

Reliance Street MTR, TLS and HWRC

Application to vary an Environmental Permit

Non-Technical Summary and Description of Proposals

1. Non-Technical Summary

1.1. Introduction

This Non-Technical Summary and description of proposals forms part of the application to vary the environmental permit for the Reliance Street (North Manchester) Resource Recovery Centre and Mechanical Biological Treatment Facility (the site).

The site is located at Reliance Street, Newton Heath, Manchester, M40 3EZ at National Grid Reference (NGR) SD 88141 01015. A site location plan and layout plans for the site are included as Figures 1, 2, 3 and 6 – EP5 Site Management System.

1.2. Background

The site is currently regulated under a bespoke installations permit EPR/HB3001GV which allows the operation of multiple activities including waste operations.

Full details of the site's activities are included in Section 1.3 – Description of Permitted Activities and proposed amendments are included in Section 1.4 – Description of Proposals.

1.3. Description of Permitted Activities

Mechanical and Biological Treatment (MBT) – Activity Reference A7

The permit currently allows the operation of a MBT facility with a maximum annual throughput of 130,000 tonnes per annum. This activity is based at the central section of the site (Figure 1).

The former MBT treatment process involved the mechanical pre-treatment of solid municipal waste by shredding to reduce the size of the material, followed by mechanical sorting to separate the material into different fractions suitable for biological treatment, recycling and thermal treatment.

Previously the organic fractions would proceed to biological treatment on site which involved a wet treatment process to prepare the material for treatment by Anaerobic Digestion (AD).

Any recyclable material recovered from the mechanical treatment process would be bulked and transferred off site for recovery and residual waste would be compacted into shipping containers and transferred off site by rail freight for thermal treatment. The shipping containers would be transferred via the railway line that runs along the southern section of the site (as shown in Figure 3).

In addition to the main MBT process, the current permit allows the acceptance and treatment of bulky waste as part of the MBT facility. Bulky waste would be treated by crushing and then the material would be transferred off site for further processing.

With reference to Table S1.1 of the environmental permit, the MBT facility is identified as a waste operation (activity reference A7).

Once the permit was transferred to SUEZ in 2019, all biological treatment activities on site ceased and there are no current plans for biological treatment activities in the future. As a result, the AD plant has been decommissioned and all parts of infrastructure have been removed from the site.

At present, only the mechanical treatment process from the former MBT that is operational and predominantly processes solid municipal waste and this is the current and future activity at the site, with no biological waste treatment. The key difference is that organic fractions are no longer separated as part of the treatment process.

The treatment process now involves shredding to reduce the size of the material for transport to reduce waste space within the rail containers. After shredding, the material is transferred to a conveyor system and then passes an overband magnet to recover ferrous metals from the shredded material for further recycling and recovery off site. The residual material is compacted into shipping containers and placed outside in the rail yard prior to transfer off site (via rail freight) to a permitted facility for thermal treatment. At present, the majority of the waste is transferred to the Runcorn Energy from Waste (EfW) facility.

Anaerobic Digestion - Activity References A2, A3 and Directly Associated Activities (DAA) A1, A4, A5, A6 and A10 – to be surrendered and removed from the permit as part of this variation.

As part of the former AD process, the current permit allows the operation of ancillary infrastructure including Combined Heat and Power (CHP) engines, regenerative thermal oxidiser (RTO) a biogas flare and a drying facility to process specific outputs that are generated from the AD.

The operation of ancillary infrastructure comprises separate Schedule 1 activities as well as the following directly associated activities (DAA):-

- Burning of waste as a fuel
- The use of combustible gases produced as a by-product of the AD process and natural gas as fuel
- The flaring of biogas
- The storage of biogas and gas compression
- Treatment of process water

As mentioned above, all biological treatment activities are no longer operational, all parts of the ancillary infrastructure have been removed from the site and these activities and can be removed from the permit.

