



# **Greendale Business Park (Unit 29B)**

## **Environmental Permit Application**

### **Non-Technical Summary**

**May 2019**

Prepared on behalf of Synergy Asset Services Limited





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**Contents**

1.0 Introduction ..... 1  
2.0 Non-Technical Summary..... 2

**Drawings**

SYN/A108683/GBP/PER/01 – Environmental Permit Boundary

**Appendices**

- Appendix A – Application Forms
- Appendix B – Operating Techniques
- Appendix C – Environmental Risk Assessment
- Appendix D – Site Condition Report

## **1.0 Introduction**

### **1.1 Application Requirements**

- 1.1.1 This Environmental Permit application has been prepared by WYG on behalf of the operator, Synergy Asset Services Limited (Synergy), in accordance with the requirements of the Environmental Permitting (England and Wales) Regulations 2016 (as amended).
  
- 1.1.2 Synergy are seeking to gain an Environmental Permit to allow the acceptance and temporary storage of used hazardous and non-hazardous gas cylinders and other pressure vessels at their site on Greendale Business Park. The gas cylinders and other pressure vessels will then be transferred off site to a suitable permitted facility for treatment and disposal/and or recovery.

## 2.0 Non-Technical Summary

### 2.1 Permit Application

- 2.1.1 This Environmental Permit Variation Application is submitted to the Environment Agency by the operator, Synergy, under the requirements of the Environmental Permitting (England and Wales) Regulations 2016 (as amended). It is a requirement of these Regulations that any application is accompanied by a Non-Technical Summary of the submitted documentation.
- 2.1.2 The application site is situated at Unit 29B of the Greendale Business Park in Exeter; the unit is within the Central Zone of the business park. The site is centred at approximate National Grid Reference (NGR) SY 01830 89907 and the Environmental Permit Boundary is shown on Drawing Number SYN/A108683/GBP/PER/01.
- 2.1.3 Access to the site can either be achieved from an access road located to the north of the site that runs along the northern boundary of the Greendale Business Park or an access road located to the east of the site that runs along the eastern boundary of the business park. The immediate surroundings of the site comprises an industrial setting as part of the wider business park. Beyond the business park, the surroundings are largely agricultural.
- 2.1.4 The proposed operation at the application site involves the receipt of used gas cylinders and other pressure vessels. These cylinders come from a variety of locations including civic amenity sites and direct collection from users, both of which are heavily reliant on Synergy's services. The classification of cylinders as a waste or non-waste has been discussed during a previous site inspection by the Environment Agency and it is understood that those cylinders which are collected and returned to their respective owners (e.g. Flogas cylinders) do not constitute a waste and as such do not fall within the remit of this permit application. However, those cylinders received at the site which are destined for onward treatment and disposal and/or recovery elsewhere are classified as waste in line with Environment Agency guidance document "Legal Definition of Waste."
- 2.1.5 Synergy are seeking to gain a bespoke Environmental Permit to allow the acceptance and temporary storage of used gas cylinders at their site on Greendale Business Park (Unit 29B), consisting of some hazardous and some non-hazardous gas cylinders, as described below.
- 2.1.6 Hazardous gas cylinders will be transferred off site to a suitable permitted facility for treatment and disposal/and or recovery. The site will store the hazardous gas cylinders within Intermediate Bulk Containers (IBC) and will not store more than 10 tonnes of gas cylinders on site at any one

time. The maximum permitted tonnage of hazardous gas cylinders to be received at the site will be 30 tonnes per annum.

2.1.7 This application also seeks to allow the storage pending transfer off site of non-hazardous cylinders and other pressure vessels. The maximum quantity of non-hazardous cylinders will be 40 tonnes at any one time with a maximum annual throughput of 120 tonnes.

2.1.8 Given the nature of the proposed waste types, reference has been made to Schedule 1 of the Environmental Permitting (England and Wales) Regulations 2016. As noted under Section 5.6 'Temporary or underground storage of hazardous waste' any facility that intends to store over 50 tonnes of hazardous waste on a temporary basis is considered to be undertaking a Schedule 1 activity and therefore should be regulated as an 'installation'. With regards to the proposed activities at the site, the operator intends to store no more than 10 tonnes of hazardous waste on site at any one time. As such, it is considered that the proposed activity at the site would not constitute an installation and would be regulated as a 'waste operation' facility.

2.1.9 This application is accompanied by relevant documentation, as considered necessary, and in the format set out in the Environment Agency guidance documents. In summary, these documents comprise: -

- Application Forms A, B2, B4 and F1;
- Operating Techniques;
- Environmental Risk Assessment; and
- Site Condition Report.

2.1.10 Specific details on the operations of the site are provided in the Operating Techniques (Appendix B), which describes both the operational techniques and management procedures carried out at the site. In summary, this document provides details of:-

- Waste types and waste acceptance criteria;
- Site records;
- Emissions control;
- Incidents and non-conformance procedures;
- Accident management; and
- Emergency procedures.

- 2.1.11 The Environmental Risk Assessment (Appendix C) is concerned with the nature and extent of any linkages between the source of any environmental hazards, and the receptors, which may be susceptible to harm, such linkages being termed pathways. Where potential for harm is identified, the assessment identifies engineering or management techniques which will mitigate such impacts.
- 2.1.12 The Site Condition Report provides (Appendix D) provides an assessment of the site's current condition using the Environment Agency's H5 Site Condition Report Template, including any details of any past uses, historical pollution events and the environmental characteristics of the site.
- 2.1.13 As noted in Section 5d of Part B2 of the Environmental Permit application forms, if a facility comprises the storage of combustible wastes, a fire prevention plan must be submitted in accordance with the Environment Agency's 'Fire Prevention Plans: Environmental Permit Permits' guidance. With reference to Section 3 of the guidance, wastes such as gas cylinders, aerosols and combustible liquids are not covered under the Environment Agency's Fire Prevention Plan guidance. Instead, these wastes are covered under the Environment Agency's 'Guidance for the Storage and Treatment of Aerosol Canisters and Similar Packaged Wastes' document which includes details regarding fire prevention. As such, the Operating Techniques (Appendix B) has been prepared in accordance with this guidance.



## Drawings

SYN/A108683/GBP/PER/01 – Environmental Permit Boundary



# Appendices



## **Appendix A – Application Forms**



## **Appendix B – Operating Techniques**



## **Appendix C - Environmental Risk Assessment**



## **Appendix D – Site Condition Report**