

MEARCLOUGH ROAD WASTE TREATMENT FACILITY

Supporting Information Document

EPR/NP3699ZH

Ellete Waste Limited

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NON-TECHNICAL SUMMARY

Introduction

This document and associated appendices form the application to vary an Environmental Permit (EP) EPR/NP3699ZH under the Environmental Permitting Regulations 2016 (as amended)¹. The application is made by Ellete Waste Limited which is the legal entity that will be responsible for operating the waste facility.

The facility is located at the former Mearclough House, Mearclough Road, Sowerby Bridge, Halifax, HX6 3LF.

Permit EPR/NP3699ZH includes for the operation of a household, commercial and industrial waste transfer station (WTS), without treatment, with a capacity of 5,000 tonnes of non-hazardous waste per year. This variation seeks to make the following changes to the permit:

- an increase the permitted capacity of waste that can be accepted to 35,000 tonnes per year. No more than 280 tonnes per day will be accepted at the facility. The amount of waste which can be stored at any one time will increase from 200m³ to 300m³. The permit boundary will also not change as a result of the proposed changes,
- mechanical treatment activities which include sorting by use of a rotary screener (trommel),
- new waste codes for non-hazardous metal shredder residues, known as fragmentation fluff, or frag fluff, to be accepted under non-hazardous EWC codes 19 10 04 and 19 10 06 and 19 12 12 for waste from mechanical treatment of wastes,
- the sorting by hand and by mechanical means of fragmentation fluff waste to separate plastic and metal from the waste.
- removal of waste transfer station activities, the facility will become a waste treatment facility (WTF) which stores and treatments non-hazardous wastes.

The proposed environmental risks associated with the above changes have been assessed. There are no process emissions to land, air, water or sewer from the facility and this is remaining unchanged with the variation application. The results of the environmental risk assessment (ERA) are presented in Appendix C and show that the risk of odour, noise and vibration, fugitive emissions, and accidents range from 'not significant' to 'low'.

Site Location

The site is located off Mearclough Road with the River Calder, an industrial area, Wakefield Road (A6026) and residential properties to the north. To the east of the site are Milner Royd nature reserve, Rochdale Canal and Copley Valley Green Corridor local wildlife sites to the east. A railway line running from Sowerby Station, west of the site, runs south of the site, beyond which are a few residential properties at Tall Trees Farm, Fall Lane. To the west lies woodland, beyond this are industrial units and sports facilities on Holmes Road.

The site is not located in a DEFRA Air Quality Management Area (AQMA). The nearest AQMA is adjacent to West Mills, West Street, Sowerby Bridge and extending along Town Hall Street and Wharf Street and ending in Upper Bolton Brow on Pye Nest Road and on Wakefield Road in Bolton Brow in Sowerby Bridge, approximately 140 m from the proposed facility. This area, according to Calderdale Metropolitan Borough Council (CMBC), has been designated under Section 83 Environment Act 1995 due in part to a known exceedance of the annual mean air quality objective for nitrogen dioxide (NO₂) as specified in the Air Quality Regulations 2000. It was also in part due to modelled evidence of a likely exceedance of that value.

¹ <https://www.legislation.gov.uk/uksi/2016/1154/contents/made>

Operations

The site is currently a permitted waste operation, and the proposed changes will not alter this. The proposed activities are below the thresholds of installation activities within Part 2 of Schedule 1 and so the activities will remain as a waste operation. The main activity undertaken at the site will be the storage and treatment of non-hazardous wastes; D15 (storage pending any of the operations numbered D1 to D14) and R13 (storage of waste pending any of the operations numbered R1 to R12). Waste streams will mainly be sourced from skips provided to local business and households which are collected by Ellete Waste controlled vehicles.

Waste accepted at the site for treatment is tipped within the reception area inside the waste treatment building. Both tipping, treatment and some storage will be taking place inside the WTF building. The external yard is used for the storage of treated wastes or wastes that may not require treatment i.e. a full load of inserts.

Treatment activities are carried out by a trommel followed by a manual picking station. Segregated recyclables will be placed into dedicated skips located either within the building or within skips in the external yard.

Incoming skip waste and fragmentiser fluff waste will then be sorted separate to each other, by hand and by mechanical means to separate plastic and metal from the waste. The sorted metals and plastics are separately combined with other metal and plastic wastes and placed in the respective containers for transfer off site.

Residual waste will be stored within the building in a 40yard Ro-Ro skip. Residual fragmentation fluff will also be stored within this skip. Please note that if fragmentation fluff is to be treated, this skip will be emptied prior to provide storage.

Bulked up waste will be sent onwards to waste recycling facilities for recovery.

Management of Activities

An approved Working Plan is in place for the facility and EWL will operate in accordance with that. EWL are developing an environmental management system (EMS) which will be in place prior to the permit being issued. The EMS will include those documented systems required by the Environmental Permit to identify and minimise risks of pollution including those from operations, maintenance, accidents, incidents and non-conformances; site closure and risks drawn to the attention of the operator as a result of complaint. It will also document how EWL will ensure the facility is managed using sufficient competent persons and resources and to the requirements of relevant Environment Agency guidance documents;

- Non-hazardous and inert waste: appropriate measures for permitted facilities².
- Guidance for the Recovery and Disposal of Hazardous and Non Hazardous Waste³. Although the facility is below the threshold of EPR Schedule 1 Part A activities.

The EMS will 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;
- Performance against the management system is audited at regular intervals; and
- The environmental permit is complied with.

A fire prevention plan (FPP) has been produced as part of this variation application and is in Appendix F. The FPP sets out the current measures that are in place at the site, and addresses the proposed changes, to

² [Non-hazardous and inert waste: appropriate measures for permitted facilities - Guidance - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/non-hazardous-and-inert-waste-appropriate-measures-for-permitted-facilities)

³ [Guidance for the Recovery and Disposal of Hazardous and Non Hazardous Waste](#)

minimise the risk of a fire starting and to ensure that should a fire occur appropriate measures are in place so that it is identified and managed effectively. The FPP will be incorporated within the EMS for the WTF.

The management system will be reviewed at least once every four years or sooner where there is a significant change to the activities, or in the event of recommendations arising from investigations of accidents, incidents, emergencies or other non-compliances.

