

NON-TECHNICAL SUMMARY

Recycling Lives Recycling Park, Longridge Road, Preston PR2 5BX

Recycling Lives Ltd

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Oaktree Environmental Ltd

Waste, Planning & Environmental Consultants



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1.2	10/05/2019	CP	RLL	Application copy
1.3	26/03/2020	CP	RLL	Variation application copy
1.4	10/11/2020	CP	RLL	Updated to match V007 docs and risk associated with increasing throughput of A1 – A3 (frag)

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1 Introduction

1.1 Note

1.1.1 This Non-Technical Summary (NTS) accompanies an application for a variation of EPR/EP3595SK which is operated by Recycling Lives Ltd. The Environmental Permit is situated at Recycling Lives Recycling Park, Longridge Road, Preston PR2 5BX. The site currently processes 440,000 tonnes of waste per annum. The facility operates a metal shredder (fragmentiser) with a capacity of more than 75 tonnes per day, the activity falls under the Industrial Emissions Directive below table details status log of the permit:

- S5.4 A(1) (b) (iv) Recovery or a mix of recovery and disposal of non-hazardous waste with a capacity exceeding 75 tonnes per day involving treatment in shredders of metal waste, including waste electrical and electronic equipment and end-of-life vehicles and their components.
- S5.3 Part A(1), (ii) activity; physico-chemical treatment of hazardous waste with a capacity exceeding 10 tonnes per day comprising the physical treatment of flat panel display WEEE equipment

1.1.2 All other waste operations on site include the following:

- End-of-Life Vehicle (ELV) storage depollution and dismantling (authorised treatment) facility;
- WEEE storage and treatment facility;
- Metal recycling facility; and,
- Waste transfer station.

1.2 Permit status log

1.2.1 The status log of a permit sets out the permitting history, including any changes to the permit reference number.

Table 1.1 – Status log of permit

Status log of the permit		
Description	Date	Comments
Permit determined EPR/EP3595SK (EAWML 101161)	20/08/2010	Permit for material recycling facility issued to Recycling Lives Limited.
Permit amended EPR/EP3595SK	02/11/2010	Permit address amended.
Variation determined EPR/EP3595SKIV002	06/03/2014	Permit varied to add a waste code, improve condition and approved odour management plan.
Variation determined EPR/EP3595SKN003	26/08/2014	Variation and consolidation of permit to change the fragmentising of metal wastes from a waste activity to an installation as a result of the IED changes to the EP regulations.
Agency initiated variation determined EPR/EP3595SK Billing Reference: Installation - MP3838YM Waste- EAWML 101161	26/07/2018	Varied, updated and consolidated permit issued in modern condition format.
Variation determined EPR/EP3595SK	19/08/20	Varied permit issued

1.2.2 The proposed variation is required due to the ongoing expansion of the company and the required need for increased recycling targets for ELV, scrap metal and WEEE and the application proposals are clearly set out in the next section overleaf.

2 Application proposals

2.1 Variation proposals

2.1.1 The proposed variations to this permit are clearly set out below:

- i) Addition (substantial variation) of Section 5.3 Part A(1), (ii) activity; physico-chemical treatment of hazardous waste with a capacity exceeding 10 tonnes per day comprising the shredding of hazardous WEEE which could contain Persistent Organic Pollutants (POPs).
- ii) Addition of Section 5.6 Part A(1); (a); Temporary storage of hazardous waste with a total capacity exceeding 50 tonnes pending any of the activities listed in Sections 5.1, 5.2, 5.3 comprising the storage of <1,000 tonnes of hazardous WEEE containing POPs (EWC codes 16 02 15* and 19 02 04*).
- iii) Substantial variation to Hazardous Waste Treatment ('New Activity' of density separation of wastes – S5.3 a(ii) Activity)
- iv) Substantial variation of S5.4 A1 (b) (iv) Non-hazardous 'shredding' S5.4 A(1) (b) (iv) Recovery or a mix of recovery and disposal of non-hazardous waste.

2.1.2 In summary the site changes include the:

- Installation of new shredder for WEEE containing Persistent Organic Pollutants (POPs) and other plastics located in the external yard area as shown on Drawing No. RLRP/1040/03;
- Installation of a wash plant for further separation of frag waste [Automotive Shredder Residue (ASR)] for recovery which is located in the building as shown on the same drawing;
- Installation of a proposed media separation tank to densify plastic polymers using a sink / float system to further recover plastics which will be located inside the same building; and,
- Increase in the total quantity of waste accepted under Activities A1 – A3 of the permit 450,000 tonnes per year. By this change the total annual throughput of

waste at the site will increase from 610,000 tonnes per year to 760,000 tonnes per year.

