# NON-TECHNICAL SUMMARY

Simonswood Industrial Estate, Stopgate Lane, Simonswood, Knowsley, Merseyside, L33 4YB

**Simonswood Properties Limited**

| | | | | | |
|---|---|---|---|---|---|
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# 1 Introduction

**1.1** This Non-Technical Summary (NTS) accompanies an Environmental Permit (EP) variation application to add a separate physical treatment facility of non-hazardous waste to their existing permit i.e. EPR/GB3805TM submitted on behalf of Simonswood Properties Limited (the operator).

1.1.1 The operator is looking to retain all conditions of the extant permit with the addition of a new physical treatment activity. This application will only allow for a new separate activity comprising inert and CDE waste storage and processing and will therefore not increase any fire or odour risk at the site.

1.1.2 The site is at Simonswood Industrial Estate, Stopgate Lane, Simonswood, Knowsley, Merseyside, L33 4YB.

**1.2** As part of the additional activity, the site proposes to accept, store and treat the following wastes for recovery:

- Inert and CDE wastes

**1.3** Wastes will be processed for recovery using the treatment methods (*detailed in section 2.3*):

- Sorting, compacting, separation, screening, crushing, blending, and washing by using the appropriate plant

**1.4** The site is located at Simonswood Industrial Estate, Stopgate Lane, Simonswood, Knowsley, Merseyside, L33 4YB. The site is bordered by agricultural fields and industrial activities.

# 2 Application proposals

**2.1** Simonswood Properties Limited currently operate under a bespoke permit and are proposing to add an activity and EWC codes to their current permit; the operator does not want to change their existing permit or update it to a modern permit; they wish to retain the existing permit with the addition of a separate physical treatment activity under the activity reference below:

- Physical treatment of non-hazardous waste (referenced as 1.16.12 of the EPR 2019 charging tables).

**2.2** The site is currently permitted to accept 360,000 tonnes per annum; the operator is not looking to make any changes to the waste types or tonnages detailed in the existing permit; as part of the new activity the operator is proposing to accept an additional tonnage of 936,000 tonnes per annum (based on a worst-case scenario of the wash plant processing capacity being 3,000 tonnes per day and working 6 days a week).

**2.3** The activity is required for the storage (keeping) prior to removal, and treatment (all types of handling/processing) of waste i.e. HCI and CDE wastes. Waste treatment processes for the proposed additional physical treatment activity to be carried out on site may include the following:

- Sorting (with loading shovel / 360° excavator or by hand)
- Screening (by using appropriate mechanical screening plant and equipment)
- Separation (by using appropriate mechanical screening plant and equipment)
- Crushing (by using appropriate mechanical plant and equipment)
- Compacting (by using appropriate mechanical plant and equipment)
- Blending (by loading shovel / 360° tracked excavator)
- Washing (by use of appropriate wash plant)

**2.4** A list of proposed additional EWC codes in relation to this new treatment activity have been detailed below in Section 3. It is worth noting that the majority of EWC codes listed below are also already covered under the sites existing Permit.

**2.5** Specified waste management activities and associated limits for this proposed activity (including waste disposal and waste recovery operations) are listed in the table below:

| **Acceptance, storage and treatment of Inert & CDE waste.** | |
|---|---|
| **Description of activities for waste operations** | **Limits of activities** |
| D15: Storage pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where it is produced)<br><br>R13: Storage of waste pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where the waste is produced)<br><br>D14: Repackaging prior to submission to any of the operations numbered D1 to D13<br><br>D9: Physico-chemical treatment not specified elsewhere in Annex IIA which results in final compounds or mixtures which are discarded by means of any of the operations numbered D1 to D8 and D10 to D12<br><br>R3: Recycling/reclamation of organic substances which are not used as solvents<br><br>R4: Recycling/reclamation of metals and metal compounds<br><br>R5: Recycling/reclamation of other inorganic materials | Treatment of waste consisting only of sorting, compacting, separation, screening, crushing, blending, and washing into different components for disposal (no more than 50 tonnes per day) or recovery.<br><br>Subject to any other requirements of this permit wastes shall be stored for no longer than 3 years prior to recovery.<br><br>Treatment of slags and ashes for recovery and disposal shall not exceed 75 tonnes per day. |

