Wetherby Skip Services Ltd

**Report No. 2405-016/R/005**
**14 June 2024**
**Revision 1**

# Quarry Works Deposit for Recovery Site

## Waste Acceptance Procedures

HOOPER-SARGENT LIMITED
Environmental Permitting Consultancy

# Document Control

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# Contents

# 1 Introduction

## 1.1 Background

This Waste Acceptance Report has been prepared by Hooper-Sargent Limited (HSL) on behalf of Wetherby Skip Services Limited (WSSL, the proposed Operator) who have applied for a bespoke Deposit for Recovery Environmental Permit (DfR Permit) for their Quarry Works site located on Field Lane in South Elmshall, near Wakefield (the Quarry Works Site). The DfR Permit application was selected for Duly Making checks in April 2024 and consequent to that the Environment Agency (Agency) requested more information in their email dated 26 April 2024. This CSM report seeks to address the following questions in the Agency Not Duly Made (NDM) request for additional information (the full list of information requested is detailed in the accompanying HSL cover letter referenced 2405-016/L/001):

9. *List of Wastes – Please clarify if the waste code 19 12 09 on the extant list are the waste materials imported to the site, or the end product of the onsite screening and crushing treatment for the imported waste materials.*

10. *List of Wastes – (i) Please prepare separate lists of wastes to set out (a) the waste codes of imported waste materials that will be directly deposited for recovery without being processed by the onsite screening and crushing treatment and (b) the waste codes of imported waste materials that will be processed by the onsite treatment. (ii) Please identify the waste code (19 12 09 or 19 12 12) for those end product of the onsite treatment which will be subsequently deposited for recovery. (iii) Please provide the annual tonnage of waste materials for the respective lists of wastes.*

    ***Reason:** The proposed waste codes for different activities on site are required to be separated. We also need the annual onsite waste treatment capacity to determine the related subsistence charges in the future.*

11. *Application Form Part B4, Table 1a – Please clarify if the proposed activity R10 needs to be changed to R5 - Recycling / reclamation of other inorganic materials.*

    ***Reason:** R10 is for the for improvement of soil quality or creation of final growth layer which may not be applicable for this application.*

Since submission of the permit application in November 2022, WSSL has reconsidered the practicality of importing waste for treatment on site prior to deposit in the DfR activity. Sustaining waste treatment on the Quarry Works Site is now not expected to be economically viable and the Operator now proposes to infill the void directly using suitable material imported from elsewhere. This will include inert soil and stones excavated from uncontaminated domestic and development sites, as well inert waste generated from quarry exploration and treatment of construction and demolition materials. By excluding treatment of waste on site, it is expected the proposed activity will now present a lower risk to sensitive receptors from noise and dust emissions.

### 1.1.1 Revisions to Application Documents

This report will fully supersede and combine the content of the following original application reports:

- Natural Resource Planning report referenced NRP-WSS-Permit-Dii V3: *Waste Acceptance Procedures* dated 20/10/2022; and,
- Natural Resource Planning report referenced NRP-WSS-Permit-Diii V2: *List of Wastes* dated 24 October 2022.

### 1.1.2 NDM Response

Items 9 to 11 in the NDM Request for more information are addressed in the following Sections of this report:

- Question 9 - Clarification of European Waste Catalogue (EWC) code 19 12 09: Section 2.4.3 – Waste Types
- Question 10 - List of Wastes: Section 2.4.3 – Waste Types
- Question 11 – Clarification of R-Codes: Section 2.1 – Waste Activities

### 1.1.3 Appropriate Measures

Environmental Agency Guidance has been referenced in the preparation of this report:

- Agency online *Appropriate Measures* guidance[1]
- *Develop and maintain management plans*[2]

### 1.1.4 Structure of Report

This Waste Acceptance Report follows the narrative of the waste management activities on site from waste reception to placement in the void as follows:

- Section 2 – Waste Acceptance Procedures
- Section 3 – Waste Storage
- Section 4 – Contingency Plans

[1] Non-hazardous and inert waste: appropriate measures for permitted facilities - Guidance - GOV.UK (www.gov.uk)
[2] Landfill operators: environmental permits - Develop and maintain management plans - Guidance - GOV.UK (www.gov.uk)

