

# MPP2: Application for deployment of mobile plant for land and/or groundwater remediation or treatment using a mobile plant

## About your permit

Permit under which this deployment is taking place

Please specify the type of permit and the permit number (EPR number) that you will operate under. If you have more than one permit, you will need to specify which set of conditions to use to make our determination. Note: you can only select one permit type.

SR2008 No27 Mobile plant for the treatment of soils and contaminated material, substances or products.

**Permit number:**  
EPRBB3308HG

### Name and address of permit holder (operator)

**Name** Redstart Northwest Limited  
**Address** unit 6 , oak green business park  
Earl Road, Cheadle Hulme  
Cheadle  
**Postcode** SK8 6QL

### Who can we talk to regarding this deployment application?

**Name of contact** Phil Sales  
**Organisation** Redstart Northwest Limited  
**Address** unit 6 , oak green business park  
Earl Road, Cheadle Hulme  
Cheadle  
**Postcode** SK8 6QL  
**Phone number** 01612601333  
**Email** phil.sales@redstartnw.com

## Deployment details

Have we been consulted on your Conceptual Site Model/Risk Assessment/Remediation Strategy?

Yes

**If yes, please provide your reference number and the name of the officer who was consulted**

PAN-024179 - Previous Permit Application for the site.

Louise Bailey and (Permitting Officer - Permitting Service - NRW)

Huw Davies (Permitting Team Leader - Waste - NRW)

Enquires about use of the CL:ARIE Definition of Waste Code of Practice:

Ffion Muscroft (Public Protection Officer - Cyngor Gwynedd Council

Sarah Walton (Waste Regulation Officer - NRW)

Have there been any changes to your proposal since its consultation?

Please note: if your proposal has changed, this may require further assessment and may extend the determination time.

Yes

If you have not received any planning or pre-application advice, would you like this application to be assessed without having remediation targets pre-agreed by us?

Please note it is your responsibility to ensure remediation has been completed to a satisfactory state.

Yes

Have you had any other pre-application advice from us?

Yes

**If yes, please provide a reference number**

PAN-024179 - Previous Permit Application for the site.

## About the site

Site name and address

**Site name** Hafan y Mor Holiday Park

**Address** Pwllheli

Gynedd

North Wales

**Postcode** LL53 6HX

**12 digit grid reference** SH 43726 36876

Is your site located within the boundary of another Environmental Permit?

No

Please provide a site plan and ensure the site plan includes all items in the following question.

- File: 708.00.01 - Site Treatment Plan.pdf - [Download](#)
- File: 708.00.01a - Site Works Methodology Plans.pdf - [Download](#)

Please tick to confirm your site plan contains the following:

Operating boundary

Security and access arrangements

Areas of waste soils and contaminated material, substances or products for remediation by the mobile plant

Location/siting of principal plant and equipment

Process, treatment, storage, and quarantine areas

Drainage systems

Location of boundary monitoring points and pollution control units

Potential receptors (i.e. housing, watercourses etc.)

Protected sites (if applicable i.e. SAC, SPA, Ramsar or SSSI within 1km)

## Waste types and quantities

Specify the waste types, quantities, contaminants, and European Waste Catalogue (EWC) code for each waste to be treated on site. Also, provide the treatment technologies to be used for each waste.

	What material are you treating?	Quantity (m <sup>3</sup> )	Contaminants to be treated	Six digit EWC code	What treatment technology will you be using?
1	soil and stones other than those mentioned in 17 05 03	6000	N/A	17-05-04	Physical, chemical and biological methods of treating the source are not suitable for Asbestos and so only "civil engineering methods" of breaking the pathway are considered suitable remediation options for Asbestos within soils.
2	soil and stones containing hazardous substances	1	Cement and 2 nr similar size pieces of Vinyl Floor Tile which were all confirmed as Asbestos Containing Materials (ACM) when tested by i2 Analytical a UKAS accredited testing laboratory.	17-06-05*	Physical, chemical and biological methods of treating the source are not suitable for Asbestos and so only "civil engineering methods" of breaking the pathway are considered suitable remediation options for Asbestos within soils.
3	-	-	-	-	-
4	-	-	-	-	-
5	-	-	-	-	-

## Specified activities to be carried out on site

Please supply details of how the specified technology is suitable for treatment

Physical, chemical and biological methods of treating the source are not suitable for Asbestos and so only "civil engineering methods" of breaking the pathway are considered suitable remediation options for Asbestos within soils.

Given the proposed end use, the dispersed nature of the ACM pieces and lack of dispersed fibres within the soil matrix a controlled "litter pick" followed by placement under a cover system is considered to be the only practical method of remediation.