# 3 Additional proposed EWC codes

**3.1** The table below details the additional EWC codes which the site would like to accept, store and treat under the proposed physical treatment activity; the existing permit activity (i.e. A11 HCI activity) will retain its own separate waste acceptance list/EWC codes as shown on the permit:

**Table 3.1 – Proposed EWC Codes**

| **Physical Treatment Facility** | |
|---|---|
| **Permitted waste types and quantities** | |
| **Maximum Quantities** | **The total quantity of waste accepted for this activity shall be less than 936,000 tonnes a year.** |
| **Waste Code** | **Description** |
| **01** | **Wastes resulting from exploration, mining, quarrying and physical and chemical treatment of minerals** |
| **01 01** | **wastes from mineral extraction** |
| 01 01 01 | wastes from mineral metalliferous excavation |
| 01 01 02 | wastes from mineral non-metalliferous excavation |
| **01 03** | **wastes from physical and chemical processing of metalliferous minerals** |
| 01 03 06 | tailings other than those mentioned in 01 03 04 and 01 03 05 |
| 01 03 99 | wastes not otherwise specified |
| **01 04** | **wastes from physical and chemical processing of non-metalliferous minerals** |
| 01 04 08 | waste gravel and crushed rocks other than those mentioned in 01 04 07 |
| 01 04 09 | waste sand and clays |
| 01 04 12 | tailings and other wastes from washing and cleaning of minerals other than those mentioned in 01 04 07 and 01 04 11 |
| 01 04 13 | wastes from stone cutting and sawing other than those mentioned in 01 04 07 |
| **01 05** | **drilling muds and other drilling waste** |
| 01 05 04 | freshwater drilling muds and wastes |
| **02** | **Wastes resulting from exploration, mining, quarrying and physical and chemical treatment of minerals** |
| **02 01** | **Wastes from agriculture, horticulture, aquaculture, forestry, hunting and fishing** |
| 02 01 01 | Sludges from washing and cleaning |
| 02 01 99 | wastes not otherwise specified |
| **02 02** | **waste from preparation and processing of meat, fish and other foods of animal origin** |
| 02 02 02 | shellfish shells from which the soft tissue or flesh has been removed only |
| 02 02 99 | wastes not otherwise specified |
| **02 04** | **waste from sugar processing** |
| 02 04 01 | soil from cleaning and washing beet |
| 02 04 99 | wastes not otherwise specified |
| **02 05** | **wastes from the dairy products industry** |

| **Physical Treatment Facility** | |
|---|---|
| **Permitted waste types and quantities** | |
| **Maximum Quantities** | **The total quantity of waste accepted for this activity shall be less than 936,000 tonnes a year.** |
| **Waste Code** | **Description** |
| 02 05 99 | wastes not otherwise specified |
| **02 07** | **wastes from the production of alcoholic and non-alcoholic beverages (except coffee, tea and cocoa)** |
| 02 07 01 | wastes from washing, cleaning and mechanical reduction of raw materials |
| 02 07 99 | wastes not otherwise specified |
| **03** | **Wastes resulting from exploration, mining, quarrying and physical and chemical treatment of minerals** |
| **03 01** | **wastes from wood processing and the production of panels and furniture** |
| 03 01 01 | waste bark and cork |
| **03 03** | **wastes from pulp, paper and cardboard production and processing** |
| 03 03 01 | waste bark and wood |
| **10** | **Waste from thermal processes** |
| **10 01** | **waste from power stations and other combustion plants** |
| 10 01 01 | bottom ash and slag only |
| 10 01 02 | pulverised fuel ash only |
| 10 01 03 | fly ash from peat and untreated wood |
| 10 01 05 | gypsum (solid) only |
| 10 01 07 | Calcium-based reaction wastes from flue-gas desulphurisation in sludge form |
| 10 01 15 | bottom ash and slag only from co-incineration other than those mentioned in 10 01 14 |
| 10 01 17 | fly ash from co-incineration other than those mentioned in 10 01 16 |
| 10 01 21 | sludges from on-site effluent treatment other than those mentioned in 10 01 20 |
| 10 01 23 | aqueous sludges from boiler cleansing other than those mentioned in 10 01 22 |
| 10 01 24 | sands from fluidised beds |
| 10 01 25 | wastes from fuel storage and preparation of coal-fired power plants |
| **10 02** | **wastes from the iron and steel industry** |
| 10 02 01 | wastes from the processing of slag |
| 10 02 02 | unprocessed slag |
| 10 02 14 | sludges and filter cakes from gas treatment other than those mentioned in 10 02 13 |
| 10 02 15 | other sludges and filter cakes |
| 10 02 99 | wastes not otherwise specified |
| **10 03** | **wastes from aluminium thermal metallurgy** |
| 10 03 05 | waste alumina |
| **10 05** | **wastes from zinc thermal metallurgy** |
| 10 05 01 | slags from primary and secondary production |
| **10 06** | **wastes from copper thermal metallurgy** |
| 10 06 01 | slags from primary and secondary production |
| **10 07** | **wastes from silver, gold and platinum thermal metallurgy** |
| 10 07 01 | Slags from primary and secondary production |
| **10 09** | **wastes from casting of ferrous pieces** |

