

Response to EA Request for Further Information

Environmental Permitting (England and Wales) Regulations 2016

Application reference: EPR/JB3005CJ/V003

Operator: CHESHIRE WEST RECYCLING LIMITED

Facility: C W & C Canalside Operations Hub, Dockyard Road, Ellesmere Port, CH65 4EF

Form Part C4:

Table 2- Emissions:

- **Please confirm whether all surface water run-off that drains to either surface water drains, or the Manchester Ship Canal are clean and uncontaminated.**

Surface water generated across the Canalside site comprises predominantly uncontaminated rainfall falling onto roofs and external hardstanding areas.

The site has been designed and is operated to minimise the potential for contamination of surface water. Waste handling and storage activities are undertaken on impermeable hardstanding, with operational controls implemented to prevent contamination of clean surface water.

Rainfall that falls onto uncontaminated areas of the site and does not come into contact with waste is considered clean surface water.

Areas where there is the potential for contamination, including the vehicle wash area, are drained via the site's interceptor and 2 available separator systems prior to discharge.

Operational controls including good housekeeping, prompt clearance of spillages, routine inspections and preventative maintenance of the drainage infrastructure are implemented to minimise the potential for contamination of surface water.

Based on the site's operational design and management controls, Cheshire West Recycling Ltd does not consider that routine uncontaminated surface water discharged from the site constitutes contaminated trade effluent requiring a separate Water Discharge Activity permit.

If you consider it clean and uncontaminated please confirm whether this is because it is rainfall that has:

- **a) not run through any waste,**
- **(b) it has run through waste but has been treated.**

Confirm the method of treatment prior to discharge.

Reason: There is potential a Water Discharge Activity could be required if run-off has been contaminated.

The Canalside Operations Hub has been designed to segregate clean surface water from areas where there is the potential for contamination.

The majority of surface water discharged from the site comprises uncontaminated rainfall that has not come into contact with waste materials.

The principal external storage area for processed cardboard, baled recyclable materials and clean untreated wood is fully covered. As these materials are stored beneath a permanent roof structure, rainfall is prevented from coming into contact with the stored wastes, thereby minimising the potential for contamination of surface water.

As part of the proposed permit variation, the external storage areas for food waste, road sweepings and garden waste will also be fully covered with plans already in progress.

Any leachate or contaminated run-off arising from these operational areas is directed to the site's drainage system incorporating an interceptor and 2 separator systems.

The proposed hazardous waste transfer area is located on an impermeable surfaced area that drains to the site's interceptor and separator system. Hazardous wastes will be stored in suitable containers, under cover where appropriate, and managed in accordance with the site's Waste Acceptance Procedures and Environmental Management System to minimise the potential for contamination of surface water.

Accordingly:

- Rainfall falling on uncontaminated areas of the site is considered clean surface water because it has not come into contact with waste.
- Areas with the potential to generate contaminated run-off are either covered to prevent rainfall ingress or drain via the site's interceptor and separator system.
- Cheshire West Recycling Ltd does not intentionally discharge contaminated surface water to the surface water system or the Manchester Ship Canal.

Based on the site design, the proposed engineering improvements and the operational controls implemented, Cheshire West Recycling Ltd considers that a separate Water

Discharge Activity is not required for routine uncontaminated surface water arising from the site.

Table 3a – Please confirm you will agree to comply with the relevant parts of the Appropriate Measures (AMs) on WEEE, WTEE, and Chemicals.

Reason: You have only listed the Non-hazardous and inert AMs.

Cheshire West Recycling Ltd confirms that the Canalside Operations Hub will comply with the relevant parts of the Environment Agency's Appropriate Measures applicable to the proposed permitted activities.

In addition to the Non-hazardous and Inert Waste Appropriate Measures already identified within Table 3a, the Site will comply, where applicable, with the Appropriate Measures for:

- Waste Electrical and Electronic Equipment (WEEE);
- Waste Toner and Electrical Equipment (WTEE), where relevant to the accepted waste streams; and
- Chemicals and Hazardous Waste.

The Site's Environmental Management System, Waste Acceptance Procedures, Dust and Emissions Management Plan, Odour Management Plan and operational procedures have been developed to reflect these Appropriate Measures and will be implemented throughout the operation of the facility.

Q5a). Site Condition Report (SCR):

- **Drainage:**
 - **Check the map reflects the drainage arrangement of the proposed site.**
 - **Clarify what wastes are stored and treated in the various drainage areas of the site, and hence potential for pollution to drain to either interceptor, surface water sewer, foul sewer, or any surface water run-off.**



Please see Appendix 15 Site Drainage Plan –

Following review of the Environment Agency's comments, Appendix 15 (Drainage Plan) has been revised to improve the clarity of the site's drainage infrastructure. The revised drawing more clearly identifies the drainage network, drainage runs, manholes, separators and the direction of drainage flow across the Site.

The revised drainage plan is intended to accurately represent the site's drainage arrangements. A separate revised Site Layout Plan has been prepared to identify the proposed operational areas and waste storage locations associated with the substantial variation.

The Site drainage infrastructure includes the following separators:

Separator (INT1)

The **Separator (INT1)** is located on the eastern side of the Site adjacent to the main operational building. This separator receives drainage from:

- the vehicle wash area; and
- the proposed hazardous waste transfer area.

The hazardous waste transfer area will comprise an impermeable surfaced area where hazardous wastes are received, inspected, temporarily stored in suitable containers and a fully cover zap shelter and transferred off site.



