

SKIPAWAY LIMITED

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Non-technical Summary

Site B, North Farm Industrial Estate,
North Farm Lane,
Tunbridge Wells,
TN2 3EE

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Client: Skipaway Limited

Project: Non-technical Summary for the variation to the existing Waste Management Permit

**REPORT
AUTHOR**

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SIGNED	
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SIGNED	
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PERMIT NO,	EPR/LB3709LG/V003

Contents

1. Introduction	4
1.1 Site Setting	4
2. Permitted Activities	5
2.1 Present Tonnage Limit	8
2.2 Waste Types	8
3. Management System	10
4. Conclusion	11

1. Introduction

This non-technical summary has been produced in support of the application to vary the existing waste management permit to include:

- Waste code EWC 19 12 12
- Waste code EWC 20 03 01
- Increase in the quantity of waste accepted at the site to 75,000 tonnes p/a
- Addition of a wash plant

To support this application the following documentation are submitted in addition to this non-technical summary.

- Fire Prevention Plan (FPP)
- Environmental Management System (EMS)
- Relevant certificate of technical competence (COTC)
- Dust Emissions Management Plan
- Odour Management Plan
- Application forms
 - Part A
 - F1 for the current permit holder and proposed holder
 - Part C2 (varying a bespoke permit)
 - Part C4 (to make changes to a permit activity)

Ravenswood Environmental Services Limited (RES) has been retained by Skipaway Limited, hitherto referred to as the permit holder, to prepare an application to vary the existing permit for submission to the Environment Agency in respect of waste management permit reference, EPR/LB3709LG/V003 issued to the permit holder in March 2023.

1.1 Site Setting

The site is located at Site B North Farm Lane
North Farm Industrial Estate
Tunbridge Wells
Kent
TN2 3EE
OS Grid ref TQ 60390 42588
X (Easting) 560390
Y (Northing) 142588

The permitted area is 0.22 Hectares approximately. The site is not located within 500 metres of a European Site or SSSI. The site is not located within a specified AQMA.

The infrastructure includes the following features:

An impermeable concrete surface is laid across the entire site to create a sealed impervious base. The site is kerbed with linear gullies to allow for the containment and safe disposal of non-hazardous waste materials.

It has a fully functioning positive drainage system with interception prior to discharge into the public sewer. A piped mains water supply is available from existing services on the access road.

There are a number of offices provided for the weighbridge operator(s) Site Manager and separate amenity facilities for site staff.

Operating Times:

The site is permitted to receive, process and despatch waste and other materials at the times shown:

Monday to Friday 07.00 to 18.00

Saturday 07.00 to 14.00

Sunday & Public Holidays No Operations

The site is currently permitted to accept non-hazardous household, commercial and industrial waste together with wastes arising from construction and demolition .

The site is bordered to the west by a concrete batching plant and adjoining sewage treatment works. Immediately to the north and east lies Mid Kent Metal recycling and further afield to the north, Tunbridge Wells Municipal Depot. Tunbridge Wells Civic Amenity site is located some 400m to the west.

The site is located to the north of a larger industrial / commercial estate that comprises various businesses, from food outlets to DIY stores.

The permit area is approximately 1,800m² with a perimeter boundary of 175m, measuring 54m x 33m approximately.

2. Permitted Activities

The operations at the facility may be briefly summarised as follows:

Acceptance of non-hazardous industrial commercial, construction demolition and inert wastes for treatment to recover individual waste types.

Waste is treated by sorting and segregation into different components in preparation for further off-site treatment and recovery. In accordance with the waste hierarchy, landfill as a means of disposal, shall only be considered where treatment has no further value or proves demonstrably uneconomical, or where emergency situations require disposal as the sole option.

Table 1.

