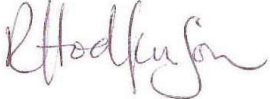


# **EP Variation Application**

## **Appendix A: Non-Technical Summary**

### **Leeds Aggregate Manufacturing Facility (EPR/TP3737YG/A006)**

OCO\_2023.01.02 - May 2023

<b>Project details</b>	Environmental Permit Variation Application – EPR TP3737YG/A006 O.C.O Technology Limited – Leeds Aggregate Manufacturing Facility
<b>Applicant details</b>	O.C.O Technology Limited Leeds Aggregate Manufacturing Facility Hub 45 37 Knowsthorpe Gate Leeds LS9 0NX
<b>Report details</b>	<b>Installation EP Variation Application</b> <b>Appendix A: Non-Technical Summary</b> <b>Document reference: OCO_2023.01/02_v1</b>
<b>Report date</b>	25 May 2023
<b>Submitted to</b>	Permitting and Support Centre Environmental Permitting Team Environment Agency Quadrant 2 99 Parkway Avenue Parkway Business Park Sheffield S9 4WF Email: PSC@environment-agency.gov.uk
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## Table of Contents

### Contents

1	Introduction .....	3
1.1	General.....	3
1.2	Current Site Status .....	3
1.3	Application Objective.....	4
2	Application Content .....	4
3	Impact of Changes.....	4

## 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) variation application, for its aggregate manufacturing facility at Hub45, Knowsthorpe Gate, Leeds, LS9 0NX.

The facility treats air pollution control (APC) residues to create an aggregate that can be used in block manufacture. This is carried out in three production lines which can operate in parallel. 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 curing bays then are moved to storage bays outside the permitted area where they remain pending collections by customers. Processing is all carried out in a building.

### 1.2 Current Site Status

The facility is currently authorised by EP ref. EPR/TP3737YG which was originally granted in March 2018. The EP history is shown in Table SS1.

**Table SS1: Permit History**

Description	Date	Details
Original Permit EPR/TP3737YG	02/03/2018	Permit issued to Carbon8 Aggregates Limited
Variation EPR/TP3737YG/V002	29/03/2019	Variation to increase the annual throughput – consolidated permit issued
Variation EPR/TP3737YG/V003	N/A	Application returned – resubmitted as A004
Variation EPR/TP3737YG/V004	10/12/2020	Variation to permit additional waste types following successful trial. EP issued in the name of O.C.O Technology Limited
Variation EPR/TP3737YG/V004	17/03/2021	Variation to permit the addition of the third duplicate processing line

The current EP allows the following activities to be carried out at the facility:

- 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 applies three times (AR1, AR2 and AR3) to reflect the three production lines and allows the applicant to treat certain hazardous wastes for the purposes of producing pellets; and
- 5.6 A(1)(a) – Temporary storage of hazardous waste with a total capacity exceeding 50 tonnes (R13). The maximum storage capacity is given as 2,375 tonnes, and a maximum storage time of 6 months is enforced, from the date of receipt of the waste. This is listed activity AR4.

Five directly associated activities (DAAs) are included as follows:

- AR5: Management of processed materials – the handling and storage of screened and treated materials produced by activities AR1 – AR3;
- AR6: Storage of raw materials for use within production lines AR1 – AR3;
- AR7: Handling and storage of wastes, prior to treatment and recovery activities for non-hazardous wastes;

- AR8: Management of surface water for reuse – surface water collection and storage from areas serving AR4; and
- AR9: Management of surface water for discharge to sewer – collection, storage, and discharge of clean, uncontaminated run-off from the aggregate stock yard, screening area and clean areas around the silos.

### 1.3 Application Objective

The applicant wishes to increase the permitted limit for throughput of waste in the three treatment lines. The current permit allows the treatment of up to 90,000 tonnes of hazardous waste per year.

The application seeks to increase this limit to 120,000 tonnes based on the following:

- Efficiencies that have resulted from the past 5 years of operations and fine tuning of the treatment process during that period; and
- Reduction in down-time of the treatment lines, resulting in fine tuning and optimisation of maintenance programmes.

As a result of these two primary factors, the facility can treat a larger volume of waste that was originally anticipated. The increase will essentially allow an increase in throughput across all three lines, over increasingly prolonged periods due to reduced shutdown (non-operational) periods.

What does, however, remain unchanged by the proposed increase in throughput is any of the existing related infrastructure or indeed the EP boundary. Whilst the quantity of waste processed, and therefore also the quantity of raw materials needed, will increase, the quantity of waste stored on site at any one time does not need to be increased; nor does the quantity of filler, binder, or CO<sub>2</sub>. Existing storage provision for these remains as per the current EP.

The increase in waste throughput and raw material use is considered to result in only one change and that is the number of deliveries made to the site.

## 2 Application Content

A variation application has been made to the EA to cover the proposed amendments to the existing permit. The application comprises the following documents, in accordance with the EP Regulations and sector guidance notes:

- EP Application Form – Parts A, C2, C3 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; and
- An environmental risk assessment addendum (Appendix B). This is based on the existing (approved) qualitative assessment and assesses the proposed changes, using the same source-pathway-receptor approach.

## 3 Impact of Changes

The applicant wishes to increase the permitted limit for throughput of waste in the three treatment lines. The current permit allows the treatment of up to 90,000 tonnes of hazardous waste per year. This will increase to 120,000 tonnes per year. What does, however, remain unchanged by the proposed increase in throughput is any of the existing related infrastructure or indeed the EP

boundary. Whilst the quantity of waste processed, and therefore also the quantity of raw materials needed, will increase, the quantity of waste stored on site at any one time does not need to be increased; nor does the quantity of filler, binder, or CO<sub>2</sub>. Existing storage provision for these remains as per the current EP.

The increase in waste throughput and raw material use is considered to result in only one change and that is the number of deliveries made to the site. In accordance with the information that is being submitted in parallel for the associated planning application, and consistent with previous applications to increase APCr tonnages, we can confirm that there will be an additional 9 vehicle trips per day on average. This is 4.5 deliveries of APCr; a small increase and not considered to be a significant change.

The application does not seek to amend the permitted waste types or the type of raw materials, the EP boundary, any emission points, any infrastructure; nor does it affect the way in which the permitted process is undertaken. The existing EP allows the discharge of clean, uncontaminated surface water run-off to sewer, however there is no discharge consent for this. This is unaffected by the variation.

The increase of throughput of existing waste types, in the existing treatment plants, does not present any new sources, pathways or receptors, however a review of the existing ERA has been undertaken to confirm this. This confirms that there are no changes to the risk profiles (specifically the existing residual risk) identified in the original assessment.