Separator (INT2)

The **Separator (INT2)** is located adjacent to Dock Yard Road on the southern boundary of the Site. This separator receives drainage from storage areas for:

- food waste.
- garden waste; and
- road sweepings.

These storage areas will be covered within the given time frame in accordance with the Regulation 61 response, significantly reducing rainfall ingress. Any leachate or contaminated run-off arising from these areas will drain via the site's separator system.

Impass Separator

The Impass Separator is located on the north-eastern section of the Site and forms part of the wider surface water drainage network, providing additional protection against hydrocarbon contamination associated with vehicle movements.

The separators form one element of the site's pollution prevention strategy and are not relied upon as the sole means of pollution control. Pollution prevention is achieved through a combination of engineering and operational controls including:

- impermeable hardstanding.
- covered storage of food waste, garden waste and road sweepings.
- containerised storage of hazardous wastes.
- routine housekeeping.
- prompt clean-up of spillages.
- regular inspection and maintenance of the drainage infrastructure; and
- implementation of the Site Environmental Management System.

Drainage Area	Waste / Activity	Drainage
INT1	Vehicle wash	Separator INT1
INT1	Hazardous Waste Transfer Area	Separator INT1
INT2	Food Waste (covered)	Forecourt Separator
INT2	Garden Waste (covered)	Forecourt Separator
INT2	Road Sweepings (covered)	Forecourt Separator
Covered cardboard, baled recyclables and clean untreated wood	Dry, non-putrescible materials under permanent cover	Rainfall excluded from contact with waste

Q6a) Non-Technical summary (NTS)

- **Explain how the increased throughput will be achieved (e.g. more machinery, increased hours, etc) and which activity/ies this covers (MRF, Hazardous Waste Transfer, both).**

The proposed increase in throughput will be achieved through the implementation of a two-shift working pattern, the provision of additional plant and equipment, and increased covered storage capacity.

The site will operate two shifts between 06:00 and 22:00, Monday to Sunday, as follows:

- Shift 1: 06:00 to 14:00
- Shift 2: 14:00 to 22:00

To support the increased throughput, the following additional plant and infrastructure have been provided:

- Two additional forklift trucks (FLT's);
- One clamp truck.
- Two loading shovels.
- Five additional covered storage bays to improve waste segregation and storage capacity; and
- Five roll-on/roll-off (RoRo) containers and four additional vehicles to facilitate the efficient storage and transfer of waste.

These operational improvements will enable the site to receive, store, handle and transfer increased quantities of waste in a safe and efficient manner.

The proposed increase in throughput applies to the Hazardous Waste Transfer Station activity. The increased capacity is required to ensure continuity of service for the Household Waste Recycling Centre (HWRC) and Street care operations. All hazardous wastes accepted under this activity will be stored pending transfer to appropriately permitted facilities for recovery or disposal. No treatment of hazardous waste will be undertaken on site.

Confirm that no new wastes are to be associated with the MRF activity.

No new waste types are proposed to be accepted under the existing Materials Recycling Facility activity.

The wastes accepted under the MRF will remain unchanged from those currently authorised by the permit.

Confirm current and proposed maximum tonnages.

The current existing annual throughput: 55,000 tonnes per annum

New proposed annual throughput: 120,000 tonnes per annum

Confirm whether the amount stored onsite at any one time will increase.

The current environmental permit allows a maximum aggregate storage capacity of **1,785 m³** of waste on site at any one time.

As part of this permit variation, the site boundary is being extended to incorporate the activities currently undertaken under the **S1 and S2 waste exemptions** into the Environmental Permit. This will allow the exemptions to be surrendered and all waste management activities to be regulated under a single environmental permit.

To support the proposed increase in annual throughput from **55,000 tonnes per annum to 120,000 tonnes per annum**, and to provide sufficient storage capacity for the receipt, segregation, baling and transfer of recyclable and hazardous wastes, the maximum storage capacity on site will increase to approximately **6,040 m³**.

The proposed storage capacity is summarised below:

Storage Area	Proposed Storage Capacity (m³)
Existing permitted storage	1,785
Fibre/Wood storage bays (5 bays)	2,000
Bale storage area	1,280
Hazardous Waste Transfer Station storage area	700
Five 40-yard RoRo containers	153
Four 40-yard RoRo containers	122
Total Proposed Storage Capacity	6,040 m³

The increase in storage capacity reflects the additional infrastructure required to accommodate the expanded range of permitted waste activities, improve segregation of waste streams, and provide adequate storage pending transfer to appropriately permitted recovery or disposal facilities. Waste will continue to be stored in designated areas in accordance with the Fire Prevention Plan and site management procedures, ensuring appropriate separation distances, access for firefighting and compliance with permit conditions

Clarify whether the new hazardous and non-hazardous wastes to be accepted under the permit under the new Hazardous Waste Transfer station activity are for:

- **treatment or transfer.**
- **if any are for treatment please confirm which wastes are affected and what treatment they will be subjected to.**
- **Clarify what, if any other mechanical treatment is (to be) done on the existing permitted wastes.**

All newly proposed hazardous and non-hazardous wastes will be received, inspected, stored, bulked where appropriate and transferred off site to suitably permitted facilities.

No treatment will be undertaken.

All documents requested by the Environment Agency have been reviewed and updated as necessary to address the comments raised. The revised application documents have been amended to ensure consistency and provide the additional information requested. We trust the enclosed revisions satisfy the outstanding requirements for determination of the application.

For and behalf of Cheshire West Recycling Limited

Louise Burns TechMCIWM

HSEQ Manager