2. Non-technical summary of the application

Application Form Part C2 Question 5c

2.1 Introduction

East Kent Recycling Limited (the applicant) operates an existing waste management facility at the site. It accepts solid, predominantly non-hazardous wastes typically arising from construction and demolition works, household clearance works and from some commercial and industrial sources. The wastes typically arrive as mixed loads in skips. The mixed wastes are sorted primarily by manual means, with limited mechanical assistance. After sorting into, for example, cable, metal, plasterboard, rubble, soil, wood, wastes are despatched from the site to be recycled into new products or recovered as energy from waste, elsewhere.

The applicant wishes to expand the EP site boundary and to install modern plant and equipment to enable more efficient sorting of incoming waste and to enable it to undertake specific waste treatment activities. The changes proposed will also enable the applicant to broaden its offer to the local waste and construction markets, including by enabling the acceptance of additional waste types and the supply of recycled aggregate and salvaged materials.

The existing Environmental Permit (EP) dates back to 1993 and has not been subject to a comprehensive update in the intervening period. The application therefore also seeks modern permit conditions.

2.2 Summary of the regulated activity

The regulated facility the subject of this variation application includes:

1) the receipt of various non-hazardous and limited hazardous solid waste streams;
2) the storage of waste pending sorting;
3) the manual and mechanical sorting of mixed wastes into separate fractions;
4) baling waste;
5) stockpiling of soils and hard materials for crushing and screening;
6) crushing and screening of demolition concrete and other hard materials using bucket attachments;
7) screening of soils using bucket attachments; and
8) the storage of waste pending despatch from site.

2.3 Environmental risk assessment

Odour

The activities present a low risk of odour nuisance.

Noise and vibration

Measures to reduce the potential for the waste management activities to cause noise annoyance include:

- restricting the operation of the site to between the hours of 07:00 to 18:00 Monday to Friday and 07:00 to 13:00 on Saturdays[3];

[3] In exceptional circumstances (e.g. to include for the receipt of Waste Collection Authority or Waste Disposal Authority waste and waste arising from civic amenity sites), activities involving the handling of waste at the facility will take place up to 17:00 on occasional Sundays. For full details see Table 3 below.

- monitoring and enforcing compliance with speed limit on the access road (20 mph) (applicant's own vehicles only) and within the site (5 mph);
- maintaining access road surface;
- planned preventative maintenance of applicant's own road vehicles and mobile plant;
- sheathing skip chains;
- enclosing areas for the reception, segregation, sorting, baling and storage of waste[4];
- enclosing elements of the MRF such as the waste reception point, functional parts, picking station and storage bays;
- placing skips fully onto vehicle backs before moving; and
- staff are instructed to keep noise to a minimum – loudspeakers are not allowed, vehicle horns are to only be used to warn of imminent danger.

On replacement and acquisition of mobile plant in the future, broadband reversing alarms will be specified.

Fugitive emissions to air

Measures to reduce the potential for the waste management activities to cause fugitive emissions of dust and litter include:

- all vehicles transporting potentially dusty waste will be sheeted or otherwise contained;
- the access road and site surface are of concrete and tarmac construction, it will be swept, including by using a road sweeper at least twice per week, this action will limit the escape of mud and debris beyond the site and assist in dampening down;
- speed limits will be imposed to prevent resuspension of dust;
- a mobile bowser will be stationed on site and used to dampen site surfaces;
- stored full skips will be stacked and / or sheeted;
- enclosing areas for the reception, segregation, sorting, baling and storage of waste (including the MRF waste reception point and picking station);
- the crusher bucket will be equipped with dust mitigation equipment;
- boundary mitigation sprays will be installed to the north-eastern and north-western perimeters of the site;
- stockpiles of incoming waste and processed materials in the north of the site will be profiled to prevent wind whipping;
- a hose will be used to dowse skips and stockpiles if necessary;
- all asbestos wastes received at the site will arrive either double-bagged / wrapped or in lockable containers for onward transfer and will be stored in secure, lockable containers. No asbestos waste will be opened or processed at the site;
- during loading of bulker trailers (note, waste will generally be loaded into the top of the trailer), minimum drop heights will be used. Wastes may also be dampened before loading. During very dry and windy weather, loading will be suspended if dust and / or litter cannot be controlled;
- daily inspections of the site and access road with litter picking as required; and

[4] Covered areas will include: (1) a new waste reception building covering the feed hopper of the MRF (or the "MRF reception building"); (2) the continued use of the existing covered tipping area; and (3) a new building for the storage of baled materials (the "bale store building").

- north eastern boundary (down prevailing wind) includes chain link fencing to more than 4.5m in height which should retain litter within the site and which will be cleared of litter daily.

