

# Permit with introductory note

The Environmental Permitting (England & Wales) Regulations 2010

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Heathrow Airport Limited

Heathrow Airport Camp 4  
Great Southwest Road  
Hounslow  
Middlesex  
TW14 0PH

Permit number

EPR/HB3531RV

# Heathrow Airport Camp 4

## Permit number EPR/HB3531RV

### Introductory note

#### **This introductory note does not form a part of the permit**

The main features of the permit are as follows:

The Environmental Permit allows Heathrow Airport Limited (the operator) to operate an open windrows composting facility which was previously carried out under a Paragraph 12 exemption. Heathrow Airport has a large grassland area where all the waste materials are derived. Feedstock materials is brought to the site and deposited for subsequent use in the composting process. Once windrow composting has completed (8-12 weeks), it is then moved off the composting pad and on to the maturation area. Finished compost is collected and transported to the airfield where it is used in airfield borders, grass islands and other vegetated areas as and when it is needed.

The Environment Agency's position statement on "Composting and potential health effects from bioaerosols is relevant to the permitted operation as the site is within 250 metres of a sensitive receptor and the maximum amount of waste handled at any one time exceeds 500 tonnes.

The status log of the permit sets out the permitting history, including any changes to the permit reference number.

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Status log of the permit		
Description	Date	Comments
Application Received EPR/HB3531RV/A001	Duly made 30/04/12	Application for a composting facility.
Application EPR/HB3531RV/A001	Duly made 19/06/12	Application for an open composting facility.
Additional information received	11/06/12	Revised application forms (Parts B2 & B4)
	13/06/12	Windspeed data (Version 2)
	31/07/12	Local Operating Procedure (V2)
	10/08/12	Site specific Bioaerosol Risk Assessment
	28/08/12	Odour management Plan
Permit determined	10/09/12	Permit issued to Heathrow Airport Limited

End of introductory note

# Permit

The Environmental Permitting (England and Wales) Regulations 2010

**Permit number**  
**EPR/HB3531RV**

The Environment Agency hereby authorises, under regulation 13 of the Environmental Permitting (England and Wales) Regulations 2010

**Heathrow Airport Limited** (“the operator”),  
whose principal office is

**The Compass Centre**  
**Nelson Road**  
**Hounslow**  
**Middlesex**  
**TW6 2GW**

company registration number 01991017  
to operate waste operations at

**Heathrow Airport Camp 4**  
**Great Southwest Road**  
**Hounslow**  
**Middlesex**  
**TW14 0PH**

to the extent authorised by and subject to the conditions of this permit.

Name	Date
<b>Ian Brindley</b>	<b>13/09/2012</b>

Authorised on behalf of the Environment Agency

# Conditions

## 1 Management

### 1.1 General management

- 1.1.1 The operator shall manage and operate the activities:
- (a) in accordance with a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances, closures and those drawn to the attention of the operator as a result of complaints; and
  - (b) using sufficient competent persons and resources.
- 1.1.2 Records demonstrating compliance with condition 1.1.1 shall be maintained.
- 1.1.3 Any person having duties that are or may be affected by the matters set out in this permit shall have convenient access to a copy of it kept at or near the place where those duties are carried out.
- 1.1.4 The operator shall comply with the requirements of an approved competence scheme.

### 1.2 Avoidance, recovery and disposal of wastes produced by the activities

- 1.2.1 The operator shall take appropriate measures to ensure that:
- (a) the waste hierarchy referred to in Article 4 of the Waste Framework Directive is applied to the generation of waste by the activities; and
  - (b) any waste generated by the activities is treated in accordance with the waste hierarchy referred to in Article 4 of the Waste Framework Directive; and
  - (c) where disposal is necessary, this is undertaken in a manner which minimises its impact on the environment.
- 1.2.2 The operator shall review and record at least every four years whether changes to those measures should be made and take any further appropriate measures identified by a review.

## 2 Operations

### 2.1 Permitted activities

- 2.1.1 The operator is only authorised to carry out the activities specified in schedule 1 table S1.1 (the “activities”).

