



Non-Technical Summary

Geminor UK, St Mark Street, Hull: Environmental Permit Variation Application

Geminor UK Limited

Prepared by:

SLR Consulting Limited

3rd Floor, Brew House, Jacob Street, Tower Hill,
Bristol, BS2 0EQ

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Basis of Report

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1.0 Introduction

Geminor UK Limited (Geminor) has retained SLR Consulting Limited (SLR) to prepare an application to vary the Environmental Permit (EP) (Ref: EPR/GP3303PN) issued under the Environmental Permitting (England and Wales) Regulations (as amended) 2016 for the Materials Recycling Facility (MRF), located on St Mark Street, Hull, HU8 7ED.

This document provides a Non-Technical Summary (NTS) of the proposed variation, including:

- An explanation of what is being applied for;
- A summary of the regulated facilities; and
- A summary of the key technical standards and control measures relating to the proposed changes.

To support this EP variation application, the following **updated** documentation is submitted in addition to this NTS:

- Environment Agency (EA) Variation Application Forms, Parts A, C2, C3, C4 and F1;
- Environmental Risk Assessment (ERA);
- Best Available Techniques and Operating Techniques (BATOT) document;
- Fire Prevention Plan (FPP); and
- Associated Drawings.

1.1 The Site

The site is situated approximately 1.5km north east of Hull city centre within a predominantly commercial area. The site is bounded by St Mark Street to the south which links to the A1165 to the west. The National Grid Reference (NGR) for the site is TA 10546 29719.

The immediate surrounding land use is predominantly commercial land. There is a residential area approximately 30m to the south along Redcar Street and the River Hull is located approximately 200m north west of the site.

Access to the site is via St Mark Street. The site's location is illustrated on Drawing 001 and the EP boundary and Site Layout is illustrated on Drawing 002.

The surrounding land uses and local receptors within 500m are identified on Drawing 003, in addition to the cultural and natural heritage within 1km,

A summary of the site's immediate surrounding land uses is identified in Table 1 below.

Table 1 Surrounding Land Uses

Boundary	Description
North	Commercial premises dominate the area, beyond which lies a local cycle path and a railway to the north east.
East	Large areas of commercial premises, with a local cycle path adjacent to the EP boundary, an area of open ground and a small residential area.
South	A small residential area surrounded by commercial premises. Beyond this lies a number of listed buildings, and the A165.
West	Large areas of commercial premises, the River Hull and a number of listed buildings.



1.2 Current EP

The site operates under a bespoke EP (EA Ref: EPR/GP3303PN) originally issued to Geminor on 6th June 2020. Several administrative variations have been carried out since, and the EP was most recently varied in November 2023 to update Geminor's registered office address.

The EP allows the site to accept dry mixed municipal waste to produce Refuse Derived Fuel (RDF) for onward transfer. The site also operates as a Waste Transfer Station for household, construction, and industrial waste destined for recovery at other sites.

The site is currently permitted to accept up to 150,000 tonnes of waste per annum, and a maximum of 680 tonnes of waste can be stored at any one time.



2.0 Overview of Proposed EP Variation

This EP variation application seeks to make the following changes:

- Increase the maximum annual throughput;
- Add an additional activity to reflect the production of RDF for recovery – variation to the current AR3 activity;
- Include additional EWC codes; and
- Increase the site’s maximum waste storage capacity.

There is no proposed changes or additions to the waste treatment activities currently carried out at the facility.

2.1 Annual Throughput Increase

To increase operational flexibility, and future proof site operations Geminor propose to increase the maximum annual throughput of waste from 150,000 tonnes per annum (tpa) to 250,000.

The additional 100,000 tonnes is to incorporate;

- 50,000 tonnes of Astro Turf accepted under a campaign basis under new Activity AR4; and
- 50,000 tonnes for the existing RDF production activity under Activities AR1 and AR4 combined.

