



***Variation Application***  
***Environmental Permit EPR/WE1063AB***

**Phoenix Yard, Swinborne Road, Burnt Mills Industrial Estate, SS13 1EF**

**March 2023**

[WAW-PY-VAR-V1]

**DOCUMENT CONTROL SHEET**

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## **1. INTRODUCTION**

- 1.1 This report supports an application to vary an Environmental Permit on behalf of Waste-A-Way Recycling Limited (WAW), at Phoenix Yard, Swinborne Road, Burnt Mills Industrial Estate, SS13 1EF.
- 1.2 The company has an Environmental Management System (EMS) that will be updated pending the outcome of this variation. This document includes a summary of the EMS.
- 1.3 The Environmental Permit was originally issued on 19 February 2021. The permit is a Standard Rules permit SR 2015 No.6 Household, Commercial and Industrial Waste Transfer Station with Treatment.
- 1.4 The site receives waste from Local Waste Collection Authorities, both “black bag” waste and kerbside recycling, as well as similar commercial waste. The waste is bulked loaded for transfer off-site.
- 1.5 It is proposed to increase the annual throughput to 120,000 tonnes.
- 1.6 This will result in a bespoke permit and as a result this application will specifically include the waste codes and activities that will be carried out at the site.
- 1.7 It is proposed to include the following waste codes:

15 01 01	Paper and cardboard packaging
15 01 02	Plastic packaging
15 01 03	Wooden packaging
15 01 04	Metallic packaging
15 01 05	Composite packaging
15 01 06	Mixed packaging
15 01 07	Glass packaging
15 01 09	Textile packaging
20 01 01	Paper and cardboard
20 01 02	Glass
20 01 10	Clothes
20 01 11	Textiles
20 01 34	Batteries
20 01 38	Wood
20 01 39	Plastics
20 01 40	Metals

20 02 01	Biodegradable waste (from parks and gardens)
20 03 01	Mixed Municipal Waste
20 03 02	Waste from Markets
20 03 07	Bulky Waste

- 1.8 The site will not accept food waste.
- 1.9 It is proposed to include the following activities, which are as set out in the existing environmental permit.

Description of Activities	Limits of Activities
<p><b>D15:</b> Storage pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where it is produced)</p> <p><b>R13:</b> Storage of wastes pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced)</p> <p><b>D14:</b> Repackaging prior to submission to any of the operations numbered D1 to 13</p> <p><b>D9:</b> Physico-chemical treatment not specified elsewhere in Annex IIA which results in final compounds or mixtures which are discarded by means of any of the operations numbered D1 to D8 and D10 to D12</p> <p><b>R3:</b> Recycling/reclamation of organic substances which are not used as solvents</p> <p><b>R4:</b> Recycling/reclamation of metals and metal compounds</p> <p><b>R5:</b> Recycling/reclamation of other inorganic materials</p>	<p>Treatment consisting only of manual sorting, separation, screening, baling, shredding, or compaction of waste into different components for disposal, (no more than 50 tonnes per day) or recovery.</p> <p>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.</p>

## **2. SUMMARY ENVIRONMENTAL MANAGEMENT SYSTEM AND OPERATIONS**

### **Management System**

- 2.1 The company has developed its own Management System. This will be updated once the permit has been varied.
- 2.2 The EMS is summarised in this section. The EMS provides the operational procedures for the site including waste acceptance and storage. It follows the headings set out in Environment Agency Guidance – Develop A Management System: Environmental Permits.
- 2.3 The guidance document, Non-Hazardous and Inert Waste: Appropriate Measures for Permitted Facilities, July 2021 has been reviewed to confirm compliance with the appropriate measures. Each section has been reviewed to check compliance and noted accordingly below.
- 2.4 The EMS incorporates the appropriate measures set out in Section 2.1 of the guidance.

### **Site Infrastructure Plan**

- 2.5 Drawing No WAW/PY/INF/01 provides the site Infrastructure Plan. This shows the site surfacing, locations of buildings, location of fuel tank and site entrances. Within the Environmental Risk Assessment, all key receptors have been identified on a separate plan.
- 2.6 For this variation, the Site Infrastructure Plan does not change.