## **2.2 The site**

- 2.2.1 The activities shall not extend beyond the site, being the land shown edged in green on the site plan at schedule 7 to this permit.

## **2.3 Operating techniques**

- 2.3.1 (a) The activities shall, subject to the conditions of this permit, be operated using the techniques and in the manner described in the documentation specified in schedule 1, table S1.2, unless otherwise agreed in writing by the Environment Agency.
- (b) If notified by the Environment Agency that the activities are giving rise to pollution, the operator shall submit to the Environment Agency for approval within the period specified, a revision of any plan specified in schedule 1, table S1.2 or otherwise required under this permit, and shall implement the approved revised plan in place of the original from the date of approval, unless otherwise agreed in writing by the Environment Agency.
- 2.3.2 Waste shall only be accepted if:
- (a) it is of a type and quantity listed in schedule 2 table S2.1; and
- (b) it conforms to the description in the documentation supplied by the producer and holder.

# **3 Emissions and monitoring**

## **3.1 Emissions of substances not controlled by emission limits**

- 3.1.1 Emissions of substances not controlled by emission limits (excluding odour) shall not cause pollution. The operator shall not be taken to have breached this condition if appropriate measures, including, but not limited to, those specified in any approved emissions management plan, have been taken to prevent or where that is not practicable, to minimise, those emissions.
- 3.1.2 The operator shall:
- (a) if notified by the Environment Agency that the activities are giving rise to pollution, submit to the Environment Agency for approval within the period specified, an emissions management plan;
- (b) implement the approved emissions management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.
- 3.1.3 All liquids in containers, whose emission to water or land could cause pollution, shall be provided with secondary containment, unless the operator has used other appropriate measures to prevent or where that is not practicable, to minimise, leakage and spillage from the primary container.

## **3.2 Odour**

- 3.2.1 Emissions from the activities shall be free from odour at levels likely to cause pollution outside the site, as perceived by an authorised officer of the Environment Agency, unless the operator has used appropriate measures, including, but not limited to, those specified in any approved odour management plan, to prevent or where that is not practicable to minimise the odour.

## **3.3 Noise and vibration**

- 3.3.1 Emissions from the activities shall be free from noise and vibration at levels likely to cause pollution outside the site, as perceived by an authorised officer of the Environment Agency, unless the operator has used appropriate measures, including, but not limited to, those specified in any approved noise and vibration management plan to prevent or where that is not practicable to minimise the noise and vibration.
- 3.3.2 The operator shall:
- (a) if notified by the Environment Agency that the activities are giving rise to pollution outside the site due to noise and vibration, submit to the Environment Agency for approval within the period specified, a noise and vibration management plan;
  - (b) implement the approved noise and vibration management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.

## **3.4 Monitoring**

- 3.4.1 The operator shall, unless otherwise agreed in writing by the Environment Agency, undertake the monitoring specified in the following tables in schedule 3 to this permit:
- (a) process monitoring specified in table S3.1;
- 3.4.2 The operator shall maintain records of all monitoring required by this permit including records of the taking and analysis of samples, instrument measurements (periodic and continual), calibrations, examinations, tests and surveys and any assessment or evaluation made on the basis of such data.
- 3.4.3 Monitoring equipment, techniques, personnel and organisations employed for the emissions monitoring programme and the environmental or other monitoring specified in condition 3.3.1 shall have either MCERTS certification or MCERTS accreditation (as appropriate), where available, unless otherwise agreed in writing by the Environment Agency.
- 3.4.4 Permanent means of access shall be provided to enable sampling/monitoring to be carried out in relation to the emission points specified in schedule 3 tables S3.1 and S3.2 unless otherwise agreed in writing by the Environment Agency.

