O'Donovan Alperton Environmental Permit Variation: Response to Schedule 5 request for more Information

1 Additional application fees

Additional fees of £19,077 have been paid directly by O'Donovan.

2 Detail is needed to explain how the site will accommodate twice the current throughput.

- Outline any changes needed in the existing infrastructure, operational systems and equipment to accommodate the additional throughput OR
- Detail is needed on how the existing infrastructure, operational systems and equipment have been assessed to demonstrate the capability to handle the additional throughput.
- Provide details of any potential environmental risks arising from this increase and any of the above changes

The site will be increasing it's operating hours to accommodate the additional throughput, to include a night shift. No additional processing equipment or infrastructure will be used. The existing equipment and infrastructure is sufficient to process additional waste over extended operating hours. The site does not expect to receive loads at night, the night shift will operate processing of waste only. Potential additional risks therefore include noise. Noise levels have been assessed (see below).

3 A noise impact assessment and noise management plan must be provided.

Noise impact assessment and noise management plan is provided at Appendix A.

Fire prevention plan

4 More detail is needed on the storage controls in place for waste stored in metal containers in the yard.

- Some of these wastes are flammable and on the site plan it is not clear which containers the FPP is referring to, and what measures are in place i.e. are the containers lidded or are there separation distances between the containers? On the site plan provided the objects marked as storage bins and skips storage appear to be tightly packed and adjacent to the site boundary.

The metal containers in the yard are marked with an X on the site layout plan. These containers are not lidded and are next to each other. The other side of the site perimeter is a roadway providing access to the neighbouring site. The procedure set out in Section 8 of the FPP would be followed in the event of a fire in one of the containers i.e. it would be moved to the quarantine area immediately using one of the site excavators.

In order to minimise the risk of fire spreading, adequate freeboard is left at the top of containers. The contents of containers can be organised so that flammable materials are not stored next to each other.

5 Further information is needed on the containment of firewater.

- It is not clear from the drainage plan what is in place in terms of bunding or kerbing to ensure firewater can be contained on the site to be disposed of appropriately. You must demonstrate in your plan that you can contain the amount of water required to put out a worst-case scenario fire on the site.

There is kerbing around the perimeter of the site which is engineered to support the site fencing, the kerbing is a minimum 30 cm high plus. Firewater would also be contained within the building itself, as well as the site interceptor as stated in the FPP. The FPP show that the maximum amount of firewater required over 3 hours would be approximately 540m^3, the site is approximately 60 metres wide by 100 metres long at the shortest point, with a surrounding kerb of at least 0.3 metres high this gives well over 100m^3 capacity to hold firewater.

Hazardous waste

6 Provide an up-to-date TCM qualification and Continuing Competency certificate which covers storage and transfer of hazardous waste.

The operator is undertaking renewal of training 7th June as per acknowledgement receipt below:

The Chartered Institution of Wastes Management

wamitab

PLEASE DO NOT RESPOND TO THIS E-MAIL

Miss Jacqueline O Donovan

This e-mail contains important information about your appointment, the location and the rules. Please ensure your appointment details are correct. If any information is not correct, please contact Pearson VUE immediately.

IMPORTANT: It is your responsibility to ensure that you take the appropriate test, or tests, during the appointment you have booked. If you mistakenly leave the test booth before completing all the tests required, then Pearson VUE security conditions will not allow you to re-enter and you may be required to re-book.

Appointment Details
Order Number: 0058-1065-8822

Test:	**CIWM/WAMITAB CIWM/WAMITAB Continuing Competence Test - English-UK - (ENG)**
Candidate:	Jacqueline O Donovan
Candidate ID:	WAMITAB010452
Registration ID:	395625603
Date:	07 June 2021
Time: *	10:30 AM
Appointment Length:	60 Minutes

* Time shown is test centre local time.

7 A more detailed plan(s) is needed showing the interior layout and containment measures in the storage building (which on the plan is marked as storing hazardous waste and WEEE), and anywhere else hazardous waste is planned to be stored should be clearly identified.

The building is currently being used as a garage and will be converted pending the success of this application. The building has an impermeable concrete floor and no internal drainage. Hazardous waste will only be stored in this building or in the asbestos waste container in the yard (marked on the site layout plan). Bays will be marked out in the building for the different waste types and individual containers labelled. As stated in the application, separate storage for each waste stream will be within sealed metal or plastic drums, boxes and cabinets within the dedicated building. All storage areas will be labelled with the type of waste and the maximum capacity of storage allowed. A spill kit is provided in the dedicated storage building.

8 More detail is needed on the storage arrangements for each of the different new waste types, including separation and segregation where necessary for potentially incompatible wastes

Hazardous waste will only be stored in the dedicated building or in the asbestos waste container in the yard. Bays will be marked out in the building for the different waste types and individual containers labelled. As stated in the application, separate storage for each waste stream will be within sealed metal or plastic drums, boxes and cabinets within the dedicated building. All storage areas will be labelled with the type of waste and the maximum capacity of storage allowed. A spill kit is provided in the dedicated storage building.

