

Environmental Permit

**Medway Recycling Centre, Malmaynes Hall Farm, Upper
Stoke, Rochester, Kent, ME3 9SG**

Variation Application

EPR/SP3401PP

Prepared by



Integrated Skills

For

OCL REGENERATION LIMITED

December 2022

[OCL-MRC-VAR-V1]



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1 INTRODUCTION

1.1 This report supports an application to vary an Environmental Permit on behalf of OCL Regeneration Limited (OCL) at their facility at:

Medway Recycling Centre
Malmaynes Hall Farm
Upper Stoke
Rochester
Kent
ME3 9SG

1.2 The Environmental Permit was issued on 24 March 2020.

1.3 OCL Regeneration specialise in sustainable building materials and recycled construction materials, serving the following sectors:

- Road construction and surfacing contractors
- Utility providers and contractors

1.4 Both groups generate the same waste materials through road and pavement construction or reinstatement following upgrades/repairs to underground services.

1.5 The company work to ISO14001 and 9001 compliance schemes. They also have the following accreditations:

- The Contractors Health and Safety Assessment Scheme (CHAS)
- Construction Plant Compliance Scheme (CPSC)
- Green Roads Alliance
- Construction Products Association (CPA)
- National Plant Operators Registration Scheme (NPORS)

1.6 This application seeks permission to amend the maximum storage limit for hazardous waste and add EWC 191212.

1.7 Table S1.1 of the permit sets a maximum storage limit of hazardous waste of 1,000 tonnes at any one time. This should be 10,000 tonnes at any one time.

1.8 The Introductory Note to the permit also sets out that no more than 1,000 tonnes of non-hazardous waste will be stored at any one time. Again, this should be 10,000 tonnes.

1.9 It is not clear if this was an error during the application process, but the site was designed and constructed to store a higher volume of waste.

1.10 The site is already permitted to accept 190112 – Bottom Ash (IBA). The 191212 would allow OCL to receive IBAA, this is Incinerator Bottom Ash Aggregate produced at another waste site. By having EWC191212, OCL would receive IBAA for further treatment at their site.

1.11 This waste code is directly associated with highway maintenance works. This application does not seek to accept waste from other construction projects. A risk assessment has been completed to assess the risks associated with the proposed changes. This has concluded that the changes do not increase the risks associated with the activities at this site.

1.12 The application is supported by the following documents:



- Non-Technical Summary
- Summary EMS (within this document)
- Proposed Changes (within this document)
- BAT Assessment (updated)
- Risk Assessment

1.13 The BAT Assessment, Version 4, was approved by the Environment Agency in March 2022. A revised version has been prepared to support this application. However, the proposed changes do not significantly alter the assessment. The BAT Assessment Version 5 has been updated to include the proposed changes (in red text).



2. SUMMARY ENVIRONMENTAL MANAGEMENT SYSTEM AND OPERATIONS

Management System

- 2.1 The company has developed its own Environmental Management System (EMS) This will be updated once the permit has been varied.
- 2.2 The EMS is summarised in this section. The EMS provides the operational procedures for the site including waste acceptance, processing, and storage. It follows the headings set out in Environment Agency Guidance – Develop A Management System: Environmental Permits.
- 2.3 Drawings show the site surfacing, locations of existing buildings, drainage and site entrance.
- 2.4 The EMS provides the operational procedures for the site including Waste Acceptance, Reception, Processing, Quarantine, Storage and Rejection of Wastes, Waste Dispatch, Site Drainage, Environmental Monitoring, and Reporting. This is based on the BAT Assessment.
- 2.5 A summary of each main section is provided below.

General Operations

- 2.6 The EMS sets out the operational procedures for the site to include waste acceptance, checking, sorting and processing, storage, dispatch, environmental controls and checks. The following provides an outline of the processes.
- 2.7 The site is permitted to receive and treat tar based wastes from road refurbishment projects. The operator will handle the following waste streams at the site:

Hazardous Waste

- 17 03 01* bituminous mixtures containing coal tar
- 17 03 03* coal tar and tarred products

- 2.8 The 170301* and 170303* waste streams are both similar in nature and will be treated in the same process. Although the likelihood of receiving 170303* is very low. The treatment process will use cold foam encapsulation in accordance with RPS075. This uses a cement and/or foamed bitumen to produce Hydraulically Bound Materials (HBM), Cement Bound Granular Mixtures (CBGM) or Foambase Asphalt. These waste streams will be crushed and treated using the cold foam process.

