Environmental Permit

Kingspit Lane, Lowheath, Petworth, GU28 0HG

Variation Application

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For

Kingspit Transport Limited

EPR/EB3901CL

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[KTL-VAR-V1]

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1. INTRODUCTION

1.1 This report supports an application to vary an Environmental Permit on behalf of Kingspit Transport Limited (KTL) at their facility at Kingspit Lane, Lowheath, Petworth, GU28 0HG.

1.2 The Environmental Permit was originally issued on 4 May 2017.

1.3 The Environmental Permit EPR/EB3901CL is a Standard Rules Permit (SR2008No11). This is for an inert and excavation waste transfer station with treatment.

1.4 The company has an Environmental Management System (EMS) which has been updated to support this application.

1.5 The permit is required to be varied to add blending to the listed activities.

1.6 The operations at the site are consistent with Standard Rules SR2010 No12 - Treatment of waste to produce soil, soil substitutes and aggregate. This Standard Rules set allows sorting, screening, separation, crushing and blending of waste for recovery as a soil, soils substitute or aggregate.

1.7 The current permit allows manual sorting, separation, screening or crushing of waste into different components.

1.8 The operations at the site will continue as they would under the SR2008No11 permit but will also follow the rules of the Standard Rules set SR2010 No12 to allow blending. The operator does not require all the wastes listed in the SR2010 No12 Standard Rules set and there will be no change to the permitted waste list.

1.9 However, there is a locational constraint with the SR2010 No12 set which prevents it being applied for and on that basis, a bespoke permit is sought.

1.10 The site is located within 50m of a site that has species or habitats protected under the Biodiversity Action Plan that the Environment Agency considers at risk to this activity. On that basis, the operations cannot meet the Standard Rules set.

1.11 This document sets out how the site will be operated to prevent harm to this designation only. All other locational criteria can be met.

1.12 The proposed change will allow the operator to manufacture soils compliant with the RPS190. Specifically, permission is sought for the physical treatment of non-hazardous waste to produce to soil, soil substitutes and aggregate.

1.13 The Site Plan has been updated to show where the blending activity will take place. All other activities will continue in the location permitted by the current permit, see Drawing No KTL-LAY-01 Rev C

1.14 A Non-Technical Summary is provided as a separate document, KTL-NTS-V1.

1.15 Discussions with the Environment Agency have taken place with regards to the nature of the variation. The Environment Agency has decided that the application is a substantial variation. The operator disagrees with this conclusion as it only seeks to add blending as a listed activity. Ideally, the applicant would change the permit to Standard Rules SR2010 No. 12 but due to the proximity of the woodland this is not

suitable. Due to this one constraint, the operations fall within the remit of a bespoke permit. The advice from the Environment Agency is that a request for an abatement of the application fee is made at the time the application is submitted.

2. PROPOSED CHANGES

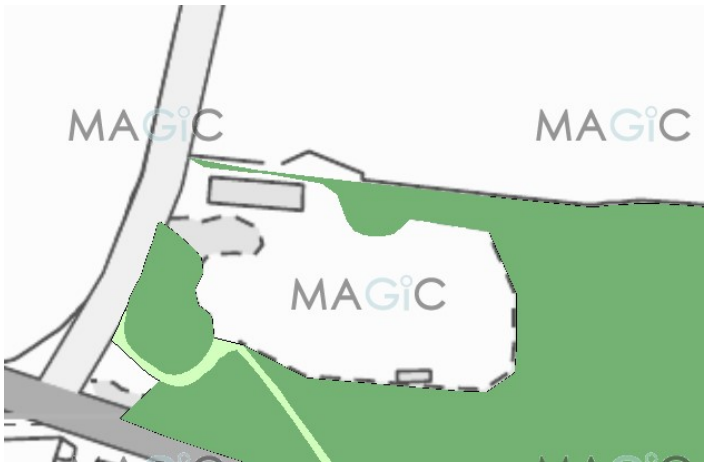
2.1 The application seeks to vary the current Standard Rules set to a bespoke permit for the physical treatment of non-hazardous waste to produce to soil, soil substitutes and aggregate.

2.2 The current Standard Rules set (SR2008No11) does not include blending. Standard Rules set (SR2010No12) allows blending but cannot be carried out within 50m of a habitat protected under the Biodiversity Action Plan.

2.3 The proposed operation will not increase the risk to the woodland.

2.4 The site is surrounded by a deciduous woodland that is a priority habitat as indicated on Figure 1.

Figure 1 – Location of Priority Habitat



2.5 The layout is provided in Drawing No. KTL/LAY/01B. This shows the area to be used for blending.

2.6 The site receives waste mainly from excavation projects. This is waste generated from excavated foundations for construction projects.

2.7 The following wastes will be accepted at the site (this is the same as the current permit). The applicant does not intend to accept all the wastes listed on the Standard Rules SR2010 No12.