Energy Efficiency

Where relevant, operating procedures will include details of techniques to promote efficient operation. Maintenance and housekeeping measures will be developed as part of the preventative maintenance system. This will include details of the measures specifically aimed at maintaining the efficiency of the facility during its operational life.

During the operational life of the facility, energy use will be monitored and recorded. Periodically, usage will be reviewed to identify areas for improvement and ensure that any abnormal increase in energy use is investigated and appropriate action taken to resolve the issue. Any areas where improvements are identified will be incorporated within the energy efficiency plan for the site. This plan will be incorporated within the EMS to ensure that it is regularly reviewed and maintained up to date with future technology developments.

Raw Materials, Water and Waste

The main raw materials for the waste operations will be diesel fuel for plant and machinery. Potable water will also be used for dampening the external surfaces during dry and dusty periods.

Emissions to Air

There are no point source emissions to air.

Emissions to Surface Water

There are no point source emissions to waters.

Emissions to Sewer, Effluent Treatment Plants or Other Transfers off Site

Site surface water flows to a silt trap and oil separator before discharging into the foul sewer in Mearclough Road. The drainage gullies serving the external waste bays flow to a silt trap before discharging via the same point as the surface water.

This discharge is authorised by the sewerage undertaker and is not regulated by the environmental permit.

Emissions to Land

There are no point source emissions to land.

Fugitive Emissions

Fugitive emissions are assessed in the environmental risk assessment in Appendix C. This details the potential emissions and management controls in place. The management systems in place at the facility to ensure that the risk from fugitive emissions is minimised, for example through regular inspection of waste storage areas, volumes of waste and correct management of the facility.

The ERA details the potential emissions and management controls in place. The risk from fugitive emissions is considered to be “low” to “very low”. A dust management plan has been produced for the site and can be found in Appendix I of this application.

Odour

The Environmental Risk Assessment in Appendix C has identified the risk of odour release from the operation as low.

Noise and Vibration

The risk of noise impacts from the updated operations has been assessed within the Noise Impact Assessment.

The results of the noise impact assessment for the Ellete Waste facility indicate that the predicted specific sound levels during daytime operations are only slightly above the representative background sound levels at the nearest noise sensitive receptors (NSRs), suggesting a low impact depending on context.

The assessment demonstrates that the proposed operation of the Ellete Waste facility is unlikely to result in adverse impacts on residential amenity, with no significant adverse effects anticipated.

Contextual factors, including the existing noise environment and characteristics of the proposed operations, have been considered, confirming that the noise from the facility will likely be indistinguishable from ambient noise levels, thus further reducing the likelihood of an adverse noise impact occurring.

Noise emissions from the Ellete Waste facility are not expected to reach levels that would cause reasonable annoyance, ensuring a high level of protection for the environment and surrounding community.

This has concluded that the risk to local receptors is not significant. Noise emissions from the facility would not be of a magnitude sufficient to give reasonable cause for annoyance, and a high general level of protection of the environment as a whole is provided. The overall risk has been assessed as “low impact”. The Noise Impact Assessment has been placed in Appendix E.

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1 INTRODUCTION

- 1.1.1 This document and associated appendices form the application to vary the Environmental Permit (EP) EPR/NP3699ZH.
- 1.1.2 Permit EPR/NP3699ZH was issued on 27th July 1995 and includes for the operation of a household, commercial and industrial waste transfer station (WTS), without treatment, with a capacity of 5,000 tonnes of waste per year. Whilst a permit has remained in place at the Mearclough site, no waste has been received since 2003. The receipt of waste will recommence following the issue of the permit transfer.

1.2 Site Location

- 1.2.1 The site address is:
Former Mearclough House,
Mearclough Road,
Sowerby Bridge,
Halifax,
HX6 3LF
- 1.2.2 The national grid reference for the site location is SE 06941 23641.
- 1.2.3 The site is located within 200 m of Milner Royd nature reserve, Rochdale Canal and Copley Valley Green Corridor local wildlife sites. Within 50 m of the site there is a deciduous green woodland, which is a designated a protected habitat.
- 1.2.4 The River Calder is approximately 40 m to the north of the site boundary.
- 1.2.5 The nearest residential property is located approximately 180 m from the site boundary to the south at Tall Trees Farm, off Fall Lane.
- 1.2.6 Allotments are located approximately 100 m to the north-east of the site.
- 1.2.7 Bolton Brow Primary Academy and Junior/Infant School is located approximately 245 m to the north-west of the site.

1.3 The Applicant

- 1.3.1 The applicant and operator are Ellete Waste Limited (EWL) and is listed on Companies House with registered number 15158895.

1.4 Nature of the Variation

- 1.4.1 This variation seeks to permit the following changes:
- Increase the annual waste throughput to 35,000 tonnes,
 - Increase the amount of waste which can be stored at any one time to 300m³,
 - Remove the waste transfer station operation;
 - Add treatment activities limited to mechanical and manual sorting,
 - Add three new wastes to the permit EWC codes;
 - 19 10 04 fluff-light fraction and dust other than those mentioned in 19 10 03, and
 - 19 10 06 other fractions other than those mentioned in 19 10 05

-
- 19 12 12 other wastes (including mixtures of materials) from mechanical treatment of wastes other than those mentioned in 19 12 11.

- 1.4.2 The existing waste stream comprises primarily waste from construction and demolition sources together with a smaller quantity of municipal waste. The permitted activities will be the storage with treatment of non-hazardous wastes; D15 (storage pending any operations numbered D1 to D14) and R13 (storage of waste pending any of the operation numbered R1-R12).
- 1.4.3 The variation seeks to increase the permitted capacity of waste that can be accepted to 35,000 tonnes per year. No more than 280 tonnes per day will be accepted at the facility. The amount of waste which can be stored at any one time increased to 300m³. However, the nature of the operation is to process and remove waste as quickly as possible. Therefore, it is unlikely that the facility will store 300m³ of waste at any one time. The permit boundary will also not change as a result of the proposed changes.
- 1.4.4 In addition to increasing the waste throughput, this variation will introduce mechanical treatment activities which include sorting by use of a rotary screener (trommel) and a hand picking station.
- 1.4.5 The variation also seeks to include additional waste codes for non-hazardous metal shredder residues, known as fragmentation fluff, or frag fluff and waste from mechanical treatment of wastes. The new waste codes to be included in the permit for these wastes are 19 10 04 and 19 10 06 for non-hazardous fragmentation fluff and 19 12 12 for waste from mechanical treatment of wastes. Residual waste will be bulked up with treated wastes and transferred off site.
- 1.4.6 In addition to the existing external bay for receiving and storing excavation waste and inert waste, there will be skips stored inside the WTF building for receiving recyclable metal and plastic waste and external skips for storing bulked sorted wastes.
- 1.4.7 The treatment activities comprise physical treatment with a mixture of recovery and disposal which is not a listed activity within Schedule 1, Part 2, Chapter 5, Section 5.4 (a) of EPR¹. Therefore, the facility will not become an installation as a result of the variation but will remain as a waste operation, as defined within RGN 2 “Understanding the meaning of regulated facility”⁴.

