



NON-TECHNICAL SUMMARY

Think3E Consortium Ltd

Think 3e House

15-21 Links Road Finedon

Road Industrial Estate

Wellingborough

Northamptonshire

NN8 4EY

CONTENTS

1.0	INTRODUCTION.....	3
1.1	The Site	3
1.2	Current Environmental Permit.....	5
2.0	PROPOSED CHANGES.....	8
3.0	APPLICATION CONTENTS	9
3.1	Application Forms	9
3.2	Non-Technical Summary	9
3.3	Environmental Management System.....	9
3.4	Environmental Risk Assessment.....	10
3.5	Wamitab	10
3.6	Directors Information	10
3.7	Fire Prevention Plan.....	10
3.8	Operating Techniques	11
3.9	Site Condition Report.....	11
3.10	Pre-Application Advice	11
4.0	KEY TECHNICAL STANDARDS.....	11
5.0	CONCLUSION.....	12

1.0 Introduction

Think 3E Consortium Ltd (T3e) has instructed Olive Compliance Limited (Olive) to prepare an application to vary permit number: a EAWML EPR/BB3404KM for their site at:

Units 15 - 21, Links Road, Finedon Industrial Estate, Wellingborough, Northants, NN8 4EY

This non-technical summary provides a summary of the regulated facility, an explanation of exactly what is being applied for, and a summary of the key technical standards and control measures that will be implemented at the site as a result of the application.

1.1 The Site

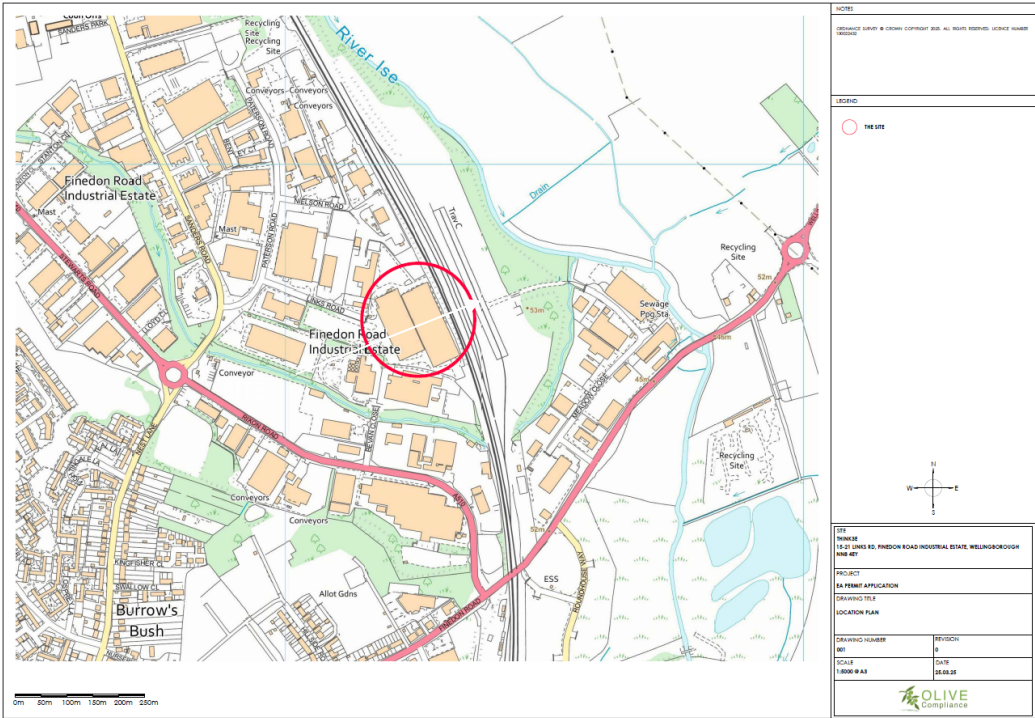
The site (centred at NGR SP 90221 69692) is located Think 3e House, 15-21 Links Road Finedon Road Industrial Estate, NN8 4EY. The site is principally bounded as detailed in Table 1 below.

