



**BANKWOOD LANE WASTE TREATMENT
AND PROCESSING CENTRE**

**APPLICATION FOR ENVIRONMENTAL PERMIT VARIATION
UNDER THE ENVIRONMENTAL PERMITTING (ENGLAND AND
WALES) REGULATIONS 2016
(AS AMENDED)**

NON TECHNICAL SUMMARY

ECL Ref: ECL.041.01.01/NTS

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NON-TECHNICAL SUMMARY



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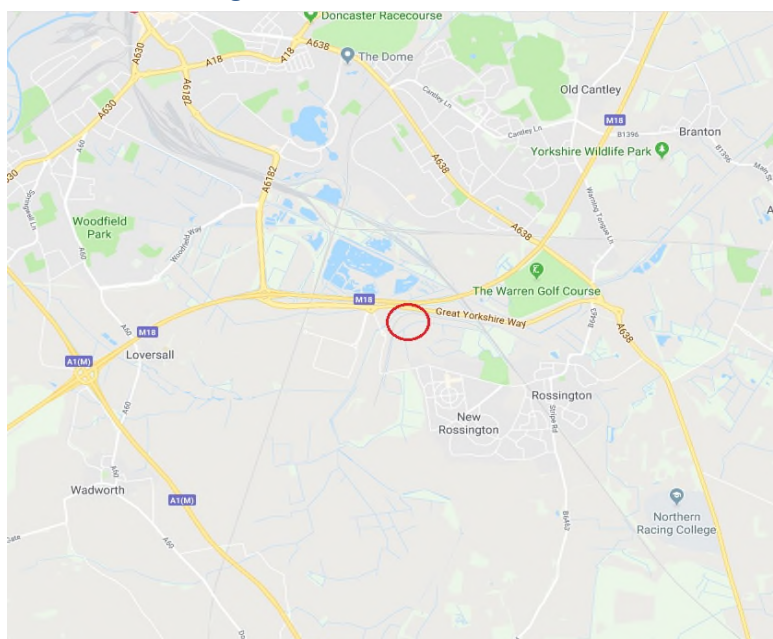
ACRONYMS / TERMS USED IN THIS REPORT

AMP	Accident Management Plan
ASCR	Application Site Condition Report
Attero	Attero Recycling Limited
BAT	Best Available Techniques
BREF	BAT Reference Document
CCA	Climate Change Agreement
DAA	Directly Associated Activities
EA	Environment Agency
ECL	Environmental Compliance Limited
EMP	Emissions Management Plan
EMS	Environmental Management System
ERA	Environmental Risk Assessment
FPP	Fire Prevention Plan
MCPD	Medium Combustion Plant Directive
NMP	Noise Management Plan
OMP	Odour Management Plan
PMP	Pest Management Plan
RDF	Refuse Derived Fuel
SRF	Solid Refuse Fuel
WT	Waste Treatment
WYG	White Young Green

1. INTRODUCTION

- 1.1 Environmental Compliance Limited (“ECL”) has been commissioned by Attero Recycling Limited (“Attero”) to produce an Environmental Permit (“EP”) variation application for their site (Bankwood Processing Site) at Bankwood Industrial Estate, Rossington, Doncaster, DN11 0PS.
- 1.2. Attero currently operate Bankwood Processing Site, a Materials Recycling Treatment Facility, as a Waste Facility under Environmental Permit (EPR/EB3207LH - Notice of Transfer, issued 09/05/2016) delivering waste management solutions, treating a range of commercial and industrial waste.
- 1.3. The purpose of this variation is to increase the maximum annual waste throughput from 200,000 tonnes to 400,000 tonnes. The daily capacity of the site would exceed 50 tonnes per day and as a result of this Environmental Permit variation the site would change its status from a waste facility to that of an Installation. To account for this increased waste acceptance, Attero propose to expand the Environmental Permit boundary as shown on the Site Layout Plan (ECL.041.01.01-02), which is submitted as part of this variation application. In addition, Attero wish to develop the waste recycling operations and focus on producing Refuse Derived Fuel (RDF) and Solid Refuse Fuel (SRF), in so doing wish to include a Directly Associated Activity in the form of air drying of the SRF fraction of waste treated at the site.
- 1.4. As part of this variation application, Attero wish to rename their site as Bankwood Lane Waste Processing and Treatment Centre, herein after to as the Installation.
- 1.5. The Installation is located within the Bankwood Industrial Estate in Rossington, Doncaster and will occupy an area of approximately 4 hectares.
- 1.6. The Installation is centred on National Grid Reference 460526 399122 and its approximate location is shown in Figure 1.

