



Non-Technical Summary for a New Bespoke Waste Operation

Site name: New Hall Farm Paper Drying Plant
Site address: New Hall Farm, Sunnyslack, Broughton Moor, Maryport, CA15 7RL
Operator name: Robert Skelton Contractors Limited
Permit reference: EPR/EP3922SL
Document ref: SPC0130/Skelton/NTS/V1.0 May 24

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1 Introduction

This Non-Technical Summary has been prepared by Shann Pitts Consulting Limited (SPC) on behalf of Robert Skelton Contractors Limited, the Operator, to support a permit application for a bespoke waste operation environmental permit for the treatment of non-hazardous waste namely the drying of paper sludge to produce animal bedding at New Hall Farm Paper Drying Plant, New Hall Farm, Sunnyslack, Broughton Moor, Maryport, CA15 7RL herein termed 'the Site'.

The application has been prepared by SPC in conjunction with and on behalf of the Operator.

A nature and heritage conservation screening report was requested from the Environment Agency with respect to this new permit application (Reference EPR/EP3922SL/P001).

A full Environmental Risk Assessment has been carried out and is provided as a supporting document to the permit application.¹ This Non-Technical Summary highlights the key control measures that will be employed to minimise any impacts from the operational site and signposts the reader to the key supporting documents.

2 Site & Process Overview

2.1 Site Location

Address: New Hall Farm Paper Drying Plant, New Hall Farm, Sunnyslack, Broughton Moor, Maryport, CA15 7RL

National Grid Reference: NY 06347 34442

Local Authority: Cumberland Council

2.2 Process Description

See Appendix B – Process Flow Diagram.

The operation is a waste treatment activity namely the drying of waste from pulp, paper and cardboard production herein termed 'paper sludges' to produce a dried material suitable for animal bedding.

The waste treatment activity constitutes the drying of wet paper sludge waste from paper mills on up to 4 No. drying floors utilising waste heat from 4 No. biomass boilers (which are operated under a Part B permit from Allerdale Borough Council, ref: PPC/ABC/B/26) on site. Since 1 April 2023 Allerdale is now part of Cumberland Council Unitary Authority. It is proposed to dry up to 11,000 tonnes per annum of wet paper.

Under normal operating conditions, only three of the drying floors will be used. The fourth drying floor has been included within the permit boundary and permit application such that it can be used as a contingency if there are any issues with individual boilers and / or drying floors.

The dried paper may be blended with sawdust (produced on site) to produce a material suitable for animal bedding or alternatively sold as a pure dried paper product.

¹ Appendix A of EMS Manual (SKE-OD-01), V1.0, May 2024

In addition to the main waste treatment activity, there is associated waste storage prior to and after the waste treatment (drying).

Emissions to land and water are primarily controlled via storage of the 'wet' paper sludge on an impermeable surface which drains to a sealed drainage system.

There are no point source emissions to air. Fugitive emissions of dust are controlled by the fact that the drying floors are inside the buildings. Dust is further minimised through the appropriate storage of the dried paper sludge within bays in a building and by the covering of all waste loads in transit.

2.3 Infrastructure

The infrastructure includes:

- Tarmac haul road (900m)
- Weighbridge
- Office
- Building containing:
 - 4 No. Drying floors
 - 2 No. Dry paper storage bays
- Covered yard containing:
 - Wet paper sludge storage pile with drainage to a sealed sump
- Quarantine bay
- 2 No. 7,000 litre water storage tanks for fire and dust suppression
- Surface water drainage system to on-site clean water lagoon (which can also be used for fire water supply and fire water containment)

The site layout is shown on the Paper Drying Layout Plan and the Whole Site Layout (Appendix A).

2.4 Planning Permission

Planning permission for the development was granted by Allerdale Borough Council; planning permission references are FUL/2020/0032 and FUL/2020/0094.

2.5 Permit Type

The activity is classed as a waste operation as there are no proposed listed activities in accordance with Schedule 1 of the Environmental Permitting Regulations 2016.

The permit will be 'bespoke' by virtue of the fact that the proposed activities i.e. treatment of non-hazardous waste is not included in any Standard Rules permits.

2.6 Waste Activities

The Operator will not undertake any waste management activity unless it is specifically listed in Table 1 below:

Table 1: Permitted Activities

Description of activities	Limits of activities
R13: Storage of wastes pending any of the operations numbered R3	Treatment of non-hazardous waste through drying.
R3: Recycling/reclamation of organic substances which are not used as solvents	Storage of 'wet' paper sludge (non-hazardous waste) on an impermeable pavement undercover with sealed drainage. Storage of 'dry' paper sludge (non-hazardous waste) including blended products on an impermeable pavement in a building.