# 2 Waste Acceptance Procedures

## 2.1 Proposed Waste Management Activities

The deposit of appropriate waste as part of a Deposit for Recovery Activity (DfR) requires the following codes referenced from Annex II "Recovery Operations" of the Waste Framework Directive to be included in Table 2.1 of the DfR Permit:

- R13: Storage of wastes pending any of the operations numbered R5 and R10
- R5: Recycling or reclamation of other inorganic materials

It is not proposed to include recovery operation code R10 as there is no requirement to place a surface layer of material for agriculture or ecological benefit. The DfR activity is to create a development platform for residential housing, however it this time it is assumed any soils placed for gardens or landscaping will be from a non-waste source.

## 2.2 Appropriate Measures

This section addresses Appropriate Measure (AM) 3 which concerns the pre-acceptance, acceptance and tracking of waste received at the site for temporary storage where relevant and its subsequent placement. The Operator maintains a management system that ensures only permitted waste types can be accepted at the site for use in the waste treatment activity (AM3.1.1). This also ensures the non-hazardous wastes accepted are also appropriate to meet the requirements of the Waste Acceptance Criteria (WAC) for an inert landfill Site as detailed in Council Decision 2003/33/EC: *establishing criteria and procedures for the acceptance of waste at landfills pursuant to Article 16 of and Annex II to Directive 1999/31/EC* (the Annex to the Landfill Directive (LFD) - Council Decision 1999/31/EC). The type of material to be accepted at the DfR activity will be referenced in this report as meeting the "LFD Inert WAC".

Agency Guidance for the disposal of waste at landfills[3] is considered to be an appropriate standard to follow when determining similar procedures for deposit of waste as a recovery activity. That guidance has a 3 Level approach:

- Level 1 Checks – Basic Characterisation
- Level 2 Checks – Compliance Testing
- Level 3 Checks – On-Site Verification

Sections 2.4.1 to 2.4.3 details how the Operator will employ pre-acceptance checks to characterise the waste prior to it being brought to site and subject to compliance with that, when it arrives for delivery. Section 2.4.4 will consider compliance testing of material that meets the acceptance criteria before or after being brough to Site. Section 2.5 will detail the procedures for verifying the waste when it is brought to the Site for deposit.

[3] Dispose of waste to landfill - GOV.UK (www.gov.uk)

## 2.3 Non-Applicable Appropriate Measures

The following appropriate measures do not apply to this activity

- AM 3.1.4 – household and similar non-household waste is not accepted at the site
- AM 3.2.11 – the material accepted at the site will be non-hazardous, inert waste and therefore the offloading area does not require an impermeable surface with sealed drainage. Suitable material will be placed directly at or close to the location of deposit.

## 2.4 AM 3.1 - Waste Pre-Acceptance

### 2.4.1 AM 3.1.2 – Ad-hoc Waste Acceptance

Although the type of waste to be accepted at the site will be largely similar in composition (typically excavated soils and stones), the source and supplier may vary as a consequence of the ad-hoc nature of construction and demolition projects that generates that type of material. As a result potential suppliers may make short-notice enquiries to the Operator to bring their waste arisings to the facility. Potential suppliers are not permitted to attend site without prior notice or providing suitable information as this will inhibit the Operators ability to make the requisite checks on the proposed waste. The Operator proposes to import and place waste generated from its own development and permitted activities, and therefore the likelihood of uncharacterised material being brough to Site is very low.

### 2.4.2 AM 3.1.3 and AM 3.1.5 – Requisite Information

To counter accidental or deliberate importation of unsuitable, unpermitted waste types at the facility the Operator maintains a strict was acceptance procedures which are applied before any material is brough to site. This includes determining if the waste is non-hazardous as well as inert. The waste enquiry procedure requires the following information, where available and applicable, to be gathered prior to waste acceptance:

- Waste producer details including organisation name, address and contact details;
- Waste European Waste Catalogue Code and description;
- Quantity of waste to be supplied to the site;
- Source and origin of waste (e.g. site investigation reports, borehole logs);
- Information on the waste production process (description including characteristics of raw materials and products);
- Appearance of the waste (e.g. smell, colour, physical form).
- Description of the waste treatment applied, or a statement of reasons why such treatment is not considered necessary; and,
- Chemical analysis data on the composition of the waste.

