



Environment  
Agency

# Notice of variation and consolidation with introductory note

**The Environmental Permitting (England & Wales) Regulations 2016**

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Synergy Asset Services Limited

Merton Farm  
Merton Lane South  
Canterbury  
Kent  
CT4 7BA

**Variation application number**

EPR/FB3602HU/V002

**Permit number**

EPR/FB3602HU/V002

# Merton Farm

## Permit number EPR/FB3602HU

### Introductory note

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

Under the Environmental Permitting (England & Wales) Regulations 2016 (schedule 5, part 1, paragraph 19) a variation may comprise a consolidated permit reflecting the variations and a notice specifying the variations included in that consolidated permit.

Schedule 1 of the notice specifies the conditions that have been varied and schedule 2 comprises a consolidated permit which reflects the variations being made. Only the variations specified in schedule 1 are subject to a right of appeal.

This permit has been issued to add additional activities and is an operator led permit variation. The additional activities are:

- S5.3 A(1)(a)(ii) – disposal or recovery of hazardous waste with a capacity exceeding 10 tonnes per day by physico chemical treatment consisting of treatment of hazardous canisters and aerosols.
- 5.6 A(1)(a) – temporary storage of hazardous waste with a total capacity exceeding 50 tonnes at any one time.

The following Directly Associated Activities (DAAs) have been added to the permit:

- Residual collection and storage of gases and liquids.
- Surface and process water collection and storage.
- Raw materials storage.

The following waste operations have also been varied:

- The annual throughput of non-hazardous waste for storage and treatment has increased to 25,000 per year.
- The waste operation previously permitted for transferring hazardous and non-hazardous waste (below 50 tonnes) has been amended to cover only non-hazardous waste. Hazardous waste is now regulated under the new S5.3 A(1)(a)(ii) activity. Additionally, a new European Waste Catalogue (EWC) code has been added to include end-of-life tyres, which are accepted for transfer only.

The main features of the permit are as follows.

Merton Farm is situated within a rural setting, approximately 850m north west from the village of Nackington. The site is centred at approximate National Grid Reference (NGR) TR 15054 55108.

The permitted waste activities at Merton Farm will consist of the storage, treatment and transfer of hazardous and non-hazardous waste gas canisters. The treatment of gas canisters is limited to the discharge of the contents and dismantling by removal of valves and other parts from cylinders to allow recycling of the metals, plastic and rubber. End of Life tyres are for transfer off site only. The maximum annual throughput is 30,000.

All gases in pressure containers/aerosols will be stored securely under cover in well-ventilated containers, within caged storage areas. There are no emissions to air from the treatment of waste gases in pressure containers. The treatment of non-hazardous waste gases in pressure containers and aerosols remains the same and is not part of this variation. There are no emissions to land or water from the activities. All gases released during treatment of hazardous canisters and aerosols are contained by the bespoke equipment.

All runoff from waste storage areas and treatment areas excluding roof water are tankered off site to an appropriate waste facility.

The schedules specify the changes made to the permit.

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

Status log of the permit		
Description	Date	Comments
Application EPR/FB3602HU/A001	Duly made 11/07/2018	Permit application for a hazardous and non-hazardous waste transfer station.
Additional information received	06/11/2018	Submission of updated ISO 14001 Certificate.
Additional information received	04/12/2018	Submission of Drainage Plans.
Additional information received	06/02/2019	Submission of updated Fire Prevention Plan.
Additional information received	13/03/2019	Submission of updated Site Layout Plan and Risk Assessment.
Additional information received	22/03/2019	Submission of updated Operating Techniques.
Permit determined EPR/FB3602HU	27/03/2019	Permit issued to Synergy Asset Services Limited.
Application received FB3602HU/V002 (variation and consolidation)	Duly made 19/03/2024	Application to vary and add hazardous waste canisters and aerosols for treatment and to allow temporary storage of hazardous waste with a capacity exceeding 50 tonnes. In addition, the application increases the annual tonnage to 30,000 and adds a new waste code for end-of-life tyres.
Schedule 5 Request	01/05/2025	Information received by email in response to schedule 5 request dated 01/05/2025 containing "Gas Cylinder Processing at Synergy" procedure.
Schedule 5 Request	19/06/2025	Information received by email in response to schedule 5 request dated 20/08/2025 containing <ul style="list-style-type: none"> <li>018.1_05_004 FPP V4</li> <li>018.1_05_009 BAT</li> </ul>
Request for more information	01/09/2025	Information received by email on 15/09/2025 regarding storage arrangements of canisters.
	08/09/2025	<ul style="list-style-type: none"> <li>Information received by email on 22/09/2025 containing:</li> <li>018.1_09_003 FWC REV D</li> <li>018.1_09_004 site pan REV D</li> <li>018.1_09_009 Drainage REV D</li> </ul>
	23/10/2025	Information received by email on 05/11/2025 containing: <ul style="list-style-type: none"> <li>018.1_05_003 EMS_OT V4</li> <li>018.1_05_005 AM V4</li> <li>018.1_05_006 SCR V3</li> <li>018.1_09_001 Permit Boundary REV A</li> </ul>
Request for more information	25/11/2025	Information received by email on 27/11/2025 containing drawing reference '018.1_09_011 Pre Op Construction REV A'.

