

1. ALAN'S SKIP HIRE WALES LTD PERMIT VARIATION – NON-TECHNICAL SUMMARY

1.1. ALAN'S SKIP HIRE WALES LTD

Alan's Skip Hire Ltd (ASH) has an Environmental Permit (the EP) for its household, commercial and industrial waste transfer station with treatment and waste wood treatment activities located at:

ASH Wrexham Recycling Centre
Redwither Road
Wrexham Industrial Estate
Wrexham
LL13 9RD

1.2. ENVIRONMENTAL PERMIT

The sites EP (EPR/WP3094FB/V004) permits an annual throughput of 75,000 tonnes.

1.3. VARIATION APPLICATION

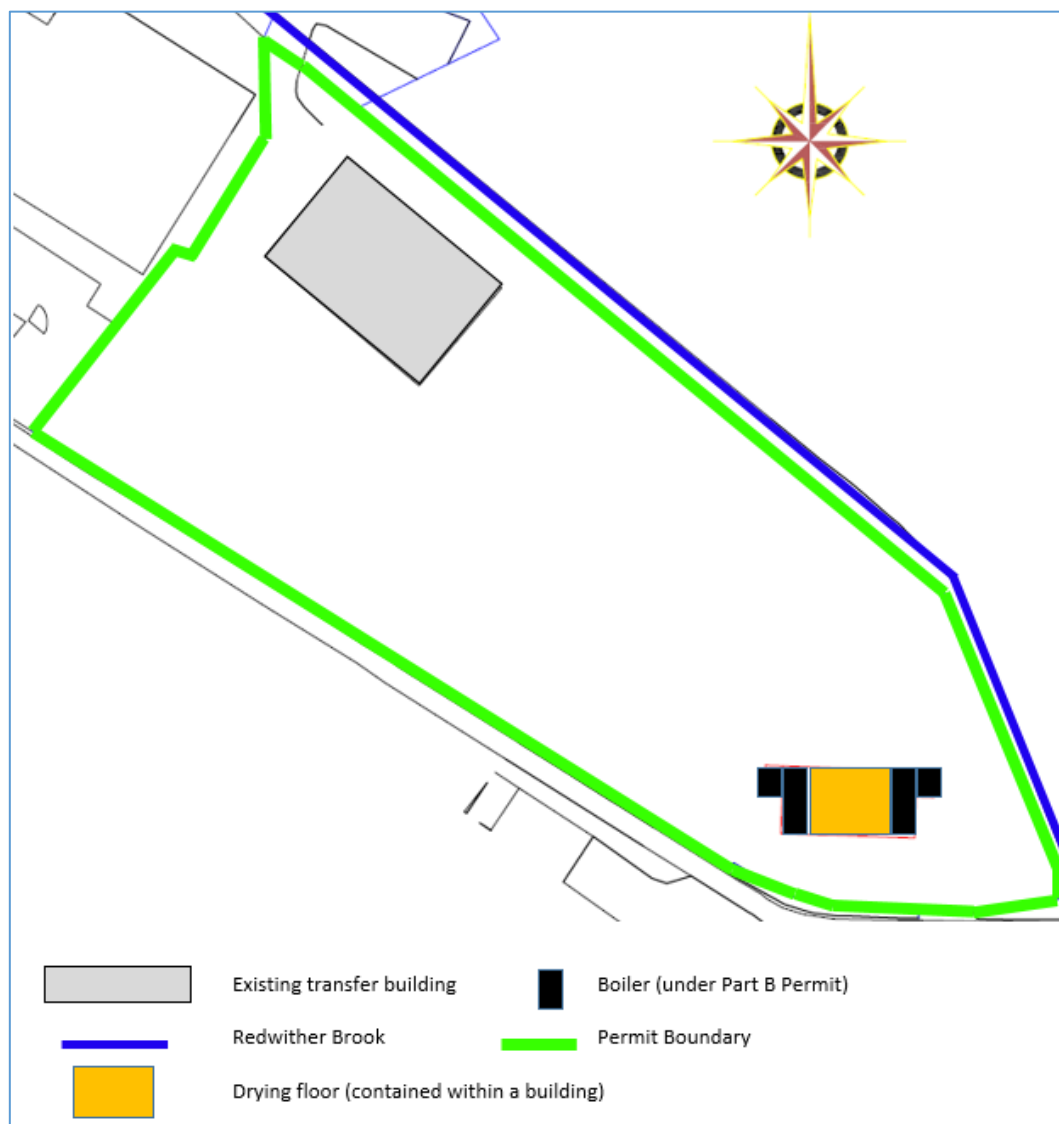
An application is being made to vary the permit to allow 'Heat treatment for the purposes of recovery'. Waste being subject to this process will be limited to no more than 75 tonnes per day. In accordance with the Environmental Permitting Regulations 2016, this falls outside the Industrial Emissions Directive and, therefore, remains as a waste permit.

