



**AN APPLICATION TO VARY ENVIRONMENTAL
PERMIT NUMBER EPR/GB3003GR FOR THE INERT
AND EXCAVATION WASTE TRANSFER STATION
OPERATED BY DB CARGO (UK) LIMITED AT BARKING
EUROHUB, BOX LANE, RENWICK ROAD, BARKING TO
PROVIDE FOR CHANGES TO THE WASTE TYPES
ACCEPTED AT THE SITE**

Report reference: DBC/EU/AW/5671/01
January 2022

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1. Introduction

- 1.1** MJCA is commissioned by DB Cargo (UK) Limited (DB Cargo) to prepare an application to vary Environmental Permit number EPR/GB3003GR (the permit) for the inert and excavation waste transfer station operated by DB Cargo at Barking Eurohub, Box Lane, Renwick Road, Barking (the site). The permit currently comprises a bespoke permit for the operation of an inert and excavation waste transfer station permitted to accept up to 750,000 tonnes of waste per annum (tpa). The most recent variation of the permit (V003 to increase the annual tonnage limit from 250,000 tpa to 750,000 tpa) was issued on 16 February 2021. The site is centred approximately at National Grid Reference (NGR) TQ 47550 83230 and the permit boundary is shown marked in green on Figure 1.
- 1.2** In summary the proposed changes the subject of this variation application comprise the addition of waste codes to the permit. There are no proposals to change the permitted waste operations or to increase the permitted area or the quantity of waste which can be accepted at the site per annum. Details of the proposed changes are presented in Section 2 of this report.

2. Proposed changes

2.1 The proposed changes to the permit which are the subject of this variation application comprise:

A. To add to Table S2.1 of the permit List of Waste (LoW) codes 19 12 12 and 19 13 02. It is proposed that these waste types will be stored in the northern half of the permitted area adjacent to, but segregated from, soil and stones waste categorised under LoW code 17 05 04 currently authorised to be accepted at the site. The area in which it is proposed that LoW codes 19 12 12 and 19 13 02 will be stored is marked on Figure 1. LoW codes 19 12 12 and 19 13 02 will be stored on an impermeable surface with sealed drainage. Further details of these waste types are presented in paragraphs 2.7 and 2.8.

B. To add a range of metal wastes specified under LoW Chapters 02, 12, 16, 17, 19 and 20 to Table S2.1 of the permit. The metal waste types to be added to the permit are all specified in Standard Rules Permit SR2009No7: storage of furnace ready scrap metal for recovery. Loose tipped metal wastes will be stored exclusively in the area in the south of the permitted area marked on Figure 1. This area of the site currently operates a similar activity under a T9 waste exemption for the storage and recovery of scrap metal. Once the varied permit has been issued it is proposed that the T9 exemption will be deregistered. The storage and transfer operations will then be subject to the permit rather than the T9 exemption.

2.2 Table 1 presents the LoW codes that it is proposed will be included in the varied permit. Figure 1 shows the permitted area marked in green. The area of the site in which it is proposed loose tipped metal wastes will be stored is marked with red hatching.

2.3 There are no proposals to increase the overall annual tonnage limit at the site or to include waste activities at the site additional to those already consented. There are no proposals to undertake the mechanical treatment of waste at the site. The activities it is proposed are undertaken at the site remain consistent with those specified in Table S1.1 of the permit. There are no proposals to increase the permit boundary.