### **Site Operations**

- 2.7 WAW has operated a waste transfer station from the site since June 2021. It also uses part of the site as its HGV operating centre.
- 2.8 There is an existing building on site which has been divided into two operational areas. The southern half is used for vehicle maintenance and provides the workshop. This has its own roller shutter doors and operates separate to the Waste Transfer Station (WTS).
- 2.9 The WTS is inside the northern part of the building. It has been set out with internal storage bays to receive waste. There is a loading bay at the northern end of the building, which is used to load articulated vehicles fully inside the building.
- 2.10 There is a roller shutter door for the waste reception operation, and a separate roller shutter door for the loading bay.
- 2.11 WAW is currently contracted with Basildon Borough Council and Castle Point Borough Council to provide waste reception, bulking and transfer for their kerbside collected waste and recycling materials.
- 2.12 There may be other Waste Collection Authorities utilising the site in the future, as well as other commercial users, generating similar wastes. This is the reason for increasing the permitted tonnage at the site.

Waste Acceptance

- 2.13 The site will continue to receive the same waste as currently accepted. WAW supports Waste Collection Authorities by providing a local facility for their waste collection services. This could include a black bag waste collection round, the recycling waste round, and a green waste collection round.
- 2.14 All waste collection vehicles will be weighed on arrival at the depot. A Waste Transfer Note will be generated, and the driver instructed to unload into the correct bay inside the building.

Waste Treatment and Storage

- 2.15 No treatment of waste will take place at the site.
- 2.16 Similar waste will be stored in the same bay. For example, one bay will be used for receiving black bag waste only. A separate bay will be used for storing recycling waste.
- 2.17 WAW operates a fleet of articulated lorries. A constant flow of bulk vehicles is planned to attend the WTS throughout each day to ensure that waste in all bays is maintained at such a level as to ensure that it is removed within 24 hours of arrival.
- 2.18 An articulated lorry will reverse into the loading bay. The waste will be loaded directly into the lorry from inside the building.
- 2.19 The waste will be loaded on a first in – first out principle, clearing the contents of one bay, whilst another bay is being filled. This rotation allows a bay to be emptied and cleaned prior to receiving more waste.
- 2.20 The EMS will set out the maximum storage limits (volume and time).
- 2.21 The Approved Fire Prevention Plan sets the storage limits and confirms that waste is cleared out daily.
- 2.22 The increase in tonnage will not increase the risks associated with the use. The operator has full control of its own haulage business and can arrange to transfer waste off-site to continually maintain capacity. Therefore, the storage volume will not change.

Quarantine, Storage and Rejection of Wastes

- 2.23 Due to the nature of the operation, it is unlikely that waste will be rejected from the site.
- 2.24 No waste sorting is carried out at the site. The site typically receives bagged waste, including the recycling waste. The bags are unloaded fully and transferred as such.
- 2.25 If any obvious non-compliant waste is encountered, it will be segregated and placed in a quarantine container. This could include electrical items for example.
- 2.26 Any details of non-compliant waste will be recorded in the site diary.
- 2.27 A duty of care transfer note or hazardous waste consignment note will be generated for each non-conforming waste load returned off site.

**Summary**

- 2.28 These details comply with Sections 4 of the appropriate measures guidance. Section 5 of the guidance relates to waste treatment which is not applicable.



### **3. EMISSIONS CONTROL**

3.1 Section 6 of the guidance relates to emissions control.

#### **Enclosure within Buildings**

3.2 Section 6.1 confirms that enclosing activities within buildings can be an appropriate measure for preventing and minimising emissions of pollution.

3.3 All waste will be received, stored and transferred inside a building, which complies with the appropriate measures for this activity.

3.4 This building is fully clad, enclosed on all sides with a roof and two roller shutter doors.

3.5 Due to the nature of waste collection, the reception doorway is kept open for efficient turnaround for Waste Collection Vehicles. Once complete, the door will be shut.

3.6 The loading bay door will be kept shut at all times, except to allow the vehicle to enter and leave the bay. There is an extension canopy over the loading bay, which means the door is set within the building. The loading bay door is not on the external wall.

