

# ENVIRONMENTAL PERMIT APPLICATION

## **Non-Technical Summary**

Prepared for: Tip Top Toilets

SLR Ref:402.07841.00001  
Version No:1  
June 2018





## BASIS OF REPORT

This document has been prepared by SLR Consulting Limited with reasonable skill, care and diligence, and taking account of the manpower, timescales and resources devoted to it by agreement with Mike Rees at Tip Top Toilets (the client) as part or all of the services it has been appointed by the Client to carry out. It is subject to the terms and conditions of that appointment.

SLR shall not be liable for the use of or reliance on any information, advice, recommendations and opinions in this document for any purpose by any person other than the Client. Reliance may be granted to a third party only in the event that SLR and the third party have executed a reliance agreement or collateral warranty.

Information reported herein may be based on the interpretation of public domain data collected by SLR, and/or information supplied by the Client and/or its other advisors and associates. These data have been accepted in good faith as being accurate and valid.

The copyright and intellectual property in all drawings, reports, specifications, bills of quantities, calculations and other information set out in this report remain vested in SLR unless the terms of appointment state otherwise.

This document may contain information of a specialised and/or highly technical nature and the Client is advised to seek clarification on any elements which may be unclear to it.

Information, advice, recommendations and opinions in this document should only be relied upon in the context of the whole document and any documents referenced explicitly herein and should then only be used within the context of the appointment.

## CONTENTS

<b>1.0</b>	<b>INTRODUCTION .....</b>	<b>3</b>
1.1	The Site .....	3
1.2	Summary of Proposed Activities .....	3
1.3	Waste Types .....	4
1.3	Specified Waste Management Activities .....	4
1.4	Waste Acceptance and Storage .....	5
<b>2.0</b>	<b>APPLICATION DOCUMENTS .....</b>	<b>6</b>
2.1	Operating Techniques Document .....	6
2.2	Environmental Risk Assessment .....	7
2.3	Site Condition Report.....	7
<b>3.0</b>	<b>CONCLUSION .....</b>	<b>8</b>

## REFERENCED DRAWINGS

DRAWING 001	Site Location Plan
DRAWING 002	Environmental Permit Boundary, Site Layout and Drainage
DRAWING 003	Sources, Pathways and Receptors
DRAWING 004	Cultural and Natural Heritage

## 1.0 Introduction

Tip Top Toilets has instructed SLR Consulting Limited (SLR) to prepare a bespoke Environmental Permit (EP) under the Environmental Permitting (England and Wales) Regulations 2016 (as amended) for their Fedw Hir Eco Centre Waste Transfer Station (WTS) at Fedw, Rhondda.

Natural Resources Wales (NRW) application forms require a non-technical summary to be submitted in support of any bespoke waste operation EP, which includes the following:

- an explanation of exactly what is being applied for;
- a summary of the regulated facility; and
- a summary of the key technical standards and control measures arising from the risk assessment.

This Non-Technical Summary should be read in conjunction with the rest of this application which comprises:

- Application Forms A, B2, B4, F1 and Supporting Information;
- Operating Techniques Document (SLR Ref: 402.07841.00001/OT);
- Supporting Drawings;
- OPRA Spreadsheet;
- Site Condition Report (SLR Ref: 402.07841.00001/SCR);
- Environmental Risk Assessment (SLR Ref: 402.07841.00001/ERA);

### 1.1 The Site

The Site is centred on National Grid Reference SN 99357 06198, and located at Fedw Hir, Llwydcoed, Aberdare, CF44 0DX. The site's location is illustrated on Drawing 001.

The surrounding area is predominantly open and agricultural land. Drawing 002 illustrates the layout of the site, which in summary comprises waste and non-waste storage areas, welfare facilities, a biomass boiler and kiln.

### 1.2 Summary of Proposed Activities

It is proposed that the site will be operated as a waste storage and transfer facility, accepting and storing up to 1,500,000 litres<sup>1</sup> of sewage waste per annum. There will be no treatment of this waste on site. This annual quantity will be made up of wastes accepted into site, and waste wash-down water generated on site.

It is anticipated that waste quantities will continue to increase as the business grows and the proposed annual waste acceptance quantity has been calculated to reflect this future growth.

---

<sup>1</sup> Using the WRAP conversion data, July 2014, which states EWC 20 03 04 as 1 tonne = 0.92 m<sup>3</sup>, 1,500,000 litres equates to 1380 tonnes per annum.

The site will hire out welfare facilities (toilets, showers and welfare units) for private and commercial events and to the construction industry within the local area. The units will be stored on site, as shown on Drawing 002. Units will be delivered to wherever needed and collected by Tip Top Toilet's own vehicles.