### 2.4.3 Proposed Waste Types

All relevant information provided by the supplier will be compared against the list of permitted wastes in Table 1 to ensure it can be accepted at the site. The review will also confirm if the coding provided by the supplier is correct.

**Table 1 - Acceptable Waste Types**

| EWC Code | Description |
|---|---|
| 01 01 02 | **Wastes from mineral non-metalliferous excavation**<br>Restricted to waste overburden and interburden only |
| 01 04 08 | **Waste ravel and crushed rocks other than those mentioned in 01 04 07** |
| 01 04 09 | **Waste sand and clays.** |
| 17 01 01 | **Concrete.**<br>Must not include concrete slurry. |
| 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 05 04 | **Soil and stones other than those mentioned in 17 05 03.**<br>Must not contain any contaminated soil or stone from contaminated sites. Must not include top soil or peat. |
| 19 12 09 | **Minerals (for example sand, stones).**<br>Restricted to wastes from treatment of waste aggregates that are otherwise naturally occurring minerals. Does not include fines from treatment of any non- hazardous waste or gypsum from recovered plasterboard. |
| 20 02 02 | **Garden and park wastes (including cemetery waste) – soil and stones.**<br>Must not contain contaminated stones from garden and parks waste. Must not include top soil or peat. |

The approved Waste Recovery Plan (WRP) requires all wastes accepted in accordance with it to be inert. Section 2.1.1 of The Council Decision 2003/33/EC (waste acceptance at landfills) includes a list of wastes in that are assumed to be inert and therefore acceptable as inert waste without testing if:

- they are single stream waste of a single waste type (although different waste types from the list may be accepted together if they are from a single source); and
- there is no suspicion of contamination and they do not contain other material or substances such as metals, asbestos, plastics, chemicals, etc. to an extent which increases the risk associated with the waste sufficiently to justify their classification as non-inert.

If WAC testing is required, the appropriate data will be requested from the waste producer and will be reviewed by a suitably qualified person, using the WAC criteria specified in Section 2.1.2 of the Council Decision 2003/33/EC.

### 2.4.4 AM 3.1.6 to 8 – Waste Classification (including Level 2 Checks)

In the case of suspicion of contamination, either from visual inspection or from the knowledge of the origin of the waste, suitable analytical data will be required to demonstrate that the waste is acceptable in accordance with Agency guidance document WM3[4].

Ground investigation or waste material testing provided by the supplier will be reviewed to ensure it has been carried out by an appropriately accredited laboratory and it is still valid i.e. the testing matches the material proposed to be brought to site. If site staff have reservations about the description of the waste, the number of samples taken or the quality of the testing itself, they may request additional analysis to be carried out by the waste producer before a decision is taken whether to accept it (i.e. Level 2 Checks). Testing of additional samples of the waste may be required and that

[4] Waste Classification: Guidance on the classification and assessment of waste (1st Edition v1.2.GB)

will be sent to a laboratory that meets the Agency's requirements[5] for compliance with Environmental Permitting (England and Wales) Regulations (2016)(as amended).

Assuming the waste is non-hazardous and inert, it must also be assessed to ensure it is physically suitable for acceptance at the site. This will include criteria such as its physical state. If the moisture content of the waste is too high, it may produce free liquid on deposit that could run off and cause water pollution. Excessive moisture could also make it geotechnically unstable leading to platform collapse or instability. Conversely certain waste should not be accepted if in their fully dry state they produce dust emissions. This may be unavoidable in periods of hot, dry weather however if the status of the waste is known the Operator can implement appropriate management controls on receipt. No waste will be accepted that has the potential to generate odours or attract pests in any physical state.

### 2.4.5 AM 3.1.10 to 11 – Records and Review

The Operator maintains records of all waste queries associated with material received at the activity for a minimum period of 3 years. A number of suppliers are long-term clients of the Operator which provides material from a regular source or sources. The Operator is in constant contact with these suppliers to ensure the nature of the material remains consistent. If there are any changes to the waste imported, the process that generates it or if it fails the existing waste acceptance criteria, a review of all relevant information provided by the supplier will be required. This will happen on a minimum annual basis regardless.