Status log of the permit		
Description	Date	Comments
Variation determined and consolidation issued EPR/FB3602HU	19/12/2025	Varied and consolidated permit issued in modern format

End of introductory note

# Notice of variation and consolidation

## The Environmental Permitting (England and Wales) Regulations 2016

The Environment Agency in exercise of its powers under regulation 20 of the Environmental Permitting (England and Wales) Regulations 2016 varies

### Permit number

**EPR/FB3602HU**

### Issued to

**Synergy Asset Services Limited** (“the operator”)

whose registered office is

**Merton Farm  
Merton Lane South  
Canterbury  
Kent  
CT4 7BA**

company registration number 04264601

to operate regulated facilities at

**Merton Farm  
Merton Lane South  
Canterbury  
Kent  
CT4 7BA**

to the extent set out in the schedules.

The notice shall take effect from 19/12/2025

Name	Date
<b>Peter Maksymiw</b>	<b>19/12/2025</b>

Authorised on behalf of the Environment Agency

## Schedule 1

The following conditions were varied and added as a result of the application made by the operator:

- Condition 1.2.1 related to energy efficiency has been added to update to modern template conditions.
- Condition 1.3.1 related to efficient use of raw materials has been added to update to the modern template conditions.
- Condition 2.1.2 on permitted activities has been added to update to the modern template conditions.
- Condition 2.3.2 and 2.3.3, 2.3.5 and 2.3.6 have been added to update operating techniques to modern permit conditions.
- Condition 3.1.1 emissions and monitoring have been added to update the permit to modern permit conditions
- Condition 4.2.2 and 4.2.3 reporting have been added to update the permit to modern permit conditions
- Condition 4.3.2 and 4.3.7 notifications have been added to update the permit to modern permit conditions
- Table S1.1 as referenced in conditions 1.2.1, 1.3.1, 2.1.1, 2.4.1 and 4.2.2 has been amended to clearly define the activities that are undertaken at the site and to apply relevant limits to them.
- Table S1.2 as referenced in conditions 2.3.1 and 2.3.2 has been amended to incorporate operating technique documents submitted in response to schedule 5s and requests for information.
- Table S1.3 as referenced in condition 2.5.1 has been included to detail a pre operational requirement.
- Table S2.1 has been added for raw material and fuel usage.
- Table S2.2, S2.3 and S2.4 as referenced in condition 2.3.4 have been updated to incorporate the new European Waste Codes (EWCs).
- Table S4.1, S4.2 and S4.3 have been updated to incorporate the new reporting requirements.
- Schedule 6 as referenced in condition 4.4.1 has been amended by adding additional interpretations that are relevant to the changes made as a result of this variation and by updating some of the existing interpretations.

## Schedule 2 – consolidated permit

Consolidated permit issued as a separate document.

# Permit

## The Environmental Permitting (England and Wales) Regulations 2016

### Permit number

**EPR/FB3602HU**

This is the consolidated permit referred to in the variation and consolidation notice for application  
EPR/FB3602HU/V002 authorising,

**Synergy Asset Services Limited** (“the operator”),

whose registered office is

**Merton Farm  
Merton Lane South  
Canterbury  
Kent  
CT4 7BA**

company registration number 04264601

to operate an installation and waste operations at

**Merton Farm  
Merton Lane South  
Canterbury  
Kent  
CT4 7BA**

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

Name	Date
<b>Peter Maksymiw</b>	<b>19/12/2025</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, closure 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 Energy efficiency

- 1.2.1 For the following activities referenced in schedule 1, table S1.1 (AR1 to AR5) The operator shall:
- (a) take appropriate measures to ensure that energy is used efficiently in the activities;
  - (b) review and record at least every four years whether there are suitable opportunities to improve the energy efficiency of the activities; and
  - (c) take any further appropriate measures identified by a review.

