

Powys County Council North Powys Bulking Facility



Environmental Permit Application

Non-Technical Summary

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Acknowledgements

The content of this Report has been based upon information provided by WRAP Cymru and Powys County Council.

1.0 Introduction

The Waste and Resource Action Programme (WRAP), on behalf of Powys County Council (PCC) has retained SLR Consulting Limited (SLR) to prepare an Environmental Permit (EP) application for the proposed North Powys Bulking Facility, under the Environmental Permitting (England and Wales) Regulations 2016 (as amended).

This document provides a Non-Technical Summary (NTS) of application including:

- An explanation of what is being applied for;
- A summary of the regulated facilities; and
- A summary of the key technical standards and control measures relating to the proposed changes.

1.1 Site Location

The site is situated in Abermule Business Park, approximately 5km north west of Newtown and approximately 500m south of the village of Abermule. The A483 runs to the west of the site with the River Severn and Montgomery Canal located to the north. The National Grid Reference (NGR) for the site is SO 15743 94208.

The site is predominantly surrounded by open/agricultural ground and areas of woodland. Several business units, currently under construction, are located adjacent to the site's north eastern boundary. To the east of the site is a small residential area with the larger residential village of Abermule located to the north. The site's location and the EP boundary are illustrated on Drawing 004.

The surrounding land uses and local receptors within 500m are identified on Drawing 001, Environmental Site Setting, in addition to the cultural and natural heritage within 1km.

A summary of the site's immediate surrounding land uses is identified in Table 1-1 below.

Table 1-1
Surrounding Land Uses

Boundary	Description
North	Abermule Business Park including several business units, the B4386 and the A483, followed by open ground. Beyond this lies the River Severn, Montgomery Canal and the residential area of Abermule.
East	Adjacent to the site's eastern boundary lies the railway line. This is followed by a small pond, several drains and open ground. Beyond this lies an area of ancient woodland.
South	Immediately to the south runs a railway line, surrounded by a small strip of woodland. Beyond this lies open ground.
West	The A483 road followed by open ground and farm/agricultural buildings. Beyond this runs the River Severn, Montgomery Canal and areas of ancient woodland.

1.2 Pre-Application Discussions

A pre-application meeting was carried out on the 28th July 2020 with Liz Park from NRW. The project background was discussed, and the following points were agreed:

- A PMP will be included in the application to ensure comprehensive management and prevention measures are included within the Environmental Management System (EMS);
- It was agreed that an automatic fire suppression system will not be installed within the building because, as stipulated in WISH 28¹, high-level sprinklers in buildings over a certain height have not proven to be effective in extinguishing fires;
- The EMS and FP&MP will include detailed procedures regarding how material storage times will be minimised on site;
- An OIA and OMP will be required;
- The management of food waste and whether it will be stored in a sealed skip or within a bay on the floor of the building and that this material stream will need to be assessed with a demonstration of the appropriate measures to prevent emissions of odour and pests; and
- A site-specific EMS will be produced as opposed to an extension to PCC's existing ISO 14001 EMS.

1.3 EP Application Context

An EP application was previously submitted to NRW for the proposed North Powys Bulking Facility (Ref: PAN-013001) on 3rd February 2021. The application was refused by NRW on 14th March 2022.

The history of this application is summarised in Table 2 below.

Table 2 Context of EP Application

Date	Correspondence from NRW	Description	Response from SLR
3 rd February 2021	EP Application Received by NRW	NRW provided confirmation that the EP Application had been received.	No response required.
1 st March 2021	Application not duly made	NRW requested further information on the Environmental Risk Assessment, Noise Impact Assessment and the Dust and Emissions Management Plan.	SLR provided the requested information within the Not Duly Made Response Letter (Ref: 210311.416.00798.00038_Not Duly Made Response Letter) on 11 th March 2021.
11 th March 2021	Application Duly Made	NRW confirmed that the application was duly made.	No response required.
16 th July 2021	Schedule 5 Notice No 1	Further information requested on the Noise and Odour elements of the EP application.	SLR provided the requested information within the response (Ref:

¹ WASTE 28: Reducing fire risk at waste management sites

			210805.416.00798.00038_SCH5 Response Letter) on 5 th August 2021.
1 st October 2021	Schedule 5 Notice No 2	<p>Further information requested on:</p> <ul style="list-style-type: none"> ■ The Fire Prevention and Mitigation Plan; ■ The Odour Impact Assessment and Odour Management Plan; ■ The Dust and Emissions Management Plan; ■ The Noise Impact Assessment and Noise Management Plan; ■ The Operating Techniques; ■ The Pest Management Plan; ■ The Permit Boundary; ■ Technical Competence; and ■ The Waste Codes. 	The requested information was provided to NRW by SLR in the response (Ref: 211111.416.00798.00038_SCH5 Response to NRW) on 11 th November 2021.
13 th October 2021	Site Condition Report Update	NRW requested that the Site Condition Report was amended to be specific to the proposed permitted area and to include a table of the baseline data for the exploratory hole locations within the proposed permitted area.	The updated Site Condition Report (Ref: 10026414-ARC-XX-XX-RP-ZZ-0005-03) was provided to NRW on 16 th December 2021.
14 th January 2022	Request for Additional Information on Schedule 5 No 2 and Schedule 5 No 3	<p>Additional information was requested for the Schedule 5 Notice No 2 response issued 1st October 2021. Additional information was requested on the Fire Prevention and Mitigation Plan, Odour Management Plan, Dust and Emissions Management Plan, Operating Techniques, and Pest Management Plan.</p> <p>Schedule 5 No 3 requested further information on the Fire Prevention and Mitigation Plan, Odour Impact Assessment and Odour Management Plan, Accident Management Plan,</p>	The information was provided in the response (Ref: 220119.416.00798.00038_SCH5 Response Final) submitted to NRW on 31 st January 2022.

		Complaint's Procedure and Food Waste.	
14 th March 2022	NRW Refusal Notice	<p>The EP application was refused by NRW for the following reasons:</p> <ul style="list-style-type: none"> ■ NRW were not satisfied that the Fire Prevention Mitigation Plan met the requirements of the 'Fire Prevention and Mitigation Plan Guidance – Waste (Version 2 August 2017)' because: <ul style="list-style-type: none"> ○ The Fire Prevention and Mitigation Plan did not demonstrate that the PCC had permission from the relevant water supplier to use the fire hydrants; ○ Suitable evidence to demonstrate that the fire hydrants would provide the amount of water required during a fire was not provided; and ○ Evidence to demonstrate that the use of the hydrants would not impact the local water supply was not provided. ■ NRW were not satisfied that the impact on odour emissions from storing food waste for longer than 24 hours outside of normal operations was considered, however it was stated that 	These concerns have been fully addressed within the new application for an EP for the proposed North Powys Bulking Facility, a summary of which is included in Sections 1.4 and 1.5 below.

		this issue/concern was not part of the reasons why the application was refused.	
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1.4 Fire Prevention and Mitigation Plan

PCC will construct a 250,000 litre water tank at the facility, which will be the **primary source of water on site for firefighting**.

The water tank will be located in the north western area of the site, as illustrated on Drawing 002. The water tank alone will provide sufficient water to put out the largest stockpile (207m³ stockpile requires a minimum of 249,642 litres).

1.5 Odour Impact Assessment

The odour impact assessment has been updated to reflect the storage of food waste, under normal conditions, over the weekend. An odour monitoring study was undertaken on 27th April 2022 at another PCC bulking site (Rhayader Waste Transfer Station (Ref: EPR/DB390AB)), with samples sourced from the actual waste which the site will accept.

Food waste will be stored for 24 hours within the food waste bay during the week, and up to 72 hours within the food waste skip(s) over the weekend period.

The detailed approach to the modelling (with the inclusion of food waste stored within skips over the weekend) is detailed in the assessment, however the conclusions are that; **The results of the dispersion modelling predict that the odour concentrations resulting from the operation of the bulking facility are below the relevant benchmark criterion at all sensitivity receptors. Therefore, in accordance with NRW's H4 Odour Guidance there is no risk of significant pollution as a result of the bulking facility's operation.**

1.6 2022 Application

It should be noted that this updated application incorporates all comments and additions requested by NRW in the 2021 application.

In addition to this, NRW's refusal notice stated that following determination the following documents/management plans had been accepted;

- Dust and Emissions Management Plan;
- Pest Management Plan; and
- Noise Impact Assessment and Management Plan.

Fundamentally, the activities proposed at the Bulking Facility have not changed since the application was submitted in 2021. The resubmission addresses the concerns raised by NRW regarding the availability of firewater and odour emissions from the activities as detailed in the refusal notice and includes all additional information requested in the Schedule 5 Notices. The business units located along the north eastern boundary, which

are currently under construction, were not included in the previous application but have been in this resubmission, particularly within the modelling for the Odour Impact Assessment.

2.0 Proposed Activities

PCC have constructed a new facility which is proposed to be used for the bulking up of material from kerbside collections in the area, in addition to providing a depot for the Councils' waste and recycling fleet.

The new bulking facility will replace PCC's current facility at Vastre Industrial Estate, which is no longer fit for purpose, and cannot accept all material collected in the area. The new facility will also remove the reliance on third party contractors for assistance with bulking of materials.

