

Your reference: DM115/2/23
Our reference: Response to RFI for DM ZP3439RM

FAO: Ms Judith Ford
Permitting Officer – Installations
National Permitting Service Part of Operations

Sent by E-mail only to: judith.ford@environment-agency.gov.uk
Also copied to: susan.crossland@environment-agency.gov.uk

28th February 2023

Dear Ms Ford,

Thank-you for your letter, reference: DM115/2/23 dated 16th February 2023, which requested further information regarding the Environmental Permit variation application for the Knowsley Waste Facility, EPR/ZP3439RM/V004.

We have summarised and responded to your queries below.

1) You have requested that we provide an air emission risk assessment which includes emissions from the diesel generator. You note that “whilst the generator has a thermal input of less than 1MW and is not MCP, the specified generator (SG) regulations will inform the site specific BAT”.

However, as a generator with an individual and aggregated capacity of less than 1 MW_{th}, the unit does not qualify as an SG and therefore, despite being installed at an installation, the SG Regulations should still not be applied as BAT.

Gov.uk guidance (<https://www.gov.uk/guidance/specified-generator-when-you-need-a-permit>) confirms that:

Specified generator controls, unless excluded, apply to generators with a rated thermal input between 1MW_{th} and 50MW_{th}.

They also apply to generators less than 1MW_{th}, if they:

- have a capacity agreement or an agreement to provide a balancing service
- are part of a specified generator group which in total has a rated thermal input of between 1MW_{th} and less than 50MW_{th}

None of the above apply in this case. The generator is a stand-alone unit with no additional generation capacity at the site. It has a thermal input capacity of less than 1 MW_{th} and it is not part of a capacity agreement or an agreement to provide a balancing service. Therefore, it cannot be described as a ‘specified’ generator and the requirements of the SG regulations do not apply. Nor should the unit be required to meet the emission limit value (ELV) for Oxides of Nitrogen (190 mg Nm⁻³) applicable to units with a capacity of 1 MW_{th} or more, even as site-specific Best Available Techniques (BAT) for the installation, as this is an ELV for specified generators.

As such, the air emission risk assessment that has already been provided with the application is considered to be appropriate and has not been updated and re-submitted here. Please respond should you consider that our interpretation of the regulations is incorrect.

2) You have requested that we provide a process flow / block diagram for the regulated facility which includes the proposed changes. You have requested that this is labelled with any relevant Scheduled Activity reference and capacity.

We note that, in addition to the diagrams of individual operations, the process flow diagram on page 65 of the Supporting Documentation already submitted included a flow diagram for the entire installation.

However, since the original submission, an alteration to the proposal has been identified, which contributes to our response to your third question (below).

The original planned activities at the site, detailed in our original submission, assumed that hazardous and non-hazardous wastes would be sorted in the eMax (activity references A3 and A6). However, it has now been confirmed that the incorporation of a float : sink tank between the Multec and the eMax will remove the hazardous fraction of the materials from the eMax feedstock. Therefore, the eMax will not receive hazardous waste and will only be required to treat non-hazardous wastes (activity reference A6). However, the incorporation of a float : sink tank as an integral part of the Multec / eMax operation, with a potential processing capacity of more than 10 tonnes mixed (including hazardous) waste per day is a new scheduled activity (S5.3 A(1) (a) (ii)) and can now become activity reference A3. I note however that, irrespective of the fact that this additional process step is reasonably associated with the Multec (activity reference A2 which is already subject to a substantial variation), it also carries the same application activity description of that, and now the retort (S5.3 A(1) (a) (ii)) and therefore, the cost of including this float : sink tank process into the application reduces all but the highest charge for the same activity descriptions by 90 % (see extract from The Environment Agency (Environmental Permitting and Abstraction Licensing) (England) Charging Scheme 2022. Version 1.1 in Appendix 1). This is discussed in greater detail in response to your fifth question (below).

We have therefore revised and expanded our process flow / block diagram, and this is now presented over page.

A description of the float : sink tank and its operation follows:

The specific gravity of water is 1,000 kg m⁻³ and as such, polypropylene (PP) and polyethylene (HDPE and LDPE) which have lower densities will float in water. Other contaminants such as glass, grit and dirt will sink because of their denser structure.