### 1.3 Efficient use of raw materials

- 1.3.1 For the following activities referenced in schedule 1, table S1.1 (AR1 to AR5) The operator shall:
- (a) take appropriate measures to ensure that raw materials and water are used efficiently in the activities;
  - (b) maintain records of raw materials and water used in the activities;
  - (c) review and record at least every four years whether there are suitable alternative materials that could reduce environmental impact or opportunities to improve the efficiency of raw material and water use; and
  - (d) take any further appropriate measures identified by a review.

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

- 1.4.1 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.



- 1.4.2 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”).
- 2.1.2 Waste authorised by this permit shall be clearly distinguished from any other waste on the site.

### **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 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.
- 2.3.2 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 or other documentation (“plan”) specified in schedule 1, table S1.2 or otherwise required under this permit which identifies and minimises the risks of pollution relevant to that plan, 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.
- 2.3.3 Any raw materials or fuels listed in schedule 2 table S2.1 shall conform to the specifications set out in that table.
- 2.3.4 Waste shall only be accepted if:
- (a) it is of a type and quantity listed in schedule 2 tables S2.2, S2.3; and S2.4
  - (b) it conforms to the description in the documentation supplied by the producer and holder.
- 2.3.5 The operator shall ensure that where waste produced by the activities is sent to a relevant waste operation, that operation is provided with the following information, prior to the receipt of the waste:
- (a) the nature of the process producing the waste;
  - (b) the composition of the waste;
  - (c) the handling requirements of the waste;
  - (d) the hazardous property associated with the waste, if applicable; and
  - (e) the waste code of the waste.
- 2.3.6 The operator shall ensure that where waste produced by the activities is sent to a landfill site, it meets the waste acceptance criteria for that landfill

## **2.4 Technical requirements**

### **Hazardous waste storage and treatment**

- 2.4.1 Hazardous waste shall not be mixed, either with a different category of hazardous waste or with other waste, substances or materials, unless it is authorised by schedule 1 table S1.1 and appropriate measures are taken.

## **2.5 Pre-operational measures**

- 2.5.1 The activities shall not be brought into operation until the measures specified in schedule 1 table S1.3 have been completed

## **3 Emissions and monitoring**

### **3.1 Emissions to water, air or land**

- 3.1.1 Periodic monitoring shall be carried out at least once every 5 years for groundwater and 10 years for soil, unless such monitoring is based on a systematic appraisal of the risk of contamination.

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

- 3.2.1 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.
- 3.2.2 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 which identifies and minimises the risks of pollution from emissions of substances not controlled by emission limits;
  - (b) implement the approved emissions management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.
- 3.2.3 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.

### **3.3 Odour**

- 3.3.1 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.
- 3.3.2 The operator shall:
- (a) if notified by the Environment Agency that the activities are giving rise to pollution outside the site due to odour, submit to the Environment Agency for approval within the period specified, an odour management plan which identifies and minimises the risks of pollution from odour;
  - (b) implement the approved odour management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.

### **3.4 Noise and vibration**

- 3.4.1 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.
- 3.4.2 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 which identifies and minimises the risks of pollution from noise and vibration;
  - (b) implement the approved noise and vibration management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.

### **3.5 Fire prevention**

- 3.5.1 The operator shall take all appropriate measures to prevent fires on site and minimise the risk of pollution from them including, but not limited to, those specified in any approved fire prevention plan.
- 3.5.2 The operator shall:
- (a) if notified by the Environment Agency that the activities are giving rise to a risk of fire, submit to the Environment Agency for approval within the period specified, a fire prevention plan which prevents fires and minimises the risk of pollution from fires;
  - (b) implement the fire prevention plan, from the date of approval, 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 For the following activities referenced in schedule 1, table S1.1 (AR1 to AR5) A report or reports on the performance of the activities over the previous year shall be submitted to the Environment Agency by 31 January (or other date agreed in writing by the Environment Agency) each year. The report(s) shall include as a minimum:
- (a) a review of the results of the monitoring and assessment carried out in accordance with the permit including an interpretive review of that data;
  - (b) the annual production /treatment data set out in schedule 4 table S4.1; and
  - (c) the performance parameters set out in schedule 4 table S4.2 using the forms specified in table S4.3 of that schedule.
- 4.2.3 The operator shall, unless notice under this condition has been served within the preceding four years, submit to the Environment Agency, within six months of receipt of a written notice, a report assessing whether there are other appropriate measures that could be taken to prevent, or where that is not practicable, to minimise pollution.
- 4.2.4 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 In the event:
- (a) that the operation of the activities gives rise to an incident or accident which significantly affects or may significantly affect the environment, the operator must immediately—
    - (i) inform the Environment Agency,
    - (ii) take the measures necessary to limit the environmental consequences of such an incident or accident, and
    - (iii) take the measures necessary to prevent further possible incidents or accidents;
  - (b) of a breach of any permit condition the operator must immediately—
    - (i) inform the Environment Agency, and
    - (ii) take the measures necessary to ensure that compliance is restored within the shortest possible time;
  - (c) of a breach of permit condition which poses an immediate danger to human health or threatens to cause an immediate significant adverse effect on the environment, the operator must immediately suspend the operation of the activities or the relevant part of it until compliance with the permit conditions has been restored.
- 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.