- 2.4** Consistent with the current waste operation, waste will continue to be received at the site by road and will be transferred from the site by rail. A new site entrance has been created in the south eastern corner of the western part of the currently permitted area specifically for road access to the designated metal waste area as shown on Figure 1. The new site entrance for metal waste is marked on Figure 1 and will use the existing road network running from Box Lane along the southern boundary of the currently permitted area. The existing site entrance also accessed via Box Lane to the north west of the currently permitted area and the entrance to Harry Sidings will remain unaffected as marked on Figure 1.
- 2.5** The application has been prepared with reference to the relevant aspects of the advice provided by the Environment Agency during previous applications to vary the permit and with reference to relevant guidance provided by the Environment Agency on the gov.uk website. Parts A, C2, C4 and F1 of the Environment Agency Environmental Permit Application Forms are presented at Appendix A. A non-technical summary of the application is presented at Appendix B.
- 2.6** The application is supported by a qualitative Environmental Risk Assessment (ERA) for accidents, odour, noise and fugitive emissions which is presented at Appendix C. The ERA assesses the potential impacts to the surrounding environment from the additional waste types that will be accepted and stored at the site.
- 2.7** Wastes accepted under LoW code 19 12 12 will comprise only inert and non-combustible wastes derived from the processing of construction and demolition wastes via segregated waste processing lines at sites that employ active waste segregation practices. DBC will implement thorough waste acceptance procedures and pre-acceptance procedures including audits of the waste processing facilities generating the waste and regular analyses of waste to be accepted under LoW code 19 12 12. As the source of the 19 12 12 waste will comprise construction and demolition wastes and not commercial and industrial wastes or trommel fines derived from municipal solid waste, the waste accepted under LoW code 19 12 12 will be similar in nature to and will present no greater risk to the environment than the construction and demolition wastes currently authorised to be accepted at the site. It is considered that the waste accepted under LoW 19 12 12 will have a low potential to generate odour and the waste acceptance procedures implemented at the site will include visual and olfactory inspections of wastes received at the site and malodorous

wastes or wastes with the potential to be malodorous will not be accepted at the site. Waste accepted at the site under LoW code 19 12 12 will be stored on an impermeable surface with sealed drainage and storage times will be minimised.

- 2.8** Wastes accepted under LoW code 19 13 02 will comprise soils from remediation projects and will be similar in nature to the waste currently authorised to be accepted at the site under LoW code 17 05 04 soil and stones. DBC will implement thorough waste acceptance procedures and pre-acceptance procedures including the review of site investigation documentation and soil remediation proposals and where relevant analyses of the waste to be accepted under LoW code 19 13 02 will be undertaken. Based on the nature of the waste and the control measures in place it is considered that the waste accepted under LoW code 19 13 02 will present no greater risk to the environment than the construction and demolition wastes currently authorised to be accepted at the site. Waste accepted at the site under LoW code 19 13 02 will be stored on an impermeable surface with sealed drainage.
- 2.9** Table S1.2 of the permit specifies Dust and Particulate Matter Emission Management Plan (DEMP) Version 1.1 dated January 2021 as an operating technique. An updated version of the DEMP (Version 1.2) has been prepared to address the potential for the additional waste types to generate and release dust and provides details of the operational controls employed at the site to mitigate the risk of impacts to the surrounding environment. DEMP Version 1.2 is presented at Appendix D.
- 2.10** The metal waste types to be added to the permit are all specified in Standard Rules Permit SR2009No7: storage of furnace ready scrap metal for recovery. There are no proposals for processing or treatment of metal wastes at the site. Standard Rules Permit SR2009No7 authorises up to 1,000,000 tonnes of waste to be accepted at a site per year hence well in excess of the quantity of metal waste that will be accepted under the bespoke permit for this site. SR2009No7 does not include a condition necessitating a Fire Prevention Plan (FPP) and the application process for SR2009No7 does not require a FPP to be prepared. During the previous application to vary the permit to increase the annual tonnage limit from 250,000 tpa to 750,000 tpa (V003 issued on 16 February 2021) pre-application advice was sought from the Environment Agency in respect of proposals to accept metal wastes at the site and whether a FPP would be required. Although the proposals to include metal wastes in V003 of the permit were not included in the application at that time, the pre-application

advice received remains valid in the context of the proposals the subject of this variation application. A copy of an email dated 8 June 2020 from the Environment Agency pre-application service is presented at Appendix E. The pre-application advice confirms that a FPP is not required. Details of the control measures employed at the site to minimise the risk of fires are presented in the site Environmental Management System and are considered in the ERA presented at Appendix C.

