the box to say you have included the correct fee.

☐

List all the documents you have included in Table 2. Please see the guidance notes for examples on how to complete the checklist.

**If the relevant information for a question forms part of a larger document, please specify the relevant section(s) of the document.** This will speed up the process of checking your application and making decisions.

If necessary, continue on a separate sheet and tell us the reference you have given the document below.

Document reference

Application forms

Table 2 – application checklist		
Question reference	Document title/ reference	Document section

### 7 Declaration

**You must read this section before making the declaration and sending your form to us.**

**For transfer applications - Both you and the person receiving the permit must make the declaration.**

Section 7d must be completed by the current holder *and* Section 7e must be completed by the proposed new holder.

A relevant person should make the declaration. You must be a relevant person or have the authority of a relevant person to sign this application on their behalf.

Relevant people means each applicant, and in the case of a company, a director, manager, company secretary or any similar officer or employee listed on current appointments in Companies House. In the case

of a Limited Liability Partnership (LLP), it includes any partner. If the permit holder is an organisation of individuals, each individual (or individual trustee) must complete the declaration.

To simplify and speed up the application process we recommend that the declaration is filled in by an officer of a company or one of the partners in a Limited Liability Partnership (LLP).

If you wish a manager, employee or consultant etc. to sign the declaration on behalf of a relevant person, we will need written confirmation from a relevant person; that is, an officer of the company, a partner in the LLP or the individual, confirming that the person has the authority to fill in the declaration.

If you are joint permit holders you should each fill in your own declaration. We have provided extra spaces for this below. Please send in a separate sheet with your application if you need more room for signatories.

Where the operator is the subject of any insolvency procedure, the declaration must be filled in by the official receiver/appointed insolvency practitioner.

#### **7a Are you signing the form on *behalf* of a relevant person?**

If you are *not* a relevant person, but want to sign the application on their behalf, you must include confirmation that you can do this.

I have included written confirmation from a relevant person to confirm I can sign on their behalf. ☐

#### **7b Does your application include a standard facility?**

If your application includes a standard facility, you also need to confirm that you are able to meet all relevant criteria of the standard rule set/sets for which you are applying.

I confirm that my standard facility will fully meet the rules that I have applied for. ☐

#### **7c Does your application include ecological survey information?**

If your application includes ecological survey information, please see the guidance notes on part F1 and tick the box below to confirm that you have no issue with us using information from any ecological survey you have supplied with your application.

I confirm I am happy for the ecological survey information I have supplied to be used as set out in the guidance. ☐

#### **7d Declaration**

**If you're transferring the permit, the current holder or holders should sign this section of the declaration, and the proposed new holder or holders of the permit should sign the declaration in section 7e.**

If you knowingly or recklessly make a statement which is false or misleading to help you get an environmental permit (for yourself or another person), you are committing an offence under the Environmental Permitting (England and Wales) Regulations 2016.

**I declare that the information in this application is true to the best of my knowledge and belief. I understand that this application may be refused or approval withdrawn if I give false or incomplete information.**

**I understand that if I knowingly or recklessly make a false or misleading statement:**

- **I may be prosecuted; and**
- **if convicted, I may have to pay a fine and/or go to prison.**

By signing below, you are confirming that you understand and agree with the declaration above.

Title	Mr	
First name	Richard	
Last name	Rogers	
On behalf of (if relevant)	Rogers Transport	
Today's date	15/04/2019	

If you knowingly or recklessly make a statement which is false or misleading to help you get an environmental permit (for yourself or another person), you are committing an offence under the Environmental Permitting (England and Wales) Regulations 2016.

**I declare that the information in this application is true to the best of my knowledge and belief. I understand that this application may be refused or approval withdrawn if I give false or incomplete information.**

**I understand that if I knowingly or recklessly make a false or misleading statement:**

- **I may be prosecuted; and**
- **if convicted, I may have to pay a fine and/or go to prison.**

By signing below, you are confirming that you understand and agree with the declaration above.

Title	<input type="text"/>	<input type="text"/>
First name	<input type="text"/>	
Last name	<input type="text"/>	
On behalf of (if relevant)	<input type="text"/>	
Today's date	<input type="text"/>	

**7e Declaration for the person or persons *receiving* the permit (transfers only)**

The persons 'receiving the permit' is the proposed new permit holder.

Note: If you cannot trace a person or persons holding the permit you may be able to transfer the permit without their declaration (in section 7d above). Please contact us to discuss this and supply evidence in your application to confirm you are unable to trace one or all of the permit holders.

If you knowingly or recklessly make a statement which is false or misleading to help you get an environmental permit (for yourself or another person), you are committing an offence under the Environmental Permitting (England and Wales) Regulations 2016.

**I declare that the information in this application is true to the best of my knowledge and belief. I understand that this application may be refused or approval withdrawn if I give false or incomplete information.**

**I understand that if I knowingly or recklessly make a false or misleading statement:**

- **I may be prosecuted; and**
- **if convicted, I may have to pay a fine and/or go to prison.**

By signing below, you are confirming that you understand and agree with the declaration above.

Title	<input type="text"/>	<input type="text"/>
First name	<input type="text"/>	
Last name	<input type="text"/>	
On behalf of (if relevant)	<input type="text"/>	
Today's date	<input type="text"/>	

If you knowingly or recklessly make a statement which is false or misleading to help you get an environmental permit (for yourself or another person), you are committing an offence under the Environmental Permitting (England and Wales) Regulations 2016.

**I declare that the information in this application is true to the best of my knowledge and belief. I understand that this application may be refused or approval withdrawn if I give false or incomplete information.**



**I understand that if I knowingly or recklessly make a false or misleading statement:**

- I may be prosecuted; and**
- if convicted, I may have to pay a fine and/or go to prison.**

By signing below, you are confirming that you understand and agree with the declaration above.

Title	<div></div>	<div></div>
First name	<div></div>	
Last name	<div></div>	
On behalf of (if relevant)	<div></div>	
Today's date	<div></div>	

# ENVIRONMENTAL PERMIT (BESPOKE MPP) APPLICATION

## Appendix 1

EMS - Summary

Prepared for: Richard Rogers



Version No:1

March 2019

# ENVIRONMENTAL MANAGEMENT SYSTEMS SUMMARY

SITE DETAILS	
Name of the applicant	<b>Richard Rogers</b>
Operator address	Cae Ffynnon Abbeylands Llanarmon – Yn - Ial Mold Clwyd CH7 4QU

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# **ENVIRONMENTAL MANAGEMENT SYSTEMS SUMMARY**

## **1 – INTRODUCTION**

This document 'Environmental Management System Summary' is the summary of the management system which sets out the policies, assessments or procedures that Richard Rogers has in place to ensure the protection of the environment during the activity of treating and recycling the materials accepted in to the operation. This document is a working document for staff to refer to.

This document has been written using "Guidance for the Recovery and Disposal of Hazardous and Non Hazardous Waste (SGN5.06)".

The operations will take place under a Mobile Plant Permit and associated deployment form and will, therefore, demonstrate that they will be able to be carried out without creating an issue. This document will be reviewed once operations have commenced under this permit to ensure that the Environmental Management System remains conducive to the operations. Richard Rogers will also ensure that the document remains fit for purpose and will be continually improved.

## **2 – MANAGEMENT**

### **2.1 General management**

The written management system identifies and minimises the risk of pollution arising from operations, maintenance, accidents, incidents, non-conformances and complaints. These procedures are further expanded upon throughout the document. The management system will reflect all risks identified within document Appendix 6 - Environmental Risk Assessment, a copy of this document is kept within the Accident Management Plan.

The procedures laid out in this document, identify areas of risk and ensure that the correct actions are taken, and that the work process is supervised in accordance with acceptable and applicable practices applicable to biosolids and the relevant regulations.

All site staff will work under the direct supervision of a member of staff who is fully conversant with all of the conditions the Permit. The Environmental Permit and Management Systems will be available in the site office so that they can be referenced by site staff, and all site staff will be familiar with the relevant rules regulations and acceptable work practices.

## **ENVIRONMENTAL MANAGEMENT SYSTEMS SUMMARY**

The Technically Competent Manager (TCM) will supervise operations under the terms of the Environmental Permitting Regulations 2010 (as amended) and their attendance will be recorded on site. Any changes to the applicable technically competent manager working at the site will be submitted to Natural Resources Wales (NRW).

### **3.2 Site management**

A management system has been implemented to control the use of the site that includes the following.

- Accident Management Plan
- Odour Management Plan
- Environmental Daily check sheet

### **3.3 Accident Management Plan**

The Accident Management Plan will be implemented on site and will take into account any recommendations notified by the operator and the Natural Resources Wales (NRW) guidance. This document will be reviewed every 4 years or as soon as practicable after an accident. Any identified changes will be implemented after the review.

### **3.4 Site security**

The operating sites will be chosen for its suitability as a lime treatment site for sewage sludge. Sites will consist of an area of impermeable surface that will drain to a sump so that all run off is captured. Where machinery is kept on site overnight it will be secured as required by insurance requirements.

### **3.5 Site notice board**

A site notice board shall be made of durable material, placed in a prominent position and will be kept in a good state of repair and inspected weekly. Any changes to the site information or damage to the noticeboard will be repaired. The information on the notice board will include:

- Operators' name
- Environmental Permit number
- Emergency contact name and telephone number
- That the site is permitted by Natural Resources Wales (NRW).and the relevant telephone number

# **ENVIRONMENTAL MANAGEMENT SYSTEMS SUMMARY**

## **4 - OPERATIONS**

### **4.1 Permitted activities**

Richard Rogers is intending to accept and treat, by liming, non-compliant biosolids to produce a compliant material suitable for use in agriculture under the Sludge (Use in Agriculture) 1989 Regulations.

Use of the treated materials will be as those defined by the Sludge (Use in Agriculture) 1989 Regulations, Cross Compliance Requirements (Statutory Management Requirement 1) and the Nitrate Pollution Prevention 2015 Regulations, or under the relevant S3 storage exemption.

### **4.2 Waste acceptance and storage**

Appendix 7 lists the waste types that will be recovered during the treatment process. There will be no hazardous waste accepted to the site under this permit.