1.4. PERMITTED AREA

Due to the expansion of the site and increase of the concreted surface area, the variation application includes a proposed extension to the area included within the EP. This is detailed in the diagram below.



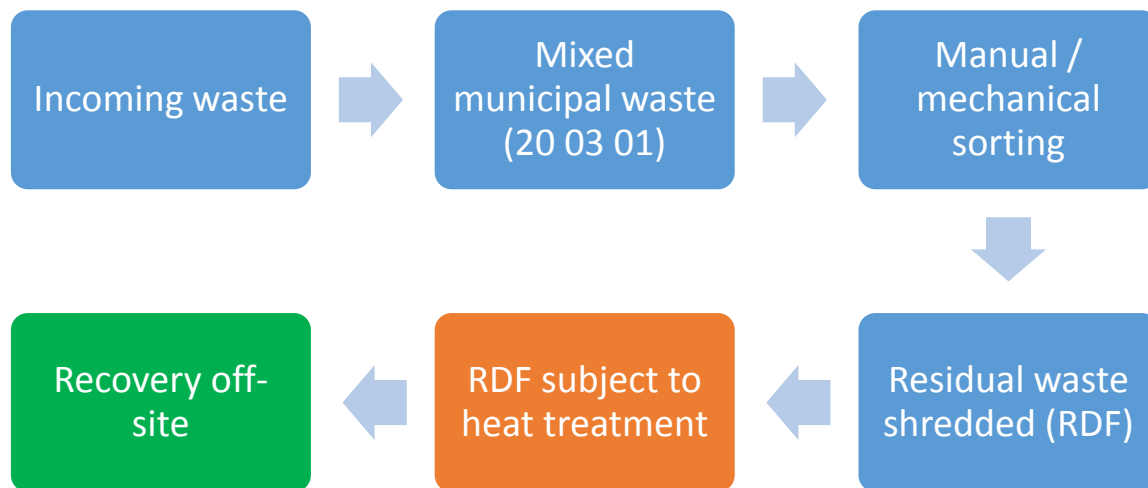
The new area to be included within the Environmental Permit variation includes a building (as shown in the south-eastern corner in the below diagram). This building houses two biomass boilers and their wood stores which will come under the remit of a Part B Environmental Permit, to be regulated by Wrexham County Borough Council¹. The middle section of the building will contain a drying floor, which will be operated by Alan's Skip Hire Wales and is included as part of this Environmental Permit variation.



1.5. PROCESS OVERVIEW

An example of the process to be undertaken by the new activity is shown in the diagram below. The new activity is shown in the orange box, with activities occurring off-site (and outside the scope of the sites EP) are shown in green.

¹ The boilers will be operated by a separate company, ASH Heat and Power Ltd. The Part B application has been submitted and duly made. This Part B Permit will cover the boilers and the wood feed system. As the boilers / drying floor are located within separate sections within the building, this will provide a clear and physical separation between the two permitted activities and, therefore, eliminate any potential for dual regulation.