The proposed works will be Non-Licensed which means that the works do not need to be carried out by a Licensed Asbestos Contractor although Asbestos Awareness and Non-Licensed Work training of site operatives will be required as appropriate. It has been decided to employ a licenced contractor to advise and supervise during the work due to their additional expertise in these matters.

Provide details how residual materials/waste which cannot be treated by the specified technology are to be handled at the site

Any identifiable pieces of Asbestos Containing Materials will be picked and placed in suitable containers prior to disposal at suitably licenced facility under full duty of care for Hazardous Waste.

When Asbestos Containing Material are encountered on site, the following procedures will be undertaken:-

Lockable Asbestos designated skips should be delivered to site and be in good condition (no holes to the atmosphere, ground etc.);

Skips will be stored on an area of hard-standing or on a suitably prepared area;

Appropriate signage and warnings should be displayed on the skips along with fencing to prevent unauthorised access to the waste storage area;

The waste storage area should be lined with an impermeable liner and placed away from any surface drainage/sensitive water bodies;

All skips will be have lockable secure covers and will remain locked at all times when not in direct use;

All asbestos waste collected must be properly packaged in UN certified packaging (usually double bagged in red inner and clear outer polythene bags that are tested and certified) and properly consigned as specified in ADR/CDG. Any items placed in packaging marked and labelled as UN Class 9, UN2212 or UN2590 have been consigned as dangerous for carriage and must comply fully with the applicable carriage regulations;

Bagged asbestos waste will be stored securely in the locked asbestos skips prior to removal from site by a licenced asbestos carrier and to certified licenced disposal facility under hazardous waste duty of care paperwork;

All used disposable PPE and RPE will be included as hazardous asbestos waste;

Any suspect ACM samples taken for chemical laboratory analysis will be treated as Asbestos until proved otherwise.

No residual materials expected, contingency arrangements included in section 5.1 of 708.00.02 Hafan y Môr Holiday Park Stockpile Recovery Plan

Specify the maximum capacities of quarantine facilities to be used for the storage of contaminated materials destined for re-testing, re-processing or off-site disposal.

(Indicate the locations of such quarantine facilities on the site plan)

Nonexpected, all picked asbestos containing materials are to be securely stored in lockable skip prior to disposal, quarantine facilities can be constructed up to the volume of the material requiring treatment (5,000m<sup>3</sup>)

Mitigation of Risk from Soils with Asbestos Inclusions and monitoring requirements detailed in Section 4.2 of 708.00.02 Hafan y Môr Holiday Park Stockpile Recovery Plan.

Validation Sampling protocol detailed in section 3.4 this determines if materials require further treatment prior to re-use.

Quarantine stockpiles are not considered to be required.

Site working Plans are included as Document Ref: 708.00.01a Site Works Methodology Plans and 708.00.01 - Site Treatment Plan

Alternatively, upload a copy of this below

- File: 708.00.02 - Hafan y Môr Holiday Park - Stockpile Recovery Plan Final.pdf - [Download](#)

## Activities involving the import of waste

Will your activity involve the import of wastes?

No

Does the site form part of a Cluster project?

No

Please supply details of the procedures to be adopted at the site to ensure that only those materials that are treatable with the specified technology will be accepted.

There is only one stockpile which requires treatment. The stockpile contains one contaminant. The procedures for treatment are those specified by the recovery plan. Further information is included on the following documents:

708.00.01a - Site Works Methodology Plans  
708.00.02 - Hafan y Môr Holiday Park - Stockpile Recovery Plan Final  
708.00.08 - MS001 - Stockpile Recovery Plan  
708.00.09 - RA's Hafan Holiday Park  
708.00.10 - COSHH Forms- Hafan

Alternatively, upload a copy of this below

- File: 708.00.02 - Hafan y Môr Holiday Park - Stockpile Recovery Plan Final.pdf - [Download](#)
- File: 708.00.08 - MS001 - Stockpile Recovery Plan.pdf - [Download](#)

## Duration of this deployment

How long do you need this deployment for?

12 months or less

## Management supervision

Technically competent manager

This is the person who will be responsible for compliance with the permit for this deployment. See the guidance notes for further details.

<b>Title</b>	Mr
<b>First name</b>	Phil
<b>Last name</b>	Sales
<b>Telephone - mobile</b>	07384254945
<b>Telephone - office</b>	01612601333
<b>Email address</b>	phil.sales@redstartnw.com

### Nominated competent person

Provide details of the NCP who will be the main contact for the deployment and who will report to the TCM. See the guidance notes for further details.

<b>Title</b>	Mr
<b>First name</b>	Richard
<b>Last name</b>	Horrocks
<b>Telephone - mobile</b>	07393013355
<b>Telephone - office</b>	01612601333
<b>Email address</b>	Richard.Horrocks@redstartnw.com

Provide information on the site supervision plan for your technically competent manager. Specify what treatment methods can be operated unsupervised, and provide a justification why this should be the case.

