APPLICATION FOR AN ENVIRONMENTAL PERMIT UNDER THE ENVIRONMENTAL PERMITTING (ENGLAND AND WALES) REGULATIONS 2016 (AS AMENDED)

NON TECHNICAL SUMMARY

PLATTS AGRICULTURE LIMITED,
MINERS PARK, LLAY INDUSTRIAL ESTATE,
LLAY, WREXHAM

ECL Ref: PLAT.01.02/NTS
Version: Issue 2
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TABLE OF CONTENTS

LIST OF TABLES

ACRONYMS/TERMS USED IN THIS REPORT

BAT	**Best Available Techniques**
BREF	**Best Available Techniques Reference Document**
CCTV	**Closed Circuit Television**
DMP	**Dust Management Plan**
EA	**Environment Agency**
ECL	**Environmental Compliance Limited**
EMS	**Environmental Management System**
EP Regulations	**Environmental Permitting (England and Wales) Regulations 2016 as amended**
EP	**Environmental Permit**
EP	**Environmental Permit**
ERA	**Environmental Risk Assessment**
FPP	**Fire Prevention Plan**
Ha	**Hectares**
IBC	**Intermediate Bulk Container**
IBC	**Intermediate Bulk Container**
NGR	**National Grid Reference**
NIA	**Noise Impact Assessment**
NRW	**Natural Resources Wales**
NSR	**Nearest Sensitive Receptors**
OS	**Ordnance Survey**
Platts	**Platts Agriculture Limited**
PPMR	**Planned Preventative Maintenance Regime**
SCR	**Site Condition Report**
The Facility	**Platts Agriculture Waste Wood Processing Facility**
WAMITAB	**Waste Management Industry Training and Advisory Board**

DOCUMENT CONTROL

Date	Version	Section	Description	Prepared by	Approved by
Jan 22	Issue 1	All	All	ECL	CW/BMK
June 23	Issue 2	1	Introduction	ECL	AF/CW
		2	Proposed Activities		
		3	Technical Competence		
		4	Operating Techniques		
		5	Emissions		
		7	Application Site Condition Report		

1. INTRODUCTION

1.1. Environmental Compliance Limited ("ECL") has been commissioned by Platts Agriculture Limited ("Platts") to produce a bespoke waste operation Environmental Permit ("EP") application for a wood waste processing facility, hereafter referred to as "the Facility" located in Llay Industrial Estate, Llay, Wrexham, LL12 0PJ.

1.2. Platts is proposing the operation of a bespoke waste Facility accepting 60,000 tonnes per annum of non-hazardous wood waste to manufacture animal bedding and cubicle conditioner for use within the agricultural livestock sector.

1.3. The Facility is located at Miners Park within Llay Industrial Estate and is centred on Ordinance Survey ("OS") National Grid Reference ("NGR") 332077 356370. The Facility will occupy an area of approximately 1.56 Hectares ("Ha").

1.4. The exact location of the Facility and the proposed Environmental Permit Boundary (outlined in green) is indicated on the Site Location Plan (Drawing PLAT.01.02-01), which is contained in Section 3 of this application submission.

1.5. Platts was formed in 1973 and is a market leading UK manufacturer and supplier of quality animal bedding and cubicle conditioner. Platts was awarded the Royal Warrant in 2018 as a mark of recognition for the supply of goods to Her Majesty the Queen.

1.6. Certain ambiguity within the regulations and cross referencing in the PAS 111 guidance meant Platts believed they were operating within the requirements of the legislation. Recent discussions, however, have highlighted that Platts require an EP for their activities and therefore, this Permit application has been prepared.

2. PROPOSED ACTIVITIES

2.1. Platts propose to undertake one Specified Waste Operation as follows:

- storage of non-hazardous waste wood (classification 03 01 05) with subsequent treatment involving magnetic separation, screening, pulverising and baling to produce animal bedding material (including cubicle conditioner) for use within the agricultural livestock sector.

2.2. The waste management operations to be carried out at the Facility as specified in Annex I and Annex II of the Waste Framework Directive 2008 are detailed below:

- **R3**: Recycling/reclamation of organic substances which are not used as solvents (including composting and other biological transformation processes); and
- **R13**: Storage pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced).

