

Project details	Environmental Permit Application Cleantank Limited – Amsterdam Road Recycling Facility EPR/KB3607SG/A001
Applicant details	Cleantank Limited Amsterdam Road Hull Amsterdam Road Hull HU7 0XF
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1 Introduction

1.1 General

Cleantank Ltd (the applicant) has requested that Reva Environmental Ltd (the agent) prepares an Environmental Permit (EP) application, for its recycling facility at Amsterdam Road, Sutton Fields Industrial Estate, Hull, Humberside, HU7 0XF.

The site is located in an commercial/industrial area, at National Grid Reference TA 10246 32508. The site setting is described on **Drawing CLNT-HULL-EP03** provided in **Appendix D** of this application. Access to the Building 2 facility (and associated yard area) is from Amsterdam Road to the north. The facility is not currently permitted for waste management. The building is in a good state of repair.

The facility will operate a two-line physical waste treatment activity for the recovery of plastic from hazardous and non-hazardous empty packaging that cannot be reconditioned, supported by associated activities governing waste acceptance, storage, handling, and onward transfer of the treated material (product).

This non-technical summary provides an overview of the application.

1.2 Application Objective

The objective of this application is to obtain a bespoke Environmental Permit (EP) which allows the applicant to:

- Accept hazardous and non-hazardous empty packaging (e.g. intermediate bulk containers (IBCs), small plastics, drums) that cannot be reconditioned, to enable plastic recycling by subjecting it to physical treatment comprising shredding, granulation and cleaning.

The materials are those that have been discarded or don't pass quality assurance (QA) tests for being reconditioned; instead they are shredded, granulated and cleaned so that the processed materials can be recovered.

The physical treatment in Building 2 will take place in up to two lines that will run in parallel (and can run independently from each other). If only one line is operational, this can process batches of IBCs and drums/small containers; if both lines are operational it is likely that one will be dedicated for IBCs and one for drums/other containers. In that scenario, this will not be limited as maximum flexibility will be key to achieving full efficiency so both plants remain able to process either waste stream. If run to their maximum operating capacities, 20 hours a day, 7 days a week, the 2 lines could process 8 tonnes per day combined; the likely split would be 2.4 tonnes non-hazardous and 5.6 tonnes hazardous waste (a 30:70 split).

Following processing in Building 2 the material is considered to be a product not a waste. It can be transferred off site in this state as a product. Further details of this, in relation to the EU End of Waste Regulations, Quality Protocols, and the completed end of waste assessment in accordance with article 6(1) and 6(2) of the WFD 2008, is provided in the BAT Assessment in **Appendix I** of this application (ref. DLR_2021/02.06).

In terms of identifying the type of environmental permit (EP) that is needed, the relevant parts of the EP Regulations are Sections 5.3, 5.4 and 5.6 of Chapter 5.

- With respect to Section 5.3 this refers to the hazardous waste portion of the activities. The proposed treatment is physico-chemical. The site will process < 10 tonnes per day of hazardous waste so whilst physico-chemical treatment is a listed activity (5.3 Part A(1)(ii)), this hazardous activity is a Waste Operation.

- With respect to Section 5.4 this refers to the non-hazardous waste portion of the activities. Again the proposed treatment is physico-chemical. This is a listed activity (5.4 Part A(1)(ii)) however the threshold for this section is 50 tonnes per day which the applicant will be operating significantly below; this non-hazardous activity is therefore also a Waste Operation.
- The EP will also need to allow the storage of waste (hazardous and non-hazardous). Storage of hazardous waste (5.6 Part A(1)(i)) will be significantly below the 50 tonne threshold for a listed activity, so storage will also be a Waste Operation.

Based on this review of the proposals against the EP Regulations, and pre-application communications with the EA, it is considered that the application is for a new bespoke Waste Operation for the physico-chemical treatment of hazardous waste. The treatment of non-hazardous waste and the storage of waste are included as part of this primary Waste Operation.

2 Application Contents

The content of the application has been guided by EA guidance on permitting. Conservation screening has been carried out the by EA following a request for pre-application advice by the applicant.

The application comprises the following documents.

