

Growing Beds Recycling Services Limited

Non-Technical Summary

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TABLE OF CONTENTS

1	NON-TECHNICAL SUMMARY	1
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1 NON-TECHNICAL SUMMARY

1.1 OPERATIONS

Process Description	<p>The site is looking to increase the installation boundary by adding land to the permitted area and to increase throughput of the site to 49,000 tonnes per annum.</p> <p>In addition, it is proposed to add a non-hazardous wood shredding activity S5.4 A(1)(a)(iii) pre-treatment for incineration as the shredding activity exceeds 50 tonnes per day. It should be noted that this has been undertaken for a number of years now with the full consent of the local officer and this application is to formalise that activity.</p> <p>The 49,000 tonnes per annum throughput will be split across the composting and wood shredding activity. There is no proposed maximum on each process other than the total throughput of the site to allow for operational flexibility and seasonality of each activity.</p>
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1.2 BAT BENCHMARKS

BAT Benchmarks	<p>This report has been structured in accordance with the relevant technical guidance for the proposed activities, namely:</p> <ul style="list-style-type: none"> ■ Commission Implementing Decision (EU) 2018/1147 of 10 August 2018 establishing best available techniques (BAT) conclusions for waste treatment ■ Non-hazardous and inert waste: appropriate measures for permitted facilities - Guidance - GOV.UK (www.gov.uk) ■ https://www.gov.uk/guidance/risk-assessments-for-your-environmental-permit
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1.3 MANAGING YOUR ACTIVITIES

Accident Management	<p>An accident management plan (Appendix D) has been developed as part of this application in accordance with Environment Agency web guidance.</p> <p>The raw materials used and stored on site which are diesel, anti-freeze and lubricating oil are recorded and controlled. The diesel is digitally monitored.</p>
Environmental Management Systems	<p>An EMS will be developed for the installation within the first year of the varied permit being issued.</p>
Energy Efficiency	<p>The site is a very low energy user with electricity only for office activities. The following energy efficient measures have been adopted at the site:</p> <ul style="list-style-type: none"> ■ All lighting in cabins and office areas is LED. ■ The yard lighting is also LED.

	<ul style="list-style-type: none"> ■ In winter the site closes earlier to limit staff in darkness and reduces overall light usage. ■ There is no use of site lighting as part of security arrangements as the CCTV cameras operate on low light and don't require lighting.
Efficient Use of Raw Materials and Water	<p>There is no gas supply to the site.</p> <p>The site makes use of a limited number of raw materials which mainly relate to the operation of the shredder and mobile plant. These are diesel, antifreeze, screen wash, hydraulic oil and engine oil. Petrol is used for engine pumps.</p> <p>Water use at site is only for domestic consumption. Any water falling on the yard area is directed to the lagoons. This is then used for dust control, wetting the compost as part of the PAS100 treatment process and for adding into the shredder whilst shredding as a dust control measure.</p>
Avoidance, Recovery and Disposal of Wastes	<p>The only waste generated at site are 2 general waste council bins, a scrap metal bin and dry recyclables bin.</p>

1.4 ENVIRONMENTAL IMPACTS AND MONITORING

Emissions to Air	<p>There will be no point source emissions to air associated with this variation.</p>
Fugitive Emissions to Air	<p>There will be no point source emissions to air associated with this variation. The shredding activity could potentially cause some dust emissions but these would be more fugitive in nature. The site has purchased an Inventhor 9 low speed low dust shredder which would reduce any potential dust impacts. Furthermore, as detailed within the dust management plan the following measures are in place for the management and control of dust emissions associated with the wood shredding activity.</p> <ol style="list-style-type: none"> 1. A low speed-low dust generating shredder is used which would prevent significant emissions of dust occurring. 2. Water is added to the shredder hopper at the rate of 100kg/h which would damp down any dust making it less mobile and would stay within the confines of the site boundary. 3. The wood is predominantly sourced from household waste recycling centres and is stored in the open on site. This means it would be naturally wet and would not generate as much dust as drier wood stored indoors. 4. The wood is shredded near to the fuel bays which are constructed of prefabricated to a height of 4.5m with a 0.5m freeboard. Wood would be discharged to the bays below the height level of the bays which would thus contain it. 5. Fuel bays have sides of the same height and are located either side on or with their rear to the prevailing wind direction which would ensure any shredded wood is not wind entrained. 6. The fuel specification for the biomass incineration plant is 0-150mm with most of the shredded material much too large to become windborne. 7. The site has a weather station and will not undertake shredding when windspeed gusts to over 20 mph reducing the chances of any dust becoming airborne. 8. The site boundary where shredding takes place has a 5-6m earthen bund which would further prevent any dust egress as this is significantly higher than the height of the shredder, trommels and any other activity likely to generate dust. 9. The site has 2 lagoons filled with collected rainwater which can be used to dampen yard areas or wood piles to ensure there is minimal dust generation in dry periods. <p>It is considered that the mitigation measures are effective in protecting nearby sensitive receptors from any dust emissions for the following reasons:</p> <ol style="list-style-type: none"> 1. The closest local site receptors are two houses 200m to the South of the site. These are upwind of the site for 90% of the time and given the site only operates 8am to 7pm this limits further the risk of any pollution occurring.

