EPR PERMIT VARIATION APPLICATION

N&P Hartlepool MRF Ltd

EPR/GP3399LG

Prepared by:

Sol Environment Ltd

Date:

January 2025

Project or Issue Number:

SOL_24_P101_N+P

Sol Environment Ltd | Malvern | Bristol | Edinburgh
enquiries@sol-environment.co.uk | t. +44(0)1684 572727 (Switchboard) | +44(0)117 9372811 (Bristol)

VERSION CONTROL RECORD				
Contract/Proposal Number:		SOL_24_P101_N+P		
Authors Name:		Charlie Holmes		
Signature:				
Version	Description of Status	Date	Reviewer Initials	Authors Initials
1	First Submission to the Environment Agency	14th January 2025	SR	CH

Contents

Index of Tables

Index of Figures

NON TECHNICAL SUMMARY

This document has been prepared on behalf of N&P Hartlepool MRF Ltd ('*N+P'* or '*The Applicant'* hereafter) by Sol Environment Ltd and provides supporting evidence as required by Environmental Permit Application Forms Part C2 and C3 issued by the Environment Agency (EA).

N&P is making this application to carry out a *'Normal'* Variation of their existing EPR permit under The Environmental Permitting (England and Wales) Regulations 2018 (as amended) to include the storage of SRF pellets and bales and the operation of a Hammer Mill within the site operations.

The subject site is located at Material Recycling Facility, Hartlepool Thomlinson Road, Longhill Industrial Estate, Hartlepool TS25 1NS.

The site is currently permitted under EPR/GP3399LG to process 300,000 tonnes per annum of a variety of different non-hazardous waste types such as wood, soil and aggregates to produce RDF from residual wastes from other waste processing sites however this no longer accurately reflects the activities carried out on site. This variation is being made to address the following activities that will be carried out on site:

- The storage of Solid Recovered Fuel (SRF) pellets and bales. This material is produced at the Subcoal Productions TSP Ltd (EPR/SP3005PX) material recycling facility in Teesside and will be stored at Hartlepool prior to transfer off site for use as a fuel in energy from waste plants, cement kilns or similar. The site intends to store no more than 10,000 tonnes at any given time, distributed across the designated areas below:
    - The 'White Shed' and the 'RDF Shed' to store approximately 6,500 tonnes of SRF pellets;
    - The 'Black Sand Shed' to store approximately 500 tonnes of SRF pellets and pulverised SRF material; and
    - External hardstanding areas to store approximately 3,000 tonnes of baled SRF in the event that the Teesside site has reached capacity.
- The operation of a Hammer Mill located in the Black Sand Shed which will process a portion of the SRF pellets to produce pulverised alternative fuel (PAF), to be exported off site for use within cement kilns. The Hammer Mill will process approximately 163 tonnes per day equating to a total of 67,000 tonnes per annum.

All pellets and bales are produced at the Subcoal Productions facility in Teesside, and are stored onsite until such a time they are cleared for export to an offsite customer. It is proposed that up to 150,000 tonnes per annum of pellets and bales will be accepted on site.

The permitted activities currently meet the definition of an '*Installation'* by virtue of Schedule 1:

- Section 5.4 'Disposal, recovery or a mix of disposal and recovery of non-hazardous waste' Part A(1)(b)(ii) *Recovery or a mix of 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 activity is anaerobic digestion) involving one or more of the following activities, and excluding activities covered by Council Directive 91/271/EEC—*
  (ii) Pre-treatment of waste for incineration or co-incineration

Although no longer operating as a MRF, the introduction of the Hammer Mill meets the definition of a Section 5.4 Part A(1)(b)(ii) and therefore there will be no amendment to the permitted main Activity on site.

Emissions to Air

There will be no proposed emissions to air as a result of this permit variation.

The proposed site is located in a long-established industrial area. The site is approximately 300m from the nearest residential area, therefore is not located in a sensitive location.

The site is operated in accordance with the sites existing Odour Management Plan provided in *Annex F – Odour Management Plan.*

Emissions to Controlled Water

The majority of the site drainage system will remain as currently permitted. There is no process water arising from the operation of the plant.