As only contracted waste materials will be accepted on the site, it is unlikely that non-permitted waste will arrive on site.

### **4.3 The site boundary**

The activities on site shall not extend beyond the site boundary. A plan of the site, with the boundary edged in green will be included with each deployment application.

## **5 – EMISSIONS AND MONITORING**

### **5.1 Fugitive emissions of substances**

The site infrastructure and operations will be managed in such a way that the risk of fugitive emissions shall not cause pollution. The following measures will prevent and minimise any potentially polluting emissions:

- Materials will only be treated in the dedicated area within the site
- Storing waste only within the permitted area
- Storing waste only on impermeable surface
- Ensuring the joint seals on the site are maintained
- Cleaning following a spill of any material to avoid the generation of contaminated run off in any area not within the 'dirty' water area

## **ENVIRONMENTAL MANAGEMENT SYSTEMS SUMMARY**

### **5.2 Containment of liquids on site**

There will be no liquids, other than, potentially, liquid lime, accepted on site. Should liquid lime be used on site it will be stored on an impermeable surface in the road trailer in which it is transported. Any fuels are stored outside the permitted area in suitable facilities.

### **5.3 Inspection and maintenance of engineered containment**

All areas will be inspected prior to operations commencing, and then at least monthly to ensure the continuing integrity and fitness for purpose of their construction.

If any damage is detected which breaches the integrity of the engineered containment so that it no longer meets the specified standard, the affected area will be isolated with immediate effect and any necessary repairs will be documented.

### **5.4 Emissions to Air**

#### **5.4.1 Dust**

The treated and untreated biosolids will arrive as a moist material. The addition of lime is carried out in a confined space which will limit the escape of any dusty liming materials.

All machines are subject to low drop heights to reduce dust emissions and trailers will only be loaded following the steps specified that minimises air exchange in the trailers and reduces the amount of dust projected in to the air.

All lime will be stored in a contained manner to reduce the potential for dust releases. Where liquid lime is used this will not create a dust problem. Should powdered lime be used, the material is screw augured on to the sludge conveyor, this is enclosed by a hood, thereby creating an enclosed space.

Lime, both liquid and powdered, will be stored in a sealed silo.

#### **5.4.2 Odour**

The accepted materials are non – compliant biosolids and, as such, odour can be a problem should control measures not be employed. The control measures are described in the site specific Odour Management Plan.

### **5.5 Noise and vibration**

The levels of noise and vibration generated through on site operations should not cause annoyance outside the site. The treatment processes are carried out using



## **ENVIRONMENTAL MANAGEMENT SYSTEMS SUMMARY**

modern, well serviced construction equipment. The liming machine is a low impact machine and as the inputs are a damp, material little power is required to move the waste from one part of the process to another.

All on site mobile plant and machinery complies with legislative requirements and are fitted with fire extinguishers. If noise becomes an issue, possible solutions are to monitor the noise levels at different times of the day to identify the problem and to maintain equipment with specific respect to noise.

The site is located in open countryside and will only operate inside working hours.

Any complaints received shall be noted on the Complaint Form which includes a record that the complaint was investigated and conclusions acted upon.

### **5.6 Pest, scavenging animals and birds**

The permitted waste types accepted on site are unlikely to encourage scavenging animals, birds and other pests. If required, regular baiting of rodent 'bait stations' will be employed to eliminate any potential rodent problem.

### **5.7 Control of mud, debris and loose waste**

The treatment process is entirely contained and also contained within the impermeable surface.

Sites will be chosen that have a good internal road network so that no vehicles will come into contact with mud. The roads will be kept clean and in good state of repair.

### **5.8 Control, monitoring and reporting of dust, fibres and particulates**

The treatment and storage of the permitted waste types accepted on site will not generate dust. All treatment and storage will only be carried out on an impermeable surface.

Any dust generated from the use of wet liming materials will be insignificant and unlikely to cause nuisance beyond the site boundary.

Should powdered lime be used for the liming of the sludge a site-specific Dust Management Plan (DMP) will be produced for each deployment if required.

The treated sludges will not dry out and become friable as the sludges remain moist, lime addition rates are between 7 – 10% addition rates, just enough to ensure *bacti-kill* rather than to dry out the sludge totally.

## **ENVIRONMENTAL MANAGEMENT SYSTEMS SUMMARY**

### **5.9 Control of litter**

The accepted materials will not contain any litter.

### **5.10 Leaks and spillages**

Please see Accident Management Plan <sup>1</sup>

### **5.11 Fires on site**

Waste will not be burned on site. All reasonable precautions will be taken to prevent the outbreak of fire leading to the likely release of fugitive emissions. In the first instance the staff on site will extinguish the fire where possible. If the staff cannot deal with the fire then Fire Rescue Service will be contacted. All emergency numbers are within the Accident Management Plan. Natural Resources Wales (NRW) will be advised and the incident recorded.

## **6 - INFORMATION**

### **6.1 Records**

All records required by the permit will be legible, made as soon as reasonably practicable and be retained for a minimum of 6 years. Events effecting the environment shall be kept until the permit is surrendered.

A record shall be kept of the types and quantities of waste delivered and removed from the site for the life of the permit. These records will be kept at the offices of Richard Rogers and will be available for inspection by Natural Resources Wales (NRW) officers. These records will be kept secure from loss, damage or deterioration.

All waste dispatched to off-site recycling facilities, landfill or other treatment facilities will be accompanied by an appropriate Duty of Care Transfer Note.

### **6.2 Reporting**

A record of waste types and quantities removed from the site will be maintained and at the end of each quarter a summary will be sent to Natural Resources Wales (NRW) in an agreed format. All reports and notifications required by the Environmental Permit will be sent to Natural Resources Wales (NRW) using the contact details supplied in writing.

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<sup>1</sup> Accident Management Plan

## **ENVIRONMENTAL MANAGEMENT SYSTEMS SUMMARY**

### **6.3 Notifications**

Natural Resources Wales (NRW) shall be notified when any machinery, breakdown or failure of equipment causes significant pollution. Natural Resources Wales (NRW) will also be informed when there is a breach of limit or when there is significant environmental effect. The confirmation of such an event shall be submitted in writing.

# ENVIRONMENTAL PERMIT (BESPOKE MPP) APPLICATION

## Appendix 1

EMS - Summary

Prepared for: Richard Rogers



Version No:1

March 2019

## NON-TECHNICAL SUMMARY

### 1. Introduction

The purpose of this document is to give a brief overview of the treatment activity that is requested for a bespoke activity at various locations to be notified using the relevant mobile plant deployment form. The activity is for the treatment with lime of *sludges from the treatment of urban waste water*, EWC code 19 08 05.

### 2. Operation

The purpose of the operation is to receive non-compliant bio solids and to treat by liming to a standard which makes them compliant with the Code of Practice for agricultural use of sewage sludge. In order to be compliant with the Safe Sludge Matrix and the Sludge (Use in Agriculture) Regulations 1989 the sludges must be treated to a level termed 'enhanced treated'. Enhanced treated sludge will be 'free from *Salmonella* and will have been treated so as to ensure that 99.9999% pathogens have been destroyed (a 6 log reduction)' treated sludge will also conform to the Biosolids Assurance Scheme HACCP Plan.

### 4. Waste types

The site will only accept the following waste materials for lime treatment.

EWC Codes	Waste description
19 08 05	Sludges from the treatment of urban waste water

### 5. Environmental Impact of the development

It is considered that the liming of the non-compliant sludge will present an increased odour risk at the treatment site. However, a site specific Odour Management Plan will be drawn up for each deployed site that will detail and control any potential increase odour risks from the operation. The mobile liming plant is fitted with a highly effective odour neutralization system.

### 6. Summary and conclusions

The activity is considered to be an R3 activity (*Recycling/reclamation of organic substances which are not used as solvents (including composting and other biological transformation processes)*) activity, as it will treat the sludge with lime in order to facilitate its recovery as a fertilizer to land.

The sewage sludge will be recycled to agricultural land once the required analysis has been undertaken.

# ENVIRONMENTAL PERMIT (BESPOKE MPP) APPLICATION

## Appendix 3

Environmental Risk Assessment

Prepared for: Richard Rogers



March 2019

Risk assessment for bespoke lime treatment permit

Waste Operation:

Mobile plant for the treatment of non - compliant biosolids with lime

Location:

Applies to all potential locations.

Location of environmentally sensitive sites (km / m):

Greater than 200m (see below)

Risk assessment carried out by:

360 Environmental Ltd

Date:

04-Apr-19

The scope of the permit and associated rules is defined by the following risk criteria:

Parameter 1

Permitted activities - The treatment of non - compliant biosolids with lime (R3 and R13).

Parameter 2

Permitted waste types - 19 08 05

Parameter 3

Quantity of waste accepted at the facility: not applicable.

Parameter 4

Unless otherwise stated in the agreed deployment form, contaminated materials, substances or products shall be stored and treated on an impermeable surface with sealed drainage.  
Unless otherwise stated in the agreed deployment form, contaminated materials, substances or products shall be stored and treated on an impermeable surface with sealed drainage;  
Relevant deployment form - The operator will only carry out the activity at a particular location, in accordance with a deployment form that has been agreed with the Agency. The form will specify the technology and plant to be used, the waste materials that can be accepted, release points and release limits etc.