- 2.1.3 The increase of throughput arising from the A1 – A3 activity will also require amendments to the agreed operational hours previously permitted in Document Ref. RLRP-1040-I (Noise & Vibration Management Plan).

3 Types of activities

3.1 The table below makes reference to Table 1a - Types of activities from Application Form Part C3 which are proposed as part of this variation

Table 3.1 – Table 1 – Changes to existing activities (EPC2 – Page 3)

Installation Name	Schedule 1 References	Description of the Activity	Activity capacity	Annex II (R codes)	Hazardous waste treatment capacity	Non-hazardous waste treatment capacity
Recycling Lives Recycling Park EPR/EP3595SK	S5.3 (1) (b) (iv)	Recovery or a mix of recovery and disposal of non-hazardous waste with a capacity exceeding 75 tonnes per day involving treatment in shredders of metal waste, including waste electrical and electronic equipment and-of- life vehicles and their components.	1,000 tonnes	R3, R4, R5	1,000 tonnes / day	1,000 tonnes / day
Recycling Lives Recycling Park EPR/EP3595SK	S5.3 (a) (ii)	Physico-chemical treatment of hazardous waste with a capacity exceeding 10 tonnes per day involving one or more of the following activities	1,000 tonnes	R3, R4, R5	1,000 tonnes / day	1,000 tonnes / day
Recycling Lives Recycling Park EPR/EP3595SK	S5.4 (b) (iv)	Recovery or a mix of recovery and disposal of non-hazardous waste with a capacity exceeding 75 tonnes per day involving treatment in shredders of metal waste, including waste electrical and electronic equipment and-of- life vehicles and their components.	1,800 tonnes	R3, R4, R5	N/A	1,800 tonnes / day
Directly Associated activities						
Recycling Lives Recycling Park EPR/EP3595SK	S5.6 A (1) (a)	Temporary storage of hazardous waste with a total capacity exceeding 50 tonnes pending any of the activities listed in Sections 5.1, 5.2, 5.3 and paragraph (b) of this Section, except-- (i) temporary storage, pending collection, on the site where the waste is generated, or (ii) activities falling within Section 5.2.	2,000 tonnes	R3, R4, R5, D15	N/A	N/A
TOTAL			3,800 tonnes		1,000 tonnes / day	1,800 tonnes / day

4 Proposed EWC codes

4.1 EWC codes in relation to the shredding of WEEE containing POPs are included under S2.4 (Activity A7) of the permit and will comprise mainly the following:

- 16 02 15* - hazardous components removed from discarded equipment i.e. plastic casings removed from FPDs.
- 16 02 16 - components removed from discarded equipment other than those mentioned in 16 02 15
- 20 01 35* - discarded electrical and electronic equipment other than those mentioned in 20 01 21 and 20 01 23 containing hazardous components (6)
- 20 01 36 - discarded electrical and electronic equipment other than those mentioned in 20 01 21, 20 01 23 and 20 01 35

4.2 The site will also use the new shredder for the treatment of other plastics which will have been separated from on site from other wastes i.e. ELVs, scrap metal and will comprise the following:

- 16 01 19 – plastic removed from ELVs
- 19 12 04 – plastic and rubber i.e. baled plastic arising from non-hazardous waste
- 19 02 04* - premixed wastes composed of at least one hazardous waste (treated small mixed WEEE)

5 Documentation and fees

- 5.1 Recycling Lives Ltd have sought guidance from the Environment Agency using pre-application advice (EPR/EP3595SK/V006) which is shown in Appendix I of this NTS.
- 5.2 Oaktree Environmental Ltd have looked through the advice and noticed some slight changes are required in addition to the new activities. The following table sets out the fees required for the application.