Table 1: Site Setting

Boundary	Description
North	Commercial/Industrial
East	Railway Commercial/Industrial
South	Commercial/Industrial
West	Commercial/Industrial

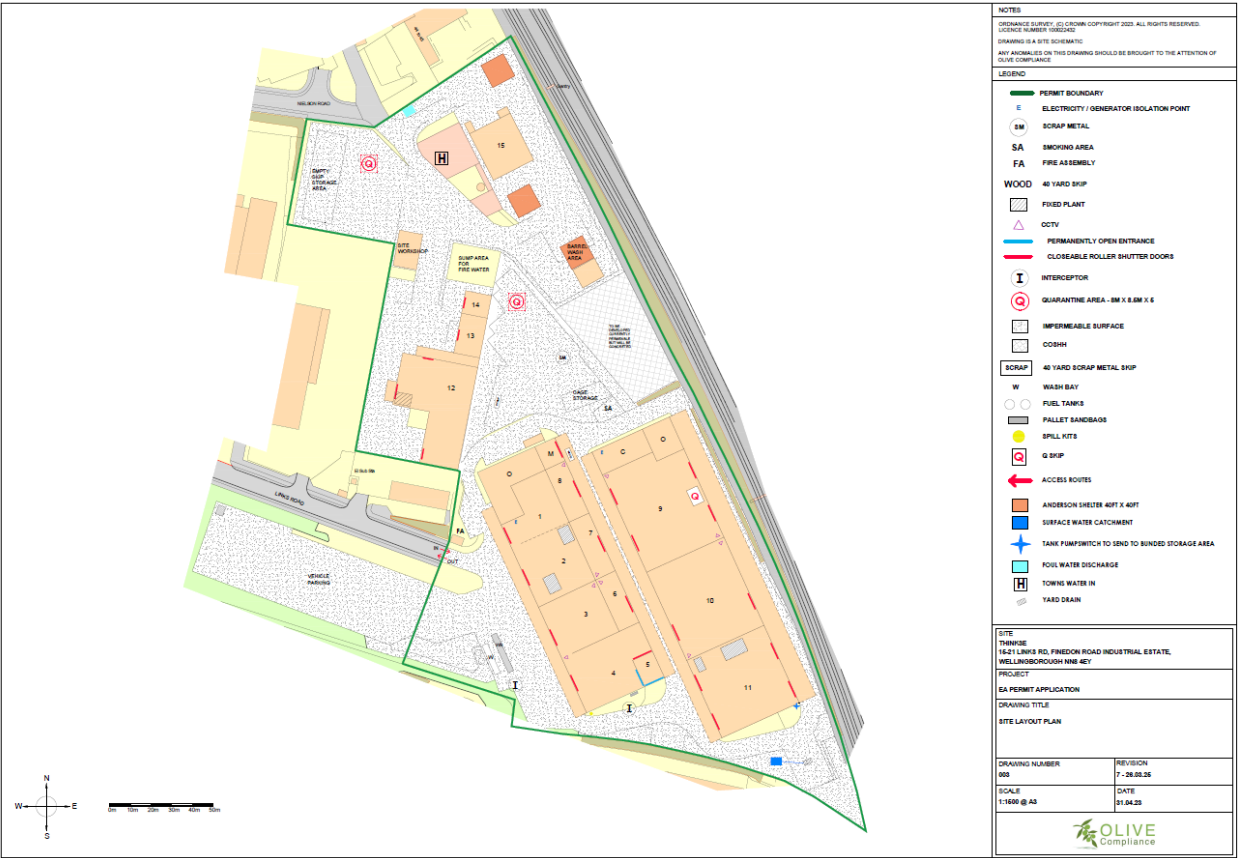
The site location and environmental site setting is shown below.

Figure 1 - Site Setting



Based upon the Ordnance Survey Map with the permission of the Controller of Her Majesty's Stationery Office ©Crown Copyright Olive Compliance Limited.