2.7 Waste Type

The single waste type accepted for treatment has the following European Waste Catalogue code and description as shown in Table 2 below:

Table 2: Waste Type

Waste	Description
03	WASTES FROM WOOD PROCESSING AND THE PRODUCTION OF PANELS AND FURNITURE, PULP, PAPER AND CARDBOARD
03 03	wastes from pulp, paper and cardboard production and processing
03 03 05	de-inking sludges from paper recycling

The waste type is an absolute non-hazardous waste in accordance with the List of Waste (England) Regulations 2005.²

2.8 Waste Properties

The 'wet' paper sludge has a dry matter content of in the range of 60-65%. The 'dry' paper sludge has a dry matter content of approximately 95%.

2.9 Waste Quantity

The maximum treatment capacity of the plant is in the region of 30 tonnes per day across 4 No. drying floors. The maximum annual tonnage of waste will be 11,000 tonnes.

The maximum pile sizes and tonnages of wet and dry paper are detailed in Table 4 of the EMS Manual (**SKE-OD-01**) and in Section 7 of the Fire Prevention Plan (**SKE-OD-02**).

² <http://www.legislation.gov.uk/ukxi/2005/895/contents/made> Accessed 19th March 2024

3 Key Sensitivities

The site is outside any:

- Groundwater Source Protection Zone
- Drinking Water Safeguard Zone
- Drinking Water Protected Area³

The site is within an area designated as medium – low groundwater vulnerability.

The Sepulchre Beck runs approximately 110m to the south east of the proposed site boundary. This waterbody is within the Ellen (lower) Water Body which under the Water Framework Directive was classified as having a poor ecological status in 2019 and 2022.⁴

The site is within flood zone 1 has a low probability of flooding from rivers and the sea.⁵

The site is outside any Air Quality Management Areas.⁶

In response to a request for pre-application heritage and nature conservation screening (Ref: EPR/EP3922SL/P001 / Date:15/01/24), the Environment Agency confirmed that no habitats and/or protected species were identified that needed to be considered in the permit application.⁷

Human receptors within 1km of the site are shown in Table 3 below and on the Human Receptor (1km) Plan.

Table 3: Human Receptors (1km)

Receptor ID	Receptor name	Receptor type	Distance to site boundary (m)	Direction from site
H1	Harker Marsh houses	Residential	215	North west west
H2	Harker Marsh houses	Residential	225	North north west
H3	Florence House Adult Daycare Centre	Amenity / Workplace	545	North east
H4	Craika Road houses	Residential	515	North
H5	Shepherd Hall	Residential	560	South east
H6	North east of Broughton Moor	Residential	935	South west west

³ <https://magic.defra.gov.uk/MagicMap.aspx> Accessed 12 February 2024

⁴ <https://environment.data.gov.uk/catchment-planning/WaterBody/GB112075073640> Accessed 26 February 2024

⁵ <https://flood-map-for-planning.service.gov.uk/> Accessed 12 February 2024

⁶ <https://uk-air.defra.gov.uk/aqma/maps/> Accessed 19 March 2024

⁷ Heritage and Nature Conservation Screening Report, EPR/EP3922SL/P001, Environment Agency, 15/01/24

Receptor ID	Receptor name	Receptor type	Distance to site boundary (m)	Direction from site
H7	Crooklands Farm	Residential	920	North west
H8	Fox House	Residential	960	South south east
H9	Moorside Farm	Residential	955	North north west
H10	Houses on Seaton Road	Residential	925	South west

The Operator and family live in houses within close proximity to the site are not classified as sensitive receptors in terms of amenity impacts and for that reason are not included in the table above.

4 Management

4.1 Management system

The site will be operated by Robert Skelton Contractors Limited in accordance with the Environmental Management System which includes the documents detailed in Table 4 below which are relevant to operational control:

Table 4: Management System Documents

Document reference	Document title
Overarching documents	
SKE-OD-01	Environmental Management System Manual
SKE-OD-02	Fire Prevention Plan
SKE-OD-03	Dust Management Plan
Standard Operating Procedures	
SKE-SOP-01	Waste Acceptance & Rejection Procedure
SKE-SOP-02	Waste Handling & Management Procedure
SKE-SOP-03	Spillage Procedure
SKE-SOP-04	Fire Procedure
Monitoring and / or Maintenance Schedule	
SKE-MP-01	Daily Checks
SKE-MP-02	Weekly Checks
Form templates	
SKE-FT-01	Accident & Incident Report Form
SKE-FT-02	Complaints Record Form
SKE-FT-03	Temperature Monitoring Log Form

The relevant documents have been submitted to support this permit application:

- EMS Manual (**SKE-OD-01**)
- Fire Prevention Plan (**SKE-OD-02**)
- Dust Management Plan (**SKE-OD-03**)

4.2 Technical competence

Kathryn Clark is the Technically Competent Manager (TCM) for the regulated facility as detailed in Part B2 of the application form. On the 24 January 2024 she was issued an Environmental Permitting Operator's Certificate (EPOC). She is enrolled and in the process of attaining MROC1 award with

WAMITAB which is a Level 4 Medium Risk Operator Competence for Non-Hazardous Waste Treatment and Transfer.