2.3. The proposed waste code to be accepted at the Facility is provided in Table 1 below.

Table 1: Proposed Waste Code to be Accepted

Code	Description
03	**WASTES FROM WOOD PROCESSING AND THE PRODUCTION OF PANELS AND FURNITURE, PULP, PAPER AND CARDBOARD**
03 01	Wastes from wood processing and the production of panels and furniture
03 01 05	Sawdust, shavings, cuttings, wood, particle board and veneer other than those mentioned in 03 01 0 4

2.4. Following wood waste treatment at the Facility, it is considered that the processed material should thereafter be classified as a 'product' and no longer considered a waste. The results of the analysis to date and interpretation against PAS 111 and other industry standards are presented in the Wood Waste Review (PLAT.01.02/WWR) submitted in Section 10 of this application submission.

2.5. Furthermore, in response to Schedule 5 Notice I (dated 19/07/2022), an End of Waste Justification document (PLAT.01.02/EoW) was submitted to NRW to demonstrate End of Waste classification for the processed wood waste. The Justification document has been supported with an Addendum document (PLAT.01.02EoW (Addendum) ISSUE 1) that clarifies the steps that have been taken to meet end of waste and the various assessments against other materials to compare contaminant concentration levels that prove the material cubicle conditioner (animal bedding) is not harmful to animals, human health, or the environment, and meets the requirements of 'harmonised end of waste test. Please refer to these documents for more detail.

3. MANAGEMENT TECHNIQUES

3.1.1. Under the Environmental Permitting (England and Wales) Regulations 2016 (as amended), the activities at the Facility are classified as a relevant waste operation, and, accordingly, a Technically Competent Manager will be required. Caroline Platt, Paul Williams and Alison Fuller will fulfil this requirement. Caroline Platt and Alison Fuller's Waste Management Industry Training and Advisory Board ("WAMITAB") Learner ID for the WAMITAB Level 4 Medium Risk Operator Competence for Non-hazardous Waste Treatment and Transfer (601/828/4) (MROC1) is provided within Section 1 of the application submission.

3.1.2. Paul Williams has completed WAMITAB Level 4 Medium Risk Operator Competence for Non-hazardous Waste Treatment and Transfer (601/828/4) (MROC1). Evidence of competence for Paul Williams is not available in certificate form due to the qualification being earned as an additional unit. Evidence of competence is however available on the WAMITAB database. Paul Williams learner ID (1969) is provided in Section 1 of this application. It is understood that NRW has access to the WAMITAB database to view registrations and associated units.

3.2. Platts will operate their own in-house Environmental Management System ("EMS") at the Facility which addresses environmental aspects of the proposed activities. The EMS will be written in accordance with Natural Resources Wales ("NRW") guidance and associated toolkit and will adopt the Plan, Do, Check, Act approach.

4. OPERATING TECHNIQUES

4.1. Overview

4.1.1. The main purpose of the Facility will be waste storage and processing operations accepting and storing waste wood prior to processing to generate animal bedding (including cubicle conditioner) for the agricultural livestock sector.

4.1.2. Platts propose to undertake one Specified Waste Operation as follows:

- storage of non-hazardous waste wood (classification 03 01 05) with subsequent treatment involving magnetic separation, screening, pulverising and baling to produce animal bedding material (including cubicle conditioner) for use within the agricultural livestock sector.

4.1.3. Platts is proposing to accept waste wood which is both 'treated' with veneers, glues, varnishes and stains, and 'clean', virgin timber, timber from the arboriculture sector, packing waste, kiln dried scrap pallets, and off cuts from the manufacture of untreated wood products.

4.1.4. Waste categorisation and associated dedicated storage arrangements on site and waste processing are crucial as Platts produce the two distinct products of animal bedding, originating from the clean waste wood, and cubicle conditioner (animal bedding), originating from the treated waste wood.

4.1.5. Platts will ensure the two incoming waste streams will not be mixed.

4.2. Pre-Acceptance and Acceptance Procedures

4.2.1. Platts has put in place fully documented waste pre-acceptance procedures, the purpose of which will be to ensure that wastes are subject to appropriate technical appraisal prior to acceptance at the Facility. In turn, this will ensure that unsuitable wastes are not accepted. These checks will be carried out before any decision is made to accept a waste.

4.2.2. For each supplier of waste wood to Platts, regular sampling will be undertaken assessing a range of substances which may be present in the waste wood streams. The sampling will ensure that substance concentrations are sufficiently low so as not to pose a risk to the environment, human health, or animal welfare.

4.2.3. Records relating to pre-acceptance at the Facility will be kept for a maximum of five years within the Facility office building. Backup copies will be maintained off site at Platts' Head Office on Miners Road within Llay Industrial Estate.

