

# NON-TECHNICAL SUMMARY

101 Amington Road, Birmingham, B25 8EP

**Kiely Bros. Ltd**

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1.2	03/05/2024	CP	KBL	EA comments – updated to Sections 1.1 and 2.5.

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# **1 Introduction**

## **1.1 Note**

1.1.1 This Non-Technical Summary (NTS) accompanies an application for a variation of EPR/FB3403ZY which is operated by Kiely Bros. Ltd. The Environmental Permit is situated at 101 Amington Road, Birmingham, B25 8EP.

1.1.2 Kiely Bros. Ltd hold and operate an Environmental Permit (EP); Ref. EPR/FB3403ZY which will be operated as a Section 5.4 (a)(iii) and b(ii) non-hazardous waste installation. The site will primarily be accepting residual waste under EWC codes 19 12 10 and 19 12 12 from their facility at Speedwell Road which will be treated to produce a solid recovery fuel (SRF) which will be sent for incineration.

1.1.3 The current EP allows for the acceptance, storage and treatment of mixed household, industrial and commercial (HIC) waste under an A11 activity, this activity is discussed in Section 3.6 of this EMS.

1.1.4 The EP also allows for acceptance, storage and treatment of construction, demolition and excavation (CDE) waste under an A16 activity but as this activity is not taking place at the site and will be relinquished from the EP.

1.1.5 The site will be regulated by the EA under the Environmental Permitting (England & Wales) Regulations 2016 and IED Regulations.

## **2 Application proposals**

### **2.1 Variation proposals**

2.1.1 The operator is seeking to add the below activity to treat more 75 tonnes of the waste described in section 1.1.2 per day for a mix of recovery and disposal which will lead to the site form part of the Industrial Emissions Directive (IED) Regulations which leads the requirement for this permit variation.

2.1.2 The site will be operated under Section 5.4 (a)(iii) and (b)(ii) - non-hazardous waste of the IED Regulations.

2.1.3 The site will retain the A11 activity shown on the existing EP but the A16 activity will be removed.

2.1.4 In terms of the A11 activity, the only activities which will take place comprise the acceptance, sorting (by hand) and storage of wastes.

2.1.5 Table S1.1 from the permit has been extracted and the proposed updates are shown in yellow in the table overleaf.

Table 3.1 – Table S1.1 Updates

<b>Table S1.1 activities</b>	
<b>Description of activities for waste operations</b>	<b>Limits of activities</b>
<b>A16 Activity - acceptance, storage and treatment of mechanically treated construction, demolition and excavation waste for washing and producing a secondary aggregate.</b>	
<b>ACTIVITY TO BE REMOVED</b>	
A11 Activity - acceptance, storage and treatment of mechanically treated household, commercial and industrial (HCI) waste for further recycling/recovery.	
R3: Recycling/reclamation of organic substances which are not used as solvents	Treatment of waste listed in table S2.2 including manual sorting or compaction of non-hazardous waste for disposal (no more than 50 tonnes per day) or recovery.  Subject to any other requirements of this permit wastes shall be stored for no longer than 1 year prior to disposal or 3 years prior to recovery.  The aggregate total of recovery of slags and ashes shall not exceed 75 tonnes per day (for the A16 and A11 activity combined) - <b>REMOVE</b>  The total of disposal of slags and ashes shall not exceed 50 tonnes per day for disposal. Waste types as specified in Table S2.2 - <b>REMOVE</b>
R4: Recycling/reclamation of metals and metal compounds	
R5: Recycling/reclamation of other Inorganic materials	
R13: Storage of waste pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where the waste is produced)	
D9: Physico-chemical treatment not specified elsewhere which results in final compounds or mixtures which are discarded by means of any of the operations numbered D1 to D12	

### 3 Types of activities

3.1 The table below makes reference to Table 1a - Types of activities from Application Form Part C3 which are proposed as part of this variation

Table 3.1 – Table 1 – Changes to existing activities (EPC2 – Page 3)

Installation Name	Schedule 1 References	Description of the Activity	Activity capacity	Annex II (R codes)	Hazardous waste treatment capacity	Non-hazardous waste treatment capacity	Limits of specified activity and waste types
Kiely Bros. Ltd EPR/FB3403ZY	S5.4 A(1) (b) (ii)	Recovery or a mix of recovery and disposal of non-hazardous waste with a capacity exceeding 75 tonnes per day involving pre-treatment of waste for incineration or co-incineration	1,000 tonnes	R3	No hazardous waste to be treated	300 tonnes / day	Physical treatment of solid non-hazardous waste to produce Solid Recovered Fuel (SRF).  Treatment operations shall be limited to physical treatment including manual sorting, separation, screening, shredding, compaction or blending for the purpose of producing SRF for recovery.  Waste treatment shall take place within an enclosed building and on an impermeable surface with sealed drainage system.
<b>Directly Associated activities</b>							
Kiely Bros. Ltd EPR/FB3403ZY	N/A	N/A	1,000	R12, R13	N/A	N/A	Receipt and storage of non-hazardous waste pending its use in the production of SRF.  All waste storage shall take place within an enclosed building and on an impermeable surface with sealed drainage.
Kiely Bros. Ltd EPR/FB3403ZY	N/A	Bulking of recyclable wastes recovered as an incidental part of the SRF production process	1,000	R3, R4, R5	N/A	N/A	Bulking of recyclables and residual waste generated from SRF production.  All bulking activities shall take place within an enclosed building and on an impermeable surface with sealed drainage system.
Kiely Bros. Ltd EPR/FB3403ZY	N/A	Storage of recovered SRF recyclables and residual wastes pending removal from the site.	1,000	R3, R4, R5	N/A	N/A	Storage of recovered SRF and recyclables and residual wastes shall take place in an enclosed building and on an impermeable surface with sealed drainage system.
Kiely Bros. Ltd EPR/FB3403ZY	N/A	Storage of raw materials, including lubrication oil and diesel	N/A	N/A	N/A	N/A	From the receipt of raw materials to despatch for use within the facility.
Kiely Bros. Ltd EPR/FB3403ZY	N/A	Collection and storage of uncontaminated roof and potentially contaminated site surface water	N/A	N/A	N/A	N/A	From the collection of uncontaminated roof and potentially contaminated site surface water to discharge into the mains sewer system.



