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| Project details | Environmental Permit Variation Application – EPR HP3638WW/A005 O.C.O Technology Limited – Avonmouth Aggregate Production Facility |
| Applicant details | O.C.O Technology Limited Avonmouth Aggregate Production Facility Off Central Avenue Hallen Avonmouth BS10 7SD |
| Report details | EP Variation Application – Appendix D: Non-Technical Summary Document reference: OCO_2020.03/02_v1 |
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1 Introduction

1.1 General

O.C.O Technology Ltd (the ‘applicant’) has requested that Reva Environmental Ltd (the ‘agent’) prepares an Environmental Permit (EP) variation application, for its aggregate production facility off Central Avenue, Hallen, Avonmouth, BS10 7SD. The centre of the site is as NGR ST 53828 83207.

The facility treats air pollution control (APC) residues to create an aggregate that can be used in block manufacture. This is currently carried out in two production lines which can operate in parallel. APC residues are delivered in powder tankers and transferred into silos, then into a reactor where they are treated with carbon dioxide to lower the pH and reduce the leachability of some heavy metals. The material is then mixed with cement, sand, and water to turn it into pellets. The pellets are stored in covered bays and used to make blocks. Processing is all carried out in a building.

The facility is currently authorised by EP ref. EPR/HP3638WW which was originally granted in September 2015.

1.2 Current Site Status

The current EP allows the following activities to be carried out at the facility:

- 5.3 A(1)(a)(vi) – Disposal or recovery of hazardous waste with a capacity exceeding 10 tonnes per day involving the recycling or reclamation of inorganic materials other than metals or metal compounds (R5). This listed activity applies twice (A1 and A2) to reflect the two production lines and allows the applicant to treat certain hazardous wastes for the purposes of producing pellets; and
- 5.6 A(1)(a) – Temporary storage of hazardous waste with a total capacity exceeding 50 tonnes (R13). The maximum storage capacity is given as 1750 tonnes, and a maximum storage time of 6 months is enforced, from the date of receipt of the waste.

Three directly associated activities (DAAs) are included as follows:

- Handling and storage of wastes, prior to treatment and recovery activities for hazardous wastes;
- Storage of raw materials for use within production lines A1 and A2 – this is limited to 150 tonnes of cement at any one time, 700 tonnes of sand at any one time, and 50 tonnes of carbon dioxide at any one time; and
- Surface water collection and storage (uncontaminated roof and site surface) in two above ground storage tanks for re-use within the facility.

1.3 Application Objective

The applicant wishes to install a third treatment line at the site. The line will be an exact duplicate of the two existing treatment lines, will process the same permitted wastes, and will utilise the same permitted raw materials to produce the aggregate. It will be located to the north of the two existing production lines, within the existing building footprint. It is proposed that the addition is addressed in the EP by way of the following changes:

- Inclusion of the third line as an additional listed activity under S5.3 Part A(1)(a)(vi) in Table S1.1;
- Increase of the total storage limit for hazardous waste specified against AR3 in Table S1.1. The current EP limits storage to 1,750 tonnes of waste at any one time. This is in 8 storage silos. The proposal includes the addition of 4 more storage silos, an increase of 50%. The storage limit is therefore to be increased to 2,625 tonnes. The additional storage silos would be located on a

dedicated pad to the west of the existing silo pad, where the EP currently allows water and CO₂ storage;

- Increase of storage of binder. This is currently permitted in one silo, adjacent to the waste silos, which has a capacity of approximately 125 m³. The proposal includes an additional binder silo to be placed on an extension to the existing silo pad foundation immediately to the south of the existing silo, increasing the total storage capacity to 400 tonnes;
- Increase of storage of filler. This is currently permitted in a storage bay that has a capacity of approximately 400 m³ and two additional bays No.1 and No.2 which have never been used. This application seeks to surrender both the area of the primary storage bay and the unused areas. The currently used bay will become new Aggregate Storage Bay 1 (not covered by the EP as it is a product not a waste) and a new larger bay will be built for filler which will have a capacity of 880 m³ (an overall increase of 480 m³). Any one of the available Aggregate Bays 4 to 7 can also be used for filler storage; noting that only one would be used at any time. This would allow O.C.O to retain sufficient filler for the times when quarries close but the aggregate facility remains open. This is a further 400 m³. This equates to a total filler capacity of 1,280 tonnes (compared to the current permitted limit of 700 tonnes);
- Increase of CO₂ storage. The current EP allows for two tanks although the applicant has only built one; the EP allows total storage of 50 tonnes. The existing tank will be removed and a new pad installed to the east of the process building which can accommodate 2 new tanks. The current storage limit is for 2 tanks so the permitted physical infrastructure will remain unchanged, however the capacity is doubled to 100 tonnes (each tank is 50 tonnes); and
- Inclusion of new emission points in Tables S3.1 for the vents on the four new waste silos, and one new binder silo.

The existing EP boundary comprises four separate areas. Two of these are Additional Sand Bays No.1 and No.2. These have never been used for this purpose. This application seeks to surrender these as a low risk surrender (having never been used for the permitted activity) and includes this by way of completion of application form Part E2 for the partial surrender of the EP. The addition of new silos/tanks, the relocation of the primary filler storage bay, and the moving of the water and CO₂ tanks requires the boundary to be slightly amended.

2 Application Content

A substantial variation application has been made to the EA to vary the existing EP (ref. EPR/HP3638WW/V005) to include the proposed changes above. The application comprises the following documents, in accordance with the EP Regulations and sector guidance notes:

- EP Application Form – Parts A, C2, C3, E2 and F1. The application form is provided at the front of the EP variation application document;
- Supporting Statement. This has been written to provide an explanation of the application to the EA and to provide signposts to the supporting information supplied in accordance with the application form;
- Appendix A - A copy of the pre-application advice provided by the EA, including a statement of the expected content and a habitat screening report;
- Appendix B - A copy of the certificates of technical competence (and continuing competence evidence) for the two proposed Technically Competent Managers;

- Appendix C - A copy of the proposed site layout plan, updated to include the new waste and raw material silos and tanks, define the new EP boundary line, and the location of the third production line;
- Appendix E - An updated environmental risk assessment to take into account the presence of local nature reserves (LNRs) / local wildlife sites (LWSs) within the 2 km screening radius and to reflect improvements made since the original plant was constructed; and
- Appendix F - An updated best available technique (BAT) assessment which builds on the document submitted with the original 2018 application to bring it in line with those for the other applicant facilities and to reflect improvements made since the original plant was constructed.

The ERA concludes that the control measures that are either already in place at the site for the current permitted activities or are proposed to be implemented for the new activities are appropriate.

The BAT Assessment concludes that the nature of the proposed activities is such that emissions are very limited and thus the overall environmental impact of the site is minimal. As the site is operated with the purpose of recovering waste that would otherwise be disposed of, the site is having an overall positive impact on the environment.