Non-Hazardous Waste

- 17 01 01 concrete
- 17 01 02 bricks
- 17 01 03 tiles and ceramics
- 17 01 07 mixtures of concrete, bricks, tiles and ceramics other than those mentioned in 17 01 06
- 17 02 02 glass
- 17 03 02 bituminous mixtures other than those mentioned in 17 03 01
- 17 05 04 soil and stones other than those mentioned in 17 05 03
- 17 05 08 track ballast other than those mentioned in 17 05 07



17 09 04	mixed construction and demolition wastes other than those mentioned in 17 09 01, 17 09 02 and 17 09 03
19 01 12	bottom ash and slag other than those mentioned in 19 01 11
19 12 09	minerals (for example sand, stones)
19 12 12	Other wastes from mechanical treatment of waste other than those mentioned in 191211*
19 13 02	solid wastes from soil remediation other than those mentioned in 19 13 01
20 02 02	soil and stones
20 03 03	street-cleaning residues

2.9 Whilst this is a comprehensive list, the main waste streams that will be accepted routinely will be concrete, bricks, bituminous mixtures, mixed C&D waste, soils and stones and minerals. These wastes will be treated by screening and crushing to produce a range of aggregates such as:

- Type 1 crushed concrete
- Type 2 crushed concrete
- Type 3 crushed concrete
- 6F2 crushed concrete
- 6F1 concrete fines
- Screened soil
- 10mm Recycled Shingle
- 20mm Recycled Shingle

2.10 Waste coded EWC 191212 will be specifically for IBAA, an Incinerator Bottom Ash Aggregate. This is currently produced by third party operators. Its use is restricted by the Regulatory Position Statement 247. For the projects where IBAA cannot meet the RPS requirements, it will be transferred to the OCL site for further waste treatment.

2.11 OCL can use IBAA in two ways:

- As a constituent for the mixed materials (HBM and CRBM)
- As a constituent in “EcoBlend” mixes where their addition to primary aggregates gives an environmentally enhanced and cheaper version of the pure primary host that it has been mixed with.

2.12 The IBAA will be received and treated in the same manner as other similar non-hazardous wastes streams.

2.13 Waste streams will be treated using separate processes. The objective of the treatment process is to enable the waste to be re-used in construction projects. For hazardous waste, this will require encapsulation. For non-hazardous waste, this will involve treatment to produce specified grades of aggregates.

2.14 It is proposed to treat up to 30,000 tonnes of hazardous waste per annum, and 45,000 tonnes of non-hazardous waste per annum. The maximum throughput for the site will be 75,000 tonnes per annum. Whilst the site will accept up to 30,000 tonnes of hazardous waste, if for any reason the site does not manage that level of throughput, the difference could be met with non-hazardous waste.



Site and Equipment Maintenance Plan

- 2.15 The Depot Manager will be responsible for inspecting the storage areas and preventative maintenance will be undertaken according to the Site Daily Checks Form.
- 2.16 Plant and machinery on site is visually inspected by the operator before it is used as part of management of their own risks and health and safety. This is covered in training for plant operatives. Each vehicle contains a Defect Form. This is completed each day before use. The forms are carbon copied to allow one copy to be filed in the office and one remains in the vehicle. Any defects are reported to the Depot Manager.
- 2.17 In addition to scheduled preventative maintenance of equipment and machinery, in accordance with legal requirements or manufacturer's recommendations, reactive maintenance will be carried out if needed in accordance with inspection findings. This will be recorded in the site diary.
- 2.18 Site based infrastructure will be checked as follows:

Equipment	Maintenance Frequency	Responsibility
Depot Weighbridges	Annual	Depot Manager
Drainage Interceptors	6 monthly	Depot Manager
Diesel Fuel Pumps	Annual	Depot Manager
Depot Loading Shovel	6 monthly	Depot Manager
Mobile Plant	As per manufacturers Specifications	Depot Manager

- 2.19 The site diary will be maintained and updated to include the following: -
- Start and finish of daily waste management activities on site (operational hours)
 - Maintenance
 - Breakdowns
 - Emergencies
 - Problems with waste delivered and action taken
 - Site inspections and consequent actions carried out by the operator
 - Technically competent management attendance on site; the date and the time onto site and the time left site
 - Weather conditions
 - Complaints about site operations and actions taken
 - Environmental problems and remedial actions
- 2.20 The site diary will be kept in the site office and updated daily.