2.11 Environment Agency guidance *Risk assessments for your environmental permit*¹ states that “*The Environment Agency may ask you to submit a noise and vibration impact assessment and a noise management plan if:*

- *your activity uses noisy plant or machinery, for example cooling equipment or fans*
- *you will be doing any noisy operations, such as loading or unloading, shredding, shearing, crushing, grinding, combustion, using trommels and conveyors or moving bulk materials*
- *your activities are not contained within buildings*
- *some of your activities take place at night*
- *the area where you are planning to carry out your activity is sensitive to noise, for example rural areas may have quieter background noise levels than urban areas*
- *there are sensitive receptors close to the site, for example houses or habitats”*

2.12 Although it is considered unlikely that the limited activities comprising the unloading of metal wastes from HGVs and loading of metal wastes on rail wagons will have a significant environmental impact in respect of noise, a noise impact assessment (NIA) has been undertaken and a noise management plan (NMP) has been prepared based on the findings of the NIA. A copy of the NIA and NMP prepared by Spire Environmental is presented at Appendix F. In the Executive summary of the NIA it is stated:

¹ <https://www.gov.uk/guidance/risk-assessments-for-your-environmental-permit> Environment Agency and Defra. Published 1 February 2016. Last updated 25 March 2021. Last accessed 13 December 2021.

“The BS 4142:2014 + A1:2019 assessment indicates that metal tipping and train loading/unloading operations will not exceed the adverse impact threshold of + 5dB at the closest residential properties.

Predicted internal noise levels at the closest residential properties and offices inside the closest industrial premises were within the specified limits in accordance with BS 8233.”

- 2.13** As the permit variation application does not propose to increase the permit boundary, it is unnecessary to include a Site Condition Report with the application.

3. Application form continuation

Application form Part A – Question 5c – Details of the directors

- 3.1 There are three officers included on the Companies House website for DB Cargo (UK) Limited. There is only space in Form Part A to enter the details of two officers. The details of the third officer are presented below: -

Title: Ms

First name: Deborah

Last name: Hardy

Application form Part A – Appendix 1 – Date of birth information

- 3.2 As the Appendix identifies that this information is required only for ‘*applications for a new permit or transferring a permit*’, Appendix 1 has not been completed.

Application form Part C2 – Section 3

- 3.3 The site will continue to be managed in accordance with a management system pursuant to Condition 1.1.1(a) of the permit using sufficient competent persons and resources pursuant to Condition 1.1.1(b) of the permit. A summary of the DB Cargo EMS is presented at Appendix G and the Certificate of Technical Competence (COTC) and Certificate of Continuing Competence for the technically competent site manager are presented at Appendix H.

Application form Part C4 – Table 3a – Technical standards

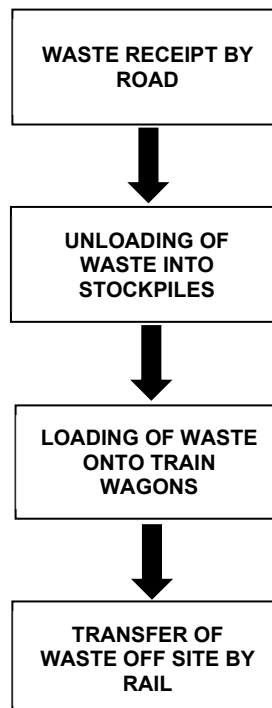
- 3.4 As the site comprises an inert and non-hazardous waste transfer station, the appropriate measures which are most relevant are “*Non-hazardous and inert waste: appropriate measures for permitted facilities²*” (the appropriate measures). Section 1 of the appropriate measures (*when appropriate measures apply*) states in paragraph 1.2 (*assessing appropriate measures for your site*)

²<https://www.gov.uk/guidance/non-hazardous-and-inert-waste-appropriate-measures-for-permitted-facilities>
Published 12 July 2021. Last accessed 27 October 2021

“Some measures in this guidance may not be suitable or relevant for your operation. Appropriate measures will depend on the:

- *activities being carried out*
- *size and nature of the activities*
- *location of the facility”*

3.5 The schematic diagram below illustrates the limited and low risk nature of the activities undertaken at the site which comprise only the receipt by road and transfer by rail of inert and excavation waste and scrap metal. There is no treatment of wastes at the site.