Table 5.1 – Base Application Fee Table

EPR Charging Scheme Ref	EPR Charging Scheme Ref & Description	Type of application (Ref)	Fee
1.16.1.2	Section 5.3 (a)(ii) - hazardous waste installation – physico-chemical treatment (shredding)	<i>Substantial variation</i>	£14,401
1.16.4	Section 5.6 - temporary or underground storage of hazardous waste.	10% incidental storage	£4,056
1.16.1.2	Section 5.3 (a)(ii) - hazardous waste installation – physico-chemical treatment (density separation/washing)	<i>Substantial variation</i>	£14,401
1.16.2.5	Section 5.4 (a)(v) and (b)(iv) – treatment in shredders of metal waste	<i>Substantial variation</i>	£12,586
1.19	Charges for other assessments, Fire, Dust, Noise	Assessments	£3,728
		TOTAL	£49,172

- 5.3 It must be noted £36,586 of this fee has already been paid.
- 5.4 it is not considered that a Habitats Assessment is necessary as the impacts surrounding this would have been assessed under application ref. EPR/EP3595SK/V006.
- 5.5 It considered that no new impacts will arise in relation to sensitive sites which require an additional assessment.
- 5.6 The table overleaf summarises which parts of the application forms request the above documentation which would normally be completed in Application Form Part F1; Section 6.

Table 5.2 – Application Form Reference Table

Application Form	Question Ref	Page No.	Document Ref
Part A	5c	2	RLRP-1040_Director_Info
Part C2	2b & Table 1	2 & 3	RLRP-1040-C
Part C2	3	5	RLRP-1040-G
Part C2	3d	6	RLRP-1040-A
Part C2	4a	6	RLRP-1040-B (Appendix III)
Part C2	5a	7	RLRP/1040/01, RLRP/1040/02, RLRP/1040/03, RLRP/1040/04 – also found in Appendices of main documentation
Part C2	5c	7	RLRP-1040-C
Part C2	5d	7	RLRP-1040-B
Part C2	5e	7	RLRP-1040-B
Part C2	5f	7	RLRP-1040-C
Part C2	6	7	RLRP-1040-D
Part C3	1	1 & 2	RLRP-1040-C
Part C3	Table 1b	3	RLRP-1040-C
Part C3	2 – Table 2	3 & 4	Already shown in Permit – Tables S3.1 - S3.3; Pages 37 & 38 + RLRP-1040-J & RLRP-1040-L
Part C3	3 - Table 3	5	RLRP-1040-J
Part C3	3a1	5	RLRP-1040-J
Part C3	3b - Table 4	5	RLRP-1040-L & RLRP-1040-I
Part C3	3c – Table 5	6	RLRP-1040-J
Part C3	4a	6	RLRP-1040-H, RLRP-1040-J & RLRP-1040-L
Part C3	4b	6	RLRP-1040-L
Part C3	6a – 6e	7	RLRP-1040-J
Part C3	Appendix 5: 1	14	RLRP-1040-J
Part C3	Appendix 5: 2	14	RLRP/1040/03
Part C4	1 & Table 1a	1 & 2	RLRP-1040-C
Part C4	1 & Table 2	3 & 4	RLRP-1040-L & RLRP-1040-B (Appendix III)
Part C4	3a	5	RLRP-1040-C
Part C4	3b	5	See Form C3
Part C4	4a & 4b	5	RLRP-1040-H, RLRP-1040-J & RLRP-1040-L
Part C4	Appendix 2; 1 -2	8	RLRP-1040-J & RLRP/1040/03
Part F1	1 (Table 2)	1	RLRP-1040-C
Part F1	6	7	RLRP-1040-C
N/A	N/A	N/A	RLRP-1040-M (Abatement Letter)

6 BAT Summary

6.1 Energy efficiency

6.1.1 The site has objectives to save energy at all times and operate in as energy efficient manner as possible. The bulking and compaction operations minimise travel for the wastes. The site has a separate repair and blasting workshop to ensure skips can be repaired and re-furbished rather than scrapped.

6.1.2 The company is committed to using the most efficient equipment as this is usually the most cost effective.

6.2 Use of Raw Materials Including Water

6.2.1 The use of raw materials is quite limited fuel and lubricants for the mobile plant, water for the frag and wipes and rags for general cleaning.

6.2.2 Water use is predominantly for the frag and the operator will explore the viability of harvesting rainwater for use in the plant.

6.3 Reduction of Waste

6.3.1 The company is committed to reducing waste the company provides a service to ensure small volume difficult to handle wastes are recovered/recycled or disposed of as efficiently as possible.

6.3.2 The company is also committed to providing a service to customers which reduces the road miles per tonne for wastes by providing intermediate facilities for treating and bulking wastes.

7 Abatement

- 7.1 A request for the abatement of applications fees has been submitted alongside this permit application. Please refer to document. RLRP-1040-M.

