

# **Caulmert Limited**

Engineering, Environmental & Planning  
Consultancy Services

**Ewloe Recycling Facility**

**Thornccliffe Building Supplies Waste Ltd**

**Environmental Permit Variation Application**

**Supporting Document**

**Prepared by:**

**Caulmert Limited**

5 Farrington Way, Eastwood Link Business Park, Eastwood, Notts, NG16 3BF

**Tel:** 01773 749132

**Email:** [andystocks@caulmert.com](mailto:andystocks@caulmert.com)

**Web:** [www.caulmert.com](http://www.caulmert.com)

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## APPROVAL RECORD

**Site:** Ewloe Waste Recycling Facility

**Client:** Thorncliffe Building Supplies Ltd

**Project Title:** Ewloe IED Permit Variation

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**Project Manager:** Andy Stocks

**Caulmert Limited:** 5 Farrington Way, Eastwood Link Business Park, Eastwood, Notts NG16 3BF

**Tel:** 01773 749132

<b>Author</b>	Andy Stocks	<b>Date</b>	29/07/16
<b>Reviewer</b>	Lisa Sumner	<b>Date</b>	01/08/16
<b>Approved</b>	Andy Stocks	<b>Date</b>	02/08/16

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## **1. INTRODUCTION**

### **1.1 Application context**

- 1.1.1 Thorncliffe Building Supplies Ltd (hereby known as the 'Operator') operates the Ewloe Materials Recycling Facility located on Ewloe Industrial Estate off the A494 Mold Road, Flintshire.
- 1.1.2 Caulmert Limited were appointed by the Operator to prepare an application to vary the existing permit to add a listed activity under EPR as a result of the Industrial Emissions Directive.

### **1.2 Document structure**

- 1.2.1 This Supporting Document has been prepared to provide additional information to support the information provided in Parts C2 and C3 of the environmental permit application forms for varying a bespoke permit. To aid cross-referencing between this document and the application form, the various issues are presented in the same order as in the application form and the headings in this document include the specific question number to which the information relates.

## **2. EXISTING PERMIT AND PRE-APPLICATION DISCUSSIONS**

### **2.1 Part C2 – 1b: Pre-application discussions**

- 2.1.1 Pre-application discussions have been held with Andrew Sowerby, Environment Officer, from Natural Resources Wales regarding the application.

### **2.2 Part C2 – 1c: Permit number**

- 2.2.1 The original permit was issued as a Waste Management Licence in June 2005 (EAWML 37266) to Flintshire Waste Management and Contract Services Ltd. A full transfer of the permit to Thorncliffe Building Supplies occurred 15<sup>th</sup> September 2008, EPR/BB3797SZ/T001. The permit was varied a further three times with the most recent variation determined on 23<sup>rd</sup> September 2015 (V004).

## **3. THE PROPOSED CHANGES**

### **3.1 Changes to existing activities (Part C2 question 2b)**

### **3.2 Proposal description**

- 3.2.1 There are no actual proposed changes to operations at the site, however some of the current operations are now considered to be listed activities as a result of the implementation of the Industrial Emissions Directive.

- 3.2.2 Only activities related to the production of RDF are covered within this application. However this does include associated activities that are not necessarily part of the listed activity to which this application relates.
- 3.2.3 The Site operates as a waste recycling centre which includes the production of RDF which is used for fuel at the nearby Runcorn Energy Plant. As a result of an additional local authority contracts the production of RDF has increased to around 150 tonnes per day.
- 3.2.4 In addition a planning application is due to be submitted for an additional building on site to be built as shown on the proposed layout (drawing 2784.CAU.VN.XX.DR.V.0002.A0.C1) into which the RDF process will be relocated.
- 3.2.5 Operations at the site include the pre-treatment of waste for incineration. The Site shreds the waste as part of the treatment process. As the RDF plant is now processing over 50 tonnes per day and is therefore a listed activity, an installation permit is required for future operations, as agreed with NRW.
- 3.2.6 The contracts places fuel specification restrictions on calorific value, moisture content, ash content, chemical composition and heavy metal content which has to be achieved via the treatment process and verified through sampling and testing at an accredited laboratory.
- 3.2.7 The receiving plant does not currently have R1 accreditation although it is considered that it is able to meet the R1 Energy Recovery formula and is expected to apply in the very near future.
- 3.2.8 The existing infrastructure in place is adequate to facilitate the processing of RDF materials however the proposed larger RDF facility will improve operations at the site.
- 3.2.9 The annual throughput of waste will not exceed the currently permitted 125,000 tonnes per year.