The Operator may train or employ further TCMs; the Environment Agency will be notified in this instance.

The Site will be supervised by the TCM for at least 15% of operational hours or otherwise as agreed with the Environment Agency. This minimum attendance requirement has been calculated in accordance with the online Environment Agency guidance 'Legal Operator and Competence Requirements: Environmental Permits'⁸.using the Site Operational Risk Appraisal (OPRA) score and banding as submitted with the permit variation and transfer application, which this EMS accompanies.

The minimum attendance requirement calculation is shown in Table 5 below:

Table 5: TCM Minimum Attendance Requirement Calculation

Aspect	OPRA category	Associated points
Complexity (waste operation)	A	1
Location	B	2
Emissions	B	2
		TOTAL = 5 points which equates to 15% minimum attendance

The TCMs will sign /out of the Site diary each time he/she attends Site.

4.3 Roles & Responsibilities

The TCM is responsible for:

- Ensuring that operational and TCM attendance hours are recorded;
- Carrying out site checks with respect to environmental and health and safety controls;
- Duty of care checks for waste loads entering and leaving the site;
- Relevant training for staff;
- Ensuring that incidents, accidents and complaints are recorded, reported as appropriate and actioned; and
- Maintenance of fire extinguishers and fixed electrics.

The Site Manager, Stuart Skelton has overall responsibility for the regulated facility and line manages the Site Foreman.

The Site Foreman and Site Manager carry out day to day tasks including:

- Daily Checks **(SKE-MP-01)** & Weekly Checks **(SKE-MP-02)**
- Waste Acceptance (including waste rejection if appropriate) **(SKE-SOP-01)**
- Loading of drying floors using first in – first out principle **(SKE-SOP-02)**

⁸ <https://www.gov.uk/guidance/legal-operator-and-competence-requirements-environmental-permits>

Accessed 20 March 2024

- Checking of drying floors **(SKE-SOP-02)**
- Removal of dried material **(SKE-SOP-02)**
- Blending of products as required
- Loading of material for dispatch using first in – first out principle **(SKE-SOP-02)**
- Overseeing maintenance of mobile plant and recording
- Maintenance of drying floors and recording
- Housekeeping tasks including sweeping yard.

5 Control of Emissions to Land and Water

5.1 Fuels and Chemicals

There are oils and fuels within the telehandler and vehicles delivering and dispatching waste. Diesel for use in the mobile plant is stored in a bunded tank outside the permitted area. There is no chemical storage associated with this regulated facility.

5.2 Drainage

There are no emissions to water from the site.

There is very little run off from the wet paper sludge storage area as it is undercover and the waste doesn't generally leach. However, to contain any leachate that may arise the area drains to a container with a submersible pump in it. The level in the tank is checked weekly and if it is approaching full the container is pumped out to a tanker and the liquid is spread to land.

The dried paper storage bays benefit from an impermeable surface and are inside a building; there is no risk of runoff from these areas during normal operations.

All other areas where there is no waste storage or treatment, are designated as clean and discharge to the adjacent clay lined lagoon. When the lagoon is full it overflows to the Sepulchre Beck. The discharge to the beck can be blocked off to retain water on site. This is included within the Spillage Procedure **(SKE-SOP-03)** and the Fire Procedure **(SKE-SOP-04)**.

5.3 Spillages

The site is checked at least daily for any spillages (Daily Checks **SKE-MP-01**) and any spillages are cleared up as soon as possible and in accordance with the Spillage Procedure **(SKE-SOP-03)**.

6 Control of Emissions to Air

There are no point source emissions to air. See Section 8.1 Control of Dust.

7 Fire Prevention

The permit application is supported by a Fire Prevention Plan (**SKE-OD-02**) written using the template and guidance provided by the Environment Agency.⁹

Wet paper sludge will be stored against a fire resistant concrete panel wall in a single pile with a 6m separation distance around the other sides for a maximum of a week. Dry paper is stored in 2 No. dedicated bays with fire resistant concrete panel walls and will be stored for up to 1 month. Dry paper stored for longer than 2 weeks will be temperature monitored to minimise self- combustion risk.

