

Nash Road Transfer Station

Environmental Permit Variation Application

Non-Technical Summary

SUEZ Recycling and Recovery UK Ltd

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Prepared on Behalf of Tetra Tech Environment Planning Transport Limited.
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TABLE OF CONTENTS

1.0	NON TECHINCAL SUMMARY	1
2.0	SUPPORTING INFORMATION.....	3

DRAWINGS

Environmental Permit Boundary - SUEZ/B033859/PER/01

Site Layout – Nsh-FPP-0822-01

Site Drainage Plan - Nsh-DRN-0822-01

Receptor Plan - SUEZ/B033859/REC/01

APPENDICES

Appendix A – Application Forms

Appendix B – Pre-Application Advice

Appendix C – Site Management Plan

Appendix D – Environmental Risk Assessment

Appendix E – Odour Management Plan

Appendix F – Fire Prevention Plan

Appendix G – Dust Management Plan

Appendix H – Noise Impact Assessment and Management Plan

Appendix I - Pest Management Plan

1.0 NON TECHNICAL SUMMARY

1.1 PERMIT APPLICATION

1.1.1 This Environmental Permit Variation Application has been prepared by Tetra Tech on behalf of the Operator, SUEZ Recycling and Recovery UK Ltd (SUEZ) under the requirements of the Environmental Permitting (England and Wales) Regulations as amended in 2016. It is a requirement of these Regulations that any application is accompanied by a Non-Technical Summary of the submitted documentation.

1.1.2 This application relates to SUEZ's permitted facility Nash Road (the site), Trafford Park, Greater Manchester, Lancashire, M17 1SX at approximate National Grid Reference (NGR) SJ 77737 97691. The site is currently regulated under a bespoke Environmental Permit (EPR/TP3405PT) that allows the operation of an IVC activity as a Schedule 1 activity and a number of directly associated activities (DAA) which includes the storage and physical treatment of waste that's destined for IVC. In addition to the environmental permit SUEZ have the following waste exemptions registered at the site.

Table 1: Registered Waste Exemptions

Registration Number	Exemption Number	Exemption Description
WEX226131	T4	Preparatory treatments, such as, baling, sorting, shredding.
WEX226132	T12	Manually treating waste
WEX230015	S2	Storing waste in a secure place

1.1.3 SUEZ are now seeking to vary the environmental permit to remove the IVC activity and allow the operation of a non-hazardous waste transfer activity. In addition, SUEZ propose the following changes: -

- Change the name of the facility from 'Trafford Park In-Vessel Composting' to 'Nash Road Transfer Station'.
- Increase the annual throughput of the site from 50,000 tonnes to 90,000 tonnes.
- Update the permitted waste types to facilitate the waste transfer activity.
- Remove the emission point to air (reference A1) and the monitoring requirements that are associated with it. This emission point is associated with the odour suppression system that's designed for the IVC activity. This system will not be required following the removal of the IVC activity.

- Remove the emission point to sewer (SW1) and the monitoring requirements that are associated with it. This emission point is associated with a trade effluent consent that was required to discharge wastewater derived from blowdown from the odour abatement system of the IVC activity. Following the removal of the IVC activity and odour suppression system, the trade effluent consent will not be required.

1.1.4 The site provides a facility for the storage and ‘bulking up’ of household, ‘black bag’ waste, food waste, green waste, fly tipped waste collected by Waste Collection Authorities (WCAs) plus residual waste from household waste recycling centres (HWRCs). There will be no mechanical treatment of waste on site. Treatment will only consist of manual sorting and separation.

1.1.5 As a result, this proposal will change the nature of the facility from an installations facility to a waste operation.

1.1.6 This application is accompanied by all relevant documentation, as required by the aforementioned Regulations, and in the format set out in the Environment Agency’s (EA) guidance documents. Details of the supporting documents are provided in the following section.

2.0 SUPPORTING INFORMATION

2.1 PRE-APPLICATION DISCUSSIONS

Part C2, Question 1a

- 2.1.1 A request for basic and enhanced pre-application advice (EPR/TP3405PT/V003) was requested from the EA for this application. Copies of the advice letters are provided as Appendix B of the Environmental Permit Application.

2.2 APPLICATION FORMS

- 2.2.1 As detailed in the basic pre-application advice letter, it was advised that application forms Part A, C2, C3, B2, B4 and F1 would be required as part of the proposed application. The forms are provided as Appendix A of this application.

2.3 TYPE OF VARIATION

Part C2 and B2, Question 2a and Part F1, Table 1

- 2.3.1 According to the basic pre-application advice letter, the EA have advised that the variation would comprise the following: -
- A minor technical variation to remove the IVC activity from the environmental permit; and,
 - Addition of waste transfer activity – as noted in the EA's Environmental Permitting Charging Scheme guidance, if an application involves the addition of an activity that is not authorised by the environmental permit, the charge is the permit application charge applicable to that activity.
- 2.3.2 In addition to the above, email correspondence from the EA dated 06/01/2022 confirms that both elements can be applied for under one variation application.

