

# NON-TECHNICAL SUMMARY

## I Introduction

JH WILLIS & SON, has instructed 360 Environmental Ltd to prepare a permit application for the proposed liquid waste transfer and treatment site at Holme Farm under the Environmental Permitting (England and Wales) Regulations 2016 (as amended).

The Environment Agency (EA) application forms require a non-technical summary to be submitted in support of any variation to an environmental permit, and includes the following:

- an explanation of exactly what is being applied for;
- a summary of the regulated facility; and
- a summary of the key technical standards and control measures arising from the risk assessment.

This Non-Technical Summary should be read in conjunction with the rest of this application which contains:

- Application Forms A, B2, B4, F1
- Supporting Information
- Operating Techniques Document
- Environmental Risk Assessment.

JH WILLIS & SON are not making a claim for commercial or industrial confidentiality for any part of this variation application, although it is requested that Appendix I – Business Information is not placed upon the public register due to potential security of identity issues.

The operation will effectively comprise of two Standard Rules (the former SR2008\_No19 and current SR2010\_No17) permits taking place at the same site, but are not able to comply with the requirements for the following reasons;

- Proximity to a SSSI (Mersey Estuary)
- Wastes, other than treated sludges, will be stored together as a mixed waste
- Proximity to a workplace or dwelling

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## 2 The proposed site

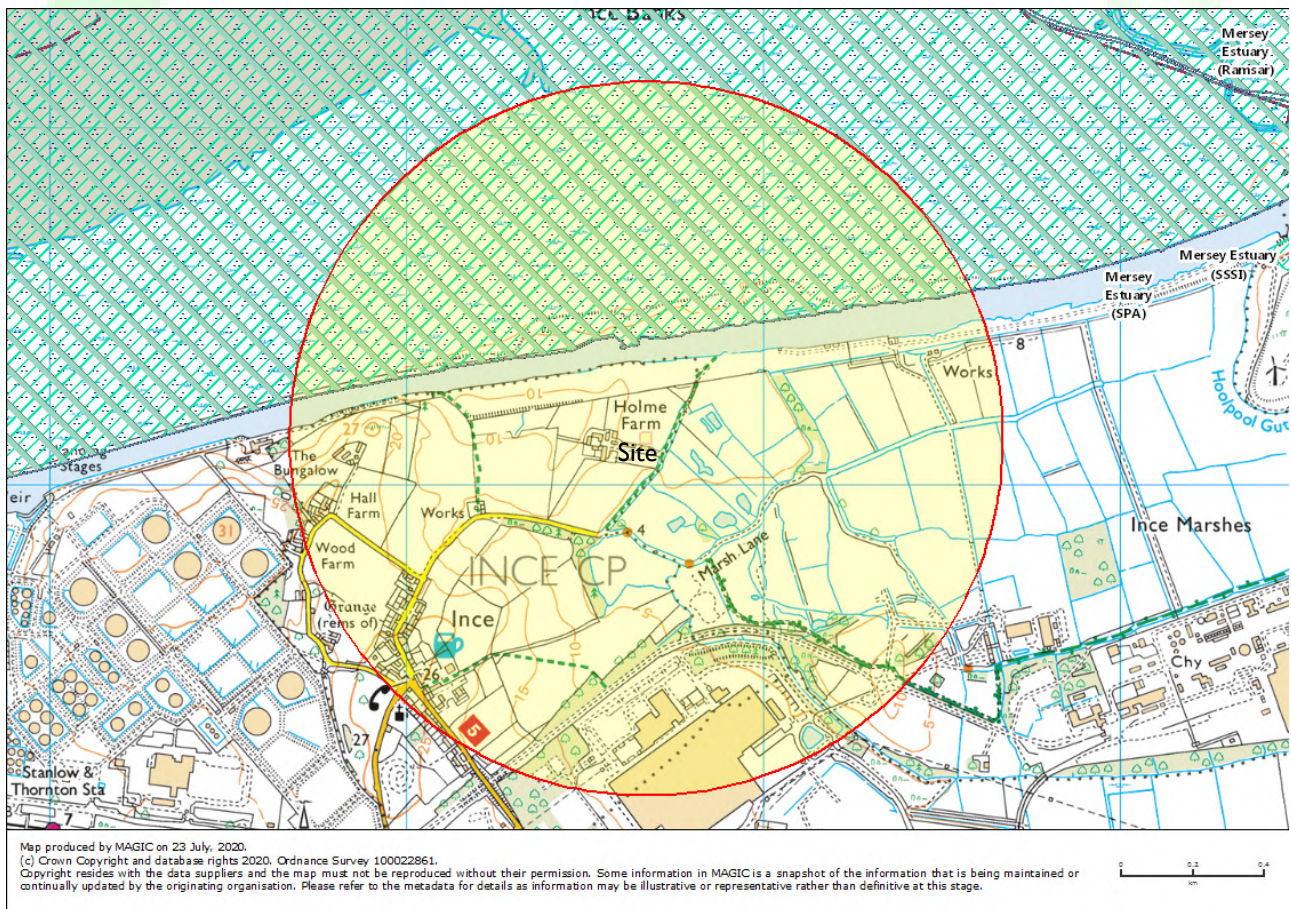
The site is to be located at Holme Farm (SJ 45700 77129) and is to replace the two liquid waste storage lagoons adjacent. The liquid waste storage lagoons are being decommissioned as part of the port facility expansion with the area to be designated as 'mitigation land'.

