



## HEYSHAM HAZARDOUS WASTE TRANSFER STATION

# NOT DULY MADE RESPONSE

EPR PERMIT APPLICATION EPR/QP3631QX/A001

### 1 WASTE CHARACTERISATION

The primary waste being brought onto site is oils from garages/vehicle workshops, namely *EWC 13 02 05\* - mineral-based non-chlorinated engine, gear and lubricating oils*. This waste type is stored in the large tanks on site.

GED also accept other garage wastes, such as oil filters, oily rags, batteries, and garage packaging wastes. The full list of EWC codes accepted on site is included in table 2.2 of the application support document. These waste types are not collected often, and are only accepted when pre-booked into GED's facility, ensuring there is sufficient storage capacity for incoming wastes. Collection of waste types listed in the application support document (not including 13 02 05\*) is provided by GED to clients as a 'whole service' offering to garages.

As per EA guidance "*Chemical waste: appropriate measures for permitted facilities*", under the "*Sorting, repackaging, and bulking*" subheading, the activities on site constitute sorting and bulking only. The pertinent points for the activities on site are:

*80. Bulking of waste that is not regarded as repackaging includes:*

- *discharging from a tanker to bulk storage of wastes of the same type*
- *tank to tank transfer where both tanks contain wastes of the same type*

*81. You must only bulk or repackage wastes together if they are materially the same. They must not react when they are bulked and they must not change the waste's composition.*

*82. If a waste is mixed with other similar wastes, where the resulting mixture does not have significantly different characteristics from the mixed wastes (for example blending compatible combustible or flammable wastes as a fuel), this activity is mixing or blending (coded D13 or R12). Any **other** mixing that changes a waste is treatment.*

As described in points 80 – 82 of this guidance, waste types are not mixed on site and therefore is not designated as 'treatment'. The only processing is the bulking of wastes before transfer off-site for disposal or recovery elsewhere, such as a local refinery for waste oils or a local MRF or transfer station for packaging wastes.



Up to 589t total of waste may be on site at any one time, but in reality this is highly unlikely to be reached. The 5,200t per year for non-oily waste accounts for up 250 “loads” (250 x 26 IBCs at 20.8t per load) but again in reality this is highly unlikely to be reached.

The breakdown of this 589t is summarised in the following sections.

## 2 STORAGE TANK AREA

As described above, wastes are only bulked/sorted with other wastes of the same type. Liquid wastes are stored in one of the large tanks on site within the bunded area, or in IBCs in the waste storage area. The waste storage area is the only other area on site where wastes are stored.

Waste oil designated as 13 02 05\* is stored in tanks 1, 3, and 6 – 9. Tank 4 is for storage of antifreeze (EWC 16 01 14\*), tank 5 is for storage of diesel, and tank 2 is designated as a ‘flexible tank’.

Any incoming waste oil/lubricant or liquid that is not included in the above, will be stored in tank 2. Wastes of these types will only be stored in tank 2 if the tank is empty, or the waste already stored in the tank is the same waste type. This ensures no mixing of wastes and is ensured by the pre-booking system and pre-acceptance and acceptance procedures.

See table 1 below for tank capacities, and waste types to be stored.

**Table 1. Storage tanks, capacities, and waste types**

Tank	Capacity (l)	Material	Waste type
Tank 1	95,000	vertical steel tank	Waste oil – 13 02 05*
Tank 2	95,000	vertical steel tank	Any liquid waste in accepted waste list. Only 1 waste type at any one time.
Tank 3	47,000	vertical steel tank	Waste oil – 13 02 05*
Tank 4	47,000	vertical steel tank	Antifreeze – 16 01 14*
Tank 5	13,000	horizontal self-bunded polyethylene tank	Diesel – 13 07 01*
Tank 6	70,000	square steel tank	Waste oil – 13 02 05*
Tank 7	60,000	vertical steel tank	Waste oil – 13 02 05*
Tank 8	60,000	vertical steel tank	Waste oil – 13 02 05*
Tank 9	60,000	vertical steel tank	Waste oil – 13 02 05*
<b>Total</b>	<b>547,000 (547m<sup>3</sup>)</b>		

As described in the application support document, all tanks are installed with secondary containment and designed to comply with the following standards and guidance requirements;

- Oil storage regulations for businesses, Environment Agency, 2015;
- Oil Storage Regulations Guidance, Environment Agency and Defra 2016;



- CIRIA C598: Chemical Storage Tank Systems – Good Practice; and
- CIRIA C736: Design of Containment Systems for the Prevention of Pollution.