## 2.5 AM 3.2 - Waste Acceptance at Site

### 2.5.1 AM 3.2.1 to 4 – Initial Checks

All vehicles delivering waste to the Site will stop at the entrance area (off the public highway) and pause at a primary holding area. Each vehicle load will be subjected to a visual inspection and documentation check by the Site Operation staff before gaining approval to proceed to the active deposit/ recovery operation. This is the first checkpoint to verify that the material proposed by the supplier meets the information provided in the pre-acceptance checks. This will include where practicable reference to the qualitative acceptance parameters described in Section 2.4 which are informed by the type of waste the Operator requires to construct the DfR platform. Prior to arranging delivery of the waste, Site operatives will be consulted to ensure there is sufficient space and operational capacity to accommodate and place the material.

### 2.5.2 AM 3.1.12 – On-Site Acceptance Parameters

The Operators ability to set qualitative waste acceptance parameters is determined by individuals physical access to the waste brought to site. In most cases it is not practicably possible for the Site Operatives to make a visual assessment of the suitability of waste when it is still in the delivery vehicle. The most suitable place to carry that out is at point of deposit where the full profile of waste can be viewed. As this material will come from the DfR Permit holder, they are also able to make an assessment at the source of the material as follows:

[5] Using MCERTS for the chemical testing of soil - GOV.UK (www.gov.uk)

- **Odour** – strong odours may be noticeable from the material prior to excavation at the source site or deposited at the DfR activity. Odours of concern may include hydrocarbons, burning (smoke), organic odours indicating biodegradable materials or hydrogen sulphide (rotten eggs) from waste degrading in anaerobic conditions.
- **Visible plumes** – Burning waste may be emitting smoke which could be visible to the HGV driver at the source site or on deposit. Plumes of dust may indicate very dry, dusty material unsuitable for deposit.
- **Litter** – the material for deposit will not normally require full enclosure if it consists of granular or cohesive excavation type waste. If fugitive litter or other materials is seen around the source of material at the site of origin or when deposited, it could indicate it contains unsuitable material for deposit at the Site and should not be accepted.
- **Visual appearance of the waste** –although a range of excavation and demolition wastes are suitable for deposit at the site, if the material being loaded into the HGV appears different to the pre-acceptance description it be an indication that it contains other unsuitable materials. For example it is the Operators expectation that a source will consist primarily of granular material and a load that appears to be predominantly soils, then it suggests an issue with the pre-acceptance information.
- **Visual presence of contaminants** – visible contaminants at the source site could include hydrocarbon staining, free liquids, organic materials, litter, unsuitable construction and demolition materials such as plasterboard, asbestos or wood fragments.

If there is a concern with the visible appearance of any material at the source site identified by the HGV driver or the Operators representative on Site, then it should not be permitted for import to the DfR Site.

### 2.5.3 AM 3.2.5 to 10 – Documentation

The documentation accompanying the load will be checked and will include, but not be limited to, the Carriers Certificate of Registration details and Duty of Care Waste Transfer Note. The information to be recorded in respect of each load will be:

i. Waste Type & EWC Code;
ii. Date;
iii. Time;
iv. Customer Name;
v. Vehicle Registration Number and Type;
vi. Ticket Number or WAF Code; and,
vii. Carriers Certificate of Registration.

The DfR Site Operative will confirm that the accompanying documentation (i.e. waste description or likely levels of contamination) demonstrates that the waste load is the same waste type described by the customer at the pre-acceptance stage. A WAF code will be allocated to each load in advance and a copy of that WAF code recorded in the Site Acceptance Workbook. If the Site Acceptance Workbook does not contain the corresponding WAF number they must seek advice from the TCM. No vehicle shall proceed for deposit without a valid WAF number.

For wastes produced by the operator at a different site this visual verification may be made at the point of dispatch. In such cases this verification must be documented and the document be made available

at the receiving site. All information including the weight of the load measured by the weighbridge will be stored in paper form or electronically.

If the documentation is not correct and the correct paperwork cannot be provided, the Site Operative will inform the Technically Competent Manager (TCM) and the load will be rejected. In those circumstances the persons fulfilling the role of waste carrier and the waste supplier within the Operators company or externally, will be contacted to attempt to resolve the situation before the vehicle leaves site or more importantly, more of the same waste is brought to site. The operatives at the deposition area will also undertake a visual inspection of each waste load arriving to site. Should any load look suspicious or unsuitable for deposition, the operative at the operational area will contact the TCM to assess the waste load in question.