1.5 Pre-application Discussions

- 1.5.1 Basic pre-application advice has been sought undertaken and a conservation screening report obtained, details of which are included in Appendix G.

1.6 Structure of the Application Document

- 1.6.1 This section provides an overview of the proposals. This is supplemented by further details in Sections 2 – 5 as follows:
- Section 2 details the proposed management practices which will be in place at the WTF:
 - Section 3 addresses the operational measures which will be in place to prevent and/or control any potential environmental effects of the proposal.
 - Section 4 identifies the nature of emissions from the installation.
 - Section 5 summarises the conclusions from the detailed impact assessments undertaken to predict any environmental effects from the installation.
- 1.6.2 Supporting documents, assessments and application forms are provided within the appendices as listed in the contents page.

⁴ [RGN 2 Understanding the meaning of regulated facility](#)

2 MANAGEMENT OF ACTIVITIES

2.1 Environmental Management System

- 2.1.1 Operations at the site have been historically undertaken in accordance with the Working Plan that was approved by the Environment Agency.
- 2.1.2 An environmental management system (EMS) is under development and will be in place prior to the WTF recommencing activities including the changes subject to this variation. The EMS will include those documented systems required by the Environmental Permit to identify and minimise risks of pollution including those from operations, maintenance, accidents, incidents and non-conformances; site closure and risks drawn to the attention of the operator as a result of complaint. It will also document how EWL will ensure the facility is managed using sufficient competent persons and resources and to the requirements of the following Environment Agency guidance document “Non-hazardous and inert waste: appropriate measures for permitted facilities”².
- 2.1.3 The EMS will 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;
 - Performance against the management system is audited at regular intervals; and
 - The environmental permit is complied with.
- 2.1.4 The management system will be reviewed at least once every four years or sooner where there is a significant change to the activities, or in the event of recommendations arising from investigations of accidents, incidents, emergencies or other non-compliances.
- 2.1.5 Further details on specific aspects of the management systems for the facility are provided in the following sections.

2.2 Operations and Maintenance

- 2.2.1 Documented management systems will be put in place to ensure that those operations which have the potential to give rise to significant environmental effects are controlled. These will include operational procedures for normal, abnormal and emergency operations.
- 2.2.2 Planned and preventative maintenance routines will be established to ensure all key plant components which have the potential to affect the environmental performance of the facility remain in good working order. Maintenance routines will draw on manufacturer's recommendations, modified as appropriate by operational experience during the lifetime of the facility. Maintenance will be carried out by contractors in accordance with the operator's maintenance requirements.

2.3 Competence and Training

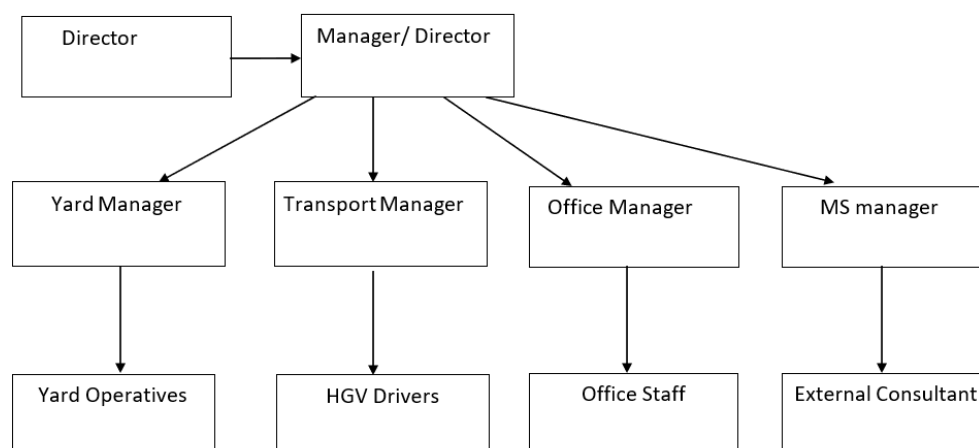
- 2.3.1 The Operator will ensure that all personnel employed at the facility have the appropriate skills and technical capabilities to understand the operation of the process, and their obligations under the terms and conditions of the Permit.
- 2.3.2 The operator will provide operator training to ensure the facility is managed and operated by a fully trained workforce. Training will not only address normal operations but will also include those actions required in the event of abnormal operations and emergencies.
- 2.3.3 A training policy and training plans will be in place for all staff roles at the facility, these include specific training relevant to the environmental permit and operation of the facility to minimise risk to the environment. Training records for all staff are kept demonstrating competency.

- 2.3.4 Training records will be prepared for all operational staff and training needs will be reviewed on a regular basis as part of the Operator's EMS procedures. Copies of all training records will be available for inspection upon request.
- 2.3.5 A technical competent manager (TCM) is employed for the facility and has the following relevant qualifications:
- WAMITAB Level 4 High Risk Operator Competence for Managing Physical and Chemical Treatment of Hazardous Waste Treatment and Transfer (601/8502/8) (HROC6), Continuing Competency Certificate number 5290411 issued on 26 September 2025.
- 2.3.6 Copies of the required certification for the TCM who will oversee the facility are provided in Appendix H.

2.4 Organisation

- 2.4.1 An organogram for the installation is provided in Figure 2-1 below and indicates the main lines of responsibility. Roles and responsibilities will be clearly defined within the management system.

