

**APPLICATION TO VARY WASTE PERMIT  
EPR/SP3196ZQ**  
Supporting Information

For Calder Valley Skip Hire Ltd

794-ENV-EPC-20766

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21 August 2024

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## Approval for issue

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Jennifer Stringer

Technical Director

21 August 2024

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### Prepared for:

**CVSH Ltd**

Joe Sawrij

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## NON-TECHNICAL SUMMARY

Calder Valley Skip Hire Ltd is applying to vary permit EPR/SP3196ZQ. The current permit authorises the operation of a household, commercial and industrial waste transfer station (WTS), including treatment, with a capacity of 145,000 tonnes of waste per year.

The WTS is located at Belmont Industrial Estate, Rochdale Road, Sowerby Bridge, Halifax, HX6 3LL.

The current permit allows metal shredder residues, known as fragmentation fluff, or frag fluff to be accepted under non-hazardous EWC codes 19 10 04 and/or 19 10 16. Under the non-hazardous waste codes, this waste was sorted, with magnets removing the ferrous metals and manual sorting of plastic and non-ferrous metals. This practice has ceased.

As a result of reclassification of this waste stream as hazardous, under waste codes 19 10 03\* and 19 10 05\*, this variation seeks to include the two new hazardous waste codes in the list of permitted wastes to allow this activity to continue under the existing environmental permit.

The combined quantity of the hazardous waste that may be stored will be less than 50 tonnes at any one time and the overall permitted annual throughput of waste at the WTS will remain at 145,000 tonnes. Separate storage of the hazardous waste is provided within the WTS building to ensure hazardous and non-hazardous wastes are not combined.

The hazardous waste will be sorted, with magnets removing the ferrous metals and manual sorting of plastic and non-ferrous metals. The sorted metals and plastics will be subjected to the WM3 test to determine whether they remain hazardous. If the test demonstrates that the sorted fractions are non-hazardous, they will be combined with other metal and plastic wastes.

Sorted fractions and residual fragmentation fluff awaiting the result of WM3 testing will be stored externally in a covered area at the western end of the WTS building in metal containers. In the event that the WM3 test determines that any fraction remains hazardous it will remain segregated in the metal container for bulking pending onward transport for appropriate processing or disposal.

Residual fluff that is deemed non-hazardous will be mixed with general waste.

It is proposed to repeat the WM3 testing every 1000 tonnes of waste accepted.

The environmental risks associated with the proposed changes have been assessed. There are no process emissions to land, air, water or sewer from the WTS and this will remain unchanged. The revision of the environmental risk assessment (ERA) is presented in Appendix B. This concludes that acceptance of fragmentation fluff as hazardous waste does not change the risk of odour, noise and vibration, fugitive emissions, and accidents at the WTS.

The fire prevention plan (FPP) for the site has been revised as part of this variation application to include the hazardous waste codes. The revised FPP is presented in Appendix C. The FPP sets out the measures that are in place at the site to 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 proposed change does not increase the risk of a fire starting or spreading on site.

The EMS will be reviewed to ensure it remains appropriate accounting for the additional waste codes.

As a result of this variation, changes to the permit are required as follows:

- Revised site plan in Schedule 7 of the modern permit format as shown on Drawing 2 to show the location of the fragmentation fluff storage area.
- Addition of EWC waste codes 19 10 03\* and 19 10 05\* to the list of wastes permitted in Table S2.1.

There are no other proposed changes to the site activities or management procedures.

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Appendix C	Fire Prevention Plan
Appendix D	TCM Certification

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# 1 INTRODUCTION

- 1.1.1 This document and its supporting appendices form the application to vary permit EPR/SP3196ZQ (previously EAWML 65545) for Calder Valley waste transfer station (WTS).
- 1.1.2 The current permit is for a household, commercial and industrial waste transfer station (WTS), including treatment, with a capacity of 145,000 tonnes of waste per year. The existing waste stream comprises primarily waste from construction and demolition sources together with a smaller quantity of park waste and other similar municipal waste.
- 1.1.3 The permitted activities are: D15 (storage), R13 (storage of waste), D14 (repackaging of waste), D9 (physico-chemical treatment), R2 (recycling or reclamation of organic substances not used as solvents), R3 (recycling or reclamation of metals and metal compounds) and R4 (recycling or reclamation of other inorganic materials).
- 1.1.4 The WTS is located off Rochdale Road, Sowerby Bridge, West Yorkshire, HX6 3LL.
- 1.1.5 The applicant is Calder Valley Skip Hire Limited (CVSH).

