

Non-Technical Summary

Permit Application

Formoss Ltd
Yard 7, Atlas Road
Wembley
Middlesex
HA9 0HJ

MAY 2021

Non-Technical Summary

The proposal is to operate an inert waste recycling facility on land at Yard 7, Atlas Road, Wembley, Middlesex, HA9 0HJ. The recycling operation will be for aggregate and soil production.

The recycling facility has been operating under a local authority regulated Part B permit and waste exemptions, S2, T5 and U1 but due to the expanding business, an environmental permit is being applied for.

The proposed environmental permit is based on the Standard Rules SR2010No12 but is a bespoke application. A bespoke application has to be made due to the location within an Air Quality Management Area (AQMA) and Local Wildlife Site. The included H1 Risk Assessment accounts for this.

EPOC details have been included to take advantage of the 12 months grace period allowed. A full WAMITAB qualification is being pursued to ensure TCM cover is constant.

There are no combustible wastes, so no Fire Prevention Plan is required.

The management procedures are presented below:

1 – Management

1.1 General management

1.1.1 The permit holder will manage and operate the permitted activities as follows:

(a) In accordance with this document which identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances, closure and those drawn to the attention of the operator as a result of complaints.

(b) The site will be staffed by persons who have been trained in the following topics:

- Waste Acceptance
- Permitted Activities
- Emergency Procedures
- Use of Plant & Machinery Applicable to Their Position

Initially, the TCMs will be qualified with an EPOC qualification. After the first 12 months of operating the site will be managed by a Technically Competent Manager (TCM) who will be qualified to a minimum of WAMITAB award 4MTMS4, Treatment & Transfer of Inert Waste. The TCM will maintain a level of continuous competence which will be documented.

The TCM will be present on the site for a minimum of 20% of the opening or operational hours.

The TCM will be contactable by telephone during the operational or opening hours of the site.

During periods when the TCM is off work for a period that exceeds 4 working days, a temporary TCM will be appointed. The permit holder will notify the Environment Agency of their intention to use a temporary TCM and will supply a copy of their certificate of qualification on request.

Any other arrangements for temporary TCM cover made between the permit holder and the Environment Agency will be confirmed in writing.

1.1.2 Details of all training will be recorded using a Training Record as contained within the appendix of the EMS.

The attendance of the TCM, detailing arrival & departure times will be recorded in the site diary.

1.1.3 A copy of the environmental permit together with this document will be stored in a clearly marked file on the site. It will be available for reference by all persons working at the facility.

1.1.4 The TCM will be qualified as detailed within section 1.1.1 unless this qualification is superseded or replaced.

2 – Operations

2.1 Permitted activities

2.1.1 The Company will only carry out the operations specified in table S1.1 below (“the activities”).

Table S1.1 activities	
Description of activities for waste operations	Limits of activities
<p>R3: Recycling or reclamation of organic substances which are not used as solvents</p> <p>R5: Recycling or reclamation of other inorganic materials</p> <p>R13: Storage of waste pending the operations numbered R3 and R5 (excluding temporary storage, pending collection, on the site where the waste is produced)</p>	<p>Physical treatment of wastes in table S2.1 shall be limited to manual and mechanical sorting, separation, screening, crushing and blending of non-hazardous waste for recovery as a soil, soil substitute and aggregate.</p> <p>Subject to any other requirements of this permit wastes listed in table S2.1 shall be stored for no longer than or 3 years prior to recovery.</p> <p>The capacity of the site for non-hazardous waste subject to an R3 activity (biological treatment only) shall not exceed 75 tonnes per day.</p> <p>Treatment of slags and ashes for recovery shall not exceed 75 tonnes per day.</p> <p>No more than 99,000 tonnes of waste listed in table S2.1 shall be treated per year.</p>

Description of Activities

Materials will be accepted to the site using the methods described within section 2.3 of this document.

Once deposited in the waste reception area, the material will be pushed up to form part of a uniformed stock pile using a loading shovel or tracked excavator.

Material will be loaded into the screening unit using a loading shovel or tracked excavator.

The material will then be segregated, by screening, into large and small fractions together with fines. The fines will be moved using a front end loading shovel and stored. Some fines may be loaded directly onto tipper vehicles for disposal off site.

The smaller and larger screened materials will be blended according to the requirements of the end product and loaded into a crusher. The crusher will produce a product which may, in some cases require additional screening.