Water falling onto the roof of the pellet storage buildings is collected by rainwater gutters into the sealed surface water drainage system which will be equipped with stage 1 interceptor systems and isolation valves. The drainage system has been designed to ensure that any contaminated site water or fire water run off is retained and only clean uncontaminated surface water is discharged from site.

All fire water management will remain as currently permitted as part of the site's Fire Prevention Plan.

Emissions to Sewer

The site has an existing sewer connection however there will be no additional emissions to sewer as a result of this permit variation.

Emissions to Land

There are no emissions to land as a result of this permit variation.

Waste / Product Management

The following waste materials will be stored and exported off site:

- SRF pellets and bales produced at the Subcoal Productions TSP Ltd site in Teesside to be exported off site for energy recovery; and
- Pulverised Alternative Fuel (PAF) material produced by the proposed Hammer Mill to be exported off site for use within cement kilns.

Odour

There will be no odour emissions as a result of the permit variation.

The SRF material is devoid of food waste and organic fines and therefore has very low odour potential. There is no potential for odour from the external storage of baled waste as the bales will be sufficiently wrapped.

Additionally, the site has an existing Odour Management Plan which is provided in *Annex F – Odour Management Plan.*

Dust

The introduction of the Hammer Mill does potentially increase the potential for dust emissions on site. However, the pellets are unloaded, stored and processed internally within an enclosed system, reducing the risk of dust emissions from the process.

Additionally, the site operates in accordance with a Dust Management Plan which is provided within *Annex E – Dust Management Plan.*

Noise

The introduction of the new hammer mill will introduce a new process to the sites operation. However, as the permitted MRF is no longer operational and the Hammer Mill will only be operated within an enclosed building within a heavily industrialised area, there will be no increase in noise emissions as a result of the permit variation.

1 INTRODUCTION

N&P Hartlepool MRF Ltd is making this application to carry out a *'Normal'* Variation of their existing EPR permit under The Environmental Permitting (England and Wales) Regulations 2018 (as amended) to include the storage of SRF pellets and bales and the operation of a Hammer Mill within the site operations.

The subject site is located at Thomlinson Road, Longhill Industrial Estate, Hartlepool TS25 1NS.

The site is currently permitted under EPR/GP3399LG to process 300,000 tonnes per annum of a variety of different non-hazardous waste types such as wood, soil and aggregates to produce RDF from residual wastes from other waste processing sites however this no longer accurately reflects the activities carried out on site. This variation is being made to address the following activities that will be carried out on site:

- The storage of Solid Recovered Fuel (SRF) pellets and bales. This material is produced at the Subcoal Productions TSP Ltd (EPR/SP3005PX) material recycling facility in Teesside and will be stored at Hartlepool prior to transfer off site for use as a fuel in energy from waste plants, cement kilns or similar. The site intends to store no more than 10,000 tonnes at any given time, distributed across the designated areas below:
    - The 'White Shed' and the 'RDF Shed' to store approximately 6,500 tonnes of SRF pellets;
    - The 'Black Sand Shed' to store approximately 500 tonnes of SRF pellets and pulverised SRF material; and
    - External hardstanding areas to store approximately 3,000 tonnes of baled SRF in the event that the Teesside site has reached capacity.
- The operation of a Hammer Mill located in the Black Sand Shed which will process a portion of the SRF pellets to produce a pulverised SRF material, to be transported off site for use within cement kilns. The Hammer Mill will process approximately 163 tonnes per day equating to a total of 67,000 tonnes per annum.

All pellets and bales are produced at Subcoal Productions facility in Teesside, and are stored onsite until such a time they are cleared for export to an offsite customer. It is proposed that up to 150,000 tonnes per annum of pellets and bales will be accepted on site.

The permitted activities currently meet the definition of an '*Installation'* by virtue of Schedule 1:

- Section 5.4 'Disposal, recovery or a mix of disposal and recovery of non-hazardous waste' Part A(1)(b)(ii) *Recovery or a mix of 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 activity is anaerobic digestion) involving one or more of the following activities, and excluding activities covered by Council Directive 91/271/EEC—*
  (ii) Pre-treatment of waste for incineration or co-incineration

Although no longer operating as a MRF, the introduction of the Hammer Mill meets the definition of a Section 5.4 Part A(1)(b)(ii) and therefore there will be no amendment to the permitted main Activity on site.