4.2.4. Platts has put in place fully documented incoming waste acceptance procedures, the primary purpose of which is confirm that the characteristics of the incoming waste matches the information provided at the pre-acceptance stage.

4.2.5. Platts has developed a procedure containing clear criteria for the rejection of wastes, together with a written procedure for tracking and reporting such non-conformance.

4.2.6. Any non-conforming waste observed will be removed off site and sent back to the supplier as soon as practically possible, however, such waste will only be stored in the Non-Conforming Waste Quarantine Area for a maximum of 5 working days. The supplier will be contacted without delay to inform them of the non-conforming waste and identify measures that can be implemented to prevent recurrence. Natural Resources Wales ("NRW") will also be informed as soon as practicable in the event of waste being rejected.

4.3. Waste Handling, Storage, Processing and Dispatch

4.3.1. On arrival into site, trailers will be required to report to the weighbridge office. Following weighing, trailers will be directed to the relevant storage area which will be clearly marked.

4.3.2. All storage areas are within the secured perimeter covered by security fencing and Closed-Circuit Television ("CCTV").

4.3.3. Trailers will be issued a unique reference number enabling the waste to be tracked across the site. The tracking system will also further prevent clean and treated wood waste stream from becoming mixed.

4.3.4. All waste received at the Facility will be treated on a first in first out basis and will be stored for a maximum of 1 month, however, the intention is to process the material within five working days.

4.3.5. The majority of finished packaged materials will be transported from the Facility in enclosed trailers and all waste materials will be weighed prior to their removal from the site. This will be achieved by the vehicles being weighed prior to loading and then prior to departure carrying such waste materials over the weighbridge.

4.4. Records

4.4.1.1. A waste tracking system will be implemented which will hold all the information generated during the pre-acceptance, acceptance, storage, processing, and removal of finished product off site.

4.4.1.2. Records will be kept up to date on an ongoing basis to reflect deliveries, on-site processing, and dispatches. The tracking system will operate as a waste inventory control system.

4.4.1.3. The reporting system can provide information on the following:

- the total quantity of waste present on site at any one time;
- a breakdown of the waste quantities being stored pending on-site treatment, classified by treatment route;
- breakdown of waste quantities on site for storage pending onward transfer;
- breakdown of waste quantities by hazard classification;
- the physical locations of the waste and finished product in relation to the site layout plan. This will include a record of any movements to different locations on site, however, this would not be normal practice;
- a comparison of the quantity of waste stored on site against the total permitted to be stored; and
- a comparison of the time the waste has been stored on site against the permitted limit.

4.4.1.4. All records are held in hard copy and electronically within the office building located away from waste storage areas. A backup copy is maintained and stored off site at Platts' Head Office on Miners Road within Llay Industrial Estate. All digital records will be held for a maximum of 5 years.

4.5. Proposed Infrastructure and Drainage Arrangements

4.5.1. The Facility process and storage areas benefit from concrete hardstanding. The Facility is located within a secure compound, completely enclosed by metal palisade fencing and lockable entrance gates which are locked out of hours.

4.5.2. Platts propose to operate 24/7 excluding bank holidays and shutdowns. The Facility will therefore be manned during normal operations. Platts hold a contract with a specialist security company who maintain the site's CCTV surveillance.

4.5.3. Rainwater runoff from the building guttering, downpipes and external yard surface runoff will be channelled to the foul water drainage network as shown on the Drainage Plan.

4.5.4. An emergency spill procedure will be implemented to respond to any spillages. This procedure will be contained within the Facility's EMS.

4.5.5. Platts will implement a regime of visual site condition checks to be undertaken weekly to ensure that the infrastructure is maintained in good condition. The results of these checks and details of any remedial action and maintenance that may be required in order to ensure good condition are recorded in the site office.

5. EMISSIONS

5.1. There will be no point source emissions to air.

5.2. There are a number of potential sources of dust emissions from the proposed activities including unloading of waste wood, processing activities, loading and dispatch of finished product. In order to effectively control these potential fugitive emissions and to prevent dust nuisance form being experienced, a Dust Management Plan ("DMP") (Document Reference PLAT.01.02/DMP) has been prepared and is contained within Section 9 of this application submission.

5.3. There will be no point source emissions to land or surface water. As all operations, including the storage of unprocessed and process wood waste, unloading, processing and handling takes place in areas sealed with an impervious barrier, the risk of fugitive emissions is considered to be low.