In any other case:

- (a) the death of any of the named operators (where the operator consists of more than one named individual);
- (b) any change in the operator's name(s) or address(es); and
- (c) any steps taken with a view to the operator, or any one of them, going into bankruptcy, entering into a composition or arrangement with creditors, or, in the case of them being in a partnership, dissolving the partnership.

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.

4.3.6 The Environment Agency shall be given at least 14 days' notice before implementation of any part of the site closure plan

## **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			
Activity reference	Activity listed in Schedule 1 of the EP Regulations	Description of specified activity and WFD Annex I and II operations	Limits of specified activity and waste types
AR1	S5.3 A(1) (a) (ii) Disposal or recovery of hazardous waste with a capacity exceeding 10 tonnes per day involving physico-chemical treatment.	<p>Recovery of hazardous waste gases in pressure containers and aerosols with a capacity exceeding 10 tonnes per day involving physico-chemical treatment</p> <p>R3: Recycling/reclamation of organic substances which are not used as solvents (including composting and other biological transformation processes)</p> <p>R4: Recycling/reclamation of metals and metal compounds</p> <p>R5: Recycling/reclamation of other inorganic materials</p>	<p>From treatment of hazardous waste gases in pressure containers and aerosols by piercing, removal of liquid, powder and gas , and manual dismantling and removal of valves and other parts from cylinders to allow recycling of the metals, plastics and rubber.</p> <p>Treatment shall only take place on an impermeable surface with a sealed drainage system.</p> <p>Treatment of hazardous gases in pressure containers and aerosols shall be carried out in an enclosed plant.</p> <p>There shall be no emissions to air, land or water from this activity.</p> <p>No more than 90 tonnes of waste shall be treated per day.</p> <p>Waste types suitable for acceptance are limited to those waste types specified in Table S2.2.</p>
AR2	Section 5.6 A(1)(a) Temporary storage of hazardous waste in a facility with a total capacity exceeding 50 tonnes pending any of the activities listed in Section 5.1, 5.2 and 5.3.	<p>Storage of hazardous waste pending on-site treatment</p> <p>R13: Storage of waste pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced</p> <p>D15: Storage pending any of the operations numbered</p>	<p>From receipt and storage of hazardous waste to its treatment on site.</p> <p>The maximum quantity of waste that can be stored at the site shall not exceed 250 tonnes at any one time.</p> <p>Gases in pressure containers shall be securely stored under cover in well-ventilated containers,</p>

Table S1.1 activities			
Activity reference	Activity listed in Schedule 1 of the EP Regulations	Description of specified activity and WFD Annex I and II operations	Limits of specified activity and waste types
		D1 to D14	<p>and/or within a caged storage area.</p> <p>Gas canisters shall only be stored for up to 6 months and be stored on an impermeable surface with a sealed drainage system.</p> <p>Waste types suitable for acceptance are limited to those waste types specified in Table S2.2.</p>
Directly Associated Activity			
AR3	Residual collection and storage of resultant gases and liquids arising from AR1 activity	Collection of residual gases and liquid from treatment of canisters and aerosols.	From the capture of residual gases liquids and powder during treatment of hazardous canisters and aerosols, through to offsite removal in IBCs and tanks.
AR4	Surface and process water collection and storage	Collection of contaminated and uncontaminated site surface and process water excluding roof water during storage and treatment of gases in pressure containers and aerosols.	From the surface water collection system within the wet room and runoff from the storage area sumps through to removal in IBCs and tanks
AR5	Raw materials storage	Storage of raw materials including lubrication greases and hydraulic oils.	From the receipt of raw materials to despatch for use within the facility.
Activity reference	Description of activities for waste operations		Limits of activities