The remainder of this application support document is structured accordingly:

- Section 2: Provides a detailed planning history of the site and associated activities;
- Section 3: Provides specific nature of the proposed changes associated with the variation application;
- Section 4: Provides specific nature and detailed description of the emissions to air and water associated with the Installation;
- Section 5:Provides details of all monitoring associated with the Installation; and
- Section 6: Provides an Environmental Impact and Assessment of the varied Installation.

All technical appendices associated with the Installation are included within the following:

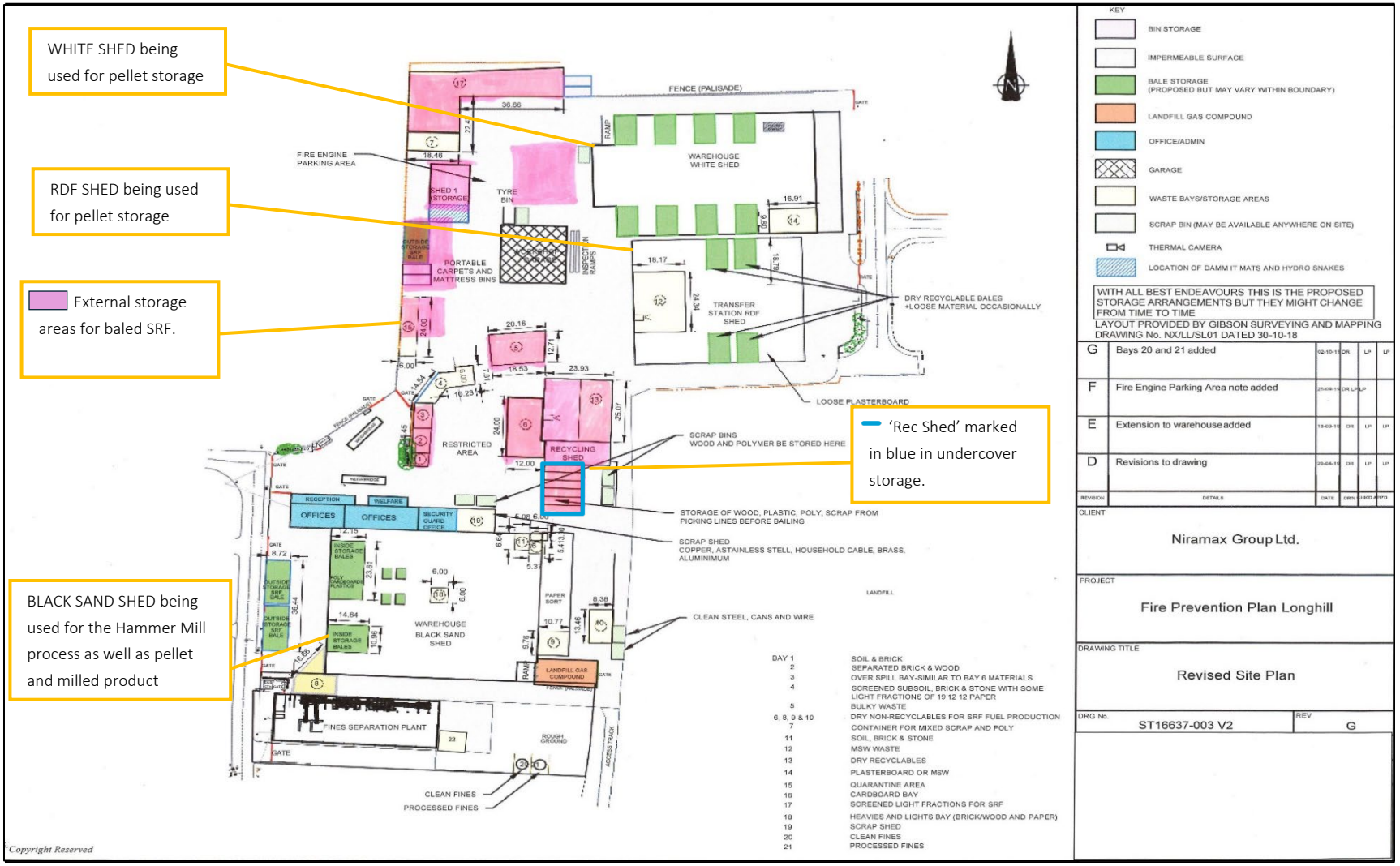
- Annex A: Site Plans;
- Annex B: Technical Information;
- Annex C: Environmental Risk Assessment;
- Annex D: Fire Prevention Plan;
- Annex E: Dust Management Plan;
- Annex F: Odour Management Plan;
- Annex G: Existing Permit;
- Annex H: Certification.