Mud and debris

Measures to reduce the potential for mud and debris being deposited on the public highway include:

- vehicle access is carefully controlled;
- vehicle bodies and wheels are inspected for mud and debris and cleaned if necessary before leaving the site;
- the external yard and access road are swept by the road sweeper at least twice per week; and
- the access road is relatively long and in private ownership, the public highway is some 420m away.

Pests, vermin and insects

The potential for waste contained in skips and buildings or stored externally in stockpiles / storage bays to provide harbourage is managed by the rapid turnaround of waste through the site and the employment of specialist sub-contractors if required.

2.3.1 Accident risks

The following accident scenarios have been considered:

- flooding incidents;
- risk of harm to intruders;
- fire due to arson or plant malfunction for example; and
- fuel spills and releases of other potentially polluting liquids.

Flooding

The site is at risk of fluvial flooding. The applicant is in the process of developing a flood management plan focussing on clearing the site of waste and other potentially polluting substances in advance of flooding. The drainage system has been fitted with a shut off valve to prevent flood water backing up into the site.

Unauthorised access

- the boundary treatment comprises bunds, fencing and gates;
- the site is occupied 24 hours a day, 7 days a week, which assists in preventing unauthorised access, vandalism or arson or harm to intruders etc.; and
- CCTV is installed with alerts sent to the site manager in the event of movement in the site out of working hours.

Fire

- the site has a fire prevention and management plan;
- fire prevention actions include rapid turnaround of waste, planned preventative maintenance of plant and equipment, site layout to provide fire breaks and to keep ignition sources and combustible waste sufficiently separate, prevention of unauthorised access, and a no smoking policy[5]; and

[5] Smoking is only permitted in the area designated adjacent to the staff welfare facilities.

- fire management actions include, staff training, sufficient water quantity and pressure, and drainage system management actions.

The fire prevention and management plan submitted with this application addresses the current activities. It will be extended to address the future activities, the subject of this variation application, as part of the detailed design of the new buildings. A pre-operational condition is anticipated on any forthcoming varied EP requiring a revised fire prevention and management plan to be agreed with the EA prior to first use of the new buildings and plant and equipment.[6]

Fugitive emissions to ground / groundwater

Pollution prevention measures to reduce the likelihood of fugitive emissions to ground or groundwater include:

- waste acceptance and storage will either take place on the external concreted yard or undercover of buildings;
- waste is stored in skips for less than 48 hours;
- wastes to be stored and handled externally will not have significant potential to release pollution as they will be limited to inert wastes or non-hazardous soils; and
- the open yard surface is subject to routine inspection and maintenance to ensure its integrity.

Fuel and other oil spillages

- fuel and other non-water liquids are kept on site;
- relevant staff are trained in the correct handling of fuels and other non-water liquids to prevent spillages;
- a spill kit and drain dams are retained on site for use in the event of spillage during refuelling or for example should a hydraulic hose break etc.; and
- relevant staff receive emergency response training as to what to do in the event of a spill.

Leaching of contaminants from waste

- waste acceptance procedures seek to ensure that only permitted waste is accepted;
- all ground surfaces (including floor areas of existing and proposed buildings) comprise impermeable concrete and are maintained in good condition. This surfacing acts as a barrier between the site and the underlying ground and groundwater as well as reducing rainwater throughflow and subsequent migration of any contaminants;
- the covered waste reception areas and storage areas (namely the new MRF reception building, the bale store building and the existing covered tipping area) will further prevent leaching of contaminants by preventing the ingress of rain, thereby reducing the potential for rainwater to come into contact with any contaminated wastes before entering the surface water drainage system;
- bales of materials with a potential to release leachate will be stored undercover in the proposed bale store building;
- waste stored externally in stockpiles will have limited potential to release pollution / leachate; and
- waste contained in skips will be sorted within a few days of receipt and generally despatched within two weeks.

These measures serve to protect the underlying ground and groundwater.

[6] Email communication between Waterman and Environment Agency, February 2018.

2.4 Key technical standards and control measures to be adopted

The applicant has reviewed the existing and proposed control measures described above against relevant EA guidance and can confirm the requirements are met.

2.4.1 General management

The applicant has an in house Environmental Management System (EMS). The EMS assists in delivering the requirements of the EP (e.g. dust suppression and fire prevention). The EMS will be updated to reflect the scope of the variation application. The management system also specifies:

- waste storage times;
- maximum waste storage capacities;
- maximum waste storage heights; and
- a procedure to identify specific waste types stored at the facility.

2.4.2 Incidents and non-conformances

The management system enables:

- detection of abnormal operation, investigating the cause;
- decision making;
- recovery to normal operation;
- identification of proactive measures to prevent re-occurrence; and
- responding to complaints including through equipping the public and neighbours with relevant information.

2.4.3 Competent persons

Sufficient competent staff will continue to manage and operate the site.

2.4.4 Records

Records are kept in accordance with permit requirements.