

Our ref: AS/AC/ST20310/LT003
Your ref: EPR/BS7951IB/V019

Date: 18th March 2025

Jonty Bates
Aqua House
20 Lionel Street
Birmingham
B31AQ

Dear Jonty,

Pilsworth MRF Schedule 5 Response EPR/BS7951IB/V019

With regards the Schedule 5 notice you sent on the 11th March, for the Pilsworth Materials Recycling Facility. Please find below our response to your questions. The questions have been replicated in ***bold italics*** for clarity with our response directly beneath each question.

A revised and updated version of the Dust Management Plan, Odour Management Plan and Operating Techniques are attached to this response.

1. Update and resubmit the Operating Techniques (ST20310-0002 V004, dated January 2025) to include the following:

- a. Provide details of the process for outgoing residual and incidental wastes in the event that they cannot be sent for disposal in the landfill on site.***

Please see Section 5.1.6 of the Operating Techniques.

2. Update and resubmit the Dust Management Plan (ST20310-0005 V4.0, dated January 2025) to include the following:

- a. Provide further details of contingencies in the case of abnormal events / unfavourable conditions.***

All operations at the MRF are contained in the building, the weather events you specified will therefore have no effect on the generation of dusts because the building will prevent wind whipping or desiccation of the wastes during dry weather.

If there are water shortages this will likely be a national issue affecting the mains water supply. As the site is fed by mains water it will adhere to any governmental guidance issued at the time. As the wastes are enclosed in a building they are unlikely to need dampening to prevent dust emissions as they are shielded from the sun and wind.



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As Stated in Section 6.3.5 *“Where necessary, in order to prevent significant emissions of dust, site operations will cease...”*

Section 6.4 of the DMP provides details of what may be considered an unfavourable condition and contingencies to address such.

b. Provide details of the triggers for any additional abatement processes.

Triggers for when additional dust abatement measure will be needed are when there are significant emissions of dust observed at the site. These will be noted during the housekeeping and site inspection checks. This is a visual trigger and covered by the housekeeping log/ daily site checks.

Damping down will be utilised on the haul roads during hot dry weather as stated in Table 4.1. It is difficult to set a detailed trigger for these events as a specific temperatures or climatic event cannot be ascribed to when damping may be required. Instead, the trigger would be visual and relate to excessive dust generation from the access roads being observed during site inspections. Details of dust monitoring are already presenting in the DMP in Section 5 and in the daily log/ housekeeping sheet.

3. Update and resubmit the Odour Management Plan (VAL-LFL-OPS-OMP-PIL-MRF V1.0, dated 16/09/2024) to include the following:

a. Update the title page of the document to the correct permit reference.

This has been updated on the title page of the OMP.

b. The site address and hours of operation.

This is now in Section 2.1 of the OMP.

c. Provide further details of the fixed plant and associated processes being undertaken in the Materials Recycling Facility (MRF).

Details of the fixed plant and processes are provided in the Operating Techniques in detail with the associated process flow diagram detailing the plant. The odour management plan is a live management system document aimed at preventing fugitive emissions of odour. If any process or plant is changed and updated this would mean updating the OMP even though the processes and practices for managing odour from the site would remain the same. Furthermore, no putrescible/ odorous waste is put through any fixed plant or machinery.

d. Provide and attach a map of the sensitive receptors.

Please see Receptor Plan Drawing ST20310-002.

e. Provide and attach a site plan showing monitoring points.

Please find attached Drawing PWS3200, which is included in the odour monitoring plan.



f. Provide details regarding the typical / expected frequency of deliveries and number of vehicles delivering waste each day.

As this MRF will be part of the landfill permit, vehicle movement will not exceed what is already specified in the planning for the Site. Appropriate loads will be directed through the MRF when they meet the waste acceptance procedures.

The variation will not increase deliveries to the site. There will be some additional movements to collect sorted recyclate. This is expected to be no more than 10 movements a day. The traffic statement has been attached for your information.

g. Provide details of contingencies in the case of abnormal events.

We believe the Action Plan provided in the Odour Management Plan provides the contingencies. This outlines the action to be taken if odour is noted beyond the site boundary.

The Schedule 5 asks if operations will cease until the issue is resolved. Odour is likely to be worse when waste is in the MRF over a long period. Therefore, operations should not cease in the case of odour but instead continue ensuring waste is turned over as quickly as possible to reduce site storage times. Once all the waste has been removed from the MRF then site operations may cease if further action, such as plant repairs, are needed to resolve the issue.

Waste containing significant putrescible material will not be directed to the MRF, this will be directly sent to landfill instead, meaning it is unlikely that odorous material shall be present at the MRF.

In the case that an odorous load is accepted at the MRF it will be removed and sent to landfill if appropriate and meets the landfill waste acceptance procedure/criteria. or off site to a suitably permitted facility as soon as possible. Wastes with a strong odour will not be treated (which might release more odour). A sentence to this effect has been added to the Odour Management Plan.

Yours sincerely

for Wardell Armstrong LLP

Alison Cook

Technical Director

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