There are no sources of ignition on site in proximity to the waste storage. Fire watches will be carried out at the beginning, middle and end of the day; Daily Checks (**SKE-MP-01**). The telehandler is stored away from the waste storage areas when not in use overnight.

The site is manned throughout the day, checked at night by the Site Manager who lives onsite and benefits from a CCTV camera system with remote access and an alarm system to detect movement out of hours. In terms of fire suppression, there are serviced fire extinguishers throughout the site and ample water supplies on site; 2 No. 7,000 litre tanks with extendable hoses and a large clay lined clean water lagoon. The lagoon may also be used to retain fire water as required in accordance with the Fire Procedure (**SKE-SOP-04**).

⁹ <https://www.gov.uk/government/publications/fire-prevention-plans-environmental-permits> Accessed 22 May 2024

8 Control of Amenity Impacts

8.1 Dust

8.1.1 Existing controls

All loads of paper sludge coming in and out of the Site are in enclosed or covered vehicles. All vehicle movements including access to the Site from the highway is on hardstanding or concrete. The access road and site are swept as necessary which acts to minimise dust being raised from vehicle movements.

Dust is controlled during the waste treatment process as the drying floors are inside the building and the doors to the individual drying floors can be closed.

Dried paper sludge is stored in bays which are only open at the front and loaded in a building thus reducing the risk of windblown dust arising from waste storage and handling.

There is a site speed limit of 5 miles per hour.

8.1.2 Monitoring & Additional Controls

Dust is monitored daily at the site boundary downwind; Daily Checks **(SKE-MP-01)**. This frequency will be increased in dry conditions.

If dust is detected then the yard and / or access road will be dampened down using a hose. Dust will then be monitored for again and further dampening down will be carried out as necessary. If dampening down is not found to be effective the operation creating dust will be temporarily halted until effective corrective action has been taken.

All of these control measures can be found in the Dust Management Plan (DMP) **(SKE-OD-03)**¹⁰ that supports this permit application. Staff training will be provided on the DMP. The DMP and proposed control measures will be revised and improved if required.

8.2 Control of Noise & Vibration

The potential sources of noise and vibration from the permitted operation and associated controls are:

1. Vehicles delivering 'wet' paper to the Site and collecting dried paper sludge.
2. Vehicles moving around the Site e.g. loading or unloading the drying floors
 - All vehicles used at the Site are maintained in good efficient working order.
 - Machines in intermittent use are shut down or throttled down in the intervening periods when not in use or throttled down to a minimum.

The drying floors themselves are not a source of noise. The biomass boilers are regulated by the local council under a Part B permit.

All vehicles coming to site are told to contact site before arriving and are directed in via the Heavy Good Vehicles (HGV) access to the south west of the site and not through Harker Marsh village. All

¹⁰ Dust Management Plan (SKE-OD-03), V1.0, May 2024

vehicles except one dispatching dried paper are operator owned and all use the dedicated HGV route to the south west of the site.

There are approximately 5 HGV movements per day and there is an enforced site speed limit of 5 miles per hour. Noise is monitored daily; Daily Checks (**SKE-MP-01**). If noise and or vibration is found to have an impact on the local amenity then a Noise and Vibration Management Plan will be written and actioned.

8.3 Control of Mud

There is the potential for mud to be tracked out of the Site by vehicles although this is a low risk as all vehicle movements including access to the Site from the highway is on concrete or hardstanding. The hard standing track for HGV access is approximately 900m long and regularly maintained. The yard is checked daily and swept if required. In the unlikely event that there is mud on the road a yard sweeper belonging to the farm will be used.

8.4 Control of Pests & Scavengers

It is unlikely that the waste types will attract pests or scavengers. A local pest control company make regular visits to site to check and reduce any pests or vermin. Records of the visits are kept in the Site Office.

8.5 Control of Litter

Due to the nature of the waste being treated, litter associated with the permitted activities is not anticipated. The Environmental Risk Assessment (Appendix A of the EMS Manual (**SKE-OD-01**)) concludes that the overall risk of litter impacting the local human population, livestock and wildlife is low.

Any litter arising will be detected during Daily Checks (**SKE-MP-01**). All waste will be stored securely and disposed of appropriately.

8.6 Control of Odour

The permitted waste types, waste acceptance and waste rejection procedures act to restrict the acceptance of odorous waste into the Site. Whilst the wet paper sludge may be odorous, it is stored within a building. The odour potential of the waste treatment activity is limited due to the drying floors being inside a building. The closest sensitive receptors to the site are houses in Harker Marsh 215m north west of the Site. The Environmental Risk Assessment (Appendix A of the EMS Manual (**SKE-OD-01**)) concludes that as a result of these factors that the overall risk of odour impacting the local human population is low.