Figure 2-1 – Organisational chart.



2.5 Accident Management

- 2.5.1 An accident management plan (AMP) will be established prior to re-commencing operation of the proposed installation. The AMP will detail those actions required in the event of an emergency or accident/incident. This will include small incidents such as minor spills and leaks and complaints, as well as major incidents such as fire and major spills. In particular, a system for recording and allocating appropriate follow-up for accidents, incidents and non-conformances will be established prior to re-commencing operations.
- 2.5.2 To support this application, an Environmental Risk Assessment (ERA) is provided in Appendix C, which includes an assessment of potential accident risks. This will be used to inform the AMP.
- 2.5.3 The Operator will undertake routine inspections of the installation to identify potential risks with the operations that may result in accidents or incidents at the site. A programme of preventative maintenance of relevant plants and infrastructure will be in place to minimise risk of impacts from downtime or faulty equipment.
- 2.5.4 An assessment of the risks from accidents at the facility has been undertaken and can be found in the environmental risk assessment in Appendix C.

2.6 Fire Prevention Plan

- 2.6.1 A fire prevention plan (FPP) has been produced in connection with the main permit application which includes consideration of the site operations. This is included as Appendix F of the main application.

2.7 Site Security

- 2.7.1 The site is bounded by galvanised steel palisade fencing which is 2.4 m high a matching security gates at 2 m high. On the western boundary, there is a wall which is set to a height of 2 m.

2.8 Site Records

- 2.8.1 The following records will be maintained and kept at the site for inspection as required:

- Waste input and output, including any rejected loads or quarantined materials,
- Servicing and maintenance records,
- Management procedures,
- Inspection records,
- Results of site audits and reviews,
- Complaints and incident records and
- Training records.

- 2.8.2 All records will also be stored off-site electronically for a minimum period of 6 years.

2.9 Non-compliance Reporting

- 2.9.1 EMS procedures will include details of reporting non-compliances to the regulator for the following events:

- Breaches of permit conditions,
- Incidents, accidents, and emergencies,
- Malfunction, breakdown or failure of plant,
- Other operational system failure and
- Complaints.

- 2.9.2 The procedure will ensure that non-compliances are investigated and rectified with lessons learnt fed into the review process so that improvements to site systems and procedures are made following a non-compliance.

2.10 Types of Waste Accepted

- 2.10.1 The waste codes to be accepted at the site are aligned with the original Working Plan for Waste Management Plan Licence No 1516. This working plan was provided by the EA and the lists of wastes have been agreed the EA in previous correspondence. These are detailed in Table 2-1

Table 2-1- EWC codes currently permitted at site

Waste Code	Description
17 01 concrete, bricks, tiles and ceramics	
17 01 01	concrete
17 01 02	bricks

Waste Code	Description
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 01	wood
17 02 02	glass
17 02 03	plastic
17 03 bituminous mixtures, coal tar and tarred products	
17 03 02	bituminous mixtures other than those mentioned in 17 03 01
17 04 metals (including their alloys)	
17 04 01	copper, bronze, brass
17 04 02	aluminium
17 04 03	lead
17 04 04	zinc
17 04 05	iron and steel
17 04 06	tin
17 04 07	mixed metals
17 04 11	cables other than those mentioned in 17 04 10
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 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 06 insulation materials and asbestos containing construction materials	
17 06 04	insulation materials other than those mentioned in 17 06 01 and 17 06 03
17 08 gypsum based construction material	
17 08 02	gypsum based construction materials other than those mentioned in 17 08 01
17 09 other construction and demolition wastes	
17 09 04	mixed construction and demolition wastes other than those mentioned in 17 09 01, 17 09 02 and 17 09 03
20 MUNICIPAL WASTES (HOUSEHOLD WASTE AND SIMILAR COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL WASTES) INCLUDING SEPARATELY COLLECTED FRACTIONS	
20 01 separately collected fractions (except 15 01)	
20 01 01	paper and cardboard
20 01 02	glass
20 01 10	clothes
20 01 11	textiles
20 01 36	discarded electrical and electronic equipment other than those mentioned in 200121,200123 and 200135
20 01 38	wood other than that mentioned in 20 01 37
20 01 39	plastics
20 01 40	metals
20 01 99	other fractions not otherwise specified
20 02 garden and park wastes (including cemetery waste)	
20 02 01	Biodegradable waste
20 02 02	Soil and stones
20 02 03	Other non-biodegradable wastes
20 03 other municipal wastes	
20 03 01	Mixed municipal waste
20 03 02	Waste from markets
20 03 03	Street-cleaning residues
20 03 07	Bulky waste

Waste Code	Description
20 03 99	Municipal wastes not otherwise specified

2.10.2 This variation to the permit is to include additional non-hazardous waste codes listed in Table 2-2 below.

Table 2-2 - Proposed additional waste types

Waste Code	Description of the Waste
19 10	Shredding of metal containing wastes
19 10 04	fluff-light fraction and dust other than those mentioned in 19 10 03
19 10 06	other fractions other than those mentioned in 19 10 05
19 12 12	other wastes (including mixtures of materials) from mechanical treatment of wastes other than those mentioned in 19 12 11

2.11 Efficient Use of Raw Materials and Water

The following section provides information on raw materials and water usage, nature of raw materials and storage arrangements for the installation.

