

Project details	Environmental Permit Variation Application EPR/LP3241QA Grundon Waste Management Limited – Avonmouth II
Applicant details	Grundon Waste Management Limited Thames House Oxford Road Benson Wallingford Oxfordshire OX10 6LX
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1 Introduction

1.1 General

Grundon Waste Management Limited (the ‘applicant’) has requested that Reva Environmental Ltd (the ‘agent’) prepares an Environmental Permit (EP) variation application, for its Avonmouth MBT Facility at Kings Weston Lane, Avonmouth, Bristol, BS11 9FG.

The facility is currently permitted by EPR/LP3241QA which was originally granted in November 2009 as EPR/EP3590SJ to New Earth Solutions (West) Limited. It was most recently varied (and consolidated) by Variation Notice V007 in October 2015 and has subsequently been transferred in full to Grundon, on 18 January 2023.

The MBT Facility takes up an area of land that sits alongside another for which Grundon is also the current permit holder. The interaction between the MBT Facility EP boundary and the Energy Facility (the EfW) is shown on the site plan in the current EP for the MBT Facility and is re-presented in **Figure NTS1** below. The site that is subject to this variation application is being reconfigured and developed as ‘Avonmouth II Waste Treatment and Transfer Station’ (WTTS).

Figure NTS1: EP Boundary



This non-technical summary provides an overview of the application.

The current EP (EPR/LP3241QA) allows the following:

- Activity A1, Section 5.4 Part A(1)(b)(i) “recovery or a mix of recovery and disposal of non-hazardous waste with a capacity exceeding 75 tonnes per day involving biological treatment”.

The permitted activity covers the entire plant from the receipt of waste to the despatch for other on-site operations and/or recovery of by-products. In this case on-site operations are described as being limited to aerobic composting, anaerobic digestion and/or bio-drying.

It also includes the following Directly Associated Activities (DAAs):

- Activity A2, storage of waste pending recovery;
- Activity A3, physical treatment for the purposes of recycling. This is limited to screening, crushing, baling, shredding, and pelletising, and pasteurisation of waste in a single tank, and gas cleaning by biological or chemical scrubbing;

- Activity A4, surface water collection and storage of uncontaminated roof and site surface water in an attenuation pond for re-use or discharge off-site;
- Activity A5, raw material storage
- Activity A6, collection and storage of compost like output (CLO); and
- Activity A7, collection and storage of process water (compost leachate) for recovery/disposal off-site.

A copy of the existing EP is provided in **Appendix A** of this EP variation application; this comprises the 2015 Variation Notice and the 2023 Transfer Notice.

1.2 Application Objective

The applicant wishes to vary the permit to reflect the proposed operation as a hazardous and non-hazardous waste transfer station that can feed the majority of the blended, repackaged, bulked and/or shredded waste into the proposed adjacent HTI.

There is no requirement to increase the existing EP boundary to accommodate the new activities, however the building layout will be subject to minor changes. The site layout plan has been amended to present the proposed activities and is provided in **Appendix E** of this variation application.

The application being made is considered to fall under the definition of a substantial variation. The reason for this is that it adds new listed activities. It also seeks to remove a number of existing activities and amend the limits on several. A comprehensive list of the activities proposed to be included on the varied permit (a consolidation of new, amended, existing) is provided, as follows:

- **New Listed Activity (Activity A1).** There will be a shredder that will be used for the processing of both hazardous and non-hazardous waste. This new listed activity is for the shredding of hazardous waste which falls under Section 5.3 Part A(1)(a)(ii), physico-chemical treatment of greater than 10 tonnes per day for disposal or recovery.
- **New Listed Activity (Activity A2).** There will be a manual blending activity whereby incoming waste will be mixed (different EWC codes). This new listed activity is for the blending of hazardous waste which falls under Section 5.3 Part A(1)(a)(iii), blending or mixing prior to submission to any of the other activities listed in Section 5.3 or 5.1 greater than 10 tonnes per day for disposal or recovery.
- **New Listed Activity (Activity A3).** There will be a manual bulking activity whereby incoming waste will be bulked (same EWC codes). This new listed activity is for the bulking of hazardous waste which falls under Section 5.3 Part A(1)(a)(iv), repackaging prior to submission to any of the other activities listed in Section 5.3 or 5.1 greater than 10 tonnes per day, for disposal or recovery.
- **New Listed Activity (Activity A4).** The storage of hazardous waste, which falls under Section 5.6 Part A(1)(a), the temporary storage of hazardous waste with a capacity exceeding 50 tonnes pending any activity listed in Sections 5.1, 5.2, and 5.3.
- **New Listed Activity (Activity A5).** This new listed activity is for the treatment of waste in the vacuum battery shredding/recycling unit, which falls under Section 5.3 Part A(1)(a)(ii), physico-chemical treatment of greater than 10 tonnes per day for disposal or recovery.
- **New Listed Activity (Activity A6).** There will be a de-packaging unit that will be used to crush small packages containing liquids, enabling the recovery of the liquid contents (bulked) and the containers (crushed plastic/metal/other). This activity is for the processing of hazardous waste pending transfer of the residues off site and will operate to a capacity exceeding 10 tonnes per day so falls under Section 5.3 Part A(1)(a)(ii), physico-chemical treatment of greater than 10 tonnes per day for disposal or recovery.