The site is in a rural location and surrounded by land farmed by the Willis'. It is accessed via a private lane, via a security gate, from the public highway from Ince. It is located within the main agricultural holding and surrounded by large farm buildings and a large above ground slurry store.

The site lies approximately 275 m to the south of the Mersey Estuary (SSSI/SPA/RAMSAR).

The centre of the village of Ince is situated approximately [REDACTED] south west of the site.

The location of the site is shown in the following map with a 1 000 m radius circle applied.



The site does not lie within a groundwater source protection area and there are no surface waters across the site. The site is bunded to prevent any liquids entering the nearby surface water system.

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### 3 Summary of permitted waste types and proposed activities

The proposed site will store liquid wastes for temporary storage prior to application to deployed land, it is intended that the wastes will be stored individually or mixed for operational purposes only.

Wastes will only be mixed to ease handling and spreading of the waste under the same deployment. Where the wastes are mixed and stored before use this will not be for treatment purposes. There should be no change in composition to the waste, for example significant changes in pH and metals availability. Any mixing will not cause wastes to react and will not pose a risk to human health or the environment. The stored wastes will remain appropriately mixed for the duration of the storage operation to ensure even application to the receiving land, for example: the avoidance of striping across crops.

The actual application rates for mixtures of waste will be based on the ratio of each individual waste stream, or the waste stream with the highest nutrient, Potentially Toxic Element (PTE) or other limiting parameter will be used as the maximum application rate allowed to be spread, i.e. the waste will be spread at the lowest application rate.

These wastes streams will not be subjected to any treatment operation and will be listed in Appendix 8 and reflect those contained in the Standard Rules SR2008\_No19 permit and the current Environment Agency Regulatory Position Statement RPS231.

A large part of the business is the collection of sludges from private treatment such as package treatment plants or septic tanks. These sludges are collected and then taken to waste water treatment works, however due to restricted operating hours at WWTW these makes collections difficult, especially in flooding situations. This waste operation will be subjected to a treatment operation and the waste streams will be listed in Appendix 8 and reflect those contained in the former Standard Rules SR2010\_No17 permit.

The proposal is that the sludge collections would be able to either be;

- Temporarily stored at the site prior to despatch to WWTW for treatment, or
- Treated at the site, by the lime stabilisation of liquid sludge, i.e., addition of lime to raise pH to above 12 for at least 2 hours. The sludge would then be applied to land under the Sludge (Use in Agriculture) (SUiAR) Regulations 1989\*.

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*\*Where these Regulations are replaced, the sludge will be applied to land under deployment, or whatever future mechanism is put in place to control this method of application.*

The activities that will be carried out at the site as defined under Annex II of the Waste Framework Directive can be summarised as follows:

- R3: Recycling or reclamation of organic substances which are not used as solvents;
- R13: Storage of wastes pending recovery by land treatment
- D15: Storage pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where it is produced).

### 4 Operating Techniques

The site will be operated in accordance with the Operating Techniques document which has been drafted to satisfy the requirements of Environment Agency Guidance, 'and details the following:

- management;
- site operations;
- emissions and monitoring; and
- Information.

Operational management procedures will ensure that:

- the risks that the activities pose to the environment are identified;
- the measures that are required to minimise the risks are identified;
- the activities are managed in accordance with the management system and operating techniques document;
- performance against the management system is audited at regular intervals; and
- compliance with the environmental permit.

The risk management and mitigation measures employed at the site and identified in the environmental risk assessment are detailed in the sites operating techniques document.