Secondary screening will only take place when the areas under the stocking conveyors are clear of other materials so as to avoid contamination.

Materials that meet the specification of the required product will be stored within the product bays and be used for future primary product processing.

Materials that have been screened or crushed may at any point be suitable for removal from site either as a product or waste material.

All plant and machinery used to process and handle waste materials within the facility will be subject to a documented maintenance schedule which will meet the minimum requirements of the manufacturer's recommendations.

All plant and machinery will be free from fluid leaks and excessive emissions.

Should the storage capacity of the site, as detailed in table 2.1, be reached then no more waste materials will be accepted to site until there is sufficient capacity to receive it.

2.2 The site

2.2.1 The activities shall not extend beyond the boundaries of the site as shown edged in green on the site plan. The waste activities will not take place within 10 metres of any watercourse.

2.2.2 The site benefits from both impermeable surface (near to the site entrance) and hardstanding (remainder of site).

2.2.3 The site is located within a designated Air Quality Management Area (AQMA). This has been addressed in the H1 Risk Assessment.

2.2.4 The site is not located within a groundwater protection zone.

2.2.5 The site is not located within a designated flood plain.

2.2.6 The site boundary is located within 50m of any protected areas. This has been addressed in the H1 Risk Assessment.

2.3 Waste acceptance

2.3.1 Waste will be accepted at the site in accordance with the following procedure:

Waste Acceptance Procedure

All waste materials that enter the facility will be subject to this waste acceptance procedure.

Materials that originate from potentially contaminated sites will only be accepted at the facility on the production of a chemical analysis. This analysis will be examined by a suitably experienced person who will access the data and decide whether the material can be accepted to the facility. The material will be given a unique reference number which all subsequent tickets will reference. The site office will maintain a record of chemical analysis together with details of approval or rejection.

Waste Carrier's Licence

Vehicles entering the site will do so via the main access, the vehicle will then park on entering the site and the driver will report to the reception office.

All customers using the site will hold a valid waste carriers licence should they be required to do so.

Parties failing to produce a valid waste carriers licence will be refused further use of the tipping facilities until such time that they are registered.

The permit holder will keep a copy of the licence of regular customers for reference. Occasional customers will have to prove that they hold a valid waste carriers licence before tipping.

Duty of Care Waste Transfer Note

All customers will have to show a copy of their duty of care document to a member of staff.

The member of staff will check the material description and EWC code and confirm that this material is acceptable within the permit conditions.

Should the transfer note either not contain a EWC code, or that code be deemed to be incorrect then the member of staff will make the appropriate addition or amendment.

The member of staff will sign the duty of care document and retain a copy.

Issuing the Ticket

A reception / transaction ticket will be issued by a member of staff; this will detail the date, customer's name, material description and volume of material.

The member of staff will issue a ticket after completing all the required areas on the ticket, a copy will be given to the driver. A copy of the customer's duty of care will be retained with the reception ticket.

Visual Inspection of the Load

When the customer has tipped the load it will be immediately inspected by a site operative.

The operative will inform the customer that the load is compliant or non-compliant.

If the load is non-compliant with the permit conditions then the rejected load procedure will be followed.

If the description of the waste on the ticket does not match the content of the load, but is still a permitted waste, then the ticket will be amended and the operative will ask the ticket office to amend their copy.

All materials received at the site will be tipped on the hard standing.

Materials will be stored in a manner that does not compromise the health and safety of persons working within the site.

All storage areas are visually inspected on a daily basis by the site foremen.

Details of any damage to the site surface will be entered into the site diary. The repair will be instigated at the earliest opportunity, the details of which will also be entered in to the site diary.

The facility will only accept the following detailed waste streams and the total yearly tonnage will not exceed 99,000 tonnes per year.

