

Natural Resources Wales permitting decisions

G.D. Environmental Services Limited

Decision Document

(East Bank Road Treatment Facility)

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Bespoke Permit Variation

The application permit variation number is: EPR/XP3833UB/V011.

The applicant / operator is: G.D. Environmental Services Limited.

The Installation is located at: East Bank Road Treatment Facility, Unit 18A East Bank Road, Felnex Industrial Estate, Newport, NP19 4PP.

We have decided to issue the variation notice and consolidated permit for East Bank Road Treatment Facility operated by G.D. Environmental Services Limited.

We consider in reaching that decision we have taken into account all relevant considerations and legal requirements and that the permit will ensure that the appropriate level of environmental protection is provided.

Purpose of this document

This decision document:

- explains how the application has been determined;
- provides a record of the decision-making process;
- shows how all relevant factors have been taken into account;
- justifies the specific conditions in the permit other than those in our generic permit template.

Unless the decision document specifies otherwise we have accepted the applicant's proposals.

Key issues of the decision

How we reached our decision

Application Receipt and duly making

The application was accepted as duly made on 7 April 2022. This means we considered it was in the correct form and contained sufficient information to begin our determination, but not that it necessarily contained all the information we would need to complete that determination.

Confidential information

No claims for commercial or industrial confidentiality have been made by the Operator. We have not received information in relation to the Application that appears to be confidential in relation to any party.

Consultation

There was no requirement to carry out a consultation on this application, as this is a normal variation, and the site is not registered as a Site of High Public Interest (HPI Site). The decision was taken in accordance with RGN 6 High Profile Sites, our Public Participation Statement and our Working Together Agreements.

Legislation

The variation notice and consolidated permit is issued, under Regulation 20 of the EPR. The Environmental Permitting regime is a legal vehicle which delivers most of the relevant legal requirements for activities falling within its scope. In particular, the regulated facility is an installation as described by the IED.

We address the legal requirements directly where relevant in the body of this document. NRW is satisfied that this decision is consistent with its general purpose of pursuing the sustainable management of natural resources (SMNR) in relation to

Wales and applying the principles of SMNR. In particular, NRW acknowledges that it is a principle of sustainable management to take action to prevent significant damage to ecosystems. We consider that, in granting the variation notice and consolidated permit a high level of protection will continue to be delivered for the environment and human health through the operation of the Facility in accordance with the permit conditions. NRW is satisfied that this decision is compatible with its general purpose of pursuing the sustainable management of natural resources in relation to Wales and applying the principles of sustainable management of natural resources.

A copy of the application and all other documents relevant to our determination (see below) are available for the public to view. Anyone wishing to see these documents could arrange for copies to be made.

The facility

The existing regulated facility carries out both waste storage and treatment activities:

- Storage, repackaging and bulking up of hazardous solid waste prior to its dispatch off-site for recovery or disposal.
- Storage, blending and treatment of hazardous liquid waste prior to its dispatch off-site for recovery or disposal.
- Storage, blending and dewatering of waste oil prior to its dispatch off-site for recovery or disposal.
- Storage, blending and biological treatment of non-hazardous waste prior to its dispatch off-site for recovery or disposal.

The treatment of waste oil consists of separation of oil from oil/water mixtures by gravity separation. The oil is subsequently transported to other facilities for re-refining or blending. The aqueous and solid fractions are then centrifuged, with the resultant

cake being sent for further treatment elsewhere and the aqueous portion being discharged to sewer.

The installation is permitted for the following activities:

- S5.3 A(1)(a)(iii) Disposal or recovery of hazardous waste in a facility with a capacity exceeding 10 tonnes per day involving blending or mixing prior to submission to any of the other activities listed in this Section or in Section 5.1.
- S5.3 A(1)(a)(ii) Disposal or recovery of hazardous waste in a facility with a capacity exceeding 10 tonnes per day involving physico-chemical treatment.
- S5.4 A(1) (b) (i) Recovery or a mix of recovery and disposal of non-hazardous waste with a capacity exceeding 75 tonnes per day involving biological treatment.

