

PERMIT VARIATION – NON TECHNICAL SUMMARY

The following Non-Technical Summary provides a detailed but simplistic overview of the proposed Variation to the existing Permit HP3299VV V005 at Hangar 25, Causewayhead, Silloth, Cumbria, CA7 4PE.

The following activities currently fall under the active permit

A1 - HCl waste transfer station with treatment <75,000t (with codes 10 13 13, 10 13 12*, 19 02 03, 19 02 04*)

A2 - composting in closed systems (in-vessel composting) <5,000t

A3 - blending and mixing of Bypass dusts <16,000t

A4 - biological treatment in closed systems (in-vessel composting) of organic fines <20,000t

A5 - composting in open windrow systems (treatment of organic fraction of road sweepings) <20,000t

This permit was approved over 3 years ago now, and as the business has evolved and demand for our services grown it is now time to vary the permit once again.

Theoretically, this is a vary simple variation in that all we require is to increase the annual tonnage of the A4 activity to 70,000t per year and remove/surrender activity A3 (mixing and blending). All other operations and activities are to remain exactly the same.

This means that we are proposing the following to exist on the revised permit:

A1 - HCl waste transfer station with treatment <75,000t (with codes 10 13 13, 10 13 12*, 19 02 03, 19 02 04*)

A2 - composting in closed systems (in-vessel composting) <5,000t

A4 - biological treatment in closed systems (in-vessel composting) of organic fines <70,000t

A5 - composting in open windrow systems (treatment of organic fraction of road sweepings) <20,000t

After discussions with Gareth Rogerson, it was also agreed that when applying for this application we use change the associated business name from Agriorganics, to its parent company Millers Contracting Ltd. This is due to Agriorganics being a dormant company and has been completed on the 20th Dec 18.

A brief summary of all activities and how they relate to actual operations at the hangar are below.

-A1 - HCl waste transfer station with treatment <75,000t (with codes 10 13 13, 10 13 12*, 19 02 03, 19 02 04*)

Hangar 26 is predominantly used as storage of materials that fall under the A1 activity. This storage falls under the R13 code and in most cases is storage prior recovery to land R10. Some examples of this is coffee grounds and bypass dust. This activity is useful for us in that it allows us to store materials inside, under cover, and out of the elements prior to their recovery. The obvious advantages to this are over the winter periods.

We also have the ability to mechanically treat materials should they require screening before going to our landspreading operations.

To date the most common material accepted under the A1 activity is Bypass dust/cement kiln dust, a lime fertilizer substitute (10 13 12*, 19 02 04*) This is stored on site prior to landspreading operations throughout Cumbria under mobile plant no.4 landspreading permits.

We are happy with the A1 activity as it currently appears on our permit and do not require this to change.

A2 - composting in closed systems (in-vessel composting) <5,000t

To date, we have not utilized this activity. It allows us to treat a list of various wastes within our In Vessel Composting facility in hangar 25, up to 5000t per year. Instead, we have focused our efforts on the composting of organic fines (19 12 12) under activity A4. Despite this though, we would like to keep this on the permit as it gives us flexibility should the organic fines reduce.

A3 - blending and mixing of Bypass dusts <16,000t – REMOVAL/SURRENDER

This was included on our last variation as, at the time, we had an 'End of Waste' application submitted which if successful would have allowed us to mix and blend MBM ash with Bypass dust, to create a compound fertilizer 0-12-12. By having this operation in place we would have been the only legal site in the country to actually combine the two together so it made perfect sense at the time.

Despite our best efforts though, the EoW application was unsuccessful so this activity can be removed. It is my understanding that this technically needs to be surrendered so an E2 form will be completed. I must stress though that this activity never materialized there is nothing physical to surrender here, or any impacts or infrastructure in place.

A4 - biological treatment in closed systems (in-vessel composting) of organic fines <70,000t

The current activity is running very well and as such we are requesting to increase our upper limit of treatment from 20,000t to 70,000t. This is the maximum that our facility in its current state can process in one year as currently it is under utilized.

We are aware that applying for such an increase in tonnages pushes the aggregate treatment to over 75t/day and therefor falls under an installation activity.

Our current permit also allows us to mechanically and physically sort and screen the material prior to treatment which we will still require.

Briefly, the process involves the IVC treatment of the organic fraction of fines from both Mechanical/Biological and just Mechanic treatment plants throughout the UK. The fines are from Municipal non-source segregated wastes.

Our EMS outlines a detailed acceptance criteria and the process in more detail.

In a nutshell however, our IVC facility meets the technical standards and is approved as a facility for processing Catering Wastes Animal By-Products, as defined by the Animal By-Products (Enforcement)(England) Regulations 2011 and EC Regulation (EC) No 142 / 2011. We are operating 8 tunnels with the ability to sanitise the material of E-Coli and Salmonella. The operation has been highly successful and we have a good working relationship with Animal health (now called Animal and Plant Health Agency) and are consistently showing positive results.

Once treated to the accepted standard the sanitised material is left to mature and stabilise before being sent to restoration outlets as a compost like output. We have learnt through experience that 2 months is what is required to achieve 'stability' levels in line with PAS100 which is 16 mgCO₂/gV/d.

We are happy with this activity and how it is worded on the current permit. Other than the tonnage increase, we would like this to stay the same.

A5 - composting in open windrow systems (treatment of organic fraction of road sweepings) <20,000t

Under this activity we have approval to mechanically process and treat Road Sweepings. These are imported into the facility under activity A1 (Waste transfer station) coded as 20 03 03. The material is tipped to the outside rear of hangar 25, whereby a fully concreted and bunded area has been built. The bund connects to a 250gallon underground tank.

We mechanically screen or separate the material into 3 separate fractions using a 10-14mm trommel screen – Litter, Grit and Organic fraction for recovery and recycling purposes. We open Windrow Compost (aerobic treatment) the biodegradable fraction of the Sweepings under its new coding of 19 12 12 under the A5 activity and send to restoration outlets.

Again, we are not requiring anything to be changed here and would like the wording and activity to remain as it currently is on the permit.

The litter is sent back to the waste producer to either go to landfill, or to be refined further for RDF purposes.

The Grits and stone will be used under exemptions for use of waste in construction. Predominantly farm tracks.

I hope this is a satisfactory document in that I didn't want it to overcomplicate things, and not going into too much detail as this will all be found within the new EMS that will be submitted with the application.