## 1.2 Nature of the Variation

- 1.2.1 The current permit allows metal shredder residues, known as fragmentation fluff, or frag fluff to be accepted. This waste has previously been classified as non-hazardous, under EWC codes 19 10 04 or 19 10 06 but has recently been reclassified as hazardous.
- 1.2.2 Regulatory Position Statement 274 (RPS 274): Storing and physically treating hazardous metal shredder residues requires that operators who are permitted to store and/or treat metal shredder residues with waste codes 19/10 04 or 19 10 06 are required to apply to vary their permit to include hazardous metal shredder residues 19 10 03\* and/or 19 10 05\*.
- 1.2.3 An application to vary the permit according to RPS 274 was made within the deadline for submissions. However, the application was returned, and this application is a resubmission.
- 1.2.4 At present a Local Enforcement Position has not been agreed with the Environment Agency area office. Therefore, the operator has ceased to receive further deliveries of fragmentation waste until a varied permit has been issued.
- 1.2.5 This variation application, therefore, seeks to include the following EWC waste codes in the list of permitted wastes:
- Waste code 19 10 03\* - fluff-light fraction and dust containing hazardous substances,
  - Waste code 19 10 05\* - other fractions containing hazardous substances.
- 1.2.6 There will be no other change to the permitted activities taking place on the site, no increase in the amount of waste accepted at the site and no other changes to the types of waste to be accepted.

## 1.3 Structure of this Document

- 1.3.1 Further detail on the proposed variation is set out in the following sections:
- Section 2 Provides supporting information on the proposed changes.
  - Section 3 Describes management of the hazardous metal shredder residues.
  - Section 3 Considers the effect on environmental risk and impacts.
  - Section 4 Identifies changes to the permit conditions.

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## 2 DESCRIPTION OF THE CHANGES

2.1.1 The proposed changes included within this variation are described in this section. All other aspects of the permitted scheme, its management and monitoring will remain as permitted unless identified below.

### 2.2 Additional Waste Codes

- 2.2.1 Metal shredder residues have previously been stored on site for sorting, bulking and onward transport for off-site treatment. The waste was designated non-hazardous under waste codes 19 10 04 and 19 10 06.
- 2.2.2 Following the reclassification of metal shredder residues as hazardous under EWC codes 19 10 03\* and 19 10 05\*, this application seeks to vary the permit to allow the continued acceptance and storage of these wastes. It is anticipated that all fragmentiser fluff will be received under the hazardous waste code. The ability to accept non-hazardous fragmentiser fluff is to be retained within the permit. In the event fragmentiser fluff is to be accepted under the non-hazardous waste codes, evidence to support the non-hazardous classification will need to be provided by the supplier.
- 2.2.3 The hazardous wastes will be delivered and stored within the WTS building. The waste stream will then be sorted by hand and by mechanical means to separate plastic and metal from the delivered waste. The sorted waste fractions will first be subject to the waste classification process set out in [Technical Guidance WM3: Waste Classification - Guidance on the classification and assessment of waste](#)<sup>1</sup> to demonstrate that it is non-hazardous.
- 2.2.4 Subject to the application of the WM3 test outlined in 2.2.3, metal removed from the fragmentation fluff will be transferred to the external metals container and plastics will be transferred to the external plastics container.
- 2.2.5 If the fractions remain hazardous, they will be stored separately from other, non-hazardous waste pending onward transport for appropriate processing or disposal.
- 2.2.6 Residual fragmentation fluff will also be subjected to the WM3 test. Should the WM3 test demonstrate that the residual fluff is non-hazardous, it may be mixed with general waste if appropriate.