Table S1.1 activities			
Activity reference	Activity listed in Schedule 1 of the EP Regulations	Description of specified activity and WFD Annex I and II operations	Limits of specified activity and waste types
AR6	<p>Transfer of non-hazardous waste</p> <p>R13: Storage of waste pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where the waste is produced)</p> <p>D15: Storage pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where the waste is produced)</p>	<p>From receipt of waste to storage of non-hazardous waste prior to transfer off site.</p> <p>Gases in pressure containers shall be securely stored under cover in well-ventilated containers, and/or within a caged storage area.</p> <p>Gases in pressure containers shall only be stored for up to 6 months and must be stored on an impermeable surface with sealed drainage.</p> <p>The maximum quantity of waste that can be stored at the site shall not exceed 250 tonnes at any one time.</p> <p>The maximum quantity of end-of-life tyres stored on site at anyone time shall not exceed 25 tonnes. End of Life tyres shall only be stored up to maximum 6 months.</p> <p>Subject to any other requirements of this permit wastes shall be stored for no longer than 6 months.</p> <p>Waste types suitable for acceptance are limited to those waste types specified in Table S2.3.</p>	
AR7	<p>Treatment of non-hazardous waste</p> <p>R3: Recycling/reclamation of organic substances which are not used as solvents (including composting and other biological transformation processes)</p> <p>R4: Recycling/reclamation of metals and metal compounds</p> <p>R5: Recycling/reclamation of other inorganic materials</p> <p>R13: Storage of waste pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where the waste is produced)</p>	<p>From treatment of waste to storage of treated waste.</p> <p>Treatment consisting only of removal of contents, venting of gases to atmosphere and manual dismantling by removal of valves and other parts from cylinders to allow recycling of the metals, plastic and rubber.</p> <p>Treatment shall only take place on an impermeable surface with a sealed drainage system.</p> <p>No more than 90 tonnes of waste shall be treated per day.</p> <p>Waste types suitable for acceptance are limited to those waste types specified in Table S2.4.</p>	



Table S1.2 Operating techniques		
Description	Parts	Date Received
Application EPR/FB3602HU/A001	Responses to Parts B2 and B4 of the application form and referenced supporting documentation.	Duly Made 11/07/18
Response to Schedule 5 Notice dated 19/10/18	Site surface drainage (reference: SYN-A108683-MF-SW-01 - Drainage of Surface Water, dated: 29/11/18). Drainage Plan (reference: DRA/01 - revision 2, dated 29/11/18).	04/12/18
Response to request for information dated 24/01/19	Fire Prevention Plan (reference: Fire Prevention Plan - Version 2, dated: 04/01/19).	06/02/19
Response to request for information dated 26/02/19	Site Layout Plan (reference: SYN/A108683/MF/LAY/01 - Revision 4, dated: 04/02/19). Environmental Risk Assessment (reference: Environmental Risk Assessment v5, dated: 01/03/19).	13/03/19
	Operating Techniques (reference: Operating Techniques v5, dated: 01/03/19).	22/03/19
Variation application EPR/FB3602HU/V002	Responses to application form, Part C4. Responses to application form C3, Part 1a Hazardous waste treatment capacity per day and annual throughput (tonnes each year).	12/07/24
Schedule 5 Request dated 19/06/2025	Updated Fire Prevention Plan document referenced "018.1_05_004 FPP V4". Best Available Techniques document referenced "018.1_05_009 BAT".	20/08/25
Request For more Information 08/09/2025	Updated site plan document referenced "018.1_09_003 FWC REV D".	22/09/25
Request For more Information dated 23/10/25	Updated Operating techniques document reference 018.1_05_003 EMS_OT V4. Appropriate measures document referenced 018.1_05_005 AM V4. Updated permitted Area document reference 018.1_09_001 Permit Boundary REV A.	05/11/25
Request for more information dated 25/11/25	Pre Operational requirements document referenced 018.1_09_011 Pre Op Construction REV A.	27/11/25

Table S1.3 pre-operational measures for future development		
Reference	Operation	Pre-operational measures
P01	Storage within areas Area 2 and Area 3 on the site layout plan reference '018.1_09_011 Pre Op Construction REV A'.	At least 4 weeks prior to the receipt and storage of waste within the identified waste storage areas - Areas 2 and 3, the operator shall submit a post-construction report to the Environment Agency for assessment and written approval. The report shall include:

Table S1.3 pre-operational measures for future development		
Reference	Operation	Pre-operational measures
		<p>Detailed information on the design and construction specifications of the impermeable surface, sealed drainage and containment system within the identified waste storage.</p> <p>A summary statement by a suitably qualified engineer to certify that the construction and integrity of the impermeable surface, sealed drainage and containment system were in line with, or equivalent to the standards specified in CIRIA Report C736.</p> <p>A maintenance and inspection regime.</p>

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

Table S2.1 Raw materials and fuels	
Raw materials and fuel description	Specification
Deisel	--
Hydraulic Oils	--
Lubricating oils	--

Table S2.2 Permitted waste types and quantities for the storage and treatment of hazardous waste aerosols and canisters under AR1 and AR2 Activities.	
Maximum quantity	The total quantity of hazardous waste accepted at the site for shall not exceed 5,000 tonnes a year.
Waste code	Description
<b>15</b>	<b>Waste packaging, absorbents, wiping cloths, filter materials and protective clothing not otherwise specified</b>
<b>15 01</b>	<b>packaging (including separately collected municipal packaging waste)</b>
15 01 10*	packaging containing residues of or contaminated by hazardous substances (canisters only).
<b>16</b>	<b>Wastes not otherwise specified in the list</b>
<b>16 05</b>	<b>gases in pressure containers and discarded chemicals</b>
16 05 04*	gases in pressure containers (including halons) containing hazardous substances.

Table S2.3 Permitted waste types and quantities for the storage and transfer of non-hazardous waste under AR6 Activity.	
Maximum quantity	The total quantity of non-hazardous waste accepted at the site shall not exceed 25,000 tonnes a year.
Waste code	Description
<b>15</b>	<b>Waste packaging, absorbents, wiping cloths, filter materials and protective clothing not otherwise specified</b>
<b>15 01</b>	<b>packaging (including separately collected municipal packaging waste)</b>
15 01 04	metallic packaging (canisters only).
<b>16</b>	<b>Wastes not otherwise specified in the list</b>
<b>16 01</b>	<b>end-of-life vehicles from different means of transport (including off-road machinery) and wastes from dismantling of end-of-life vehicles and vehicle maintenance (except 13, 14, 16 06 and 16 08)</b>
16 01 03	end-of-life tyres.
<b>16 05</b>	<b>gases in pressure containers and discarded chemicals</b>
16 05 05	gases in pressure containers other than those mentioned in 16 05 04.

Table S2.4 Permitted waste types and quantities for the treatment of non-hazardous waste under AR7 Activity.	
Maximum quantity	The total quantity of waste accepted shall not exceed 25,000 tonnes a year.
Waste code	Description
<b>15</b>	<b>Waste packaging, absorbents, wiping cloths, filter materials and protective clothing not otherwise specified</b>
<b>15 01</b>	<b>packaging (including separately collected municipal packaging waste)</b>
15 01 04	metallic packaging (canisters only)
<b>16</b>	<b>Wastes not otherwise specified in the list</b>
<b>16 05</b>	<b>gases in pressure containers and discarded chemicals</b>
16 05 05	gases in pressure containers other than those mentioned in 16 05 04.

## **Schedule 3 – Emissions and monitoring**

There are no emission limits or associated monitoring requirements.

## Schedule 4 – Reporting

Table S4.1 Annual production/treatment	
Parameter	Units
Hazardous waste - Canisters/Aerosols treated	tonnes
Non-hazardous waste treated	tonnes
Non-ferrous metal recovered	tonnes
Ferrous metal recovered	tonnes
Other fractions recovered	tonnes

Table S4.2 Performance parameters		
Parameter	Frequency of assessment	Units
Water usage	Annually	m <sup>3</sup>
Energy usage	Annually	MWh
Total raw material used	Annually	tonne

Table S4.3 Reporting forms		
Media/parameter	Reporting format	Date of form
Water usage	Form water usage 1 or other form as agreed in writing by the Environment Agency	08/03/21
Energy usage	Form energy 1 or other form as agreed in writing by the Environment Agency	08/03/21
Other performance indicators	Form performance 1 or other form as agreed in writing by the Environment Agency	08/03/21
Waste returns	E-waste returns	--