Efficient Use of Raw Materials

2.11.1 Table 2-3 provides details of raw materials, expected usage, storage and potential environmental effects.

Table 2-3 - Main Raw Materials Usage

Raw Material	Expected Usage (annum)	Maximum storage including capacity	Fate	Environmental Effects	Alternatives
Diesel	10,000 lt	2500 litres within double skinned tank, holds 110% of contents	Used for mobile plant and machinery on site	Not readily biodegradable. Persists under anaerobic conditions. Has the potential to bioaccumulate. Harmful, 10 < LC/EC50 < 100 mg/l, to aquatic organisms (estimated). (LC/EC50 expressed as the nominal amount of product required to prepare aqueous test extract). Low acute toxicity to mammals. May cause physical fouling of aquatic organisms	Natural gas - May be restricted by design of plant.
Engine oil	205 litres	135 litres within bunded area which holds 110% of contents of largest container	Used for plant and machinery on site	Mineral oil based. Not biodegradable and no evidence of bioaccumulation. Not soluble in water. Spillages will spread on surface of water and will harm aquatic life and impair oxygen transfer. Spillages will penetrate soil and lead to groundwater contamination.	Synthetic oil – poses similar environmental risks. Usually mixed with mineral oil. May be restricted by design of plant.
Hydraulic oil	205 litres	135 litres within bunded area which holds 110% of contents of largest container	Used for plant and machinery on site	Mineral oil based. Not biodegradable and no evidence of bioaccumulation. Not soluble in water. Spillages will spread on surface of water and will harm aquatic life and impair oxygen transfer. Spillages will penetrate soil and lead to groundwater contamination.	Synthetic oil – poses similar environmental risks. Usually mixed with mineral oil. May be restricted by design of plant.
Grease cartridges	108 kg	25 units within bunded area which holds 110% of contents of largest container	Used for plant and machinery on site	Mineral oil based. Unlikely to penetrate soils and unlikely to spread in water, not soluble. Product contains substances which create sediment in water. Not likely to bioaccumulate and not toxic to aquatic life.	Synthetic oil based grease.

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- 2.11.2 Diesel for the onsite plant will be stored within a 2,500 litre double-skinned tank which is located within a bunded area. 110% of the volume of the tank. The fill points have auto shut-off system. There are no high-level alarms or leak detection.
- 2.11.3 Hydraulic and engine oils are stored within a dedicated bunded store on impermeable surface with sealed drainage etc. The stores contain the following volumes:
- Oils and greases - 2 no. 45 gallon drums stored within a bunded area. Usage is variable
 - 25 no. individual units, each measuring 12 x 2 inch.
- 2.11.4 Spill kits are stored in the WTF building. Staff are aware of spill kit locations and are trained in spillage response.

Water Use

- 2.11.5 The facility will use minimal water. Water will be used to dampen the external concrete areas and inert waste stockpiles to reduce dust emissions. This will be achieved by the use of a water hose or a misting system.
- 2.11.6 The dampening of the external concrete surfaces and inert stockpiles will use minimal water and will only be carried out during certain weather conditions, such as dry and windy conditions. The water will be supplied by potable mains water.
- 2.11.7 In the event of a fire, firewater would be supplied from the mains supply using a hose. There are also fire extinguishers available throughout the site. In the event of a larger scale fire, a hydrant is located approximately 50m from the centre of the site. The hydrant conforms to BS 750 and would deliver a good flow of water.
- 2.11.8 Combustible waste will be stored within the concrete waste bays or within skips. Treatment activities take place inside the building.
- 2.11.9 Disposal of this water will be via tanker to an authorised disposal facility.

2.12 Avoidance, Recovery and Disposal of Wastes

- 2.12.1 The operations at the facility may produce only a minimal amount of waste material. The main wastes produced likely to be produced from the operations are packaging materials from the lubricating oils and greases used on site.
- 2.12.2 Only the required amounts of oil for use in plant and machinery is purchased therefore minimising the generation of waste. These are generally used for topping up only, with servicing and maintenance being undertaken off-site at dedicated servicing and maintenance facilities.
- 2.12.3 Waste treatment activities which will take place at the facility are limited to mechanical screening and manual sorting. Residual waste streams are bulked up and transferred to recycling sites.

3 SITE OPERATIONS

3.1 Overview of facility

- 3.1.1 The primary purpose of treatment at the facility is to separate mixed wastes into separate recoverable fractions, enabling recycling and minimising disposal. Waste is separated to recover metals, wood, plasterboard and inert material.
- 3.1.2 The facility consists of a waste reception building which is fitted with two roller shutter doors, to accept incoming wastes. This building will also be used for the treatment of non-hazardous wastes. There will be a single concrete bay within the building for storing the oversize rejects from the treatment process .
- 3.1.3 An external bay are used for the storage of inert and excavation wastes. Recyclable materials such as paper, card, wood and metals are stored in skips within the external yard area.. The external yard area is constructed of impermeable concrete which drains through two oil separators (east and west sides of the yard). The surface water then enters the foul sewer located in Mearclough Road.
- 3.1.4 A plan showing the site layouts can be found in Appendix B.

3.2 Waste Delivery

- 3.2.1 The WTF can accept waste for 11 hours per day, 364 days per year, although weekend deliveries are typically lower.
- 3.2.2 Waste is delivered typically in one of three sizes maxi with up to 9 tonnes of waste; midi with up to 5 tonnes and mini skips with 3 tonnes. Assuming an average skip load weight of 8 tonnes, the highest daily intake could reach approximately 280 tonnes. Operational controls will control waste delivery movements and restrict the number of simultaneous arrivals to a maximum of 3 skips, which equates to around 24 tonnes arriving at one time. The waste reception building has sufficient floor space to safely accommodate these 3 loads.
- 3.2.3 In terms of vehicle movements, an average day involving 12 skip deliveries and 7 RoRo removals generates approximately 38 vehicle movements, equivalent to an average of circa 4 movements per hour. A peak-hour scenario has also been assessed to demonstrate how the site operates during the busiest periods. At peak times, up to 3 skips may arrive simultaneously, generating 6 movements, alongside up to 2 RoRo removals, generating an additional 4 movements. The worst-case peak-hour traffic therefore equates to 10 movements per hour, or roughly 1 movement every 6 minutes. Even on the busiest day, 35 skip deliveries and 9 RoRo removals, totalling 88 movements, the site can maintain safe circulation without congestion or the need to hold vehicles outside the site boundary. Importantly, the level of traffic is compatible with the requirement to keep roller shutter doors closed except during controlled vehicle loading and unloading.
- 3.2.4 Short-term peaks are effectively managed through a combination of short tip-and-leave times, the high throughput of the mechanical treatment plant, prioritised loading and dispatch of RoRo containers, and flexible hand-picking resource allocation. These operational controls ensure that the site can maintain rapid turnover, avoid any accumulation of waste.
- 3.2.5 Based on the above skip deliveries can be managed safely and will not result in excessive vehicle numbers on site or queuing on the public highway.
- 3.2.6 At this stage the site does not accept 3rd party waste. Predominately all waste is bought to the site by their own skip wagons, allowing scheduled arrival times to be controlled. All the removals are sorted by the transport operator who is based site. All waste removed from site is currently moved by Ellete's own wagons except the metal skip that is covered by a third party.

