

Permit Variation Proposal

**BKP WASTE & RECYCLING LTD
CASBROOK PARK, BUNNY LANE, TIMSBURY**

SO51 0PG

Permit number: EPR/FP3599LH

FEBRUARY 2021

Version 2

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Non-Technical Summary

The Variation is being submitted in order to simplify on-site activities and expand the range of EWC codes for treatment, transfer and repacking. There are additions of some of the EWC codes on treatment activities to include materials of a similar chemical composition that are suitable for the processes onsite that are not included on the current permit.

We wish to add some new activities to develop the operations onsite;

We wish to wash off low-hazard empty hazardous containers to enable the recovery and recycling of material after chemical contaminants are removed.

We wish to mechanically or hand-sort mixed portable batteries by chemistry to enable them to be sent directly into recyclers and issue evidence notes on these batteries. We wish to be able to receive and sort industrial and automotive batteries and send to recycling facilities.

We wish to add recycling and recovery of road sweeping or similar inorganic wastes to recover fractions as washed aggregate products.

Adding in DAA5 Tanker washing as a directly associated activity to AR1 allowing the cleaning of our transport tankers following oil/water storage. Also addition to allow Disposal codes to allow for non-recoverable materials which currently aren't covered. We are removing some treatment activities we do not currently use and any work will be sent directly to third party suppliers such as treating sewage.

Some storage capacities for activities are to be increased but none will require increased packaged waste storage areas to be built. Existing capacities under the permit are deemed to be insufficient. This is to allow growth and cover storage for additional activities on the site.

There will be no additional points of emission to air or water.

Proposed Changes – As per spreadsheet – “Permit variation activities V010”

AR1 – Expansion of EWC Codes acceptable for treatment within this activity

We would like to add additional EWC codes suitable for treatment via this activity. This is to include other oily waste streams suitable for oAVC treatment. Material will be treated onsite to separate into separate components and the treated effluent will be transferred offsite to a waste water treatment works. The recovered oil will be tested and sent for recovery or to be used as a fuel.

A separate document detailing is attached to this application with EWC code additions by activity – BKP004 TAB -“permit variation EWC V010”

AR2 – Expansion of EWC Codes acceptable for treatment within this activity

Expansion of EWC lists to include other waste streams that may be suitable for dewatering. Only low hazard materials where centrifugation improved physical properties to enable more efficient disposal. Same activity techniques for existing activity A6 and A7.

AR3 – Addition of new activity, washing nominally empty packaging to remove hazards to enable recovery of packaging material or reuse of container

Washing of nominally empty hazardous steel or HDPE, PP packaging prior to recovery or reuse of containers. Containers are technically assessed and compatibility assessments done prior to processing to check suitability for washing and inspected prior to washing and recovery of plastic as a granulate. Effluent is reused and recycled where possible prior to disposal offsite. No flammable/high hazard containers to be processed onsite.

We would like to include wash empty waste containers contaminated with low hazard materials under HP codes HP4, HP5, HP6, HP7, HP8, HP13, HP14. No further storage is required. The activity will take place at the North of the site where the packaged waste transfer station resides. It will be completed within a bunded area and all liquids will be contained. Materials will be assessed for suitability for process prior to treatment and no incompatible nominally empty containers will be mixed. Empty containers will be visually inspected to confirm they are nominally empty under the supervision of a site chemist. Materials will be washed & shredded/granulated to make a clean granulate to be shipped to end recycler for reprocessing. Waste effluent will be sent to third party

treatment facility for disposal. No POPs, HP3, HP2 or other high hazard residues will be washed onsite.

Washing and shredding activities will only be completed in a bunded area within the transfer station. Contaminated water will be stored in storage tanks contained within secondary containment.

Where possible containers will be washed for reuse to and comply with BAT.

AR4 – New activity – Hand sorting of batteries to enable their recovery

We would like to hand sort mixed portable batteries by chemistry to enable their recovery. We will be applying for an ABTO/ABE and already receive mixed portable batteries from our customers that we transfer to another ABTO/ABE for treatment. The process will consist of transferring material onto a table to allow sorting by hand into their individual chemistries prior to shipping to end recyclers. The site will handle automotive and industrial batteries as separately collected fractions and these will be sent to end disposal for recovery. Treatment sites used will comply with BAT and meet the minimum recycling efficiencies for the ABE approval. Batteries will only be sorted in a bunded area within the transfer station by trained staff and sorted batteries will be packed in accordance with ADR / IMDG / HSG71 and electrically insulated to prevent short-circuit. Sorted Primary & Secondary Lithium batteries will be packed in steel or plastic containers (steel with >0.1mm thickness non-conductive liner) & packed within inert packing material (either vermiculite or kiln dried sand <10% moisture content). All other battery chemistries will be stored in a bunded area in sealed containers. Any wet celled industrial batteries will be stored in sealed plastic containers in a bunded area. Lithium Metal and Lithium Ion batteries will be stored in a separate metal container adjacent to the WEEE storage area.