Although no specific manufacturer has yet been confirmed for the provision of the float : sink tank to be installed at the Knowsley Waste facility, such processes are typically fed by a belt conveyor, screw auger or blower. Depending on the application the material can be discharged onto the surface of the tank, or fed by a screw feeder submerged into the tank, which helps to give a uniform flow into the tank, breaking up any lumps, and ensuring that all materials are fully submerged at the start of the process. This produces a high purity product as all particles are forced to either float or sink.

The floating fraction is driven along the surface of the float sink tank by a series of rotating paddles. Each paddle completely submerges the floating fraction as it is pushed along the surface of the float sink tank. The speed of the rotating paddles can be changed to vary the agitation and the discharge rate. The floating fraction is transferred into an incline discharge screw via a weir at the end of the float sink tank and is removed for further processing through the eMax system. The sunken fraction collects at the base of the tank and is similarly transferred into an incline discharge screw, and is deposited into a collection container for storage prior to removal from site for disposal.

Monitoring, both during the commissioning phase of the process and then quarterly once operational will confirm that the floating materials comprise PP, HDPE and LDPE and do not contain any persistent organic pollutants (POPs). This material will then pass onto the eMax process for further screening and sorting. The collected sunken fraction is assumed to be hazardous and to contain POPs and will be sent for high temperature incineration for disposal.

Float : sink tanks capture, filter and re-circulate the water that might otherwise be lost when extracting the separated waste fractions, thereby minimising the top-up requirements of the tank.

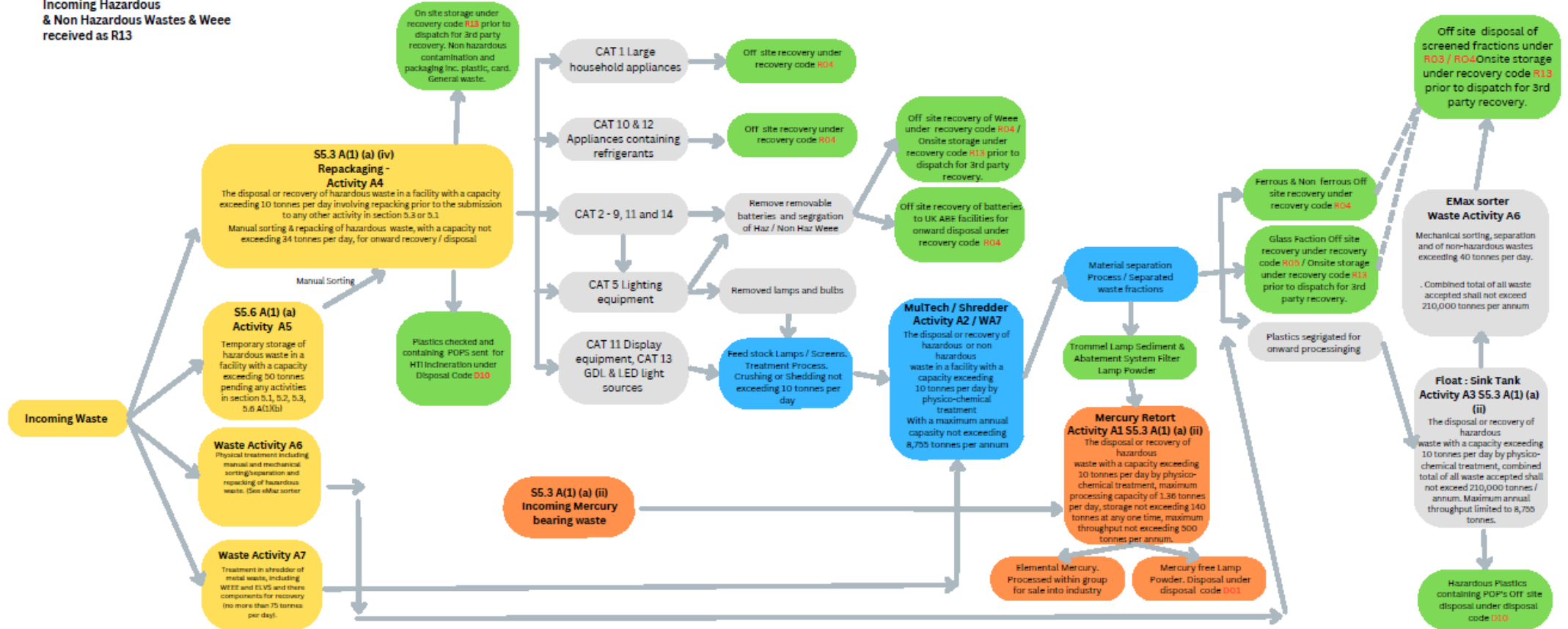
Please do not hesitate to contact me if you require any further information on the switch of activity reference A3 from the eMax for sorting hazardous wastes (now no longer required) to the use of a float : sink tank to separate out the hazardous and non-hazardous fractions prior to further processing.