17	CONSTRUCTION AND DEMOLITION WASTES (INCLUDING EXCAVATED SOIL FROM CONTAMINATED SITES)
17 01	concrete, bricks, tiles and ceramics
17 01 01	Concrete
17 01 02	Bricks
17 01 03	tiles and ceramics
17 01 07	mixtures of concrete, bricks, tiles and ceramics other than those mentioned in 17 01 06
17 02	wood, glass and plastic
17 02 02	Glass
17 03	bituminous mixtures, coal tar and tarred products
17 03 02	bituminous mixtures other than those mentioned in 17 03 01
17 05	soil (including excavated soil from contaminated sites), stones and dredging spoil
17 05 04	soil and stones other than those mentioned in 17 05 03
17 05 08	track ballast other than those mentioned in 17 05 07
20	MUNICIPAL WASTES (HOUSEHOLD WASTE AND SIMILAR COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL WASTES) INCLUDING SEPARATELY COLLECTED FRACTIONS
20 02	garden and park wastes (including cemetery waste)
20 02 02	soil and stones

2.8 The throughput will remain at 75,000 tonnes per annum. The maximum amount of waste permitted to be stored on site at any one time in the Standard Rules permit for the same activity is 40,000 tonnes. The proposed operation will store up to 20,000 tonnes at any one time.

2.9 In term of risk, the proposed changes will not increase the risk of harm to local amenity or the environment. A Risk Assessment is provided as a separate report KTL-ERA-V1. To support the application, the risk assessment should consider the risk associated with the blending activity only and the risk to the woodland. For completeness, the Risk Assessment considers all site operations.

2.10 It must be noted that the current activity of screening and crushing can operate adjacent to the woodland, using the permitted waste codes and throughput. The ability to blend the soils to produce a manufactured topsoil will not increase the risk of harm to the woodland. It will operate with fewer waste codes that on the SR2010 No12 permit and store half of the permitted capacity of waste.

2.11 The blending activity will take place in the central part of the site, which is furthest from the woodland in all directions.

Blending

2.12 Blending is carried out to improve the nutrient value of the soil with a view to market the soil as a manufactured topsoil. The soil is blended with imported compost. The incoming mixed soils will be screened to remove the stone content. The soil is then transferred to a specific area and blended with compost. The soil is then tested to meet the requirements of British Standard BS3882.

2.13 An excavator is used to blend the soil and compost.

2.14 Once the soil has been confirmed as compliant with BS3882, it can be used for projects under RPS190.

2.15 The operations will take place on hardstanding.

3. MANAGEMENT AND OPERATIONS

Operator Competence

3.1 There will be no changes to the operator competence. Certificates have been provided to the Environment Agency. Copies of the certificates will be kept at the site office.

Management System

3.2 The company has developed its own Management System. This will be updated once the permit has been varied.

3.3 The EMS is summarised in this section. The EMS provides the operational procedures for the site including waste acceptance, processing and storage.

Technical Competence and Staff Training

3.4 Prior to acceptance, all users of the site will be prior approved. This allows the operator to maintain full control of the incoming waste and ensure that all customers agree to the site rules. This will help to ensure that only the permitted wastes are accepted at the site and procedures for investigating non-compliance can be easily implemented. All users will be required to notify the site prior to delivery to ensure that there is sufficient capacity on site.

3.5 The pre-acceptance checks will include the following information:

- Source of the waste
- Nature of the material (soils, hardcore or concrete)
- Anticipated volume
- Waste carrier (if being arranged by a third party)

3.6 This information is obtained from staff working in the site office. A customer will contact the site either by telephone or email. The above information will be obtained, and the details confirmed as acceptable by the Site Manager.

3.7 Kingspit Transport will arrange collection of the waste. Kingspit is a Registered Waste Carrier. The Site Manager is responsible for ensuring that the registration is renewed.

3.8 For inquiries received from third parties that will be delivering waste, they must provide their Registered Waste Carriers Licence details at the time of booking.

3.9 The waste being delivered to the site arises from small construction projects such as residential extensions. Waste from these sources is likely to be generated from foundations (naturally occurring soils), removing pavements and demolishing walls for example. Waste is produced in small quantities, from small scale construction projects and therefore no chemical testing will be required.

3.10 The operator will not accept waste from development sites where there could be known contamination. For example, waste generated from a garage forecourt redevelopment.

3.11 Kingspit Transport operate grab loading vehicles. This allows the driver to inspect the waste prior to loading the vehicle. If there is any uncertainty about the nature of the waste, it will not be loaded, and the Site office will be contacted for advice.

3.12 For third party deliveries, the waste will be inspected as it arrives on site.

3.13 Incoming waste delivery vehicle drivers will report to the waste reception area on arrival to the site.

3.14 An initial visual inspection of the waste will be undertaken by the site operative to check for conformance.

3.15 A record of the delivery will be made using the following information: -

a) name of customer/haulier;
b) carrier's registration number;
c) date and time of delivery of waste;
d) registration number of the delivery vehicle;
e) an accurate description of the waste; and
f) transfer note reference number.

3.16 Drivers will not be permitted to unload the waste until all the necessary Duty of Care documentation has been inspected and is found to be in accordance with legislative requirements.