The Operator confirms that there have not been any complaints about odour from the Site.

Odour is monitored daily; Daily Checks (**SKE-MP-01**). If odour is detected off-site or if notified by the Environment Agency that the activities are giving rise to pollution outside the Site due to odour, the Operator will submit to the Environment Agency for approval within the period specified, an odour management plan which identifies and minimises the risks of pollution from odour and implement the approved odour management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.

Appendix A – Site Plans

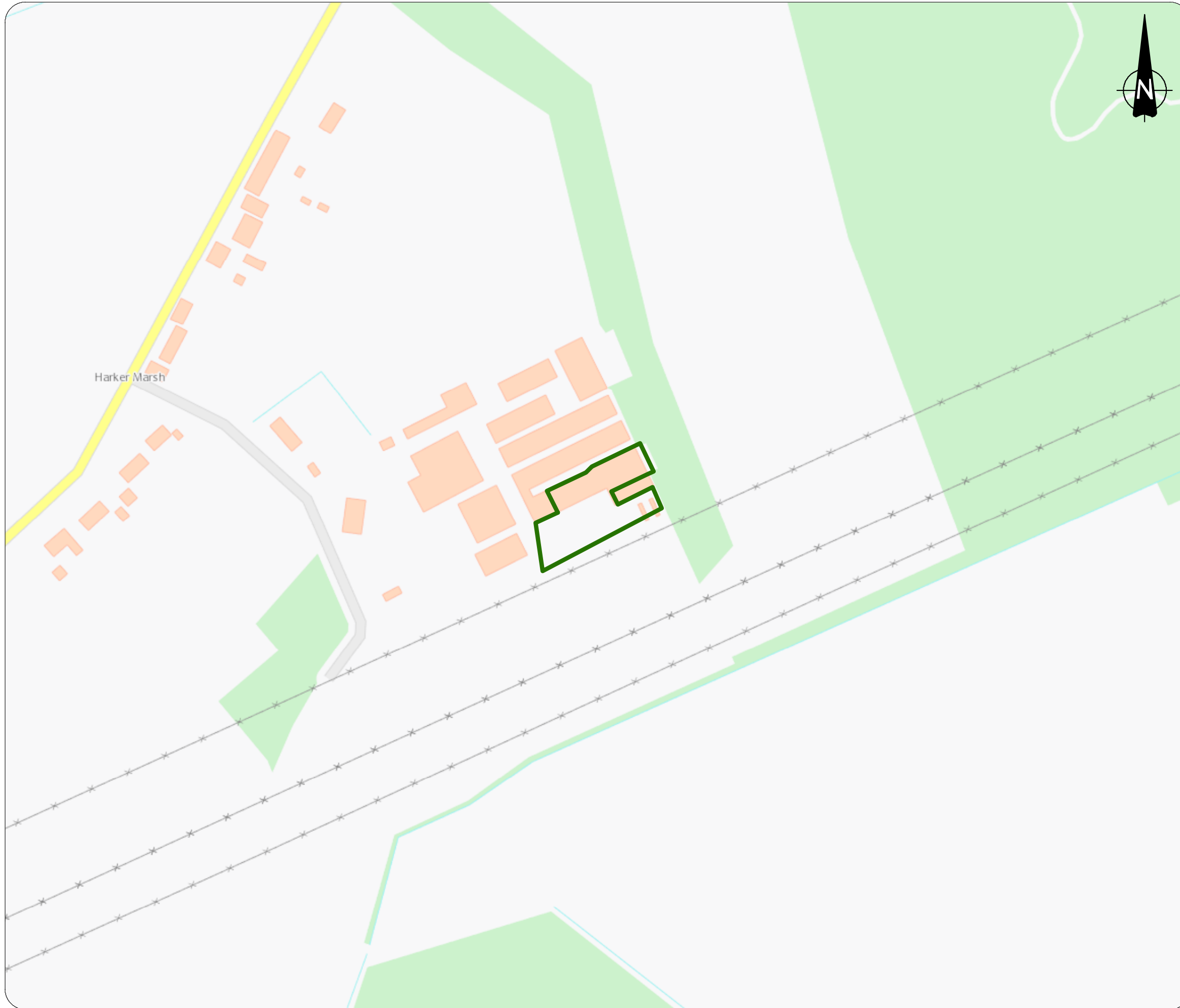
Site Location Plan (SPC0130/LocationPlan/Rev A)