3.7 The movement of waste is carried out using machines. Staff do not work permanently inside the building, other than in machines.

3.8 The building is checked daily as part of the EMS.

#### **Point Source Emissions to Air**

3.9 There are no point source emissions to air.

#### **Fugitive Emissions to Air**

3.10 A risk assessment has been prepared to assess the risk of the operations such as dust, mud, litter, odour, noise and vibration.

3.11 The site has operated since 2021 without any known complaints. This application seeks to increase the annual tonnage only. The operations will remain the same and the additional tonnage will be managed by more frequent export of waste. The risk from emissions to air will not change as a result of this application.

3.12 The site receives specific waste from municipal sources. The waste is received in bags from waste collection authorities and other commercial sources. The waste is unloaded into specific storage bays within an enclosed building.

#### **Mud and Dust**

3.13 The site does not manage wastes that could give rise to mud or dust.

#### **Litter**

3.14 Litter could be generated if bags are damaged during unloading/loading operations. However, as these activities take place inside the building, the risk of litter escaping the permit boundary is low. A full site and perimeter check for litter takes place twice daily with corrective action taken.

- 3.15 Waste is typically delivered to the site in enclosed vehicles (RCVs, Caged vehicles), and will be removed in articulated lorries which will be sheeted before leaving the building.

**Odour**

- 3.16 The guidance states *“if your activities are likely to produce odour pollution at sensitive receptors, or such pollution has been substantiated, you must implement and regularly review an odour management plan following our guidance, which includes H4 Odour management. Your odour management plan must explain how you will prevent and minimise odorous emissions from your facility.”*
- 3.17 Whilst the site handles municipal waste, there have been no odour complaints received to date. The Environment Agency regulates the site under the existing consent, and odour has never been reported. This application seeks to increase the tonnage, but as set out above, this will not increase the risk associated with odour due to the operational controls in place.
- 3.18 Waste is not allowed to accumulate on site. The site operates a rotation system which ensures a bay is fully emptied and cleaned, before being used again. When the waste is being emptied from one bay, the adjoining bay will be used to receive waste.
- 3.19 There is clear segregation of recycling and black bag waste. For both areas, the same rotation principle applies.
- 3.20 The site has a vehicle wash down facility and is subject to weekly cleaning, or as and when required.
- 3.21 There are no sensitive receptors identified in the local area.
- 3.22 An Odour Management Plan is not required.

**Noise**

- 3.23 The site is in a busy industrial estate. There are no nearby sensitive receptors.
- 3.24 No noise complaints have been received regarding the activities at the site.
- 3.25 The application seeks to retain the current permitted activities of sorting, shredding, baling and screening. These are permitted in the Standard Rules permit. As the site is only seeking to increase the tonnage, there would be no additional risk associated with retaining these activities. In the event that any such equipment is used, the operator would update the Fire Prevention Plan for approval but would not be required to formally vary the permit.
- 3.26 A Noise Management Plan is not required.

**Point Source Emissions to Water (including sewer)**

- 3.27 The operation provides sealed drainage, there will be no point source emissions to water.
- 3.28 The depot is concreted with drainage into an interceptor prior to discharge to sewer.

- 3.29 The waste operations take place in a building, which provides a cover to prevent rainwater ingress, and any contamination of rainwater or surface water.
- 3.30 Any water encountered will drain into the lowest point within the loading bay, and if necessary, the water will be pumped out and transferred off site.
- 3.31 Fuels and oils will be stored in accordance with the Storage of Oils Regulations. The site will not accept liquid waste.

**Fugitive Emissions to Land and Water**

- 3.32 The waste operations take place in a building with a concrete floor. There will be no fugitive emissions to land or water.
- 3.33 The concrete is checked daily in accordance with the EMS.
- 3.34 Surface water from the yard is collected separately and discharges into the local sewer network via an interceptor.