Figure 2 - Site Layout Plan



1.2 Current Environmental Permit

Waste operations at the site are currently authorised by a Tier 3 environmental permit (A09 : Hazardous Waste Transfer Station).

Permit Number BB3404KM

Exempt Activities:

[WEX390615](#) -

Exemptions

✓ S2

▶ [Storing waste in a secure place](#)

Registration date 18/12/2023

Expiry date 17/12/2026

✓ T1

▶ [Cleaning, washing, spraying or coating relevant waste](#)

Registration date 18/12/2023

Expiry date 17/12/2026

✓ T13

▶ [Treating waste food](#)

Registration date 18/12/2023

Expiry date 17/12/2026

✓ T4

▶ [Preparatory treatments \(baling, sorting, shredding etc\)](#)

Registration date 18/12/2023

Expiry date 17/12/2026

[WEX375834](#) –**T4**▶ [Preparatory treatments \(baling, sorting, shredding etc\)](#)**Registration date** 11/07/2023**Expiry date** 10/07/2026[WEX425685](#)**T13**▶ [Treating waste food](#)**Registration date** 30/12/2024**Expiry date** 26/01/2028

The site is made up of the existing site containing large buildings 1-11. The additional site adjacent has been purchased and the site offers additional buildings and fully contained impermeable bunded yard.

The facility operate a logistics transport facility and they service customers such as supermarket chains, the company bring materials back to the Think3E facility from stores for storage (in regards to shelving and display changes and café equipment) Much of this equipment is stored and then reused at a later date. However some of the materials are discarded at a later date and become waste.

T3E also bring back return loads of waste baled plastics and cardboard, or out of date good (food and non-perishables), returns and broken stock. - these materials usually come in via curtain sidars within stillages.

The materials in the curtain sidars are removed and routed to the designated area on site depending on what it is.

Food Waste is sent to building 4. Perishable material is de-packaged and loaded into a bulk trailer inside building 4. When full the trailer is moved into the yard and covered. The bulk trailer is then sent out to an AD facility. This activity is usually undertaken within 24hrs but is completed within 72hrs maximum.

None perishable dry goods/ material is stored for further processing in shed 3, 9, 12,13,14,15

Plastics are received in bales – these are split in shed 1 and re baled the bales are then stored in sheds 10,11,6,7 and stockpiled to form bulk loads and are then sent out for further reprocessing this is as part of a supply contract.

Card is received and baled in shed 1 and shed 2 - the bales are then stored in the canopy areas or in sheds 10,11,6,7 and stockpiled to form bulk loads and are then sent out for further reprocessing this is as part of a supply contract.

Think 3E also have customers who supply food wastes (which is egg shells and bread only) in barrels that are de-packaged and bulked up and sent out to an AD facility (this activity is done within 72 hrs for perishable items). This takes place in building the barrel wash Anderson shelter where the material is bulked up into a bulk trailer is then sent out to an AD facility .

The site has been operating with the site permit and registered exemptions to increase tonnage and allow for storage under the site canopies. The facility has also been awarded additional contracts with customers. The combination of bringing the Exempt activities and the additional contracts into the site has resulted in the need for additional capacity. With the new yard the capacity storage provision has been expanded.

Table 2: Permit History

Date	Status / Revision
30/06/2010	EPR/GP3092LF _ Surrendered 02/02/2011
24/12/2014	EPR/BB3404KM – Full Permit Transferred to Think 3E

Table 3: Permit Activities

Description of current activities for waste operations	Additional activity for waste operations TO BE ADDED
R13: Storage of waste pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced) R3: Recycling/reclamation of organic substances which are not used as solvents R4: Recycling/reclamation of metals and metal compounds	D9: Physico-chemical treatment not specified elsewhere which results in final compounds or mixtures which are discarded by means of any of the operations numbered D1 to D8 and D10 to D12. Drum Washing – This activity is undertaken in order to return the food waste drums to the customer for re use (for the same purpose). They are washed out prior to returning. And this is a DAA.