3.17 Non-conforming waste or heavily contaminated waste will be rejected. The driver will be informed of the rejection and the reasons. The site operative rejecting the waste will record in the Site Diary the waste type, reason for rejection, date, time and vehicle registration.

3.18 Incoming mixed soil will be stored in the designated area prior to screening. The screening will remove large stones. These materials will be moved to the crushing area. Loads which contain predominantly hardcore and concrete will be directed to the crushing area.

3.19 The crushing process can extract metal from the concrete waste. Concrete can contain reinforcing bar (rebar) and this can only be removed from the concrete during the crushing process. There is a magnet on the crusher which removes the metal.

3.20 The metal will be stored in a skip/container and once 80% full, arrangements will be made to transfer this load to a recycling facility.

3.21 The following storage capacities will apply:

- Crushing Area 2,000 tonnes
- Soil Reception Area 8,000 tonnes
- Soil 8,000
- Stones 2,000

Technical Competence and Staff Training

3.22 The operations will be overseen by a Technically Competent Manager (TCM). There will also be a Site Manager to assist with the day to day operations. The TCM will be responsible for ensuring the requirements of continued competency is met. A copy of the Certificate will be kept in the site office. The TCM and Site Manager will both carry out similar functions on site, with the TCM providing the overall management to ensure compliance.

3.23 The Site Management will be responsible for the control of incoming and outgoing vehicles, checking Duty of Care documentation, keeping and maintaining all computerised records, checking in all visitors to the site, issuing Health & Safety instructions and reporting any complaints to the management.

3.24 Other site personnel will include administrative staff and site operatives. All staff will be trained to a standard which enables them to perform the responsibilities.

3.25 A record of staff training will be kept for each staff member which includes inductions to new processes and procedures as needed.

3.26 The following training matrix will be adopted to guide training needs.

Training	TCM/Site Manager	Plant Manager	Site Operative	Admin
Induction	x	x	x	x
Accidents and Emergency	x	x	x	x
Amenity Management	x	x	x	x
Plant Training	x	x		
Vehicle marshalling	x	x	x	
Waste handling	x	x	x	
Environmental Permitting	x	x	x	x
Complaints and Incidents	x	x	x	x
Spillage Procedure	x	x	x	

Inspection and maintenance

3.27 The Site Management will be responsible for inspecting the operational areas and preventative maintenance will be undertaken according to the Site Inspection Daily Checks Form.

3.28 Plant and machinery on site is visually inspected by the operator before it is used as part of management of their own risks and health and safety. This is covered in training for staff and operatives. In addition, an equipment check is made by the Site Manager daily as part of Daily Checks and recorded on the Daily Checks Form.

3.29 In addition to scheduled preventative maintenance of equipment and machinery, in accordance with legal requirements or manufacturer's recommendations, reactive maintenance will be carried out if needed in accordance with inspection findings. This will be recorded in the site diary.

3.30 Daily checks are carried out to assess the condition of the yard including fencing, surfaces, building and storage bays. If any maintenance is required, it will be done as soon as possible and recorded in the site diary.

3.31 Daily inspections will be carried out on the safety and integrity of the building on site, it will also be monitored throughout the working day. The daily inspections also include regular checks for dust and mud.

3.32 Detailed weekly maintenance checks are carried out and recorded on a check sheet with a status and rectification/ action record to follow up on any necessary actions, records of this will be kept on site

3.33 The site diary will be maintained and updated to include the following: -

- Construction work
- Start and finish of daily waste management activities on site (operational hours)
- Maintenance
- Breakdowns
- Emergencies
- Problems with waste delivered and action taken
- Site inspections and consequent actions carried out by the operator
- Technically competent management attendance on site; the date and the time onto site and the time left site
- Despatch records
- Weather conditions
- Complaints about site operations and actions taken
- Environmental problems and remedial actions

3.34 The site diary will be kept in the site office and updated daily.

Records

3.35 All records required to be made by this permit shall be comprehensible, legible, and consistent. If amendments need to be made, they are done so in such a way that any subsequent amendments remain legible. Records, plans and management systems required to be maintained by this permit shall also be kept on site.

Reporting

3.36 All reports and notifications required to the permit by the Environment Agency shall be made to the Environment Agency using the contact details supplied in writing by the Environment Agency. Within one month of the end of each quarter, the operator shall submit waste returns to the environment agency using the form made available

for the purpose, the information specified on the form relating to the site and the waste accepted and removed from it during the previous quarter.

Complaints

3.37 The EMS includes a complaint procedure which covers matters such as:

- Receiving/documenting the complaint
- Investigation
- Corrective Action
- Report findings
- Closure

3.38 The blending activity does not use different plant to that already on site. It is unlikely that this activity will increase the likelihood of complaints.

4. INFORMATION

Records

4.1 The operator complies with the requirements for all aspects of record keeping, particularly waste transfer notes [to record and non-confirming or rejected waste and similar], the site inspection records and site diary.

4.2 The operator will provide quarterly return information as required using one of the formats made available by the Agency for this purpose.

4.3 A copy of the quarterly returns will be kept at site.