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HILL DEMOLITION LLP

# APPLICATION TO VARY AN ENVIRONMENTAL PERMIT

Non-Technical Summary Reference: HDLLP-NTS-01

# Version 1 Dated August 2024

Hill Demolition LLP

t/a Hill Metal Recycling Ltd.

1-3, Edinburgh Place

Harlow

CM20 2DJ

# DOCUMENT CONTROL SHEET

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**1 INTRODUCTION**

Hill Demolition LLP is applying to the Environment Agency to vary its existing environmental permit at the following site:

# 1-3, Edinburgh Way, Harlow CM20 2DJ.

The National Grid Reference for the site is TL 46120 11886 [access to site].

The site is in an industrial estate with other waste and transport activities.

The site is located in Harlow Council’s area.

Hill Demolition LLP has been in operation for over 50 years and 20 years from this address handling hazardous and non-hazardous wastes generated locally. During the operational period of the site no complaints have been received and the site has been managed compliantly with the regulator’s requirements.

Hill Demolition LLP operates a fleet of HGVs used to transport construction and demolition and commercial and industrial wastes. The waste will be delivered to the site and stored as shown in the site layout drawing.

This application is to vary the existing bespoke environmental permit to; i) increase the annual permitted tonnage to 125,000; ii) to add a limited number of liquid wastes to the permitted activities; and iii) add a limited number of additional solid hazardous wastes.

The waste streams applied for are considered to be generated by the operator’s own and others’ activities and often sub-contracted out. This application will enable the operator’s activities to not only reduce whole-life emissions (road-use CO2 and similar) but increase the recovery/reuse/recycling of waste by minimising the requirement for landfill.

The existing environmental risk assessment has been reviewed and the review did not identify any additional hazards or risks to the environment or human health from the proposed additional wastes.

# **2 THE OPERATOR**

Hill Demolition LLP has been operating for over 50 years.

The company’s systems and procedures are audited and certified under ISO14001 for all activities.

In addition, the company also operates to ISO9001 and ISO45001.

The company has an Operating Licence for 6 HGVs. The Operating Centre is at the existing Harlow facility.

Hill Demolition LLP operate a fleet of HGVs used in the collection and transportation of construction, demolition and excavation waste and other commercial and industrial wastes.

The vehicle types are skip lorries, rollonoff lorries and bulk transport vehicles. Additional 2 and 3 axle tanker vehicles will be added upon the successful determination of this application.

The additional waste types that form part of this application are related to the company’s existing demolition operations and include items such as removal and recycling of tarmac and tank emptying when demolishing or dismantling buildings.

All treatment processes will follow the requirements of the Waste Framework Directive and the waste hierarchy of minimising waste disposed of to landfill.

**3 WASTE MANAGEMENT PROCESSES - SUMMARY**

The operator will continue to operate in accordance with its existing policies and procedures, under ISO14001 and the EMS that covers the waste management aspects of the ISO14001 accreditation.

Operations and controls will continue to be based on the regulator’s guidance ‘Chemical waste: Appropriate Measures for permitted facilities. See document HDLLP/Part C2/2b list of waste for summary of waste classifications and site activities.

Hazardous and non-hazardous wastes will continue to be received and stored separately at site, see figures 1 and 2 below.

Solid wastes will continue to have separate storage and processing areas within the site, as shown on the site layout drawing HDLLP/PartC4/3a.

Liquid wastes will be stored in one of two storage tanks on site; hazardous liquid waste in Tank 1, non-hazardous liquid waste will be stored in Tank 2 and sewage/septic tank waste will be stored in tank 3, as shown on the site layout drawing HDLLP/PartC2/5a.

Each of the 3 tanks will have a capacity of 21,000 litres. All tanks are located within a bunded area with capacity, as an absolute minimum, for greater than 125% of the largest individual tank, as shown on the site layout drawing.

Hill Demolition LLP currently employs >20 staff.

The Transport Manager and Technically Competent Person(s) are permanently based at the site; see document HDLLP/PartA/5b; organogram.

The site will be staffed whenever the site is open by staff with training and operational experience from the existing management team.

Document Part C2/2bi confirms the application’s additional waste types, storage and any treatment activities and guidance notes, as summarised below: **Storage and treatment** [crushing & screening] of inert wastes; WRAP Protocol quality

* **Storag**e [in tanks] of non-hazardous liquid wastes [cess pit emptying]
* **Storage** **and treatment** [separation of light and heavy ferrous metals, cleaning of non-ferrous metals] of non-hazardous wastes
* **Storage and treatment** [crushing & screening] of hazardous wastes [bitumen waste with coal tar]
* **Storage** [in tanks] of hazardous liquid wastes [interceptor emptying]

This operation will achieve 100% recycling, ensuring the waste is recycled/reused/recovered with the exception of asbestos which requires landfill disposal for safe management.

The annual throughput will not exceed 125,000 tonnes per annum.

Figure 1 – Process Flow Diagram dry waste

transferred off-site

Incoming waste

**Hazardous & Inert Aggregate-based Waste Storage / Treatment**

**other**

**Stockpile inert wastes**

**Process of crushing & screening aggregate-based waste**

**6F5**

**6F2**

**Type 1**

**Other**

**Crusher run**

**Residual**

**wastes**

**Waste hierarchy**

**considered.**

**D&R options for**

**residues**

**Stockpile hazardous wastes**

**Cold Recycled Bound Material**

Figure 2 – Process Flow Diagram wet waste

transferred off-site

Incoming waste

**Hazardous & Non-Hazardous Liquid Wastes Storage / Treatment**

**other**

**Tank storage non-hazardous wastes**

**Process of storing liquid waste in separate tanks**

**Transfer of cleaned waste water waste will be by discharge to foul water sewer under TEDC for treatment at STW**

**Tank storage hazardous wastes**

**Grit**

**Oil**

**Transfer of solid and oil waste will be for recovery off-site by specialist contractors compliant with waste hierarchy**

# **4 OPENING HOURS**

The operational hours for the site will be:

Monday to Sunday No restrictions

Bank Holidays No restrictions

The site access will be secured by lockable steel gates when closed with out of hours security provided.

# **5 MANAGEMENT SYSTEM**

An Environmental Management System (EMS) covers all aspects of operations and aims to effectively manage the impacts of the business on the environment. The key documents include:

1. Documents: Procedures to set out how to undertake operations and checking for any issues.
2. Forms on which to record information and provide evidence of the system functioning properly.

An updated Environmental Management System has been prepared for the updated operations.

# **6 TRAINING**

All staff have received training within the current Hill Demolition LLP employee training at site, as part of ISO14001, to a standard which enables them to perform the responsibilities described above and the detailed role as set out in job descriptions.

The operations will continue to be overseen by a Technically Competent Manager(s) who will be based at the site along with the company Transport Manager.

# **7 ENVIRONMENTAL RISK ASSESSMENT**

The existing Environmental Risk Assessment has been reviewed with the conclusion that no additional risk to the environment or human health will arise as a result of this application.

The summary of the application is to add identified liquid wastes, non-combustible and stored in tanks, along with additional non-combustible wastes for crushing and screening to produce secondary aggregates.

The proposed treatment of these waste types will not increase the current level of risk of potential emissions to human or environmental health.

The environmental risk assessment concludes that the existing Fire Prevention Plan will remain unchanged and no additional plans (odour, noise and similar) will be required.

# **8 APPLICATION DOCUMENTS**

The application includes the following documents:

All documents as submitted via email:

Application documents; Parts A, C2, C4 and F1

Documents associated with Parts A, C2, C4 and F1

Non-Technical Summary [this document]