Odour Control System for MBT

Prior to redevelopment, the MBT building contained an odour control system (OCS) which was installed as part of the original MBT process. The OCS was designed to allow the extraction of air from the pre-treatment area and feed into the waste tipping hall, for dilution purposes, before being extracted and either fed into a process air cleaning plant or used as process air within the thermal dryers to reduce the moisture content of the digestate. The process air was sent to a Regenerative Thermal Oxidiser (RTO). According to the permit, the RTO comprises an emission point to air (reference A3).

The RTO is no longer operational and has been removed, the odour abatement system within the MTR building involves air from the building being extracted at several locations by a ventilation system and treated by abatement plant which removes dust, particulate matter and odour through a carbon system and filters prior to discharge to atmosphere through a stack. These directly associated activities are also requested to be removed as part of this variation application.

Household Waste Recycling Centre – Activity Reference A8

The HWRC provides a facility for the acceptance, storage and transfer of non-hazardous and hazardous waste from members of the public. Wastes are delivered by members of the public and then deposited into the relevant labelled containers by the public. Some bulkier items may be moved or placed into containers by site staff.

The HWRC is based in a designated area at the northern section of the site (as shown on Figure 3) and is being redeveloped and the new access road requires a small extension to the permit boundary. Waste that are included in the exemption and regulatory position statements also need to be added to the permitted waste type list.

Transfer Loading Station (TLS) – Activity Reference A9

TLS Waste Exemption

According to the environmental permit, all waste for the MBT must be stored inside a building. In addition, the original waste management licence states that all waste for the TLS must be kept in a building or within a secure container.

At present, any waste accepted for treatment via the MBT facility is stored inside the designated MBT building. However, there are some waste streams that are stored outside to the west of the MBT building as shown on Figure 2. Such waste streams include the following:

- Fridges
- Freezers
- CRTs
- Fluorescent tubes

- Small mixed WEEE
- Large appliances
- Household chemicals
- Car batteries
- Plasterboard
- Asbestos
- Gas bottles
- Green waste
- Scrap metal
- Rubble
- Wood

These waste streams are not processed by the MBT facility and so they are solely bulked on site prior to transfer to an appropriate permitted facility. Some waste streams are stored in secure containers or cages and therefore are considered to be compliant with the conditions of the TLS activity.

Other waste streams are stored in accordance with an active S2 exemption such as green waste, scrap metal, rubble and wood which are stored in external bays adjacent to the MBT building. The latest registration (registration WEX440033) was done in March 2025 and due to expire in March 2028, or until the proposed changes to the waste exemptions regime are introduced.

In August 2023, SUEZ received correspondence from the Environment Agency (EA) regarding changes to the waste exemptions regime. As noted in the correspondence, there will be changes to the Environmental Permitting (England and Wales) Regulations which will prohibit the use of waste exemptions either on or next to a permitted site. If operators wish to continue their exempt waste activities, they must apply to vary their environmental permit within 6 months of changes to the regulations.

1.4. Summary Description of Proposals

This permit variation seeks to:

- 1. Remove/surrender all biological treatment activities from the MBT facility and maintain the existing mechanical treatment waste operation** – As mentioned above, all biological treatment activities at the MBT are no longer operational however, SUEZ are seeking to maintain the existing mechanical treatment process and therefore seek to change the name of the MBT to a 'Mechanical Treatment Recovery' (MTR). A new application charge has been included in the total fee to add/amend activity A7 to be physical treatment of non-hazardous waste activity.
- 2. Amend the permitted waste types for the MTR activity** – According to the current permit, Table S3.2 provides a list of permitted waste types for the MBT facility. This list includes waste streams that are typically accepted for biological treatment such as sludges. As part of the proposal to remove biological treatment activities from the environmental permit (as mentioned in Point 1), SUEZ are seeking to update the permitted waste types in Table S3.2 by removing any waste streams that are not deemed appropriate for the existing and ongoing MTR process.