R5: Recycling/reclamation of other inorganic compounds D14: Repackaging prior to submission to any of the operations numbered D01 to D13 D15: Storage pending any of the operations numbered D01 to D14 (excluding temporary storage pending collection on the site where it is produced).	
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2.0 Proposed changes

The variation application seeks to make the following change only to the site's operations.

The variation application seeks to make the below change:

- Increase the site tonnage to 149,999 tonnes per year as the site throughput has increased therefore the facility has purchased the adjacent vacant site next door to provide additional storage of the Increase the permitted area. - The site has been operating with the site permit and registered exemptions to increase tonnage and allow for storage under the site canopies. The facility has also been awarded additional contracts with customers. The combination of bringing the Exempt activities and the additional contracts into the site has resulted in the need for additional capacity. With the new yard the capacity storage provision has been expanded.
- Addition of a drum washing facility to clean plastic packaging that is currently covered by Exemption T1 – current discharge via Discharge Consent to Sewer. This is a DAA as it is a requirement to empty and wash the drums prior to returning them to the customer for re use.
- Consolidate and bring upto modern standards permit 2010 permit transfer and variation 2014 variation as the permit has reference to building canopies and planning considerations that would not be found within a modern permit and are causing the site to be scored unnecessarily. The site has been forced to register exemptions to prevent the site being marked as noncompliant against the current historic permit conditions.
- Remove the EWC Code 16 02 12* for discarded equipment containing asbestos.
- Remove the EWC Code for 17 06 Codes Insulation Materials and asbestos containing construction materials 17 06 01*, 17 06 03*, 17 06 04, 17 06 05*).
- The facility is operated as a Hazardous Waste transfer station and is not currently undertaking treatment of WEEE or Fridges. Although the facility wishes to retain the treatment of WEEE EWC

codes (due to the fact that they remove batteries from WEEE equipment periodically if required to do so be a customer). The treatment of Refrigerated WEEE dose not take place so can be removed as an activity.

3.0 Application Contents

In view of the foregoing, the application comprises the following elements:

1. Application forms (Parts A, C2,C4 and F1);
2. Non-Technical Summary (NTS_T3E);
3. Drawings
4. Payment Confirmation
5. Management System (EMS_T3E);
6. FPP (FPP_T3E)
7. WAMITAB certification (TCM_T3E);
8. Site Condition Report (SCR_T3E); and
9. PreApplication Advice.
10. OMP
11. Pest Management Plan

Drawing list included within application

- | | |
|-----|-------------------|
| 001 | Location Plan |
| 002 | Permit Area |
| 003 | Site Layout |
| 004 | Receptor Plan |
| 005 | Site Drainage |
| 006 | Hydrant Locations |

3.1 Application Forms

Parts A, C2, C4 and F1 of the Environment Agency's application forms have been completed in support of the application and are enclosed as Section 1 of the application.

3.2 Non-Technical Summary

As part of the application this non-technical summary (NTS) is a concise document that provides a description of the application process should also provide an effective outline of all the key points set out in an Environmental Statement.

Waste acceptance Procedures, processing activities and resulting outputs are included as procedures within the IMS system.

3.3 Environmental Management System

Think3E operate their own in-house Quality Environmental Management System which ensures that:

- The risks that the activities pose to the environment are identified;
- The measures that are required to minimise the risks are identified;
- The activities are managed in accordance with the management system;
- Performance against the management system is audited at regular intervals; and
- The Environmental Permit is complied with.

A copy of the Company EMS is included as Section 3 of the application and a summary of the key technical standards for the management of the recycling facility is included in Section 4.0 of this non-technical summary.

As part of additional information required by the permitting officer clarification in relation to WEEE storage area was requested. The WEEE and batteries are stored within Shed 9

3.4 Environmental Risk Assessment

An Environmental Risk Assessment (ERA) has been undertaken and submitted with the permit variation application to assess and mitigate risks associated with the proposed changes on the site. There will be no point source emissions to groundwater, surface water or air resulting from the waste activity and neither will there be any site waste arising or global warming potential.

Therefore only 'Amenity and Accidents' remains applicable for assessment in this instance, and includes the consideration of odour, noise and vibration, fugitive emissions (including dust, mud, litter and pests) and accidents.