2.4 ABILITY AS AN OPERATOR

Part C2 and B2, Section 3

- 2.4.1 According to the guidance notes that accompany the Part C2 application form, all of Section 3 needs to be provided if the proposal involves the addition of a waste installation or waste operations to a permit that has not previously had them. As such, details regarding SUEZ's technical competence, relevant offences and

management systems are provided in an additional sheet titled 'Operator Ability' which is provided as part of Appendix A.

2.5 SITE CONDITION REPORT

Part C2 and B2, Question 5b

- 2.5.1 According to the guidance notes that accompany the Part C2 application form, a Site Condition Report (SCR) is only required if the proposal requires extra land to be included in the environmental permit. Although the proposal will result in changes to the site layout, SUEZ does not propose to make any changes to the site boundary. In addition, the basic pre-application advice letter indicates that the EA do not require a SCR to support this application. As such, a Site Condition Report has not been prepared to support this application.

2.6 SITE PLAN

Part C2 and B2, Question 5a

- 2.6.1 In accordance with the guidance notes provided in Part C2 application form, a site plan is required if the proposal involves any changes to the permitted area. As such, a site layout plan (Drawing Reference Nsh-FPP-0822-01) has been prepared which details the proposed site layout for the operation of the waste transfer station.

2.7 FIRE PREVENTION PLAN

Part C2 and B2, Questions 5d and 5e

- 2.7.1 According to the basic pre-application advice letter, a Fire Prevention Plan (Appendix F of the Environmental Permit Application) has been prepared in accordance with EA's guidance 'Fire Prevention Plans: Environmental Permits' updated in January 2021. The report identifies the potential causes and effects of a fire and describes the measures that will be in place to prevent occurrence of a fire at the site.

2.8 ENVIRONMENTAL RISK ASSESSMENT

Part C2 and B2, Question 6

- 2.8.1 According to the basic pre-application advice letter, an Environmental Risk Assessment (Appendix D) has been prepared to consider the potential impact of the proposed activity. The Environmental Risk Assessment (ERA) is concerned with the nature and extent of any linkages between the source of any

environmental hazards and the receptors which may be susceptible to harm; such linkages being termed pathways. Where potential for harm is identified, the assessment identifies the management techniques which will be utilised to mitigate such impacts.

2.9 WASTE OPERATIONS/ACTIVITIES SUBJECT TO VARIATION

Part C3 and B4, Question 1

2.9.1 As mentioned in Section 1, SUEZ are seeking to vary the environmental permit to remove the IVC activity and allow the operation of a non-hazardous waste transfer station. Details regarding the operation and management of the waste transfer activity are provided in the Site Management Plan (Appendix C of the Environmental Permit application).

2.10 GENERAL REQUIREMENTS

Part B4, Table 3b

2.10.1 In terms of dust, the EA's 'Control and monitor emissions for your environmental permit' guidance indicates that a dust management plan is required if a site is '*keeping or treating (or both) household, commercial or industrial waste in a waste transfer station*'. As such, a Dust Management Plan (Appendix G of the Environmental Permit Application) has been prepared to describe the measures that will be in place to prevent occurrence of dust from the proposed waste transfer activity.

2.10.2 In terms of odour, an Odour Management Plan (Appendix E of the Environmental Permit Application) has been prepared in accordance with the EA's Guidance Note 'H4 Odour Management'.

2.10.3 In terms of noise, a request for enhanced pre-application advice was submitted to the EA to confirm whether the proposal would require a Noise Impact Assessment (NIA) and a Noise Management Plan (NMP). In response, the EA confirmed that a NIA and NMP will be required and therefore both have been prepared accordingly. Both documents are provided as Appendix H of this Environmental Permit Application.

2.10.4 As detailed in the basic pre-application advice letter, it was advised that a Pest Management Plan would be required to support the proposed waste transfer activity. As such, a Pest Management Plan has been prepared and is provided as Appendix I of the Environmental Permit Application.

2.11 APPLICATION FEES

Part F1, Question 1

2.11.1 Based on the advice that was provided in the basic pre-application advice letter and the additional documents that have been prepared to support this application, it's considered that the application fee will comprise the following: -

Table 2: Summary of Application Fees

Activity Reference	Description	Application Type	Fee
1.16.2.1	Section 5.4 (b)(i) – Non-hazardous waste installation – biological treatment	Minor Variation – Removal of activity	£4,196
1.16.6	Household, commercial, and industrial waste transfer station; includes assessment of fire prevention plan and odour management plan	New – Addition of activity	£9,176
1.19.5	Emissions Management Plan	-	£1,241
1.19.7	Noise Management Plan	-	£1,246
1.19.4	Pest Management Plan	-	£1,241
Total			£17,100