### **3.3 Part C2 – 2a: Type of variation**

- 3.3.1 This application is being made to add the following activity to the permit: Section 5.4 A(1) a) (iii) “disposal of non-hazardous waste with a capacity exceeding 50 tonnes per day involving pre-treatment of waste for incineration or co-incineration.”
- 3.3.2 It is considered to be a normal variation in accordance with pre application advice from NRW regarding existing operations falling under IED.

### **3.4 Part C2 – 2b: Changes to existing activities**

- 3.4.1 The application question 2b requests that information should be given about changes to existing activities.

- 3.4.2 The existing permitted activities consist of a waste facility for the storage, treatment and transfer of a wide range of non-hazardous wastes, together with the storage and transfer of some hazardous wastes.
- 3.4.3 There are no proposed changes to the current permitted activities, however operations at the site include pre-treating non-hazardous waste for incineration or co-incineration activities. This is a prescribed activity under EPR as a result of the Industrial Emissions Directive.
- 3.4.4 The maximum storage capacity for loose delivered waste is 5,500 tonnes.
- 3.4.5 The overall storage capacity for RDF is 1,000 tonnes of waste with the capacity of 750 tonnes for storing bales outside temporarily on impermeable pavement.
- 3.4.6 The potential treatment capacity for the RDF facility is 200 tonnes per day, however the plant will typically produce 150 tonnes per day.

#### **4. OPERATOR ABILITY**

##### **4.1 Part C2 – 3a: Relevant offences**

- 4.1.1 There are two relevant offences recorded against the Operator,
- Accepting unauthorized waste at their Abergele site on 30<sup>th</sup> April 2010. Fined £2,500 on 9<sup>th</sup> March 2012 at Mold Magistrate Court.
  - Duty of care offences in respect of accepting & retaining wastes at their Ewloe site between 30/4/2010 and 3/08/2010. Fined £4,500 on 9<sup>th</sup> March 2012 at Mold Magistrates Court.

##### **4.2 Part C – 3b: Technical ability**

- 4.2.1 Suitably qualified staff are in control of the operations on a daily basis. The technically competent manager has the required Wamitab Qualification. The site's technically competent managers are Daniel Harper and James Morgan.
- 4.2.2 Copies of their Wamitab certificates and certificates of continued competence are contained within Appendix 1.

##### **4.3 Part C2 – 3d: Management system**

- 4.3.1 The Operator has an Environmental Management System (EMS) to control the operations at the site.
- 4.3.2 This management system also incorporates a number of other procedures and documents, which are used in the operation of the site.

4.3.3 These management procedures for the site are considered adequate to control the existing activities which remain unchanged.

4.3.4 A summary of the management system for the site is included in Appendix 2 of this document.

***Identifying and minimising risks of pollution***

4.3.5 An environmental risk assessment has been carried out for the purpose of this variation which assesses the environmental risks from all the relevant activities affected by this variation.

4.3.6 The risk assessment was also used as a tool for identifying the risk management measures that are important in minimising the risks of pollution. The identified risk management measures are considered to be the minimum technical standards which the site should operate to.

4.3.7 A plan showing the sensitive receptors around the site and a site layout plan showing the location of drainage infrastructure and waste storage and processing areas have also been prepared.

***Operations and maintenance***

4.3.8 With regards to the proposed changes, the control measures identified within the Amenity and Accident Risk Assessment will form the technical standards for the site.

4.3.9 Maintenance is managed through individual maintenance schedules for each piece of the machinery on site.

***Incidents and non-conformances***

4.3.10 Any incidents or non-conformances will be recorded in the daily site records. A daily site inspection is carried out by a technically competent manager. Staff are also encouraged to report any issues to a technically competent manager.