Data and information				Judgement				Action (by permitting)	
Receptor	Source	Harm	Pathway	Probability of exposure	Consequence	Magnitude of risk	Justification for magnitude	Risk management	Residual risk
What is at risk? What do I wish to protect?	What is the agent or process with potential to cause harm?	What are the harmful consequences if things go wrong?	How might the receptor come into contact with the source?	How likely is this contact?	How severe will the consequences be if this occurs?	What is the overall magnitude of the risk?	On what did I base my judgement?	How can I best manage the risk to reduce the magnitude?	What is the magnitude of the risk after management? (This residual risk will be controlled by Compliance Assessment).
Local human population	Releases of particulate matter (dusts) and micro-organisms (bioaerosols).	Harm to human health - respiratory irritation and illness.	Air transport then inhalation.	Medium	Medium	Medium	There is potential for exposure if anyone is living or working close to the site (apart from the operator and employees). There is potential for increased dust generation from permitted activities during prolonged dry periods e.g. summer months.	Lime treatment will be carried out under controlled conditions and is unlikely to give rise to dust emissions.	Low

Local human population	As above	Nuisance - dust on cars, clothing etc.	Air transport then deposition	Medium	Medium	Medium	As above. Local residents often sensitive to dust.	As above	Low
Local human population, livestock and wildlife.	Litter	Nuisance, loss of amenity and harm to animal health	Air transport then deposition	Medium	Low	Medium	Local residents often sensitive to litter.	As above. Waste materials are unlikely to include litter.	Low
Local human population	Waste, litter and mud on local roads	Nuisance, loss of amenity, road traffic accidents.	Vehicles entering and leaving site.	Medium	Medium	Medium	Road safety, local residents often sensitive to mud on roads.	Exiting transport will remain on surfaced roadways and will clean wheels before travel on the public highway should the need arise.	Low
Local human population	Odour	Nuisance, loss of amenity	Air transport then inhalation.	Low	Low	Medium	Local residents often sensitive to odour.	A site specific Odour Management Plan will be provided with each deployment application..	Low
Local human population	Noise and vibration	Nuisance, loss of amenity, loss of sleep.	Noise through the air and vibration through the ground.	Medium	Medium	Medium	Local residents often sensitive to noise and vibration	Liming will only be carried out using the same technology and only during normal business hours.	Low
Local human population	Scavenging animals and scavenging birds	Harm to human health - from waste carried off site and faeces. Nuisance and loss of amenity.	Air transport and over land	Low	Medium	Low	Permitted wastes unlikely to attract scavenging animals and birds but may become nesting / breeding sites.	Biosolids will be kept on site for the minimum time required to reduce, as far as possible, to reduce the potential for nuisance.	Very low
Local human population	Pests (e.g. flies)	Harm to human health, nuisance, loss of amenity	Air transport and over land	Low	Medium	Low	Permitted waste types unlikely to attract pests.	As above	Very low
Local human population and local environment	Flooding of site	If waste is washed off site it may contaminate buildings / gardens / natural habitats downstream.	Flood waters	Low	Medium	Low	Permitted waste types washed off site will add to the volume and hazard of the local post-flood clean up workload.	Treatment sites will not be located within areas with a high risk of flooding.	Very low



Local human population and / or livestock after gaining unauthorised access to the waste operation	All on-site hazards: wastes; machinery and vehicles.	Bodily injury	Direct physical contact	Medium	Low	Low	Permitted waste types are unlikely to attract unauthorised access therefore only a low magnitude risk is estimated	Lime will be kept securely. Biosolids will be unattractive to trespassers.	Low
Local human population and local environment.	Arson and / or vandalism causing the release of polluting materials to air (smoke or fumes), water or land.	Respiratory irritation, illness and nuisance to local population. Injury to staff, firefighters or arsonists/vandals. Pollution of water or land.	Air transport of smoke. Spillages and contaminated firewater by direct run-off from site and via surface water drains and ditches.	Medium	Low	Low	Permitted waste types will not normally be flammable, so only a low magnitude risk is estimated.	As above. See AMP for spillages.	Low
Local human population and local environment	Accidental fire causing the release of polluting materials to air (smoke or fumes), water or land.	Respiratory irritation, illness and nuisance to local population. Injury to staff or firefighters. Pollution of water or land.	As above.	Low	Low	Low	As above	Permitted activities do not include the burning of waste.	Very low
All surface waters close to and downstream of site.	Spillage of liquids, leachate from waste, contaminated rainwater run-off from waste e.g. containing suspended solids.	Acute effects: oxygen depletion, fish kill and algal blooms	Direct run-off from site across ground surface, via surface water drains, ditches etc.	Medium	Medium	Medium	Permitted waste types include sludges so only a medium magnitude risk is estimated. There is potential for contaminated rainwater run-off from wastes stored outside especially during heavy rain, which will be directed to a sump.	All liquids (fuels) shall be provided with secondary containment. Run-off will be captured by a sealed drainage system and specified on the site deployment form.	Very low
All surface waters close to and downstream of site.	As above	Chronic effects: deterioration of water quality	As above. Indirect run-off via the soil layer	Medium	Low	Low	As above.	As above	Low
Abstraction from watercourse downstream of facility (for agricultural or potable use).	As above	Acute effects, closure of abstraction intakes.	Direct run-off from site across ground surface, via surface water drains, ditches etc. then abstraction.	Medium	Medium	Medium	As above.	As above	Low

Generic Risk Assessment SR2008No27GRA

Groundwater	As above	Chronic effects: contamination of groundwater, requiring treatment of water or closure of borehole.	Transport through soil/groundwater then extraction at borehole.	Medium	Low	Medium	Waste activity will be temporary, but there is no potential for contaminated run-off to reach groundwater as the treatment area will be located on an impermeable surface with sealed drainage.	As above	Very low
Local human population	Contaminated waters used for recreational purposes	Harm to human health - skin damage or gastro-intestinal illness.	Direct contact or ingestion	Low	Medium	Low	Unlikely to occur, but might restrict recreational use.	As above	Very low
Protected sites - European sites and SSSIs	Any	Harm to protected site through toxic contamination, nutrient enrichment, smothering, disturbance, predation etc.	Any	Low	Medium	Low	Waste operations may cause harm to and deterioration of nature conservation sites.	The site specific requirements to protect any neighbouring sites will be stated in the required MPP2 deployment form.	Low

**Notes:** Red triangle indicates comment containing supporting information

Yellow columns contain drop down menus that allow automatic evaluation of risk in green column

# ENVIRONMENTAL PERMIT (BESPOKE MPP) APPLICATION

## Appendix 4

Waste types

Prepared for: Richard Rogers



Version 1

March 2019

## APPENDIX 4 - WASTE TYPES



It is proposed that the waste materials stated below would be listed in a separate appendix in the permit. This would allow for the type of deployment to be readily recognised by assessing officers.

EWC	Description
19	<b>WASTE FROM WASTE MANAGEMENT FACILITIES, OFF-SITE WASTE WATER TREATMENT PLANTS AND THE PREPARATION OF WATER INTENDED FOR HUMAN CONSUMPTION AND WATER FOR INDUSTRIAL USE</b>
19 08	Waste from waste water treatment plants
19 08 05	Treated sludges from treatment of urban waste water

# ENVIRONMENTAL PERMIT (BESPOKE MPP) APPLICATION

## Appendix 5

Operating techniques

Prepared for: Richard Rogers



Version 1

March 2019

Lime treatment of wastewater biosolids is a well understood process and is used at waste water treatment works as a n effective method of achieving conventional, or enhanced, treated sludge.

Lime stabilisation reduces the generation of hydrogen sulphide (H<sub>2</sub>S) and other odourous gases, can achieve a 6 log reduction in pathogens and can increase the dry content of the sludge.

This document defines the general management and operational procedures for mobile plant for the storage and treatment by lime stabilisation of non-compliant biosolids in accordance with company technical method statements, risk assessments, industry guidelines and any current regulations.

This management plan covers the following activities;

Activity description	Activity limits
Storage of wastes prior to lime stabilisation	Secure storage of wastes in accordance with the regulations; <ul style="list-style-type: none"> <li>Sewage sludge will be stored in accordance with the agreed deployment form for the site.</li> </ul>
Lime stabilisation of biosolids	Stabilisation/treatment of biosolids by mixing with lime to specifically raise the pH above 12 for two hours
Storage of stabilised sludge	Secure storage of wastes in accordance with the regulations; <ul style="list-style-type: none"> <li>Sewage sludge will be stored in accordance with the S2 exemption for the field site.</li> </ul>

The spreading of the treated biosolids will be carried out under the Sludge (Use in Agriculture) Regulations 1989.

## 1. Introduction

This application is for a bespoke environmental permit under the Environmental Permitting Regulations (England and Wales) 2010 for the treatment of non – complaint biosolids with lime. This will enable it to be applied to suitable agricultural land.

## 2. Materials to be treated

The materials that are intended to be treated are listed with Appendix 4.

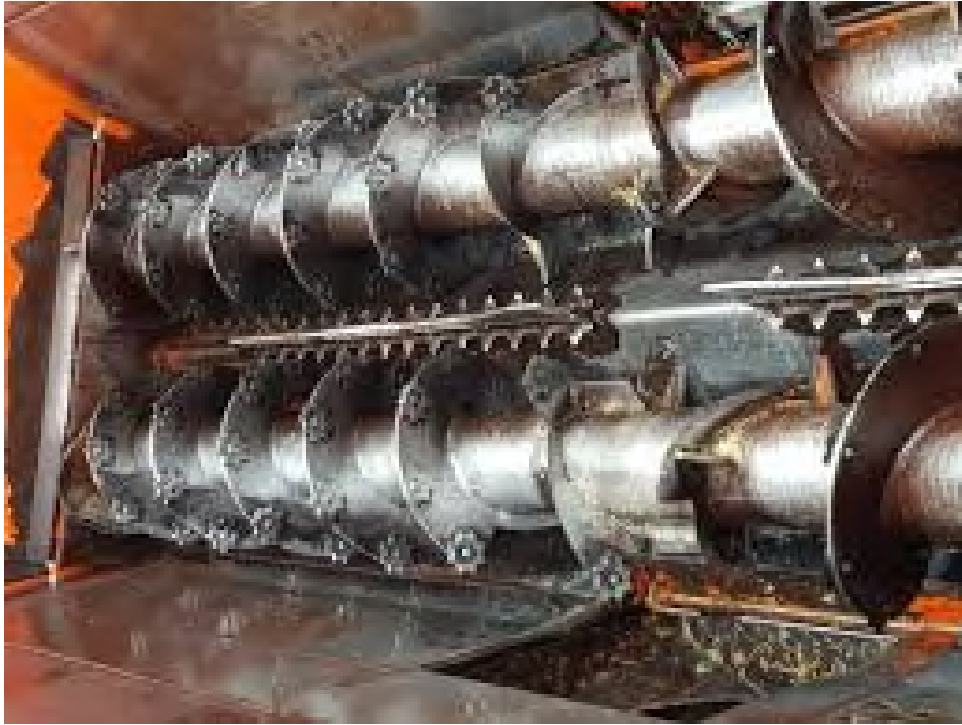
## 3. Operation – non – compliant biosolids treatment

The non – compliant material will be treated using specialist equipment that allows for the mixing of lime with the biosolids to ensure that all the biosolid material is treated with lime.