Activities AR1, AR2, AR3 and AR4 included in Table S1.1 of the EP, are described in Table 3. below.

2.2 Addition of Listed Activity (variation of AR3)

This variation seeks to include the addition of the listed activity required for the production of RDF for recovery under Schedule 1 of the EPRs, Section 5.4, Part A(1)(b)(iii).

2.3 Addition of EWC Codes

Table 2 details the additional waste codes to be added to the EP.

Table 2 Proposed Additional EWC Codes

EWC Code	Description
15	WASTE PACKAGING, ABSORBENTS, WIPING CLOTHS, FILTER MATERIALS AND PROTECTIVE CLOTHING NOT OTHERWISE SPECIFIED
15 01	Packaging (including separately collected municipal packaging waste)
15 01 02	Plastic packaging
15 01 06	Mixed packaging
17	CONSTRUCTION AND DEMOLITION WASTES (INCLUDING EXCAVATED SOIL FROM CONTAMINATED SITES)
17 09	Concrete, bricks, tiles and ceramics
17 09 04	Mixed construction and demolition wastes other than those mentioned in 17 09 01 17 09 02, and 17 09 03
19	WASTES FROM WASTE MANAGEMENT FACILITIES, OFF-SITE WASTE WATER TREATMENT PLANTS AND THE PREPARATION OF WATER



EWC Code	Description
	INTENDED FOR HUMAN CONSUMPTION AND WATER FOR INDUSTRIAL USE
19 12	Wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified
19 12 04	Plastic and rubber

2.3.1 Additional waste types for the production of RDF

The following EWC codes are similar in nature to those already accepted on site for the production of RDF (under Activities AR1 and AR3). Loose RDF will be subject to the same waste treatment activities and stored within the reception waste storage bay, and outgoing/processed waste storage bay as illustrated on Drawing 002.

- 19 12 04: Plastic and rubber.
- 15 01 02: Plastic packaging.
- 15 01 06: Mixed packaging.

2.3.2 Acceptance of Astro Turf

Geminor propose to accept up to 50,000 tpa of waste Astro Turf from UK sports pitches on a campaign basis.

The EWC code that would need to be included in the EP is;

- 17 09 04 (mixed construction and demolition wastes other than those mentioned in 17 09 01, 17 09 02, and 17 09 03).

Key points from the addition of this waste code;

- Astro Turf will be accepted, wrapped and removed from site for further processing and **recovery** only. There will be no treatment of waste Astro Turf on site.
- Astro Turf will be accepted on a **campaign basis** and will arrive suitably sized so that no further treatment would be required prior to wrapping.
- When astro turf is accepted at the facility, RDF processing will temporarily cease and the Astro Turf will be transferred off incoming vehicles in the waste reception building, where it will be baled and wrapped immediately.
- Site Management will ensure that the Astro Turf will be kept separate from existing operations.
- The baled and wrapped Astro Turf will be transferred to the stand trailers (the locations of which are illustrated on Drawing 002) which are located externally for a maximum of 24 hours prior to transfer off site (48 hours for contingency i.e. if a load is not transported off site on the day of loading).

2.4 Waste Storage Capacity Increase

Geminor propose to increase the maximum waste storage capacity from 680 tonnes to 1,750 tonnes at any one time.

This increase reflects the increase in annual tonnage proposed in this variation application, which the building has capacity to hold.