5.4. In addition to the effluent from the site's welfare facilities and clean rainwater from site surfacing, the Facility holds a Letter of Authorisation/Trade Effluent Consent issued by Welsh Water. The Consent provides authorisation to discharge trade effluent from vehicle washing into the public foul sewer via a silt/oil interceptor. This emission point is designated as S1. As all conditions of the Consent will be adhered to, the risk of contamination to foul sewer and subsequent controlled waters is considered to be low.

5.5. Plant, equipment and Platts' trailers will be subject to regular maintenance and servicing. This will ensure they are in good working to reduce the likelihood of fuel leakage or spillage of waste from the trailers at the Facility.

5.6. Regular site inspections will be undertaken to observe any spillages and to guarantee the continued integrity of trailers used for storage and impermeable concrete surfacing. If remedial action is required, this will be undertaken immediately.

5.7. Two potentially polluting substances will be held at the Facility; 1,000l of vehicle detergent stored in an intermediate bulk container ("IBC") on a bund, and 2,500l of diesel stored in an integrally bunded tank. All potentially polluting substances will benefit from bunding which is able to contain 110% of the volume of the largest container within the bund. The IBC, tank and bunding will be subject to daily visual inspection to ensure their continued integrity. Any spillages at the Facility will be subject to the Facility's robust EMS which will contain a spill management procedure. This will prevent any potentially polluting material from entering the Facility's drainage network.

6. GENERAL REQUIREMENTS

6.1. The Environmental Risk Assessment ("ERA") (Document Reference PLAT.01.02/ERA) submitted as part of this application submission has demonstrated that emissions of substances not controlled by emission limits (i.e. fugitive dust emissions) require additional measures to effectively control their emissions and prevent dust nuisance from being experienced by sensitive receptors. A Dust Management Plan (Document Reference PLAT.01.02/DMP) has therefore been prepared and submitted as part of this application.

6.2. Platts are not proposing to accept any waste which is likely to be odorous in nature. Consequently, an Odour Management Plan is not required as part of this application.

6.3. The Facility is located in a predominantly industrial setting within Llay Industrial Estate surrounded by numerous industrial and commercial units. However, as the proposed activities have the potential to cause noise nuisance, a Noise Impact Assessment ("NIA") has been undertaken (PLAT.01.02/NIA).

6.4. The NIA concluded that the noise generating activities were unlikely to have any adverse impact on the nearest sensitive receptor ("NSR") locations. Further calculations of the sound pressure level attenuation with distance determined that the contribution from on-site noise generating activities was below the background noise levels at the NSR locations and would not affect the ambient noise levels at these locations. Therefore, the noise generating activities at the Facility can be considered insignificant as long as there are no changes in the ambient noise levels at the NSR locations. However, as requested by NRW and to demonstrate Platts' commitment to robust environmental management at the Facility to control noise, a Noise Management Plan (PLAT.01.02/NMP) has been prepared and is contained in Section 11 of this application, together with the NIA.

6.5. Due to the nature of waste to be accepted, the risk of the attraction of pests, such as rodents and flies, is deemed not to be significant as detailed in the ERA. Consequently, a Pest Management Plan is not required as part of this application.

6.6. As per the requirements of NRW's '*Fire Prevention and Mitigation Plan Guidance – Waste Management*' (Version 2.0, August 2017), a Fire Prevention Plan ("FPP") is required for Operators that store any amount of combustible waste material listed within the guidance. As such, a Fire Prevention Plan (Document Reference PLAT.01.02/FPP) has been prepared and is contained within Section 8 of this application submission.

6.7. At the request of NRW, an Ecological Appraisal of the site and surrounding area has been undertaken. The report determined that the site itself is of low ecological value and that operations carried out at the Facility are unlikely to result in any direct adverse impacts on any protected/notable species. The full report (Preliminary Desktop Ecological Appraisal) is contained within Section 12 of this application.

7. APPLICATION SITE CONDITION REPORT

7.1. A Site Condition Report ("SCR") has been prepared to form part of the Environmental Permit application. The SCR (Document Reference PLAT.01.02/SCR) is contained within Section 4 of this application submission.

7.2. The aim of the SCR is to describe the condition of the land at the Facility and, in particular, to identify any substance in, on, or under the land that may present a pollution risk.