| **Physical Treatment Facility** | |
|---|---|
| **Permitted waste types and quantities** | |
| **Maximum Quantities** | **The total quantity of waste accepted for this activity shall be less than 936,000 tonnes a year.** |
| **Waste Code** | **Description** |
| 10 09 03 | furnace slag |
| **10 10** | **wastes from casting of non-ferrous pieces** |
| 10 10 03 | furnace slag |
| **10 11** | **wastes from manufacture of glass and glass products** |
| 10 11 12 | clean glass other than those mentioned in 10 11 11 |
| **10 12** | **wastes from manufacture of ceramic goods, bricks, tiles and construction products** |
| 10 12 08 | waste ceramics, bricks, tiles and construction products after thermal processing) |
| **10 13** | **wastes from manufacture of cement, lime and plaster products and articles and products made from them** |
| 10 13 14 | waste concrete only |
| **15** | **Waste packaging** |
| **15 01** | **packaging** |
| 15 01 07 | clean glass only |
| **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 20 | glass |
| **17** | **Construction and demolition wastes (including excavated soil from contaminated sites)** |
| **17 01** | **concrete, bricks, tiles and ceramics** |
| 17 01 01 | concrete |
| 17 01 02 | bricks |
| 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 02 | glass |
| **17 03** | **bituminous mixtures, coal tar and tarred products** |
| 17 03 02 | bituminous mixtures other than those mentioned in 17 03 01 |
| **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 08** | **gypsum based construction material** |
| 17 08 02 | gypsum only other than that 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 |
| **19** | **Wastes from waste management facilities, off-site waste water treatment plants and the preparation of water intended for human consumption and water for industrial use** |

| **Physical Treatment Facility** | |
|---|---|
| **Permitted waste types and quantities** | |
| **Maximum Quantities** | **The total quantity of waste accepted for this activity shall be less than 936,000 tonnes a year.** |
| **Waste Code** | **Description** |
| **19 01** | **wastes from incineration or pyrolysis of waste** |
| 19 01 12 | bottom ash and slag other than those mentioned in 19 01 11 |
| 19 01 14 | fly ash other than those mentioned in 19 01 13 |
| 19 01 16 | boiler dust other than those mentioned in 19 01 15 |
| 19 01 18 | pyrolysis wastes other than those mentioned in 19 01 17 |
| 19 01 19 | sands from fluidised beds |
| 19 01 99 | wastes not otherwise specified |
| **19 02** | **wastes from physico/chemical treatments of waste (including dechromatation, decyanidation, neutralisation)** |
| 19 02 03 | premixed wastes composed only of non-hazardous wastes |
| 19 02 06 | sludges from physico/chemical treatment other than those mentioned in 19 02 05 |
| 19 02 99 | wastes not otherwise specified |
| **19 05** | **wastes from aerobic treatment of solid waste** |
| 19 05 03 | off-specification compost |
| 19 05 99 | wastes not otherwise specified |
| **19 08** | **wastes from waste water treatment plants not otherwise specified** |
| 19 08 01 | screenings |
| 19 08 02 | washed sewage grit (waste from desanding) free from sewage contamination only |
| 19 08 12 | sludges from biological treatment of industrial waste water other than those mentioned in 19 08 11 |
| 19 08 14 | sludges from other treatment of industrial waste water other than those mentioned in 19 08 13 |
| 19 08 99 | wastes not otherwise specified |
| **19 09** | **wastes from the preparation of water intended for human consumption or water for industrial use** |
| 19 09 01 | solid waste from primary filtration and screenings |
| 19 09 02 | sludges from water clarification |
| 19 09 03 | sludges from decarbonation |
| 19 09 04 | spent activated carbon |
| 19 09 99 | wastes not otherwise specified |
| **19 12** | **wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified** |
| 19 12 05 | clean glass only |
| 19 12 09 | minerals (for example sand, stones) |
| 19 12 12 | treated bottom ash including IBA and slag other than that containing dangerous substances only |
| 19 12 12 | other wastes (including mixtures of materials) from mechanical treatment of wastes other than those mentioned in 19 12 11 – Incinerator Bottom Ash Aggregate (IBAA) only. |
| 19 12 12 | other wastes (including mixtures of materials) from mechanical treatment of wastes other than those mentioned in 19 12 11 comprising of non-hazardous soils, stones and aggregates only |
| 19 12 12 | other wastes (including mixtures of materials) from mechanical treatment of wastes other than those mentioned in 19 12 11 |
| **19 13** | **wastes from soil and groundwater remediation** |