Permitted Boundary Plan (SPC0130/BoundaryPlan/Rev A)

Human Receptor (1km) Plan (SPC0130/HumanReceptor(1km)/Rev A)


Whole Site Layout Plan, V1,0 May 2024

Paper Drying Layout Plan, V1.0 May 2024



REVISIONS					
REV	DATE	DESCRIPTION	DWN	CHK	APP
A	11/05 2024	First Issue	JJ	ESP	ESP

LEGEND

 Permit Boundary

0 50 100 m
Scale at A3: 1:2,500

Client Robert Skelton Contractors Limited
Project New Hall Farm Paper Drying Plant Permit Application
Title Site Location Plan


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Date May 2024	Scale 1:2,500	Sheet Size A3	
Drawing Number SPC0130/LocationPlan/Rev A		File Reference SPC130.mxd	



REVISIONS					
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A	11/05 2024	First Issue	JJ	ESP	ESP

LEGEND

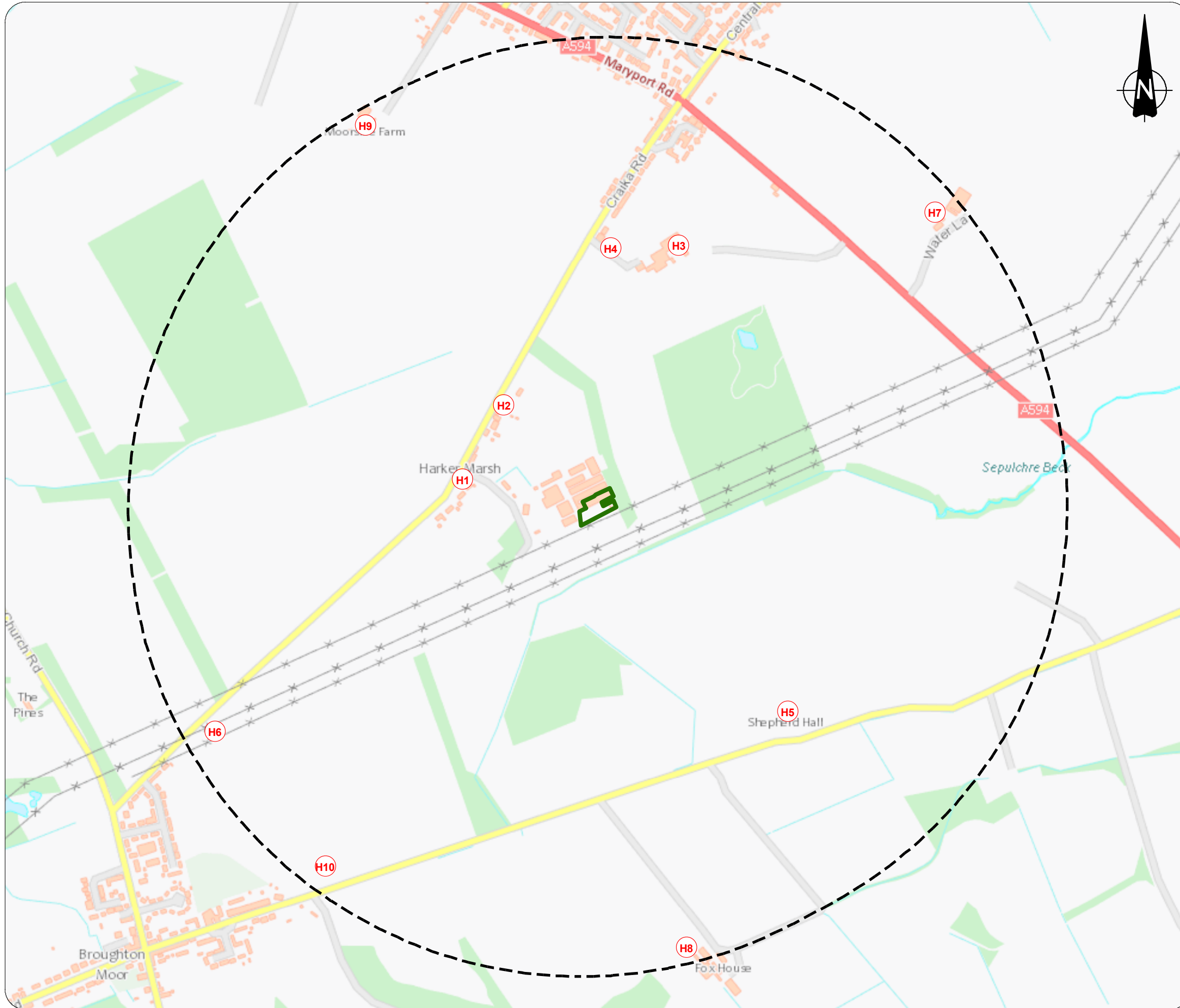
 Permit Boundary

0 10 20 m
Scale at A3: 1:500

Client Robert Skelton Contractors Limited
Project New Hall Farm Paper Drying Plant Permit Application
Title Permitted Boundary Plan