# **4 Information**

## **4.1 Records**

- 4.1.1 All records required to be made by this permit shall:
- (a) be legible;

- (b) be made as soon as reasonably practicable;
  - (c) if amended, be amended in such a way that the original and any subsequent amendments remain legible, or are capable of retrieval; and
  - (d) be retained, unless otherwise agreed in writing by the Environment Agency, for at least 6 years from the date when the records were made, or in the case of the following records until permit surrender:
    - (i) off-site environmental effects; and
    - (ii) matters which affect the condition of the land and groundwater.
- 4.1.2 The operator shall keep on site all records, plans and the management system required to be maintained by this permit, unless otherwise agreed in writing by the Environment Agency.

## **4.2 Reporting**

- 4.2.1 The operator shall send all reports and notifications required by the permit to the Environment Agency using the contact details supplied in writing by the Environment Agency.
- 4.2.2 Within one month of the end of each quarter, the operator shall submit to the Environment Agency using the form made available for the purpose, the information specified on the form relating to the site and the waste accepted and removed from it during the previous quarter.

## **4.3 Notifications**

- 4.3.1 The Environment Agency shall be notified without delay following the detection of:
- (a) any malfunction, breakdown or failure of equipment or techniques, accident, or emission of a substance not controlled by an emission limit which has caused, is causing or may cause significant pollution;
  - (b) the breach of a limit specified in the permit; or
  - (c) any significant adverse environmental effects.
- 4.3.2 Any information provided under condition 4.3.1 shall be confirmed by sending the information listed in schedule 5 to this permit within the time period specified in that schedule.
- 4.3.3 Where the Environment Agency has requested in writing that it shall be notified when the operator is to undertake monitoring and/or spot sampling, the operator shall inform the Environment Agency when the relevant monitoring and/or spot sampling is to take place. The operator shall provide this information to the Environment Agency at least 14 days before the date the monitoring is to be undertaken.
- 4.3.4 The Environment Agency shall be notified within 14 days of the occurrence of the following matters, except where such disclosure is prohibited by Stock Exchange rules:
- Where the operator is a registered company:
- (a) any change in the operator's trading name, registered name or registered office address; and

- (b) any steps taken with a view to the operator going into administration, entering into a company voluntary arrangement or being wound up.

Where the operator is a corporate body other than a registered company:

- (a) any change in the operator's name or address; and
- (b) any steps taken with a view to the dissolution of the operator.

4.3.5 Where the operator proposes to make a change in the nature or functioning, or an extension of the activities, which may have consequences for the environment and the change is not otherwise the subject of an application for approval under the Regulations or this permit:

- (a) the Environment Agency shall be notified at least 14 days before making the change; and
- (b) the notification shall contain a description of the proposed change in operation.

## **4.4 Interpretation**

4.4.1 In this permit the expressions listed in schedule 6 shall have the meaning given in that schedule.

4.4.2 In this permit references to reports and notifications mean written reports and notifications, except where reference is made to notification being made "without delay", in which case it may be provided by telephone.



# Schedule 1 - Operations

**Table S1.1 activities**

Description of activities for waste operations	Limits of activities
<b>R13:</b> Storage of waste pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced)	Secure storage of wastes listed in table S2.1  Physical treatment, composting and maturation of the types of waste listed in table S2.1
<b>R3:</b> Recycling/reclamation of organic substances which are not used as solvents	Waste types as specified in Table S2.1

**Table S1.2 Operating techniques**

Description	Parts	Date Received
Application	Sections 4, 5 and 6 of the Odour management plan (ref: 1175-3613) dated 13 September 2011, updated September 2012 in response to section 3b, Table 3b – General Requirements, Part B4 of the application form	10/09/12
Application	How to comply with your Environmental Permit in response to section 3a, Table 3a – technical standards, Part B4 of the application form	11/06/12
Response to request for information	Email from Aardvark EM Limited, received on 02/07/12, regarding source of waste to be treated at the site	02/07/12
	Sections 3 to 12 of the application document titled Heathrow Airport Local Operating Procedure (ref: HSSE-ENV-WAS-09-L03) dated August 2012 in response to section 3a – technical standards, Part B4 of the application form	28/08/12
	Sections 3, 4, 6 and 7 of the document titled Bioaerosol Risk Assessment (ref: 1175-3681) dated 15 June 2012 (updated September 2012, in response to request for information.	21/08/12
	Sections 3, 4, 6 and 7 of the document titled Bioaerosol Risk Assessment (ref: 1175-3681) dated 15 June 2012 (updated September 2012, in response to request for information.	21/08/12