Liming equipment will be mobile tractor driven twin auger mixer with weigh cells similar that shown below.



A measured amount of bio-solids will be loaded into the mixer, the machine will then be switched on so that the mixer augers start to agitate the biosolids. Once underway, the measured amount of lime will be added slowly to the mix to ensure that a consistent mixture is produced. Once the required amount is delivered the mixing will continue to ensure that the lime is thoroughly mixed with the bio-solids. The action of the combined auger and paddle mixer rapidly, thoroughly, and continuously mix the ingredients to produce a continuous discharge of uniform quality material.



Loading of this will be carried out by Telehandler or similar. Discharge of mixed material will be by side delivery conveyor system.

Odour mitigation system when required will be mobile Odourmaster Oscillating Fan systems, these will disperse scented Atom Neutralisers mixed with water to break down odour molecules.

## **4. Site throughput**

The throughput for each site will be determined and stated in each site specific MPP2 deployment application.

Specific application rates will be calculated for each field to ensure that the benefits are realized and that no disbenefit occurs.



# ENVIRONMENTAL PERMIT (BESPOKE MPP) APPLICATION

## Appendix 6

Odour Management Plan

Prepared for: Richard Rogers



Version No:1

April 2019

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Annex B: Sniff testing protocol

Annex C: Odour complaint report form

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Document name:	Odour Management Plan		
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## 1 Introduction

The following document outlines the odour management procedures that will be put in place to control odourous emissions from the treatment of Biosolids (19 08 05/02) with lime by the use of mobile liming plant at various locations to ensure that the risk of adverse odour impact at nearby sensitive receptors is minimised as far as possible.

The Mobile Liming Plant has yet to be operated by Richard Rogers t/a Rogers Transport, although the technology has been in use for many years at various water utility companies. As such this Odour Management Plan (OMP) is based on current working practices which have been based on previous experience. On site practices are continually evolving from these described and potential risks may vary. These will be captured in a review of the document not less than every 12 months.

The document has been prepared on the basis of the following primary references:

- Environment Agency H4 Odour Management guidance (published March 2011)
- Odour Control in Wastewater Treatment – A Technical Reference Document (UKWIR USE published June 2001)
- Code of Practice on Odour Nuisance from Sewage Treatment Works (DEFRA 2006)

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## 2 Site location and description

### 2.1 Description of the site and its surroundings

As the operation is for Mobile Lime Treatment the site and its receptors will vary. As such the site-specific details will be assessed individually and submitted with the relevant deployment.

### 2.2 Overview of site operations

#### 2.2.1 Feedstock reception.

Incoming vehicles entering the site report to the office where their details are reviewed to ensure that the load is acceptable. The vehicle is weighed on the weighbridge, where available, and then directed to the Biosolids storage area for tipping.

Delivery vehicles will deposit the feedstock material in the dedicated area where the load is visually inspected by site staff to check for, and to remove any foreign materials. Any highly odourous material is mixed with lime and treated as a priority. The discovery of any contaminated material/foreign objects is recorded in the site diary, the customer informed, and a written explanation requested along with the corrective actions to minimise repeat events.

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All such events will be recorded in the site diary and a record of correspondence with the customer will be kept on file in the main office.

Any liquids generated in the Feedstock Storage Area (FSA) will be collected by drainage channels and directed to a collection sump.

All feedstock will arrive at the treatment site via direct delivery by bulk haulage, from various Wastewater Treatment Works (WWTW) in sealed and sheeted vehicles. All vehicles entering and leaving the site are sheeted and washed down where appropriate.

### **2.2.3 Biosolids treatment**

Delivered biosolids will be mixed as required in the treatment plant prior to discharge to the storage area on site.

The standards for compliance with the Code of Practice for the Agricultural use of Sewage Sludge is given in Appendix 1. Sludge is loaded by the on-site teleporter in to the treatment plant situated adjacent to the FSA.

Spillages are kept to a minimum with any material that has fallen to the ground caught with the next bucket load and loaded in to the treatment plant.

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### **2.2.4 Sludge storage**

Delivered feedstocks that are not to be treated immediately are stored in the FSA prior to liming. When the sewage sludge is to be stored, they will be stored in a windrow type arrangement and covered with straw. This prevents the further development of anaerobic conditions developing and producing more odours. Experience has shown that straw is an effective method of reducing odours.

This amount is kept to no more than that that can be treated in two working days to prevent excess odours and runoff being generated. Limed sewage sludge has a lower odour generation potential than that requiring treatment.

### **2.2.5 General housekeeping**

Any internal roads will be regularly swept and cleaned.

## **3. Review of potential sources, pathways and receptors**

### **3.1 Potential sources**

#### **3.1.1 Review of the mechanisms that may lead to odour generation**

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There are many chemical species that have been detected in Waste Water Treatment Works (WWTW) odours. In addition to hydrogen sulphide and other pollutants such as ammonia, there are a wide variety of organic sulphides and organic nitrogen – based compounds along with some oxygenated organic compounds and organic acids.

The primary odours from WWTW are biogenic<sup>1</sup> due to the degradation of organic matter by microorganisms under anaerobic conditions. The development of anaerobic conditions in biosolids is often referred to as ‘septicity’, this can be onset by elevated temperature, high Biological Oxygen Demand (BOD), high sulphate levels and the presence of reducing chemicals. Anaerobic activity leads to the production of methane (CH<sub>4</sub>), hydrogen sulphide (H<sub>2</sub>S), ammonia (NH<sub>3</sub>), organic sulphur, thiols (mercaptans), amines, indole, and skatole. During the fermentation phase of anaerobicity, volatile fatty acids (VFAs), alcohols, aldehydes and ketones can also be produced.

However, odour which is not typical of anaerobic conditions can also be generated by the mechanisms generated including ammonia odour from the reactions by the liming operation.

The rate of emission of odour is also influenced by the surface area of the material presented to the atmosphere. As a result, the emission rate of odour tends to be higher from activities which involve agitation of material (e.g. loading and unloading of materials, lime treatment etc).

### 3.1.2 Identification of sources and factors that influence emissions

A conceptual odour emissions model for the site, detailing the range of emission sources and potential variables effecting odour generation, has been developed and is presented below in Table 1:

Area	Odour source	Factors that influence odour emissions	Potential for variation
Feedstock storage area	Reception and mixing	Quality of the material (influenced by moisture content, organic content, age, degradation, ambient temperature etc)	Seasonal variation – sludge cooler and potentially less odourous in winter months. A higher ambient temperature in summer may increase the odour emission potential. Sludge odour may vary due to the different

<sup>1</sup> produced or brought about by living organisms

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			characteristics of each WWTW. There is slight potential for variation between loads.
		Quantity and throughput of material through process	Little seasonal variation in quantities. Varies during the day with peak quantities between 11.00 to 14.00.
Sump	Runoff and dirty water	Effectiveness of biological treatment, quantity and quality of leachate	Moderate potential for variation; primarily dependent on quantity of rainfall, quantity of stored feedstock, volume reused. Greatest odour emissions would be anticipated during extended periods of dry weather when leachate is least diluted.
Storage areas	Spilled biosolids	Cleanliness	Potential substantial increase in magnitude of odours generated if anaerobic conditions prevail if the treated biosolids area is not regularly emptied and cleaned.
Internal roadways	Treated/untreated biosolids deposited on the roadways	Cleanliness	If internal roads are allowed to become dirty, odourous material will be tracked out from the site, thereby increasing the amount and size of odour sources.

### 3.2 Pathways

Odours emitted from the sources identified above are emitted to air and have the potential to be conveyed to the nearby receptors via transfer through the atmosphere.

The extent to which odour is detectable downwind and the intensity and character of such odours is dependent upon the following factors:

- The nature and magnitude of odourous emissions released from the source.
- Wind direction and wind speed.
- Atmospheric turbulence (vertical and horizontal) and the level of dilution and dispersion odours undergo as they travel downwind.

All of these factors can exhibit substantial variation over time.

### 3.3 Receptors

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The identification of potentially sensitive receptors has been conducted on the basis that the level of exposure to odours that is likely to generate annoyance in residential premises (i.e. people's homes) tends to be considerably lower than the levels which may generate annoyance at commercial premises where higher tolerance to odour exposure can generally be expected.

The key, potentially sensitive, receptors will be listed in appendix 2 of the site specific OMP and will show the nearest sensitive receptors and their location relative to the site. The treatment site will be located within the **bold green line** and the nearest receptors will be labelled and are indicated by red hatched areas.

## **4 Odour management and control measures**

### **4.1 Principles of odour control**

The following key factors are of relevance in controlling and minimising odour emissions:

- Inventory control
- Process control

#### **4.1.1 Inventory control**

Inventory control is a key part of the odour control strategy for the treatment site. As the majority of the odours will potentially be generated by the feedstock received, they have been done so under long-term contracts to enable a high level of operator experience in handling the specific feedstock to be developed. Additionally, Richard Rogers t/a Rogers Transport will process deliveries of non – compliant biosolids from its suppliers utilising a "just in time" approach. Accordingly, feedstock materials are to be despatched to the site and stored temporarily so that the untreated volumes on site can be treated within no more than one week from delivery. This will prevent large volumes of material sitting in the storage area, thus reducing the potential for odourous emissions.

#### **4.1.2 Process control**

The most important parameters in maintaining effective management and control of the odour generation process are temperature, moisture and condition of the feedstock. The importance of each of these factors is discussed below.