2.5 Summary of Changes

Table 3 below is taken from Table S1-1 from the current EP and highlights and comments on how the changes correlate with the current activities;

Table 3 Activities from Table S1.1 of the EP with SLR Comments on the Changes

Activity Reference	Activity listed in Schedule 1 of the EP Regulations Description of specified activity and WFD Annex I and II operations	Limits of specified activity and waste types	SLR Comments
AR1	<p>S5.4 Part A(1)(a)(iii)</p> <p>D9: Physical/physico-chemical treatment of waste prior to any other disposal operation;</p> <p>D14: Repackaging prior to submission to any of the operations numbered D1 to D12;</p> <p>D15: Storage pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where the waste is produced).</p>	<p>Pre-treatment of waste to produce RDF.</p> <p>Treatment operations shall be limited to physical and mechanical treatment consisting of sorting, screening, shredding and separating, baling and wrapping.</p> <p>Non-hazardous waste types as specified in Schedule 2 Table S2.2.</p>	<p>No change to treatment process on site.</p>
AR2	<p>S5.4 Part A(1)(b)(ii)</p>	<p>Pre-treatment of waste to produce RDF.</p> <p>Treatment operations shall be limited to physical and mechanical treatment consisting of sorting, screening, shredding and separating, baling and wrapping.</p> <p>Non-hazardous waste types as specified in Schedule 2.</p>	<p>Addition of activity to reflect the recovery of RDF.</p>
Directly Associated Activity			
AR3	<p>Storage of non-hazardous waste prior to treatment</p> <p>R3: Recycling/reclamation of organic substances which are not used as solvents;</p>	<p>Storage shall be on an impermeable surface with sealed drainage.</p>	<p>Additional tonnage increase for the storage of unprocessed and processed loose material and the storage of RDF bales.</p>



Activity Reference	Activity listed in Schedule 1 of the EP Regulations Description of specified activity and WFD Annex I and II operations	Limits of specified activity and waste types	SLR Comments
	<p>R4: Recycling/reclamation of metals and metal compounds;</p> <p>R5: Recycling/reclamation of other inorganic materials; and</p> <p>R13: Storage of wastes pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced).</p>		
Waste Operation			
AR4	<p>R13: Storage of wastes pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced).</p>	<p>Transfer of waste.</p> <p>Waste types as specified in Table 2.2.</p>	

2.6 Updated to Site Layout Drawing

Update the Site Plan included in Schedule 7 with Drawing 002, which has been updated to reflect the changes post-construction.



3.0 Application Contents

3.1 Application Forms

Parts A, C2, C3, C4 and F1 of the EA's EP variation application forms have been completed, in support of this variation application and are enclosed as Section 2.

3.2 Type of Variation Application and EA Fee

It is considered that this EP variation application constitutes a substantial variation. As such, the following charges apply, in accordance with the EA's Environmental Permitting and Abstraction Licensing (England) Charging Scheme 2022¹:

- Substantial variation to add Section 5.4 Part A 1 (b)(ii) – production of RDF: **£13,288**
- Addition of a new waste operation (Ref: 1.16.8) household waste amenity site taking non-hazardous waste only (includes assessment of fire prevention plan and odour management plan): **£7,930**.

In addition, the following updated assessments submitted with this variation application, will require an additional fee:

- Habitats Assessment: **£779**.

Therefore, the total fee for the variation application is **£21,218**.

3.3 Environmental Risk Assessment

The ERA has been prepared to assess any potential increase in risks associated with the increase in annual throughput, maximum storage capacity and additional waste codes.

Strict operational procedures will continue to be implemented at the site to monitor and manage amenity risks from the activities and include provisions for the monitoring of scavenging birds, vermin, insects and litter, mud on road, odour and noise. The impact of the proposed EP variation is assessed in the ERA. Potential receptors are illustrated on Drawing 003.

Subject to the continued implementation of the stated management measures, the conclusion has been reached that the proposed EP variation is unlikely to result in a significant accident risk or risk to the amenity of the local environment.

The ERA (Ref: 416.065261.0001/ERA) is enclosed as Section 3 of the EP variation application.

3.4 Best Available Techniques and Operating Techniques

The currently approved BATOT document has been amended and updated to reflect the proposed increase in annual throughput, maximum storage capacity and additional waste codes. The BATOT details the management measures that are implemented at the facility to minimise the risk of accidents or emissions that could impact site operatives, local receptors and the environment.

