

Non Technical Summary

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SENECA MATERIALS RECOVERY FACILITY

This Non-Technical Summary supports a variation to the existing Environmental Permit (EPR/PP3496EU) operated by Seneca Environmental Solutions Ltd at Unit 2 Hannah Close, Neasden. Seneca Environmental Solutions Ltd is part of Carey Group PLC.

The materials recovery facility (MRF) is a recovery, processing and transfer facility accepting a broad range of waste streams. The facility operates a number of activities:

- A1: Section 5.4 A(1)(b)(ii) recovery of non-hazardous waste exceeding 75 tonnes pe day involving pre-treatment of waste for incineration or co-incineration;
- A2: Storage and treatment of non-hazardous waste for recovery (R3, R4, R5 and R13); and
- A3: Bulking up and storage of hazardous waste for disposal (D14 and D15).

The waste recovery processes include a picking line, manual segregation, size reduction through screening, shredding and crushing and compacting. Residual recovered materials are compacted and sent for further recovery. Some products are baled to facilitate transport. Hazardous wastes are limited to Asbestos Containing Materials. Formerly, the output from the non-hazardous processing has solely been transferred for onward recovery, where operational levels showed recovery at 99%. A considerable proportion of the recovered product is comprised of Refuse Derived Fuel (RDF).

Site operations are currently suspended following a downturn in the RDF market generated by Brexit and by COVID-19. In the current climate, continuation of the recovery operations with the RDF being transferred to Europe is no longer considered viable for at least the next 12 to 24 months. This variation application is to permit the site to process and transfer to other outlets including those treated as disposal (i.e. non R1 incinerators and local landfills).

The variation is to add an installation activity to the permit and also disposal codes D14 and D15. The variation includes:

- addition of installation activity Section 5.4 A(1)(a)(iii) pre-treatment for waste for incineration; and
- The addition of D14 and D15 codes to the A1 and A2 activities listed in the permit, enabling the bulking up and transfer of mixed waste to alternative non-recovery-based outlets.

This application does not alter the approved site operations, the treatment processes or the waste types received. The application is limited to the inclusion of the disposal activities which extends the type of outlets that waste can be transferred to. Additional outlets include incineration (non-R1 compliant operations) and local landfills. This permit variation is limited to an amendment of Table S1.1. The proposed table is presented overleaf.

The Fugitive Emissions Plan, Odour Management Plan and Fire Prevention Plan are not changed by this variation with only the final dispatch of waste being modified. To include the change in type of outlets, there is an amendment to the Operational Management Plan.

The management plans presented are the most up to date taken from the certified accredited management systems. The amendments do not impact upon the current site condition from the activities previously agreed.

There has been correspondence with the Environment Agency regarding this proposal and a Local Enforcement Position has been granted for the treatment of waste prior to incineration (at non-R1 facilities). The Local Enforcement Position is attached in this permit and runs until the 30th April 2020 or when this Permit variation is approved (whichever is sooner).

In terms of the specific amendments to the Schedule 1, the proposed amendment to the activities are presented in Table 1.1. below. The proposed changes are highlighted in yellow.

Schedule Table 1.1			
Activity reference	Activity listed in Schedule 1 of the EP Regulations	Description of specified activity and WFD Annex I and II operations	Limits of specified activity and waste types
A1	S5.4 A(1)(b)(ii) S5.4 A(1)(a)(iii)	Recovery or a mix of recovery and disposal of non-hazardous waste with a capacity exceeding 75 tonnes per day involving pre-treatment of waste for incineration or co-incineration. Disposal of non-hazardous waste with a capacity exceeding 50 tonnes per day involving the pre-treatment of waste for incineration. R3: Recycling/reclamation of organic substances which are not used as solvents R4: Recycling/reclamation of metals and metal compounds R5: Recycling/reclamation of other inorganic compounds 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) D14: Repackaging prior to submission to any of the operations numbered D1 to D13 D15: Storage pending any of the operations numbered D1 to D14.	Waste types and quantities as specified in table S2.2. A combined total of no more than 399,000 tonnes of non-hazardous waste per year for activities A1 and A2. Non-hazardous waste with putrescible content and/or waste with a potential for odour shall not exceed 150,000 tonnes per year. Waste used for refuse derived fuel (RDF) shall be processed and baled within 24 hours of acceptance onto the site and shall be removed within 48 hours of acceptance onto the site or as otherwise agreed in writing with the Environment Agency. The residual organic fines generated by the processing shall also be removed within this period. Treatment operations shall be limited to physical treatment including screening, crushing, baling and shredding for the purpose of recovery.
A2	Storage and treatment of non-hazardous waste for recovery or a mix of recovery and disposal of non-hazardous waste. R3: Recycling/reclamation of organic substances which are not used as solvents. R4: Recycling/reclamation of metals and metal compounds. R5: Recycling/reclamation of other inorganic compounds. R13: Storage of waste pending any of the operations numbered R1 to R13 (excluding temporary storage, pending collection, on the site where it is produced). D14: Repackaging prior to submission to any of the operations numbered D1 to D13. D15: Storage pending any of the operations numbered D1 to D14.		A combined total of no more than 399,000 tonnes of non-hazardous waste per year for activities A1 and A2. Waste types and quantities as specified in table S2.3. Treatment operations shall be limited to physical treatment including screening, crushing, baling and shredding for the purpose of recovery. No more than a total of 50 tonnes of intact and shredded waste vehicle tyres (waste codes 16 01 03 and 19 12 04) shall be stored at the site.
A3	Bulking up and storage of hazardous waste for disposal. 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).		The maximum quantity of hazardous waste received at the site shall not exceed 10 tonnes per day. The maximum quantity of hazardous waste stored at the site shall not exceed 10 tonnes. Waste types as specified in table S2.4. Total of no more than 1,000 tonnes per year of hazardous waste shall be received at the site.

