

Dear Rebecca

I acknowledge receipt of your response on 07/02/19. I have looked through the information that you have provided.

Thanks for the following clarification.

## **TCM**

We are able to proceed with duly making on the basis of the explanation that you have provided. However please note that if Nick Towns is unable to supply the relevant certificates during determination we will have to restrict the TCM to Andy alone at permit issue.

## **Nicks WAMITAB certificates are attached**

## **Noise**

We are happy to wait until the deadline to receive the revised Noise Impact Assessment (NIA). Regarding the Noise Management Plan (NMP), while we prefer separate standalone documents for the NIA and NMP, if it is not possible to produce a NMP at present as long as the mitigation details are in a separate section in the NIA then this may be suitable for duly making. Please note that further information may be requested during determination.

## **Please find attached the calculations done, in accordance with BS4142.**

In response to the rest, Rosie Pits from Wardell-Armstrong has said the following:

### **Below are the responses to the EAs information requests:**

- **BS4142 Assessment calculations – attached;**
- **Engineering specifications of barriers – There will be a 3m high, 1m wide concrete block barrier along the south eastern and south western site boundaries and a 2.4m high, 0.6m wide along the northern as shown on the attached plan. BS8233:2014 Guidance on Sound Insulation and Noise Reduction for Buildings states that a precast concrete wall panel not less than 175mm thick and not less than 415 kg/m<sup>2</sup> will have a noise reduction index of 50 to 54dB. The method of calculation used for level of attenuation the barrier will provide is that shown in Chart 9 of the Calculation of Road Traffic Noise;**
- **There are no fixed locations for the plant as all of the plant will be mobile. There is a proposed working area, where plant will be operated, of approximately 50m by 50m as shown on the attached;**
- **The stone crusher has been specified in the noise report as this will be loudest equipment used on the site and therefore represents the worst case scenario in terms of noise impact. The stone crusher has a derived sound power level of 96dB and is 3.5m in height. The stone crusher is mobile and therefore directivity should not be a concern. It is confirmed that the stone crusher will be in use 2 to 3 times a week for 1 to 2 hours each time;**
- **The site roads are shown in Figure 8 of the Traffic Assessment attached. The traffic numbers are shown on the Table on page 14 of the attached Traffic Assessment. Traffic Speeds on the access roads will be less than 20mph. The vehicle sound power levels are not yet known, but the sound power level for standard tipper trucks is approximately 100dB and approximately 110dB for an articulated lorry; and**
- **The corner grid references of the proposed shed on site are as follows ST 36202 33959, ST 3621033966, ST 3622 533952, ST 36217 33944. The height of the shed is 7.5m high.**

There are some things that we need further clarification about.

## Part B4, Table 1a

### Tonnages

In your response it states that until the site is operational the daily tonnages that will be processed are not known. If waste operations exceed certain limits then they become installations under the Industrial Emissions Directive (IED). The limit for treatment of non-hazardous waste for recovery is 75 tonnes per day. This is the aggregation of the following activities.

“Recovery or a mix or recovery and disposal of non-hazardous waste with a capacity exceeding 75 tonnes per day (or 100 tonnes per day if the only waste treatment is anaerobic digestion) involving one or more of the following activities and excluding activities covered by Council directive 91/271/EEC by-

- (i) biological treatment;
- (ii) pre-treatment of waste for incineration or co-incineration;
- (iii) treatment of slags and ashes;
- (iv) treatment in shredders of metal waste, including waste electrical and electronic equipment and end-of-life vehicles and their components.”

If your facility exceeds 75 tonnes then it is not a waste operation and you will need to apply for an installations permit instead. Please demonstrate that the facility is a waste operation.

**Tonnages for daily and weekly maximums have been added to the table. This is based on the maximums currently achieved at other Towns’ sites and is limited to the processing capacity of the machinery. So it is very much a maximum rather than a likelihood. The likelihood is much lower as more than one activity will take place each day and the processing area only has room for one activity to run at a time.**

### Waste codes

Two of the waste codes in the table do not seem to fit with the activity that you have applied for, 1.16.12 Physical treatment of non-hazardous waste.

In the row Inert waste Treatment Facility – Screening and crushing hardcore you have listed EWC 17 03 03. There is an EWC code 17 03 03\* Coal tar and tarred products, which is a hazardous waste. This waste type cannot be treated under any non-hazardous activity. 17 03 03\* was not included in the original list of wastes in your application. Please confirm that you are not going to accept 17 03 03\* Coal tar and tarred products. If you are treating this waste code then you cannot have a permit for treating non-hazardous waste and will need to withdraw this application and apply for a permit for a hazardous waste activity.

**17 03 03 was a typo and has been amended to 17 01 03. We are not taking any hazardous waste.**

You have also included the waste type EWC 07 01 01. There is an EWC code 07 01 01\*. As you have not applied for any 07 waste codes originally and 07 01 01\* is aqueous washing liquids and mother liquids which not a waste type that can be crushed I presume that this is an error. There is a waste code 17 01 01 concrete. Please confirm that there was a typo and that you want 17 01 01.

**You are absolutely correct. This was a typo and has been amended to 17 01 01**

### Dust Management Plan

#### Details of other sources of dust within 1 km

I note that you are currently working on this question. I can confirm that yes, the information required is a list of other locations that may produce dust. This was requested based upon the Dust and Particulate Emissions Management Plan (DEMP) template version 10 (attached). Under section 1.1 Sensitive receptors it says:

“You must also consider the amenity impact of dust and other emissions within the 1000m radius of your site. Do not forget to consider clean industry and manufacturing processes such as, but not limited to, powder coaters and paint shops, offices, diesel generators, busy roads, power stations, food manufacturing and food outlets, agricultural land, the location of solar panels or air conditioning systems in the near vicinity, and areas of car parking.”

The DEMP is referring to other local sources of dust and particulates and suggests that this information is put in a table.

**Detail how you intend to break the source-pathway-receptor model for each of the receptors for your dust sources**

While the information you provided in section 3.13 of your plan is useful we need more specific information for each receptor. The DEMP has a table 3.1: Source-Pathway-Receptor Routes, which shows the level of detail required

**Please find attached an updated version of the dust management plan, containing extra requested details.**

**We are still waiting for the dust suppression system to be added to the site plan and will forward on as soon as it's received from the CAD technician.**