

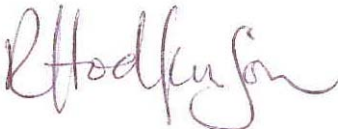
Project details	Environmental Permit Variation Application – EPR TP3737YG/A005 O.C.O Technology Limited – Leeds Facility
Applicant details	O.C.O Technology Limited Leeds Aggregate Manufacturing Facility Hub 45 Knowsthorpe Gate Leeds LS9 0NX
Report details	EP Variation Application – Supporting Statement Document reference: OCO_2020.22/01_v1
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Submitted to	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
Author	Rebecca Hodkinson EHS Consultant
Signature	



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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 Hub 45, 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 two 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 covered bays and transferred to an adjacent factory to make blocks. 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 1.

Table 1 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
Variation EPR/ TP3737YG/V003	N/A	Application returned – resubmitted as V004
Variation EPR/ TP3737YG/V004	Pending	Variation to permit additional waste types following successful trial. EP to be issued in the name of O.C.O Technology Limited

The current EP (V002) 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 twice (AR1 and AR2) to reflect the two production lines and allows the applicant to treat certain hazardous wastes (a maximum of 280 tonnes per day and annual throughput of <60,000 tonnes) for the purposes of producing pellets; and
- 5.6 A(1)(a) – Temporary storage (AR3) of hazardous waste with a total capacity exceeding 50 tonnes (R13). The maximum storage capacity is given as 1900 tonnes at any one time, and a maximum storage time of 6 months is enforced, from the date of receipt of the waste.

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

- Handling and storage of wastes, prior to treatment and recovery activities for hazardous wastes (AR4);
- Storage of raw materials (AR5) for use within production lines AR1 and AR2; and
- Management of surface water for re-use (AR6) and for discharge to sewer (AR7).

A copy of the current EP is provided in **Appendix A** of this variation application.

1.3 Application Objective

The applicant wishes to install a third treatment line at the site. The line will be an exact duplicate of the two existing treatment lines, will process the same permitted wastes, and will utilise the same permitted raw materials to produce the aggregate. It will be located to the north-west of the two existing production lines. It is proposed that the addition is addressed in the EP by way of the following changes:

- Inclusion of the third line as an additional listed activity under S5.3 Part A(1)(a)(vi) in Table S1.1. It is suggested that this is given activity reference AR2b to keep the references for the subsequent activities the same as they currently are;
- Increase of the daily treatment limit specified against AR1 and AR2 in Table S1.1, proportionally, from 280 tonnes per day over production lines 1 and 2 to 420 tonnes per day over production lines 1, 2 and 3;
- Increase of the total storage limit for hazardous waste specified against AR3 in Table S1.1. The current EP limits storage to 1,900 tonnes of waste at any one time. This is in 8 storage silos. The proposal includes the addition of 2 more storage silos, an increase of 25%. The storage limit is therefore to be increased to 2,375 tonnes. The additional storage silos would be located to the northwest of the existing silos and on an extension to the existing silo foundation pad;
- Increase of storage of binder/filler. This is currently in two silos in between the two sets of waste storage silos. An additional two silos are proposed to be installed, on an engineered pad, adjacent to the production building and existing CO₂ tank;
- Increase of CO₂ storage. There is currently a single CO₂ tank adjacent to the production building; a second would be added immediately to the southeast of this; and
- Inclusion of new emission points in Tables S3.1 for the dust vents on the two new waste silos (A13 and A14), and the two new binder/filler silos (A15 and A16).

It is also noted that the increased production capabilities will require the installation of two additional aggregate storage bays (product, not waste) to the south east of the site, next to the existing three bays.

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. A new listed activity is being added (a duplicate of two of the existing listed activities); this is reflected by the completion of Part C3. 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:

- John Stephen Greig (Managing Director) – Date of Birth: XXXXXXXXXX

- 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]

2.2 Form Part C2

2.2.1 Question 1a

O.C.O Technology submitted a request for pre-application advice from the Environment Agency (EA). A copy of the response, along with the conservation screening report, is provided in **Appendix B** of this application.

2.2.2 Question 2a

The application being made has been confirmed by the EA to fall under the definition of a substantial variation as it seeks to add a listed activity, even though this is a duplicate of the existing permitting listed activities for the treatment of waste under S5.3 Part A(1)(a)(vi). It is noted that despite this, the application does not seek to amend the permitted waste types, or the raw materials, nor does it affect the way in which the permitted process is undertaken.

2.2.3 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. The proposed listed activity is a duplicate of the 2 treatment activities already permitted; therefore this part of the form is not applicable and has not been completed. The EA already holds information pertaining to relevant offences, finances, COTC and the certified management system.

2.2.4 Question 4

Question 4 requires confirmation of the sewerage undertaker where a discharge is part of the activity being applied for. There is an existing discharge of surface water to public foul sewer, owned by Yorkshire Water, however the original EP application confirmed that no discharge consent is required for this. No change is effected by the addition of a third production line.