**Pests**

- 3.35 All waste is received, stored and transferred inside a building. The waste is removed frequently (mostly daily) to prevent any accumulations that may attract flies, rats and birds.
- 3.36 A pest control contractor is deployed on site to oversee the current conditions. This will continue in accordance with the EMS.
- 3.37 There have been no reported complaints regarding pests (flies, vermin, or birds).
- 3.38 As there are no point source emissions to air or water, Section 7 of the guidance is not applicable.
- 3.39 Section 8 of the guidance relates to installations only and is not applicable.

#### **4. WASTE MINIMISATION, RECOVERY AND DISPOSAL**

- 4.1 The waste managed on behalf of the Waste Collection Authorities is transferred under the control of Essex County Council, as the Waste Disposal Authority. WAW has no control over the final destination of this contract waste.
- 4.2 However, the operations at the site clearly segregate recycling and black bag waste, to ensure that there is no risk of cross contamination which ensures that waste separated for recycling is transferred to appropriate facilities.
- 4.3 For other commercial waste, WAW will optimise the opportunities for recycling and recovery over disposal.
- 4.4 This will comply with Section 9 of the guidance.

##### **Site and Equipment Maintenance Plan**

- 4.5 The Site Management will be responsible for inspecting the operational areas and preventative maintenance will be undertaken according to the Site Inspection Daily Checks Form.
- 4.6 Plant and machinery on site will be visually inspected by the operator before it is used as part of management of their own risks and health and safety. This is covered in training for staff and operatives. In addition, an equipment check is made by the Site Manager daily as part of Daily Checks and recorded on the Daily Checks Form.
- 4.7 In addition to scheduled preventative maintenance of equipment and machinery, in accordance with legal requirements or manufacturer's recommendations, reactive maintenance will be carried out if needed in accordance with inspection findings. This will be recorded in the site diary.
- 4.8 There is a workshop on the site with mechanics trained to carry out routine maintenance and servicing.
- 4.9 Daily checks are carried out to assess the condition of the yard including fencing, surfaces, and storage bays. If any maintenance is required, it will be done as soon as possible and recorded in the site diary.
- 4.10 Daily inspections will be carried out on the safety and integrity of the building on site, it will also be monitored throughout the working day. The daily inspections also include regular checks for litter.
- 4.11 Detailed weekly maintenance checks are carried out and recorded on a check sheet with a status and rectification/ action record to follow up on any necessary actions, records of this will be kept on site.
- 4.12 The site diary will be maintained and updated to include the following: -
- Construction/Repair work
  - Start and finish of daily waste management activities on site (operational hours)
  - Maintenance

- Breakdowns
- Emergencies
- Problems with waste delivered and action taken
- Site inspections and consequent actions carried out by the operator
- Technically competent management attendance on site; the date and the time onto site and the time left site
- Despatch records
- Weather conditions
- Complaints about site operations and actions taken
- Environmental problems and remedial actions

4.13 The site diary will be kept in the site office and updated daily.

#### **Contingency Planning**

4.14 In conjunction with the Accident Prevention and Management Plan, the EMS includes Contingency Planning. This includes measures to be implemented if the site is forced to close due to unplanned events, or in the event of breakdowns. The procedures will be used to ensure business continuity without impacting the environment.

4.15 Contingency planning complies with Section 2.4 of the guidance.

#### **Accident Prevention and Management Plan**

4.16 The Company recognises the importance of the prevention of accidents that may have environmental consequences and that it is crucial to limit those consequences. The Accident Management Plan complies with Section 2.3 of the guidance.

4.17 An accident management plan will be maintained at the facility to ensure the facility, and facility staff are fully prepared for such incidents. The accident management plan will be reviewed at least every four years or as soon as practicable after an incident with changes made accordingly to minimise the risk of recurrence.

4.18 The Accident Prevention and Management Plan sets out the contingency measures required to deal with plant breakdowns, vandalism, fires, flooding, and bad weather. These measures are provided for the situations which could change the normal operations.

4.19 For each unforeseen event, the plan sets out the following:

- Likelihood of the accident/event occurring
  - Consequence of the accident/event occurring
  - Measures taken to avoid the accident occurring
  - Measures taken to minimise the impact.

4.20 The EMS also provides a list of emergency contacts as well as contacts for the estate and adjoining businesses to contact in the event of an emergency.

