



ENVIRONMENTAL SERVICES LTD

Non-Technical Summary

TONY BROWN AGGREGATES LTD

Diamond Yard
Pennington Lane
Lindal In Furness
Cumbria
LA12 0LA

EPR_LB3836AR_V002



BASIS OF REPORT

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1.0 Introduction

Tony Brown Aggregates Ltd (TBA) has instructed Probe Environmental Services Limited (Probe) to prepare an application for a normal variation of their current Environmental Permit under the Environmental Permitting (England and Wales) Regulations 2016.

The application is to vary the permit from Standard Rules SR2010 No12 to a bespoke permit to add the washing treatment activity to the current treatment of aggregate waste on site. This was upon advice given by local Environment Officers during an inspection in March this year.

The Operator also wishes to add extra waste codes and increase the tonnage to 150,000 tonnes per year.

On the 23rd November 2020 a further request by the operator was made to expand the current permitted area as part of the determination process. In response this ERA has been updated to reflect the proposed change.

Pre application advice was requested in May where it was recommended that the application would be a normal variation and gave advice and guidance relating to the appropriate documentation required. This document is included in Section 7 of this application.

This non-technical summary provides a summary of the regulated facility, an explanation of exactly what is being applied for, and a summary of the key technical standards and control measures that will be implemented at the site as a result of the proposed changes.

1.1 The Site

The site is located at;

Diamond Yard,
 Pennington Lane,
 Lindal In Furness,
 Cumbria, LA12 0LA

The National Grid Reference is approximately SD2553376241.

The site is principally bounded as detailed in Table 1.

Table 1

Boundary	Description
North	Rural / Agricultural
East	Rural / Agricultural
South	Rural / Agricultural
West	Rural / Agricultural

The site location and environmental site setting is shown on Drawing 001.

1.2 Current Environmental Permit

Waste operations at the site are currently covered under a Standard Rules environmental permit SR2010 No12 Treatment of waste to produce soil, soil substitutes and aggregate.

The following activities are currently authorised on site:

- R13: Storage of wastes pending the operations numbered R3 and R5
- R3: recycling or reclamation of organic substances which are not used as solvents
- R5: Recycling or reclamation of other inorganic materials

In undertaking these activities, the site is limited to;

- Treatment of wastes listed in table 2.3 consisting only of sorting, separation, screening, crushing and blending of waste for recovery as a soil, soil substitute or aggregate.
- Secure storage of wastes listed in table 2.3 pending treatment.
- Storage of wastes listed in table 2.4 shall not exceed 10,000 tonnes in total at any one time.
- All other wastes stored shall not exceed 40,000 tonnes in total at any one time.
- No more than 75,000 tonnes of waste shall be treated per year.
- Treatment of slags and ashes for disposal shall not exceed 50 tonnes per day, or if for a mix of recovery and disposal shall not exceed 75 tonnes per day.

1.3 Changes to tonnages, waste activities and waste types

The application seeks to add the washing activity to the aggregate production process.

The application seeks to increase the permitted area.

The application seeks to increase the site tonnage to 150,000 tonnes per annum.

The application seeks to add eight waste codes to the existing permitted waste list.

- 19 12 12 other wastes (including mixtures of materials) from mechanical treatment of wastes other than those mentioned in 19 12 11 MN – **specifying soils/aggregates only**

The above waste code relates to the soils and aggregates accepted from other local waste sites where they do not have the capacity or tonnage to further recycle aggregate waste and transfer the waste to the site. This would be undertaken after sampling or pre acceptance checks by Tony Brown Aggregates to assess suitability before acceptance to site.

- 01 05 04 freshwater drilling muds and wastes
- 02 01 01 sludges from washing and cleaning
- 19 13 02 solid wastes from soil remediation other than those mentioned in 19 13 01 MN
- 19 13 04 sludges from soil remediation other than those mentioned in
- 19 13 06 sludges from groundwater remediation other than those mentioned in 19 13 05 MN
- 19 13 08 aqueous liquid wastes and aqueous concentrates from groundwater remediation other than those mentioned in 19 13 07 MN
- 20 02 02 soil and stones

2.0 Application Contents

In view of the foregoing, the application comprises the following elements:

1. Application forms;
2. Drawings: 001 Site location, 002 Permitted Area , 005 Proposed Permitted Area, 004 Receptor Plan.
3. Non-Technical Summary (NTS).
4. Management System Summary (EMS);
5. Environmental Risk Assessment (ERA);
6. Dust Management Plan (DEMP);
7. Noise Management Plan (NMP)
8. Noise Impact Assessment (NIA);
9. WAMITAB;
10. Pre Application Document;
11. Directors Information and;
12. Key Operational Procedures (OT);

2.1 Application Forms

The Environment Agency's application forms Part A, C0.5, C2, C4 and F1 have been produced for the application.