In summary, the rules and operating procedures employed at the site will ensure the following with respect to the specified waste management activities:

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- All waste treatment and storage will take place on concrete impermeable pavement provided with sealed drainage;
- Concrete impermeable surfacing throughout the site and falls towards the drainage channels means that no potentially contaminated runoff from the site can enter the nearby watercourse or soak in to the ground;
- All potentially polluting liquid wastes will be stored in above ground tanks on an impervious base and surrounded by impervious bund walls;
- Clean surface runoff from roofs, or areas not used in connection with storing and treating waste will be separately managed;
- Strict waste acceptance procedures will be adhered to ensure only permitted wastes are accepted on site;
- The site manager will ensure that regular inspections are made of the site. If necessary, remedial measures will be arranged as soon as possible.

### **5 Assessments**

#### ***Environmental risk assessment***

An environmental risk assessment (ERA) has been carried out to assess the environmental risk posed by the proposed variation to the activity. There are no point source emissions to land, air, surface or groundwater from the proposed facility.

The proposed facility will have drainage infrastructure in place at the site so that all potentially contaminated site drainage is captured and directed via a sealed system, consisting of concrete impermeable pavement across the site with falls towards the main drain channel that captures all liquids and directs it to a sealed tank.

Operational procedures at the site will monitor and manage amenity and accident risks from the proposed activities and includes provision for the monitoring of odour, noise, and fugitive emissions. The impact of the proposed development on surrounding human and environmental receptors has been assessed in the ERA.

As the management measures detailed in the risk assessment are currently in place the conclusion has been reached that the proposed waste materials and treatment activities, are unlikely to result in a

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significant accident risk or risk to the local environment, including from odour and noise, or pollution of surface or ground waters.

### **6 Site Condition Report**

A Site Condition Report (SCR) has been prepared as part of this application as the proposed site will be undertaken on a new site.

The proposed facility will operate with due regard to the conditions of the environmental permit and all relevant environmental legislation to ensure that land and groundwater is protected during the lifetime of the site and that the land is in a satisfactory state when the permit is eventually surrendered.

The possibility of any significant releases to the ground [REDACTED] during the lifetime of the permit is therefore limited. All waste will be stored and treated on [REDACTED] impermeable concrete to eliminate direct potential pathways to soil and groundwater. Minor spillages, if they occur, are dealt with immediately by trained staff using appropriate spill response procedure and spill kits located around the site. The impermeable concrete site surfacing will locally break any potential pathway for contaminants that could be emitted from the permitted activities to land or groundwater.

Odour and ammonia issues will not impact upon the nearby SSSI (Mersey Estuary) as the liquid wastes will be treated in an enclosed process.

### **7 Operating Techniques Document**

The site will be operated in accordance with the management system and the operating procedures for the site. These documents are drafted to satisfy the requirements of the permit and ensure environmental protection at all times and detail the following:

- management;
- site operations;
- emissions and monitoring; and
- information.

Operational management procedures will ensure that:

- the risks that the activities pose to the environment are identified;
- the measures that are required to minimise the risks are identified;

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- the activities are managed in accordance with the management system and operating techniques document;
- performance against the management system is audited at regular intervals; and
- compliance with the environmental permit.

The risk management and mitigation measures employed at the site and identified in the environmental risk assessment are detailed in the sites operating procedures document.

In summary, the rules and operating procedures employed at the site will ensure the following with respect to the waste management activities:

- All waste management operations will only take place within the permit boundary that is provided with impermeable pavement with drainage to a sealed tank;
- Concrete impermeable surfacing covers all areas of the site and falls towards the tank so that no potentially contaminated runoff from the site can enter groundwater;
- Strict waste acceptance procedures will be adhered to, to ensure only permitted wastes are accepted on site;
- There will be no storage of potentially combustible waste;
- The site manager will ensure that regular inspections are made of the site. If necessary, remedial measures will be arranged as soon as possible.

### **8 Conclusion**

The overall conclusion of the studies undertaken in support of this bespoke environmental permit application for a liquid waste storage and treatment facility at Holme Farm, Ince is that there is unlikely to be a significant environmental impact.

JH WILLIS & SON are fully committed to ensuring the highest standards are met and will undertake their activities in a manner consistent with best industrial practices and in accordance with the company's environmental management system.

*This document has been prepared by 360 Environmental Limited with reasonable skill, care and diligence, and taking account of the manpower, timescales and resources devoted to it by agreement with JH WILLIS & SON (the Client) as part or all of the services it has been appointed by the Client to carry out. It is subject to the terms and conditions of that appointment.*