Permitted Waste Streams

Table 2.3

Table 2.3 Waste types	
Exclusions	
<p>Wastes having any of the following characteristics shall not be accepted:</p> <ul style="list-style-type: none"> • Consisting solely or mainly of dusts, powders or loose fibres • Hazardous wastes • Wastes in liquid form 	
Waste Code	Description
01	WASTES RESULTING FROM EXPLORATION, MINING, QUARRYING AND PHYSICAL AND CHEMICAL TREATMENT OF MINERALS
01 04	wastes from physical and chemical processing of non-metalliferous minerals
01 04 08	waste gravel and crushed rocks other than those mentioned in 01 04 07
01 04 09	waste sand and clays
02 02	waste from preparation and processing of meat, fish and other foods of animal
02 02 02	shellfish shells from which the soft tissue or flesh has been removed only
10	WASTES FROM THERMAL PROCESSES
10 01	waste from power stations and other combustion plants
10 01 01	bottom ash and slag only
10 01 02	pulverised fuel ash only
10 01 05	gypsum (solid) only
10 01 07	gypsum (sludge) only
10 01 15	bottom ash and slag only from co-incineration other than those mentioned in 10 01 14
10 11	wastes from manufacture of glass and glass products
10 11 12	clean glass other than those mentioned in 10 11 11
10 12	wastes from manufacture of ceramic goods, brick, stiles and construction
10 12 08	waste ceramics, bricks, tiles and construction products (after thermal processing)
10 13	wastes from manufacture of cement, lime and plaster products and articles and products made from them
10 13 14	waste concrete only
15	WASTE PACKAGING
15 01	packaging
15 01 07	clean glass only
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
17 02	wood, glass and plastic
17 02 02	clean glass only
17 03	bituminous mixtures, coal tar and tarred products
17 03 02	road base and road planings (other than those containing coal tar) only

17 05	soil (including excavated soil from contaminated sites) stones and dredging
17 05 04	soil and stones other than those mentioned in 17 05 03
17 05 06	dredging spoil other than those mentioned in 17 05 05
17 05 08	track ballast other than those mentioned in 17 05 07
17 08	gypsum based construction material
17 08 02	gypsum only other than that mentioned in 17 08 01
19	WASTES FROM WASTE MANAGEMENT FACILITIES, OFF SITE WASTE WATER TREATMENT PLANTS AND PREPARATION OF WATER INTENDED FOR HUMAN CONSUMPTION / INDUSTRIAL
19 05	wastes from aerobic treatment of solid waste
19 05 03	compost from source segregated biodegradable waste only
19 08	wastes from waste water treatment plants not otherwise specified
19 08 02	washed sewage grit (waste from desanding) free from sewage contamination only
19 08 99	stone filter media if free from sewage contamination only
19 09	wastes from the preparation of water intended for human consumption or water for industrial use
19 09 02	sludges from water clarification
19 12	wastes from the mechanical treatment of wastes
19 12 05	clean glass only
19 12 09	minerals (for example sand, stones)
19 12 12	treated bottom ash including IBA and slag other than that containing dangerous
19 13	wastes from soil and groundwater remediation
19 13 02	solid wastes from soil remediation other than those mentioned in 19 13 01
19 13 04	sludges from soil remediation other than those mentioned in 19 13 03
20	MUNICIPAL WASTES (HOUSEHOLD WASTE AND SIMILAR COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL WASTES) INCLUDING SEPARATELY
20 01	separately collected fractions
20 01 02	clean glass only
20 02	garden and park wastes
20 02 02	soil and stones

Table 2.4

Table 2.4 Operating techniques	
When located within groundwater Source Protection Zones 1 or 2 the specified wastes below shall be stored and treated on an impermeable surface with a sealed drainage system.	
When located outside groundwater Source Protection Zones 1 or 2 all permitted wastes shall be stored and treated on hard-standing or on an impermeable surface with sealed drainage system.	
Waste Code	Description
10 01 01	bottom ash and slag only
10 01 05	gypsum (solid) only
10 01 07	gypsum (sludge) only
10 01 15	bottom ash and slag only from co-incineration other than those mentioned in 10 01 14
17 05 06	dredging spoil other than those mentioned in 17 05 05
17 08 02	gypsum only other than that mentioned in 17 08 01
19 05 03	compost from source segregated biodegradable waste only

19 09 02	sludges from water clarification
19 12 12	treated bottom ash including IBA and slag other than that containing dangerous substances only
19 13 02	solid wastes from soil remediation other than those mentioned in 19 13 01
19 13 04	sludges from soil remediation other than those mentioned in 19 13 03

3 – Emissions and Monitoring

3.1 All materials that are received at the facility under the conditions of the site permit will be deposited within the waste reception area.

Any repairs or cleaning will be instigated without delay and a note made in the site diary.