Figure 1: Installation Location



- 1.7. In addition to this Non-Technical Summary (“NTS”), the following reports have been produced to support this Environmental Permit variation application:
- the relevant Application Forms;
 - the supporting drawings;
 - Environmental Permitting Technical Requirements Report (ECL.041.01.01/EPTR) – the technical information required for the permit application;
 - Application Site Condition Report (ECL.041.01.01/ASCR) – a document detailing the condition of the additional land to be included in the permit boundary as a result of the proposed site expansion;
 - an Environmental Risk Assessment (ECL.041.01.01/ERA);
 - a Fire Prevention Plan (ECL.041.01.01/FPP);
 - an Emissions Management Plan (ECL.041.01.01/EMP);
 - a Noise Management Plan (ECL.041.01.01/NMP);
 - an Odour Management Plan (ECL.041.01.01/OMP); and
 - a Pest Management Plan (ECL.041.01.01/PMP).

2. LISTED ACTIVITIES

- 2.1. The proposed listed activities covered by the description in Section 5.4. in Part 2 to Schedule 1 of the Environmental Permitting (England and Wales) Regulations 2016 (“EP Regulations”) are provided in Table 1 below.

Table 1: Schedule 1 Activities

Activity Reference	Activity listed in Schedule 1 of the EP Regulations	Description of Specified Activity	Limits of Specified Activity
A1	Section 5.4 A(1) (a) (ii)	Disposal of non-hazardous waste with a capacity exceeding 50 tonnes per day (or 100 tonnes per day if the only waste treatment activity is anaerobic digestion) involving one or more of the following activities, and excluding activities covered by Council Directive 91/271/EEC concerning urban waste-water treatment(a)— (ii) physico-chemical treatment;	From material entering site to final dispatch offsite.
A2	Section 5.4 A(1)(b)(ii)	Recovery or a mix of recovery and disposal of non-hazardous waste with a capacity exceeding 75 tonnes per day (or 100 tonnes per day if the only waste treatment activity is anaerobic digestion) involving one or more of the following activities, and excluding activities covered by Council Directive 91/271/EEC – (ii)pre-treatment of waste for incineration or co-incineration.	From material entering site to final dispatch offsite.

- 2.2. The proposed Directly Associated Activity (“DAA”) at the Installation will be the storage of waste prior to dispatch.
- 2.3. In order to reduce the moisture content of waste outputs, Attero are proposing to carry out drying operations by passing warm air through the waste materials to produce higher quality Solid Recovered Fuel (“SRF”). This will be achieved through the operation of 9 sets of 7 Angus Orland Super 130kW biomass boilers inside the Heater Building. This will be classed as a Non Listed Directly Associated Activity.

3. MANAGEMENT SYSTEM

- 3.1. Attero operate an Environmental Management System (“EMS”) at the Installation which addresses all environmental matters. An outline of the proposed additions to the EMS to take account of the changes outlined in this Environmental Permit variation is as follows:
- the commitment shown by Senior Management, such as providing physical and financial resources, will remain the same but will be discussed in the context of the increased throughput of waste and greater extent of permitted land;
 - the Environmental Risk Assessment (“ERA”) (ECL.041.01.01/ERA) submitted as part of this application will be used to inform the new risks and opportunities at the Installation;
 - the Environmental Aspects will remain the same but the associated risk ratings will be reassessed in light of the variation. Additional control measures will be implemented to prevent or reduce the additional risks. The Environmental Aspects Register updates will inform the continued development of the site, including the location of certain activities and the operational procedures required.
 - environmental training will be provided for all employees. This will act as a refresher in regards to EMS principles and will focus on the EMS amendments and the varied Environmental Permit.
 - the process flow diagram within the EMS will be updated to Figure 1 contained in this document;
 - operational procedures will be amended to take account of the location changes of waste processing and storage areas.
 - As identified in the Environmental Risk Assessment (ECL.041.01.01/ERA) undertaken as part of the permit variation, specific management plans have been created and these will be implemented as part of the EMS;
 - The existing Accident Management Plan (“AMP”) will be updated and continue to form part of the EMS;
 - the Fire Prevention Plan (ECL.041.01.02/FPP), which has been updated to take account of the additional quantity of waste to be stored on site will be implemented and held within the EMS; and
 - the Site Closure Plan will also be updated to take account of the proposed changes and to demonstrate that the site can be decommissioned to avoid any pollution risk and return the site of operation to a satisfactory state.