3.6 The site is located at a rail sidings in an area surrounded by commercial industry to the north west, south and south east and residential areas to the north east and south west.

3.7 The appropriate measures are subdivided into the following categories:

1. When appropriate measures apply
2. General management appropriate measures
3. Waste pre-acceptance, acceptance and tracking
4. Waste storage

5. Waste treatment
6. Emissions control
7. Emissions monitoring and limits
8. Process efficiency appropriate measures
9. Waste minimisation, recovery and disposal

3.8 Section 5 of the appropriate measures is not relevant as there are no treatment activities undertaken at the site and Section 8 of the appropriate measures is not relevant as these appropriate measures apply only to installations.

3.9 Further details relevant to Section 6 - emissions control are presented in the ERA at Appendix C and in the DEMP at Appendix D of this application. Section 6.1 of the appropriate measures refers to enclosure within buildings and states the following:

1. *Enclosing activities within buildings can be an appropriate measure for preventing and minimising emissions of pollution*
2. *If your waste treatment activities are likely to cause (or are causing) significant pollution at sensitive receptors which cannot be addressed by alternative measures, then you must carry out that waste treatment activity within an enclosed building.*
3. *You must also carry out non-treatment activities, such as storing and transferring waste (including loading and unloading) in enclosed buildings if these activities are likely to cause (or are causing) significant pollution at sensitive receptors which cannot be addressed by alternative measures. [Our emphasis]*

3.10 Point 2 above is not relevant as no waste treatment activities are undertaken at the site. Taking into consideration the guidance in relation to when appropriate measures apply which specifies that the appropriate measures will depend on the activities being carried out, the size and nature of the activities and the location of the facility, and the conclusions of the ERA it is considered that it is unnecessary to enclose the non-treatment activities comprising storing and transferring waste within a building as there is no risk that the activities are likely to cause significant pollution at sensitive

receptors. The control measures in respect of dust are specified in the DEMP and the control measures in respect of noise are specified in the NMP.

- 3.11** As no treatment of metal wastes is proposed the appropriate measures for permitted facilities treating metal waste in shredders are not applicable.

TABLES

Table 1
Waste types to be accepted at Barking Eurohub waste transfer station under Environmental Permit number EPR/GB3003GR