- **New Waste Operation (Activity A7).** This new Waste Operation is for the blending and/or bulking of non-hazardous waste less than 50 tonnes per day. It is the non-hazardous counterpart to new Activities A2 and A3 above.
- **New Waste Operation (Activity A8).** This new Waste Operation is for the blending and/or bulking of non-hazardous waste as a pre-treatment for incineration less than 75 tonnes per day.
- **New Waste Operation (Activity A9).** This new Waste Operation is for the shredding of non-hazardous waste less than 50 tonnes per day pending disposal. It is the non-hazardous counterpart to new Activity A1 above.
- **New Waste Operation (Activity A10).** This new Waste Operation is for the shredding of non-hazardous waste as a pre-treatment for incineration, less than 75 tonnes per day.
- **New Waste Operation (Activity A11).** The de-packaging unit will be used for the processing of non-hazardous waste pending transfer off site for disposal/recovery. This will operate to a capacity of less than 75 tpd so is not a listed activity. It is the non-hazardous counterpart to new Activity A6 above.
- **Existing Directly Associated Activity (Activity A12).** Storage of non-hazardous waste pending recovery. This is the activity currently included as A2 in the existing permit.
- **Existing Directly Associated Activity (Activity A13).** Surface water collection in a tank and transfer off site. This is the activity currently included as A4 in the existing permit.
- **Existing Directly Associated Activity (Activity A14).** Storage of raw materials. This is the activity currently included as A5 in the existing permit.
- **New Directly Associated Activity (Activity A15).** Management of wash water (process water from the cleaning of waste containers as part of the repackaging activities).

2 Application Contents

The content of the application has been guided by EA guidance on permitting. Conservation screening has been carried out the by EA following a request for pre-application advice by the applicant.

The application comprises the following documents.

- EP Application Form – Parts A, C2, C3, C4 and F1. The application form is provided at the front of the EP application document.
- Supporting Statement (ref. GR_2023.02/01). 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.
- A copy of the existing EP for the facility (Appendix A).
- A copy of the EA's pre-application conservation screening advice (Appendix B).
- Demonstration of technical competence by the applicant / EP holder for those managing the operations (Appendix C). Technical competence is currently demonstrated through the EU skills scheme.
- A summary of the environmental management system (EMS) (Appendix D). The applicant operates its existing permitted facilities in accordance with a formal integrated management system which is certified by BSi to ISO 14001 for environmental management. The applicant also holds certification for PAS 99 (integrated management), ISO 9001 (quality management), ISO

45001 (occupational health and safety management), ISO 50001 (energy management), and CMS (competence management system scheme).

- A set of site plans detailing the location of the site, the layout of equipment and processes (including waste storage and emission points), drainage arrangements, and site setting in relation to sensitive receptors (Appendix E).
- A Fire Prevention Plan (FPP) detailing the fire prevention provisions, and fire-fighting equipment, along with management of fires (Appendix G).
- A copy of the baseline report and supporting remediation reports (Appendix H).
- A qualitative environmental risk assessment (ERA) ref. GR_2023.02/04 (Appendix I). This is for not just the proposed new activities, but the whole facility including those activities already permitted. This follows the EA's source-pathway-receptor methodology to identify potential risks and assess the potential impacts of those risks following implementation of suitable control/mitigation measures. It incorporates assessment of the habitat sites identified in the pre-application conservation screening (Appendix B of this variation application).
- A spreadsheet detailing the wastes permitted for each activity or group of activities. Ref. GR_2023.02/05 (Appendix J).
- A Best Available Techniques (BAT) Assessment ref. GR_2023.02/06 (Appendix K). This describes the proposed activities and demonstrates that it accords with the suggested measures in sector guidance (EPR 5.06) and in Healthcare Waste: Appropriate Measures guidance.
- An Odour Management Plan (OMP) ref. GR_2023.02/07 (Appendix L). This identifies the potential odour sources, sensitive receptors, the pathways between the two, and mitigation measures in place to minimise the risk of odour release.