Expanded Process Flow Diagram

Mulberry Waste Limited, Knowsley Waste Facility, Application reference: EPR/ZP3439RM/V004

Facility Process Flow Diagram

Incoming Hazardous & Non Hazardous Wastes & Weee received as R13



- 3) Please confirm how you will operate the eMax sorter for both hazardous and non-hazardous waste? Will it be a batch process?

As stated above, the eMax sorter will now only be used to process non-hazardous wastes as the hazardous fraction will have been pre-separated by the float : sink process step. The eMax sorter can be operated continually, assuming a constant feed, or can be operated as a batch process where required.

- 4) The application requests the addition of a S2.2 A (1)c activity to the permit to allow the recovery of mercury in a retort. This activity is now considered hazardous waste treatment process and is more appropriately defined under S5.3 Part A(1)a ii) This is because the BAT Reference Document (BREF) and BAT Conclusions for the Non-Ferrous Metal Industries does not include recovery of mercury or the use of vacuum distillation, whereas the Waste BREF and BAT Conclusions do list vacuum distillation as a technique to recover mercury from hazardous waste streams such as batteries, fluorescent tubes etc. This will have implications for the variation fees payable (see below) and you will need to amend the application.

The reasoned justification provided by the Environment Agency to re-classify the Mercury retort process specifically as a physico-chemical waste activity is accepted. Therefore, we formally request that our application reclassifies our proposed activity reference A1 as a Scheduled S5.3 A(1) (a) (ii) activity. To that end, I have reproduced Table 1 from Form C2 and Table 1a from Form C3 in Appendix 2 of this submission by way of re-classifying the activity in our application. Should you require any further confirmation of such, please do not hesitate to contact me.

Having reviewed the Waste Treatment BREF and BAT-Conclusion documents with specific regard to the Mercury retort operation, Mulberry Waste Limited is satisfied that their proposed operations comply with the requirements under the revised classification, with the exception of their proposal to monitor emissions to air from the retort stack every six months rather than quarterly. Mulberry Waste Limited is happy to commit to three monthly testing rather than six monthly, to monitoring standard EN 13211 where required.

In order to confirm compliance with the BAT-Conclusions, I have provided a summary below of the requirements and proposals, as already specified in the original application documentation.

BAT-C Number	Summary of BAT-Conclusion Requirement	Summary of Proposal
BAT 7	Monitoring and treatment options (BAT 20) of emissions to water	Not applicable. There are no effluent emissions from the process, which is located within a process building and therefore, there is also no surface water run-off to discharge
BAT 8	Monitoring emissions to air to standard EN 13211 once every three months	Independent monitoring to EN 13211 is proposed. This was originally proposed at six monthly intervals but can be increased to quarterly if required. Mercury emissions from the retort stack should readily comply with the BAT-AEL range of 2 – 7 µg Nm ⁻³
BAT 25	Reduce potential emissions to air through the use of (as appropriate) cyclones, fabric filters and / or wet scrubbers	The exhaust air passes through a hot air filter and a dual bed activated Carbon column prior to release, thereby minimising Mercury and other pollutant releases
BAT 26	Overall environmental performance control: good housekeeping / clean the entire waste treatment area; detailed inspection of incoming wastes; removal of dangerous items for safe disposal	Strict housekeeping measures are in place across all Mulberry Waste Limited operations. The purpose of the retort is to recover Mercury and the inputs to the process are carefully controlled such that they only include appropriate wastes
BAT 32	Preventing diffuse emissions by enclosing processes, applying negative pressure and local exhaust ventilation where required. Ensuring that the efficiency of the treatment is monitored and Mercury levels in the work area are measured at least once per week	The retort is a purpose built, fully enclosed process which regulates the pressure and temperature of the operation at every stage. The application of a negative vacuum system ensures that no Mercury vapour can leak from the system, and each process vessel with any possibility of containing Mercury is maintained under a partial vacuum. The retort also has a number of safety systems and shut-down mechanisms which activate automatically in the event of an incident. Mulberry Waste Limited is committed to undertaking occupational monitoring around the process areas, daily when either the Multec and / or retort are in use
BAT 40	With regard to the treatment of solid and pasty wastes, the requirement is to monitor the organic content of the input	Incoming Mercury bearing wastes are assessed as to their level of contamination prior to the retort programme being chosen and set. The process does not require physical testing and quantification of the levels of Mercury present prior to processing

Waste residues from the retort process comprise Mercury free Phosphor powder only which will be sent for disposal to landfill (D01). The principal purpose of the retort process is the recovery of Mercury (R04).

