

Cook and Son Ltd., Rowley Farm Materials Recycling Yard

Non-Technical Summary

1. Introduction

This application is for a Variation of Permit No. EPR/EB3135RZ for the existing materials recycling yard at Rowley Farm, Lowfield Heath, Crawley, West Sussex RH10 9SL.

The yard has been operating for several years under a Standard Rules Permit SR2010No.12. A copy of the current Permit (Ref: EPR/EB3135RZ) is provided in Appendix A of the Environmental Management System (EMS) (Ref: RF/004), which accompanies this application. This variation application is for the conversion of the Standard Rules Permit to a Bespoke Permit, based almost entirely on Standard Rules SR2010No.12 with the amendment of EWC 19 12 12 and the addition of EWC 17 09 04.

2. The site

The yard is located on Rowley Farm and is situated to the west of James Watt Way. Access is via a vehicle entrance on James Watt Way. The site is surrounded by farmland to the north with Gatwick Airport beyond. Rowley Farm itself is located to the west of the yard and there is further farmland to the south, with Manor Royal Business Park (Crawley) beyond.

The Site Plan is contained in Schedule 1 of the current Permit (provided in Appendix A of the EMS) and shows the location of the site.

3. Permitted Activities

The yard carries out the “Treatment of waste to produce soil, soil substitutes and aggregate” under Standard Rules SR2010No.12. The additional waste types will not change the permitted activity and will consist of soils, brick, concrete, tiles and ceramics, all of which are already permitted (under different EWC’s) within the current Permit. The amendment/addition of the waste codes will not broaden the type of waste materials received at the site. The amended/additional waste codes will enhance the site’s ability to receive suitable feedstock materials and improve its capability to produce recycled aggregates.

Amend 19 12 12

The current Standard Rules Permit already includes 19 12 12, but the description restricts it to “treated bottom ash”. Below is an extract from the current Permit:

19 12 12	treated bottom ash including IBA and slag other than that containing dangerous substances only
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This is considerably more restrictive than the description of the same waste code (19 12 12) in SR2015No.39, which states:

19 12 12	Other wastes (including mixtures of materials) from mechanical treatment of wastes other than those mentioned in 19 12 11	Restricted to crushed bricks, tiles, concrete and ceramics only. Metal from reinforced concrete must be removed. Does not include fines from treatment of any non-hazardous waste or gypsum from recovered plasterboard.
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This variation seeks to amend the Rowley Farm Permit, so that the description of 19 12 12 matches the description stated in SR2015No.39, allowing bricks, tiles, concrete and ceramics to be accepted. It should be noted that these are already permitted (individually) under the current Permit and are key constituents to the production of recycled aggregates.

Addition of 17 09 04

It is proposed to add 17 09 04 Demolition Waste to the Permit. However, this will be restricted to the description below:

17 09 04	restricted to consist of mixtures of 17 05 04, 17 01 01, 17 01 02, 17 01 03, 17 01 07 only.
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This matches the description stated in the “WRAP Quality Protocol” and means that the demolition waste will be restricted to a mixture of usable construction wastes such as soils, stones, bricks, ceramics and concrete. Once again, these are already permitted (individually) under the current Permit and are key constituents to the production of recycled aggregates.

4. Waste Acceptance

As stated previously, the amended/additional waste codes will comprise waste types that are already permitted (individually) under the current Permit, the acceptance procedures will therefore remain largely unaltered.

Only waste types listed in the Permit will be accepted on to the site. The list of waste codes provided in this application (Table 1b, Form B4) is based on the list of wastes in Standard Rules SR2010No.12 with the amendment of 19 12 12 and the addition of 17 09 04.

Waste materials will only be accepted from Registered Waste Carriers. All waste materials received at the site will be accompanied by a Controlled Waste Transfer Note and materials will be visually checked upon arrival. Non-compliant materials will be rejected and removed from the site. Records will be kept of all materials arriving and leaving the yard. Full details of the waste acceptance procedure is described in the *Environmental Management System (Ref. RF/004)*., which also contains the WRAP compliant Protocol “*Rowley Farm Recycled Materials: Quality Protocol (Ref. RF/005)*”. A copy is provided with this variation application.

Additional Procedures for 17 09 04

There is potential for the proposed additional mixed waste code 17 09 04 to include other undesirable construction wastes; i.e. plastic, timber, metal, plasterboard, asbestos, etc.

Additional acceptance procedures will be carried out, as described below.

- a) Source sites will be reviewed to determine how the mixed waste was produced and whether there is potential for it to contain undesirable construction wastes (i.e. plastic, timber, metal, plasterboard, asbestos, etc.).
- b) Where there is potential for waste classified as 17 09 04 to contain undesirable construction wastes, the source site (i.e. waste producer) will be requested to provide chemical test results.
- c) Materials delivered as 17 09 04 may be quarantined, awaiting inspection and/or information from the waste producer. Rejected loads will be recorded.
- d) Verification sampling will be carried out on the aggregates produced from 17 09 04 materials. Laboratory testing of these samples will include chemical analysis, plus testing for the presence of asbestos. Where asbestos is detected, further testing may be carried out to quantify the asbestos. Materials with detachable levels of asbestos will be removed from site.
- e) Skips will be available for any deleterious material that may require removing (picking) from the materials. These skips will be removed by a registered waste carrier and records will be kept.

The above 'additional procedures' will be added to the *Environmental Management System (Ref. RF/004)*, once the variation has been made to the Permit.

5. Risk Management

The additional waste codes will not broaden the types of waste allowed under the Permit. The additional waste codes will consist mixtures of wastes such as soils, stones, bricks, ceramics and concrete, these are already permitted (individually) under the current Permit. The risks to the environment remain unaltered and the current Risk Assessment remains applicable and adequate. A copy of the Risk Assessment (*Ref. RF/013*) accompanies this variation application.

Mitigation measures to control and manage fugitive emissions are also identified in the *Environmental Management System (Ref. RF/004)*, also accompanying this application.

6. Technical Guidance Notes

The importation and utilisation of the waste materials will be carried out in accordance with the relevant Technical Guidance Note (TGN). The following have been identified as relevant:

- a) *Controlling and Monitoring your emissions for an Environmental Permit (EA Online Guidance)*
- b) *Developing a Management System (EA Online Guidance)*
- c) *EA WRAP Quality Protocol: Aggregates from Inert Waste*

7. Supporting Documents

The following supporting documents are submitted with this Variation Application:

Document Ref.	Title
RF/004	Environmental Management System (Ver. C)
RF/005	Recycled Materials: Quality Protocol (contained within Appendix of EMS)
RF/013	Risk Assessment (Ver. A)
RF/020	Non-technical Summary
RF/021	Table 1a & Table 1b
5159729	WAMITAB Certificate – William Smith