The number of waste codes being applied for has been reduced (see question 12 below). Storage arrangements for all waste codes are provided in Table 1 below.

9 Detail is needed on the pre-acceptance assessment, acceptance procedures, handling and management for each of the different new waste types, in line with Environment Agency guidance EPR S5.06.

See attached.

10 A maximum storage capacity is needed for each of the new waste types

The site will keep well within the maximum storage capacity included in the existing S1 and S2 waste exemptions and in practise it will be significantly less. For the additional codes being applied for outside of this an overall maximum capacity of 25 tonnes will be put in place (reduced from 50 tonnes).

11 If necessary update the tonnage of hazardous waste applied for.

- The application is for 50 tonnes of hazardous waste storage, but the building identified for storage looks to be approx. 60m^2, the tonnage applied for should reflect the maximum storage capacity of the site.

The site has reviewed its required tonnage and can reduce the maximum capacity applied for to 25 tonnes. This is mainly to enable the site to deal with a large consignment of asbestos.

12 The proposed additional waste codes require justification for their inclusion.

- As discussed the waste code table needs limiting to only what the site will be accepting, either by removing some of the proposed codes, or by limiting certain codes in the description. The application documents state: *these cover the type of low volume wastes which the operator may currently collect from construction site clients*, however this doesn't fit with many of the codes applied for. Construction and demolition waste should be coded under the 17 codes, and incidental waste (waste which should not be in the load accepted and has not been coded for, should be separated from the load and put into a quarantine area.

The table below shows the waste codes the site wishes to handle. For clarity, the table is divided into codes currently allowable under the S1 and S2 exemptions, and new codes applied for.

The table shows waste type and EWC code, maximum storage capacity (Q10) and storage arrangements (Q8). The existing exemptions allow the site to store far more than is required. The site has committed to an overall limit of 25 tonnes capacity at any one time.

Table 1 Waste Types to be Accepted

EWC Code	Waste Types	Max Storage Capacity	Storage Arrangements
Codes falling under existing S1 exemption			
13 01 09*	mineral-based chlorinated hydraulic oils	3m^3 or 20 containers (not exceeding 3m^3) of: • waste oils • hazardous absorbents, filter materials, wiping	Stored in sealed 205 litre drums or boxes on mobile bunding, within the dedicated building in labelled bays. Each type of waste to be stored separately.
13 01 10*	mineral based non-chlorinated hydraulic oils		
13 01 11*	synthetic hydraulic oils		
13 01 12*	readily biodegradable hydraulic oils		
13 01 13*	other hydraulic oils		

13 02 04*	mineral-based chlorinated engine, gear and lubricating oils	cloths, protective clothing • oil filters	Self-bunded cabinets may also be used to stored drums and boxes of these waste types.
13 02 05*	mineral-based non-chlorinated engine, gear and lubricating oils		
13 02 06*	synthetic engine, gear and lubricating oils		
13 02 07*	readily biodegradable engine, gear and lubricating oils		
13 02 08*	other engine, gear and lubricating oils		
13 04 01*	bilge oils from inland navigation		
13 04 02*	bilge oils from jetty sewers		
13 04 03*	bilge oils from other navigation		
13 07 01*	fuel oil and diesel		
15 02 02*	absorbents, filter materials (including oil filters not otherwise specified), wiping cloths, protective clothing contaminated by hazardous substances		
16 01 07*	Oil filters		
Codes falling under existing S2 exemption			
16 06 01*	lead batteries	10 tonnes under exemption – in practise much less	Stored in sealed 205 litre drums or boxes, within the dedicated building in labelled bays. Each type of waste to be stored separately. Building has no internal drains.
16 06 02*	Ni-Cd batteries		
16 06 03*	mercury-containing batteries		
16 06 04	alkaline batteries (except 16 06 03)		
16 06 05	other batteries and accumulators		
14 06 01*	chlorofluorocarbons, HCFC, HFC	18 tonnes under exemption, in practise much less	Stored in sealed 205 litre drums or boxes on mobile bunding, within the dedicated building in labelled bays. Each type of waste to be stored separately.
14 06 02*	other halogenated solvents and solvent mixtures	$5m^3$ under exemption, in practise much less	Stored in sealed 205 litre drums or boxes on mobile bunding, within the dedicated building in labelled bays. Each type of waste to be stored separately.
14 06 03*	other solvents and solvent mixtures		
20 01 33*	batteries and accumulators included in 16 06 01, 16 06 02 or 16 06 03 and unsorted		Stored in sealed 205 litre drums or boxes, within