Emissions to Water	2. The other receptor downwind from site are over 1km away and is a local farm which would generate dust emissions of its own with its farming activities so would not be considered particularly sensitive.
	3. TGN M17 states that dust over 10 µm falls out between a couple of hundred metres and 1km. Therefore, any dust would not reach any of the nearby receptors to cause nuisance.
Fugitive Emissions to Water	There are no discharges to water at the site and therefore no monitoring is required.
Groundwater Impacts	There are no fugitive discharges to water at the site and therefore no monitoring is required.
Odour	No deliberate discharges will be made direct to groundwater and the site has lagoons for the collection of all water from the site.
	The waste wood has been received at site for 17 years without any odour complaint. Therefore, as the wood to be received has had no complaints with regards to odour an Odour Management Plan is not required.
Noise and Vibration	The site has been operating since 2005 and there have been no noise complaints even though the shredding activity has been undertaken during that time. The shredding activity is not considered to pose a risk to sensitive receptors as most of the receptors are upwind of site. The site is also surrounded by an earthen bund 5-6m high which would break line of site with these receptors and act as an acoustic barrier.
	It is therefore considered that the proposed shredding activity will not have a significant noise impact upon the local sensitive receptors.
Monitoring and Reporting of Emissions	Monitoring of emissions to air and water will be undertaken in accordance with the methods and frequencies defined in Section 4 of the main application. No monitoring is proposed for the discharge of clean rainwater to surface water.
	All wastes removed from site will be recorded.
	Key process variables will be monitored to allow efficient operation of the process and associated activities.

1.5 RECORDS, REPORTING AND NOTIFICATION

Records, Reporting/Notification	A system is in place for record keeping with waste transfer notes retained for 2 years and other records relevant to the permit retained for 6 years.
	Reporting and notification procedures will be implemented to address the requirements of the varied permit when issued.

1.6 SITE CONDITION REPORT

Site Condition Report	A report describing the condition of the site is included with this application.
	There have been no ground investigation reports undertaken with regards to the site. The local Environment Agency Site Officers have been involved with the site throughout its operational history and understand the previous use of the site and the potential for contamination to be present.
	The site has been in historical use as a waste management activity since 2005 and prior to that was agricultural land. The new land to be added into the installation boundary is agricultural land.
	All site activities have been undertaken on Pav2 hardstanding which is an effective barrier between the activities and the ground/groundwater. All water at site is collected within the lagoons for reuse so there is very little chance of pollution occurring.
	There was a fire in the composting activity (not subject to this variation) in 2019 and this resulted in no pollution as the lagoons were used to collect firewater and this was able to be

recycled also. The hardstanding remained intact throughout this event. Due to the rural nature of the site the fire and rescue service undertook a controlled burn out which is their preferred method to manage a fire at the site and is outside the control of Growing Beds.

It is acknowledged there is the potential for pollution to be present at site given the activities undertaken and the previous fire although this is considered extremely unlikely and that is the permit holder's responsibility to clean the land to a suitable standard prior to the surrender of the permit. The surrender standard would be to that suitable for agricultural use which would be consistent with the undertakings at the site prior to its development.

Environment Agency Horizontal Guidance H5 Environmental Permitting Regulations Site condition report – guidance and templates states:

“if you choose not to submit any monitoring data you should provide a justification for not doing so in your report. In this case you will be accepting the risk that you may be required to clean up pre-existing contamination when you surrender your permit”.

The requirement of undertaking further review is not a mandatory requirement as can be seen from the above, however, whilst that is the case and it is acknowledged that the landowner will retain responsibility for any pollution present the standard condition with regards to soil and groundwater monitoring will be adhered to from the date of issue of the varied permit.

1.7 HABITAT REGULATION ASSESSMENT

Habitat regulation
assessment

After reviewing the Defra portal Magic it was found that there are neither SPA, SAC or Ramsars or proposed sites within 5km of the Growing Beds site.

It is considered that as TGN M17 monitoring of particulate matter in ambient air around waste facilities states that dust over 10 µm falls out between a couple of hundred metres and 1km that there would be no potential for the site to have an impact upon a European designated site nor Tilwick Meadows (which is over 1km from site) and therefore a habitats regulation assessment is not required and this has not been considered further.