The site

The East Bank Road Treatment Facility is located on the Felnex Industrial Estate, near to the East bank of the River Usk, South of Newport city centre. The River Usk, a protected conservation site, is located 200 metres from the installation. The centre of the facility is located approximately at National Grid Reference ST 3252 8581.

Proposed Changes

This variation adds a standalone waste operation to the existing permitting activities. The newly proposed waste operation includes the storage and treatment of street cleaning residues containing non-hazardous plant-based materials arising from road sweeper/gulley operations. The treatment process will consist of a wash plant and mechanical sorting process to recover inert materials for use as recycled aggregate. Organic plant-based solid materials separated from the process will be stored within a skip located inside the main building, prior to removal off site.

This variation also adds the waste type (20 03 03) to the permit, for operations associated with the waste recycling operations. The throughput capacity of the waste operation will be 25,000 tonnes per annum.

The inclusion of the waste operations will increase the total throughput capacity for the whole site to 75,850 tonnes per annum.

Given that the waste operations will include storage of solid fractions of non-hazardous organic materials separated from the street cleaning residues, this additional waste stream is considered a combustible material, and is therefore captured under NRW's Fire Prevention and Mitigation Plan Guidance for Waste Management, and thus the Operator has been asked to provide a site-specific Fire Prevention and Mitigation Plan to be included within the Operators Operating Techniques.

Table S1.1 within Schedule 1 of the permit is thus amended to include the following waste activity:

Table S1.1 Activities		
	Description of activities for waste operations	Limits of activities
A4	R3: Recycling or reclamation of substances which are not used as solvents R5: Recycling or reclamation of other organic materials 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)	The maximum quantity of waste received at the site shall not exceed 100 tonnes per day. Treatment consisting of washing (physico-chemical) and manual separation (mobile plant) of non-hazardous waste into different components for recovery. All waste shall be stored and treated on an impermeable surface with sealed drainage system. The total storage capacity for non-hazardous wastes will be 60 tonnes. Waste types as specified in Table S2.5.

Waste types to be added

Although the waste type 20 03 03 is already currently listed within Table S2.4 of the permit (as a permitted waste to be processed as part of activities listed against A3 activities described within Table S1.1 of the permit), the permit restricts this waste stream as consisting of liquid fraction only.

This variation introduces an additional list of waste types (Table S2.5) which will permit the Operator to accept street cleaning residues including solid fractions onto site.

The following Table (Table S2.5 Waste Types) is to be included within Schedule 2 of the Permit.

Table S2.5 Permitted waste types and quantities for non-hazardous waste operations	
Maximum quantity	Maximum quantity permitted for storage at any time is 60 tonnes The total maximum quantity of non-hazardous waste, as defined in this table, is 25,000 tonnes per annum.
Waste code	Description
20	MUNICIPAL WASTES (HOUSEHOLD WASTE AND SIMILAR COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL WASTES) INCLUDING SEPARATELY COLLECTED FRACTIONS
20 03	Other municipal wastes
20 03 03	Street-cleaning residues

Technical Assessment

This section of the decision document considers the potential environmental impacts posed by the new activities.

The newly proposed waste operations to be added to the permit will not result in any new point source emissions to atmosphere, surface waters, sewer, land or

groundwaters. Thus there have been no changes required to Emissions and Monitoring Tables listed within Schedule 3 of the permit.

The processing operations involve physical treatment (washing) followed by mechanical separation of material using mobile plant (Gritbuster). The treatment does not use heat, nor does it result in the generation of heat. The solid organic material separated during the treatment process is screened/floated off and collected in a skip, separating it from the water and mineral residues.

The primary risks associated with the new activities relate to abnormal or emergency scenario conditions, and the potential for loss of containment and the potential risk of fire.

The combined storage capacity of the washing plant and grit buster tanks are 21.6 m³ with 1 tank for clean water 1 tank for dirty water with a clarifier holding tank 4m³ in size. The combined total storage within the tanks will be just under 48m³.