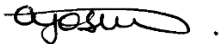
- 5) You have suggested that the application payment may be incorrect and have provided proposed costings. You have provided and asked us to review a costings table, which you consider results in an application charge of £79,590.

We have considered your costings table and we disagree with the proposed costings. We have replicated and expanded your table over page to include our understanding of the Environment Agency Fees and Charges scheme (see also Appendix 1), and proposed some limitations to disconnect the physical processing capacities of the plant from the site throughputs. As a result, we calculate a subsequent, revised total of **£22,741.20**.

Assuming that you agree that our revised assessment is correct, we calculate that an additional payment of **£1,046.60** is now actually due. Please confirm.

Please do not hesitate to contact me should you have any queries or comments in relation to this letter. I look forward to hearing from you in due course.

Yours sincerely,



Dr Amanda Owen.
Environmental Consultant.
Environmental Visage Limited.

Cost Comparison Table

New / Existing Activity	Proposed Changes	Variation Fee	Comments	Payments
New Activity S5.3 A (1)a ii) Disposal or recovery of hazardous waste with a capacity exceeding 10 tonnes per day involving physico-chem treatment	Addition of new activity – Mercury retort	£16,001 new application fee 1.16.1.2	If the Agency consider S5.3 A (1) a ii) activity to be more appropriate then this is accepted. Increased fee to pay:	£16,001 due £11,813 already paid (+ £4,188 to pay)
Existing activity S5.3A(1)a ii) Disposal or recovery of hazardous waste with a capacity exceeding 10 tonnes per day involving physico-chem treatment	New Multec process to replace tube crusher and increase in throughput for activity from 8,755 to 43,800 tonnes per year. Substantial variation to existing activity as the increase in throughput per day will increase more than the activity threshold of 10 tonnes.	£14,401 sub. variation fee 1.16.1.2	Physical capacity of the plant (Multec and shredder) could process 166 T/day. However, Mulberry will limit annual throughput to 8,755 T/annum. Insufficient waste available to justify any increase. Multec process is a replacement for tube crusher which is already permitted. Multec is also associated with the Retort as the aim is to retrieve the Mercury. Hence 50 % substantial variation fee already paid was appropriate. However, as the retort is now an S5.3 A(1) (a) (ii) activity, this should reduce to 10 % of the fee	No additional fee to pay. 50 % of the substantial variation fee has already been paid (£7,200.50). This should reduce to £1,440.10 (10 % of the fee) due to same activity ref. (- £5,760.40 over payment)
New Activity S5.3 A (1)a ii) Disposal or recovery of hazardous waste with a capacity exceeding 10 tonnes per day involving physico-chem treatment	New activity eMax sorter not in current permit. Designed to be a standalone sorting activity for hazardous waste and non-hazardous waste.	£16,001 new application fee 1.16.1.2	eMax will now NOT be used for hazardous waste as this can be segregated using a float : sink tank prior to processing. New float : sink tank will be directly associated with the existing S5.3 A(1) a ii) process above and may exceed 10 tonnes per day, receiving material from the Multec and the shredder only. Float : sink tank now becomes A3.	£1,440.10 (10 % of the substantial variation fee) for the connected Multec system (above) was originally paid, due to same activity ref. As a new activity this should increase to 10 % of new application fee £1,600.10 (+ £160 to pay).
Existing activity S5.3 A (1) a iv) disposal or recovery of hazardous waste with a capacity exceeding 10 tonnes per day involving repackaging	Significant increase in repackaging capacity. Current permit limits activity to 12,730 tonnes per year (34 tonnes/day), proposed increase will be 210,000 tonnes per year so an increase to 575 tonnes/day. The increase in throughput per day will increase more than the activity threshold of 10 tonnes	£14,401 sub variation 1.16.1.3	Storage at the site will increase (see below). However, the hazardous waste repackaging potential does not have to. Limit re-packaging to existing capacity of 12,730 T/annum. No change and no fee to pay.	No fee to pay.