Contingency Planning

- 2.21 In conjunction with the Accident Prevention and Management Plan, the EMS includes Contingency Planning. This includes measures to be implement in the event that the site is forced to closed due to unplanned events (for example, flooding), or in the event of breakdowns. The procedures will be used to ensure business continuity without impacting the environment.



Accident Prevention and Management Plan

- 2.22 The Company recognises the importance of the prevention of accidents that may have environmental consequences and that it is crucial to limit those consequences.
- 2.23 An accident management plan is maintained at the facility to ensure the facility, and facility staff are fully prepared for such incidents. The accident management plan will be reviewed at least every four years or as soon as practicable after an incident with changes made accordingly to minimise the risk of recurrence.
- 2.24 The Accident Prevention and Management Plan sets out the contingency measures required to deal with plant breakdowns, vandalism, fires, flooding, and bad weather. These measures are provided for the situations which could change the normal operations.
- 2.25 For each unforeseen event, the plan set out the following:
- Likelihood of the accident/event occurring
 - Consequence of the accident/event occurring
 - Measures taken to avoid the accident occurring
 - Measures taken to minimise the impact.
- 2.26 The EMS also provides a list of emergency contacts as well as contacts for the estate and adjoining businesses to contact in the event of an emergency.

Complaints

- 2.27 A complaint procedure is also in place at the site. This is used to report and respond to complaints received by regulators, local businesses, customers and members of the public.
- 2.28 The complaint procedure will be documented to include the nature of the complaint, investigation, action taken and reporting findings to complainant.

Noticeboard

- 2.29 There is a noticeboard at the site entrance which provides the following information:
- The permit holder's Name
 - An emergency contact name and telephone number
 - A statement that the site is permitted by the Environment Agency
 - The permit number
 - Environment Agency telephone number 03708 506506 and the incident hotline 0800 807060

A Changing Climate

- 2.30 The operator is aware of the changing climate the UK is experiencing now and likely to experience in the future. With reference to the EA guidance, the UK can expect the following:



- Higher average temperatures – particularly in summer and winter
- More heat waves and hot days
- Rising sea levels
- Changes in rainfall patterns and intensity
- More storms

2.31 The site was designed with climate change in mind.

Technical Competence and Staff Training

2.32 The overall operations will be overseen by a Technically Competent Manager (TCM). There will also be a Depot Manager to oversee the day to day operations. The TCM will be responsible for ensuring the requirements of continued competency is met. A copy of the Certificate will be kept at the site office. The TCM and Depot Manager will both carry out similar functions on site, with the TCM providing the overall management to ensure compliance.

2.33 OCL intend to implement a Competent Management System (CMS). This is an approved alternative scheme that will allow OCL to satisfy the TCM requirements as a corporate body rather than rely on individuals.

2.34 The Site Management will be responsible for the control of incoming and outgoing vehicles, checking Duty of Care documentation, keeping and maintaining all computerised records, checking in all visitors to the site, issuing Health & Safety instructions and reporting any complaints to the management.

2.35 Other site personnel will include administrative staff and site operatives.

2.36 The facility is managed by staff who are competent to operate the facility without causing pollution. The management system delivers the following:

- all staff have clearly defined roles and responsibilities;
- records are maintained of the skills required for each post;
- records are maintained of the training and relevant qualifications undertaken by staff to meet the requirements of each post; and operations are governed by standard operating instructions.

2.37 Operations at the facility are under the control of a technically competent person who holds the relevant Certificate of Technical Competence (COTC) under the Waste Management Industry Training and Advisory Board (WAMITAB) scheme.

