

## Non-Technical Summary

### **Objective of application:**

4Recycling Ltd are applying for a consolidated bespoke site-based waste permit to allow a total maximum annual throughput of 100,000 tonnes.

No more than 10,000 tonnes of treated hazardous material will be stored on site at any one time. This includes hazardous wastes pre-treated prior to import and hazardous wastes post treatment at the site.

Hazardous wastes that require treatment at the Old Peat Works will be limited to a maximum of 10 tonnes treated per day, with a maximum of 50 tonnes stored pending treatment<sup>1</sup>.

The consolidated bespoke permit will be comprised of the following activities;

- Existing waste types, activities and limits of activities under the following standard rules permits limited only to wastes that have a value to soil and can be subsequently recovered to land<sup>2</sup>;
  - SR2008No19\_75Kte
  - SR2015No6\_75Kte
  - SR2010No17
- Additional activities, not currently covered by standard rules;
  - To include EWC codes 06 02 01\*, 17 05 06, 19 02 06, 19 13 04 and 19 13 06 for activities and limits of activities as described in SR2008No19\_75Kte
  - Treatment of EWC codes 10 01 01, 10 13 12\* and 10 13 13 by conditioning with water or water treatment works sludge (19 09 02)
  - To include EWC codes 06 02 01\*, 10 13 12\*, 17 05 06, 19 01 18, 19 02 04\*, 19 05 03 (multiple definitions of), 19 05 99, 19 06 04, 19 06 06, 19 08 01, 19 12 12 and 19 13 06 for activities and limits of activities as described in SR2015No6\_75Kte
  - To include EWC codes 02 01 03, 03 01 01, 03 01 05, 03 03 01, 04 02 21, 04 02 22, 10 13 12\*, 19 02 04\*, 19 05 03 (two definitions of) for activities and limits of activities as described in SR2010No17
  - Storage of EWC codes 02 01 07, 02 02 03, 06 02 01\*, 17 08 02, 19 05 03, 19 08 01, 19 13 06

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<sup>1</sup> All hazardous wastes proposed in Part B4\_1b Lists of Wastes are deemed hazardous by the nature of the materials that deem them beneficial. These are liming materials with high pH values that can either be conditioned for land application or applied directly to land under standard rules or existing bespoke mobile plant permits held by 4Recycling Ltd

<sup>2</sup> I.e. wastes eligible for spreading for agricultural or ecological benefit under SR2010No4, SR2010No5 & SR2010No6 under Environmental Permitting Regulations, Sludge (Use in Agriculture) Regulations and Sludge Code of Practice and PAS100/PAS110 and associated Quality Protocols

Full descriptions of the intended waste operations, activities, proposed lists of acceptable wastes and definitions of each EWC code described above for each proposed activity are provided in Part B4 1b of the permit application.

***Pre-application discussions:***

A pre-application enquiry was made to the EA on 9<sup>th</sup> April 2018 with feedback from [REDACTED] received on 30<sup>th</sup> April (Ref: EPR/GB3202XN/A001). Feedback was subsequently discussed between [REDACTED] and [REDACTED] by phone relating to the need for applying for the standard rules permits as well as the bespoke elements as opposed to applying for a single consolidated bespoke permit. It was agreed that the latter was most likely the best way forward to avoid multiple permits within a single site boundary.

***Background:***

This application is to allow the treatment and storage of wastes at The Old Peat Works site (SE 76875 16851) prior to recovery by land application. The Old Peat Works is a vacant industrial site, with existing planning for industrial use processing a range of materials for the growing media market. The site was formerly used for peat importation, processing and export up until the late 1990's and is allocated in the East Riding of Yorkshire's local plan for industrial use. We have applied to the local planning authority for revised planning to fully cover our intended activities and this was submitted on 12<sup>th</sup> November 2018 after significant engagement with local stakeholders. A full copy of our Frequently Asked Questions document, prepared for the public and other stakeholders in advance of our public exhibition on 1<sup>st</sup> October 2018 is provided for reference. This provides detailed background information about the site and explains more about what we are proposing at The Old Peat Works.

We are applying for up to 100,000 tonnes total annual throughput at The Old Peat Works comprised of the activities as outlined above. We have suggested maximum tonnages for each activity in Part B4 1a, adapting as necessary from existing standard rules. The site contains significantly sized buildings which will be re-purposed to house delivery and treatment activities and designated bays and tanks will be constructed on the existing expanse of concrete to accommodate storage of stackable and non-stackable wastes.

The site is surrounded by more than 6000 hectares of agricultural land, predominantly supporting arable farming. We have interest from several local landowners and farmers for the materials we propose to store and process at The Old Peat Works to replace heavy reliance on manufactured compound fertilisers. There is also a significant need for organic additions in the locality due to the lack of livestock and long-term continual cultivation to meet consumer demands.

The bulk of our proposed treatment and storage activities for the site are covered by existing standard rules permits SR2008No19\_75Kte, SR2015No6\_75Kte and SR2010No17. However, we only want to import, process and store materials that can be subsequently applied to land to confer benefit. This eliminates several waste

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streams from the above standard rules which cannot be recovered to land under the Environmental Permitting Regulations, Sludge Use in Agriculture Regulations or the PAS 100/110 and associated Quality Protocol routes.

The remainder of our proposed activities are comprised of bespoke elements that are not currently covered by standard rules. These are outlined above and are described in full in Part B4 1a-1b. Most of these bespoke activities involve the addition of EWC codes to the three standard rules mentioned above plus the conditioning of ash, cement kiln dust and by-pass dusts with water or clean water treatment works sludge and storage of materials eligible for land-spreading not covered by standard rules permits. All bespoke elements proposed have been fully considered and risk assessed (Part B2\_6 4RMS045 Bespoke Risk Assessments). Site operations will be supported by our ISO accredited (9001, 14001 and 18001) and Achilles verified procedures with site-specific mitigation and management plans as enclosed (Odour Management Plan – OMP, Fugitive Emissions Management Plan – FEMP and the Fire Prevention Plan – FPP). Please refer to B4 1b for the main lists of activities and associated wastes for details on when a risk assessment, odour management and fire prevention planning has been required and undertaken.

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