The site location, installation boundary and site layout is provided overleaf in Figure 1.1 and 1.2.

There will be no changes to the location or permit boundary as part of this variation.

Figure 1.1: Site Location and Installation Boundary

Figure 1.2: Site Layout



2 PERMITTING & PLANNING HISTORY

The sites permitting and planning history is provided in Table 2.1. The current permit has been included within *Annex G – Existing Permit* of this document and the details pertaining to all known permits and planning permissions are provided in Table 2.1 below.

Table 2.1: Permitting and Planning History

Permitting History

Reference	Description	Status	Date Granted
EPR/GP3399LG/V005	[This permit variation application]	-	-
EPR/GP3399LG/T005	Application to transfer the permit in full from Niramax Group Limited to N&P Hartlepool MRF Limited.	Permit Transferred	03/08/2023
EPR/GP3399LG/V004	Application to change the storage conditions to fit with site requirements and existing site plant; and an extension to the permitted area site; enclosing specific waste activities.	Permit Varied	22/06/2021
EPR/GP3399LG/V003	Application to vary and update the permit to IED conditions, increase the permitted waste capacity, include additional areas to the permit boundary and include waste operations currently conducted under waste exemptions.	Permit Varied	29/09/2017
EPR/GP3399LG/T001	Permit transferred from S.W.S Limited to Niramax Group Limited.	Permit Transferred	05/05/2010
EPR/GP3399LG/V002	Application for a permit variation to: Amend the site boundary, incorporating the area formerly occupied by permit EAWML 66057 on surrender of that permit; Update the permitted waste codes to EWC codes; Amend the permitted annual tonnage of waste.	Permit Varied	22/12/2009
EAWML 60068		Permit Varied	08/02/2002
CLE 103	Change of company name. Varied Permit issued to North Tees Waste Management Limited.	Permit Varied	07/02/1982
EPR/ZP3333NH	Permit issued by County Council of Cleveland.	Permit Issued	12/07/2013

Planning History

Reference	Description	Status	Date Granted
H/2017/0367	Erection of 22m high 600mm dia metal flue with supporting pole (to project approximately 10.7m above ridge line of shed) to serve biomass boiler.	Granted	02/11/2017
H/2015/0203	Erection of an electric sub station and associated 2.4m high palisade and timber fencing, and 1m high barrier.	Granted	05/08/2015
H/2012/0601	Erection of compound containing gas engines and associated equipment for the control of landfill gas and generation of electricity.	Granted	05/04/2013
H/2009/0435	Screening opinion for proposed upgrading and extension of existing waste management facility.	Granted	27/08/2009
H/2005/5955	Siting of a steel bunded fuel tank.	Granted	11/01/2006
HLAW/2001/0451	Application for a Certificate of Lawful Development in respect of use of waste transfer	Granted	11/01/2002

HFUL/1999/0293	Renewal of planning permission H/VAR/0166/98 for use of part of site as a material composting station (permanent permission).	Granted	21/02/2000
HVAR/1998/0166	Renewal of permission for use of part of site as a material composting station.	Granted	08/06/1998
HFUL/0000/0281	Erection of a steel framed building to house paper processing machinery.	Granted	01/01/1901

3 DESCRIPTION OF PROPOSED VARIATION

3.1 Description of the Proposed Changes

N&P Hartlepool MRF Ltd is making this application to carry out a *'Normal'* Variation of their existing EPR permit under The Environmental Permitting (England and Wales) Regulations 2018 (as amended) to ensure that the permit accurately reflects the activities operated on site which are as follows:

- The storage of pellets internally within the White Shed, RDF Shed and Black Sand Shed;
- The external storage of baled SRF; and
- The operation of a Hammer Mill located in the Black Sand Shed which will process a portion of the pellets to produce PAF, to be transported off site. The Hammer Mill will process approximately 163 tonnes per day equating to a total of 67,000 tonnes per annum.