##### *Moisture content*

Water acts as a medium for the many biochemical reactions taking place within the feedstock mass and is therefore an essential ingredient for successful odour control. Excessive moisture

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is however detrimental due to the inhibition of the movement of oxygen through the material, decrease in material porosity and the increased onset of anaerobic conditions. The optimal moisture content is considered to be in the range of 45-60%.

At the treatment site, if wet materials are delivered to site, drier feedstock will be mixed to reduce overall moisture content to desirable levels.

#### *Minimisation of evaporation of odourous chemicals*

An additional objective of the odour control strategy applied is the prevention or reduction of the evaporation of odourous chemicals from odourous materials on site. A number of measures are applied to achieve this objective and these are detailed within this plan. These include:

- a) Ensuring that all vehicles equipped with sheets are sheeted when entering and leaving the site.
- b) Limiting uncovered storage to as short a time as possible to avoid direct sunlight
- c) Using an Odourmaster Oscillating Fan suppression system situated at the Feedstock Reception Area to increase odour suppression. The system is set to run whilst liming plant loading and liming is taking place. Manual override will allow continual misting as required (including before, during, and after unloading and loading wastes). If necessary, further moisture can be applied to the surface of stockpiles via the use of water hoses installed within the storage area. However, staff must ensure that stockpiles are not saturated, leading to standing water with the potential to generate odour.
- d) Material stockpiles will be minimised in the storage area. Feedstock is placed against purpose built push walls where available. These measures will help reduce the surface area of wastes, thus reducing the potential for evaporation. Highly odourous WWT sludge will not be left in the treatment area uncovered overnight.

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#### **4.1.3 Treatment of odourous air**

While all opportunities to prevent or minimise the formation of odours will be taken, the use of treatment techniques is appropriate where additional controls may be deemed necessary.

Should the treatment of collected odourous airstreams be required, the treatment technology applied will be matched to the types of odourous compounds present and the characteristics of the airflow.

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At each MTL treatment site a variety of containment and treatment options will be considered in proportion to the risks posed by the activities conducted.

## **4.2 Site specific control measures**

The following site-specific odour control measures will be applied at each MTL treatment site.

### **4.2.1 Feedstock reception operations**

#### *Treatment*

All feedstock reception, mixing and vehicle loading operations is conducted within the Feedstock Storage Area which is covered by a dedicated air treatment system. To ensure the risk of odour escape during vehicle unloading events is minimised, vehicle sheets and tailgates are closed without delay.

Good discipline regarding the acceptance of vehicles is paramount in reducing the risk of odour escaping from the site. Site staff is trained accordingly to ensure that:

- a) In the event that two vehicles arrive at site to deliver waste, the operator will instruct one vehicle to wait until the first vehicle has been processed. On no account will vehicles be allowed to unload outside the Feedstock Storage Area or to allow the second vehicle to follow the first and tip simultaneously.
- b) All tailgates are closed as soon as the load is discharged.
- c) All vehicles are sheeted on arrival and exit from the site.

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An inspection regime is in place to visually inspect the integrity of the Feedstock Storage Area base and any pushwalls on a weekly basis. The inspecting site staff member will also check and clean drainage channels where signs of build-up are detected.

#### *Inventory control/receipt and processing of feedstock*

Sewage sludge delivered to the MTL treatment site will be carefully managed to minimise the risk of problematic feedstock (i.e. too odourous or too contaminated) being delivered. Untreated feedstock will be managed to ensure that it is not held uncovered for more than 72 hours prior to liming.

Sludge deliveries to the MTL site will be controlled by the operator's main office. Accordingly, approximately 90% of biosolids delivered to site will be at a time of choosing by the site. This will ensure that large stockpiles of non – compliant sewage sludge do not accumulate in the Feedstock Storage Area. Rather, the aim is that deliveries are managed on a “just in time basis”, with sludge being mixed and treated as it arrives. This approach is possible, due to the

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fact that all of the biosolids delivered into the site will be via regular contracts and by dedicated vehicles. Accordingly, logistics can be planned to avoid “peaks” and “troughs” of material inputs.

Amounts of materials and times they will be kept on site will be detailed within each deployment application.

The Feedstock Storage Area will be operated to allow separate areas for treating and depositing material. This means that treatment operations will not be unduly impacted by vehicle traffic (i.e. the treatment plant is located in a dedicated area and will not have to be continually moved to accommodate tipping vehicles).

Loads arriving at the site will be assessed by site staff for potential to cause increased odour problems (discussions will be held with the driver regarding the source and whether it is known to be unusually odorous etc.) and if necessary a more detailed inspection involving unsheeting or opening the doors of the vehicle undertaken. If necessary the load will be treated at this point. An entry will be made in the site diary. The mechanism / process through which unacceptable loads will be sent back to the producer will be covered in each OMP addendum for each new deployment.

Periodic reviews of the site diary will be undertaken to ascertain whether particular WWTW sites can be associated with delivering materials with a problematic odour. In such instances, the causes will be investigated and actions taken to prevent further occurrences. As a last resort, this will include a refusal to accept material at the site from WWTW sites which deliver routinely problematic feedstock.

A subsequent visual and olfactory inspection is conducted immediately following tipping of the material by a suitably trained site operative. During this inspection the nature of the odour generated from the deposited material will be evaluated, and an assessment made as to whether the odours are excessively intense or offensive. If judged to be excessively odorous, the material will be rejected (reloaded or loaded into a separate vehicle or treated immediately). Clearly this is a subjective assessment which will rely on the experience of the operator, but is considered the most effective and practical measure. If required, rejected loads will be stored in a quarantined area and covered.

To ensure that the oldest feedstuff within the Feedstock Storage Area is processed first, a “first in first out” system of processing will be implemented. This will be managed via the following key approaches:

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1) Non – compliant sewage sludge will be delivered and sheeted at the end of each working day if it isn't to be limed within 72 hours.

2) Sewage sludge will be limed on a batch basis via the mobile liming plant (with a throughput of 25 tonnes per hour).

3) All sewage sludge will be delivered via sealed trailers/ skips. As a load is received, it will either be stored and covered or it will be processed.

#### *Miscellaneous*

Both the Feedstock Storage Area and sludge storage pad floors will be regularly cleaned to prevent the build-up of a potentially odorous layer of materials. This will take place when material is observed to be building up in corners or edges. At this point it will be scraped up with a shovel and limed.

The use of the odour suppression system will include scenarios such as (but not limited to);

- 1) prior to and during the unloading of vehicles,
- 3) 5 minutes before and after the loading and mixing of feedstock,
- 4) in periods of windy weather,
- 5) in periods of prolonged / unusually high or low pressure weather systems,
- 6) any other reason, as deemed necessary by the Site Manager/site staff.

The Feedstock Storage Area and treated sludge storage pad details are specific to each deployment. Details that will be addressed in each deployment are as follows, but not limited to:

- i. Dimensions
- ii. The maximum volume of untreated / treated sludge that will be stored at any one time
- iii. Construction details
- iv. How they are engineered to reduce odour emissions
- v. How the odour suppression system will be used in these areas?

As this is for a Mobile Plant, these details will be specified within the deployment application form. It is not possible to state this in the OMP as details will change from site to site, which will mean that the preferred approach would be that an addendum is provided for each site. The requirements of points i,ii,iii,iv,v above will be included in each addendum.

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It may also be that elements of the overarching OMP may need to be addressed.

#### 4.2.2 Treated sludge storage

Potentially, odours will also be generated as the treated sludge storage pad is either being filled or emptied. Due to the nature of the operation it is generally possible to plan the emptying of the storage pad. This will be planned, where possible, to coincide with favourable weather conditions. If it is not possible to plan sufficiently or if weather conditions change unfavourably then the odour suppression system will be used within the treated sludge storage pad area.

Treated biosolids will remain on site for at least 2 hours to ensure that each batch achieves the required pH12 for two hours. Sludges will remain on site for no longer than 72 hours. The treated biosolids will be loaded in to waiting trailers using a teleporter/loading shovel.

#### 4.3 Summary of odour management and control measures

Table 4 below presents a summary of the odour sources associated with the operations conducted and defines the measures adopted on site to control these risks.

Location of the source	Source of the odour	Control measures	Who
Feedstock Storage Area	Storage and liming	Inspection of loads following tipping and rejection of excessively odorous wastes Application of "just in time" principal for the majority of sludge deliveries. Prompt, skilful treatment of feedstock. Minimisation of feedstock holding times. Regular cleaning of floor. Use of odour suppression spray when required. Daily inspection of drainage channels.	Site manager
Sump	Runoff and dirty water	Keep volumes at a minimum. Ensure treatment is used correctly. Keep internal roadways clean to reduce the amount of contaminated water entering the sump.	
Storage pads		Sludge windrows to be covered when treatment is not being undertaken. Use odour suppression when loading/unloading where required.	

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## 5 Monitoring

### 5.1.1 General/odour monitoring

All site personnel will be responsible for immediately reporting any odour problems detected to the site manager on an on-going basis. In order to assess the effectiveness of the control measures presented above and whether operational procedures will be followed, the following will be conducted.

- A daily olfactory inspection of the site will be conducted during operational hours by the Site Manager or allocated operator. To ensure that assessors are not suffering from odour fatigue and will be sensitive to composting odours, on the day of the assessment they will not be subject to odours prior to conducting the assessment. During the inspection a walk-around of the entire site and perimeter will be conducted and observations made concerning the type and nature of any odours detected, including the likely source. The inspection will pay particular attention to any issues or areas of concern raised by NRW Officers.

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In addition, an inspection of all plant that are critical from an odour risk perspective (drains, lagoon, sumps etc) will be conducted to ensure that they are operational and functioning correctly.

The results will be recorded on a Daily Inspection Form (Annex A), and immediate investigation/remedial action undertaken where necessary. The forms will be inspected by a manager on a weekly basis to ensure actions have been implemented as required.

Any notable odours detected from other premises and activities in the vicinity of the site will also noted on this form.

- A weekly “sniff testing” exercise will be conducted, the protocol for which is outlined in Annex D. Personnel conducting the testing will be selected by the Site Manager and should comply with the criteria defined in the protocol. The results are recorded on the Sniff Testing Report Form (Annex D) and immediate investigation/remedial action undertaken where necessary (see Action plans/contingencies section). The forms are inspected by a manager on a weekly basis to ensure actions have been implemented as required.