A daily visual check will be made of containers that hold oil, fuel or lubricants and the method of spillage containment. Should the container, bunding or other method of containment show leakage then the repair or re-containment will take place immediately.

3.1.2 The permit holder will manage and operate the facility in accordance with the EMS and other relevant documentation.

3.1.3 All liquids will be stored as per the preventative measures detailed within the Accident Management Plan contained within the EMS.

Accident Management Plan

All site operations and activities will be controlled for purpose of reducing the likelihood of accidents.

All hazards will be risk assessed to enable the incorporation of best available techniques and therefore minimise the risk to human health and the environment.

Fire

Prevention

There will be no smoking within any operational areas.

All plant and machinery will be maintained as per manufacturer's recommendations.

All electrical equipment will be safety tested (P.A.T)

Flammable and explosive materials such as oils, lubricants and gases will be stored separately from combustible substances and wastes.

Any welding or cutting will take place in an isolated area which is free of combustible materials.

In the Event of Fire

Minor fire outside

The loading shovel will push the burning material out into the open site; operatives will extinguish the fire using fire extinguishers or the fire hose. All operational activities will cease until the fire is extinguished.

Minor fire on plant, vehicles or machinery

Park the vehicle in the open away from other vehicles and combustible materials and extinguish the fire using a fire extinguisher.

All other fires

The persons discovering the fire should sound the fire alarm.

The office staff will call the fire service. All vehicles and mobile plant should be moved away from the fire if this can be conducted without risk to human health.

The site will be evacuated and all persons will assemble at the designated fire assemble point.

The person calling the emergency services will inform the fire service of the location of the fire and the presence of flammable substances.

The site staff will check that all persons working at or visiting the site are present in the assembly area.

Continued operation of the facility during any fire will be done so on the advice of the Fire Service.

Investigations and Notifications

The Environment Agency will be informed of the fire and an entry made in the site diary.

Residue from the fire will be disposed of in accordance with advice obtained from the Environment Agency.

The damage will be assessed and the permit holder's Insurers notified immediately if the damage warrants a claim.

The site will be checked for compliance with the site permit and authorisation sort from the Environment Agency to re-open the site if applicable.

A full and comprehensive report detailing the cause and future preventative actions will be submitted to the permit holder.

Spillage

Prevention

All liquids that are of polluting matter will be stored with secondary containment. The containment will be engineered to prevent leaks or spillage which may cause damage to the environment.

All oils, fuels and lubricants will either be stored in containers that are bunded, double skinned, held on trays or held within an area that has an impermeable surface and sealed drainage.

All containers will be free of leaks and maintained in good condition, dispensing equipment such as funnels, nozzles and jugs will be fit for purpose.

Refuelling and maintenance of plant and machinery will only take place in designated areas.

In the Event of Spillage

The activity that caused the spillage will cease immediately and will only recommence once the spillage has been cleared.

Absorbent granules or dried sand will be applied to the area of spillage, the amount applied will be sufficient to absorb any spilt material.

The absorbent material and any item or waste that has been contaminated by the spillage will be bagged and disposed of as hazardous waste.

Investigations & Notifications

All spillages will be recorded within the site diary.

Any spillage which results in an escape of hazardous material from the site through overflowing the boundaries or via the drainage system will be reported to the Environment Agency immediately.

Any spillage of liquid with potential to harm the environment will be investigated by the permit holder and the results of the investigation will be recorded in writing together with recommendations in report format.

3.2 Odour

3.2.1 Odorous material will not be accepted, any waste streams that are deemed odorous will be rejected using the rejected load procedure.

3.2.2 The permit holder will submit to the Environment Agency an odour management plan if requested to do so within an agreed period of time. The requirements of any such plan will be implemented once the plan has been formally approved by the Environment Agency.

3.3 Noise and Vibration

3.3.1 The site will not emit noise and vibration at a level which is likely to cause pollution outside of the boundaries of the site. Noise and vibration will be controlled using the procedure for the control of noise as detailed within the EMS.

3.3.2 The permit holder will submit to the Environment Agency a noise and vibration management plan if requested to do so within an agreed period of time. The requirements of any such plan will be implemented once the plan has been formally approved by the Environment Agency.

Procedure for the Control of Litter, Noise, Dust & Pests

Dust

All activities within the facility will be conducted in a manner which minimises the production and potential for dust.

Any dust generated will be suppressed so as contain it within the facility and stop migration.