Description of specified activity	Limits of specified activity
R3 Recycling/reclamation of organic substances which are not used as solvents.	Physical / mechanical treatment including manual and mechanical sorting, separation, screening, baling, shredding, washing, crushing, or compaction of non-hazardous waste for disposal (no more than 50 tonnes per day) or recovery.
R4 Recycling/reclamation of metals and metal compounds	Subject to any other requirements of this permit waste shall be stored for no longer than 1 year prior to disposal or 3 years prior to recovery.
R5 Recycling/reclamation of other inorganic materials.	The capacity of the site for non-hazardous waste subject to a R3 activity (Biological treatment only) shall not exceed 75 tonnes per day.
R13 Storage of waste pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced)	No more than 50 tonnes per day of non-hazardous waste to be treated at the site under D9 activity. Waste types as specified in table 2.1
D15 Storage of wastes pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where it is produced)	
D9 Physico-chemical treatment	
D14 Repackaging prior to submission to any of the operations numbered D1 – D13.	

2.1 The present permitted tonnage limits:

The Permitted Tonnage limits are set out in the Permit (App I) and in Table A pp VII) The total tonnage of waste received on site will not exceed 50,000 tonnes per annum.

This application to vary the existing permit includes the proposal to increase the permitted annual tonnage by 25,000 tonnes, taking the total permissible annual tonnage to 75,000 tonnes.

The site is further permitted to treat, and process wastes by manual and mechanical means, consisting of manual sorting, separation, screening, baling, crushing and compaction in order to recover any materials suitable for recycling, the objective of reducing the amount of waste to be sent to landfill.

The maximum amount of waste that may be stored on site at any time is 2,000 tonnes

2.2 Waste Types

Table 1, List of wastes.

Table S2.1 Permitted waste types and quantities for household, commercial and industrial waste transfer station	
Maximum quantity	The total quantity of waste accepted at the site for the above activity shall be less than 75,000 tonnes a year.
Exclusions	wastes having any of the following characteristics shall not be accepted: <ul style="list-style-type: none"> • Consisting solely or mainly of dusts, powders or loose fibres • Wastes that are in a form which is either sludge or liquid
Waste code	Description
15	Waste packaging, absorbents, wiping cloths, filter materials and protective clothing not otherwise specified
15 01	packaging (including separately collected municipal packaging waste)
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
16	wastes not otherwise specified in the list

16.01	end-of-life vehicles from different means of transport (including off-road machinery) and wastes from dismantling of end-of-life vehicles and vehicle maintenance (except 13, 14, 16 06 and 16 08)
16 01 17	ferrous metal
16 01 18	non-ferrous metal
16 01 19	plastic
16 01 20	glass
17	construction and demolition wastes (including excavated soil from contaminated sites)
17 01	concrete, bricks, tiles and ceramics
17 01 01	concrete
17 01 02	bricks
17 01 03	tiles and ceramics
17 01 07	mixtures of concrete, bricks, tiles and ceramics other than those mentioned in 17 01 06
17 02	wood, glass and plastic
17 02 01	wood
17 02 02	glass
17 02 03	plastic
17 03	bituminous mixtures, coal tar and tarred products
17 03 02	bituminous mixtures other than those mentioned in 17 03 01
17 04	metals (including their alloys)
17 04 01	copper, bronze, brass
17 04 02	aluminium
17 04 03	lead
17 04 04	zinc
17 04 05	iron and steel
17 04 06	tin
17 04 07	mixed metals
17 04 11	cables other than those mentioned in 17 04 10
17 05	soil (including excavated soil from contaminated sites), stones and dredging spoil
17 05 04	soil and stones other than those mentioned in 17 05 03
17 05 08	track ballast other than those mentioned in 17 05 07
17 06	Insulation materials and asbestos – containing construction materials
17 06 04	insulation materials other than those mentioned in 17 06 01 and 17 06 03
17 08	gypsum-based construction material
17 08 02	gypsum-based construction materials other than those mentioned in 17 08 01
17 09	other construction and demolition wastes
17 09 04	mixed construction and demolition waste other than those mentioned in 17 09 01, 17 09 02 and 17 09 03
19	Wastes from waste management facilities, off-Site waste water treatment plants and the preparation of water intended for human consumption and waste for industrial use.