Please note, there is a typo in the application support document saying the bund surrounding the tanks has a capacity for 24,779 litres. This should read as 247,779 litres, ensuring the capacity is significantly greater than both 25% of the total tank capacity and over 110% of the largest tank within the bund.

### 3 WASTE STORAGE AREA

All other wastes entering the site are stored in the waste storage area. The only waste types with designated storage areas within the waste storage area are:

- 13 02 05\* - mineral-based non-chlorinated engine, gear and lubricating oils
- 15 02 02\* - absorbents, filter materials (including oil filters not otherwise specified), wiping cloths and protective clothing contaminated by hazardous substances
- 16 01 07\* - oil filters
- 16 01 14\* - antifreeze fluids containing hazardous substances

All other wastes are stored in any of the 3 ‘flexible’ storage areas. Similar to arrangements for tank 2, wastes of these types will only be stored in an empty ‘flexible’ area, or if the waste already stored in that area is the same waste type. This ensures no mixing of wastes and is ensured by the pre-booking system and pre-acceptance and acceptance procedures.

In terms of containers, almost all incoming waste is in drums and IBCs, and stored in their marked areas on the site plan, and any other wastes are stored in the ‘flexible’ storage areas. The site does not usually bring in non-hazardous waste other than oil filters and rags, therefore it is unlikely that more than 3 of the other EWC waste types are on site any one time. In the unlikely scenario there are no available areas for incoming wastes then these will not be accepted on site and diverted elsewhere.

Waste within IBC’s is stored within labelled rows externally in the Storage Yard. IBCs are stacked no higher than 2 high and 2 wide and there will be sufficient space between rows for access via forklift. Drums shall be stored within the covered drum storage area or external yard, 4 to a pallet and stacked no higher than 2 high.

Incoming waste batteries are stored in battery boxes, and gas bottles are stored in cages. Again, these are only accepted on site and stored in one of the flexible storage areas if there is sufficient capacity to do so.

These measures ensure no mixing of wastes occurs on site, minimising any risk of reactions between wastes.

Up to 26 IBCs of the ‘designated’ wastes (filters, rags, antifreeze, waste oil) are stored on site at any one time (this constitutes one load of waste to leave the site). Another 26 IBCs can be stored in the ‘flexible’ bays at any one time before being transferred off site for recovery/disposal elsewhere. An IBC can hold up to approximately 800kg (heaviest waste), therefore up to 42t total at any one time. Battery boxes or gas



bottles will use capacity for IBCs in the flexible storage areas, but these will not affect the overall tonnage due to the expected volumes of these waste types that are typically stored on site.

#### **4 MONITORING**

Part of the EA concern around the application so far is that the application does not recognise the activities on site as a treatment. As discussed in section 1 of this document this is correct as per the EA's chemical waste guidance.

Another concern is that the tank vents are not recognised as point source emissions. The tanks on site are vented in accordance with the EA Chemical waste guidance and all other storage containers are sealed and only opened to fill with incoming material, minimising fugitive emissions as far as possible.

As the activities on site do not constitute treatment, a number of the BAT requirements in this sector do not apply, and the chemical waste guidance does not include monitoring limits for bulk storage tanks. Therefore it is difficult to determine any emission limits that would apply to the tank vents.

GED are prepared to hire or buy VOC alarms for each of the tank vents if necessary, but the nature of the waste activities on site do not highlight any further monitoring requirements.

#### **5 SITE PLAN**

As discussed on the phone, the washdown area is for the washing of vehicles only. There is no washing of drums or containers on site.

#### **6 FIRE PREVENTION PLAN**

The FPP has been updated and appended to this response document, addressing the concerns raised during not-duly made discussions.