(See 'How to comply with your environmental permit' guidance document for more information)

TCM will attend site at project start and then weekly. NCP will be on site full time during the works. no treatment will be undertaken unsupervised.

## Conceptual site model and risk assessment

Alternatively, upload a copy of this below

- File: 708.00.05 -SR2008-No27- Risk Assessment.pdf - [Download](#)
- File: 708.00.01 - Site Treatment Plan.pdf - [Download](#)

## Pollution control

Alternatively, upload a copy of this below

- File: 708.00.05 -SR2008-No27- Risk Assessment.pdf - [Download](#)
- File: 708.00.01a - Site Works Methodology Plans.pdf - [Download](#)
- File: 708.00.08 - MS001 - Stockpile Recovery Plan.pdf - [Download](#)

## Emission monitoring plans

Provide a site specific monitoring plan for any emissions that may be generated by the proposed treatment activities. Monitoring plans must include information on all of the following (when applicable to your process)

Please tick any of the below which are applicable to your process:

Air emissions

Specify the indicator parameters you propose to use for each of the emissions being monitored and provide a justification on why they are the most appropriate parameters to detect impact and prevent pollution. Depending upon your technology the plan should include both point source and wider (fugitive) emissions monitoring.

(Further information is available in the guidance)

The only monitoring that will be required during the works is background re-assurance for Airborne Asbestos fibres. Dust or excessive noise is not expected to be generated during the works.

The works site is located in an environment adjacent to a railway and affected by coastal noise (wind & sea) on most days. The plant intended for use at the site is not noisy and the tasks being undertaken are not noisy. The initial work will require preparation of a 'receiving excavation' that will generate spoil. This work will be of short duration and once complete, the excavated spoil will act as noise attenuation buffers.

The second activity will be the soil placement works which will be conducted in the base of an excavation which will be afforded further protection against potential noise migration by location at the base of the excavation. The holiday park is not expected to be open at the time of the works and therefore the occupants are not considered to be a receptor. The park is due to open again on the 8th March and we and our client were aiming to have the works complete prior to opening.

The beach is not considered a receptor although visitors to the beach could be assessed as such. Redstart has assessed prevailing wind direction being from the west and typical beach noise (sound pressure level generated from waves on a beach have been recorded at 60 dB at 0.4 m wave height to 78 dB at 2.0 m wave height) and determined exposure to beach visitors from construction noise or potential wind blown dust as negligible.

Contaminants with the potential to impact upon surface or groundwater have not been identified at the site. In line with the requirements of Land Contamination: Risk Management (LCRM) A contaminant linkage must be present for there to be a Contaminant Source – Pathway – Receptor (C-P-R) relationship. Without a contaminant linkage, there is not a risk - even if a contaminant is present. If there is no contaminant source there is no contaminant linkage and therefore no risk. With regards to surface or groundwater there is no source of mobile or dissolvable contamination or viable pathway leaving only a potential receptor. Redstart has complied with the required approach.

The risk assessment has identified that the works involving ACMs would be Sporadic and Low Intensity (SALI) and the control limit, as set out in the Control of Asbestos Regulations (CAR 2012), is not expected to be exceeded. As a result the proposed works have been classified as Non Notifiable Non Licensed works.

The control limit is set out in CAR 2012 as the concentration of asbestos in the atmosphere not exceeding 0.1 fibres per cubic centimetre (0.1f/cm<sup>3</sup>) or 0.1f/ml airborne fibres averaged over a four-hour period.

A detailed Risk Assessment has been carried out with regards to the potential risks posed by the generation of airborne Asbestos fibres as a result of the works. As discussed in 708.00.05 -SR2008-No27- Risk Assessment, using the worst-case concentration of Asbestos fibres identified during the investigation works of 20mg/kg there is a potential for airborne Asbestos fibre release during disturbance of the soil at a concentration of approximately 0.00007f/ml (70fibres/m<sup>3</sup>). This is several orders of magnitude below the Control limit.

As a precaution, it is recommended that during the picking and excavation works air monitoring is undertaken. The monitoring is required to monitor exposure levels and ensure that 'control limits' are not being exceeded.

The monitoring will be carried out in accordance with the requirements of HSG 248. The monitoring will be carried out by a suitably qualified person from a UKAS accredited laboratory. Background re-assurance asbestos fibre air monitoring will be carried out at strategic locations (i.e. downwind of excavation activities and adjacent to any potential receptor boundaries as detailed on 708.00.01 Site Treatment Plan). Personal monitoring will also be carried out on operatives undertaking the works.