Due to the site already being permitted to as a Section 5.4 Part A(1)(b)(ii), this permit variation does not introduce a new Installation Activity. The sites existing permit also allows the storage of processed materials on site.

It is recognised that the current permit allows activities not currently carried out on site, however N&P would like to keep these activities on the permit to allow flexibility in the future.

Any proposed changes to the Listed Activities are depicted in Table 3.1 in RED which mainly relates to the increase in product storage as a result of this permit variation.

Table 3.1: Activities			
Activity Reference	**Activity listed in Schedule 1 of the EP Regulations**	**Description of specified activity**	**Limits of specified activity and waste types**
A1	S5.4 A(1) (b) (ii) Recovery or a mix of recovery and disposal of non-hazardous waste with a capacity exceeding 75 tonnes per day involving pre-treatment of waste for incineration or co-incineration	R3: Recycling/reclamation of organic substances which are not used as solvents R4: Recycling/reclamation of metals and metal compounds R5: Recycling/reclamation of other inorganic materials	From the receipt of waste to despatch off site for recovery. Treatment consisting only of sorting, separation, screening, baling, shredding, crushing or compacting waste. Treatment (internally) of waste only in an enclosed building and/or if carried out externally shall only be in enclosed equipment (e.g. conveyor belts). All treatment shall be carried out on an impermeable surface with a sealed drainage system. Operations shall only be conducted in area marked in green on the site plan in Schedule 7 of this permit. Waste types suitable for acceptance are limited to those in Table S2.2.
Directly Associated Activities			
A2	Storage of waste pending recovery or disposal	R13: Storage of waste pending the operations numbered R1 to R12 (excluding temporary storage,	From receipt of waste to treatment. Storage of waste in an enclosed

		pending collection, on the site where it is produced)	building and on an impermeable surface with sealed drainage system. No waste to be stored for more than 3 months. Waste types suitable for acceptance are limited to those specified in Table S2.2.
			From receipt of waste to treatment. Storage of waste on an impermeable surface with sealed drainage system. No waste to be stored more than 3 months. Wastes having any of the following characteristics shall not be stored outside the building: Biodegradable or odorous material;
			Materials consisting solely or mainly of dusts, powders or loose fibres. Waste types suitable for storing outside the building are limited to only those below: • 20 03 07 bulky waste • 19 12 12 clean and processed fines (screened subsoils, brick and stone), dry non-recyclable waste for making fuel consisting of cardboard, paper, plastic, wood (which may be contaminated with rubble). • 19 12 02 scrap metal containing minor plastic/poly fraction • 19 12 09 minerals (for example sand, stones)
A3	Storage of processed materials	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)	From storage of processed materials to despatch off site for recovery. Baled RDF/SRF 19 12 10 is suitable to be stored externally in designated storage areas.
A4	Raw materials storage	Storage of raw materials	From the receipt of raw materials to despatch for use within the facility.
A5	Discharge of surface water	Discharge of surface water from the treatment and storage areas of the site	From the collection of drainage from operational areas to discharge off-site via public foul drains.
Activity Reference	**Description of activities for waste operations**		**Limits of specified activity**
A6 (waste transfer)	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) D15: Storage pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where the waste is produced)		Temporary storage of waste prior to treatment or dispatch off-site for recovery or disposal. Treatment consisting only of physical sorting or separation of waste into different components, physical mixing

	R3: Recycling/reclamation of organic substances which are not used as solvents R4: Recycling/reclamation of metals and metal compounds R5: Recycling/reclamation of other inorganic compounds 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)	or bulking of solid wastes of the same or different types, where there are no resulting changes in the chemical composition of the wastes or its different compounds. Import and storage of pellets and baled SRF. With the exception of specified waste (note 1), all treatment and storage of waste shall be carried out in an enclosed building and/or enclosed equipment (e.g. conveyor belts) or container and on an impermeable surface with sealed drainage system. Buildings or containers shall meet the following requirements: Buildings and/or enclosed equipment (e.g. conveyor belts) or containers shall be designed, constructed and maintained to prevent ingress of rain and surface water; Rain and uncontaminated surface water shall be kept separate from contaminated water and other liquids; Containers containing waste shall be stored on an impermeable surface with sealed drainage system. No waste to be stored for more than 3 months. Operations shall only be conducted in the area marked in green on the site plan in Schedule 7 to this permit. Waste types suitable for acceptance are limited to those specified in Table S2.3.