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<sup>1</sup> [Waste classification technical guidance - GOV.UK \(www.gov.uk\)](#)

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## 3 MANAGEMENT SYSTEMS

### 3.1 Environmental Management System

- 3.1.1 The activities at the CVSH WTS are carried out under an existing Environmental Management System (EMS). The EMS will be reviewed and updated to include aspects associated with the hazardous waste codes. The great majority of the existing systems and procedures will remain unchanged.
- 3.1.2 The Environmental Risk Assessment (ERA) for the site and activities has been updated to assess risks from the hazardous waste. The revised ERA is included as Appendix B to this application.
- 3.1.3 The revised ERA concludes that the addition of the hazardous waste codes will not change the risk of odour, noise and vibration, fugitive emissions, and accidents at the WTS. The overall risk remains very low to low.
- 3.1.4 The Fire Prevention Plan (FPP) has, likewise, been amended to support this application. The revised FPP is provided in Appendix C.

### 3.2 Technical Competence

- 3.2.1 A Technically Competent Manager (TCM) has been appointed for the works to be undertaken under the permit, as follows:

**Table 3-1: TCM Details**

<b>Name</b>	Mr. Joe Sawrij
<b>Qualifications Held</b>	WAMITAB Level 4 High Risk Operator Competence for Managing Physical and Chemical Treatment of Hazardous Waste Treatment and Transfer (601/8502/8) (HROC6)
<b>Certificate Number</b>	5235066
<b>Date Issued</b>	21/09/2023

- 3.2.2 To operate a site storing hazardous metal wastes, the Technically Competent Manager (TCM) is required to hold the CIWM Level 4 Medium Risk Operator Competence for Physical Treatment (MROC2)<sup>2</sup>. Copies of the required certification are provided in Appendix D to the application.

### 3.3 Management of the Metal Shredder Residues

- 3.3.1 The hazardous waste will be stored securely and separate from non-hazardous wastes, in a designated location within the WTS building, as shown on the site plan provided in Drawing 2.
- 3.3.2 The hazardous metal shredder residues will be handled and stored in accordance with the current permit requirements for waste codes 19 10 04 and 19 10 06.
- 3.3.3 The metal shredder residues will be hand-picked to separate plastics and metal and a magnet picks out further metal from the waste. A WM3 test will be applied to the metal and plastic fractions of the waste and the residual waste to determine which, if any may be deemed non-hazardous.
- 3.3.4 The metal fraction will be transferred to an external metals skip if the application of the WM3 test demonstrates that the metal fraction is non-hazardous.

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<sup>2</sup> [https://wamitab.org.uk/wp-content/uploads/2017/11/PS\\_V6\\_MROC2.pdf](https://wamitab.org.uk/wp-content/uploads/2017/11/PS_V6_MROC2.pdf)

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- 3.3.5 The plastic fraction will be removed to the external plastics skip if the WM3 test demonstrates that it is non-hazardous.
  - 3.3.6 Any sorted fraction fragmentation fluff and residual fluff awaiting the results of a WM3 test will be stored in separate metal containers which are to be located outside the WTS building, at the western end of the building in an area that is to be covered.
  - 3.3.7 Any sorted fraction of the fragmentation fluff that is deemed hazardous following the application of the WM3 test will be retained within the metal containers described in 3.3.6 and bulked for onward transport for appropriate processing or disposal.
  - 3.3.8 If the residual fragmentation fluff is deemed non-hazardous it may be combined with general non-hazardous waste.
  - 3.3.9 It is proposed that the WM3 test will be repeated every 1000 tonnes of fragmentation fluff received.

## **3.4 Record Keeping**

- 3.4.1 Metal shredder residues received at the site will be coded as 19 10 03\* or 19 10 05\*. Records of all waste consignment notes received for wastes falling under these codes will be stored onsite.
- 3.4.2 Records of the application of the WM3 test to the sorted fragmentation fluff fractions will be retained. Similarly records of all onward transfer of the sorted fractions whether hazardous or non-hazardous will also be stored.
- 3.4.3 Records will be kept for at least six years to demonstrate compliance with Regulatory Position Statement 274 (RPS 274) and to comply with the requirements of the environmental permit.