4. OPERATING TECHNIQUES

- 4.1. Currently, a number of processes are in operation at the site including:
- sorting and separating waste types both mechanically and by hand;
 - recycling various waste types, including metals, wood, plastics and aggregates;
 - shredding on-recyclable materials to recover the waste as fuel products;
 - blending waste materials to produce usable products (e.g. soils or fuels);
 - drying waste to improve fuel (SRF) quality; and
 - baling of waste materials for exports as fuels (SRF/RDF).
- 4.2. In addition to the main processing operations, Attero have been removing a large stockpile of historic waste for several years. This waste was imported by previous occupiers of the site and consists of predominantly construction and demolition materials. Attero have removed the majority of the waste, with only a small quantity remaining in the western corner of the site. The removal of this material is required in order to enable a new access road to be built.
- 4.3. The Operator is proposing to increase the maximum annual waste throughput from 200,000 tonnes to 400,000 tonnes. All of the waste operations currently being carried out on site will remain the same under the proposed variation. However, the shredding and trommeling operations will be relocated and housed with the new Waste Processing Building located to the west of the site as shown on the Site Layout Plan. This will enable approximately 50% of the current external waste processing operations to be carried out indoors.
- 4.4. As part of the site's expansion works, the additional areas on site which are proposed as part of this variation will have concrete impermeable surfacing installed prior to any waste processing or storage in these areas.
- 4.5. A newly constructed weighbridge and office are to be located to the west of the site, adjacent to the new site entrance. A new internal road will be constructed which will enable a one way system to be implemented.
- 4.6. At present, the site does not possess sufficient HGV parking provision. To maintain safe and efficient operations, Attero are proposing to develop to the east of the currently permitted site. This area would be engineered to create a level development platform, surfaced with concrete impermeable surfacing and any necessary drainage features will be installed.
- 4.7. A relocated rail loading area will be provided adjacent to the proposed lorry park. The rail is used to transport only those materials excavated from the former Bolland Skip Hire Environmental Permit boundary. The proposed rail loading area will consist of a concreted area at the northern end of the lorry park which will be used to stockpile materials for loading onto trains.
- 4.8. Additionally, Attero are proposing to construct a new single carriageway link road to the west of the site to connect with the existing roundabout off West End Lane eliminating the need for the HGV lorries travelling to and from site to drive through the Bankwood

Lane Industrial Estate. An internal, private access way will connect the Installation to the new road. This new access will be secured with lockable steel gates.

- 4.9. All these proposed changes are shown on Drawing ECL.041.01.01-02 Site Layout Plan dated 15th October 2018.

5. EMISSIONS

- 5.1. White Young Green (“WYG”) was commissioned by Attero to prepare a detailed dispersion modelling assessment of emissions from the boiler stacks in May 2018. This Air Quality Assessment (“AQA”) is contained in Appendix IV of the Environmental Permitting Technical Requirements Document (ECL.041.01.01/EPTR). The report concluded that predicted concentrations of the modelled pollutants from the operations are considered acceptable for the protection of human health, vegetation and habitats.
- 5.2. There will be no point source emissions to water, sewer or land associated with the proposed changes.
- 5.3. The potential sources of fugitive emissions to air have been identified and an Emissions Management Plan (“EMP”) has been prepared to prevent any potential dust nuisance from reaching any relevant receptors.
- 5.4. Fugitive emissions to surface water, sewer and groundwater have been considered. The operational areas are already surfaced with impermeable concrete surfacing; additional waste processing and storage areas will be progressively surfaced with concrete impermeable surfacing and the site boundary is enclosed by a containment concrete bund and wall. This prevents the escape of any surface water run-off from the site. Any clean surface water runoff (e.g. rainwater) is contained within the bunded areas and is soaked up within the waste materials on site and/or evaporates.
- 5.5. Fugitive releases to the groundwater will be prevented by conducting all operations, including the unloading of deliveries, storage of raw materials and product, processing and handling in areas on concrete impermeable surfacing to prevent a pathway for migration to ground.
- 5.6. The process and storage areas are not directly linked to the sewage drainage network and therefore, there is no risk of fugitive emissions to sewer from the proposed operations.
- 5.7. Any potentially polluting spillages at the Installation will be subject to the Installation’s robust spill management procedure which would prevent such an occurrence.

