Project details	Environmental Permit Application
	EPR/BP3702MC/A001
	Larkshall Mill Aggregate Manufacturing Facility
Applicant details	O.C.O Technology Limited
	Avonmouth Aggregate Production Facility
	Off Central Avenue
	Hallen
	Avonmouth
	BS10 7SD
Report details	Installation EP Application
	Appendix F: Non-Technical Summary
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### 1 Introduction

#### 1.1 General

O.C.O Technology Ltd (the 'applicant') has requested that Reva Environmental Ltd (the 'agent') prepares an Environmental Permit (EP) application, for a new installation at Larkshall Mill, East Wretham, Thetford, Norfolk, IP24 1QY.

There is a permitted facility currently in operation at this location; the EP holder is the applicant, to whom the EP was transferred in June 2021 from Viridor Waste Management Limited (ref. EPR/KB3305ME/T001). The EP allows the acceptance and storage of waste and subsequent treatment consisting of physical sorting or separation into different components for disposal, recycling or reclamation. The operations are limited to a storage capacity of 2000 tonnes of waste at any one time (plus up to 1000 end-of-life vehicles) and treatment is limited to <50 tonnes per day.

## 1.2 Current Site Status

The MRF building has been decommissioned from use following damage incurred during a fire and will be demolished prior to the development for the aggregated production facility. Viridor remains on site under a lease agreement with the applicant/EP holder and is using the site as a transfer facility, importing, storing and transferring (already) baled recyclable materials.

# 1.3 Application Objective

The applicant wishes to apply for a new bespoke installation EP for the site. In accordance with EA advice received by email in November 2020 (ref. Jake Walker, 25/11/2020) this application is being made to allow flexibility in timing as the new EP can be issued while the existing EP remains active.

This application seeks to set out details of the new use of the site, and suggests that a pre-operational condition be used to make sure that the new activity does not commence until cessation of the existing activity and surrender of the existing EP.

The objective of this application is to ultimately install three lines that will treat air pollution control (APC) residues to create an aggregate that can be used in block manufacture. APC residues are delivered in powder tankers and transferred into silos, then into a reactor where they are treated with carbon dioxide to lower the pH and reduce the leachability of some heavy metals. The material is then mixed with cement, sand, and water to turn it into pellets. The pellets are stored in covered bays and used to make blocks. Processing is all carried out in a building. This process is already permitted at 3 other applicant sites in the UK:

- Leeds Aggregate Manufacturing Facility, EPR/TP3737YG/V005, permitted for 3 production lines;
- Avonmouth Aggregate Manufacturing Facility, EPR/HP3638WW/V004, permitted for 2 production lines (an application for a 3<sup>rd</sup> line is planned for 2022); and
- Brandon Aggregate Manufacturing Facility, EPR/JP3332FK, permitted for 2 production lines.

The application seeks to allow the following activities:

- 5.3 A(1)(a)(vi) Disposal or recovery of hazardous waste with a capacity exceeding 10 tonnes per day involving the recycling or reclamation of inorganic materials other than metals or metal compounds (R5). This listed activity will apply three times (AR1, AR2 and AR3) to reflect the three production lines and will allow a combined annual throughput of <100,000 tonnes) for the purposes of producing pellets; and
- 5.6 A(1)(a) Temporary storage (AR4) of hazardous waste with a total capacity exceeding 50 tonnes (R13). The maximum storage capacity is proposed to be 2,850 tonnes at any one time, and a maximum storage time of 6 months will be enforced, from the date of receipt of the waste.

Three directly associated activities (DAAs) are also proposed as follows:

- Handling and storage of wastes, prior to treatment and recovery activities for hazardous wastes (AR5);
- Storage of raw materials (AR6) for use within production lines AR1 to AR3; and
- Management of surface water for discharge (AR7) via surface water settlement lagoon. The long term (three line) plan includes the capture of clean (roof) water for reuse in the process and for dust control.

Each line will be an exact duplicate of the other, will process the same wastes and use the same raw materials to produce the aggregate. They will run in parallel so can be operated independently to provide flexibility of operations. The proposed daily throughput capacity for each line is 140 tonnes, which is 420 tonnes combined across all 3 lines.

# 2 Application Content

A new application has been made to the EA to cover the proposed activities above. The application comprises the following documents, in accordance with the EP Regulations and sector guidance notes:

- EP Application Form Parts A, B2, B3 and F1. The application form is provided at the front of the EP application document;
- Supporting Statement. This has been written to provide an explanation of the application to the EA and to provide signposts to the supporting information supplied in accordance with the application form;
- A copy of the pre-application advice provided by the EA, including a statement of the expected content and a habitat screening report (Appendix A);
- Details of technically competent management and associated competency certificates (Appendix B);
- A summary of the Environmental Management System that will be implemented at the site, to ensure that processes are operated in accordance with appropriate measures to prevent pollution (Appendix C);
- A set of site plans, detailing the location of the site, the layout of equipment and processes (including waste storage and emission points), drainage arrangements, and site setting (in relation to sensitive receptors). The site plans also defined the EP boundary (Appendix D);
- A site condition (baseline) report detailing the condition of the land prior to the commencement of operations under an EP. This considers known contamination, historical and current activities on and around the site, and the potential for pollution under the EP (Appendix E);
- An environmental risk assessment which assesses the proposed activities using a sourcepathway-receptor approach and which takes into account the presence of habitat sites within the relevant screening distance. A climate change risk assessment is also provided (Appendix G);
- A best available technique (BAT) assessment which describes the proposed activities and demonstrates that it accords with the suggested measures in the sector guidance (EPR 5.06) (Appendix H).