3. **Maintain bulking and storage activities within the MTR building** – As mentioned in Section 1.3, some areas of the MTR building are used for the bulking and storage of specific waste streams including road sweepings and outputs from the MRF including ferrous cans and reject materials. These materials are not processed by the current MTR process. SUEZ are seeking to maintain this activity as part of this proposal and therefore would like to ensure that this is regularised in the environmental permit. Based on the nature of the process, it's considered that this activity is similar to a transfer station and therefore may form part of the permitted TLS activity.
4. **Remove/surrender all permitted waste installation activities relating to the AD (Activities A2, A3 and Directly Associated Activities (DAA) A1, A4, A5, A6 and A10)** – As mentioned above, all of these activities ceased in 2019 and the supporting infrastructure has been removed and therefore it is requested that all associated activities and conditions removed from the permit and the remaining activities renumbered accordingly.
5. **Remove emission points A1, A2, A3, A4 and A5** – As part of the proposal to remove the AD activity, SUEZ are seeking to remove all emission points from the permit.
6. **Regularise exempt waste activities into the TLS activity** - This relates to the external storage of waste which is authorised under the S2 waste exemption. With reference to Table 3.3 of the permit, the permit is missing some of the relevant waste codes that are stored outside as part of the S2 waste exemption. As such, it's considered that the following waste codes will need to be added to the TLS activity:
 - **16 02 11*** - Discarded equipment containing chlorofluorocarbons, HCFC, HFC
 - **16 02 13*** - Discarded equipment containing hazardous components other than those mentioned in 16 02 09 to 16 02 12
 - **16 06 01*** - Lead batteries
 - **16 06 02*** - Ni-Cd batteries
 - **16 06 03*** - Mercury-containing batteries
7. **Update the HWRC and add EWC codes** – According to the permit, Table 3.3 provides a single list of waste codes for the TLS and HWRC. Although the proposal involves the addition of waste codes to the TLS, SUEZ would like to ensure that waste code 16 06 01* can be accepted at the TLS and the HWRC. In addition, SUEZ are seeking to add the following waste codes as part of the HWRC:
 - **15 01 10*** - Packaging containing residues of or contaminated by dangerous substances
 - **15 01 11*** - Metallic packaging containing a hazardous solid porous matrix (for example asbestos), including empty pressure containers
 - **15 02 02*** - Absorbents, filter materials (including oil filters not otherwise specified), wiping cloths, protective clothing contaminated by dangerous substances
 - **20 01 99** - waste coffee pods (in RPS 282)

Waste code 15 01 10* will enable the acceptance of empty oil containers and waste code 15 01 11* will enable the acceptance of acetylene cylinders. Waste code 15 02 02* is a typical waste code that can be accepted in the relevant standard rules permits for HWRCs.

8. Extend HWRC Permit Boundary – SUEZ are seeking to extend the boundary slightly, to incorporate the new access road as part of this proposal.

9. Update the current 280,000 tonnes limit split – currently this is split in two between the MTR and the TLS/HWRC it is proposed that this is updated to the three current activities: MTR 180,000t TLS 70,000t and HWRC 30,000t.

10. Update the name of the facility on the permit to Reliance Street MTR, TLS and HWRC.

This application is accompanied by all relevant documentation, as required by the Environmental Permitting (England and Wales) 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. Application Documents

2.1. Type of Variation Part C2, Question 2a)

According to the pre-application advice provided in Section EP7, the EA advised that a substantial variation would be required would comprise the following:

- 2 x minor variations to surrender the Schedule 1 activities (references A2 and A3) in connection to the former AD installation activities and all directly associated activities.
- 1 x new application charge to change the MBT waste operation activity waste operation (A7), to a physical treatment of non-hazardous waste operation.
- 1 x normal variation of the TLS activity.
- 1 x normal variation of the HWRC activity to increase the permit boundary and update the waste type list.