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- 3.2.7 EWL operates 3 delivery vehicles, hence the maximum number of vehicles arriving at any time is 3. Due to EWL operating all delivery vehicles they are in total control of what enters the site and when it enters the site.
- 3.2.8 The site benefits from having its transport manager based on the same premises, enabling real-time oversight and coordination of all vehicle movements. Drivers are not issued with a full day of pre-planned jobs, instead, each driver is allocated their next job only when they return to the site. This approach allows the transport manager to actively regulate the timing of deliveries, staggering arrivals where necessary to prevent excessive vehicles attending the site at once. This system provides a high level of operational control and responsiveness, ensuring that skip arrivals are matched to available floor capacity, hand-picking resources, and overall site activity levels. As a result, the site can maintain a steady and manageable flow of vehicles throughout the day, preventing any risk of congestion or queuing beyond the site boundary.
- 3.2.9 As a further contingency measure, the operator has the ability to divert incoming skip deliveries and temporarily store waste at the separate, larger Belmont site should operational pressures arise at the Mearclough facility. This provides an additional safeguard to ensure that waste does not accumulate on the floor, that storage limits are rarely approached, and that no queuing or congestion occurs either on site or on the public highway. This contingency is activated only when required and is managed in real time by the transport manager. The availability of the Belmont site ensures that, even during exceptional peak periods or unforeseen operational constraints, the site can maintain full compliance with storage limits, emissions controls, and safe traffic management.

3.3 Waste Acceptance

- 3.3.1 EWL will have in place a waste pre-acceptance and acceptance procedure which meets the requirements of the Environment Agency guidance Non-hazardous and inert waste: appropriate measures for permitted facilities². Waste is pre-accepted by the terms and conditions of the EWL customer contract which sets out unacceptable wastes such as fridges and freezers or hazardous wastes. Drivers will also carry out a visual pre-acceptance check before removal of waste from the producer's premises.
- 3.3.2 The incoming material will be delivered in covered skips and vehicles. On arrival at the site, deliveries will be checked to ensure they conform to the permitted waste codes and the deliveries are as expected from contracted suppliers. Waste shall only be accepted if:
- it is of a type and quantity listed in Table 2-1; and
 - it conforms to the description in the documentation supplied by the producer and holder,
 - in addition to these, the trained site representative will carry out visual, physical, chemical and odour-based checks. A record of the criteria for non-conformance or rejection will be kept,
 - waste will not be accepted at the facility if there is not enough storage capacity.
- 3.3.3 Paperwork records of all deliveries will be checked to ensure that the correct details of the supplier, waste description, volume/tonnage and EWC code are included. Any non-conforming loads will be rejected and returned to the customer if possible. Waste may also be rejected if it does not match the description of the waste included on the paperwork.
- 3.3.4 Following acceptance, waste will be tipped within the general waste bay. During tipping, the waste will again be visually inspected for any non-conforming materials. If any materials are found, these will be removed to the quarantine area immediately for storage prior to removal from the site.
- 3.3.5 Large pieces of wastes such as will be placed by the 360° grab into the dedicated containers which are inside the WTF building.
- 3.3.1 Any waste identified as being contaminated with food waste will be stored in a sealed container and removed from site within 3 days. If a particularly odorous waste is identified, it will be rejected and sent off site.

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- 3.3.2 The waste will be brought into the waste reception building typically by vehicles such as skip vehicle. The vehicle drivers are directed to the reception area by the yardman.. The loading shovel will then tidy and compact the waste as required.

Waste Tracking

- 3.3.3 The site inventory will be able to track and link the specific incoming consignments of waste to specific outgoing waste loads and documentation. This system will be electronic or an equivalent system which holds information about available capacity of different parts of the facility such as reception, quarantine and storage areas. It will include this information as a minimum:

- the date the waste arrived on site
- the original producer's details (or unique identifier)
- a unique reference number
- waste pre-acceptance and acceptance information
- the package type and size
- the intended treatment or disposal route
- the nature and quantity of wastes held on site
- where the waste is physically located on site
- where the waste is in the designated recovery or disposal process
- identifying the staff who have taken any decisions about accepting or rejecting waste streams and who have decided on recovery or disposal options
- details that link waste to relevant transfer notes
- details of any non-conformances and rejections, including consignment notes for waste rejected because it is hazardous.

- 3.3.4 There will be a system which sets out for each LoW code:

- the total quantity of waste present on site at any one time
- a breakdown of the waste quantities you are storing pending onward transfer
- where a batch of waste is located based on a site plan
- the quantity of waste on site compared with the limits in the management system and permit
- the length of time the waste has been on site compared with the limits in the management system and permit,
- total quantity of end-of-waste materials on site at any one time, and where that material is located based on the site plan.

- 3.3.5 Back-up copies of records will be available off site in an emergency.

- 3.3.6 Acceptance records will be kept for a minimum of 2 years after the waste has been removed off site.

Unacceptable Waste

- 3.3.1 Where, upon inspection, the waste does not conform to the description in the documentation supplied by the producer or holder it will be returned to the holder.

- 3.3.2 Should any unacceptable waste be identified after unloading, it would be stored in the designated quarantine area, separated from other waste, until it can be collected and transported for treatment or disposal by an appropriately licensed waste carrier.

