

Our ref: JER8362

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Date: 09 July 2020

Environment Agency Permitting Support Centre
Environmental Permitting Team
Quadrant 2
99 Parkway Avenue
Parkway Business Park
Sheffield
S9 4WF

Dear Sir/Madam,

EPR/FB3903MA - APPLICATION TO VARY AN EXISTING WASTE PERMIT TO AN INSTALLATION PERMIT FOR A SITE AT BOULDER BRIDGE ROAD, BARNSELY.

An application to vary the above waste permit to an installations permit was submitted to the Environment Agency in January 2020. At the time of the application the list of waste codes to be included within the installation permit mirrored that in the existing waste permit without change. The waste codes included EWC code 16 02 16 (components removed from discarded equipment other than those mentioned in 16 02 15), 17 04 11 (cables other than those mentioned in 17 04 10) and 19 12 12 (other wastes (including mixtures of materials) from mechanical treatment of wastes other than those mentioned in 19 12 11). Due to the recent Environment Agency reclassification of some WEEE components, some WEEE waste is now being deemed potentially hazardous under EWC codes 16 02 15* (hazardous components from discarded equipment), 17 04 10* (cables containing oil, coal tar and other hazardous substances), 19 12 11* (other wastes (including mixtures of materials) from mechanical treatment of waste containing hazardous substances) and 19 02 04* (premixed wastes composed of at least one hazardous waste). Consequently there is a requirement for operators to transition to compliance and a need to include 16 02 15*, 17 04 10*, 19 12 11* and 19 02 04* into the permit variation to IED, in addition to the codes 16 02 16, 17 04 11 and 19 12 12 already included in the permit variation. To continue to accept and treat these wastes we request that EWC codes 16 02 15*, 17 04 10*, 19 02 04* and 19 12 11* are added to the list of wastes which the site is permitted to accept. The total quantity of waste falling under 16 02 15* and 16 02 16 will remain similar to the total quantity of waste currently accepted under 16 02 16; the total quantity of waste falling under 17 04 10* and 17 04 11 will remain similar to the total quantity of waste currently accepted under 17 04 11; and the total quantity of wastes falling under 19 12 12 and 19 12 11* will be similar to those currently accepted under 19 12 12. While the inclusion of the waste code 19 02 04* introduces a new type of waste to the site, there will be no increase in the amounts of waste to be accepted at the site.

The treatment capacity for hazardous waste exceeds 10 tonnes per day and therefore the following activity will need to be included in the permit:

Section 5.3, Part A(1) (a) disposal or recovery of hazardous waste with a capacity exceeding 10 tonnes per day involving one or more of the following activities:

(ii) physico-chemical treatment

The site will store up to 400 tonnes of persistent organic pollutants (POPs) hazardous waste (i.e. all WEEE-derived cable, some non WEEE-derived cable and wastes with potential contact with plastics from WEEE

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cable) and up to 1000 tonnes of other hazardous waste (i.e. all other non WEEE-derived cable). Temporary storage of hazardous waste with a total capacity exceeding 50 tonnes can trigger a Section 5.6 activity where it is subsequently landfilled, incinerated/co-incinerated or disposed or recovered by any of the following activities:

- i. biological treatment;
- ii. physico-chemical treatment;
- iii. blending or mixing prior to submission to any of the other activities listed in this section of section 5.1;
- iv. repackaging prior to submissions to any of the other activities in this section or in section 5.1;
- v. solvent reclamation or regeneration;
- vi. recycling or reclamation of inorganic materials other than metals or metal compounds;
- vii. regeneration of acids or basis;
- viii. recovery of components used for pollution abatement;
- ix. recovery of components from catalysts;
- x. oil refining or other re-uses of oil;
- xi. surface impoundment.

The proposed treatment of the hazardous waste is classified as a physico-chemical treatment process and therefore a Section 5.6 Part A(1) (a) activity also needs to be included in the permit.

Reference to hazardous waste in the remainder of this document refers to waste falling under EWC codes 16 02 15*, 17 04 10*, 19 02 04* and 19 12 11*.

1 Waste acceptance and storage of hazardous waste

The wastes falling under EWC code 16 02 15*, 17 04 10*, 19 02 04* and 19 12 11* will be the same wastes that have previously been accepted under EWC code 16 02 16, 17 04 11, 19 02 04* and 19 12 11*. Waste pre-acceptance procedures are already in place for the permitted EWC codes and the same procedures will be applied to wastes falling under the hazardous waste codes.