New / Existing Activity	Proposed Changes	Variation Fee	Comments	Payments
Existing activity S5.6 A (1) a) Temporary storage of hazardous waste with a total capacity exceeding 50 tonnes ...	Storage capacity for waste oil and oily waste has decreased but other hazardous waste storage has increased	£2,459 minor technical variation 1.16.4	Storage activity is already covered because the activity regulates a capacity exceeding 50 tonnes. Additionally, and bearing in mind the other changes proposed, all of which will require a waste storage element, this additional cost is queried. However, if the Environment Agency confirm that the additional charge is indeed due, the minor technical variation fee is acceptable.	No payment currently made (+ £2,459 to pay)
Existing waste activity eMax sorter Non-Hazardous waste	Significant increase in non-hazardous manual/mechanical sorting, separation, and repacking	£3,965 normal variation 1.16.11	This is not a scheduled activity, it is a waste activity. There is no capacity threshold specified for the waste activity and as such, the increase does not incur a cost. The activity is already on the Permit. Bearing in mind the lack of any capacity specification (exceeding or otherwise), and previous experience where no specific fee has been charged for changes in tonnages when additional to other elements, there is no fee to pay.	No fee to pay.
Existing waste activity metal shredding including WEEE and ELVs increasing capacity to become S5.4 A(1)(b)	Increase in shredding capacity to 120 tonnes/day waste activity will become an installation S5.4A(1) b) recovery or a mix of recovery and disposal of non-hazardous waste with a capacity exceeding 75 tonnes per day involving treatment in shredders of metal waste including waste electrical and electronic equipment and end of life vehicles and their components.	£11,121 substantial variation 1.16.2.5	Physical capacity of the shredder plant is 120 T/day. However, Mulberry will limit annual throughput to < 75 T/day thereby retaining the waste activity status for this process. Insufficient waste available to justify any increase. No change and no fee to pay.	No fee to pay.
Fire Prevention Plan		£1,241	Agreed and already paid.	No fee to pay.
Accepting the outstanding query regarding hazardous waste storage, although noting our acceptance of the minor technical variation fee if required, the total difference is: proposed fee £22,741.20 - fee paid (26/10/2022) £21,694.60 = + £1,046.60				+ £1,046.60

Appendix 1 Extract from: The Environment Agency (Environmental Permitting and Abstraction Licensing) (England) Charging Scheme 2022. Version 1.1

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1098117/Environment_Agency_EPR_and_Abstraction_Licensing_Charging_Scheme_2022.pdf

Pages 10 and 11.

'(3) Where more than one application activity (other than a flood risk activity) is the subject of an application for a permit, the application activity charge for each activity, except the one for which the largest charge is payable, is reduced by -

(a) 90% for all those activities which –

(i) fall in the same application activity description;

(ii) comprise the storage of hazardous waste, incidental to an installation carrying on activities falling within either reference 1.16.1 or 1.16.4 of the Environmental Permitting Application Charge Tables;

(iii) comprise the treatment of non-hazardous effluent and its subsequent discharge to sewer where associated with each other;

(iv) as part of the same operation, abstract water from the same source of supply, excepting any activity which is the subject of a renewal application or which is an environmentally beneficial activity;

(v) comprise the abstraction of water for an open-loop heat pump with any discharge associated with the open-loop heat pump;

(b) 50 % for any other activities which –

(i) are reasonably associated with each other,

(ii) as part of the same operation, abstract water from different sources of supply, excepting any activity which is the subject of a renewal application, or which is an environmentally beneficial activity;...'

Appendix 2 Update of Table 1 from Form C2 and Table 1a from Form C3

Tables have been updated where highlighted.