The results of the monitoring will be made available to the contractor on the same day to demonstrate the deployment of the required control procedures and safe working methods are sufficient and the control limit or SALI limits aren't being exceeded.



Alternatively, upload a copy of this below

- File: 708.00.01 - Site Treatment Plan.pdf - [Download](#)
- File: 708.00.08 - MS001 - Stockpile Recovery Plan.pdf - [Download](#)
- File: 708.00.05 -SR2008-No27- Risk Assessment.pdf - [Download](#)

## Record Keeping - Commissioning, operating and maintenance

Provide details of commissioning, operating and maintenance including documentation and record-keeping to ensure that emissions from the process do not cause pollution of the environment and harm to human health.

Redstart site management will keep all records of plant deliveries, background re-assurance air monitoring along with all testing certificates for site plant and treated materials. We will also keep detailed records of material movements and re-engineering and provide an overall record of the works completed on site. We will also keep all duty of care and waste transfer information.

Full time site supervision is to be undertaken during the works including supervision from an independent licensed asbestos specialist.

All plant and machinery used at site will be suitably tested with up to date maintenance records. Daily maintenance sheets will be completed by competent drivers.

The works are being completed under the auspices of DoWCoP compliant QP declared MMP. Following completion of the works a verification report detailing all material movements and disposal information will be prepared. The verification report is required by DOWCoP and will detail how the works were completed in line with the regulator approved remediation strategy (708.00.02 Hafan y Môr Holiday Park Stockpile Recovery Plan). The verification report will include records of any monitoring or waste disposal.

No emissions are expected as part of the works. Background reassurance air monitoring will be undertaken to ensure that airborne fibres do not exceed the HSE defined Control Limits.

Alternatively, upload a copy of this below

- File: 708.00.08 - MS001 - Stockpile Recovery Plan.pdf - [Download](#)
- File: 708.00.10 - COSHH Forms- Hafan.pdf - [Download](#)
- File: 708.00.09 - RA's Hafan Holiday Park.pdf - [Download](#)

## Payment

How do you want to pay for your application fee?

Credit or debit card

## Supporting documents

Please ensure that you include the following relevant documents with your deployment application: Site plan showing all required features Conceptual Site Model and Risk Assessment Pollution Control Monitoring Plans Record Keeping details

- File: 708.00.01 - Site Treatment Plan.pdf - [Download](#)
- File: 708.00.01a - Site Works Methodology Plans.pdf - [Download](#)
- File: 708.00.04 - Redstart SR2008 No27 Permit - EPRBB3308HG.pdf - [Download](#)
- File: 708.00.05 -SR2008-No27- Risk Assessment.pdf - [Download](#)
- File: 708.00.06 - Letter of authorisation RH-PS (08-02-24).pdf - [Download](#)
- File: 708.00.07 - Comments and Additional Information Re. PAN-024179.pdf - [Download](#)
- File: 708.00.08 - MS001 - Stockpile Recovery Plan.pdf - [Download](#)
- File: 708.00.10 - COSHH Forms- Hafan.pdf - [Download](#)
- File: 708.00.11 - ATBRE YMLFW Enquiry about use of the CLARIE DoWCoP.pdf - [Download](#)
- File: 708.00.12 - RE Enquiry about use of the CLARIE DoWCoP.pdf - [Download](#)

Please provide your payment reference

**Payment reference** 138

**Amount paid** 0

## Declaration

Are you signing the form on behalf of a relevant person?

If you are not a relevant person, but want to sign the application on their behalf, you must include confirmation that you can do this.

Yes

Please upload written confirmation here

- File: 708.00.06 - Letter of authorisation RH-PS (08-02-24).pdf - [Download](#)

Does your deployment application relate to a standard facility permit?

If your deployment application is being made in relation to a standard facility permit (SRP), you also need to confirm that you are able to meet all relevant criteria of the standard rule set/sets under which you are applying.

I confirm that my activity/activities will fully meet the rules of the permit I have applied under

If you knowingly or recklessly make a statement which is false or misleading to help you get an environmental permit (for yourself or another person), you are committing an offence under the Environmental Permitting (England and Wales) Regulations 2016.

I declare that the information in this application is true to the best of my knowledge and belief. I understand that this application may be refused or approval withdrawn if I give false or incomplete information.

I understand that if I knowingly or recklessly make a false or misleading statement: I may be prosecuted; and if convicted, I may have to pay a fine and/or go to prison. By signing below, you are confirming that you understand and agree with the declaration above.

<b>Title</b>	Mr
<b>First name</b>	Phil
<b>Last name</b>	Sales
<b>On behalf of (if relevant)</b>	Redstart Northwest Limited
<b>Today's date (DD/MM/YYYY)</b>	16/02/2023

Add another signature?

No