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Drawn JS	Checked ESP	Approved ESP	Revision A
Date May 2024	Scale 1:500	Sheet Size A3	
Drawing Number SPC0130/BoundaryPlan/Rev A		File Reference SPC130.mxd	



REVISIONS					
REV	DATE	DESCRIPTION	DWN	CHK	APP
A	11/05 2024	First Issue	JJ	ESP	ESP

LEGEND

- Permit Boundary
- Permit Boundary 1km Buffer
- Human Receptor

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Scale at A3: 1:8,500

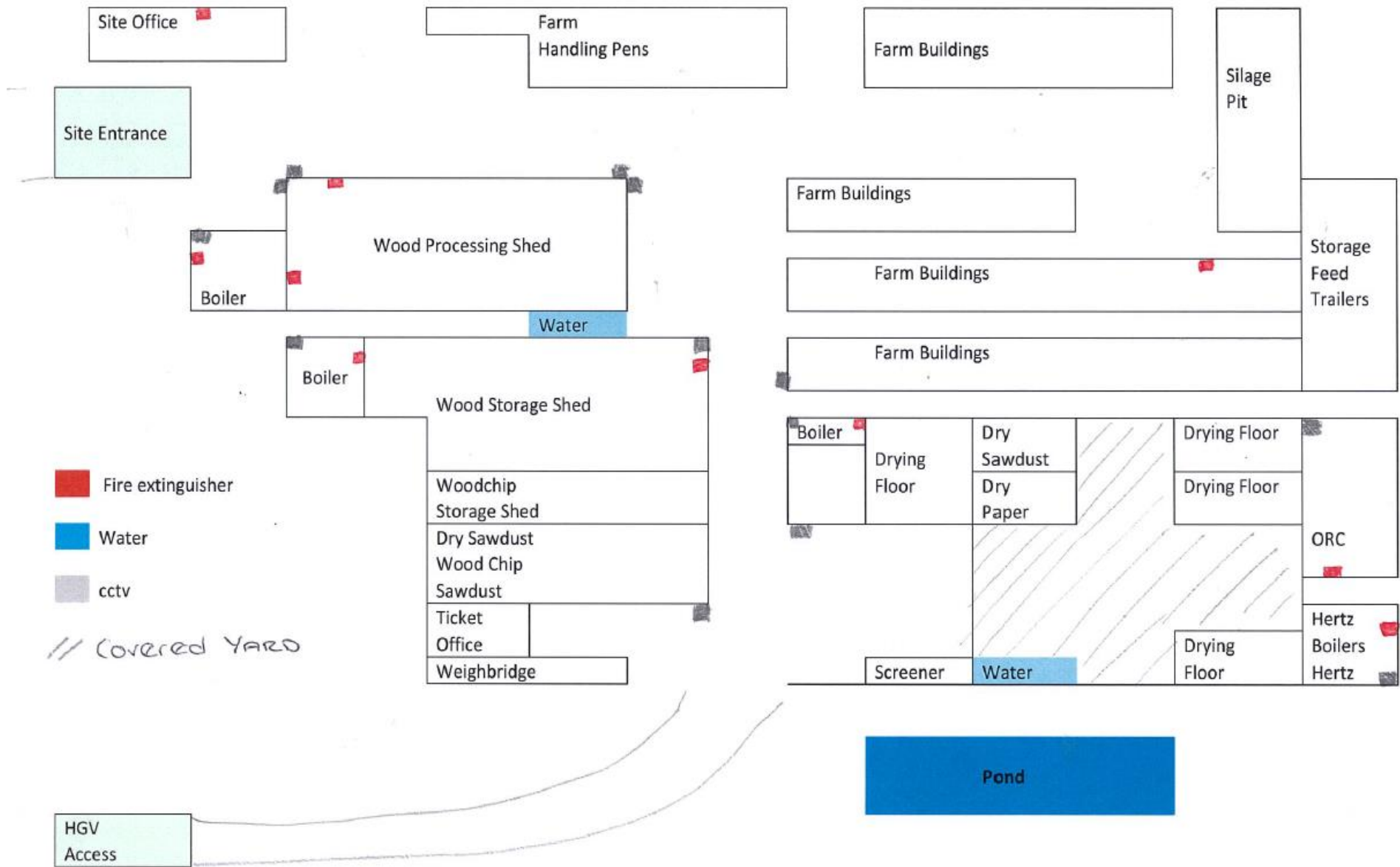
Client Robert Skelton Contractors Limited
Project New Hall Farm Paper Drying Plant Permit Application
Title Human Receptors Plan