## Schedule 2 - Waste types, raw materials and fuels

Table S2.1 Waste types and quantities for open windrow composting	
<b>Maximum Quantities</b>	
The total quantity of waste accepted at the site shall be no more than 1,500 tonnes a year.	
<b>Exclusions</b>	
Wastes having any of the following characteristics shall not be accepted:	
<ul style="list-style-type: none"> <li>• Consisting solely or mainly of dusts, powders or loose fibres</li> <li>• Catering waste and other wastes containing animal by-products covered by the Animal By-Products Regulations 2005 and The Animal By-Products (Wales) Regulations 2006.</li> <li>• Wastes that are in a form which is liquid</li> </ul>	
Waste Code	Description
<b>02</b>	<b>WASTES FROM AGRICULTURE, HORTICULTURE, AQUACULTURE, FORESTRY, HUNTING AND FISHING, FOOD PREPARATION AND PROCESSING</b>
<b>02 01</b>	<b>wastes from agriculture, horticulture, aquaculture, forestry, hunting and fishing</b>
02 01 03	plant-tissue waste
<b>17</b>	<b>CONSTRUCTION AND DEMOLITION WASTES (INCLUDING EXCAVATED SOIL FROM CONTAMINATED SITES)</b>
<b>17 05</b>	<b>soils (excluding excavated soils from contaminated sites), stones and dredging spoil</b>
17 05 06	dewatered dredging spoil and plant tissue waste from inland waters, not containing Japanese Knotweed and not containing dangerous substances'
<b>20</b>	<b>MUNICIPAL WASTES (HOUSEHOLD WASTE AND SIMILAR COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL WASTES) INCLUDING SEPARATELY COLLECTED FRACTION</b>
<b>20 02</b>	<b>garden and park wastes (including cemetery waste)</b>
20 02 01	biodegradable waste (plant matter only)
20 01 38	wood other than wood containing dangerous substances

## Schedule 3 – Emissions and monitoring

**Table S3.1 Process monitoring requirements**

Monitoring point	Substance or parameter	Monitoring frequency	Monitoring method	Other specifications
Internal for each windrow and for any sample of waste or compost	Temperature	None specified	Thermocouple probe	Monitoring equipment shall be available on-site and used as required to ensure compliance with this permit.
	Moisture	None specified	Moisture meter or moisture touch test	

## **Schedule 4 - Reporting**

There is no reporting under this schedule.

## Schedule 5 - Notification

These pages outline the information that the operator must provide.

Units of measurement used in information supplied under Part A and B requirements shall be appropriate to the circumstances of the emission. Where appropriate, a comparison should be made of actual emissions and authorised emission limits.

If any information is considered commercially confidential, it should be separated from non-confidential information, supplied on a separate sheet and accompanied by an application for commercial confidentiality under the provisions of the EP Regulations.

### Part A

Permit Number	
Name of operator	
Location of Facility	
Time and date of the detection	

**(a) Notification requirements for any malfunction, breakdown or failure of equipment or techniques, accident, or emission of a substance not controlled by an emission limit which has caused, is causing or may cause significant pollution**

**To be notified within 24 hours of detection**

Date and time of the event	
Reference or description of the location of the event	
Description of where any release into the environment took place	
Substances(s) potentially released	
Best estimate of the quantity or rate of release of substances	
Measures taken, or intended to be taken, to stop any emission	
Description of the failure or accident.	