## 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	

<b>(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</b>	
<b>To be notified within 24 hours of detection</b>	
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>(b) Notification requirements for the breach of a limit</b>	
<b>To be notified within 24 hours of detection unless otherwise specified below</b>	
Emission point reference/ source	
Parameter(s)	
Limit	
Measured value and uncertainty	
Date and time of monitoring	

<b>(b) Notification requirements for the breach of a limit</b>	
<b>To be notified within 24 hours of detection unless otherwise specified below</b>	
Measures taken, or intended to be taken, to stop the emission	

<b>Time periods for notification following detection of a breach of a limit</b>	
<b>Parameter</b>	<b>Notification period</b>

<b>(c) Notification requirements for the breach of permit conditions not related to limits</b>	
<b>To be notified within 24 hours of detection</b>	
Condition breached	
Date, time and duration of breach	
Details of the permit breach i.e. what happened including impacts observed.	
Measures taken, or intended to be taken, to restore permit compliance.	

<b>(d) Notification requirements for the detection of any significant adverse environmental effect</b>	
<b>To be notified within 24 hours of detection</b>	
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 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.

“container” is a receptacle for waste for example bags, bins, boxes, drums, IBCs and blister packs. Wastes may be packaged in more than one receptacle for example a bag in a box.

“emissions to land” includes emissions to groundwater.

“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.

“EP Regulations” means The Environmental Permitting (England and Wales) Regulations SI 2016 No.1154 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.

“Hazardous property” has the meaning in Annex III of the Waste Framework Directive.

“Hazardous waste” has the meaning given in the Hazardous Waste (England and Wales) Regulations 2005 (as amended).

“impermeable surface” means a surface or pavement constructed and maintained to a standard sufficient to prevent the transmission of liquids beyond the pavement surface.

“Industrial Emissions Directive” means DIRECTIVE 2010/75/EU OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 24 November 2010 on industrial emissions as read in accordance with Schedule 1A to the Environmental Permitting (England and Wales) Regulations 2016.

“List of Wastes” means the list of wastes established by Commission Decision 2000/532/EC replacing Decision 94/3/EC establishing a list of wastes pursuant to Article 1(a) of Council Directive 75/442/EEC on waste and Council Decision 94/904/EC establishing a list of hazardous waste pursuant to Article 1(4) of Council Directive 91/689/EEC on hazardous waste.

Pests” means Birds, Vermin and Insects.

“pollution” includes pollution of the environment, harm to human health and serious detriment to the amenities of the locality, resulting from the permitted activities.

“quarter” means a calendar year quarter commencing on 1 January, 1 April, 1 July or 1 October.

“recovery” means any of the operations provided for in Annex II to Directive 2008/98/EC of the European Parliament and of the Council on waste as read in accordance with Schedule 1A to the Environmental Permitting (England and Wales) Regulations 2016.

“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.

“sealed drainage” in relation to an impermeable surface means a drainage system with impermeable components which does not leak and which will ensure that:

- no liquid will run off the surface otherwise than via the system, and
- except where they may lawfully be discharged to foul sewer, all liquids entering the system are collected in a sealed sump.

“Waste code” means the six digit code referable to a type of waste in accordance with the List of Wastes 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 as read in accordance with Schedule 1A to the Environmental Permitting (England and Wales) Regulations 2016

“year” means calendar year ending 31 December.

When the following terms appear in the waste code list in Schedule 2, table S2.2, for that table they have the meaning given below:

“hazardous substance” means a substance classified as hazardous as a consequence of fulfilling the criteria laid down in parts 2 to 5 of Annex I to Regulation (EC) No 1272/2008.

Schedule 7 – Site plan



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END OF PERMIT

## Water Usage Reporting Form

**Permit number:**     EPR/ FB3602HU

**Operator:** Synergy Asset Services Limited

**Facility name:**     Merton Farm

**Water Usage Reporting Form: version 1, 08/03/2021**

Reporting of water usage for the year [YYYY]

Water source	Water usage (m <sup>3</sup> )	Specific water usage (m <sup>3</sup> /unit) <sup>2</sup>
Mains water	<i>[insert annual usage in m<sup>3</sup> where mains water is used]</i>	<i>[insert annual usage in m<sup>3</sup>/unit where mains water is used]</i>
Site borehole	<i>[insert annual usage in m<sup>3</sup> where water is used from a site borehole]</i>	<i>[insert annual usage in m<sup>3</sup>/unit where water is used from a site borehole]</i>
River abstraction	<i>[insert annual usage in m<sup>3</sup> where abstracted river water is used]</i>	<i>[insert annual usage in m<sup>3</sup>/unit where abstracted river water is used]</i>
Other – <i>[specify other water source where applicable. Add extra rows where needed]</i>	<i>[insert annual usage in m<sup>3</sup> where applicable]</i>	<i>[insert annual usage in m<sup>3</sup>/unit where applicable]</i>
Total water usage	<i>[insert total annual water usage in m<sup>3</sup>]</i>	<i>[insert total annual water usage in m<sup>3</sup>/unit]</i>