| LoW Code | Waste Description | Comment |
|----------|--|---------------------|
| 02 | WASTES FROM AGRICULTURE, HORTICULTURE, AQUACULTURE, FORESTRY, HUNTING AND FISHING, FOOD PREPARATION AND PROCESSING | |
| 02 01 | wastes from agriculture, horticulture, aquaculture, forestry, hunting and fishing | |
| 02 01 10 | waste metal | New waste type |
| 12 | WASTES FROM SHAPING AND PHYSICAL AND MECHANICAL SURFACE TREATMENT OF METALS AND PLASTIC | |
| 12 01 | wastes from shaping and physical and mechanical surface treatment of metals and plastics | |
| 12 01 01 | ferrous metal filings and turnings | New waste type |
| 12 01 03 | non-ferrous metal filings and turnings | New waste type |
| 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 04 | metallic packaging | New waste type |
| 16 | WASTES NOT OTHERWISE SPECIFIED IN THE LIST | |
| 16 01 | end-of-life vehicles from different means of transport (including off-road machinery) and wastes from dismantling of end-of-life vehicles and vehicle maintenance (except 13, 14, 16 06 and 16 08) | |
| 16 01 17 | ferrous metal | New waste type |
| 16 01 18 | non-ferrous metal | New waste type |
| 16 01 22 | components not otherwise specified (comprising only of depolluted metallic vehicle parts, components and engines) | New waste type |
| 17 | CONSTRUCTION AND DEMOLITION WASTES (INCLUDING EXCAVATED SOIL FROM CONTAMINATED SITES) | |
| 17 01 | concrete, bricks, tiles and ceramics | |
| 17 01 01 | concrete | Currently permitted |
| 17 01 02 | bricks | Currently permitted |
| 17 01 03 | tiles and ceramics | Currently permitted |
| 17 01 07 | mixtures of concrete, bricks, tiles and ceramics other than those mentioned in 17 01 06 | Currently permitted |
| 17 02 | wood, glass and plastic | |
| 17 02 02 | glass | Currently permitted |
| 17 03 | bituminous mixtures, coal tar and tarred products | |
| 17 03 02 | bituminous mixtures other than those mentioned in 17 03 01 | Currently permitted |
| 17 04 | metals (including their alloys) | |
| 17 04 01 | copper, bronze, brass | New waste type |
| 17 04 02 | aluminium | New waste type |
| 17 04 03 | lead | New waste type |
| 17 04 04 | zinc | New waste type |
| 17 04 05 | iron and steel | New waste type |
| 17 04 06 | tin | New waste type |
| 17 04 07 | mixed metals | New waste type |
| 17 04 11 | cables other than those mentioned in 17 04 10 | New waste type |
| 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 | Currently permitted |
| 17 05 08 | track ballast other than those mentioned in 17 05 07 | Currently permitted |
| 19 | WASTES FROM WASTE MANAGEMENT FACILITIES, OFF-SITE WASTE WATER TREATMENT PLANTS AND PREPARATION OF WATER INTENDED FOR HUMAN CONSUMPTION/INDUSTRIAL USE | |
| 19 01 | wastes from incineration or pyrolysis of waste | |
| 19 01 02 | ferrous materials removed from bottom ash | New waste type |
| 19 10 | wastes from shredding of metal-containing wastes | |
| 19 10 01 | iron and steel waste | New waste type |

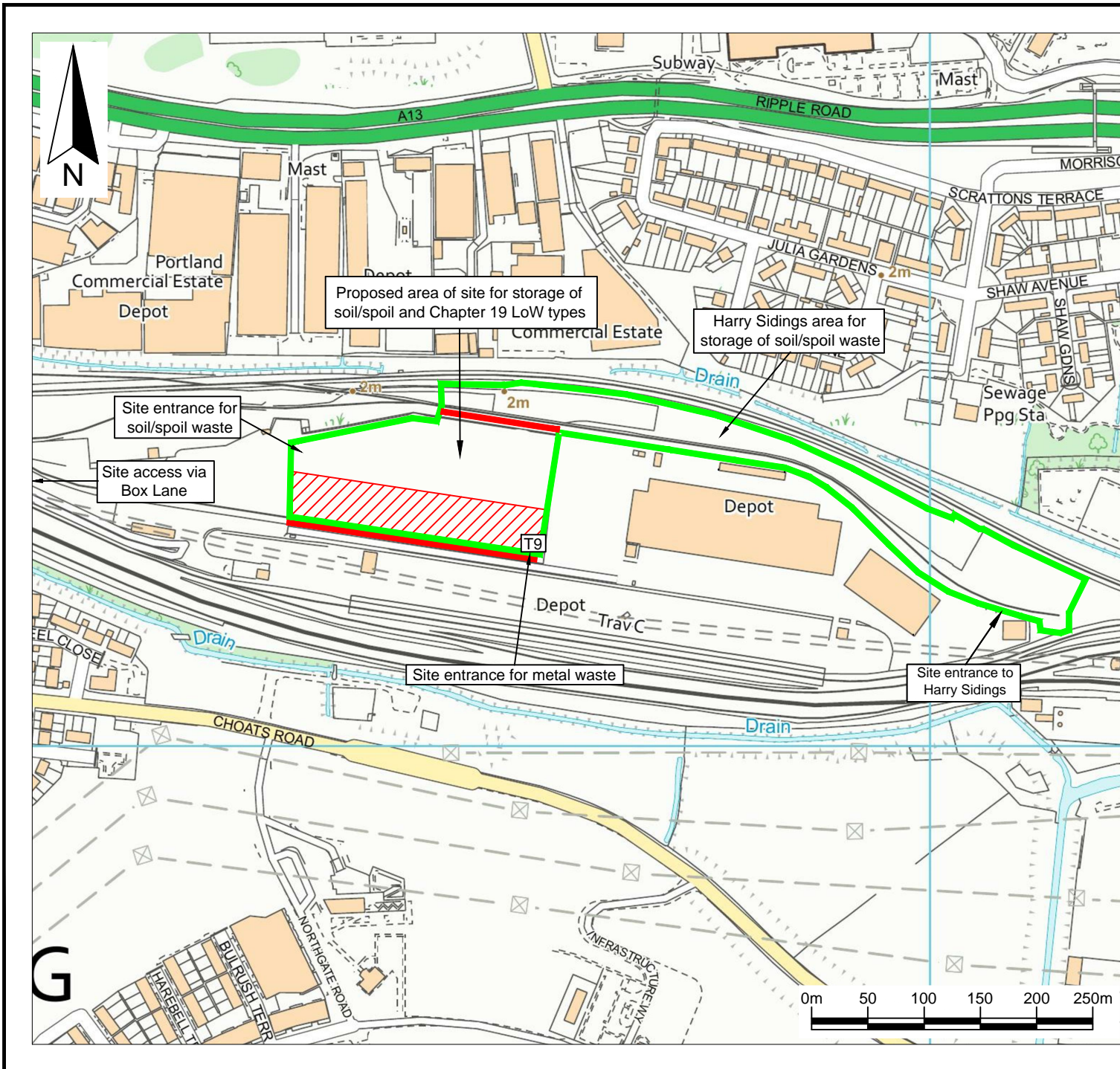
Table 1
Waste types to be accepted at Barking Eurohub waste transfer station under Environmental Permit number EPR/GB3003GR

