

Preapplication Advice - EPR/AB3039DB/P001

Operator: Collins Earthworks Limited

Date: 15/09/2023

Query - The site wishes to add the mechanical treatment of road sweepings EWC 20 03 03 including washing and the treatment of the wash waters with flocculants. Also the removal of EWC codes no longer used and additional of a couple on nonhaz C&D codes.

I would like to know if the agency deems it necessary for noise and dust management plans to accompany the application.

Photographs and additional information received by email following telephone conversation.

### **Noise Screening**

We do not consider there would be a significant increase in noise risk from the proposed changes to the permit. The site is situated in an area with a lot of industrial activity and the proposed dewatering activity will be similar to the existing activities at the site and in keeping with the surrounding area.

As you are not proposing to increase your waste throughput or change the permitted area, we will not require you to submit a Noise Impact Assessment or Noise Management Plan with your application. If you already have a Noise Management Plan, Risk Assessment or Environmental Management Plan that consider noise, it would still be appropriate to update these documents.

Please ensure you include noise in the risk assessment you are required to submit with your application. You will need to explain why the proposed changes are unlikely to increase the noise risk at the site as per the reasoning above.

### **Dust Management.**

As you noted in your preapplication information, the waste outputs from the washing process may present an increased risk of dust emissions. With variations, we only look at the increase in risk from the proposed change in activities as the current activities were assessed with the original permit determination. We do not consider activities that have already been assessed as part of a previous application unless they are significantly changing.

The existing site operates as an inert and excavation waste transfer station, which is permitted to crush, sort and store a variety of potentially dusty wastes. The solid wastes resulting from the dewatering process are likely to be similar to be similar in nature to some of the finer types of aggregate or material produced by the current activities. Looking at the three most recent site inspection reports, our officers have had no concerns about dust emissions, how the waste piles were managed and I'm not aware of there being any complaints about the site.

On the basis that the tonnages at the site will not be changing, the nature of the wastes produced by the dewatering process and the mixed C&D wastes (17 09 04) will be similar to those already managed at the site, we would not expect a Dust Management Plan to be provided with the application.

It can often be beneficial to a site operator to have a formalised plan for managing dust in case conditions at the site change such as having a particularly dry summer, water shortages or changes in staff. Should dust emissions at the site become a problem, our compliance teams will require that a Dust Management Plan is produced and you will be charged by the hour them to assess it.

As with noise, we would expect consideration of dust risk to be included in a risk assessment submitted with a variation application. You should also include details of how any sludges/wet wastes will be contained prior to being dewatered.

If you do choose to submit a dust management plan, we can assess it with the usual fee of £1,241.

### **General advice regarding the application.**

Please ensure that you provide plans which show the surfacing and drainage for the site, particularly the areas where the new dewatering plant will be situated. We will expect confirmation that an appropriate discharge consent will be in place for any waters that will be discharged from the site.

Please be comprehensive in your assessment of the risks from the proposed activities and as previously stated, include consideration of risks you have ruled out and why.

Application Form part C4 includes a question regarding technical standards and appropriate measures. You will be expected to state which technical standards will be used. For the proposed activities, this is likely to be [Non-hazardous and inert waste: appropriate measures for permitted facilities - Guidance - GOV.UK \(www.gov.uk\)](#). Please read the notes in this section of the application form for how to justify deviation from the appropriate measures guidance or the use of alternative technical standards.

### **Wash Plants and Water Management.**

*Please note, the following is not an Environment Agency position on wash plants, it is some additional information intended to help with future applications.*

As previously discussed, there is a renewed focus on 'washing plant' permits within the Environment Agency. These are permits where water is used as an agent to chemically treat and/or separate waste materials such as soils, aggregates and plastics.

Your proposed activities would be considered a dewatering plant, as opposed to a washing plant, but there are some commonalities.

In permitting, we consider waste treatment by washing or dewatering to be a 'physical and chemical treatment' activity. This is reflected in how we charge for applications. A common mistake in applications is to assume the process is just the physical separation of the waste into components, but we consider the washing aspect to be chemical treatment,

especially when combined with the use of a flocculant. Please provide details of any products such as flocculants that may be added during the treatment process as some can be environmentally harmful.

We expect applications to consider the risks of contaminated water. For dewatering plants, this will be the water separated from the solids in the street cleaning residues and for washing plants, the wash water used within the plant to clean the waste.

We would expect the management of contaminated water to be covered in the Environmental Risk Assessment with any controls to prevent environmental harm from the contaminated water described.

For wash plants which have a closed loop system to reuse wash water, we are currently asking applicants to describe a process by which the suitability of the water will be assessed and how contaminated water will be tested, cleaned, reused, stored or ultimately disposed of. If the applicant is unable to provide this information with their application, (it can often require water samples from plant that is actively processing wastes), we are setting an improvement condition to provide a 'Wash Water Management Plan' within a certain timescale of the washing plant starting operations. I can't provide wording for this as it is specific for each application.