February 2023



Biffa Waste Services Ltd (Syracuse Waste Limited)

Milton Keynes Waste Transfer, Treatment & Recycling Facility

Environmental Permit Variation

Supporting Statement

February 2023

NON-TECHNICAL SUMMARY	
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1.0 Introduction

The permit holder and operator is Syracuse Waste Limited (Biffa) which is a wholly owned subsidiary of Biffa, whose registered address is Coronation Road, Cressex, High Wycombe, Buckinghamshire, United Kingdom, HP12 3TZ and company number **13269384**.

Syracuse Waste Limited (Biffa) operates as part of Biffa, who are one of the UK's leading recycling and waste management companies.

For clarification purposes from this point forwards the permit holder and operator will be referred to as Biffa.

The Environment Agency application forms require a non-technical summary to be submitted in support of any bespoke installation environmental permit variation, which includes the following:

- an explanation of exactly what is being applied for;
- a summary of the regulated facility; and
- a summary of the key technical standards and control measures arising from the risk assessment.

This Non-Technical Summary should be read in conjunction with the following appendices of this application:

- Application Forms A, C2, C4, F1 and Supporting Information;
- Appendix 7: Pre-application discussions and advice;
- Supporting Statement (Ref: 202302_WTTRF_SS_KB3605-V003);
- Appendix 6: Environmental Management System (EMS) Version 2 February 2023
- Appendix 11: Fire Prevention Plan
- Appendix 10: Drawings

1.1 The Site

Syracuse Waste Limited (Biffa) holds an Environmental Permit for its Milton Keynes Waste Transfer, Treatment and Recycling Facility (the Site), reference EPR/KB3605GE/V003.

Biffa have prepared an application to vary the Environmental Permit for the former Milton Keynes Materials Recycling Facility (MRF). The facility was originally designed for the treatment of mixed recyclables and pre-segregated waste. Following the acquisition of the Site by Biffa from Viridor we were informed by the Milton Keynes Council (MKC) of the intent to change the operational activities from that of a Material Recycling Facility (MRF) to a Waste Transfer, Treatment & Recycling Facility. Significant investment and improvement has been undertaken at the site as part of the transformation project.

1.2 Proposed Changes

Biffa is applying to vary the Environmental Permit in relation to the points detailed below:

i) <u>Recovery (R) & Disposal (D) Activities including Clinical Waste Transfer and</u> Storage

This information is submitted to support the permit variation application EPR/KB3605GE/V003 and the changes to the waste storage and treatment activities.

As part of Biffa's contract with MKC the following waste operations are carried out at the Site:

- Acceptance of mixed food and green waste, no additional permitted activities are required to accept store and transfer this waste, prior to sending off site for green waste composting.
- Shredding of large domestic waste and fly-tipped wastes collected by MKC. These wastes may include Persistent Organic Pollutants. The site activities already allow for the shredding of waste, but additional disposal activity codes D9 and D14 have been applied for following discussions with the local Environment Agency officer, however not having these codes listed within the existing permit does not prevent the shredding activities to commence.
- Acceptance of clinical waste for storage and transfer, with no treatment. As the Site has not previously accepted clinical then additional permitted activities have been applied for.
 - In discussion with MKC it was confirmed that they currently collect clinical waste two days per week from total of 80-100 properties and currently deliver to an NHS facility.
 - The waste is mostly consisting of yellow / orange bagged waste under EWC code 18 01 03 (hazardous) and 18 01 04 (non-hazardous hygiene products).
 - Currently MKC do not collect cytotoxic / cytostatic waste or any other medicines as these go back to doctors' surgeries / pharmacies / hospitals, however we have applied for a wider range for waste codes, should we wish to accept such wastes in the future.

Whilst the current permitted activities allow for the acceptance of the mixed food/green waste as discussed in the section above, as part of this permit variation we are applying for additional recovery (R) and disposal (D) codes to allow for the site to accept clinical wastes for storage and transfer. In the Supporting Statement Table S1.1 has been updated to include additional activities R12, D9 and D14 and it is suggested that this table is included when drafting the consolidated permit.

ii) <u>Permitted Waste List</u>

The Site was originally designed for the treatment of mixed recyclables and presegregated waste. Following the acquisition of the Site by Biffa from Viridor we were informed by the Milton Keynes Council of the intent to change the operational activities from that of a Material Recycling Facility (MRF) to a Waste Transfer, Treatment & Recycling Facility. Significant investment and improvement has been undertaken at the site as part of the transformation project.

The permit historically referred to the Site as a Materials Recycling Facility (MRF) and during the Sites history the permit has been transferred to a number of waste operators. The variation EPR/GB3030AH/V002 issued to Viridor Waste Management Limited on 28th September 2012, includes a permitted waste list which was entitled: *Permitted waste types and quantities for Materials Recycling Facility and Waste Transfer Station*, and the permitted activities reflect that of a waste transfer station.

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Biffa will operate the Site as a household, commercial and industrial waste transfer station with treatment, with the storage and transfer of clinical wastes and wastes destined for onward recovery, recycling and reuse. To accurately reflect the future permitted activities at site it will be now referred to as Milton Keynes Waste Transfer, Treatment and Recycling Facility.

Biffa has updated the permitted waste list to be based on the latest standard rules set for a non-hazardous transfer station with treatment and also included a selection of clinical waste codes. The Permitted Waste List includes two tables which refers to the waste types for both activities Table S2.1 for the A1 activity and Table S2.1a for the A2 Activity. The full list of wastes applied for are included under Appendix 17 of the variation application.

iii) <u>Permit Variation and Consolidation</u>

Over the last few years there have been a number of permit variations and more recently permit transfers then we would like to request that as part of the normal permit variation all of the stand-alone notices are now consolidated into one document using the current bespoke permit template of conditions.

2.0 Assessments

An Environmental Risk Assessment (ERA) has been undertaken to determine if the fugitive emissions anticipated from the operational activities at Milton Keynes Waste Transfer, Treatment and Recycling Facility (the Site) may have an effect on any sensitive receptors located close to the site. The ERA is included in Appendix 15.

A Habitats Risk Assessment has been carried out to support this application to vary Environmental Permit EPR/KB3605GE. This risk assessment considers the potential hazards and risk sources, pathways, and receptors as well as the probability and consequence of each risk linkage to designated nature conservation areas and habitats located within close proximity of the facility. Mitigation measures to prevent environmental harm and the resulting risks levels are also given cognizance in this assessment.

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3.0 Conclusion

The overall conclusion of the studies undertaken in support of this permit variation application for Milton Keynes Waste Transfer, Treatment and Recycling Facility is that there is unlikely to be a significant environmental impact.

Biffa are fully committed to ensuring the highest standards are met and will undertake their activities in a manner consistent with best industrial practices and in accordance with the company's integrated management system.