***Complaints***

4.3.11 The company has a Complaints Procedure, which forms part of the management system for the site.

***Staff training and competence***

4.3.12 Training is provided so that all workers have a satisfactory understanding of their duties in relation to environmental and health & safety issues on site.

4.3.13 For machine operators, the company ensures that training and certification in relation to the particular machine is undertaken by all machine operators prior to their use of that machine.

- 4.3.14 As outlined in section 4.2 above, technically competent managers are WAMITAB trained and undergo continuing competence assessments as required under the CIWM/WAMITAB competency scheme.

***Odour, noise and emissions management***

- 4.3.15 The management system includes measures that will be taken to manage odour, noise and emissions and a Dust Management Plan and a Fire Prevention and Response Plan was completed in 2015.
- 4.3.16 In addition, the technical standards proposed for the management of odour, noise and other emissions, which were identified through the amenity and accident risk assessment for this application, will form part of the management system for the site.
- 4.3.17 The management measures are supported by the daily checks which are carried out by the technically competent managers who will consider the most appropriate action to take.

***Documentation of legislative and other requirements***

- 4.3.18 Copies of planning permissions, environmental permits and other relevant permissions are kept either as paper records or electronically.
- 4.3.19 The technically competent managers keep up-to-date with other legal requirements and changes to relevant environmental legislation through trade magazines and the NRW & Environment Agency websites.

***Management reviews***

- 4.3.20 Management periodically review the environmental performance of the Company through their review of environmental audit reports and the daily site records.
- 4.3.21 The environmental policy statement is also reviewed periodically to ensure it reflects the company's operations and its environmental objectives.

**5. SUPPORTING INFORMATION**

**5.1 Part C2 – 5a: Plans for the site**

- 5.1.1 This question requires that where an operator is seeking to add land as part of the variation application, a revised site plan that identifies all of the land on which the activities will take place must be submitted.
- 5.1.2 No additional land is being sought, however drawings produced to support this application are detailed in Table 1 below.



**Table 2: Description of the submitted site plans**

Drawing No. & Title	Content
2784.CAU.VN.XX.DR.V.0001.A0.C1	Site Location Plan
2784.CAU.VN.XX.DR.V.0002.A0.C1	Site Permit Boundary and Layout
2784.CAU.VN.XX.DR.V.0003.A0.C1	Site Drainage Plan
2784.CAU.VN.XX.DR.V.0004.A0.C1	Receptors Plan

- 5.1.3 An electronic copy of drawing 2784.CAU.VN.XX.DR.V.0002.A0.C1 is available on the submitted CD for inclusion in the permit.

## **5.2 Part C2 – 5b: Site report for any additional land**

- 5.2.1 There is no additional area of land is being sought and so a Site Report is not required.