Form C2 Table 1 Changes to Existing Activities at the Knowsley Waste Facility

Schedule 1 Reference	Current Description of Installation Activity	Proposed Changes
S. 5.3 A(1) (a)(ii) – disposal or recovery of hazardous waste > 10 T / day by physico-chemical treatment	Activity is not included	Inclusion of a new installation activity onto the Permit: Retort for recovering Mercury
S. 5.3 A(1) (a)(ii) – disposal or recovery of hazardous waste > 10 T / day by physico-chemical treatment	Activity shall be limited to: <ul style="list-style-type: none"> The crushing of fluorescent tubes; The crushing or shredding of metal containers; The shredding of oil filters. Hazardous waste accepted for disposal will not exceed 10 T / day. Combined total of all waste accepted shall not exceed 221,700 T / annum	Activity shall be limited to: <ul style="list-style-type: none"> The crushing of fluorescent tubes and sorting of the waste fractions in the Multec system (or equivalent) for subsequent recycling; The shredding of flat panel displays / screens and sorting of the waste fractions in the Multec system (or equivalent) for subsequent recycling; The shredding of other WEEE waste in a WEEE shredder. Combined total of all waste accepted shall not exceed 210,000 T / annum
S. 5.3 A(1) (a)(ii) – disposal or recovery of hazardous waste > 10 T / day by physico-chemical treatment	Activity is not included	Inclusion of a new installation activity onto the Permit: Float : sink tank for the separation of hazardous and non-hazardous wastes
S. 5.3 A(1) (a)(iv) – disposal or recovery of hazardous waste > 10 T / day involving repackaging	Hazardous waste accepted for disposal will not exceed 10 T / day. Combined total of all waste accepted shall not exceed 221,700 T / annum	Including sorting, separation and bulking Combined total of all waste accepted shall not exceed 210,000 T / annum
S. 5.6 A(1) (a) – Temporary storage of hazardous waste with a capacity exceeding 50 T	Wastes shall be stored for no longer than 180 days. Maximum quantity of oil and oily water shall not exceed 750 T. Maximum quantity of hazardous waste stored pending recovery shall not exceed 375 T. Combined total of all waste accepted shall not exceed 221,700 T / annum	Reduction in the potential waste oil storage from 750 to 25 T at any one time Increase in potential maximum storage of hazardous waste to the total site storage capacity (575 T total) Combined total of all waste accepted shall not exceed 210,000 T / annum

Waste Operations	Current Description of the Waste Operation		Proposed Changes
Manual and mechanical sorting, separation and repackaging of non-hazardous wastes	Maximum quantity of waste that can be stored at any one time is 40 T		Reference will be made to the inclusion of the float : sink tank which uses new plant to undertake the operations already Permitted Increase in potential maximum storage of non-hazardous waste to the total site storage capacity (575 T total) Combined total of all waste accepted shall not exceed 210,000 T / annum
Waste Operations	Current Description of the Waste Operation		Proposed Changes
Shredding of metal waste including WEEE and ELVs and their components for recovery	Wastes shall be stored for no longer than 180 days. Maximum quantity of waste that can be stored at any one time is 40 T		Change description to: Maximum quantity of waste that can be treated in any one day is 74.99 T
Non-hazardous waste storage	Wastes shall be stored for no longer than 180 days.		Include the potential maximum storage of non-hazardous waste to the total site storage capacity (575 T total)
Directly Associated Activity (DAA)	Description of the DAA	Limitations of the Activity	Proposed Changes
Utilities and services	Operation of systems for supply of utilities and services such as electricity, gas and water	Utilities and services within the installation boundary	Addition of a 275 kVa diesel fired generator (< 300 kW thermal input). Operational for up to 3,000 hours per annum currently advised to Environment Agency (in Reg. 61 Notice response) but unlimited operating hours going forward (8,760 h / yr).
Effluent and surface water discharge	Discharge of surface water and effluent to sewer via an interceptor	From collection of surface water, waste-water from oil recycling and container wash waters, to discharge off-site	No change

There are no mining waste operations or groundwater activities undertaken at the installation.

Table 1a Types of Activities at the Knowsley Waste Facility; Mulberry Waste Limited

Schedule 1 / Activity Reference	Description	Capacity	Annex I and II Codes	Hazardous Waste Capacity	Non-Hazardous Waste Capacity
Activity 1: S. 5.3 A(1) (a)(ii)	The disposal or recovery of hazardous waste > 10 T / day by physico-chemical treatment – Mercury retort	Maximum capacity of 1.36 T / batch or day Annual capacity shall not exceed 500 T	R4: Recycling / reclamation of metals and metal compounds	1.36 tonnes / day processing Up to 140 tonnes / day storage	
Activity 2: S. 5.3 A(1) (a)(ii) Current A1	The disposal or recovery of hazardous waste > 10 T / day by physico-chemical treatment – crushing or shredding	Combined total of all waste accepted shall not exceed 210,000 T / yr	R3: Recycling / reclamation of organic substances which are not used as solvents (including composting and other biological transformation processes) R4: Recycling / reclamation of metals and metal compounds R5 Recycling / reclamation of other inorganic compounds	Physical processing capacities: Multec = 46 tonnes / day Shredder = 120 tonnes / day Maximum annual throughput limited to 8,755 tonnes	
Activity 3: S. 5.3 A(1) (a)(ii)	The disposal or recovery of hazardous waste > 10 T / day by physico-chemical treatment – float : sink tank	Combined total of all waste accepted shall not exceed 210,000 T / yr	R4: Recycling / reclamation of metals and metal compounds R5 Recycling / reclamation of other inorganic compounds R13: storage of waste pending any R1 – R12 operation D15: Storage pending off-site disposal	Processing capacity may exceed 10 tonnes per day Maximum annual throughput limited to 8,755 tonnes	