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### 5.1.2 Reception operations

- The daily inspection of the site includes a check to see whether the feedstock reception area is clean, any windrows requiring covering are covered, and that the integrity of the impermeable surface hasn't been compromised. The results will be recorded in the Daily Inspection Form and any repairs instigated immediately.
- All incoming feedstock will be visually and olfactory assessed when first deposited by the Site Manager, or a suitably trained site operative to inform the feedstock treatment process.

### 5.1.3 Cleaning

All areas will be cleaned with shovels and a pressure washer used when the site is either closed or is not forecast to operate for an extended period.

## 6 Abnormal events

A range of possible abnormal events considered to have the potential to result in increased risk of offsite odour impact have been considered. The events and response measures to be implemented are presented below:

Event	Location	Likely effect on emissions inventory	Response measures
Severely odorous feedstock received	Feedstock Storage Area	Increase in emissions from reception area while severely odorous materials are present	If highly wet sludges are received, care will be taken to ensure suitable prompt lime treatment as a priority.
Mechanical or other problem at site preventing treatment of sewage sludge.	Feedstock Storage Area	Increase in emissions if more materials become backlogged and degradation occurs	Instigate immediate investigation and remedial action as required.  If there is a risk of backlogged materials becoming excessively odorous the site will be kept closed until feedstock can be processed or removed.  If necessary the site will remain closed to further

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			deliveries until the backlog cleared.
Elevated odours from sump	Sump	Increased emissions from sump	Remove liquid from site via tanker for treatment and disposal via contractor, investigate containment integrity.
Restricted staff availability	All operational locations	Risk of increased impact from any area of site where normal operations affected	Several staff will be trained to operate the loading shovels and treatment plant. If required hire staff could be employed as necessary.
Extreme meteorological conditions	All operational locations	Risk of increased impact from any area of site where normal operations affected	When extreme meteorological conditions occur inhibiting the adequate dispersion of odours or increasing risk of unacceptable exposure at receptors, potential odour generating activities such as vehicle unloading, treatment plant loading and unloading etc. will not continue as normal.

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Following the occurrence of any abnormal events, a post-event review will be conducted and if necessary modifications to the control measures, mitigation equipment, training and contingency actions will be implemented and the OMP updated accordingly.

Where an event is found to be due to deviation from operational procedures, in-place staff will be re-trained in use of procedures as necessary.

## 7 Odour action plans/contingencies

### 7.1 Odour complaint investigation

The following actions will be taken on receipt of an external odour complaint:

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- Any complaints received at the site will be logged on an odour complaint report form (Annex E). The regulator will be informed immediately that a complaint has been received.
- The site manager will be given the details of the odour complaint as soon as possible including the location, nature, time and date of the complaint.
- If complaints are recent/current, a sniff test will be conducted by personnel in the area from which the complaint is received in order to assess the presence/absence of any odours, and the odour characteristics and intensity.
- For all complaints, reference will be made to the site activities at the time of the complaint and the Daily Inspection Form and further onsite investigations conducted to determine whether any abnormal operations are/were occurring (failure in odour critical plant, notable odours identified etc.). The following key potential causes of abnormal odour emissions will be investigated:
  - Has feedstock arriving at the site been correctly assessed at the weighbridge, and by the site manager once tipped? Are there any unusual characteristics evident in the waste on-site (composition, age, condition, etc)?
  - Are/were reception and treatment processes occurring as per normal?
  - Is/was the odour suppression system working?
  - What are/were the weather conditions (e.g. low or high pressure)?
  - Are/were treatment or loading activities causing odour release?
  - Are/were there any unusual activities taking place off-site e.g. agricultural operations?
- Once the cause has been established, appropriate actions (see below) will be immediately implemented and actions devised to prevent a recurrence of the incident.
- Feedback will be given to complainants on the findings of these investigations if they are known, and a summary will be provided of any remedial measures taken to rectify odour problems and ensure that the problem has been suitably resolved. The complainant will be asked if the perceived problem is still occurring to measure any improvement achieved. In the event that a significant odour event has occurred, an apology will be issued as appropriate and a commitment given to try and prevent further occurrences.
- Richard Rogers t/a Rogers Transport will submit a short factual response to the regulator detailing the complaint(s) received, the investigations conducted, the findings of those investigations, whether the complaint was substantiated, any remedial

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measures implemented and any on-going improvement actions to be implemented with a target period of seven days from receipt of the complaint.

- Complaint trend analysis will be conducted to identify any trends and patterns in complaints to assist in identification of possible causes and solutions.
- Records of all complaints, subsequent investigations, and remedial actions will be kept for at least five years. The site manager shall ensure they are readily retrievable, and maintained as fit for retention. As applicable, records will be stored in accordance with the Data Protection Act 1998.

## 7.2 Action plans

In the event that an odour complaint is proven to be justified and attributable to site odours, or a 'non-conformance' occurs, a defined action plan (below) will be implemented. The following odour 'non-conformances' have been identified for the site:

- Abnormal odour emissions occur;
- Significant odour is detected onsite that is believed to pose a risk of offsite odour impact;
- Significant site odour is detected off-site during the weekly "sniff testing" exercise (e.g. odour intensity 3 or above detected near residential receptors).

In the event that any of the above occurs, the following actions shall be taken:

- If not previously undertaken, a walk-around of the entire site and a review of the Daily Inspection Form will be conducted in order to identify the likely cause(s) of the odour.
- Upon identification of the likely odour source(s), appropriate corrective and preventative measures shall be identified and implemented, depending on the outcome of the investigations. The measures will consider, but not be limited to:
  - Review of the effectiveness of feedstocks handling and liming procedure;
  - If excessive odours within stored feedstock occur all stockpile windrows will be covered or removed from site if necessary.
  - If odours are generated from the accumulation of leachate in the Feedstock Storage Area ensure runoff collection and containment systems are operating effectively. Clean/remediate as necessary.
  - Details of any odour 'non-conformances' including the nature of the incident, results of investigations, action taken and any required amendments to the OMP will be made available to the regulator upon request.

## 8 Liaison and document review

### 8.1 Liaison

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Document reference:		Document issue no:	1
Document issue date:			

Richard Rogers t/a Rogers Transport will ensure that established clearly defined and accessible communication channels are set up for residents to report odour issues. These will include:

- Contact details (including telephone number and address), displayed on the main site notice board (positioned at the entrance to each site).
- Contact details will include an emergency “out of hours” contact number for use when the site is un-manned.

Where routine complaints are received, local residents will be asked to complete odour diaries (Annex F), the results of which will be reviewed to identify trends such as key odour exposure times and locations. Any trends identified will be used to focus the daily site inspections and weekly sniffing exercises, and the site operations/meteorological conditions at these times reviewed. Richard Rogers t/a Rogers Transport is committed to ensuring any issues identified by the community are promptly acted upon to ensure the on-going co-operation between the two parties.

## **8.2 Review requirement and timescale**

This Odour Management Plan will be formally reviewed by Richard Rogers t/a Rogers Transport, initially six months after commencement of operation, and from then on an annual basis as a minimum to ensure that the controls described are effective and reflect best available techniques. In addition, the OMP will be reviewed following any relevant changes in site operations or procedures that are likely to have implications from an odour generation/impact perspective.

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## Annex A – Site Monitoring Form



The following form will be used in the event of the site receiving an odour complaint to establish the potential cause of odours.

Location	Operation	Compliant?	Action required
Non-compliant storage area			
Treated storage area			
Liming area			
Sump			
Roadways			
<b>Olfactory survey results</b>			
<b>Location of odours detected</b>	<b>Type of odours detected</b>	<b>Nature/duration</b>	<b>Possible source/Action required</b>
<b>Date</b>		<b>Assessor</b>	

The following methodology will be used to follow up complaints.

Where the test is carried out will depend on:

- Location of complaint;
- When trying to establish the source of an odour;
- Wind direction.

The assessment will involve walking along a route that has been selected either because of these factors, or in response to the conditions found upon arrival.

A note will be made of any external activities (such as agricultural practices) that could be either be the source of the odour, contribute to the odour, or be a confounding factor. Odour will become diluted and it may change character as this happens.

Please note:

- Staff normally exposed to the odours may not be able to detect or reasonably judge the intensity of odours off-site. It might be better to use office staff or people who have not recently been working on the site to do this.
- Anyone who has a cold, sinusitis or a sore throat, is likely to underestimate the odours.
- To improve (or to check) data quality, get two people to do the test independently at the same time.
- Those doing the assessment should avoid strong food or drinks, including coffee, for at least half an hour beforehand. They should also avoid strongly scented toiletries and deodorisers in the vehicle used during the assessment.

