

Environment Agency
Permitting Support Centre
Quadrant 2
99 Parkway Avenue
Parkway Business Park
Sheffield
S9 4WF

recycling and recovery UK

27th November 2024

Dear Sir/Madam,

EPR/PP3494ZJ/V003– Response to Request for Information

Further to the issue of the 'Not Duly Made' notification dated 13/11/2024 for the aforementioned application, please find below the queries raised and our response. The responses below correspond with the individual questions within the 'Not Duly Made' notification and therefore, should be directly referred to.

Form C2

- **Confirm if R2 is to be removed from permit.**
- **Confirm if D14 is to be added to permit.**

With reference to Table 1.1 of the original waste management licence (issued 29/09/2003), code R2 refers to the '*recycling or reclamation or organic substances which are not used as solvents*' as per Part IV of the Waste Management Licensing Regulations 1994.

Following the introduction of the Waste Framework Directive in 2008, this activity was renumbered as R3. Code R2 now refers to solvent reclamation/regeneration which is not undertaken at the site and therefore I can confirm that code R2 needs to be removed from the permit.

Also, it is key to note that the original descriptions for R3 and R4 have also changed as a result of the Waste Framework Directive. Code R3 (recycling/reclamation of metals and metal compounds) is now numbered as R4. Code R4 (recycling/reclamation of other inorganic materials) is now numbered as R5. For the purposes of this application, SUEZ would like to maintain both activities in the environmental permit.

Finally, I can confirm that SUEZ would like to add code D14 to the environmental permit. This is a typical disposal code for household waste recycling centres (HWRC) including the standard rules permit SR2015 No.20. Also, it is key to note that this variation forms part of a batch of permit variations that SUEZ have submitted for their household waste amenity sites in Northumberland. Details of some of the sites are provided below as part of our response to the Non-Technical Summary.



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As part of the process, SUEZ would like to ensure that all of the sites are permitted to undertake the same waste activities. Some of these sites are already permitted to operate under D14 and so it is important that the permit for Haltwhistle HWRC is updated to include D14.

A revised copy of the Part C2 form (Version 2) is enclosed with this response to confirm the removal of R2 and the addition of D14. This is noted as part of our response to Question 2b. In addition, the Non-Technical Summary (EP4 – Version 2) has been updated (as enclosed) to ensure consistency between the application documents.

Technical Ability

- **Update the information provided in Operator Information sheet (EP6) and submit evidence demonstrating the proposed Technical Competent Manager(s) (TCM) is/ are appropriately qualified.**
- **Submit date of birth information for any new TCM being proposed.**
- **Confirm which site(s) each Technical Competent Manager covers.**

Please find enclosed a revised copy of the Operator Information sheet (EP6 - Version 2) with up-to-date evidence of technical competence for the principal technically competent manager (TCM) for the site and other TCMs that may provide TCM cover if the principal TCM is not available.

Site Layout plans

- **Submit a proposed site layout, featuring current and wastes proposed to be accepted.**

Further to the comments provided in the 'Not Duly Made' notification, please find enclosed a revised copy of the site layout plan (EP8, Section 1.1, Figure 2 – Version 2). Please note, this drawing was solely updated to change the drawing title from 'existing site layout' to 'proposed site layout'.

It is key to note that the layout plan is based on the waste streams that SUEZ expect to receive following the issue of the permit variation. As such, the plan does not provide details for all of the proposed waste streams such as hazardous household chemicals.

However, in the event that the site is required to actively accept more of the proposed waste streams, SUEZ update the site layout plan accordingly.

In addition, please find enclosed a revised copy of the Management System Summary document (EP8, Section 1.0 – Version 2). This document has been updated to reflect amendments to all of the documents that were updated in response to this 'Not Duly Made' notification.

Q5c) Non-Technical Summary (EP4)

- **Clarify whether hazardous chemicals are to be accepted. If they are not to be taken please remove them from the list of proposed waste codes.**

SUEZ operate the site and several other similar facilities on behalf of Northumberland County Council (NCC) under Private Finance Initiative contract. With reference to NCC's website, hazardous household chemicals are not accepted at any of the HWRCs in Northumberland and so householders are advised to use NCC's collection service. The only exception is waste engine oil which is currently accepted at the HWRCs.

Despite this, the permits for the following sites can accept hazardous household chemicals and are operated by SUEZ as part of their contract with NNC. In addition, it is key to note that these permits have been varied by the EA over the past 12 months:

- Bebside HWRC – EPR/HP3598EL
- Prudhoe HWRC - EPR/HP3898ET
- Morpeth HWRC – EPR/DP3897LH
- Berwick TS & HWRC – EPR/TP3594ZM
- Alnwick TS & HWRC – EPR/PP3694ZS
- Hexham TS & HWRC – EPR/CP3397ZZ

As mentioned in a previous comment, the variation for Haltwhistle HWRC forms part of a batch of permit variations to ensure that all of the HWRC sites in Northumberland can accept the same waste codes for consistency. Although the HWRCs do not actively accept hazardous household chemicals at the moment, SUEZ would like the ability to accept hazardous chemicals at the sites to ensure operational flexibility in the future.

A revised copy of the Non-Technical Summary (EP4 – Version 2) is enclosed with this response to provide clarity in connection to hazardous household chemicals.

