

EP Variation Application

Supporting Statement

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

OCO_2023.01 - May 2023

Project details	Environmental Permit Variation Application – EPR TP3737YG/A006 O.C.O Technology Limited – Leeds Aggregate Manufacturing Facility
Applicant details	O.C.O Technology Limited Leeds Aggregate Manufacturing Facility Hub 45 37 Knowsthorpe Gate Leeds LS9 0NX
Report details	EP Variation Application – Supporting Statement Document reference: OCO_2023.01/01_v1
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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 Form.....	4
2.1	Form Part A	4
2.2	Form Part C2	5
2.2.1	Question 2a	5
2.2.2	Question 3.....	5
2.2.3	Question 4.....	5
2.2.4	Question 5.....	5
2.2.5	Question 6.....	5
2.3	Form Part C3	5
2.3.1	Question 1.....	5
2.3.2	Question 2.....	6
2.3.3	Question 3.....	6
2.4	Form Part F1.....	6

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 per year 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 CO₂. 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 Form

An application to vary a bespoke installation EP requires the completion of the EA application form parts A, C2, C3 and F1. As stated in the guidance notes for the form, details only need to be included in relation to the parts of the existing permit (and permitted activities) that will be affected by the variation application. Details have primarily been provided on the form.

This section provides additional supporting information and signposts to supplementary documents provided in support of the variation application. The application form is provided at the front of this EP variation application document.

2.1 Form Part A

Contact details for the agent and the applicant are provided in this part of the application form. In addition to the relevant persons required by Question 5c of the form, details are provided for the Directors as follows:

- Stephen John Greig (Director) – Date of Birth: [REDACTED]
- Stephen Brian Roscoe (Director) – Date of Birth: [REDACTED]
- Richard MacAndrew Skehens (Director) – Date of Birth: [REDACTED]
- Clayton Sinclair Sullivan-Webb (Director) – Date of Birth: [REDACTED]

- Paul James Barber (Director) – Date of Birth: [REDACTED]

2.2 Form Part C2

2.2.1 Question 2a

The application being made is considered to fall under the definition of a substantial variation, as the proposed increase is, itself, above the threshold of the listed activity.

It is noted that despite this classification, 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.

2.2.2 Question 3

Question 3 is required to be completed where the application seeks to add a waste installation or operation to an EP that has not previously had them. This is not applicable for this application and this section has therefore not been completed.

2.2.3 Question 4

Question 4 requires confirmation of the sewerage undertaker where a discharge is part of the activity being applied for. The existing EP allows the discharge of clean, uncontaminated surface water run-off to sewer, however there is no discharge consent for this. It is also unaffected by this variation.

2.2.4 Question 5

Question 5a requires site plans to be provided in support of the variation application where appropriate. The variation seeks only to allow an increase in throughput for the treatment lines. There are no changes to any of the infrastructure and the existing site plans therefore remain applicable.

Question 5c requires the provision of a non-technical summary. This has been produced and is provided in **Appendix A** of this application.

Question 5d requires the submission of a fire prevention plan if the facility includes the storage of combustible waste. This is not applicable to this application; the waste accepted at the site is a product of a thermal treatment so is not itself combustible. No new waste types or process changes apply to this variation.

2.2.5 Question 6

Question 6 requires the provision of an environmental risk assessment (ERA).

There is an existing qualitative assessment in place at the site for the current activities and it follows the EA's source-pathway-receptor model (ref. OCO 2020.22/03_v1 Appendix E, dated 26 June 2020). It was written for the variation application to add the third duplicate processing line.

The purpose of this variation application is simply to increase the throughput of existing waste types, in the existing treatment plants and it is confirmed that this does not present any new sources, pathways or receptors, however a review of the existing ERA has been undertaken to confirm this.

A copy of the ERA addendum is provided in **Appendix B** of this variation application (ref. OCO_2023.01/03).

2.3 Form Part C3

2.3.1 Question 1

The purpose of this variation application is simply to increase the throughput of existing waste types, in the existing treatment plants.

The existing permit includes an annual processing limit of 90,000 tonnes per year. An increase from this to 120,000 tonnes per year is sought by the application.

2.3.2 Question 2

No new emissions are introduced by the variation.

2.3.3 Question 3

Question 3a relates to operating techniques. The techniques referred to in Table S1.2 of the permit remain relevant and applicable. The existing approved BAT assessment also remains relevant.

Question 3d relates to raw materials. The types of raw materials used as filler and binder are the same as those already permitted. Whilst the quantity used will increase proportionally with the increase in throughput, there will be no need to increase the storage capacity on site.

2.4 Form Part F1

The application fee has been identified using the 2022 EA Charging Scheme as follows:

- The increase in hazardous waste throughput is considered to constitute a substantial variation as the increase (30,000 tonnes per year) exceeds the listed activity threshold for treatment of hazardous waste of 10 tonnes per day. The substantial variation fee for the listed activity is cited in Table 1.16 under 1.16.1.5 and is £12,797.

Payment of the combined application fee of £12,797 has been made by BACS, reference BX23052572926284 dated 25 May 2023.

The application is being submitted along with a request for abatement of the charge relating to the increase in treatment capacity at the site. Whilst it is acknowledged that the EA will wish to assess any associated risks with this increase, it is also noted that the waste types are unchanged, as is the process and the existing infrastructure. A reduction in the fee is requested, to a level that better reflects the likely (or actual) effort required to assess this change.