## Annex B - SNIFF TESTING PROTOCOL



Odour report form					Date
Time of test					
Location of test e.g. street name etc					
Weather conditions (dry, rain, fog, snow etc):					
Temperature (very warm, warm, mild, cold, or degrees if known)					
Wind strength (none, light, steady, strong, gusting) Use Beaufort scale if known					
Wind direction (e.g. from NE)					
Intensity (see below)					
Duration (of test)					
Constant or intermittent in this period or persistence					
What does it smell like?					
Receptor sensitivity (see below)					
Is the source evident?					
Any other comments or observations					

**Sketch a plan of where the tests were taken, the potential source(s).**

<b>Intensity</b> 0 No odour 1 Very faint odour 2 Faint odour 3 Distinct odour 4 Strong odour 5 Very strong odour 6 Extremely strong odour Ref: German Standard VDI 3882, Part 14	<b>Receptor sensitivity where odour detected</b> Low (e.g footpath, road) Medium (e.g. industrial or commercial workplaces) High (e.g. housing, pub/hotel etc)
--	---

# ODOUR COMPLAINT REPORT FORM



Time and date of complaint:	Name and address of complainant:	
Telephone number of complainant:		
Date of odour:		
Time of odour:		
Location of odour, if not at above address:		
Weather conditions (i.e., dry, rain, fog, snow):		
Temperature (very warm, warm, mild, cold or degrees if known):		
Wind strength (none, light, steady, strong, gusting):		
Wind direction (eg from NE):		
Complainant's description of odour:		
○ What does it smell like?		
○ Intensity (see below):		
○ Duration (time):		
○ Constant or intermittent in this period:		
○ Does the complainant have any other comments about the odour?		
Are there any other complaints relating to the installation, or to that location? (either previously or relating to the same exposure):		
Any other relevant information:		
Do you accept that odour likely to be from your activities?		
What was happening on site at the time the odour occurred?		
Operating conditions at time the odour occurred (eg flow rate, pressure at inlet and pressure at outlet):		
Actions taken:		
Form completed by:	Date	Signed

**Intensity**

- |                    |                  |                          |
|--------------------|------------------|--------------------------|
| 0 No odour         | 3 Distinct odour | 5 Very strong odour      |
| 1 Very faint odour | 4 Strong odour   | 6 Extremely strong odour |
| 2 Faint odour      |                  |                          |

<b>ODOUR DIARY</b>		Sheet No
Name:	Address:	
Telephone Number:		

Date of odour						
Time of odour						
Location of odour, if not at above address (including whether indoor or outside)						
Weather conditions (dry, rain, fog, snow etc )						
Temperature (hot, very warm, warm, mild, cold or degrees if known)						
Wind strength (calm, light, steady, strong, gusting)						
Wind direction (e.g. from NE)						
What does it smell like? How unpleasant is it? Do you consider this smell offensive?						
Intensity – How strong was it? (see below 0-6)						
How long did the smell last?						
Was it constant or intermittent?						
What do you believe the source or cause to be?						
Any actions taken or any other comments						

**Intensity**

0 No odour

3 Distinct odour

5 Very strong odour

1 Very faint odour

4 Strong odour

6 Extremely strong odour

2 Faint odour



## WASTE ACCEPTANCE PROCEDURE



1. Only vehicles expected at the site (contractual) will deposit loads at the site.
2. If the material is not as described, the load will remain until the producer removes any non-permitted waste types.
3. If this is not possible the load will be taken to another permitted facility and the producer will be recharged accordingly.
4. Prior to leaving the site of the waste producer the load will be netted or sheeted where applicable.
5. On arrival at the site the operator on site will check carrier documentation and inspect the load and, if acceptable, will direct the load to the tipping area.
6. If the waste is non-permitted the vehicle will be directed to a holding area.
7. No waste other than that listed on the deployment form, will be permitted for tipping or processing
8. All loads will be supervised on tipping where necessary.
9. Any non-conforming waste discovered as part of the waste inspection on discharge, or elsewhere as part of the waste movement or spreading operation, will be placed in a container and segregated from other wastes.
10. Non permitted waste materials waste will be removed from site as soon as possible. The waste carrier/client will be informed of the non-conformance. Records of such incidents will be kept in the site diary.
11. Waste checks carried out by the operator will be recorded on the ticket as a description of the load. Any loads rejected at this point would be entered in the site diary and prevented from tipping on site.
12. Non-conforming waste leaving the site will be transported from site for treatment at a permitted facility.

WASTE REJECTION REPORT FORM



Date	Time in/out	Producer	EWC	Reason	Destination

# ENVIRONMENTAL PERMIT (BESPOKE MPP) APPLICATION

## Appendix 8

OPRA spreadsheet

Prepared for: Richard Rogers



Version 2

April 2019



## Opra Spreadsheet for Waste Facilities

Version: **NRW v1** Release Date: **01-Apr-15**

Permit No:

Site Name:

Date:

Operator:

Attribute	Bands	Points
<u>Complexity(s):</u>	B	10
<u>Emissions:</u>	B	7
<u>Location:</u>	A	1
<u>Operator Performance:</u>	B	4
	<b>Total:</b>	<b>22</b>

Fees and Charges	
Application Fee	£3,762
Normal Variation	£3,058
Full Surrender	£2,750
Part Surrender	£2,750
Subsistence	See Charge Tables

Compliance Rating

*Subsistence Multiplier*

**100%**

[Reference Sheet](#)

**Complexity Attribute**

Site Type: A24 ▼

Complexity Band: B

2nd Site Type: ... ▼

2nd Band:

Complexity Bands are based on a lookup table (see References tab)

More than one Complexity (Site Type) is required only in circumstances where the permit in question covers a landfill activity **and** a treating/keeping activity. In all other circumstances only one site type should be entered. Where more than one site type applies, the one carrying the highest relevant complexity band is used.

**Emissions Attribute (Waste Input)**

Waste Type	Annual Tonnage	Emission Threshold	Emission Index
Inert		1000	
Non Hazardous (Non Bio)		750	
Non Hazardous (Bio)		500	
Hazardous		250	

Total:

Band:

B

Emission Bands are based on total index: &lt;10=A, &lt;100=B, &lt;1000=C, &lt;10000=D, &gt;=10000=E

**Location Attribute**QuestionAnswerPoints

Proximity to Human Occupation:

50m-250m ▼

3

Assessment under wildlife, countryside or habitats legislation:

No ▼

Groundwater/Aquifers:

No ▼

Sensitivity of surface water:

None ▼

QuestionAnswerPoints

Direct run-offs:

No ▼

Air Quality Management Zone:

No ▼

Flood Plain:

No ▼

Total Points: 3

Band:

A

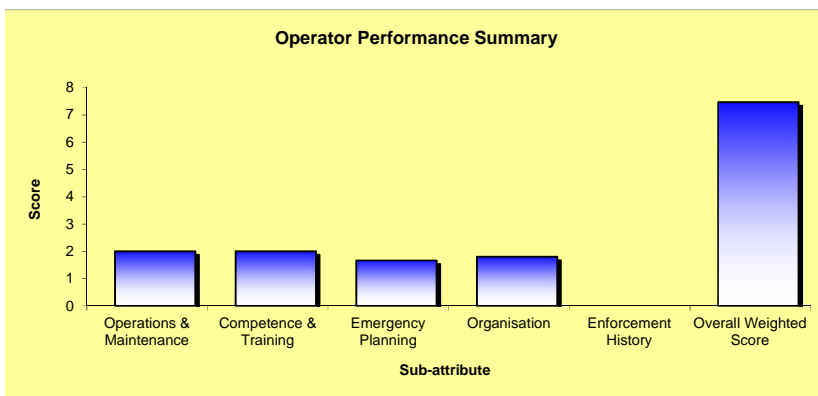
Location Bands are based on total points: 0-4=A, 5-8=B, 9-12=C, 13-18=D, &gt;18=E

Operations & Maintenance			
1	Do you have documented operating procedures for operations that may have an adverse impact on the environment?	Yes	4
2	Is there a defined procedure for identifying, reviewing and prioritising items of plant for which a preventative maintenance regime is appropriate?	Yes	2
			0
4	Do you have a preventative maintenance programme for items of plant whose failure could lead to impact on the environment?	Yes	2
5	Does the preventative maintenance programme include regular checks and formal inspections of infrastructure items such as tanks, pipework, retaining walls, bunds and ducts?	Yes	2
6	Are the reports, results and recommendations arising from your own audits made available to senior management on a regular basis?	Yes	2
<b>Operations and Maintenance Total</b>			<b>12</b>
			<b>2.0</b>

Competence and Training - 20%			
1	Has a training needs assessment been carried out which: <input type="checkbox"/> Identifies all posts for which specific environmental awareness training is required; and <input type="checkbox"/> Identifies the scope and level to which such training is to be given?	Yes	3
2	Are training systems in place for all relevant staff that cover the following factors: <input type="checkbox"/> the regulatory requirements associated with the Permit as they affect their roles and responsibilities; <input type="checkbox"/> likely potential environmental impacts which may be caused by plant under their control. This should cover both normal and abnormal circumstances; <input type="checkbox"/> reporting procedures to inform supervisors or managers of deviations from permit conditions; <input type="checkbox"/> procedures to be used by supervisors or managers for the reporting of deviations from permit conditions to the regulator <input type="checkbox"/> prevention of accidental emissions and action to be taken when accidental emissions occur?	Yes	2
		Yes	2
		Yes	3
		Yes	2
		Yes	2
3	Do you assess the potential environmental risks posed by the work of contractors and provide instructions to contractors about protecting the environment while working on site?	Yes	3
4	If there are industry standards for training in this sector (e.g. WAMITAB) do you apply them? (If no industry standards please leave blank)	Yes	0
<b>Competence Training Total</b>			<b>17</b>
			<b>2.0</b>

Emergency planning - 20%			
1	Is there an accident plan that complies with guidance covering the following aspects of foreseeable scenarios: likelihood, consequences, actions to prevent, action to take in the event it occurs?	Yes	6
2	Has the plan identified areas where improvement is needed?	No	0
3	Where improvement has been identified, does the plan include an implementation programme with acceptable timescales to the regulator? If not, points will be deducted.		0
4	Do you have written procedures for handling, investigating, communicating and reporting actual or potential non compliance with operating procedures or emission limits?	Yes	4
			0
			0
			0
<b>Emergency planning Total</b>			<b>10</b>
			<b>1.7</b>