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## 4 ENVIRONMENTAL RISKS AND EFFECTS

4.1.1 This section considers potential environmental effects associated with the changes described in Section 2. See also the revised Environmental Risk Assessment in Appendix C to this application.

### 4.2 Point Source Emissions to Air

4.2.1 Receipt, management and sorting of the revised waste codes do not give rise to new point source emissions to air from the waste transfer station.

4.2.2 Existing point source emissions will be not be affected by the proposed changes.

### 4.3 Point Source Emissions to Water and Sewer

4.3.1 Under normal operation, the permitted scheme does not give rise to process effluent emissions to water or sewer. Any run-off from the waste operations at this facility will enter the existing site drainage system which flows to a surface water sewer. A penstock valve is fitted to enable release of surface water in the event of an incident on site to be prevented. This will remain the case for the revised waste codes.

### 4.4 Point Source Emissions to Land

4.4.1 There is no point source emission to land from the facility. This will remain unchanged for the revised waste codes.

### 4.5 Fugitive Emissions to Air, Water and Sewer

4.5.1 An assessment of the environmental risks associated with fugitive releases and details of proposed management measures for the hazardous metal shredder residues is provided in the ERA in Appendix B.

4.5.2 Fugitive emissions that could be released as a result of the storage of the hazardous metal shredder residues include:

- dust from storage of the waste,
- dust from deposition and collection of the waste,
- run-off from storage of the waste.

4.5.3 The designated storage area for the hazardous metal shredder residues within the WTS building, is secure and designed to minimise handling of the material. The external area designated for storage of sorted fractions awaiting the outcome of WM3 testing will be covered and the waste fractions will be stored within metal containers.

4.5.4 There will be no overall change to the existing management procedures in place to manage fugitive emissions from the WTS activities. These measures are considered appropriate for the proposed additional waste codes and include:

- storage and handling of the waste within the WTS building,
- minimising drop heights.

### 4.6 Noise

4.6.1 There is no additional noise risk from the additional EWC waste codes. The total tonnage of waste to be accepted at the site will remain unchanged. Therefore, no additional vehicle movements are

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anticipated. Loading and unloading will take place within the WTS building and the potential for noise associated with this activity will be similar to that from wastes already accepted at the site.

## **4.7 Odour**

- 4.7.1 The proposed additional waste codes will have a low odour potential.
- 4.7.2 The ERA, Appendix B, sets out the management procedures by which CVSH will control odour impacts during operation (normal and abnormal) of the WTS.
- 4.7.3 The delivery, storage and collection of hazardous metal shredder residues will have no effect on the odour risk or management of odour from the WTS activities.

## **4.8 Energy**

- 4.8.1 There will be no change to the energy that the activities use as a result of this permit variation.

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## 5 CHANGES TO PERMIT CONDITIONS