2.2.5 Question 5

Question 5a requires site plans to be provided in support of the variation application where appropriate. The application seeks to add a third production line and to increase the quantity of waste storage and raw material storage on the site. The site layout plan has been amended to reflect this, and also the amendments to the drainage gully locations. A copy of the updated plan is provided in **Appendix C** of this application.

Question 5b requires a site report to be produced for any extra land that is to be included in the EP. The EP boundary remains unchanged as a result of this application so no site report is required.

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

Question 5d requires the submission of a fire prevention plan as the facility includes the storage of combustible waste. This is not applicable to this application.

Question 5f requires the provision of a baseline report where the application is seeking to add an installation. A site condition report was produced for the original EP application in 2018. This variation does not seek to amend the EP boundary, nor does it introduce any new processes or materials. Based on this, the existing site condition report remains valid and applicable.

2.2.6 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. The purpose of this variation application is to add a third production line and it is confirmed that this does not present any new risks. The EA pre-application advice does note two local nature reserves/local wildlife sites within 2 km of the site, therefore the existing assessment has been updated to reflect these potentially sensitive receptors. A copy of the updated ERA is provided in **Appendix E** of this application.

2.3 Form Part C3

2.3.1 Question 1

The existing permit includes the operation of two production lines. The application is to add a third, duplicate, production line. It will process the same permitted wastes, and will utilise the same permitted raw materials to produce the aggregate. Table 1a has been completed to reflect the resulting total capacities once the third line has been added i.e. an increase in treatment capacity from 60,000 tonnes per year to 90,000 tonnes per year; an increase by 140 tonnes in the daily treatment capacity (from 280 tonnes across 2 lines to 420 across the 3 lines); and an increase in waste storage from 1900 tonnes in 8 silos, to 2375 tonnes in 10 silos. It is acknowledged that the increase in hazardous waste storage is greater than the associated listed activity threshold of 50 tonnes.

No new waste types are proposed, however it is noted that the EP should reflect the additional waste codes granted in the pending EP variation application V004 which is being determined in parallel with this application.

2.3.2 Question 2

The application seeks to add 2 new waste storage silos, 2 new binder/filler silos, 1 new CO₂ tank and a third production line. This results in the addition of new emission points as follows, for inclusion in Table S3.1:

- A13 and A14 – vents from the 2 additional waste storage silos
- A5 and A16 – vents from the 2 additional binder/filler silos

These new emission points are shown on the Site Layout Plan provided in **Appendix C** of this variation application.

2.3.3 Question 3

Question 3a relates to operating techniques. The techniques that would be applied to the operation of the third production line are unchanged from those already permitted, therefore the techniques referred to in Table S1.2 of the permit remain relevant and applicable. A copy of the BAT assessment submitted for the original application in 2018 is provided as **Appendix F** of this variation application.

Question 3d relates to raw materials. The types of raw materials used as filler and binder are the same as those already used but the quantity used will increase proportionally with the addition of the third line. Storage capacity is to be increased by the installation of 2 additional silos, the location of which is shown on the Site Layout Plan. The storage of CO₂ will be doubled, with a second identical tank being installed adjacent to the existing one.

2.3.4 Question 6

Question 6a requires information to be provided as to the basic measures implemented to improve energy efficiency. The measures outlined in the BAT Assessment for the original 2018 EP application remain applicable at the time of this variation, and to the proposed changes.

Question 6b requires a breakdown of any changes to energy use resulting from the application. As the application seeks to add a third, duplicate, production line, it is anticipated that energy use in relation to the actual production line will increase proportionally, however there will be other efficiencies such as no additional lighting required in the main building, the air compressor will not be subject to an increase in energy use, existing conveyors can manage the increase, and motors will not draw a proportional increase. Energy use is monitored at the site and reviewed on a regular basis in order to identify any inconsistencies and/or opportunities for improvement.

2.4 Form Part F1

The application fee has been identified using the April 2019 EA Charging Scheme and is made up of two charges.

The variation seeks to add a listed activity, albeit the same as already included in the EP. The substantial variation fee is 90% of the charge applicable to the listed activity; this is 1.16.1.5 and is £12,797.

The increase in hazardous waste storage sought by the application is also considered to constitute a substantial variation as the increase exceeds the listed activity threshold in its own right. The substantial variation fee is 90% of the charge applicable to the listed activity; this is 1.16.1.4 and is £12,167.

Payment of the combined application fee of £24,964 has been made by BACS, reference PSCAPPOCOTE733.

The application has been submitted along with a request for abatement of the charge relating to the increase in storage 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 types of wastes being stored are unchanged and the silos will be on a foundation pad located adjacent to the existing silos. A 90% reduction in this part of the fee is being requested, to a level that better reflects the effort required to assess this change.