Waste will be delivered to the site in bulker trucks. All waste accepted must be accompanied by a hazardous waste consignment note with all relevant fields completed. Documentation will be checked on arrival at the site and prior to accepting the waste. Waste acceptance procedures (including waste rejection) currently applied to the permitted wastes will be applied to the hazardous waste.

Procedures already identify the requirement for hazardous wastes to be accompanied by a relevant hazardous waste consignment note and that this is checked prior to waste being accepted on the site. The waste acceptance procedure formed one of the documents submitted with the application to vary the permit.

A dedicated storage bay for material falling under each of these waste codes will be provided and all waste assigned with these hazardous waste codes, once accepted on to the site, will be stored in these areas prior to processing. The storage areas for the hazardous wastes are shown on the updated site layout plan included as enclosure A. A maximum of 400 tonnes of POPs hazardous material and 1000 tonnes of other hazardous material can be stored, albeit routinely storage volumes are expected to be well below this maximum.

The hazardous waste storage bays will be on impermeable pavement.

2 Waste treatment of hazardous waste

Treatment of hazardous waste will remain the same as that currently carried out on waste previously falling under EWC codes 16 02 16, 17 04 11 and 19 12 12. The treatment process is batch fed allowing batches of hazardous waste to be processed separately to batches of non-hazardous waste.

Each batch will be treated within the super chopper and multipurpose rasper to reduce the size of the delivered waste. The cut/size reduced material will be subject to metals removal using a series of magnetic separation stages and manual picking to remove unsuitable materials. Air separation is used to remove the light fraction. The remaining waste passes via the granulation stage which comprises two fine granulators.

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Downstream separation divides the output from the granulation stage into a metal fraction and a plastic fraction. The separated fractions are separately bagged. The treatment processes for this waste are described in detail within Appendix 4 to the submitted operating techniques document and associated process flow diagram provided as Appendix 5.

The metallic waste is removed off-site for recycling.

Article 7 of the Regulation (EU) 2019/1021 of the European Parliament and of the Council on persistent organic pollutants (the POPs regulation) requires that any POPs in waste plastic is destroyed or irreversibly transformed. Destruction of POPs in the waste plastic fraction is achieved by off-site third party facilities that accept this residue and destruction of POPs will be achieved by incineration or pyrolysis.

3 Environmental Risks

The proposal to include EWC codes 16 02 15*, 17 04 10*, 19 02 04* and 19 12 11* will not introduce new point source emissions to air, water or land. There will be no change to the potential for odour or noise emissions from the site as the odour potential for the hazardous waste is considered similar to that for existing wastes accepted at the site and no new or changes to existing noise sources will be introduced by processing this material. A dust risk assessment was included with the variation application, this has been reviewed and the conclusions of the assessment remain appropriate for proposals including the additional waste codes.

The storage and processing of the additional waste codes does not increase the fire risk at the site and the current fire prevention measures as set out in the Fire Prevention Plan submitted with the variation application are considered appropriate. There are no new or increased accident risks associated with storing and treating the hazardous waste.

The proposed hazardous waste codes introduce new hazardous material that will be stored and processed at the site. Hazards associated with these waste codes relate to contamination of plastic components with persistent organic pollutants (POPs). The potential for contamination of ground and groundwater is minimised by the following:

- The material will be stored only in the designated storage area which is underlain with impermeable pavement.
- A sealed drainage system is in place on the site.
- Processed material is bagged prior to storage and removed off-site.
- The incoming hazardous waste and separated fractions are solid, any spillage would be cleared up immediately using dry techniques

Although a hazardous waste, due to the pollutant potential being part of a solid material the potential for contamination of ground or groundwater is extremely limited. Assuming this request for including the new EWC codes in the list of permitted wastes that can be accepted at the site is consented, the SCR and IED baseline report will be updated to acknowledge that the hazardous wastes are stored and treated at the site, but to also confirm that they are not considered relevant hazardous substances and on that basis no additional baseline data would need collecting.