2.38 An assessment of training needs will be carried out to identify the posts for which specific environmental awareness training is needed, and the scope and level of such training. The assessment of training needs is reviewed on an annual basis.

2.39 The training programme will ensure that all relevant staff will be aware of the following:

- Regulatory implications of the permit for the facility and their specific work activity;
- All potential environmental effects from operations under normal and abnormal circumstances;



- The need to report deviations from the permit; and
- Prevention of accidental emissions and action to be taken should accidental emissions occur.

Records

- 2.40 All records required to be made by this permit shall be comprehensible, legible, and consistent. If amendments need to be made, they are done so in such a way that any subsequent amendments remain legible. Records, plans and management systems required to be maintained by this permit shall also be kept on site.
- 2.41 All reports and notifications required to the permit by the Environment Agency shall be made to the Environment Agency using the contact details supplied in writing by the Environment Agency. Within one month of the end of each quarter, the operator shall submit waste returns to the environment agency using the form made available for the purpose, the information specified on the form relating to the site and the waste accepted and removed from it during the previous quarter.

Review Management System

- 2.42 The EMS will be reviewed and updated if any of the following occur:
- Any compliance issues on the site which require mitigation or management intervention.
 - Changes to the site operations.
 - Changes to local environment which introduces new receptors to the area.
- 2.43 Some changes may require staff training, this will be carried out and records updated accordingly.

Site Closure

- 2.44 If the operations cease at the site, the operator will proceed with an application to surrender the permit. This will require a Site Closure Plan to demonstrate that activities at the site have ceased and pose no risk to the environment.
- 2.45 The operation is quite straightforward as it uses mobile plant and equipment and would not require detailed plant decommissioning.



3. PROPOSED CHANGES

- 3.1 It is proposed to increase the maximum storage capacity for hazardous and non-hazardous waste to 10,000 tonnes each.
- 3.2 It is not clear how the 1,000 tonnes storage limit was first applied. The site was designed and constructed to handle up to 10,000 tonnes of waste for each type. The site has been constructed and the storage capacity limits set out in the BAT assessment have been updated. This shows that the site can store up to 10,000 tonnes of each waste type at any one time.
- 3.3 All the hazardous waste capacity will be within the part of the site with separate drainage.
- 3.4 This application also seeks permission to add one waste code to the permitted waste list as follows:
- EWC 191212 Other wastes from mechanical treatment of waste other than those mentioned in 191211*
- 3.5 This waste code is directly associated with highway maintenance works. This application does not seek to accept waste from other construction projects.
- 3.6 The site is already permitted to accept 190112 – Bottom Ash (IBA). The 191212 would allow OCL to receive IBAA, this is Incinerator Bottom Ash Aggregate produced at another waste site. OCL would receive IBAA for treatment at their site. The IBAA is non-hazardous and would be received and treated in the non-hazardous part of the site.
- 3.7 The IBAA can be used as a constituent in materials already produced at the site, namely:
- mixed materials (HBM and CRBM); and
 - in “EcoBlend” mixes where their addition to primary aggregates gives an environmentally enhanced and cheaper version of the pure primary host that it has been mixed with.
- 3.8 The treatment processes for this waste will be the same as currently used on the site. The nature of the material is the same as already permitted and received. The waste does not require any additional or special handling. There is not additional risk associated with this waste.

Site Boundary

- 3.9 There are no changes to the site boundary.

Site Infrastructure

- 3.10 The entire site is concreted, with separate drainage systems for the hazardous and non-hazardous waste areas. There will be no change to the site infrastructure.
- 3.11 The maintenance of the drainage system will fall within the existing EMS Planning Preventative Maintenance Programme.

4. EMISSIONS AND MONITORING

- 4.1 An Environmental Risk Assessment has been prepared for the proposed changes. The additional waste code will not increase the risk associated with the site activities. The waste is a slight variation to 190112, which is already permitted at the site.
- 4.2 The proposed increase in the storage capacity will not increase the risk. The site was designed and constructed to store up to 10,000 tonnes of hazardous waste at any one time. No additional land is required for this, and the hazardous waste storage area (which has its own sealed drainage system), can accommodate this capacity.
- 4.3 The non-hazardous waste area was also designed to manage up to 10,000 tonnes of waste at any one time.