The production and risk of dust will be minimised using a variety of methods.

The yard surface will be kept clean so as to prevent the resuspension of dust particles. A road sweeper visits the site at least once per day to clean the impermeable surface.

There is a permanent wheel wash on site which is regularly maintained. It is cleaned every two weeks with clean water added and mud and debris removed.

There is a bespoke dust suppression system installed which utilises sprinklers on the eastern boundary, near to Atlas Road.

During periods of dry and/or windy weather the site surface and external stockpiles will be sprayed with water using a hand held hose pipe.

The facility will not accept waste streams that solely or mainly consist of dried dust, powders or loose fibres.

All vehicles that enter and exit the facility carrying waste materials or recycled product will do so sheeted. Vehicles leaving the facility will be washed down prior to leaving the site if necessary so as to avoid the migration of debris and potential resuspension of particles.

When the site is screening or crushing material the dust suppression system will be operational.

Litter

Materials that are likely to cause litter will not be accepted at the facility.

All vehicles depositing and removing materials from site will be sheeted.

All sheets will be deployed or removed at the point of loading or discharge.

All loads will be trimmed so as to insure that all waste materials are securely contained.

Site fencing will be maintained so as to stop litter leaving the site.

The site will be inspected on a daily basis for litter and any incident of litter leaving the site will be recorded in the site diary.

Any litter present in the site will be cleared immediately.

Noise

All plant and machinery will be maintained as per manufactures recommendations.

All drivers and operators will conduct their activities in a manner to minimise the emission of noise.

All waste containers will be raised and lowered in a steady manner. Travel speed within the site should be minimised (below 5mph)

Tipper vehicles will close and secure the tailgate before travelling across the site.

There will be no loud music on the site.

Activities that generate noise will be risk assessed and appropriate action taken to minimise the effect. Appropriate ear protection will be worn if the activity is assessed and the need established.

Pests

The site will not accept waste streams that are likely to attract pests or vermin.

3.3 Site Security

The site is kept secure in non-operational hours. This is by lockable security gates at the site entrance. The site boundary is kept secure by adequate fencing and boundary fixings. During operational hours, any visitors to site have to report to the weighbridge office. The site will be manned and observed within operational hours. Extra supervision will be provided to other users of the entire site. This will include the observation of any potential illegal deposits of waste within the site boundary during opening hours. A number of staff are present on site 24 hours per day. CCTV is present on site.

4 – Information

4.1 Records

4.1.1 All records contained within the Appendix of this management system shall be completed in a legible manner within 1 working day of the occurrence.

All records will be retained for a minimum period of 6 years and be made available to the Environment Agency on their written request. Records of any incident which affected the condition of the land or groundwater within or outside of the site boundary will be retained for the duration of the permit.

4.1.2 All of the recording systems contained within the appendix of the EMS will be filed in separate clearly marked folders which will be stored and maintained within the site office. It will be the responsibility of the site TCM to ensure that all records are completed as per the procedures contained within the EMS.

4.2 Reporting

4.2.1 All reports and notifications required by the EMS and permit will be submitted to the Environment Agency at the contact address supplied by the inspecting officer.

4.2.2 Within 1 month of the end of any quarter, commencing 01 April each year, the permit holder will submit a return to the Environment Agency detailing all materials received and disposed of from the site. The information will be submitted electronically using a form downloaded from the Environment Agency website. Once submitted a hard copy will be retained in a separate clearly marked file which will be kept in the site office.

4.3 Notifications

4.3.1 The following incidents require the immediate Notification to the Environment Agency:

- Any breakdown, malfunction or equipment failure that has resulted in an emission which has caused or may cause significant pollution.
- Any breach of a limit specified within the EMS
- Any significant adverse environmental effect
- Fire

Notifications should be made by telephone on 03708 506 506

4.3.2 Any reported incident should be confirmed in writing to the Environment Agency within 24 hours of the incident.

4.3.3 If requested to do so in writing, by the Environment Agency, the operator will conduct monitoring or sampling. The operator will give the Environment Agency a minimum of 14 days' notice of the date that the monitoring or sampling is to take place. The TCM will make the notification and retain a copy.

4.3.4 The operator will notify the Environment Agency in writing of any of the following changes:

- Change in name
- Change in address
- Intention to go into administration, voluntary arrangement or being wound up

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