As a waste management facility information was submitted with the variation application to demonstrate technical competence to operate the facility. The Continuing Competence Certificate for Anthony Hiles was provided and demonstrates his competencies for the existing activities but also for transfer and treatment of hazardous waste. His current certification covers the following schemes:

TSH – Transfer - Hazardous Waste

TMH – Treatment – Hazardous Waste

WEEE – Waste Electrical and Electronic Equipment

4 BAT Assessment

The application for a variation included an assessment of BAT against the BAT conclusions for waste treatment activities. There are few BAT Conclusions where there are requirements that are specific to hazardous wastes and consequently the BAT Assessment will remain appropriate. The one area where hazardous waste is addressed is within BAT 4. An updated response to BAT 4 is provided below, changes are included as red text:

BAT 4	<p>In order to reduce the environmental risk associated with the storage of waste, BAT is to use all of the techniques given below.</p> <ul style="list-style-type: none"> a) Optimised storage location b) Adequate storage capacity c) Safe storage operation d) Separate area for storage and handling of packaged hazardous waste
Sims justification/evidence	<p>All wastes are stored in line with the requirements of the relevant Regulations and Directives and as per the site's Environment Management Systems.</p> <p>All wastes received and all outputs from the site processes will be stored in designated areas as per Drawing JER8362-PER-001_D_200109_SiteLayoutPlan, as well as per the arrangements set out in the Operating Techniques document, and Environment, Fugitive Emissions & Accidents Risk Assessment and Management Plan.</p> <p>To ensure that waste storage arrangements are being adhered to, monthly checks of the stockpiles are conducted. If issues are identified, then records are made and suitable actions are determined in accordance with the Non-Conforming Waste Procedure outlined in the Operating Techniques.</p> <p>The documents below cover BAT 4 techniques a (optimised storage location), b (adequate storage capacity) and c (safe storage operation). BAT 4 d (separate area for storage and handling of packaged hazardous waste), although incoming hazardous waste will not be packaged dedicated separate areas for storing this material is provided. Hazardous processed plastic will be bagged and stored prior to removal off site. Any other hazardous waste that is identified at site will be handled as non-conforming waste as described in the Operating Techniques document and the Environment, Fugitive Emissions & Accidents Risk Assessment and Management Plan.</p> <p>Relevant IMS documents:</p> <ul style="list-style-type: none"> • Operating Techniques • Drawing JER8362-PER-001_D_200109_SiteLayoutPlan <p>Environment, Fugitive Emissions & Accidents Risk Assessment and Management Plan</p>
Compliant / Not Compliant	Compliant with all relevant parts of BAT 4.
Action	No action required.

5 Conclusions

The above provides information on the proposal to include EWC codes 16 02 15* 17 04 10*, 19 02 04* and 19 12 11* as permitted wastes that can be accepted and treated at the site. Overall it is concluded that accepting these wastes will not significantly increase the environmental risks from the installation. The existing management measures are sufficient to control risks to the environment. The only additional measure is the inclusion of dedicated storage bays for separate storage of hazardous waste.

Given the additional waste codes introduce two further listed activities we have updated application form C2 and F1. A payment of £13,827 was made at the time of submitting the variation application. We calculate the total fee due now to be £24,886.90 and therefore a payment of £11,059.90 has been made to cover the difference. This payment was made 08/06/2020, see attached confirmation of payment (enclosure B).

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On a separate note when the variation application was submitted Clare Haste was identified as the point of contact regarding the application. We wanted to request that any correspondence relating to the application be sent to Victoria Jones in addition to Clare Haste.

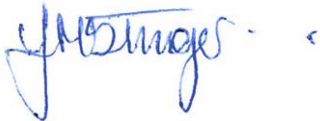
Victoria's details are as follows:

Victoria Jones
SHECS Director - UK Metals
Sims Group UK Limited
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CV37 8AQ

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We trust that the above provides sufficient information to support the inclusion of EWC codes 16 02 15*, 17 04 10*, 19 02 04* and 19 12 11*. Should you have any further questions please let me know.