The document includes the following information:

- Management;

¹ [The Environment Agency \(Environmental Permitting and Abstraction Licensing\) \(England\) Charging Scheme 2022 \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/103111/epal-charging-scheme-2022.pdf)



- Site operations;
- Process controls;
- Emissions; and
- Information.

Operational management procedures will continue to ensure that:

- The risks that the activities pose to the environment are identified;
- The measures that are required to minimise the risks are identified;
- The activities are managed in accordance with the management system and the BATOT;
- Performance against the management system is audited at regular intervals; and
- The EP is complied with.

This NTS should be read in conjunction with the BATOT.

The updated BATOT (Ref: 416.065261.0001/BATOT) is enclosed as Section 4 of the EP variation application.

3.5 Update to the Approved Fire Prevention Plan

Current EA guidance regarding FPPs² requires any operator who stores combustible waste to have an approved FPP in place.

The currently approved FPP has been updated to reflect the proposed increase in annual throughput, maximum storage capacity and additional waste codes.

It should be noted that in 2023 the FPP was updated by Geminor and submitted to the local EA officer to reflect the changes made during the construction phase. This was approved by the local EA and this variation seeks to regularise these changes.

The information contained within the FPP for the facility aims to continue to ensure that the following 3 main objectives are met:

- Minimise the likelihood of a fire happening;
- Aim for a fire to be extinguished within 4 hours; and
- Minimise the spread of fire within the site and to neighbouring sites.

The updated FPP (Ref: 416.065261.0001/FPP) is enclosed as Section 5 of the EP variation application.

3.6 Associated Drawings

The following drawings have been prepared to support the EP variation application, and to illustrate the waste storage areas and activities:

- Drawing 001 Site Location Plan;
- Drawing 002 Updated Site Layout, Fire Management and Fire Prevention Plan; and
- Drawing 003 Environmental Site Setting.
- Drawing 004 Site Drainage Plan

² [Fire prevention plans: environmental permits - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/fire-prevention-plans-environmental-permits), last updated January 2021



3.7 Additional Documents

3.7.1 Odour Management Plan

The Odour Management Plan did not require any fundamental updates in light of the changes proposed in this variation application, as all existing management and mitigation methods are still relevant and applicable (as reviewed in the Environmental Risk Assessment) and so therefore the approved OMP has not been updated and does not require additional review.

3.7.2 Pest Management Plan

The currently approved Pest Management Plan was reviewed in the Environmental Risk Assessment and the current mitigation and management methods to not need to be updated or added to in relation to the changes proposed in this variation application.



4.0 Technical Standards and Control Measures

The key technical standards laid out in this NTS will continue to govern the design and operation of the site:

- The Environmental Permitting (England and Wales) Regulations 2016 (as amended);
- EA Guidance, Risk assessments for your environmental permit, updated 31st August 2022;
- EA Guidance, Control and Monitor Emissions from your EP, November 2022;
- EA Guidance, Developing a Management System: Environmental Permits, April 2023;
- Sector Guidance Note S5.06; Guidance for the Recovery and Disposal of Hazardous and Non-Hazardous Waste (October 2018);
- EA Guidance, Non-Hazardous and Inert Waste: Appropriate Measures for Permitted Facilities, August 2023;
- Relevant EA Guidance e.g. Environmental Risk Assessments, Fire Prevention Plans, Odour Management Plans etc...

The site will continue to be managed and operated in accordance with Geminor's Environmental Management System (EMS).

The control measures relevant to the proposed variation are described in the updated BATOT document submitted with this EP variation application.

The overall conclusion is that there is unlikely to be a significant environmental impact as a result of the proposed EP variation application at the MRF at St Mark Street, Hull.

Geminor is fully committed to ensuring the highest standards are met and will continue to undertake its activities in a manner consistent with best industrial practices and in accordance with the Company's Environmental Policy, EMS, and associated procedures.





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