Appendix I

Pre-application advice



Chris Parry
Recycling Lives Centre
Essex Street
Preston
Lancashire
PR1 1QE

Our Ref: EA/EPR/EP3595SK/V007
Date: 31 January 2020

Dear Chris

**Pre application advice – Basic service
Recycling Live Ltd**

Following your pre-application request dated 21/01/2020 we have the following advice:

You will need to submit the following forms. Please ensure you download the latest version of the forms, as your application will be returned if an old version of the forms is used:

Form A:

<https://www.gov.uk/government/publications/application-for-an-environmental-permit-part-a-about-you>

Form C2:

<https://www.gov.uk/government/publications/application-for-an-environmental-permit-part-c2-varying-a-bespoke-permit>

Form C3:

<https://www.gov.uk/government/publications/application-for-an-environmental-permit-part-c3-varying-a-bespoke-installation-permit>

Form F1:

<https://www.gov.uk/government/publications/application-for-an-environmental-permit-part-f1-opra-charges-declarations>

Please provide these additional documents / supporting information:

Non-Technical Summary:

You need to send us a simple explanation of what the activities or changes are. This should include a summary your operations, a summary of the key technical standards and control measures arising from your risk assessment.

Environmental Risk Assessment:

You should describe the environmental risk posed by your proposals. This must take the form of an environmental risk assessment which should follow the methodology set out in 'Risk assessments for your environmental permit' at www.gov.uk/government/organisations/environment-agency

Depending on the outcome of your initial environmental assessment, you may be required to undertake detailed modelling of your environmental risk.

If appropriate, you will need to assess the risk of emissions to air using the methodology in this guidance <https://www.gov.uk/guidance/air-emissions-risk-assessment-for-your-environmental-permit>

You must carry out detailed modelling assessment on any emissions that you didn't screen out through your air emissions risk assessment. Your modelling report needs to follow this guidance <https://www.gov.uk/guidance/environmental-permitting-air-dispersion-modelling-reports>

You must assess the risk of hazardous pollutants to surface water, you need to follow this guidance: <https://www.gov.uk/guidance/surface-water-pollution-risk-assessment-for-your-environmental-permit>

If you need to undertake detailed modelling of the risk to surface water you should follow this methodology <https://www.gov.uk/government/publications/modelling-surface-water-pollution-risk-assessment>

If you need to assess the risk to groundwater you should follow this methodology <https://www.gov.uk/guidance/groundwater-risk-assessment-for-your-environmental-permit>

Site Plan:

You must send us a site plan that identifies all of the land on which your activities take place. The site plan should provide a date and a reference and must be drawn accurately to a defined scale. The outline of the site must be clearly marked. It will be helpful if local features are shown on the plan to help us place the site in its local environment.

If you are sending us a paper copy of your site plan it must be either A3 or A4 size. Alternatively you can send us an electronic copy on CD or via email.

Include suitable layout plans labelled to identify emission points, raw material storage, waste storage tanks/bays/areas by waste type and storage capacity.

Technical Competence:

You will need to send in evidence of appropriate technical competence. You need to include certificates: <https://www.gov.uk/guidance/legal-operator-and-competence-requirements-environmental-permits>

Technical Description and BAT assessment:

You will need to provide a technical description of the changes you propose to make, detailing any changes to plant, equipment and infrastructure, including design capacities. You must demonstrate how you will meet any relevant Best Available Techniques. This should include consideration for any relevant Directives, such as Waste Framework Directive (WFD): <https://www.gov.uk/guidance/best-available-techniques-environmental-permits>

Provide details of your operating techniques and the infrastructure you are using to minimise the risk of pollution, including any details of secondary containment (e.g. bunds) used and how this meets any relevant standards. Further guidance on this can be found at:

<https://www.gov.uk/guidance/pollution-prevention-for-businesses#storing-materials-products-and-waste>

The sector guidance for waste treatment S5.06:

<https://www.gov.uk/government/publications/sector-guidance-note-s506-recovery-and-disposal-of-hazardous-and-non-hazardous-waste>

Consider the requirements of the waste treatments BREF:

https://eippcb.jrc.ec.europa.eu/sites/default/files/2020-01/JRC118637_WI_Bref_2019_published_0.pdf

Odour Management Plan:

If your risk assessment concludes that as a result of the proposed changes an odour management plan is required you should submit an OMP in accordance with the H4 guidance on our website:

<https://www.gov.uk/guidance/control-and-monitor-emissions-for-your-environmental-permit#odour>.