Schedule 1 / Activity Reference	Description	Capacity	Annex I and II Codes	Hazardous Waste Capacity	Non-Hazardous Waste Capacity
Activity 4: S. 5.3 A(1) (a)(iv) Current A2	The disposal or recovery of hazardous waste > 10 T / day involving repackaging – including sorting, separation and bulking	Combined total of all waste accepted shall not exceed 210,000 T / yr	R12: Exchange of wastes for submission to any of the operation numbered R1 – R11 R13: storage of waste pending any R1 – R12 operation D14: Repackaging prior to submission to any operations numbered D1 to D13 D15: Storage pending off-site disposal	12,730 tonnes per annum Maximum annual throughput	
Activity 5: S. 5.6 A(1) (a) Current A3	The temporary storage of hazardous waste with a capacity exceeding 50 T	Maximum quantity of oil and oily water shall not exceed 25 T Maximum quantity of hazardous waste stored pending recovery shall not exceed 575 T Combined total of all waste accepted shall not exceed 210,000 T / yr	R13: storage of waste pending any R1 – R12 operation D15: Storage pending off-site disposal	575 tonnes Within the overall site total (575 T)	
Activity 6: Manual and mechanical sorting, separation and repackaging of non-hazardous wastes Current A6	Manual and mechanical sorting and repackaging	Maximum quantity of waste that can be treated in any one day is 40 T Combined total of all waste accepted shall not exceed 210,000 T / yr	R3: Recycling / reclamation of organic substances which are not used as solvents (including composting and other biological transformation processes) R4: Recycling / reclamation of metals and metal compounds R13: storage of waste pending any R1 – R12 operation D15: Storage pending off-site disposal		575 tonnes Within the overall site total (575 T)

Schedule 1 / Activity Reference	Description	Capacity	Annex I and II Codes	Hazardous Waste Capacity	Non-Hazardous Waste Capacity
Activity 7: Shredding of metal waste including WEEE and ELVs and their components for recovery <i>Current A7</i>	Shredding	Maximum quantity of waste that can be treated in any one day is 120 T Combined total of all waste accepted shall not exceed 210,000 T / yr	R3: Recycling / reclamation of organic substances which are not used as solvents (including composting and other biological transformation processes) R4: Recycling / reclamation of metals and metal compounds R13: storage of waste pending any R1 – R12 operation		Physical processing capacity = 120 tonnes / day Maximum daily throughput limited to 74.99 tonnes
Activity 8: Non-hazardous waste storage <i>Current A8</i>	Storage	Combined total of all waste accepted shall not exceed 210,000 T / yr	R13: storage of waste pending any R1 – R12 operation D15: Storage pending off-site disposal		575 tonnes Within the overall site total (575 T)
Directly Associated Activities		Description and Application			
Activity 9: Utilities and services <i>Current A4</i>	Incoming mains water and energy supplies, and the use of a 275 kVa diesel fired generator providing energy to the Multec and shredder plant as required				
Activity 10: Effluent discharge <i>Current A5</i>	As per the terms of the Trade Effluent Consent Receipt of potentially oily effluent and run-off from all site processes				
Total Storage Capacity (T)		575 tonnes			
Annual Throughput (T / annum)		210,000 tonnes per annum			

Important Note:

Site storage is specified (and marked on the site plans) as likely capacities based on the current market availability and future estimates. However, in reality, any area of the site can be used to store any waste, subject to the availability of suitable infrastructure. That is, for example, WEEE waste will always be stored within a building or protected from the elements and aerosols will always be stored securely either within a cage, or in a vented waste safe. The overall storage capacity and annual throughput will remain within the maximum values stated above, although any one or combination of waste types may make up the total storage of the site at any one time.