19 12	wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified
19 12 12	other wastes (including mixtures of materials) from mechanical treatment of wastes other than those mentioned in 19 12 11
20	municipal wastes (household waste and similar commercial, industrial and institutional wastes) including separately collected fractions
20 01	separately collected fractions (except 15 01)
20 01 01	paper and cardboard
20 01 02	glass
20 01 10	clothes
20 01 11	textiles
20 01 38	wood other than that mentioned in 20 01 37
20 01 39	plastics
20 01 40	metals
20 02	garden and park wastes (including cemetery waste)
20 02 01	biodegradable waste
20 02 02	soil and stone
20 02 03	other non-biodegradable wastes
20 03 01	mixed municipal waste

It is proposed to include EWC 19 12 12 within the list of wastes accepted at the site in recognition of waste emanating from waste transfer stations with minimal treatment capabilities.

19 12 12	other wastes (including mixtures of materials) from mechanical treatment of wastes other than those mentioned in 19 12 11*
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It is proposed by the operator to add EWC 20 03 01 to the approved list of wastes because this waste type is known to be recyclate rich and widely available. In addition, the company are now operating their own collection vehicles and due to the absence of this waste code on their permit, waste deliveries are diverted to third party facilities, and the result is detrimental to their business model.

EWC 20 03 01 consists of the following items:

- Paper and cardboard
- Wood
- Plastic
- Film
- Mixed metal
- Occasional brick pieces and soil

This waste type shall be accepted pursuant to existing Waste Acceptance Procedures which is stated in this document and other supporting documents and segregated in the manner described throughout the supporting management plans. But for the purpose of completeness, a brief description is given here:

Following conformity of the waste and documentation at the weighbridge the vehicle will be directed to the tipping point which is in the location of the waste handling grab. This allows the waste load to be broken for visual inspection and large recyclates to be removed mechanically and the remainder manually sorted into individual waste types.

The treatment consists of:

Manual pre-sorting to remove waste types such as cardboard, paper, wood and metal. Then the waste will pass through a screener to segregate hardcore type material and soil leaving the smaller fractions of wood, metal and those items that have no further use.

The application to vary the existing permit submitted to the National Permitting Service on 22nd July 2022 includes the proposal to operate a sink float tank whereby waste is passed through the water bath to separate heavy and light fraction particles. This process has a greater recovery rate than traditional screening and combining the two activities renders a high rate of recovery.

The potential for odour release from this waste type has been identified and controls established in the Odour Management Plan submitted in support of the permit variation. Once segregated, individual waste types recovered from EWC 20 03 01 are stored locally in bays awaiting transport from site. The manner in which the waste is stored, location and duration on site is mentioned in the Fire Prevention Plan

3. Management Systems

The site, its operations in respect of waste acceptance, treatment and transfer shall be conducted pursuant to the requirements of “The Environmental Protection (Duty of Care) Regulations 1994. Which imposes upon the permit holder:

“Section 34(1) of the Environmental Protection Act 1990 imposes a duty of care on any person who imports, produces, carries, keeps, treats or disposes of controlled waste or, as a broker, has control of such waste. The duty requires such persons to ensure that there is no unauthorised or harmful deposit, treatment or disposal of the waste, to prevent the escape of the waste from their control or that of any other person, and on the transfer of the waste to ensure that the transfer is only to an authorised person or to a person for authorised transport purposes and that a written description of the waste is also transferred”.⁽¹⁾

(1) The Environmental Protection (Duty of Care) Regulations 1991

The Management Systems cover all aspects of operations and aim to effectively manage the impact of the business on the environment including the health and safety of staff. The key documents include:

- a) Documents: Procedures to set out how operations shall be undertaken to minimise the potential impact on the environment and local amenities. Identify risks, prepare and implement procedures to reduce the likelihood of harm from the operation.

b) Forms on which to record information and provide evidence of the system functionality.

The overall operations will be 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 displayed on the office notice board. The TCM and Site Supervisor will both carry out similar functions on site, with the TCM providing the overall management to ensure compliance.

The supervisor 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.

Other site personnel will include administrative staff and site operatives. All personnel will have access to a copy of the Environmental Permit and pertinent management plans.