Organisation - 40%			
<b>Internal/External Environment Management Systems:</b> <b>Answer either Question 1 or Question 2</b> <b>NB: If your externally audited system is ISO9001 but you also have an internal environmental management system, you may be able to obtain a better score by providing answers to question 2</b>			
1	Do you have a certified Environmental Management System, subject to external audit, which covers the activities allowed by this permit? If so which one?	No	0
Sub Total			0
<b>2 If you do not operate an externally audited environmental management system but have an internal one, assess your system against the criteria below:</b>			
2.1	Has your company adopted an environmental policy and programme which :		
	<input type="checkbox"/> includes a commitment to continual improvement and prevention of pollution?	Yes	3
	<input type="checkbox"/> includes a commitment to comply with relevant legislation, and with other requirements that the organisation subscribes to?	Yes	3
	<input type="checkbox"/> identifies, sets, monitors and reviews environmental objectives, independently of the permit?	Yes	3
2.2	Do you have an environmental policy and programme which is subject to audit by your company?	No	0
2.3	Are there annual reports on environmental performance, objectives and targets, future planned improvements and/or do you participate in local community liaison meetings?	No	0
3	Does your company produce a public environmental statement? You may score in this box for ISO 14001 and industry systems but not for EMAS as this is a requirement for EMAS.	No	0
4	Within the past 5 years have you failed to meet an improvement condition set by the regulator in a Permit or Variation by the due date, without prior agreement? (minus 2 for each failure). ADD NUMBER OF FAILURES NOT Y OR N	0	0
Organisational Total:			9.0
			1.8
<b>Enforcement History (0 to -40% weighting)</b>  <b>Please enter the number of times relevant enforcement actions have been pursued in connection with your site. Note: the timescales over which action remains relevant depends on the type of enforcement action and is contained in the questions below</b>			
1	Number of Enforcement, Improvement, Works, Compliance or Restoration Notices issued in the past year by the Environment Agency under any legislation, by the Health and Safety Executive relevant to the COMAH Regulations or by local authorities under Part I of the Environmental Protection Act 1990 or relevant notice or Abatement Notices issued by local authorities or magistrates courts under Part III of the Environmental Protection Act 1990 (in all cases, other than any overturned on appeal by the Operator)	0	
2	Number of Formal Cautions, Enforcement Undertakings or Fixed Monetary Penalties issued by the Environment Agency in respect of offences under relevant legislation in the last 3 years.	0	
3	Number of Prohibition, Stop, Suspension or Revocation Notices issued by the Environment Agency under any legislation, by the HSE relevant to the COMAH Regulations or by local authorities under Part I of the Environmental Protection Act 1990, (other than any overturned on appeal by the Operator) in the last 3 years	0	
4	Number of Convictions on prosecutions brought by the regulator under any legislation, by the HSE relevant to the COMAH regulations or by local authorities (in respect of offences under Parts I or III of the Environmental Protection Act 1990) in last 5 years (or 10 years where a term of imprisonment was imposed on the Operator) (other than any overturned on appeal). Or number of any Variable Monetary Penalties issued.	0	
			0
Overall Operator Performance Score:			7.47
Band E= less than 2 D= 2 to 3.99, C= 4 to 5.99, B= 6 to 7.99 , A= 8 to 11			BAND= B



Operator Performance Summary
Operations & Maintenance
Competence & Training
Emergency Planning
Organisation
Enforcement History
Overall Weighted Score







2.0
2.0
1.7
1.8
0.0
7.5

Complexity Bands	
...	
A01	EEE
A01-Closed	B
A02	EE
A02-Closed	B
A03	E
A03-Closed	B
A04	DD
A04-Closed	B
A04-Dredgings	B
A05	C
A05-Closed	A
A06	C
A06-Closed	A
A07	C
A07-Closed	A
A08	C
A08-Closed	A
A09	D
A10	B
A11	C
A12	D
A13 (non-haz)	B
A13 (haz)	C
A14	B
A15	A
A16 (non-haz)	A
A16a (haz)	D
A17	E
A18	D
A19	C
A19a	B
A20	C
A21	E
A22	C
A23	C
A24	B
A25	B
A26	n/a
A27	A
A29	B
L05	C
L05-Closed	A

2015/16

Charge Multipliers					
App	£171	Nor Var	£139	Full Surr	£125
Subs	NA				

Converting Bands to Opra Score

Band	A	B	C	D
Complexity	4	10	35	50
Emissions	3	7	15	30
Location	1	2	3	5
Op Perf	2	4	7	10
Compliance Rating	0.95	1	1.1	1.25
Band	A	B	C	D

EMS	Points
No	0
EMAS	20
ISO14001	15
Other Accredited	12
ISO 9001	8

£125

E	DD	EE	EEE
65	100	130	195
40			
7			
14			
1.5	3		
E	F		

# ENVIRONMENTAL PERMIT (BESPOKE MPP) APPLICATION

## Appendix 9

Technical competency

Prepared for: Richard Rogers



Version 1

April 2019





**Qualification Title:**

**WAMITAB Level 4 Medium Risk Operator Competence for Non-hazardous Sludge and Land Spreading**

**Qualification Accreditation Number:**

601/8526/0

**This Certificate is awarded to**

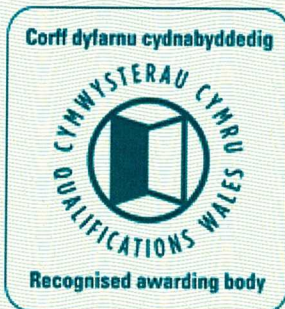
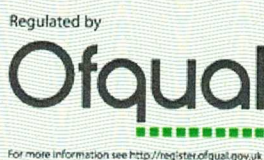
**Richard Rogers**

**Awarded:** 13/08/2018

**Serial No:**23322/MROC10a/1

**Authorised**

**Chris James**  
Chief Executive Officer, WAMITAB



The qualifications regulators logos on this certificate indicate that the qualification is accredited only for England, Wales and Northern Ireland. Qualifications Wales regulates this qualification where it is awarded to learners assessed wholly or mainly in Wales.



00124409





**Credit certificate**  
**This certificate determines credit awarded to:**

**Richard Rogers**

**Units gained:**

A/508/0756	Maintain health and safety in the waste resource management industry
F/508/0757	Manage the environmental impact of work activities
F/508/0760	Manage the movement, sorting and storage of waste
R/508/0861	Control work activities on a waste management facility
J/508/0887	Manage the reception of non-hazardous waste
K/508/0980	Manage transfer and disposal from non-hazardous waste treatment and recovery operations

Credit Value    Credit Level

4	4
3	4
5	4
6	4
6	3
8	4

**Awarded:** 13/08/2018

**Serial No.:** 23322/OCS01/1

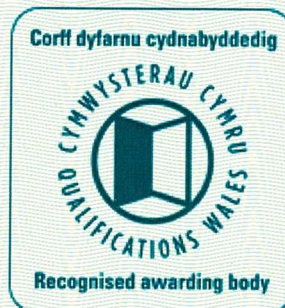
**Authorised**

**Chris James**  
**Chief Executive Officer, WAMITAB**

Regulated by

**Ofqual**

For more information see <http://reg-ister.ofqual.gov.uk>



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00124410





**Qualification Title:**

**WAMITAB Level 4 Certificate in Waste and Resource Management -  
4WRMd**

**Qualification Accreditation Number:**

601/2388/6

**This Certificate is awarded to**

**Simon Peter Williams**

**Awarded:** 15/05/2018

**Serial No:**16241/4WRMd/1

**Authorised**

**Chris James**  
Chief Executive Officer, WAMITAB



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00120768





## Credit certificate

**This certificate determines credit awarded to:**

**Simon Peter Williams**

### Units gained:

Credit Value    Credit Level

M5059077	Environmental Protection in Waste and Resource Management	3	4
T5059078	Communication, interaction and influence of stakeholders and other non-legislative factors within Waste and Resources management	3	4
A5059079	Legislation to support the operation of a Waste and Resources Management Facility	4	4
M5059080	Health and safety principles and practices in the Waste and Resource Management Sector	3	4
T5059081	Principles of Sustainable Waste and Resource Management	3	4
F5059083	Principles and Practices of Managing Land Remediation Activities	3	4

**Awarded:** 15/05/2018

**Serial No.:** 16241/WRM1/1

**Authorised**

**Chris James**  
Chief Executive Officer, WAMITAB

Regulated by

**Ofqual**

For more information see <http://reg.gov.uk>



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**00120760**



Certificate No. OCC8652

## Operator Competence Certificate

**Title:**

**Waste and Resource Management - Land Remediation - 4WRMd**

**This Certificate is awarded to**

**Simon Peter Williams**

**Awarded: 15/05/2018**

**Authorised**

**WAMITAB Chief Executive Officer**

**CIWM Chief Executive Officer**



**The Chartered Institution  
of Wastes Management**

This certificate is jointly awarded by WAMITAB and the Chartered Institution of Wastes Management (CIWM) and provides evidence to meet the Operator Competence requirements of the Environmental Permitting (EP) Regulations, which came into force on 6 April 2008.



00120749





**Qualification Title:**

**WAMITAB Level 4 Certificate in Waste and Resource Management -  
4WRMa**

**Qualification Accreditation Number:**

601/2388/6

**This Certificate is awarded to**

**Simon Peter Williams**

**Awarded:** 15/05/2018

**Serial No:**16241/4WRMa/1

**Authorised**

**Chris James**  
Chief Executive Officer, WAMITAB



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00120769



## Credit certificate

**This certificate determines credit awarded to:**

**Simon Peter Williams**

### Units gained:

Credit Value    Credit Level

Y5059087	Principles and Practices of Managing a Physical Treatment Processing Facility for Waste and Resources	3	4
M5059077	Environmental Protection in Waste and Resource Management		
T5059078	Communication, interaction and influence of stakeholders and other non-legislative factors within Waste and Resources management		
A5059079	Legislation to support the operation of a Waste and Resources Management Facility		
M5059080	Health and safety principles and practices in the Waste and Resource Management Sector		
T5059081	Principles of Sustainable Waste and Resource Management		

**Awarded:** 15/05/2018

**Serial No.:** 16241/WRM6a./1

### Authorised

**Chris James**  
Chief Executive Officer, WAMITAB

Regulated by

**Ofqual**

For more information see <http://registrar.ofqual.gov.uk>



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00120761





Certificate No. OCC8653

## Operator Competence Certificate

**Title:**

**Waste and Resource Management - Physical Treatment - 4WRMa**

**This Certificate is awarded to**

**Simon Peter Williams**

**Awarded: 15/05/2018**

**Authorised**

**WAMITAB Chief Executive Officer**

**CIWM Chief Executive Officer**



**The Chartered Institution  
of Wastes Management**

This certificate is jointly awarded by WAMITAB and the Chartered Institution of Wastes Management (CIWM) and provides evidence to meet the Operator Competence requirements of the Environmental Permitting (EP) Regulations, which came into force on 6 April 2008.



00120750