| **Physical Treatment Facility** | |
|---|---|
| **Permitted waste types and quantities** | |
| **Maximum Quantities** | **The total quantity of waste accepted for this activity shall be less than 936,000 tonnes a year.** |
| **Waste Code** | **Description** |
| 19 13 02 | solid wastes from soil remediation other than those mentioned in 19 13 01 |
| 19 13 04 | sludges from soil remediation other than those mentioned in 19 13 03 |
| 19 13 06 | sludges from groundwater remediation other than those mentioned in 19 13 05 |
| 19 13 08 | aqueous liquid wastes and aqueous concentrates from groundwater remediation other than those mentioned in 19 13 07 |
| **20** | **Municipal wastes (household waste and similar commercial, industrial and institutional wastes) including separately collected fractions** |
| **20 01** | **separately collected fractions** |
| 20 01 02 | clean glass only |
| 20 01 41 | wastes from chimney sweeping |
| 20 01 99 | other fractions not otherwise specified |
| **20 02** | **garden and park wastes** |
| 20 02 02 | soil and stones |
| **20 03** | **other municipal wastes** |
| 20 03 03 | street cleaning residues |
| 20 03 99 | wastes not otherwise specified |

# 4 Noise Justification

## 4.1 Noise Sources

4.1.1 The noise comprising the wash plant and ancillary activities include:

- Feed hopper
- Logwasher
- Thickener, water and buffer tanks
- Overband magnets
- Screener, secondary screener and scalping screen
- Filter press
- Discharge bays
- Sorting/movement of product and material using the sites loading shovel/grab
- Loading/unloading of HGVs

4.1.2 These noise sources are understood to range from between 2m and 4m in height.

## 4.2 Background and setting

4.2.1 The operations are located to the south of Stopgate Lane, east of the existing operations.

4.2.2 Reference should be made to the proposed site layout plan which indicates the layout of the plant as well as the existing 4m high bund.

4.2.3 The nearest noise sensitive receptors are located approximately 200-225m from the northern site boundary off Stopgate Lane, whilst additional receptors are located 275m west of Sidings Lane. These receptors are adequately screened via the 4m high bund.

4.2.4 Additional receptors are located 750m+ to the south of the site.

4.2.5 The receptors are located within a very industrialised area with varying commercial and industrial noise sources located within the vicinity of the dwellings. In addition,

Stopgate Lane is a busy A-Road serving the industrial area and housing to the west. Road traffic has been observed to be constant and include a high proportion of HGVs.

4.2.6 This results in a high existing background level with an existing noise climate including audible contributions from; road traffic, ventilation systems and audible bangs/crashes from the loading and unloading of HGVs (including reversing alarms etc.) amongst others.

4.2.7 The above observations have been based on historic monitoring and Noise Impact Assessments undertaken by Oaktree Environmental and others.