6. GENERAL REQUIREMENTS

- 6.1. The Environmental Risk Assessment has demonstrated that the following reports are required as part of this variation application:
- Emissions Management Plan;
 - Odour Management Plan;
 - Noise Management Plan; and
 - Pest Management Plan.
- 6.2. Due to the types of waste accepted on site, under the Environment Agency's Fire Prevention Plan guidance, updated 4 May 2018, fire risk and mitigation is required to be considered as part of the variation application, consequently a Fire Prevention Plan has been updated from the existing currently approved Fire Prevention Plan and is included with this application.

7. APPLICATION SITE CONDITION REPORT

- 7.1. An updated Application Site Condition Report ("ASCR") has been prepared to take account of the additional land proposed as part of this variation. The ASCR (Document Reference ECL.041.01.01/ASCR) is submitted as part of this Environmental Permit variation application.

8. MONITORING

- 8.1. No monitoring of emissions to air is proposed. Each boiler in operation within the Heater Building has a net rated thermal input of 0.91MW. Therefore, the Medium Combustion Plant Directive ("MCPD") is not applicable.
- 8.2. No monitoring of groundwater is proposed. Fugitive releases to the groundwater will be prevented by conducting all operations, including the unloading of deliveries, storage of raw materials and product, processing and handling in areas sealed with an impervious concrete surfacing to prevent a pathway for migration of pollutants to groundwater.
- 8.3. There will be no process contribution to surface water or foul water. Additionally, the operational areas are surfaced with impermeable concrete and the site boundary is enclosed by a containment concrete bund and wall. This prevents the escape of any run-off from the site. Therefore, no monitoring is proposed.

9. RESOURCE EFFICIENCY AND CLIMATE CHANGE

- 9.1. A number of energy efficiency measures will be implemented at the Attero site and energy use will be monitored monthly to produce an energy balance record and any opportunities for energy efficiency improvement will be addressed as part of the EMS.

- 9.2. The Attero site is not subject to a Climate Change Agreement (“CCA”).
- 9.3. The raw materials to be consumed at the site have been considered. Virgin wood will be used as a fuel for the 63 boilers for drying operations. It is anticipated that a maximum of 12,000 tonnes per annum will be consumed by the site for this use.
- 9.4. Diesel will be consumed for plant and electrical generators on site. Diesel is stored in a 40,000 litre tank, appropriately bunded to hold 110% of the capacity and is located between the workshop and Baler Building. The estimated diesel consumption is 1, 200,000 litres per annum.
- 9.5. Additionally, minimal amounts of Adblue and Hydrodotr XC will be used on site.
- 9.6. All potentially polluting material will be stored in appropriate containers and bunded to hold 110% of the capacity or 25% of the combined capacity of all the containers on the bund.
- 9.7. The proposed process undertaken at Attero is a waste avoidance and recovery process in its own right. Through the application of the waste hierarchy, all waste materials are delivered to the Installation with the aim of processing and recovery.
- 9.8. 350,000 tonnes per annum of RDF/SRF will be processed and sent off site for use as a fuel at an appropriately licenced energy from waste site, therefore, diverting a significant amount of waste from landfill.
- 9.9. Approximately only 1% of the annual throughput of waste will be disposed of to landfill having been assessed and recycling/recovery deemed not possible.
- 9.10. The ash produced as a result of the biomass boilers will be minimal, appropriately 20 tonnes per annum, assuming all 63 boilers are 100% utilised. The ash will be stored within enclosed containers and will be collected for disposal to landfill when required.

10. COMPLIANCE WITH BEST AVAILABLE TECHNIQUES

- 10.1. It is considered the techniques that will be in use at the proposed Installation will constitute Best Available Techniques (“BAT”) and will be appropriate and proportionate for the scale of the activities at the Installation and the risks that are posed to the environment by these activities.
- 10.2. The BAT Requirements for the proposed Installation have been taken from the EA’s Sector Guidance Note IPPC S5.06 Guidance for the Recovery and Disposal of Hazardous and Non-Hazardous Waste’ (Issue 5, Date 2013).
- 10.3. There are also a number of BREFs which have also been taken into consideration, where relevant. The Waste Treatments Industries BREF (August 2006) has been considered as it covers installations associated with a number of waste treatments, including recovery and disposal of waste. The Waste Treatment Industries BREF is to be formally updated

shortly. Therefore, the formal final draft BREF (October 2017), now referred to as the Waste Treatments (“WT”) BREF, has also been considered in the preparation of this Environmental Permit variation application.

- 10.4. In August 2018, the WT BAT Conclusions Document was published by the European Commission. The proposed Installation will achieve compliance with these newly published BAT Conclusions.