Noise Impact Assessment

Unless it can be demonstrated that the proposed changes are low risk you will need to send in a noise impact assessment with your application. You should follow the H3 guidance on our website as well as the requirements noise:

<https://www.gov.uk/government/publications/environmental-permitting-h3-part-2-noise-assessment-and-control>

<https://www.gov.uk/government/publications/noise-impact-assessment-information-requirements>

Noise and Vibration Management Plan:

If your risk assessment shows that your proposed changes will cause noise beyond your site boundary you will need to send in a noise and vibration management plan with your application. You should follow the H3 guidance on our website:

<https://www.gov.uk/government/publications/environmental-permitting-h3-part-2-noise-assessment-and-control>

If you already have a noise management plan we would expect you to review the plan to take account of the changes proposed.

Habitats Assessment

A conservations screening, report and maps are attached, you will need to consider if a habitats risk assessment is required for this variation.

Additional information

As there is already an application in determination the charging may change if this is issued prior to the new variation being submitted. If the current application EPR/EP3595SK/V006 is determined and granted then the fee to add activities which are already included on a permit require a substantial variation charge rather than a new activity charge. However, as it is likely you will submit this variation prior to the determination of the first variation the fees are as follows for new activities.

The application fee is based on the following charges form our Charging Scheme:

Ref.	Activity	Cost
1.16.1.2	Seciton 5.3 (a)(ii) – hazardous waste installation – physico-chemical treatment.	£16,001
1.16.4	Seciton 5.6 – temporary or underground storage of hazardous waste.	£1,352 (10% £13,159)
1.16.12	Physical treatment of non-hazardous waste	£7,930
1.19.3	Fire Prevention Plan	£1,241
1.19.5	Dust Management Plan	£1,241
1.19.7	Noise & Vibration Management Plan	£1,246
		£29,011 (total)
The application charge may also need any of the following plans or assessments in addition to the charges shown above		
1.19.2	Habitats Assessment	£779

Link: <https://www.gov.uk/government/publications/environmental-permitting-charging-scheme-2019>

Disclaimer

The advice given is based on the information you have provided, and does not constitute a formal response or decision of the Environment Agency with regard to future permit applications. Any views or opinions expressed are without prejudice to the Environment Agency's formal consideration of any application. Please note that any application is subject to a full technical check during duly making and determination, and additional information may be required based on your detailed submission and site specific requirements.

This advice cover Installations only. Other permissions from the Environment Agency and/or other bodies may be required for associated or other activities.'

When you're ready to submit your application please quote the above reference number.

What happens next?

This pre-application request is now closed. Further enquiries resulting from this response must be logged as a new request using the online form:

<https://www.gov.uk/government/publications/environmental-permit-pre-application-advice-form>

If you need more extensive or technical pre-application advice, you can ask for our Enhanced service. The enhanced pre-application advice is charged at £100 per hour plus VAT. You will need to complete and submit a new online pre-application request to request enhanced pre-application advice.

Applying for a permit

If you submit an application to vary your environmental permit application then please quote this pre-application reference number **EA/EPR/EP3595SK/V007**.

Completed applications should be sent via email to:

psc@environment-agency.gov.uk

Or by post to:

Environment Agency, Permitting Support Centre, Quadrant 2, 99 Parkway Avenue, Sheffield, S9 4WF.

A permit application must contain the following information:

Declaration

Please ensure the Declaration section is completed by each “relevant person”.

For an application from an individual, a relevant person is the person to be named on the permit.

For an application from more than one individual, each person who is applying for their name to be on the permit must complete the declaration – you will have to print a separate copy of the declaration page for each additional individual to complete.

In the case of a company, a relevant person must be an active director/company secretary as listed on Companies House – <https://beta.companieshouse.gov.uk/>

For a charity, a relevant person is a key postholder, ie, chair, chief executive, director or trustee.

Please ensure the declaration tick box is completed. The Declaration section is found on Form F1 section 5 (or if you are completing Forms B6.5 or B6.6, it is in section 9).

Site Plan

The site plan must be clearly marked with the full site boundary.

Application fee

Please note that your application will not be processed until we receive the full application fee payment.

If you have any questions please find my contact details below.

Yours sincerely

Bethany Smith

Permitting Officer
bethany.smith@environment-agency.gov.uk