<b>Operator's comments</b>

<b>Operator's comments</b>

**Signed:**     *[Name]*

**Date:**        *[DD/MM/YY]*

(Authorised to sign as representative of the operator)

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**Guidance for use:** Use this form to report your annual water usage.  
Example text is shown in bracketed grey italics. Replace the example text by entering your own site specific information. Add additional rows as necessary.

## Energy Usage Reporting Form

**Permit number:**     EPR/ FB3602HU

**Operator:**   Synergy Asset Services Limited

**Facility name:**     Merton Farm

**Energy Usage Reporting Form: version 1, 08/03/2021**

Reporting of energy usage for the year [YYYY]

Energy source	Energy consumption / production (MWh)	Specific energy consumption (MWh/unit) <sup>2</sup>
Electricity imported as delivered - source [specify source, e.g. supplied from the national grid]	<i>[insert annual consumption in MWh where electricity is imported]</i>	<i>[insert annual consumption in MWh/unit where electricity is imported]</i>
Electricity imported as primary energy 1 – conversion factor of [specify conversion factor used to convert electricity delivered to primary energy]	<i>[insert annual consumption in MWh where electricity is imported]</i>	<i>[insert annual consumption in MWh/unit where electricity is imported]</i>
Natural gas	<i>[insert annual consumption in MWh where natural gas is used]</i>	<i>[insert annual consumption in MWh/unit where natural gas is used]</i>
Gas oil – conversion factor of [specify conversion factor used to convert tonnes to MWh]	<i>[insert annual consumption in MWh where gas oil is used]</i>	<i>[insert annual consumption in MWh/unit where gas oil is used]</i>
Imported heat	<i>[insert annual consumption in MWh where heat is imported]</i>	<i>[insert annual consumption in MWh/unit where heat is imported]</i>
Other – <i>[specify other energy source and conversion</i>	<i>[insert annual consumption in MWh</i>	<i>[insert annual consumption in MWh/unit</i>

Energy source	Energy consumption / production (MWh)	Specific energy consumption (MWh/unit) <sup>2</sup>
<i>factors where applicable, e.g. renewable fuel. Add extra rows where needed]</i>	<i>where applicable]</i>	<i>where applicable]</i>
Electricity exported	<i>[insert annual production in MWh where electricity is exported]</i>	Not applicable
Heat exported	<i>[insert annual production in MWh where heat is exported]</i>	Not applicable

<b>Operator's comments</b>

**Signed:**     *[Name]*

**Date:**        *[DD/MM/YY]*

(Authorised to sign as representative of the operator)

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**Guidance for use:** Use this form to report your annual energy usage.

Example text is shown in bracketed grey italics. Replace the example text by entering your own site specific information. Add additional rows as necessary.

<sup>1</sup> Multiply delivered electricity by 2.4 to convert to primary energy where the electricity is supplied from the national grid. If the electricity is supplied from another source, specify the conversion factor used. Add additional rows as needed if electricity is imported from multiple sources.

<sup>2</sup> Divide energy consumption by an appropriate unit of raw material processed or product output



## Other Performance Parameters Reporting Form

Permit number:   EPR/ FB3602HU

Operator:   Synergy Asset Services Limited

Facility name:   Merton Farm

Other Performance Parameters Reporting Form: version 1, 08/03/2021

Reporting of other performance parameters for the period from *[DD/MM/YY]* to *[DD/MM/YY]*

Parameter	Units
<i>[e.g. Total raw material usage]</i>	<i>[e.g. tonnes per production unit]</i>

**Operator's comments**

<b>Operator's comments</b>

**Signed:**     *[Name]*

**Date:**       *[DD/MM/YY]*

(Authorised to sign as representative of the operator)

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**Guidance for use:** Use this form to report the performance parameters (other than water and energy) required by your permit. Example text is shown in bracketed grey italics. Replace the example text by entering your own site specific information. The parameters to report and units to be used can be found in the 'Performance parameters' table in schedule 4 of your permit. Add additional rows as necessary.