Waste wood may also be subjected to the process before being transported off-site for recycling or recovery activities under a separate operator and EP.

In addition, non-waste materials may also be subject to the process. As these other materials are not classed as wastes, these are not subjected to the EP.

The process will be undertaken in two areas:

1. A drying floor located within an existing building in the south-east of the Permitted area
2. Enclosed skips located in the south-east of the Permitted area

The heat to be used will consist of hot air only: there is no combustion associated with the EP and the air temperature will be regulated. The hot air to be used will not be of a sufficiently high enough temperature to ignite the waste and therefore, the material will not be incinerated. In any case, the heat treatment activities will be closely monitored.

The drying floor will operate by blowing the heat under the floor. The enclosed skips will link up to pipes which will feed the hot air into the container.

1.6. PURPOSE OF HEAT TREATMENT

The process will be used for four primary reasons:

- 1) To reduce the moisture content and, therefore, improve the calorific value of waste destined for certain recovery processes, e.g. for energy from waste
- 2) To reduce the moisture content of wastes that are to be processed into new materials, e.g. waste wood
- 3) To reduce the weight of wastes leaving site, thereby either lessening the number of loads or the net weight of each load, resulting in more efficient transportation and a reduction in the associated carbon footprint
- 4) To use heat from another process (outside the scope of the EP) that would otherwise be lost to the environment

1.7. OPERATING CAPACITY

The maximum permitted capacity of the site will continue to remain at 75,000 tonnes per year. The total volume of waste subjected to the new process will not exceed 75 tonne per day. In the event that the operator wishes to increase this beyond 75 tonnes per day, the site will notify Natural Resources Wales immediately and begin discussions to vary this to an Installations permit. However, this is not foreseen and will be closely managed to ensure this is not the case.

1.8. ACCEPTED WASTES

As hazardous wastes are not permitted on the sites EP, no hazardous wastes will be subject to the new process. Any hazardous wastes that are received on site (as part of a mixed load) are to be quarantined in the area shown on the site layout.

ASH does not wish to add to the list of EWC codes allowed on the Permit as part of this variation. For the full list of EWC codes, please refer to the existing EP.

The wastes that will be subject to the process will not consist of dust, sludge's, slags, liquids (other than moisture within wastes such as general mixed waste (e.g. 19 12 10, 19 12 12 or 20 03 01)).

The wastes that will be subject to the process will principally be restricted to:

- 19 12 12 – other wastes from the mechanical treatment of wastes
- 20 03 01 – mixed municipal wastes
- Chapter 3 wastes are defined by the European Waste Catalogue that are acceptable under the sites Permit – wastes from wood processing
- 17 02 01 – construction & demolition wood
- 17 08 02 – gypsum-based construction materials
- 20 01 38 – wood from municipal sources
- 03 01 01 – waste bark and cork from wood processing
- 03 01 05 – sawdust, shavings, cuttings, wood etc. from wood processing
- 03 03 01 – waste bark and cork from paper and cardboard production
- 15 01 03 – wooden packaging
- 19 12 07 – waste wood from the mechanical treatment of wastes
- 20 02 01 – biodegradable waste from parks and gardens

1.9. FIRE RISKS

No additional risks are perceived by the site operators associated with the new process. However, a revised Fire Prevention and Mitigation Plan (FPMP) is in operation as part of the sites Environmental Management System which details how fires will be prevented and managed, including location of fire hydrants, fire breaks, site access and other pertinent information. This has not been submitted with this application, as no new wastes are to be added/removed to the Permit, nor is there any increase/decrease in the amount of waste to be accepted. However, this FPMP will be available for Natural Resources Wales officers to view on inspection of the site.

1.10. ENVIRONMENTAL MANAGEMENT SYSTEM

The site already runs to an EMS, with an update provided as part of the EP variation application.

ASH is currently in the final stages of implementing a group wide EMS to ISO 14001:2015 (and ISO 9001:2015 / OHSAS 18001:2007).