Activity Reference	Activity listed in Schedule 1 of the EP Regulations	Description of specified activity and WFD Annex I and II operations	Limits of specified activity and waste types
A7 (wood processing)	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) R3: Recycling/reclamation of organic substances which are not used as solvents	Physical treatment of wood wastes consisting only of sorting, separation, cutting, pulverising, shredding, and chipping for recovery.	Secure storage of wastes at the place where it is to be treated. The maximum storage of wood waste on site at any one time shall be as defined in the approved Fire Prevention Plan for the facility. No waste to be stored for more than 3 months. Operations shall only be conducted in area marked in green on the site plan in Schedule 7 to this permit. Waste types suitable for acceptance are limited to those specified in Table S2.4.
A8 (soils & aggregates processing)	R13: Storage of waste pending any of the operations numbered R1 to R12 (excluding	Physical treatment of wastes consisting only of crushing, screening, sorting and separation for recovery.	Secure storage of wastes at the place where it is to be treated.

	temporary storage, pending collection, on the site where it is produced) R3: Recycling/reclamation of organic substances which are not used as solvents R5: Recycling/reclamation of other inorganic materials	Quantities of waste stored shall not exceed 10,000te in total at any one time. No waste to be stored for more than 3 months. Waste shall be stored and treated on hard standing or on an impermeable surface with sealed drainage system. Operations shall only be conducted in the red hatched area, with a green border on the site plan in Schedule 7 to this permit. Waste types suitable for acceptance are limited to those specified in Table S2.5.

3.2 Details of the Installation

3.2.1 Installation Boundary

No additional land is being added to the Installation Boundary as a result of this permit variation application. A figure showing the existing Installation Boundary is provided in Section 1, Figure 1.1.

Due to this, an updated Site Condition Report is not considered necessary as part of this permit application.

All activities take place within the Installation Boundary.

The area for soil and aggregates processing is separate from the rest of the site and is connected by one access track that runs between Sims Metal and the former landfill. Although no activities are currently taking place within this area, N&P would like to keep within the permit to allow flexibility in the future.

3.3 Site Drainage

The majority of the site drainage system will remain as currently permitted. There is no process water arising from the operation of the plant.

Water falling onto the roof of the storage buildings is collected by rainwater gutters into the sealed surface water drainage system which will be equipped with a stage 1 interceptor system and isolation valves. The drainage system has been designed to ensure that any contaminated site water or fire water run-off is retained with only clean uncontaminated surface water being discharged from site.

In the event of an emergency, isolation valves and dedicated sumps will prevent discharge of contaminated water to controlled waters, ensuring the containment of contaminated water on site. A sump and pump system will allow the collection of any contaminated water which will be appropriately disposed of offsite via tankers.

The site has an existing connection to public foul sewer.

Please refer to *Annex D – Fire Prevention Plan,* as well as the Site Drainage Plans provided within *Annex A – Site Plans* for more information.

3.4 Raw Materials

Waste Feedstocks

The site is currently permitted under permit EPR/GP3399LG to accept 300,000 tonnes per annum of non-hazardous mixed waste. There will be no amendments to the amount and types of waste accepted by the facility to allow flexibility in the future.

All wastes will be accepted on site in accordance with the sites existing waste acceptance procedures.

Raw Materials

The only raw materials as a result of this permit variation relate to the operation and maintenance of the Hammer Mill.

3.5 Description of the Proposed Changes

The amendments to the site activities resulting from this permit variation are the inclusion of pellet and baled storage areas and the operation of a Hammer Mill.

A total of 150,000 tonnes per annum of pellets and baled SRF produced at the Subcoal Productions TSP Ltd (EPR/SP3005PX) material recycling facility will be temporarily stored and transferred from the site for use as a fuel in energy from waste plants, cement kilns or similar. A maximum of 10,000 tonnes will be stored at any one time. The storage will take place within the following areas:

- The 'White Shed' and the 'RDF Shed' to store approximately 6,500 tonnes of SRF pellets;
- The 'Black Sand Shed' to store approximately 500 tonnes of SRF pellets and pulverised SRF material; and
- External hardstanding areas to store approximately 3,000 tonnes of baled SRF in the event that the Teesside site has reached capacity.