## **4 Proposed EWC codes**

### **SECTION 5.4 ACTIVITY**

4.1 It is proposed to accept, store and treat the following EWC codes at the site under the S5.4 activity:

- 19 12 10 - combustible waste (refuse derived fuel)
- 19 12 12 - other wastes (including mixtures of materials) from mechanical treatment of wastes other than those mentioned in 19 12 11

### **A11 ACTIVITY**

4.2 It is proposed to accept, store and treat the following EWC codes at the site under the A11 activity:

- 17 09 04 – Mixed C&D waste
- 20 03 01 – Mixed municipal waste
- 20 03 07 – Bulky waste

4.2.1 All existing EWC codes on the permit can be removed.

## 5 Documentation and fees

5.1 The following table sets out the fees required for the application.

Table 5.1 – Base Application Fee Table

<b>EPR Charging Scheme Ref</b>	<b>EPR Charging Scheme Ref &amp; Description</b>	<b>Type of application (Ref)</b>	<b>Fee</b>
1.16.2.3	Section 5.4 (a)(iii) and (b)(ii) - non-hazardous waste installation – pre-treatment for incineration or co-incineration	<i>New activity</i>	13,288
1.19	Charges for other assessments, Fire, Odour, Dust, Noise	Assessments	£4,974
		<b>TOTAL</b>	<b>£18,262</b>

5.2 The table overleaf summarises which parts of the application forms request the above documentation which would normally be completed in Application Form Part F1; Section 6.

**Table 5.2 – Application Form Reference Table**

<b>Application Form</b>	<b>Question Ref</b>	<b>Document Ref</b>	<b>Document Description</b>
Part C2	2b & Table 1	AMI-918-C	Non-technical Summary (NTS)
Part C2	3	AMI-918-K	WAMITAB Certs
Part C2	3d	AMI-918-A	Environmental Management System (EMS)
Part C2	4a	AMI-918-B (Appendix III)	Fire Prevention Plan (FPP)
Part C2	5a	AMI/918/01 - AMI-/918/04 – also found in Appendices of main documentation	Site Specific Drawings
Part C2	5c	AMI-918-C	NTS
Part C2	5d	AMI-918-B	FPP
Part C2	5e	AMI-918-B	FPP
Part C2	5f	AMI-918-C	NTS
Part C2	6	AMI-918-D	Environmental Risk Assessment
Part C3	1	AMI-918-C	NTS
Part C3	Table 1b	AMI-918-C	NTS
Part C3	2 – Table 2	AMI/918/05	Point Source Emissions Plan
Part C3	3 - Table 3	AMI-918-C & AMI-918-J	NTS & BAT Assessment (BAT)
Part C3	3a1	AMI-918-C & AMI-918-J	NTS & BAT
Part C3	3b - Table 4	AMI-918-F & AMI-918-G	Noise Impact Assessment (NIA) & Noise & Vibration Management Plan (NVMP)
Part C3	3c – Table 5	AMI-918-J	BAT
Part C3	4a	AMI-918-H, AMI-918-J	Dust Management Plan (DMP) & BAT
Part C3	6a – 6e	AMI-918-J	BAT
Part C4	1 & Table 1a	RLRP-1040-C	NTS
Part C4	2 & Table 2	AMI/918/05	Point Source Emissions Plan
Part C4	3a	AMI-918-J	BAT
Part C4	3b	AMI-918-F, AMI-918-G & AMI-918-I	NIA, NVMP & Odour Management Plan (OMP)
Part C4	4a	AMI-918-J	BAT
Part F1	1 (Table 2)	AMI-918-C	NTS
Part F1	6	AMI-918-C	NTS

## **6 BAT Summary**

### **6.1 Energy efficiency**

6.1.1 The site has objectives to save energy at all times and operate in as energy efficient manner as possible. The bulking and compaction operations minimise travel for the wastes. The site has a separate repair and blasting workshop to ensure skips can be repaired and re-furbished rather than scrapped.

6.1.2 The company is committed to using the most efficient equipment as this is usually the most cost effective.

### **6.2 Use of Raw Materials Including Water**

6.2.1 The use of raw materials is quite limited fuel and lubricants for the mobile plant, water for the frag and wipes and rags for general cleaning.

6.2.2 Water use is predominantly for the frag and the operator will explore the viability of harvesting rainwater for use in the plant.

### **6.3 Reduction of Waste**

6.3.1 The company is committed to reducing waste the company provides a service to ensure small volume difficult to handle wastes are recovered/recycled or disposed of as efficiently as possible.

6.3.2 The company is also committed to providing a service to customers which reduces the road miles per tonne for wastes by providing intermediate facilities for treating and bulking wastes.

# Appendix I

## Pre-application advice