## 4.3 Impulsive/tonal

4.3.1 Based on experience from similar operations, the plant contains a tonal element, however considering the surrounding background level and existing noise climate, which is predominantly influenced by road traffic, this is likely to be masked considerably.

4.3.2 However, the impulsive crashes/bangs associated with the operation of the plant and ancillary operations may be just perceptible at the nearest residential dwellings. These will not be out of character for the area are likely to be muffled somewhat by the 4m high noise bund.

## 4.4 Mitigation and additional Measures

4.4.1 As mentioned previously, the noise sources will be screened via the existing noise bund which will be maintained by site management.

4.4.2 The noise sources will be operated as per the operational hours detailed in the EP.

4.4.3 Reference should also be made to the EMS which specifies the details of preventative measures and maintenance. This will ensure the plant is free from any faults which could result in higher than usual noise emissions.

4.4.4 Should a complaint be received, either directly from a local resident, the Local Authority or Environment Agency, site management will investigate accordingly and provide a response as soon as possible.

## 4.5 Conclusions

4.5.1 The plant is located within a heavily industrialised area with high background levels. The noise levels associated with the operation of the plant are unlikely to exceed these background levels to such a degree as to warrant significant additional assessment or mitigation at this stage. This is largely as a result of the existing mitigation which will be retained by site management.

4.5.2 The character of the noise sources is not significantly out of context with the surrounding area and operational hours (which are not unsociable) are comparative to the surrounding land uses.

4.5.3 Historic NIAs associated with the previous applications indicate that the rating level associated with the wash plant is below that of the measured background level and therefore a low impact is assumed.

4.5.4 It is therefore considered that the risk associated with noise emissions is low.

4.5.5 In addition, relevant planning conditions are in place at the adjacent facility (*for a wash plant activity which is also located closer to nearby receptors; consequently, noise from the wash plant would be lower than has been calculated under the previously approved wash plant outside dwellings to the north (due to additional distance and attenuation) and thus would not give rise to unacceptable noise impact at dwellings to the north*).

4.5.6 Condition 8 of the planning ref: LCC/2018/0050 states that '*Noise emitted from the development shall not exceed 55dB(A)LAeq, 15min, as measured or calculated at the boundary of any nearby residential dwelling'.*

# 5 Documentation and fees

**5.1** This application constitutes a Bespoke Environmental Permit as per table 1.16 of the charging guide table reference 1.16.12.

**Table 5.1 – Base Application Fee Table**

| EPR Charging Scheme Ref | EPR Charging Scheme Ref & Description | Type of application (Ref) | Fee |
|---|---|---|---|
| 1.16.12 | Physical Treatment Facility for non-hazardous waste | New Bespoke Activity | **£7,930** |
| | | **TOTAL** | **£7,930** |

**Table 5.2 – Additional Application Fees Table - Charges for plans and assessments**

| General | Consideration | Document & Ref | Fee |
|---|---|---|---|
| Environmental Management System | Required due to permitted activities | 2358-003-A | |
| Non-Technical Summary | As Above | 2358-003-**C** | |
| Environmental Risk Assessment | As Above | 2358-003-**D** | |
| Dust Management Plan | As Above | 2358-003-**H** | **£1,241** |
| | | **TOTAL** | **£1,241** |

**5.2** Although the extant permit is a HCI permit, this application will only allow for the addition of a separate physical treatment activity for inert & CDE wastes; it is therefore considered that the site will not be increasing the odour and fire risk at the site as the extant permit will remain the same.

**5.3** The proposed activity will not increase the environmental risk; the wash plant will significantly improve the environmental risk by reducing the potential dust levels

generated at the site whilst also significantly reducing the storage capacity on site by allowing existing Inert & CDE waste to be processed quicker and more efficiently.

**5.4** The operator currently operates under a bespoke permit and the only reason for this variation is to add the proposed wash plant activity and additional EWC codes (*most of which are already permitted under the existing permit*), none of which are hazardous.

**5.5** Accompanying this Non-technical Summary, the following will also be submitted as part of this application:

a) Application forms Parts A, C2, C4 & F1

**5.6** Based on the above, the total fee payable to the Environment Agency on submission will be **£9,171.00**