The site is already permitted for the internal and external storage of waste on hardstanding. External storage of bales will only take place if the Subcoal Productions site in Teesside has reached storage capacity.

All storage bays will limited to 450m^3 and will be managed in accordance with the strict requirements as detailed in the updated site FPP. Please refer to *Annex D – Fire Prevention Plan* for more information on how the storage area will be managed.

Layouts of the storage areas are provided in *Annex A – Site Plans.*

In addition to the above, approximately 67,000 tonnes of the pellets will be processed on site by the proposed Hammer Mill to produce a pulverised alternative fuel (PAF) which will be exported off site for use within cement kilns.

Incoming vehicles are directed to the loading bay within the Black Sand Shed where materials are either unloaded into storage bays or fed directly into the Hammer Mill hopper for immediate processing if there is no material waiting to be processed.

Pellets are fed into a hopper which transfers the waste onto a feed conveyor which regulates the throughput into the Happer Mill. This can range from 5 to 12 tonnes per hour. The pellets are then conveyed into the milling chamber, where rotating hammers pulverise them into a fine material. The processed output,

pulverised alternative fuel (PAF), is discharged via a screw feed into a dedicated bay for storage. A loading shovel will be used to transfer material from bays within the Black Sand Shed to an available vehicle, ready for transport off site.

The Hammer Mill has a dedicated filter system ensuring any dust emissions are captured within the process.

Pellets will be managed on a 'first in, first out' basis, with an operational aim to process incoming material directly upon delivery, minimising the need for temporary storage in bays. The site anticipates processing approximately 67,000 tonnes annually, with an approximate daily throughput of 163 tonnes. This system ensures efficient waste handling while supporting the site's objective of producing high-quality PAF material for energy recovery.

The specifications of the hammer mill can be found in *Annex B – Technical Information.*

All pellets and bales are to be stored for a maximum of 3 months. Under normal operation PAF will be discharged into a dedicated legio block bay within the Black Sand Shed to be stored for no longer than 2 months before being exported off site. In the circumstance that an available vehicle is ready for export off site, material can be fed directly from the screw feed into this vehicle for transport.

3.7 BAT Justification

The proposed variation does not change the purpose and function of the Installation, therefore a BAT Justification is not considered necessary for this application.

The site has been designed in accordance with BAT and will comply with the relevant standard and guidance requirements.

The Hammer Mill has been designed to be BAT and meet the requirements of the Waste Treatment BREF.

All storage on site has been designed to meet with the requirements of the latest revision of the EA Fire Prevention Plan Guidance.

3.8 Management System

The site will remain operating in accordance with the sites Environmental Management System.

The only amendments to the existing EMS is the FPP and DMP which has been updated to include the appropriate storage of the waste materials and the operation of the hammer mill, in accordance with Table 1.2 Operating Techniques in the sites existing permit.

The FPP is provided within *Annex D – Fire Prevention Plan.*

The DMP is provided within *Annex E – Dust Management Plan.*

The EMS Certification – ISO 14001:2015 provided within *Annex G – Certification.*

3.9 Operator Competence

There will be no change to the existing Technically Competent Personnel onsite as a result of this permit variation.

Darren Jones holds the relevant CIWM qualifications as required by the CIWM competency scheme. Please refer to *Annex H – Certification* for a copy of the CIWM certificates.

4 EMISSIONS AND THEIR ABATEMENT

4.1 Emissions to Air

There are no point source emission to air at the permitted site.

There will be no changes to the emissions to air as a result of this permit variation.

4.2 Emissions to Controlled Water

There are no emissions to controlled water from the site. The majority of the site drainage system will remain as currently permitted. There is no process water arising from the operation of the plant.

Water falling onto the roof of the pellet storage building is collected by rainwater gutters into the sealed surface water drainage system which will be equipped with stage 1 interceptor system and isolation valves. The drainage system has been designed to ensure that any contaminated site water or fire water run off is retained with only clean uncontaminated surface water being discharged from site.