Upon cessation of the hire, Tip Top Toilets collect the units and transport them via their own vehicles back to the site. Upon arrival at the site the units will be emptied into either the storage tank or into an IBC. The waste will be transferred and accepted on site under the European Waste Catalogue (EWC) code 20 03 04 – septic tank sludge.

The tank and any IBC's will be contained within Waste Storage Area 1 as shown on Drawing 002. This will comprise a weatherproof poly tunnel with a fully engineered bunded area capable of providing bunding for up to 20,000 litres (28.8m<sup>3</sup>).

It is anticipated that Waste Storage Area 2, also marked on Drawing 002, will be developed within the near future to benefit from the same poly tunnel and engineered bunding arrangement. In order to retain flexibility, the maximum waste storage amount has been calculated based upon both waste storage areas being developed (57.6m<sup>3</sup>).

Waste will only be stored within sealed tank (s) sited on impermeable surfacing with engineered drainage such as is currently provided within Waste Storage Area 1. The development of Waste Storage Area 2 is likely to reflect that currently seen in Waste Storage Area 1 (albeit taking into account any revised standards or market conditions).

Any subsequent storage areas constructed on site will be fit for purpose and subject to full Construction Quality Assurance (CQA) plans and agreement with NRW.

NRW will be fully notified of any plans to changes or additions to waste storage on site.

Waste will be bulked up on site and when at capacity, the tank and / or IBS's emptied by an appropriate contractor and removed off site to a suitably permitted facility.

Chemical toilets require chemical dosing to ensure health and safety measures are met. A purpose built COSHH containment shed will be located on site, as shown on Drawing 002.

The site will wash down each unit between hire. The wash down utilises a steam cleaner, jet wash, water and additional chemicals as detailed in Appendix OT1. The wash down occurs at the location shown on Drawing 002.

The dimensions of the wash bay are 15m x 9m. It will be accompanied by a 2000 litre (L 91x W 70x H 16) above ground septic tank which will be adjacent to the wash bay within a bunded tank capable of holding 110% of the capacity of the tank. The septic tank will be emptied as required.

All infrastructure is subject to a weekly inspection to ensure it remains fit for purpose.

Currently, the site has approximately 180 units on site consisting of 52 event units, 89 site units, 8 disabled, 11 urinals, 8 luxury trailers and 9 welfare units.

### 1.3 Waste Types

Due to the nature of the site operating as a proposed storage and transfer facility for their own portable toilets/welfare units, only one type of waste will be accepted on site, which falls within one EWC code classification;

- 20 03 04 - septic tank sludge (chemical toilet)

Only waste collected, via the portable toilets/welfare units, by Tip Top Toilets will be accepted on site or wash down water produced on site, therefore limiting the likelihood of non-permitted wastes being accepted on site.

### 1.3 Specified Waste Management Activities

The activities that will be carried out at the site as defined under Annex II of the Waste Framework Directive can be summarised as follows:

- **R13:** Storage of wastes consisting of materials intended for submission to any operation numbered R1 to R12, but excluding temporary storage, pending collection, on the site where it is produced.

## 1.4 Waste Acceptance and Storage

The site will accept up to a total of 1,500,000 litres of waste arising from the acceptance and cleaning of mobile welfare facilities.

Currently, Waste Storage Area 1 can contain a maximum of 28.8 m<sup>3</sup> (28,800 litres) at any one time within the bunded area. As detailed in Section 1.2 above, it is envisaged Waste Storage Area 2 will be developed within the future which will double the storage capacity on site to 57.6 m<sup>3</sup>.

The storage of waste will be either in the purpose built tank or IBC's within the engineered bunded area.

Vehicles will enter site through the site entrance to the north and be directed to the waste storage area, as shown on Drawing 002.

## 2.0 Application Documents

### 2.1 Operating Techniques Document

The site will be operated in accordance with the Operating Techniques document which has been drafted to satisfy the requirements of EA Guidance, and details the following:

- management;
- site operations;
- emissions and monitoring; and
- Information.

Operational management procedures will ensure that:

- the risks that the activities pose to the environment are identified;
- the measures that are required to minimise the risks are identified;
- the activities are managed in accordance with the management system and operating techniques document;
- performance against the management system is audited at regular intervals; and
- compliance with the environmental permit.

The risk management and mitigation measures employed at the site and identified in the environmental risk assessment are detailed in the sites operating techniques document.

In summary, the rules and operating procedures employed at the site will ensure the following with respect to waste management activities:

- areas of hardstanding and vehicular pathways will be kept in a good state of repair and fit for purpose.
- transfer of waste between units and the tank / tank and tanker will be within an area of concrete surfacing with contained drainage.
- any clean surface runoff from roofs, or areas not used in connection with storing and treating waste will be separately managed and drain to soakaway;
- strict waste acceptance procedures will be adhered to, to ensure only permitted wastes are accepted on site;
- storage of chemicals will be in accordance with HSE and COSHH recommendations;
- the site manager will ensure that regular inspections are made of the site. If necessary, remedial measures will be arranged as soon as possible.