## **5.3 Part C2 – 5c: Non-technical summary**

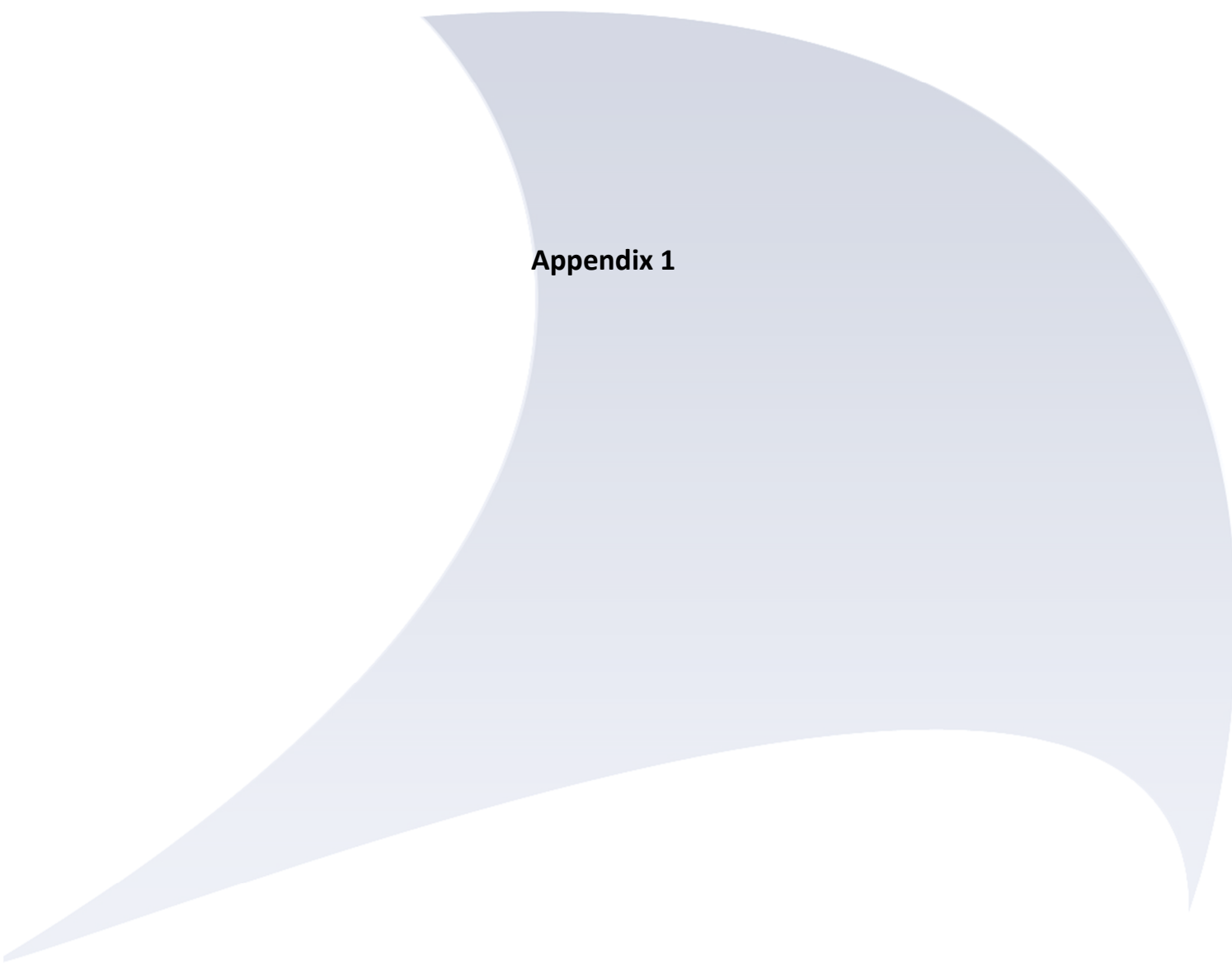
- 5.3.1 Thorncliffe Building Supplies Ltd operate Ewloe Recycling Facility on Ewloe Business Park in Flintshire.
- 5.3.2 There are no actual proposed changes to the way in which the site is operated however some of the current operations at the site include pre-treating non-hazardous waste for disposal based incineration or co-incineration activities, in quantities over 75 tonnes per day. This is a newly prescribed activity under the Environmental Permitting Regulations as a result of the Industrial Emissions Directive and consequently the permit requires amendment.
- 5.3.3 Only activities related to the production of Refuse Derived Fuel (RDF) are covered within this application. However this does include associated waste activities that are not necessarily part of the listed activity to which this application relates.
- 5.3.4 The existing infrastructure in place facilitates the current operations on site. However to improve site operations, a planning application for a larger building to house the RDF facility on site is to be submitted shortly. Details have been provided within the application.
- 5.3.5 A comprehensive management system is in place at the site to include for current operations.
- 5.3.6 Risk assessments have been carried out to assess the impact of the activities affected by the variation.