| | | |
|----------|---|---------------------|
| 19 10 02 | non-ferrous metal | New waste type |
| 19 12 | wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified | |
| 19 12 02 | ferrous metal | New waste type |
| 19 12 03 | non-ferrous metal | New waste type |
| 19 12 12 | other wastes (including mixtures of materials) from mechanical treatment of wastes other than those mentioned in 19 12 11 | New waste type |
| 19 13 | wastes from soil and groundwater remediation | |
| 19 13 02 | solid wastes from soil remediation other than those mentioned in 19 13 01 | New waste type |
| 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 40 | metals | New waste type |
| 20 02 | garden and park wastes (including cemetery waste) | |
| 20 02 02 | soil and stones | Currently permitted |





Currently permitted wastes are shown in black text

New waste types the subject of the permit variation application are coloured in blue text

FIGURES



Key / Notes

-  Environmental Permit boundary
-  Proposed area of site for storage of metal wastes
-  Location of currently registered T9 waste exemption
-  Train loading area

| | | | | | |
|-----|--------|-----|-----|-----|----------|
| Rev | Draft | KR | AW | AW | 07/01/22 |
| | Status | Drn | App | Chk | Date |

Site: EUROHUB BARKING
 Client: DB Cargo (UK) Limited
 Title: The Environmental Permit boundary and activity areas

Figure 1 Scale: 1:5,000@A4

Drawing Ref: DBC/EU/12-21/22895

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APPENDICES

APPENDIX A
APPLICATION FORMS

APPENDIX B
NON-TECHNICAL SUMMARY

APPENDIX C
ENVIRONMENTAL RISK ASSESSMENT

APPENDIX D
DUST AND EMISSIONS MANAGEMENT PLAN

APPENDIX E
PRE-APPLICATION ADVICE FROM THE ENVIRONMENT AGENCY

APPENDIX F
NOISE RISK ASSESSMENT AND NOISE MANAGEMENT PLAN

APPENDIX G
EMS SUMMARY

APPENDIX H
TECHNICAL COMPETENCE CERTIFICATES