3.4 Waste Treatment

- 3.4.1 Waste arrives at the site within skips. The primary purpose of treatment at the facility is to separate mixed wastes into separate recoverable fractions, enabling recycling and minimising disposal. Waste is separated to recover metals, wood, plasterboard and plastics. For mixed skip waste, treatment is required before any material can be stored and ultimately removed from site for onward management.
- 3.4.2 While all waste accepted at the site is treated, this does not mean that every load will pass through the trommel and picking line. Treatment at the site includes manual sorting and mechanical separation of skip loads, and the specific treatment applied will depend on the characteristics of the delivered load of waste.
- 3.4.3 When waste arrives at the site it is tipped within the Waste Treatment building. At this point, the waste undergoes initial treatment through manual sorting and the grab to remove identifiable fractions. Even where a waste appears to be a single waste type, such as metals, there is often a residual fraction within the load. This can include fines, plastics etc. or other waste residues. In such cases, residual material may require further separation, for example via the trommel.
- 3.4.4 Therefore, it is accurate and appropriate to state that all waste accepted at the site is treated, but treatment may consist of:
- Manual pre-sorting only; or
 - Manual sorting followed by mechanical separation using the trommel or picking line:
- 3.4.5 A decision on whether mechanical separation is required will be made on inspection of each delivery

Mechanical Treatment

1. Initial Manual Sorting and Removal of “Contraries”

- 3.4.6 Waste arrives at the site and is tipped within the Waste Treatment building reception area. Following tipping, the waste undergoes initial manual sorting and sorting using a grab. During this stage, operatives remove:
- Larger items identifiable at this early stage (e.g. metals, plastics, timber). These wastes are then stored moved directly to the relevant external RO-RO/Skip.
 - Non-recyclable contraries and reject material. This is stored within the contraries Ro-Ro inside the WTS.
- 3.4.1 All non-recyclable contraries are placed directly into a dedicated Ro-Ro Skip located away from recyclable fractions, ensuring that mixed recyclables are not contaminated and that clean material enters the trommel system. Recyclable fractions are removed at this stage are placed in their respective area. This process ensures early segregation and improved material quality.

2. Removal of Metals

- 3.4.2 After the initial manual sorting/ grab sorting, the remaining mixed waste is loaded into a hopper that feeds a conveyor belt. Before the waste enters the trommel, a magnet removes ferrous metal, which falls into a designated ferrous metal storage bin/bay situated beneath the conveyor.

3. Trommel Screening and Storage of Trommel Fines

- 3.4.3 The waste stored in the reception area will be put into the hopper that feeds the trommel when there is enough to process through the trommel. Waste then enters the trommel, where material is separated based on particle size. Trommel fines fall through the screen and drop directly into designated fines storage area located beneath the trommel. Fines are stored in this area until transported offsite for further management.

4. Picking Line Treatment and storage of Recovered Fractions

3.4.4 Material that does not fall through the trommel continues onto the picking line. Here, operatives manually remove:

- Plastic
- Non-ferrous metals
- Residues

3.4.5 These fractions are dropped into clearly labelled containers/bays located beneath the picking line for post-treatment storage. Contraries removed at this stage are placed into a dedicated residual Ro-Ro.

5. Final Output of the treatment process

3.4.1 The final output from the trommel process (typically the oversize fraction) consists mainly of soil, stones, rubble, and inert materials. This material is directed into a bay for storage prior to off-site recovery. This is the final stage of mechanical treatment.

6. Post-Treatment Storage and removal from Site

3.4.2 Once treated, each waste fraction is stored in a separate, clearly identified location within the waste treatment building, storage skip/Ro-Ro or associated storage bays. Each output is removed from the site separately, using appropriate carriers for each waste stream. Waste types are not bulked together after treatment. This ensures that recyclables maintain quality and that disposal and recovery routes remain fully compliant.

3.5 Waste Storage and Management

3.5.1 The site has a total combined storage capacity of approximately 354 tonnes: this is detailed in Table 3-1 later in this section.

Table 3-1 Waste type max tonnage

Waste Type	Maximum Storage on Site (Tonnes)
<i>Within the waste treatment building</i>	
Incoming waste pile	32
Metals bin	3
Contraries bin	3
Fines pile	25
Trommel reject bay	3
40yrd skip for non-recyclables or plastics (plastics if frag fluff is being processed)	15
<i>Waste stored externally</i>	
Metals skip	15
Wood skip	15
Inert (soil & stones) bay	220
Plasterboard skip	15
Quarantine skip	8

3.5.1 The maximum storage capacity should only be reached under abnormal circumstances. The site operates on a rapid-turnover model whereby waste is processed and removed from the site as quickly as possible thereby maintaining storage amounts well below the maximum capacity. Normal operations ensure that waste remains on site for the minimum practicable duration.

3.5.2 To achieve a throughput of 35,000 tonnes per annum, the site must process an average of 96 tonnes per day, which across an 11-hour operating period equates to just 8.7 tonnes per hour. This is equivalent to approximately 2 skip per hour on average. This average intake is significantly lower than the processing capability of the mechanical plant, ensuring that the site can comfortably manage the throughput without building up waste on the floor. It takes on average 5 minutes for 1 skip load to be manually picked by operatives and the 360 grab prior to being fed into the

treatment plant. The mechanical plant, which operates at 40–50 tonnes per hour, provides significant spare capacity and rapidly draws down material once it has been picked this combined with the 5 minute hand picking time does not result in backlogs or prolonged floor storage. The reception area is designed to hold approximately four skip loads at once, and material once picked is fed into the trommel and treatment line to maximise the available area of floor storage.

- 3.5.3 Outbound waste is removed using 40-yard RoRo containers, each capable of carrying up to 15 tonnes or 8 tonnes for quarantine waste. On an average day of 96 tonnes, the site would require approximately 7 containers to be removed. On a peak day handling around 135 tonnes, up to 9 containers may be required.
- 3.5.4 All waste types will be stored on site for a maximum of seven working days.
- 3.5.5 The trommel fines from treated waste will be stored loose under the trommel
- 3.5.6 the building is fitted with roller shutter doors to reduce the risk of dust emissions and litter escaping.
- 3.5.7 There is also a separate waste bays located within the external yard area which will be used to store inert waste and excavation waste. Furthermore, metals, plasterboard and wood is stored in external skips.

3.6 Site Drainage

Surface Water Drainage

- 3.6.1 Clean rainwater run-off from impermeable areas including roads, parking areas and roofs will be discharged to the foul sewer in Mearclough Road via a silt trap.
- 3.6.2 A site drainage plan is provided in Appendix B which displays the surface water route.

Trade Effluent and Foul Drainage

- 3.6.3 The disposal of domestic foul sewage waste generated from the welfare facilities will be directed to the foul drain. This variation will not change the current drainage arrangements.
- 3.6.4 The single external inert waste storage bays are served by drainage channels which are directed to the foul sewer. Prior to leaving the facility boundary, the liquid will enter a silt trap and then the oil separator as set out in the drainage plan in Appendix B. There are no process effluents from the waste treatment activity.
- 3.6.5 A site drainage plan is provided in Appendix B which displays the foul drainage route.