**(b) Notification requirements for the breach of a limit**

**To be notified within 24 hours of detection unless otherwise specified below**

Emission point reference/ source	
Parameter(s)	
Limit	
Measured value and uncertainty	
Date and time of monitoring	
Measures taken, or intended to be taken, to stop the emission	

Time periods for notification following detection of a breach of a limit	
Parameter	Notification period

(c) Notification requirements for the detection of any significant adverse environmental effect	
To be notified within 24 hours of detection	
Description of where the effect on the environment was detected	
Substances(s) detected	
Concentrations of substances detected	
Date of monitoring/sampling	

## Part B - to be submitted as soon as practicable

Any more accurate information on the matters for notification under Part A.	
Measures taken, or intended to be taken, to prevent a recurrence of the incident	
Measures taken, or intended to be taken, to rectify, limit or prevent any pollution of the environment which has been or may be caused by the emission	
The dates of any unauthorised emissions from the facility in the preceding 24 months.	

<b>Name*</b>	
<b>Post</b>	
<b>Signature</b>	
<b>Date</b>	

\* authorised to sign on behalf of the operator

## Schedule 6 - Interpretation

*“accident”* means an accident that may result in pollution.

*“Annex I”* means Annex I to Directive 2008/98/EC of the European Parliament and of the Council of on waste.

*“Annex II”* means Annex II to Directive 2008/98/EC of the European Parliament and of the Council of on waste.

*“application”* means the application for this permit, together with any additional information supplied by the operator as part of the application and any response to a notice served under Schedule 5 to the EP Regulations.

*“authorised officer”* means any person authorised by the Environment Agency under section 108(1) of The Environment Act 1995 to exercise, in accordance with the terms of any such authorisation, any power specified in section 108(4) of that Act.

*“building”* means a construction that has the objective of providing sheltering cover and minimising emissions of noise, particulate matter, odour and litter.

*“compost”* means solid particulate material that is the result of composting, which has been *sanitised* and *stabilised*, and which confers beneficial effects when added to soil, used as a component of growing media or used in another way in conjunction with plants.

*“composting”* means the biological decomposition of organic materials, under conditions that are predominantly aerobic and that allow the development of thermophilic temperatures as a result of biologically produced heat.

*“emissions to land”* includes emissions to groundwater.

*“EP Regulations”* means The Environmental Permitting (England and Wales) Regulations SI 2010 No.675 and words and expressions used in this permit which are also used in the Regulations have the same meanings as in those Regulations.

*“emissions of substances not controlled by emission limits”* means emissions of substances to air, water or land from the activities, either from the emission points specified in schedule 3 or from other localised or diffuse sources, which are not controlled by an emission or background concentration limit..

*“groundwater”* means all water, which is below the surface of the ground in the saturation zone and in direct contact with the ground or subsoil.

*“groundwater protection zones 1 and 2”* have the meaning given in the document titled "Groundwater Protection: Policy and Practice" published by the Environment Agency in 2006.

*“maturation”* means a stage when by agitating and turning the compost it no longer results in reheating and the monitored temperature falls to ambient without the compost being too dry or anaerobic. Phytotoxins that are formed during the 'active' composting phase are metabolised by micro-organisms, which will result in the final material not being harmful to plants. This usually coincides with drop in pH toward neutral, and the conversion of ammonia into nitrates and recolonisation of beneficial micro-organisms. The maturation phase may need active management by turning to prevent the material becoming anaerobic.

*"MCERTS"* means the Environment Agency's Monitoring Certification Scheme.

*"nearest sensitive receptors"* means the nearest place to the composting operations where people are likely to be for prolonged or frequent periods. This term would therefore apply to dwellings (including any associated gardens) and to workplaces where workers would frequently be present. It does not apply to the operators of composting facilities or their staff while carrying out the composting operation as their health is covered by Health and Safety legislation.

*"quarter"* means a calendar year quarter commencing on 1 January, 1 April, 1 July or 1 October.

*"R"* means a recovery operation provided for in Annex II to Directive 2008/98/EC of the European Parliament and of the Council on waste.