4. Conclusion

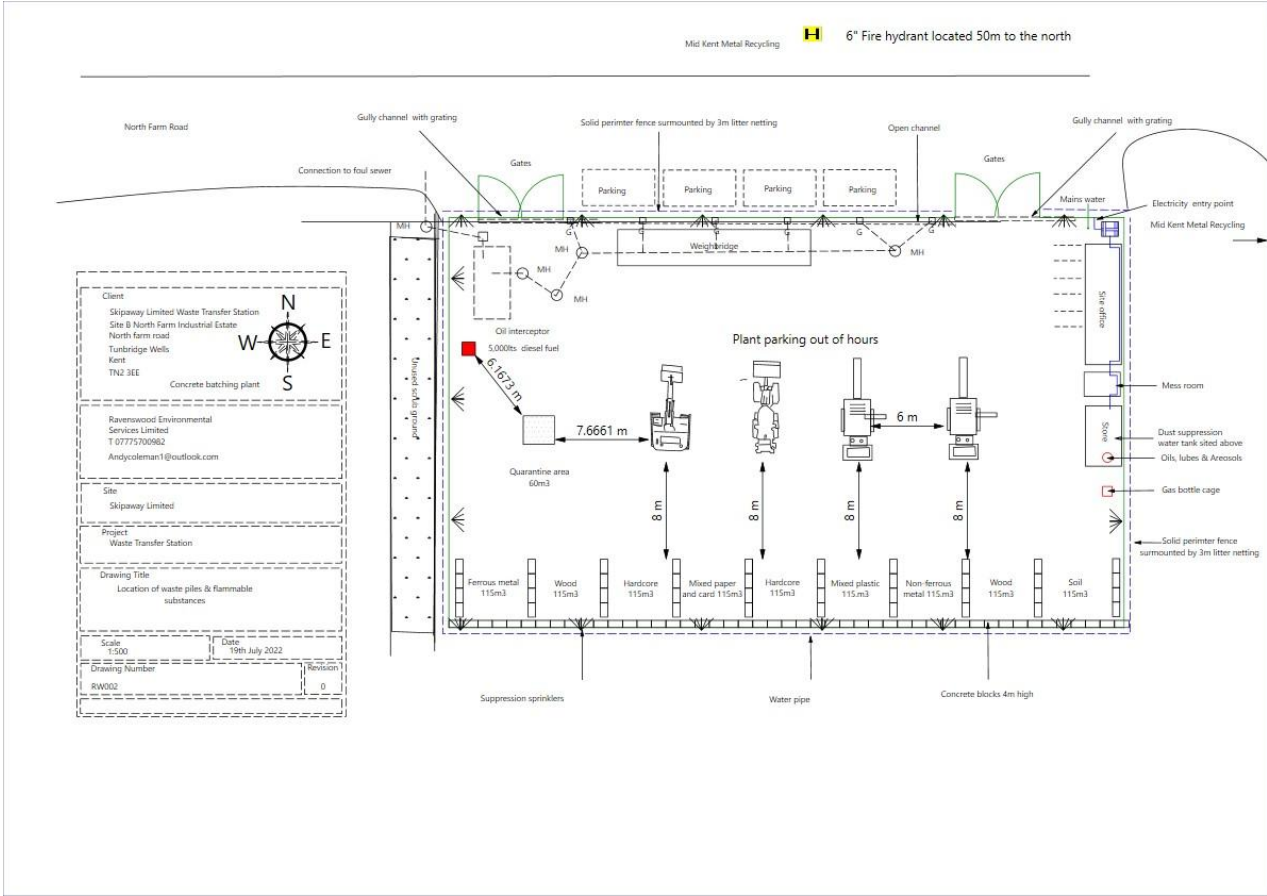
In respect of the foregoing, it is concluded that the application to vary the existing permit be granted and by the correct implementation of the management plans the operator has the technical ability and resources to operate the site in accordance with the conditions of a permit.

APPENDIX A

Site Location



Site Layout Plan



APPENDIX C

Permit Boundary