2.1 Process Description

Proposed operations at the site will be to accept and process up to 22,500 tonnes per annum (tpa) of non-hazardous material arising from household and commercial premises collected by PCC.

The following material types will be accepted for transfer off site for further recovery or disposal:

- Paper;
- Cardboard;
- Cans;
- Plastic;
- Composite packaging;
- Residual;
- Food;
- Glass;
- Green waste;
- Street cleaning residues;
- Textiles;
- Bulky waste;
- Non-hazardous batteries;
- Waste Electrical and Electronic Equipment (WEEE); and
- Absorbent Hygiene Products (AHPs).

The EP boundary is illustrated on Drawing 004 and site layout on Drawing 002.

Vehicles will enter the facility from the B4386 and report to the weighbridge. The material will be weighed and directed to the appropriate unloading area.

The only treatment activity undertaken on site will be the bulking up of materials. There will be no pre-treatment for incineration or co-incineration. Materials received on site will

be pre-segregated at the kerbside before arrival and therefore will not require any sorting or separation.

2.2 Specific Waste Management Activities

The activities that will be carried out at the site as defined under Annex II of the Waste Framework Directive can be summarised as follows:

- **R3:** Recycling/reclamation of organic substances which are not used as solvents;
- **R4:** Recycling/reclamation of metals and metal compounds;
- **R5:** Recycling/reclamation of other inorganic materials;
- **D9:** Physico-chemical treatment not specified elsewhere which results in final compounds or mixtures which are disposed of by any of the operations numbered D1 to D12;
- **R13:** Storage of wastes pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced);
- **D14:** Repackaging prior to submission to any of the operations numbered D1 to D13; and
- **D15:** Storage pending any of the operations numbered D1 to D14.

2.3 Waste Types and Storage

The site will accept up to 22,500 tpa and a maximum of 425 tonnes will be stored on site at any one time. Storage times will vary for each material type with a maximum storage time of 5 days for the majority of material stored on site. Non-hazardous batteries and small WEEE will be stored for a maximum of 3 months.

The proposed waste list is shown in Table 2-1 below.

Table 2-1
Proposed EWC Codes

Waste Code	Description
15	WASTE PACKAGING, ABSORBENTS, WIPING CLOTHS, FILTER MATERIALS AND PROTECTIVE CLOTHING NOT OTHERWISE SPECIFIED
15 01	Packaging (including separately collected municipal packaging wastes)
15 01 01	paper and cardboard packaging
15 01 02	plastic packaging
15 01 04	metallic packaging
15 01 05	composite Packaging
15 01 06	mixed Packaging
15 01 07	glass packaging

20	MUNICIPAL WASTES (HOUSEHOLD WASTE AND SIMILAR COMMERCIAL INDUSTRIAL AND INSTITUTIONAL WASTES) INCLUDING SEPARATELY COLLECTED FRACTIONS
20 01	Separately collected fractions (except 15 01)
20 01 01	paper and cardboard
20 01 02	Glass
20 01 08	biodegradable kitchen and canteen waste
20 01 11	Textiles
20 01 34	Batteries and accumulators
20 01 36	Discarded electrical and electronic equipment other than those mentioned in 20 01 21, 20 01 23 and 20 01 35
20 01 39	Plastics
20 01 40	Metals
20 01 99	separately collected fractions of municipal waste (AHPs comprising nappies and AHPs)
20 02	Garden and park wastes (including cemetery waste)
20 02 01	biodegradable waste
20 03	Other municipal wastes
20 03 01	mixed municipal waste
20 03 03	street-cleansing residues
20 03 07	bulky waste

3.0 Application Contents

To support this application for an EP, the following documentation is submitted in addition to this NTS:

- Natural Resources Wales (NRW) Application Forms (Parts A, B2, B4 and F1)
- Drawings
- OPRA Spreadsheet (Waste Facilities);
- Site Condition Report (SCR);
- Environmental Risk Assessment (ERA);
- Operating Techniques (OT) document;
- Fire Prevention & Mitigation Plan (FP&MP);
- Noise Impact Assessment and Management Plan (NIAMP);
- Odour Impact Assessment (OIA);
- Odour Management Plan (OMP);
- Pest Management Plan (PMP); and
- Dust and Emissions Management Plan (DEMP).

3.1 Site Condition Report

A SCR has been prepared as part of this application to establish the baseline environmental conditions within the proposed permit boundary. The SCR has been prepared in accordance with NRW's SCR template².

The facility will operate with due regard to the conditions of the EP and all relevant environmental legislation to ensure that the site does not pose a significant risk to the surrounding human and natural environment.