## **6. REFERENCES**

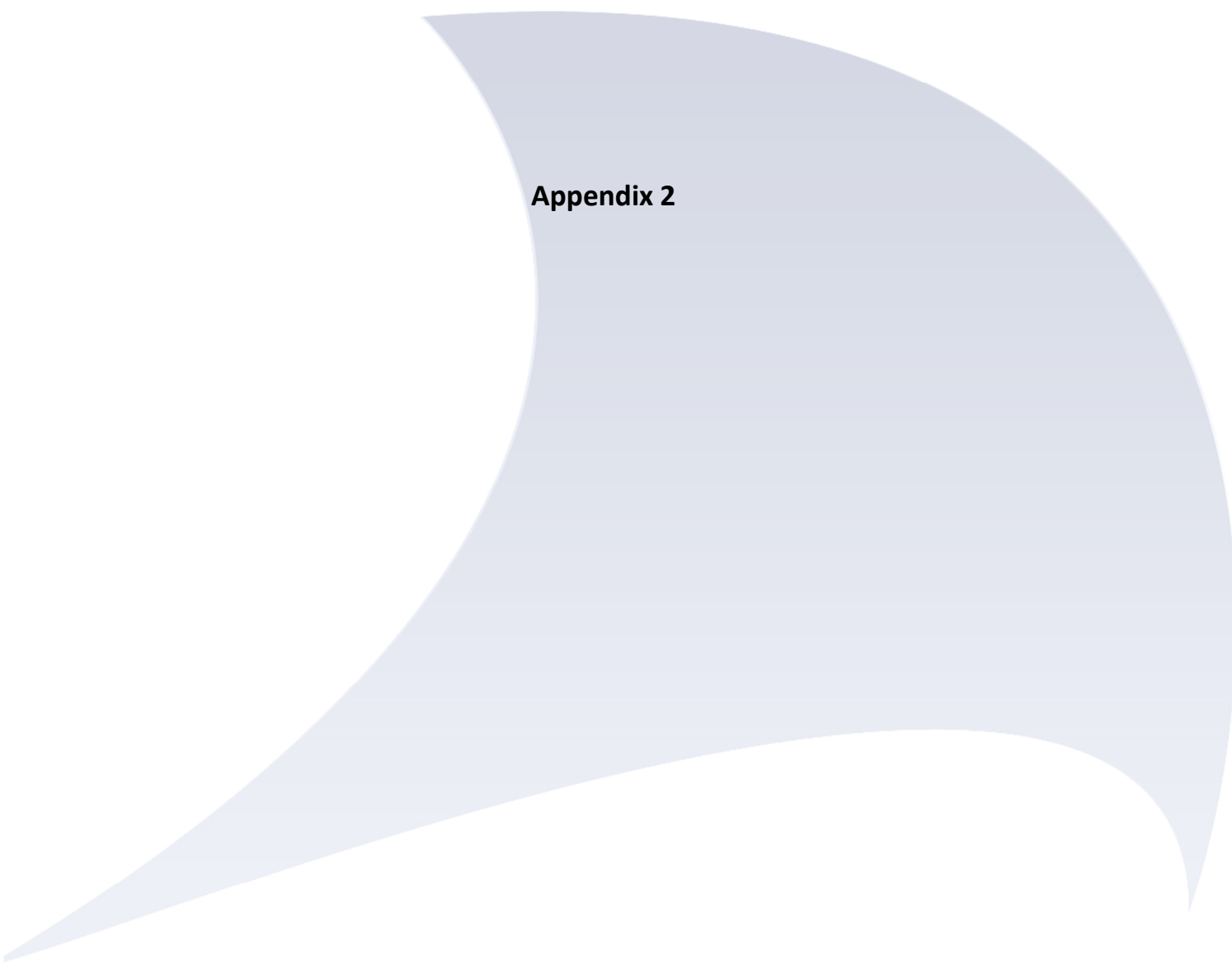
Natural Resources Wales (2016): Guidance for environmental permit applications: Part C2 – General: Varying a bespoke permit. Version 1, July 2016.



**Drawings**



## **Appendix 1**



## Appendix 2





Registered Office: Parc Menai, Bangor, Gwynedd, LL57 4FG

**Tel:** 01248 672666

**Fax:** 01248 672601

**Email:** [contact@caulmert.com](mailto:contact@caulmert.com)

**Web:** [www.caulmert.com](http://www.caulmert.com)