5.1.1 As a result of this variation, changes to the permit are required as follows:

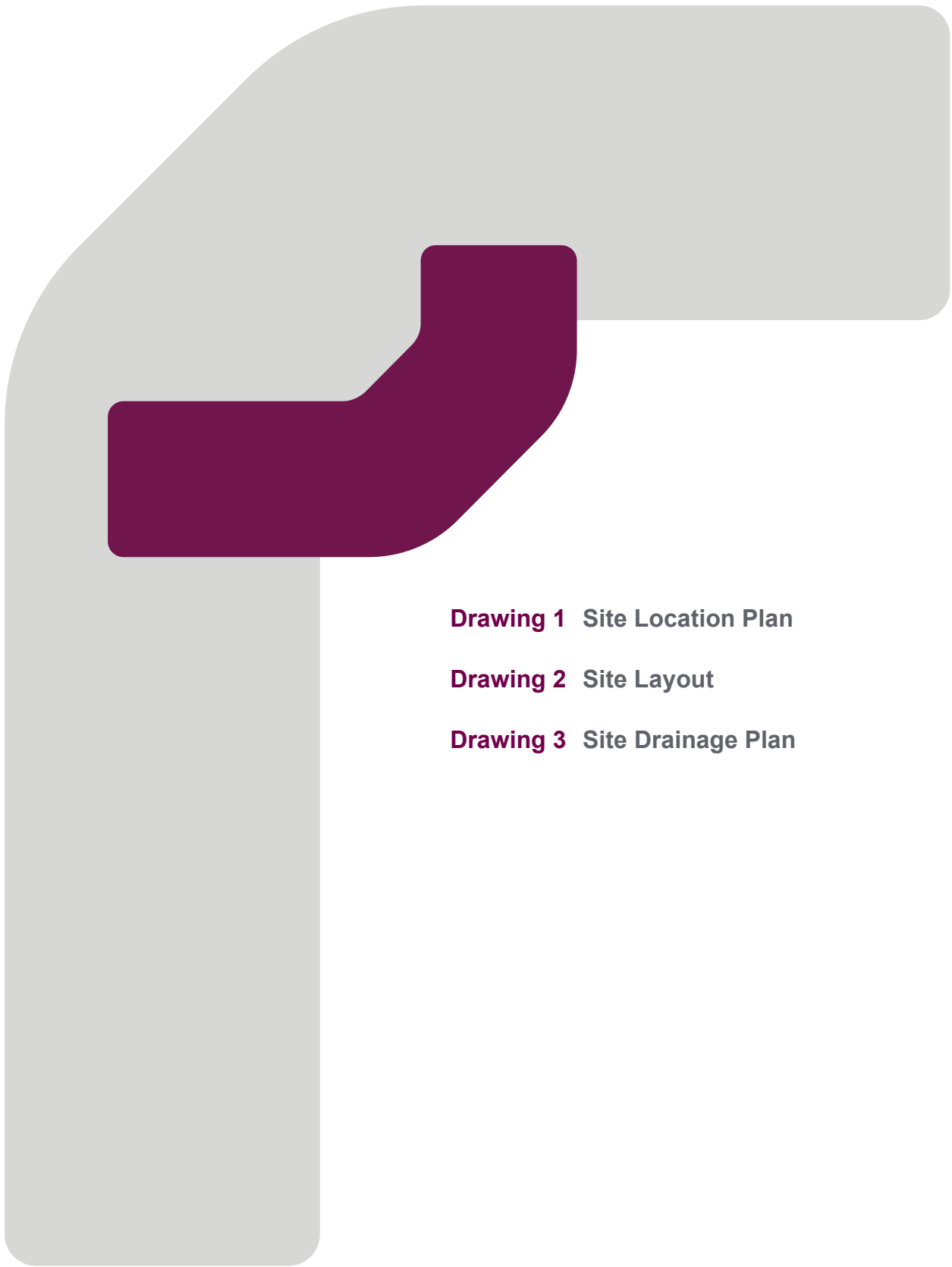
- Revised site plan in Schedule 7 of the modern permit format as shown on Drawing 2.
- Addition of EWC waste codes 19 10 03\* and 19 10 05\* to the list of wastes permitted in Table S2.1

5.1.2 No other change to the permit conditions or total annual throughput of 145,000 tpa is required as a result of this variation.

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## 6 REFERENCES

1. [Waste classification technical guidance - GOV.UK \(www.gov.uk\)](http://www.gov.uk)
2. TCM requirements: [https://wamitab.org.uk/wp-content/uploads/2017/11/PS\\_V6\\_MROC2.pdf](https://wamitab.org.uk/wp-content/uploads/2017/11/PS_V6_MROC2.pdf)