The ERA concludes that with the implementation of risk management measures, as described in the ERA, potential hazards from the facility are unlikely to be significant.

The Environmental Risk Assessment is included in Section 4 of this application.

3.5 Wamitab

Operations at the site will be under the overall 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.

Evidence of competence is supplied within the application in Section 5 of this application. Please note that the current WAMITAB Holder is registered for the Hazardous award and is nearing completion. It is expected that her award will be in place at the time of permit issue. Think3E will utilise a consultant TCM to cover the required TCM hrs until the site manager achieves her qualification and have therefore provided the covering consultants WAMITAB certificates.

3.6 Directors Information

Directors' information is supplied in Section 6 of this application.

3.7 Fire Prevention Plan

Subsequent to the variation application issued in 2019, an approved Fire Prevention Plan was submitted to the Environment Agency for approval. A copy of the updated FPP is included within Section 7 of this application, with confirmation of the EA approval email.

3.8 Operating Techniques

Think3E operate their own in-house management system which ensures that:

- The risks that the activities pose to the environment are identified;
- The measures that are required to minimise the risks are identified;
- The activities are managed in accordance with the management system;
- Performance against the management system is audited at regular intervals; and
- The Environmental Permit is complied with.

The Operating Techniques document is included in Section 8 of this application.

A separate Appropriate Measures document has been provided for WEEE including Batteries. The site layout drawing 003 has been updated to show the WEEE storage location (including battery storage)

3.9 Site Condition Report

As site condition report has been prepared in relation to the proposed changes. This is included within Section 9 of this application.

3.10 Pre-Application Advice

Preapplication advice was requested from the Environment Agency. Copies of all supporting Pre-App advice is included within Section 10 of the application.

4.0 Key Technical Standards

The key technical standards which will be employed to ensure that the proposed activities do not give rise to a significant environmental impact are summarised below:

- The Environmental Permitting (England and Wales) Regulations 2016;
- Develop a management system: environmental permits, February 2016;
- [Appropriate measures: Non-hazardous and inert waste for permitted facilities](#) 1st August 2023
- [Appropriate Measures Waste electrical and electronic equipment \(WEEE\): appropriate measures for permitted facilities](#) July 2022
- Control and monitor emissions for your environmental permit, February 2016;
- Fire prevention plans: environmental permits, January 2021;
- Risk assessments for your environmental permit, February 2016; and
- Sector Guidance Note S5.06: recovery and disposal of hazardous and non-hazardous waste, May 2013.
- Waste electrical and electronic equipment (WEEE): appropriate measures for permitted facilities 13 July 2022

In summary, the rules and operating procedures employed at the site will ensure that:

- All waste is managed in accordance with the Environmental Permit and legal requirements;
- The management and prevention of fires on site will be controlled via the Fire Prevention Procedure;
- The storage and treatment of waste is undertaken on impermeable surfacing with sealed drainage where applicable;
- Any tanks or containers used for the storage of any liquid fuel oil or other potentially polluting liquids/materials shall at all times be labelled as to the contents, and will be fit for purpose;
- Vehicles and plant will be appropriately maintained to ensure that operation will not give rise to unacceptable noise or vibration levels; and
- The risk of fugitive emissions (dust, noise, odour, pest and litter) is minimised;

Procedures are in place for the regular inspection and maintenance of storage areas and associated infrastructure, including site surfacing, drainage systems and containment measures.

Records will be maintained detailing any action taken to repair infrastructure and faults.

An Accident Management Plan (EMS003) is maintained and regularly reviewed to assess and minimise environmental risks and hazards of accidents and their consequences.

5.0 Conclusion

The overall conclusion from the studies undertaken in support of the permit variation application is that there is unlikely to be a significant environmental impact upon potentially sensitive receptors as a result of the proposed Environmental Permit variation.

Think3E Consortium Ltd is fully committed to ensuring the highest standards are met and will undertake its activities in a manner consistent with best industrial practices and with the implementation of the company's management system.