4 EMISSIONS AND MONITORING

4.1 Point Source Emissions to Air

4.1.1 There are no point source emissions to air.

4.2 Point Source Emissions to Surface Water (Other than Sewers)

4.2.1 There are no point source emissions to surface water.

4.3 Point Source Emissions to Sewers, Effluent Treatment Plants or Other Transfers off Site

4.1 The permitted facility includes one point source emission to sewer. The site surface water drains flow through a silt trap and the oil separator before being discharged into the foul sewer in Mearclough Road. This emission is permitted by the sewer undertaker and will not be covered by this permit application.

4.2 The location of this emission point is illustrated on the emissions plan included in Appendix B.

4.4 Point Source Emissions to Land

4.4.1 There are no point source emissions to land.

4.4.2 Underground structures are limited to:

- Drainage gullies and silt traps.
- Oil separator on the western side of the facility taking surface water run-off.

4.5 Monitoring of Emissions to Water/Sewer

4.5.1 There will be no process discharges to water.

4.5.2 Only surface water run-off will discharge to the foul sewer located in Mearclough Road, after passing through an oil interceptor.

5 ENVIRONMENTAL IMPACTS

- 5.1.1 To support this application a number of environmental assessments have been performed. The full details of these assessments are appended to this application and a reference to the full assessment is given where relevant for the environmental issues detailed below.

5.2 Fugitive Emissions

- 5.2.1 Fugitive emissions are assessed in the environmental risk assessment in Appendix C, these include:
- dust from the transfer and storage of waste;
 - litter from waste handling;
 - pests and vermin attracted to wastes;
 - fumes from fuel storage for onsite plant; and
 - run-off from waste storage.
- 5.2.2 This details the potential emissions and management controls in place. The management systems in place at the facility to ensure that the risk from fugitive emissions is minimised, for example through regular inspection of waste storage areas, volumes of waste and correct management of the facility.
- 5.2.3 The environmental risk assessment details the potential emissions and management controls in place. The risk from fugitive emissions is considered to be “low” to “very low”.

Dust Emissions

- 5.2.4 The EA guidance on controlling and monitoring emissions for permitted facilities⁵ sets out the need to have a Dust Management Plan as the facility is a household, commercial and industrial waste transfer station and located close to a sensitive receptor (residential property).
- 5.2.5 A Dust Management Plan has been prepared to demonstrate how the facility will management dust to prevent, where that is not possible, reduce the pollution from these emissions. The Dust Management Plan has been placed in Appendix I.
- 5.2.6 The waste treatment building has roller shutter doors installed which will remain closed other than for access. Typical roller shutter doors require approximately 20 seconds to open and a further 20 seconds to close, plus time for the vehicle to enter/exit the building. This will mean the doors should only be open for circa 1 minute for each delivery and based on the reduced quantities of material accepted an average of 1-2 deliveries per hour would be expected. The site operates an approximate of 1 removal per 2 deliveries of waste at the site. Therefore, we can determine that 1 removal will be made per hour. Therefore, the roller shutter doors will be open for a period of 3 minutes each hour on average. Given the limited time that the doors will need to remain open, the roller shutter doors will provide effective dust containment.
- 5.2.7 Due to the quantity of waste accepted at the site used waste quantities proposed as part of the variation, the use of a manual hose for dust suppression remains a proportionate control measure. The compact nature of the site allows the manual hose to be deployed proactively, by dampening wastes during dry weather, and reactively, should any dust be observed during handling activities. This ensures that dust is effectively managed at source.

⁵ <https://www.gov.uk/guidance/control-and-monitor-emissions-for-your-environmental-permit#odour>

Odour

- 5.2.8 Odour emissions are assessed in the environmental risk assessment in Appendix C. Whilst odorous wastes are unlikely to be received at the facility, the management systems in place at the facility to ensure that the risk from odour emissions is minimised, for example through regular inspection of incoming wastes, waste storage areas, assessing waste storage times and correct management of the facility.
- 5.2.9 The environmental risk assessment details the potential emissions and management controls in place. The risk from odour nuisance is considered to be “low”.

Noise and Vibration

- 5.2.10 Noise and vibration effects from the facility are considered within the ERA, included in Appendix C. The ERA has followed the format of EA guidance and concluded that no significant noise risks are expected from the updated activities.
- 5.2.11 An assessment of the expected impact of noise from operation of the updated activities is provided in Appendix E. This Appendix identifies the main noise sources and nearest noise sensitive receptors (NSRs), characterises the noise sources, assesses its potential impact. Details of noise monitoring for the purpose of establishing the baseline levels are also provided.
- 5.2.12 The results of the assessment indicate that significant adverse noise or vibration effects would not be expected as a result of the updated activities.

6 SUMMARY

- 6.1.1 This application is seeking to vary the environmental permit for the CVSH Waste Treatment Facility (WTF) at Mearclough Road, to increase the throughput of waste from 5,000 tonnes of waste per year to 35,000 tonnes per year.
- 6.1.2 The amount of waste which can be stored at the facility at any one time will increase to 300m³.
- 6.1.3 No more than 280 tonnes of waste will be accepted into the facility in a day, as per the current permit limit.
- 6.1.4 The variation also seeks to amend the permit to include the following changes:
- Add treatment activities limited to sorting by mechanical and manual sorting techniques,
 - Add three new wastes to the permit EWC codes;
 - 19 10 04 fluff-light fraction and dust other than those mentioned in 19 10 03,
 - 19 10 06 other fractions other than those mentioned in 19 10 05,
 - 19 12 12 other wastes (including mixtures of materials) from mechanical treatment of wastes other than those mentioned in 19 12 11.
- 6.1.5 The existing permitted boundary will not change as a result of the proposed changes.

Appendices

Appendix A

Application Forms

Appendix B

Site Plans

Appendix C

Environmental Risk Assessment

Appendix D

Site Condition Report

Appendix E

Noise Impact Assessment

Appendix F

Fire Prevention Plan

Appendix G

Habitats Conservation Screening

Appendix H

Technical Competency

Appendix I

Dust Management Plan

Appendix J

Existing Site Permit

Appendix K

Appropriate Measures Assessment