**Drawing 1** Site Location Plan

**Drawing 2** Site Layout

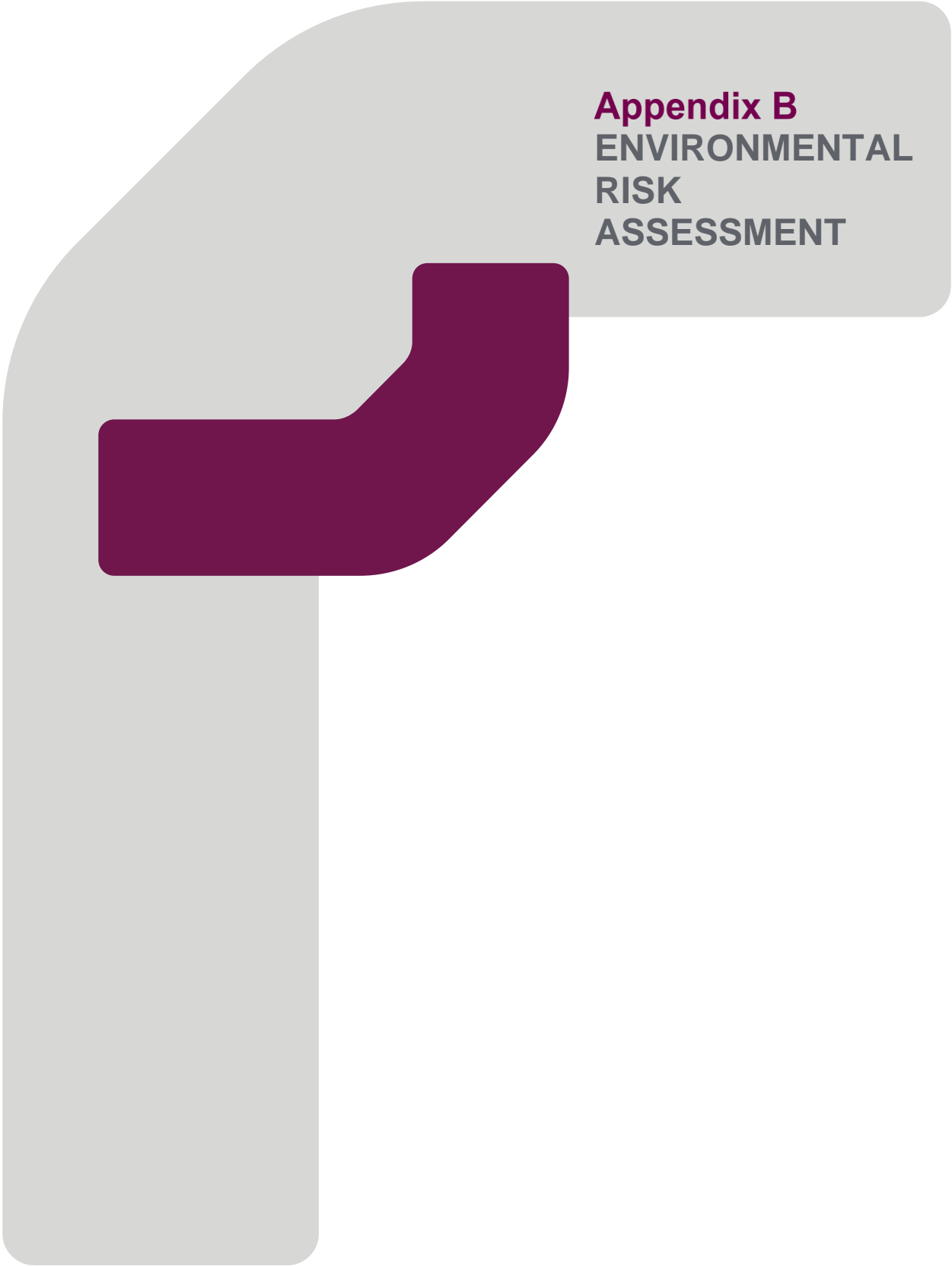
**Drawing 3** Site Drainage Plan

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**Appendix A**  
**APPLICATION**  
**FORMS**

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**Appendix B**  
**ENVIRONMENTAL**  
**RISK**  
**ASSESSMENT**

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**Appendix C**  
**FIRE PREVENTION**  
**PLAN**



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**Appendix D**  
**TCM**  
**CERTIFICATION**

# APPLICATION TO VARY WASTE PERMIT EPR/SP3196ZQ

Supporting Information  
For Calder Valley Skip Hire Ltd  
2024-08-21

794-ENV-EPC-20766

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