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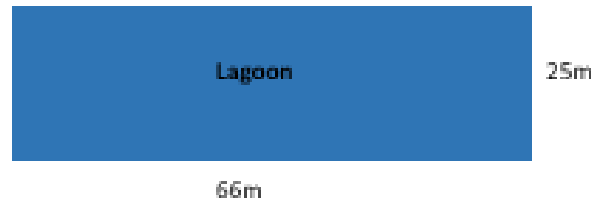
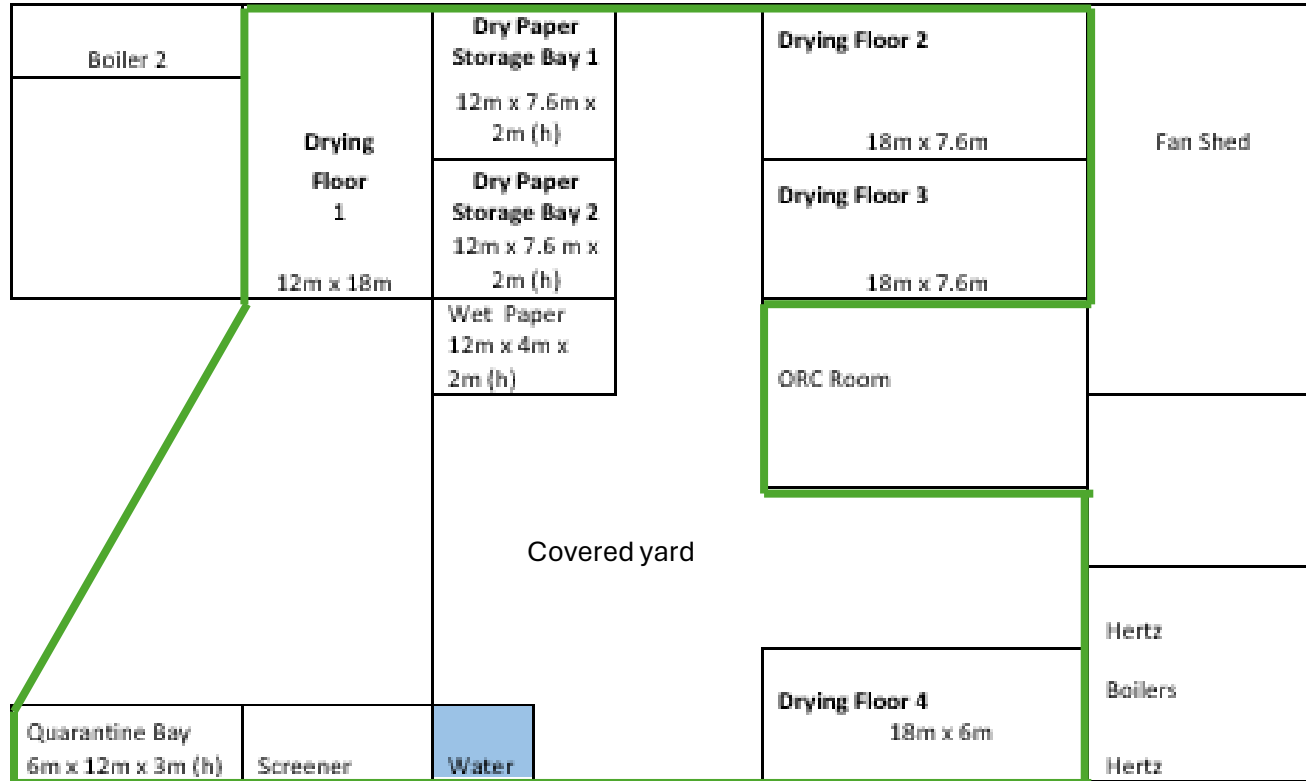
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Drawing Number SPC0130HumanReceptor(1km)Rev A			File Reference SPC130.mxd

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New Hall Farm Paper Drying Plant – Whole Site Layout Plan, V1.0, May 2024



New Hall Farm Paper Drying Plant - Paper Layout Plan, V1.0, May 2024



Permitted area

Appendix B – Process Flow Diagram

New Hall Farm Paper Drying Plant, Process Flow Diagram, V1.0 May 2024