Q5e) Fire Prevention Plan (FPP)

- **Clarify whether hazardous chemical are to be accepted, and amend 2.6.5 if they are to be accepted.**

As mentioned in a previous comment, the HWRCs in Northumberland do not accept hazardous chemicals and it seems unlikely that the site will begin to accept these waste streams following the issue of the permit variation. However, SUEZ are seeking to vary the permit to ensure that the site can accept hazardous chemical to ensure operational flexibility in the future. As such, it is considered that amendments are not required to Section 2.6.5 of the FPP.

- **Ensure the site layout and drainage plans reflect the scope proposed in the variation application.**

As mentioned in a previous comments, the site layout plan has been updated to change the drawing title from 'existing site layout' to 'proposed site layout'. A revised copy of this plan is enclosed with this response. The drainage plan (EP8, Section 1.1, Figure 5 – Version 2) has been updated and is enclosed with this response. In addition, a revised FPP (EP8, Section 1.7 – Version 2) is enclosed with this response to reflect changes to the site layout and drainage plans.

Q6) Environmental Risk Assessment - ERA (EP8 - Doc 1.3)

Please:

- **explain in the risk assessment why the extra waste codes (hazardous and non-hazardous) requested would not increase risk to the habitats and other receptors.**
- **include flood risk assessment as the site is in Flood Zone 2.**

Please find enclosed a revised copy of the Environmental Risk Assessment (EP8, Section 1.4 – Version 2) where Section 3 and Tables 2, 4 and 5 have been updated to address the comments provided in this 'Not Duly Made' notification. Please note, the risk management measures in Tables 2 and 4 will be applied to minimise the overall risk. They are not specific to any of the receptors listed in Table 1 of the Environmental Risk Assessment.

Form Part C4

Table 1a:

- **(In relation to above question on Form C2.) Confirm whether R2 for recycling/ reclamation of organic substances is still required, or is to be removed from the permit.**

As mentioned in a previous comment, I can confirm that SUEZ would like to remove code R2 (solvent reclamation/regeneration), but would like to maintain the code's original description (recycling/reclamation of organic substances) which relates to code R3 from the Waste Framework Directive.

A revised copy of the Part C4 Form (Version 2) is enclosed with this response to confirm the removal of R2 and the addition of D14. This is noted as part of our response to Table 1a.

- **State the maximum amount in tonnes per day of hazardous wastes that will be treated for (1) recovery, (2) disposal, (3) temporarily stored onsite.**

Table 1a of the Part C4 Form has been updated accordingly. Please note, there is no physical treatment of hazardous waste at the site. Hazardous waste is solely stored on site prior to transfer off site for further disposal and/or recovery. As such, the treatment capacity for hazardous waste is 0 tonnes and the storage limit is 50 tonnes as per the relevant IED limits in Schedule 1, Section 5.6 of the Environmental Permitting (England and Wales) Regulations.

- **State the amount in tonnes per day of non-hazardous wastes that will be treated for (1) recovery, (2) disposal.**

Table 1a of the Part C4 Form has been updated to provide the treatment capacity for non-hazardous waste. At present, there is no mobile plant on site to undertake any treatment under D9 or D14 however, SUEZ would like to maintain both disposal codes in the permit to ensure operational flexibility in the future. As such, Table 1a of the Part C4 form has been updated to note that the treatment capacity of non-hazardous waste for the purposes of disposal (D9 and D14) will be 50 tonnes in aggregate. This is based on the relevant IED limits in Schedule 1, Section 5.4 of the Environmental Permitting (England and Wales) Regulations.

Q3a Supporting documents

- **Describe how the new wastes including but not limited to all received hazardous waste will be handled, including waste acceptance, quarantine, storage and segregation.**

Details regarding waste acceptance, quarantine, storage and segregation of the proposed waste codes are provided in the Operations & Emissions Management Plan. This is noted in the revised copy of the Part C4 Form (as enclosed).

It is key to note that this document will form part of the site-specific management system and therefore will be a live document. Details regarding waste acceptance, quarantine, storage and segregation are based on the waste streams that SUEZ expect to receive following the issue of the permit variation. As such, the document does not provide details for all of the proposed waste streams such as hazardous household chemicals.

However, in the event that the site is required to actively accept more of the proposed waste streams, SUEZ would ensure that appropriate measures are in place for the storage of these waste streams. In addition, SUEZ would update the Operations & Emissions Management Plan accordingly.

Q3b Management Plans

Clarify/ amend the following statement in the Operations & Emissions Management Plan:

- **4.5.1 refers to wood being tipped in a building; however there is no other reference in the application there is a building.**

No waste is being tipped in a building and therefore Section 4.5.1 of the Operations & Emissions Management Plan has been updated accordingly. A revised copy of the Operations & Emissions Management Plan (EP8, Section 1.2 – Version 2) is enclosed with this response.

- **It would be helpful if you resolve now the seeming inconsistency in 4.6.2 which refers to retaining putrescible wastes; however, elsewhere it is claimed no such wastes are accepted.**

Section 4.6 of the Operations & Emissions Management Plan has been updated to clarify that the site will accept potentially odourous waste including green waste and general waste. These waste streams are already permitted to be accepted at the site. The proposed waste codes refer to waste streams that are not considered to be odourous in nature and therefore are not addressed as part of Section 4.6 of the Operations & Emissions Management Plan.

We trust the above is satisfactory and allows you to proceed with the determination of the application. If you have any further questions, please do not hesitate to contact the undersigned.

Yours sincerely,



Alice Shaw
Environment Permit Manager
SUEZ Recycling and Recovery UK Ltd