- EP Application Form – Parts A, B2, B4 and F1. The application form is provided at the front of the EP application document.
- Supporting Statement (ref. DLR_2021.02/01). This has been written to provide an explanation of the application to the EA and to provide signposts to the supporting information supplied in accordance with the application form. It includes a process flow diagram to illustrate the proposed treatment.
- A copy of the EA's pre-application advice (Appendix A).
- Copies of certificates of technical competence for those persons providing support to the operations (Appendix B).
- A summary of the environmental management system (EMS) (Appendix C). This currently applies at Holding Company level and has recently received accreditation to ISO 14001 at the Cumberland Street facility. The accredited EMS will be implemented for the proposed operations at the Amsterdam Road facility.
- A set of site plans showing the location of the facility (in particular in relation to sensitive receptors), the activity layout, the EP boundary, drainage, and the fire prevention measures (Appendix D).
- A site condition report (Appendix E, ref. DLR_2021.02/02). This sets out the current status of the land and is required due to the EP application being for a new Waste Operation. This report allows a direct comparison of land condition at the point of surrender of the EP in the future. The conclusions of the report are as follows:
 - Whilst there have not been any reported pollution incidents in the locality since 2009 (in relation to land or water which could contribute to long term contamination), it is considered possible that groundwater beneath the site could have been impacted, for the following reasons:
 - The site is surrounded by industrial and commercial development; the historical and current use of the area includes activities that typically have the potential to pollute (storage and use of fuels, chemicals, production of effluents etc.);

- The site is situated on a principle bedrock aquifer (medium vulnerability) which is recorded as being a productive bedrock aquifer with well-connected fractures (a ‘high’ pollutant speed). This provides any contamination with a pathway; and
- The site is located immediately adjacent to an historic landfill site that accepted inert and industrial waste for several decades.
- It is however recognised that the existing buildings are relatively new (they were built sometime after 2006) and that the condition of the building and floor and yard areas are good.
- In certain circumstances it is considered appropriate to collect baseline data. Baseline data serves to ensure that the operator of a permitted facility is able to identify any contamination caused during the life of the permit; it also protects the operator from being held responsible for remediating any pre-existing contamination at the point of surrender of the site EP.
- Whilst there is the potential for the site to be contaminated, the nature of the contamination (based on the types of activities carried out around the site historically and currently) is very different to that which would be associated with the proposed permitted activity. With this in mind it is not considered necessary for the applicant to collect baseline data.
- A Fire Prevention Plan (Appendix G, ref. DLR_2021.02/04). This follows the EA guidance and sets out the fire prevention and control measures in place. It also includes calculations of the worst case potential fire, the quantity of water needed to manage that fire, and consideration of the holding and management of the resultant fire waters.
- A qualitative environmental risk assessment (Appendix H, ref. DLR_2021.02/05). This follows the EA’s source-pathway-receptor methodology to identify potential risks posed by the operation of the site, and to assess the potential impacts of those risks following implementation of suitable control/mitigation measures. An H1 environmental assessment has also been carried out and is included in this appendix; it models the potential impact from the worst case dust and VOC emissions from the filtered local exhaust ventilation (LEV) system over the processing line, shredders and granulators. Worst case is represented as operating hours over the year and published environmental limits for those parameters. Particulates (PM_{2.5} and PM₁₀) were modelled, along with benzene (as a surrogate for VOCs). All three are screened out at stage one.
- A copy of the best available techniques (BAT) assessment (Appendix I, ref. DLR_2021.02/06) which sets out how the site activities accord with the best techniques for the sector (as defined by the EU Commission and the EA) to ensure pollution prevention and control. The conclusion of the assessment is that the proposals do represent BAT.
- A Dust Management Plan (Appendix J, ref. DLR_2021.02/07). This follows the EA guidance and supplied template and identifies the potential dust sources, their pathway and sensitive receptors; and sets out the measures in place to control emissions.
- A Noise Impact Assessment (Appendix K). This follows the EA guidance for noise monitoring and impact assessment. A Noise Management Plan has also been provided and follows EA guidance in identifying potential sources, sensitive receptors and the measures in place to control emissions.