3.2 Environmental Risk Assessment

An ERA has been produced to assess the environmental risk posed by the proposed activities on site.

Table 3-1 highlights the main potential risks on site and the associated risk assessment and/or management plan.

Table 3-1
Summary of Environmental Risk Assessment

Potential Emission Risk	Risk Assessment/Management Plan
To Water	All waste will be stored and treated on impermeable concrete surfacing with sealed construction joints and an engineered drainage system either within the bulking shed or in the bays located externally in the yard. All runoff from waste storage areas will drain to foul sewer via an interceptor permitted through the discharge consent to public sewer

² NRW SCR template. (version 3), October 2014

	(Ref: 009188V). All clean surface and roof water run off will drain to soakaway via an interceptor.
Fire	A FP&MP is included that follows NRW guidance for FP&MPs ³ and details the required mitigation and management methods to prevent a fire of combustible materials stored on site.
Noise	<p>A NIA has been produced to assess the risk of adverse impact from noise 'pollution', generated by the proposed activities, on noise-sensitive receptors in the surrounding area. A Baseline Sound Survey was conducted to determine threshold noise levels to assess against. The results have concluded that there is a very low risk of adverse impact from noise generated by the proposed activities.</p> <p>Notwithstanding the results of the NIA, a NMP is included to ensure best practice measures for the control of noise levels within the site are implemented.</p>
Odour	<p>The proposed facility will introduce a new source of odours within the local area with a potential to impact upon the amenity of existing sensitive receptors. Therefore, the OIA is provided in order to:</p> <ul style="list-style-type: none"> ■ Ascertain whether odour issues may be expected as the result of the proposed facility; ■ Provide a quantification of potential odour impact; and ■ To identify appropriate odour mitigation measures, where required, in order to prevent adverse odour impact at a range of potential sensitive receptors in proximity to the site. <p>The effect of odours from the proposed facility on the existing sensitive receptors in the area is predicted to be 'not significant'.</p> <p>Notwithstanding the results of the OIA, an OMP is included to ensure best practice measures for the control of odour emissions within the site are implemented.</p>
Pests	A PMP has been produced that outlines the methods by which PCC will systematically assess, reduce and prevent a potential infestation of pests at the proposed facility during normal operation and during potential abnormal events.
Dust	<p>A DEMP has been produced which includes a review of the site's location, potentially sensitive receptors and local wind speed and direction data. The sources of dust associated with the proposed activities on site have been considered and appropriate techniques for monitoring, management and mitigation will be in place.</p> <p>Subject to the implementation of the stated management measures, the conclusion has been reached that the proposed activities are unlikely to</p>

³ Fire Prevention & Mitigation Plan Guidance, August 2017

	result in a significant risk of dust emissions that would affect the amenity of the local environment.
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3.3 Operating Techniques

PCC will operate their own EMS which is supplemented by the OT document submitted with this application.

The OT document details the management measures that will be implemented on site to minimise the risk of accidents or emissions that could impact workers and local receptors.

The document includes the detailed process description and relevant roles and responsibilities to ensure the safe and effective management of the site to keep it in compliance with the EP.

The document includes the following information;

- Management;
- Site Operations;
- Emissions and Monitoring; and
- Information and Reporting.

Operational management procedures will ensure that:

- The risks that the activities pose to the environment are identified;
- The measures that are required to minimise the risks are identified;
- The activities are managed in accordance with the EMS and the OT;
- Performance against the EMS is audited at regular intervals; and
- The EP is complied with.

4.0 Technical Standards and Control Measures

The key technical standards laid out in the following documents govern the design and operation of the site:

- The Environmental Permitting (England and Wales) Regulations 2016 (as amended);
- Developing a management system: environmental permits and controlling and monitoring your emissions for an environmental permit;
- Sector Guidance Note S5.06 – Guidance for the Recovery and Disposal of hazardous and Non-Hazardous Waste;
- Technical Guidance Document: How to comply with your environmental permit, Version 8, October 2014;
- Fire Prevention & Mitigation Plan guidance;
- Site Condition Report template, Version 3;
- H4 Odour Management;
- H3 Horizontal Guidance for Noise; and
- Fly management: how to comply with your environmental permit, Version 1, April 2013.

The control measures relevant to the proposed activities are described in the OT submitted with this application.

The proposals have been assessed against these standards and are all considered to meet the relevant technical standards.

The overall conclusion is that there is unlikely to be a significant environmental impact as a result of the application.

PCC is fully committed to ensuring the highest standards are met and will undertake its activities in a manner consistent with best industrial practices and in accordance with their EMS.

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