Waste is not left in the tanks overnight only water. The total waste storage capacity for wastes processed under the newly proposed waste operations will be a maximum of 60 tonnes.

Fire Prevention and Mitigation

As the solid fraction organic material, which is separated from the waste treatment operations, is considered combustible material, the waste stream is captured under NRW's Fire Prevention and Mitigation Plan Guidance for Waste Management Sites, and thus the Operator was required to submit a site-specific Fire Prevention and Mitigation Plan (FPMP) for the storage, treatment and handling of this additional waste stream.

As part of the working agreement between NRWs and Fire & Rescue Service (FRS), the site-specific FPMP was sent to the South Wales FRS Team on 21 April 2022 for their review / comment. The working agreement is that should the FRS have any

comments on the FPMP, that comments are sent back to NRW within 20 working days of receipt of the document. South Wales FRS Team acknowledged receipt of the FPMP however provided no further comments or feedback as part of this consultation.

A Schedule 5 Notice was issued to the Operator on 9 June 2022 to request additional clarifications on site drainage and primary / secondary containment to be provided to support the new treatment and storage processes.

Additional clarifications were provided, and we are satisfied that the Operators FPMP now satisfies our guidance.

Reference to the approved FPMP dated June 2022 is listed within Table S1.2 Operational Techniques in the permit.

Site Drainage and Containment

The Operator has a duty to ensure that soil and groundwater are protected. The Operator has confirmed that the newly proposed waste operations will take place within the existing permitted site boundary on impermeable surfacing, and that no additional land is required to accommodate the new process. The washing plant and grit buster treatment processes will take place within sealed container units and separated solid organic waste fractions will be stored inside the building within a skip, also on impermeable surfacing.

The solid organic material separated from washing and separation process will be stored within a skip located within the main building. The washing and separation processes will take place outside in sealed treatment container units.

The tanks are inspected daily as regards their integrity and in the event of any leakage processing would cease and suitable repairs/maintenance undertaken before recommencing operations. As per the FPMP water can be contained within the site by a combination of the raised boundary kerbing and use of drain covers. The option also exists to use the liquid tanks to pump water into if required.

The site is serviced with a combined sewer, with no direct run-off to surface water drains.

Waste Acceptance

Based upon the supporting information included within the variation application we are satisfied that appropriate operating techniques and control measures will be in place to ensure that appropriate pre-acceptance and on site waste acceptance checks will be in place to ensure that only suitable non-hazardous waste materials are brought onto site to be processed under the waste operations.

Odour

Based upon the supporting information included within the variation application we are satisfied that appropriate operating techniques and control measures will be in place to prevent or where that is not practicable to minimise odour emissions from the newly proposed waste operations.

Noise

Based upon the supporting information included within the variation application we are satisfied that appropriate operating techniques and control measures will be in place to prevent or where that is not practicable to minimise noise and/or vibration from the newly proposed waste operations.

Fugitive emissions

Based upon the supporting information the Operator has provided within their variation application, we are satisfied that the operating techniques and control measures proposed can be considered appropriate, and that these will be in place to prevent potential for fugitive emissions release.

Monitoring

As there are no additional emission points associated with the newly proposed waste operations, therefore there is no requirement for any additional point source monitoring.

Operating Techniques

We have reviewed the techniques to be used by the Operator and compared these with the relevant guidance notes. We consider that the Operators proposed techniques represent appropriate techniques and control measures for the newly proposed waste activities.

Environment management system

Updated and new Operational Techniques documentation specific to the newly proposed waste operations submitted with this variation application (as listed within Table 1.2 of the permit), are to be incorporated into the Operators existing Environmental Management system for the permitted site.

Technical competence

Technical competency is required for the newly proposed waste operations. The Operator has provided evidence of continued technical competency to an approved scheme and has thus demonstrated technical competency.

OPRA

There are no changes to the Opra score for the site, as a result of this variation. The OPRA score at permit issue remains 82 however due to the addition of a waste activity, an additional charging component has been added (T1A/c/ii).