Seneca Environmental Solutions Limited
Carey House
Great Central Way
Wembley
Middlesex
HA9 0HR

Date: 10 August 2020

Ref: EPR/PP3496EU

Company No 06773750

Dear Sir/Madam

Environmental Permitting (England and Wales) Regulations 2016.
Regulated Facility: Seneca Environmental Solutions Limited, Unit 2, Hannah Close,
Great Central Way, Neasden, London, NW10 0UX
Environmental permit EPR/PP3496EU

Temporary Local Enforcement Position

I refer to your email of 23 July 2020 and document titled "Local Enforcement Position Request" dated July 2020. In this document you have stated that you are having difficulties finding suitable outlets for your transfrontier waste shipments as a result of the UK exit from the European Union and this, combined with COVID 19, has caused the operations at your regulated facility to temporarily cease.

This is principally because your environmental permit limits the transfer of treated waste to recovery outlets and does not allow for wastes to be sent to disposal outlets. You have informed us that you are therefore intending to apply to vary the current permit to include D14 and D15 activities to those activities permitted within A1 and A2 of Table S1.1 of Schedule 1. The variation will allow for the transfer of pre-treated non-hazardous waste to a wider range of outlets such as landfill or incinerator.

I have to inform you that adding these activities to your current permit is not possible in the manner that you have requested. The reality of the situation is that these categories will cause you to fall into another category of installation as defined in Schedule 1 of EPR.

Specifically it will mean that your installation must be regulated as both a Section 5.4A(1) (b)(ii) activity as well as one authorised under either Section 5.4A(1) (a or b). Your permit will therefore need to be varied to include these new activities.

As there is a potential delay of several months for determining and issuing a permit variation, you are requesting to cover this gap with a local enforcement position.

Transferring waste to disposal outlets without the inclusion of the appropriate activity codes on your permit would amount to a contravention of Regulation 38 of EPR.

However, the Environment Agency has considered the particulars of this case and will not take enforcement action where all the following conditions are met;

- The regulated facility shall be operated as if it has the activity identified in EPR Schedule 1: Section 5.4A(1) **(a) (iii)** , that is, *Part A(1) (a) Disposal of non-hazardous waste with a capacity exceeding 50 tonnes per day (or 100 tonnes per day if the only waste treatment activity is anaerobic digestion) involving one or more of the following activities, and excluding activities covered by Council Directive 91/271/EEC concerning urban waste-water treatment (iii) pre-treatment waste for incineration or co-incineration ONLY*, in addition to Section 5.4A(1) (b)(ii) which is already in the permit.
- There shall be no other deviation from all other existing conditions of environmental permit EPR/PP3396EU except for the disapplication of the time limits imposed to processing and baling of RDF solely where the waste is to be transferred for disposal.
- You shall submit an application to vary the environmental permit to include relevant activities authorised under Section 5.4A to the Environment Agency by 28 August 2020
- The extended specified activities shall not cause or be likely to cause pollution of the environment or harm to human health.

This enforcement position will remain in place until whichever of the following occurs first;

- 23.59 hrs 30 April 2021, or
- A variation to environmental permit EPR/ PP3396EU to include D14 and D15 activities to those activities permitted within A1 and A2 of Table S1.1 of Schedule 1 is issued.

This enforcement position is specific to Seneca Environmental Solutions Limited, Unit 2, Hannah Close, Great Central Way, Neasden, London, NW10 0UX.

Please note that this enforcement position is independent of any permit decision process and cannot be relied upon as an indicator of any final decision in relation to any such application.

We reserve the right to withdraw the enforcement position at any time subject to providing reasonable notice to you in writing of such a withdrawal. If, however, you do not comply with the conditions within this letter or if we consider that the activities are likely to cause pollution of the environment or harm to human health or if such pollution or harm occurs, then the enforcement position no longer applies and will be withdrawn immediately and enforcement action may be taken.

The Environment Agency's normal enforcement procedures will apply in relation to any breaches of all other existing permit conditions.

If you wish to discuss this letter please contact Rayhela Ahmed-Monju on 02030259140.

Yours faithfully



Mr. Alex Chown
Area Environment Manager
Hertfordshire and North London

Email: alex.chown@environment-agency.gov.uk