7.3. The SCR, therefore, sets out the initial (i.e., current) condition of the site and takes into account any pollution incidents that may have occurred at the site and details of any measures put into place to mitigate the effects of any such incidents. It serves two main purposes:

- firstly, it will act as a reference point, along with operating records, for measuring any deterioration of the site whilst operating under the permit (on surrender of the permit, another site report must be prepared, identifying any changes to the condition of the site from that described in the original report); and
- secondly, the SCR will give information on the physical attributes and vulnerability of the site; it will assist in understanding the environmental setting of the site, and understanding the nature, extent and behaviour of any contaminants that may be present; local hydrology, hydrogeology, geology, and general setting are taken into account.

7.4. The desk study as part of the SCR indicated that historically, land usage at the Facility included a major railway intersection serving Llay Main Colliery. This may be a potential source of contamination, both from sources associated with the railway itself, and materials transported from the Colliery.

7.5. Following the development of Llay Industrial Estate in 2001, Platts have operated on the site and there have been no pollution incidents during this time.

7.6. A walkover survey was conducted on site in order to determine the current condition of the site, in particular to identify evidence of potential contamination in the area. During the site walkover survey, no visual or olfactory evidence of contamination was observed.

7.7. An intrusive site investigation has been undertaken. The intrusive site investigation data confirms the current site condition and establishes Permit baseline conditions.

8. MONITORING

8.1. There are no point source (i.e. process contributions) emissions to air proposed as part of this application. Consequently, no monitoring is proposed.

8.2. Fugitive releases to the groundwater will be prevented by conducting all operations, including the unloading of deliveries, storage of waste materials, processing and handling in areas sealed with an impervious barrier to prevent a pathway for migration to ground or groundwater. Consequently, no monitoring is proposed.

8.3. There will be no point source (i.e., process contribution) to surface water. Clean surface water runoff (rainwater) will be discharged to the foul sewer drainage network. Therefore, no monitoring of surface water is proposed.

8.4. The Facility is subject to a Trade Effluent Consent which provides authorisation to discharge trade effluent from vehicle washing into the public foul sewer. As a result of the risk management measures outlined in the ERA and Platts strict adherence to the conditions of the Consent, no monitoring of foul water is proposed.

9. RESOURCE EFFICIENCY AND CLIMATE CHANGE

9.1. Energy Consumption and Efficiency

9.1.1. A number of energy efficiency measures will be implemented at the Facility, such as ensuring regularly inspection and maintenance of equipment and plant to achieve optimum efficiency, optimising start-up time, power down time and equipment sequencing and training all employees in the importance of energy management and energy saving practices.

9.1.2. Energy use will be monitored monthly to produce an energy balance record and any opportunities for energy efficiency improvement will be addressed as part of the EMS.

9.1.3. It is estimated that 1,500 MWh per annum of electricity will be consumed for general power on site, such as lighting, for the operation of equipment and for use within the main process building and office.

9.2. Raw Material Justification

9.2.1. The only raw materials associated with the proposed activity are the wood waste itself, diesel, and vehicle detergent. The Facility's EMS will include a procedure for the annual review of new developments in raw materials and for the implementation of any suitable ones with an improved environmental profile.

9.3. Waste Minimisation

9.3.1. The proposed activities to be undertaken are based on the application of the waste hierarchy and in particular, waste avoidance. All waste materials will be delivered to the Facility with the aim of recovery to produce a product.

9.3.2. The production of cubicle conditioner (animal bedding) for use in livestock cubicles fitted with rubber mats/mattresses as opposed to other bedding material (e.g., straw and virgin sawdust) has a number of benefits including, improving animal welfare, improving air quality in cubicles, and waste minimisation. As the cubicle conditioner (animal bedding) is highly absorbent, only a small amount is required (one cup per mat/mattress), consequently it is more energy efficient to transport than other animal bedding materials. Alternative bedding material is also required to be changed more frequently as its greater moisture content increases the likelihood of bedding fermentation, requiring the bedding to be changed and hence producing more waste.

10. COMPLIANCE WITH BAT CONCLUSIONS

10.1. The BAT Requirements for the proposed Facility have been taken from the Best Available Techniques Reference Document ("BREF") for Waste Treatment (October 2018) and the Environment Agency ("EA") IPPC S5.06 'Recovery and disposal of hazardous and non-hazardous waste' (Issue 5, May 2013).

10.2. It is considered that the techniques that will be in use at the proposed Facility will constitute Best Available Techniques ("BAT") and will be appropriate and proportionate for the scale of the activities at the Facility and the risks that are posed to the environment by these activities.