Yours sincerely,
for RPS Consulting Services Ltd



Jennifer Stringer
Technical Director
stringerj@rpsgroup.com

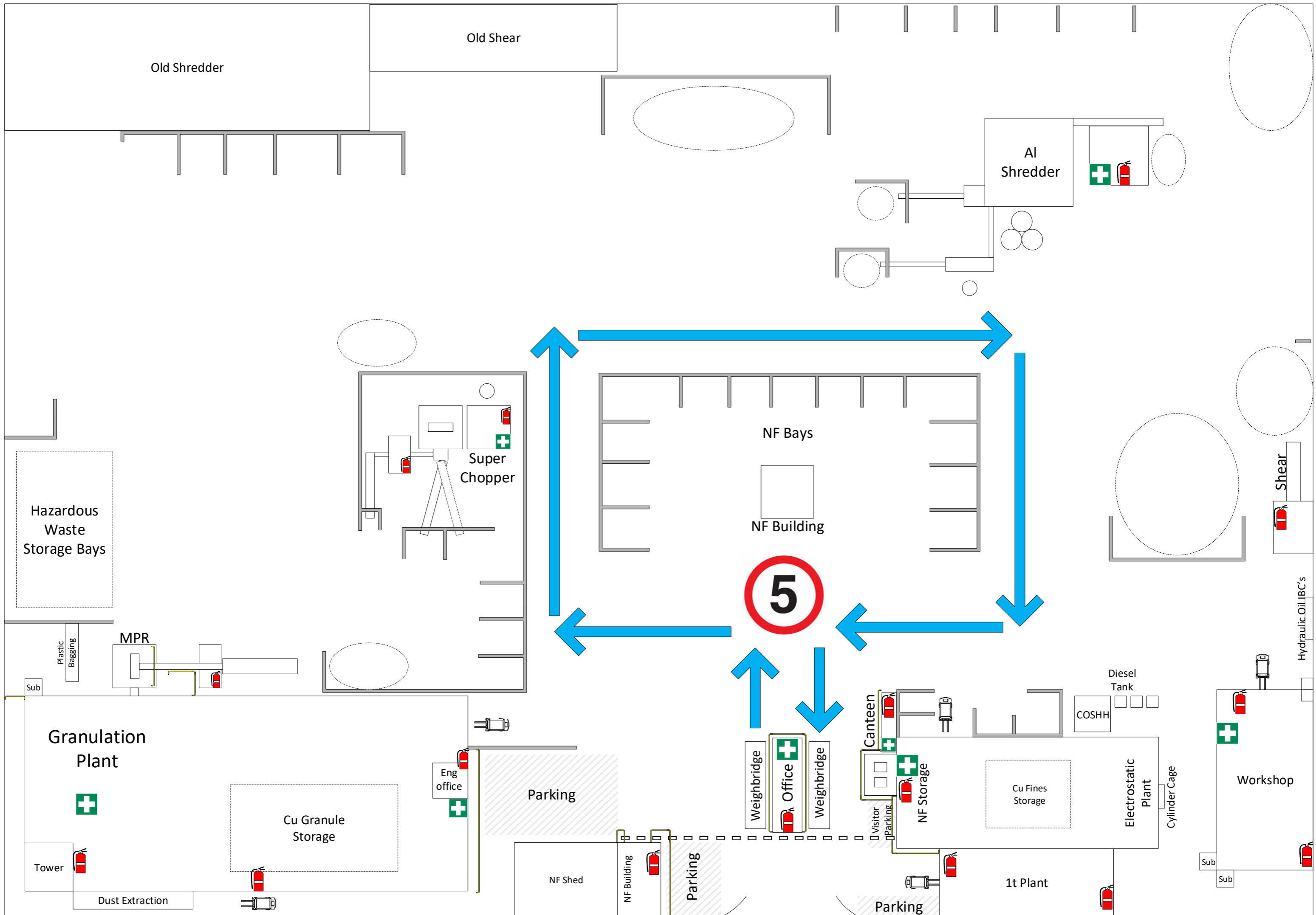
ENCLOSURES

Enclosure A Updated Site Plan Identifying the Storage Area for Hazardous Waste
Enclosure B Confirmation of Additional Payment

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Enclosure A

Updated Site Plan Identifying the Storage Area for Hazardous Waste



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Enclosure B

Confirmation of Additional Payment

View: Batch Detail**Batch ID 74871909**

Value Date: 08/JUN/20	CCY: GBP	Transactions: 1
Destination: GB	Instrument Type: Direct Credit	Amount: 11,059.90
Country:	FastPay	Status: Processed
Originating Acct: 41397469	Received for: 08/Jun/20 04:31 AM	Last Modified By: luhayward
	Processing: EST	
	Last Modified Date: 08/JUN/20	

Items 1-1

Transaction ID	Originating Reference #	Dest. Bank Code	Dest. Acct #	Dest. Acct Name	Amount
107175926	Barnsley EA	607080	10014411	EA Receipts	11,059.90
Batch Totals:					11,059.90

View: Transaction Detail**Transaction 107175926 Details**

Originating United **Account:** 41397469 GBP
Country: Kingdom
Destination United **Instrument** Direct
Country: Kingdom **Type:** Credit -
FastPay

Amount 11,059.90 GBP
Value Date 08/JUN/20
Your Barnsley EA
Reference

Beneficiary Details (Details of the party the payment is for)

Destination 10014411
A/C
Bank ID 607080
Name EA Receipts

Payment PSCAPPSIMSG086
Details
Internal
Control ID
RTI #