	batteries and accumulators containing these batteries	10 tonnes under exemption – in practise much less	the dedicated building in labelled bays. Each type of waste to be stored separately. Building has no internal drains.
20 01 34	batteries and accumulators other than those mentioned in 20 01 33		
20 03 07	Bulky wastes	5 tonnes in exemption	Bays
08 01 11*	waste paint and varnish containing organic solvents or other dangerous substances	10,000 litres in exemption, in practise much less	Stored in sealed 205 litre drums or boxes, within the dedicated building in labelled bays. Each type of waste to be stored separately. Building has no internal drains.
08 01 12	waste paint and varnish other than those mentioned in 08 01 11		
20 01 13*	Solvents		
20 01 27*	paints (excluding specialist and industrial paints, wood preservatives, aerosol and spray paints, inks, adhesives and resins) pending reuse as paints only		
20 01 28	paint, inks, adhesives and resins other than those mentioned in 20 01 27		
16 02 11*	discarded equipment containing chlorofluorocarbons, HCFC, HFC	400m^3 in exemption, much less in practise	Stored in sealed 205 litre drums or boxes, within the dedicated building in labelled bays. Each type of waste to be stored separately. Building has no internal drains. Building has impermeable concrete flooring and is weatherproof.
16 02 13*	discarded equipment containing hazardous components(2) other than those mentioned in 16 02 09 to 16 02 12		
16 02 14	discarded equipment other than those mentioned in 16 02 09 to 16 02 13		
16 02 16	components removed from discarded equipment other than those mentioned in 16 02 15		
20 01 21*	fluorescent tubes and other mercury-containing waste		
20 01 23*	discarded equipment containing chlorofluorocarbons		
20 01 35*	discarded electrical and electronic equipment other than those mentioned in 20 01 21 and 20 01 23 containing hazardous components		
20 01 36	discarded electrical and electronic equipment other than those mentioned in 20 01 21, 20 01 23 and 20 01 35		
New Hazardous Waste Codes to be Added			

17 06 01*	insulation materials containing asbestos	25 tonnes	Metal asbestos container in the yard. Lidded. Any asbestos containing waste will already be double bagged on receipt.
17 06 03*	other insulation materials consisting of or containing dangerous substances		
17 06 05*	construction materials containing asbestos		
17 08 01*	gypsum-based construction materials contaminated with dangerous substances		
17 09 03*	other construction and demolition wastes (including mixed wastes) containing dangerous substances		Hazardous elements segregated and stored as appropriate as described in other waste streams above.
New Non-Hazardous Waste Codes to be Added			
20 03 01	Mixed municipal waste (received from other O'Donovan sites)	Included within existing capacity and application to increase non-haz overall capacity.	Tipped and processed as per existing waste streams.
20 03 03	Street cleaning residues (received from other O'Donovan sites)		

13 More detail is needed in the risk assessment re-the hazardous wastes which the site has applied to accept and store.

- The risk assessment repeatedly says that hazardous waste will be stored in small volumes, however the volume applied for is at the limit for an installation.

The site will stick within the limits of it's existing S1 and S2 exemptions in terms of volumes. The revised maximum capacity of 25 tonnes is to cover the site in the event of a large transfer of asbestos waste. For all other hazardous waste types, overall volumes will likely be less than 10 205 litre drums. The risk assessment has been reviewed and updated.

14 Update the site condition report to include the hazardous substances applied to be accepted and stored on site as part of this permit variation.

- The H5 guidance requires a site condition report to identify 'Relevant Hazardous Substances (RHS)' – by consideration of the chemical and physical properties of each hazardous substance [composition, solubility, toxicity, mobility, physical state (solid, liquid or gas)] and determine whether any of these substances are capable of causing soil and/or groundwater contamination.

See Table 1 in Appendix B.

15 A stage 1- 3 assessment must also be included within the SCR.

- Further details of the Stage 1 – 3 assessment are set out within EC Commission Guidance on baseline reporting (2014/C 136/03) dated 6th May 2014. This is in accordance with Schedule 7 (paragraph 5 [m]) of the EPR regulations 2016 / Article 22 of IED. Please note where the outcomes from the Stage 1 – 3 assessment has concluded that RHS pose a risk to soil and / or groundwater the operator must include baseline reference data within the SCR (this last point is not essential for duly making but could be required in determination dependent on the outcome of the assessment.

See Table 1 and 2 in Appendix B. The site condition report submitted to the EA with the original application provided an assessment of the site sensitivity, a summary of geology and hydrogeology and the results of intrusive investigations carried out Lithos Consulting in 2014 as a geo-environmental appraisal of the site prior to commencing building.

Investigations concluded that there are existing pollutants including metals (lead, copper and zinc) and organics (oils and fuels) on the site. The current operations do not use or generate metals; however diesel and gas oil are used on site, and as such the baseline data included in the Lithos report can be used at permit surrender to demonstrate that operations have not affected this baseline. It was concluded that the retention of the existing hard standing, along with appropriate design of vibro stone columns for the process building and implementation of operational measures as described in Table 2, enables the operator to retain the baseline condition of the site and not contribute to additional contamination.

On the basis of this information it is concluded that the site poses a low risk to soil and groundwater.