The Operating Techniques document (reference 402.07841.00001/OT) is enclosed as Section 3 of this Environmental Permit application.



## 2.2 Environmental Risk Assessment

An environmental risk assessment (ERA) has been carried out to assess the environmental risk posed by the proposed development in accordance with NRW/EA guidance<sup>2</sup>.

There will be no point source emissions to land, air, surface or groundwater from the proposed facility.

Welfare facilities onsite and from the adjacent residential property are treated via an existing klargestier prior to discharge to soakaway.

The storage tank and IBC storage area within the waste storage area and will be contained within a weatherproof building that is suitably bunded and fit for purpose. Any spills into the bund will be pumped back into the tank. The Tank and IBC's will be emptied as required.

Operational procedures at the site will monitor and manage amenity and accident risks from the proposed activities and includes provision for the monitoring of odour, noise, and fugitive emissions. The impact of the proposed development on surrounding human and environmental receptors has been assessed in the ERA, and the receptors are illustrated on Drawings 003 and 004.

Subject to the implementation of appropriate management measures, the conclusion has been reached that the proposed activities are unlikely to result in a significant accident risk or risk to the local environment.

The ERA (reference 402.07841.00001/ERA) is enclosed as Section 4 of this EP application.

## 2.3 Site Condition Report

A site condition report (SCR) has been prepared as part of this application to establish the baseline environmental conditions within the proposed permit boundary.

The site has historically been of agricultural nature, thus there is the possibility of existing ground contamination, no intrusive surveys have been undertaken to determine baseline soil and groundwater data.

The facility will operate with due regard to the conditions of the environmental permit and all relevant environmental legislation to ensure that land and groundwater is protected during the lifetime of the site and that the land is in a satisfactory state when the permit is eventually surrendered.

The possibility of any significant releases to the ground occurring during the lifetime of the permit is therefore limited. All waste will be stored within containment (tank or IBC) on areas of impermeable concrete to eliminate direct potential pathways to soil and groundwater. Minor spillages, if they occur, will be dealt with immediately by trained staff using appropriate spill response procedure and spill kits located around the site. The impermeable concrete site surfacing will locally break any potential pathway for contaminants that could be emitted from the permitted activities to land or groundwater.

The site condition report (reference 402.07841.00001/SCR) is enclosed as Section 5 of this environmental permit application. It has been prepared in accordance with Natural Resources Wales (NRW) guidance.

<sup>2</sup> <https://www.gov.uk/government/collections/risk-assessments-for-specific-activities-environmental-permits>

## 3.0 CONCLUSION

The overall conclusion of the studies undertaken in support of this bespoke environmental permit application for a waste transfer facility at Rhondda, Cardiff is that there is unlikely to be a significant environmental impact.

Tip Top Toilets are fully committed to ensuring the highest standards are met and will undertake their activities in a manner consistent with best industrial practices and in accordance with the company's environmental management system.

## EUROPEAN OFFICES

### United Kingdom

#### AYLESBURY

T: +44 (0)1844 337380

#### BELFAST

T: +44 (0)28 9073 2493

#### BRADFORD-ON-AVON

T: +44 (0)1225 309400

#### BRISTOL

T: +44 (0)117 906 4280

#### CAMBRIDGE

T: + 44 (0)1223 813805

#### CARDIFF

T: +44 (0)29 2049 1010

#### CHELMSFORD

T: +44 (0)1245 392170

#### EDINBURGH

T: +44 (0)131 335 6830

#### EXETER

T: + 44 (0)1392 490152

#### GLASGOW

T: +44 (0)141 353 5037

#### GUILDFORD

T: +44 (0)1483 889800

#### LEEDS

T: +44 (0)113 258 0650

#### LONDON

T: +44 (0)203 691 5810

#### MAIDSTONE

T: +44 (0)1622 609242

#### MANCHESTER

T: +44 (0)161 872 7564

#### NEWCASTLE UPON TYNE

T: +44 (0)191 261 1966

#### NOTTINGHAM

T: +44 (0)115 964 7280

#### SHEFFIELD

T: +44 (0)114 2455153

#### SHREWSBURY

T: +44 (0)1743 23 9250

#### STAFFORD

T: +44 (0)1785 241755

#### STIRLING

T: +44 (0)1786 239900

#### WORCESTER

T: +44 (0)1905 751310

### Ireland

#### DUBLIN

T: + 353 (0)1 296 4667

### France

#### GRENOBLE

T: +33 (0)4 76 70 93 41