2.2 Drawings

Drawing 001	Site Location Plan
Drawing 002	Permit Boundary

2.3 Non-Technical Summary

As part of the application this non-technical summary (NTS) is a concise document that provides a description of the application process should also provide an effective outline of all the key points set out in an Environmental Statement.

This Environmental Risk Assessment is included as Section 3 of the application.

2.4 Environmental Management System

TBA operate their own in-house management system which ensures that:

- The risks that the activities pose to the environment are identified;
- The measures that are required to minimise the risks are identified;
- The activities are managed in accordance with the management system;
- Performance against the management system is audited at regular intervals; and

- The Environmental Permit is complied with.

A summary of the management system is included within the application included as Section 4 of the application and a summary of the key technical standards for the management of the recycling facility is included in Section 4.0 of this non-technical summary.

The EMS also contains a site specific Dust and Emissions Plan, Noise Management Plan and a WRAP (Quality Protocol).

A summary of the EMS has been provided in Section 4 of this application and an Operating Techniques document has been produced included in Section 12.

2.5 Environmental Risk Assessment

An Environmental Risk Assessment (ERA) has been undertaken and submitted with the permit application to assess and mitigate risks associated with the proposed changes on the site. There will be no point source emissions to groundwater, surface water or air resulting from the waste activity and neither will there be any site waste arising or global warming potential.

Therefore only 'Amenity and Accidents' remains applicable for assessment in this instance, and includes the consideration of odour, noise and vibration, fugitive emissions (including dust, mud, litter and pests) and accidents.

The ERA concludes that with the implementation of risk management measures, as described in the ERA, potential hazards from the facility are unlikely to be significant.

The Environmental Risk Assessment is included in Section 5 of the application.

2.6 Dust and Emissions Management Plan

As per the pre application required a Dust Management Plan has been requested as part of the application.

2.7 Noise Management Plan

As per the pre application required a Noise Management Plan has been requested as part of the application.

2.8 Noise Impact Assessment

As per the pre application required a Noise Impact Assessment has been requested as part of the application.

2.9 Wamitab

Operations at the site will be under the overall control of a technically competent person who holds the relevant Certificate of Technical Competence (COTC) under the Waste Management Industry Training and Advisory Board (WAMITAB) scheme.

Mr Anthony Brown is the COTC for the site.

Both Mrs Dawn Brown and Faith Brown have also undertook their EPOC to ensure competence onsite.

Evidence of competence is supplied within the application in Section 9.

2.10 Pre-Application Information

Pre application information has been included in Section 10 of this application.

Upon initial submission in September 2019 a further request for a Noise Management Plan, a Noise Impact Assessment and Dust Management Plan has been requested.

Upon the determination point (22nd November 2020) updates have been made to all documentation to reflect the additional permitted area and proposed activities.

2.11 Directors Information

Directors information supplied in Section 11 of this application

3.0 Key Technical Standards

The key technical standards which will be employed to ensure that the proposed activities do not give rise to a significant environmental impact are summarised below:

- The Environmental Permitting (England and Wales) Regulations 2016;
- Develop a management system: environmental permits, February 2016;
- Control and monitor emissions for your environmental permit, February 2016;
- Risk assessments for your environmental permit, February 2016; and
- Sector Guidance Note S5.06: recovery and disposal of hazardous and non-hazardous waste, May 2013.

In summary, the rules and operating procedures employed at the site will ensure that:

- All waste is managed in accordance with the Environmental Permit and legal requirements;
- The management and prevention of fires on site will be controlled via onsite fire procedures;
- The storage and treatment of waste is undertaken on impermeable surfacing with sealed drainage;
- Any tanks or containers used for the storage of any liquid fuel oil or other potentially polluting liquids/materials shall at all times be labelled as to the contents, and will be fit for purpose;
- Vehicles and plant will be appropriately maintained to ensure that operation will not give rise to unacceptable noise or vibration levels; and
- The risk of fugitive emissions (dust, noise, odour, pest and litter) is minimised;

Procedures are in place for the regular inspection and maintenance of storage areas and associated infrastructure, including site surfacing, drainage systems and containment measures.

Records will be maintained detailing any action taken to repair infrastructure and faults.

An Accident Management Plan is maintained and regularly reviewed to assess and minimise environmental risks and hazards of accidents and their consequences.

The operating Techniques document covers site activities and controls (OT) in Section 12.

4.0 Conclusion

The overall conclusion from the studies undertaken in support of the permit application is that there is unlikely to be a significant environmental impact upon potentially sensitive receptors as a result of the proposed Environmental Permit application.

Tony Brown Aggregates Ltd is fully committed to ensuring the highest standards are met and will undertake its activities in a manner consistent with best industrial practices and with the implementation of the company's management system.