### **Noticeboard**

- 4.21 There is a noticeboard at the site entrance which provides the following information:
- The permit holder's Name
  - An emergency contact name and telephone number
  - A statement that the site is permitted by the Environment Agency
  - The permit number
  - Environment Agency telephone number 03708 506506 and the incident hotline 0800 807060

### **A Changing Climate**

- 4.22 The operator is aware of the changing climate the UK is experiencing now and likely to experience in the future. With reference to the EA guidance, the UK can expect the following:
- Higher average temperatures – particularly in summer and winter
  - More heat waves and hot days
  - Rising sea levels
  - Changes in rainfall patterns and intensity
- More storms
- 4.23 The waste operations take place inside a building. This allows the operator manage operations in a manner to protect against these changing conditions.
- 4.24 The site is in Flood Zone 1, which has the least probability of flooding.

### **Complaints**

- 4.25 The EMS includes a complaint procedure which covers matters such as:
- Receiving/documenting the complaint
  - Investigation
  - Corrective Action
  - Report findings
  - Closure
- 4.26 The application seeks to increase the annual tonnage only. As set out above, this can be facilitated without increasing the risks from the activities.

### **Technical Competence and Staff Training**

- 4.27 The operations are overseen by a Technically Competent Manager (TCM). There will also be a Site Supervisor to oversee the day to day operations. The TCM will be responsible for ensuring the requirements of continued competency is met. A copy of the Certificate will be kept in the site office. The TCM and Site Supervisor will both

carry out similar functions on site, with the TCM providing the overall management to ensure compliance.

- 4.28 The Site Management will be responsible for the control of incoming and outgoing vehicles, checking Duty of Care documentation, keeping and maintaining all computerised records, checking in all visitors to the site, issuing Health & Safety instructions and reporting any complaints to the management.
- 4.29 Other site personnel will include administrative staff and site operatives.
- 4.30 All staff will be trained to a standard which enables them to perform the responsibilities and the detailed role as set out in job descriptions. The EMS provides the job description for each role including:
- Site Management
  - Plant Operatives
  - Site Operatives
  - Administration
  - Drivers
- 4.31 A record of staff training will be kept for each staff member which includes inductions to new processes and procedures as needed.
- 4.32 The following training matrix will be adopted to guide training needs.

<b>Training</b>	<b>TCM/Site Manager</b>	<b>Plant Operative</b>	<b>Site Operative</b>	<b>Admin</b>
Induction	x	x	x	x
Accidents and Emergency	x	x	x	x
Amenity Management	x	x	x	x
Plant Training	x	x		
Vehicle marshalling	x	x	x	
Waste Acceptance / Handling	x	x	x	
Environmental Permitting	x	x	x	x
Complaints and Incidents	x	x	x	x
Spillage Procedure	x	x	x	

- 4.33 The staff competence requirements comply with Section 2.2 of the guidance.

### **Records**

- 4.34 All records required to be made by this permit shall be comprehensible, legible, and consistent. If amendments need to be made, they are done so in such a way that any subsequent amendments remain legible. Records, plans and management systems required to be maintained by this permit shall also be kept on site.
- 4.35 All reports and notifications required to the permit by the Environment Agency shall be made to the Environment Agency using the contact details supplied in writing by the Environment Agency. Within one month of the end of each quarter, the operator shall submit waste returns to the environment agency using the form made available for the purpose, the information specified on the form relating to the site and the waste accepted and removed from it during the previous quarter.

### **Review Management System**

- 4.36 The EMS will be reviewed and updated if any of the following occur:
- Any compliance issues on the site which require mitigation or management intervention.
  - Changes to the site operations.
  - Changes to local environment which introduces new receptors to the area.
- 4.37 Some changes may require staff training, this will be carried out and records updated accordingly.

### **Site Closure**

- 4.38 In the event that the operations cease at the site, the operator will proceed with an application to surrender the Permit. This will require a Site Closure Plan to demonstrate that activities at the site have ceased and pose no risk to the environment.
- 4.39 The operation is quite straightforward as it uses mobile plant and equipment and would not require detailed plant decommissioning. Depending on the proposed after-use of the site will determine whether the building needs to be dismantled.