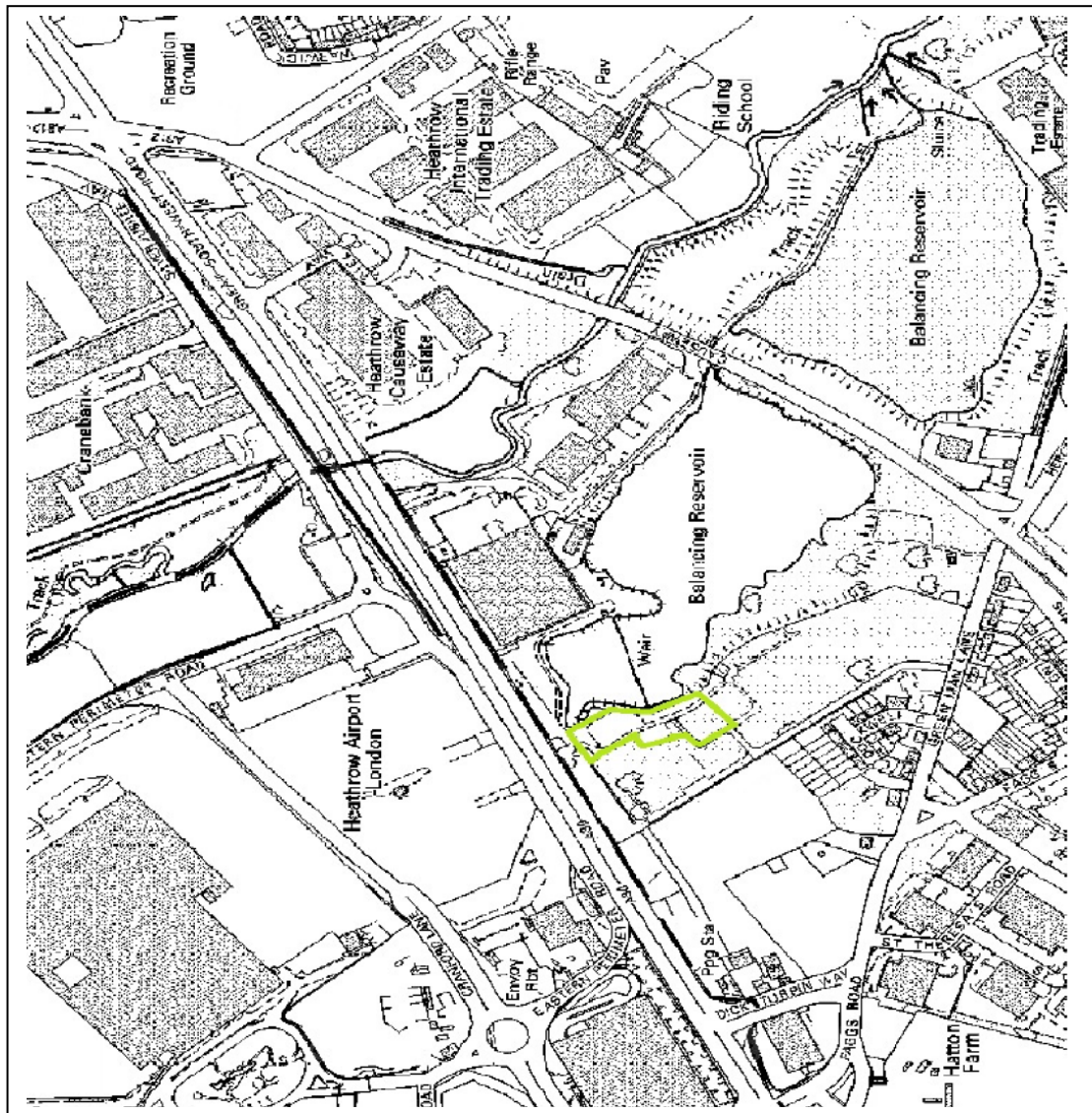
*"Waste code"* means the six digit code referable to a type of waste in accordance with the List of Wastes (England) Regulations 2005, or List of Wastes (Wales) Regulations 2005, as appropriate, and in relation to hazardous waste, includes the asterisk.

*"Waste Framework Directive" or "WFD"* means Waste Framework Directive 2008/98/EC of the European Parliament and of the Council on waste.

*"year"* means calendar year ending 31 December.



## Schedule 7 - Site plan



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END OF PERMIT