In the event of an emergency, isolation valves and dedicated sumps will prevent discharge of contaminated water to controlled waters, ensuring the containment of contaminated water on site. A sump and pump system will allow the collection of any contaminated water which will be appropriately disposed of offsite via tankers.

All fire water will be contained on site and will be managed in accordance with the updated FPP provided within *Annex D – Fire Prevention Plan.*

4.3 Emissions to Sewer

The site has an existing public foul sewer connection which is detailed in Table 4.1 below.

Table 4.1: Emissions to Sewer

Emission Point	Source	Parameter	Limit	Reference Period	Monitoring Frequency	Monitoring Standard or Method
S1 on the site plan in schedule 7 emission to public foul sewer	Site surface water drainage	No parameters set	No Limit Set	-	-	-

There will be no additional emissions to sewer as a result of this permit application.

4.4 Emissions to Land

There are no emissions to land arising as a result of this permit variation.

4.5 Odour

Odour has not previously been an issue at site due to the sites odour mitigation measures and the location of the facility. The proposed site is located in a long-established industrial area. The site is approximately 300m from the nearest residential area, therefore is not located in a sensitive location.

The storage of pellets and bales at the facility does not create any additional potential odour impacts.

Additionally, the site has an existing Odour Management Plan which is provided in *Annex F – Odour Management Plan.*

4.6 Dust

The introduction of the Hammer Mill does potentially increase the potential for dust emissions on site. However, the pellets are unloaded, stored and processed internally within an enclosed system, reducing the risk of dust emissions from the process.

The Hammer Mill has a dedicated filter system ensuring any dust emissions are captured within the process.

Additionally, the site operates in accordance with a Dust Management Plan which is provided within *Annex E – Dust Management Plan.*

4.7 Noise

The introduction of the new hammer mill will introduce a new process to the sites operation.

However, as the permitted MRF is no longer operational and the Hammer Mill will only be operated within an enclosed building within a heavily industrialised area, there will be no increase in noise emissions as a result of the permit variation.

4.8 Waste Summary

The following waste materials will be stored and exported off site:

- SRF pellets and bales produced at the Subcoal Productions TSP Ltd site in Teesside to be exported off site for energy recovery; and
- Pulverised Alternative Fuel (PAF) material produced by the proposed Hammer Mill to be exported off site for use within cement kilns.

Please refer to Table 4.2 which provides the estimated quantities of waste on site.

Table 4.2: Product / Waste Summary

Waste	EWC Code	Approx. Quant (tonnes/yr)	Source	R / D Code	Environmental Fate
SRF Bales	19 12 10	75,000	Teesside Material Recycling Facility	R1 – Use as a fuel	Exported Off-Site for Energy Recovery
SRF Pellets	19 12 10	75,000	Teesside Material Recycling Facility	R1 – Use as a fuel	Exported Off-Site for Energy Recovery
Pulverised Alternative Fuel (PAF)	19 12 10	67,000	Hammer Mill Operations	R1 – Use as a fuel	Exported Off-Site for Energy Recovery

5 ENVIRONMENTAL MONITORING

5.1 Emissions to Air

There are no emissions to air from the Installation, therefore no monitoring is required.

5.2 Emissions to Controlled Water

There are no emissions to controlled water from the Installation, therefore no monitoring is required.

5.3 Emissions to Sewer

There are no monitoring requirements stated in the permit in relation to the sites sewer connection.

5.4 Emissions to Land

There are no process emissions to land arising from the proposed variation. Therefore, no monitoring is required.

5.5 Odour

All odour monitoring will be carried out in accordance with the sites existing Odour Management Plan provided within *Annex F – Odour Management Plan*

5.6 Dust

All dust monitoring will be carried out in accordance with the sites Dust Management Plan provided within *Annex E – Dust Management Plan.*

5.7 Noise

The site is not sensitive to noise and therefore no noise monitoring is considered necessary.

6 IMPACT TO THE ENVIRONMENT

6.1 Impacts to Air

There are no impacts to air as a result of the proposed variation.

6.2 Impacts to Controlled Waters

There are no impacts to controlled water as a result of the proposed variation.

6.3 Impacts to Land

There are no impacts to land as a result of the proposed variation.

6.4 Impacts to Sewer

There are no impacts to sewer as a result of the proposed variation.