AR5 – Expansion of EWC Codes for repacking

We wish to expand the range of EWC codes for repacking in-line with codes we can accept for storage and transfer. Any dusty or fibrous wastes are omitted from this activity.

AR6 – Expansion of hazardous EWC Codes for storage pending recovery or disposal

We wish to expand the range of EWC codes for storage pending recovery or disposal. We also wish to increase the total amount of material stored onsite associated with this activity from 300 Tonnes to 750 tonnes at any given time. This is to allow for expansion of activities onsite and will be achievable within current storage area.

AR7 – Expansion of Non Hazardous EWC codes for dewatering and expansion of activity

We wish to expand the list of EWC codes for dewatering via onsite processes. We will operate the same processes for this activity.

AR8 – Combination of 2 Activities, EWC code addition and expansion of techniques

We wish to expand the list of EWC codes for this activity. We to install a material separation and washing plant to enable us to recover recyclable inorganic materials from these wastes. We wish to extend the description of the activities to enable more efficient handling of solid / sludge fractions and potentially allow for greater material recovery from non-hazardous wastes. This will include particle size separation, density separation and washing of solids from this activity.

DAA1 – Addition of EWC Codes

We wish to expand the list of Non Hazardous EWC codes accepted at the facility.

DAA2 – Addition of EWC Codes

We wish to expand the list of Non Hazardous EWC codes acceptable at the site for this operation in line with DAA1.

DAA3 – Addition of 1 EWC Code

We wish to add 1 EWC code to this permitted activity.

DAA4 – New directly associated activity washing non-hazardous packaging

We wish to add a directly associated activity of washing and shredding/granulating non hazardous packaging to enable it's recovery. It will be limited to waste materials in table 2.11

DAA5 – New directly associated activity removing excess solids and washing tankers

We wish to add a directly associated activity of solid removal and washing of road tankers. This will be completed in the main yard on a sealed impermeable surface within the bunded area. Liquids are residues will be collected and treated through the liquid treatment plant as appropriate. The solids will be treated through the dewatering equipment or sent to a third party facility to be processed.

Environmental Impacts of Proposed Changes

Each Activity is detailed in the attached Environmental Risk Assessment but we do not envisage any increased risk of environmental hazard via emission or discharge.

The increased storage capacity reflects only the current site infrastructure and is not being extended past current capabilities therefore we believe there is no increased risk of fire, nor will there be an increase in current volumes of combustible waste streams on site. All activities are proposed to reduce our environmental footprint by treating and recovering more waste directly on site and reducing transfer.

Emissions

Emissions to Air

There are no new process emission points to air from the proposed changes at site.

Emissions to Water / Sewer

There will be no direct emissions to controlled waters or sewers from the proposed changes at site.

Emissions to Land

No direct emissions to land will occur as a result of this variation.

Other Aspects

Raw Material Usage

There are no changes to waste materials stored at the site. The water usage for the facility will increase for washing hazardous containers. This is estimated to be approximately 5,000L/week of water but will depend on throughput. Where possible surface water will be reused for this activity and water from site roofs will be collected. The new activity AR8 will be water neutral as the water for washing the product is recycled from the wet waste delivered in

Waste

There are no changes to the proposed waste streams generated at the site. The waste from the treatment processes will be better separated to allow greater recovery.

Energy Efficiency

There is an increase in energy usage expected at the facility for the new processes.

The road sweeper / aggregate recycling operation is expected to use a maximum of 1000Kw / Week based on 40 hours of operation in normal conditions.

The plastic recycling plant is expected to consume 3000KW / Week based on normal operating conditions. This is dependent on operating hours and the size of granulator for the process and size of granulator used.

This energy usage will be closely monitored and processes will be run as batches where appropriate to keep energy usage down.

There is the desire longer term to add solar panels to the facility to reduce the energy requirement locally and carbon footprint of the facility.

Accident Management Plan

An Accident Management Plan is already in place for the installation, in accordance with the requirements of the Environmental Permit. This plan will not be affected by the proposed changes

Odour

There is no change to odour at the site

Visual Impact

There will be no visible changes to the site visible from the site boundary.

Noise and Vibration

There will be no change to noise and/or vibration to the site. A noise survey for the road sweeper plant is attached to this effect BKP – Noise survey aggregate plant

Monitoring

Infrastructure Monitoring

The site applies a structured regime of infrastructure checks, which are incorporated into the site's management system. This will all be monitored by the departmental managers and general managers and recorded on daily checks.