

Wellingborough Aggregate Recycling and HBM Facility

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# Non-Technical Summary for Environmental Permit

24<sup>th</sup> February 2023

## Non Technical Summary

The Day Group Limited propose to construct and operate an Incinerator Bottom Ash Recycling Facility at at Finedon Road Industrial Estate, Wellingborough, Northamptonshire NN8 4FT.

The Day Group Ltd is applying for an Environmental Permit to operate the new installation. This document is the non-technical summary accompanying the environmental permit application.

The site is located on land to the north of Don White Road on the Finedon Industrial Estate, Wellingborough. The accompanying Permit application Plan shows the site edged in green.. The centre of the site is found at the Ordnance Survey grid reference SP 89759 70651. The site is approximately 2.4ha in area and is formed of flat, managed grassland which has previously been made up in preparation for an industrial/commercial development.

The surrounding land uses consist of a mixture of B2 General industrial, B8 storage and/or distribution and Class E industrial processes. This includes a number of recycling and waste management facilities and an aggregates and wood recycling facility on Rixon Road. The site is accessed from Don White Road which adjoins Sanders Road and the wider road network.

The site comprises an enclosed square parcel of land bounded by a mature treeline to the north, the Midland Mainline railway to the east and the access road to the south. The land to the west slopes upwards forming a large embankment.

The site is located within Flood Zone 1 having a low probability of flooding, as indicated by Government mapping. The closest watercourse is the River Ise which is 140m to the east at its closest point. Much of this river corridor is located within Flood Zones 2 and 3 but this is separated from the site by the Midland Mainline railway which runs north south along the site's eastern boundary. The nearest residential receptor is a house located at Home Farm approximately 400m to the north-west.

There are no statutory ecological designations close to the site the nearest Site of Special Scientific Interest (SSSI) is Finedon Top Lodge Quarry and is located approximately 2.7km to the southeast. The site is located within the Nene Valley Nature Improvement Area and within 4km of the Upper Nene Valley Gravel Pits Special Protection Area (SPA).

The primary purpose of the proposed development is to process the raw incinerator bottom ash (IBA) to produce a recycled secondary aggregate - incinerator bottom ash aggregate (IBAA). The IBAA is separated

into different sized fractions and held in storage bays. The product can then be blended on site with primary aggregates to produce secondary aggregates to meet market demand. The process also involves ferrous and non-ferrous metal recovery from the IBA. This incinerator bottom ash metal is recycled off site.

The proposal also includes the installation of a Hydraulically Bound Mixtures plant, although that may not occur for some time after establishment of the IBA facility. The HBM process mixes IBAA with cement and water to produce a road building aggregate in a hydraulically bound form. Raw materials would be held in ground level storage bays and powdered material such as cement in sealed silos. The selected and sized IBAA is fed into the plant feeders with a loading shovel. Cement is added and the material is mixed by two sequenced rotary shafts. A small amount of water is added to the mix to induce the cementitious reaction. The material is then discharged directly into the delivery vehicles. This element of the process includes the management of cement, therefore, as has happened at other identical facilities this Part B operation will be Permitted by the Local Authority.

Day Group Ltd proposes recovery or a mix of recovery and disposal of non-hazardous waste with a capacity exceeding 75 tonnes per day involving the treatment of incinerator bottom ash. They propose an annual throughput of 200,000 tonnes per annum with the normal maximum volume of waste stored on site 15,5000 tonnes of raw IBA in storage building and the normal maximum amount of IBAA product and metals 20,000 tonnes. Daily throughout will be in the region of 1000 tonnes.

The application is also accompanied by an Environmental Risk Assessment which has been adapted from the ERA available for the Standard Rules Permit for processing IBA. The site is assessed at Planning stage, though the Environmental Impact Assessment process not to have any significant unmitigated impact on the environment or human health and the same conclusion has been reached in completion of the environmental risk assessment. Additionally the Permit submission requires inclusion of the ES prepared for planning, and full assessments are provided therefore of air quality, ecology, flood, surface water and others outside of Permitting. Although the operator has confirmed that there is no risk of unacceptable noise from the facility the Permitting process requires a BS4142 assessment to be provided with the Permit application to make it duly made. Additionally, although this assessment confirms no unacceptable risk, the duly making process requires submission of a Noise Management Plan even where no requirement has been identified through risk assessment. Therefore a NMP forms part of the EMS.

Conversely a detailed risk assessment is not required for air quality for the permitting process but a dust management plan will be required to ensure the application is duly made on receipt. The AQ assessment carried out through the assessment of environmental impacts confirms the site has no likely significant impacts, but a DMP also forms part of the EMS.

The ERA notes that the drainage arrangement for the site fall into three types, the IBA maturation building drains to a single contained point within the building, which will be emptied and disposed of as required. The IBAA storage are drains to a settlement pit and associated storage tanks, that will be used as dust management on the site. No discharge from this area to sewer is proposed, although this may be reviewed in the future. The remainder of the site, will discharge to foul or surface water sewers as appropriate. A drainage drawing accompanies the application for clarity.

The site will be operated under a comprehensive management system which, in addition to incorporating the waste acceptance procedures, will minimise the risk of pollution from the site operations including any accidents, or non-conformances. The EMS accompanying this application replicates as far as possible the agreed measures and procedures for the Day Group IBA recycling facilities at Avonmouth, Brentford and Greenwich, as well as Salfords, which is not yet operational, but is the most recently permitted site.

The EMS includes noise and air quality management plans that have also drawn on the extensive discussions around the Avonmouth Permit, the most recent BREF and on going operational experience as well as the site specifics of this site.

A specific odour management plan has not been provided as IBA nor IBAA provide any significant source of odour do not require any more detailed measures than are addressed in the EMS. This has been agreed with the EA at other IBA processing facilities with much closer sensitive receptors. has previously been agreed for other identical IBA processing plants that specific fire prevention plans are not required as the already combusted and damp ash has sch a low risk of fire. The incoming ash is damp on arrival as a result of the quenching process at source, with a moisture content of ~18%. A FPP has not been required at the last IBA plant the applicant had permitted. The nature of the materials, as an ash mean they are not susceptible to combustion. IBA is not listed as a combustible waste in the guidance on when an FPP is needed

Technical competence certificates for Mark Norris and Michael Woodward accompany the application, but note it is the intention that once the site development commences a dedicated manager will be appointed, who will have the appropriate WAMITAB qualifications for the operations.

There are no site contact details available as yet to include on the application form. Form B3, q3 has been completed with Sector Guidance note added as previously advised was required along with the EMS to make the form duly made.

**Appendix to Form B2 Q3 on TCM**

In addition Michael Woodward's COTC and continuing competency certificates accompany this application. – It is noted that since submission of the application in May 2022, this has expired, but Mark's remains valid and only one is required for the duly making process.

He is one of the current TCM for the following facilities:

BB3232RX	Brentford	TW8 9HF
YP3595VG	Newhaven	BN9 0AB

Mark Norris DoB [REDACTED].

Michael Woodward DoB [REDACTED]