A record will be made if the load is rejected or is accepted for deposit at the site. If a load is deposited, found to be unsuitable and the delivery vehicle is not immediately available to remove it, the load will be placed in the quarantine area located on concrete hardstanding in the base of the quarry. Arrangement will be made to remove the material and until the issue is resolved, no more waste will be accepted from them at the site. It will not be possible to determine visually if the rejected waste is hazardous, however if as a result of testing the waste retained on site is found to have hazardous levels of relevant substances, it will be managed as a hazardous waste in accordance with Agency guidance on rejected loads.[6]

The persons carrying out the pre-acceptance and acceptance checks will be suitably qualified to review pre-acceptance information, compare it against relevant thresholds to determine if it is hazardous or non hazardous, and thresholds or descriptions to determine if it is inert waste. Similarly the individuals supervising deposit of the material will be trained in the application of the relevant waste acceptance and rejection procedures.

## 2.6 AM 3.3 – Quarantine

### 2.6.1 AM 3.3.1 to 5 – Quarantine Measures

Any waste that is found to be unsuitable for deposit in the DfR activity will be placed in the quarantine area prior to its removal from site by the Operator. The area will accommodate up to 20 tonnes of excavation waste material. The risk of contaminated run-off from the type of waste to be accepted at the site is considered to be low, however if appropriate quarantined material may be sheeted if there is a risk of pollutant mobilisation from rainfall or wind. In the unlikely event it is infested or odorous it will be removed from site within 24 hours. The event will be recorded and the Environment Agency will be notified as soon as possible of any rejection of part or all of a waste delivery. A record will be kept of the following:

i. Date and time;
ii. Person rejecting waste;
iii. Haulier /customer name and address including carrier number;
iv. Vehicle registration number;
v. Producer name and address if known;
vi. EWC number;
vii. Transfer note number; and
viii. Waste description.

[6] Hazardous waste: rejected loads guidance - GOV.UK (www.gov.uk)

# 3 Waste Storage Plan

## 3.1 Appropriate Measures

This section addresses Appropriate Measure (AM) 4.0 which concerns the storage of waste at the site prior to treatment and any relevant waste outputs from the process, specifically AM 4.0.1 which states:

*You must have waste storage and handling procedures. You must store and handle waste in a way that makes sure you prevent and minimise pollution risks by using appropriate measures.*

No waste accepted at the site will be subject to further treatment nor will any residues be generated as a result. It may be necessary to temporarily stockpile small quantities of different types of waste subject to its use in the construction of the development platform, primarily the allocation of granular material for use in the on-site haul roads.

## 3.2 Non-Applicable Appropriate Measures

The following appropriate measures do not apply to this activity

- AM 4.0.8 – waste to be stored and treated on site is inert
- AM 4.0.9 / 4.0.10 – No Refuse Derived Fuel or Solid Recovered Fuel stored or produced at site
- AM 4.0.11 – waste will not degrade to produce odour or attract vermin
- AM 4.0.12 – waste not stored in containers
- AM 4.1.2 – only excavated soil and stones is accepted at the site

## 3.3 General Principles

### 3.3.1 Current and Proposed Permitted Activities

Table S1.2 of the permit will include R13: *Storage of wastes pending the operations numbered R3 to R5*. It is likely imported material will be placed directly in the DfR landform. It may be necessary to retain small stockpiles of material to construct a granular hard standing for HGV movements once the concrete hardstanding has been buried.

### 3.3.2 AM 4.0.2 – Waste Locations

AM 4.0.7 states that waste must be stored to prevent unnecessary handling, this is to reduce the risk or occurrence of emissions such as noise from plant / material handling, dust or odour from disturbed wastes. Odour is not an issue at this site as the waste is not biodegradable or contains odorous chemicals. There will be no visible plumes associated with the activity e.g. from a discrete emission point associated with waste treatment. The impact of dust and noise are considered in the accompanying Environmental Risk Assessment.

### 3.3.3 AM 4.0.5 / 4.0.6 – Waste Storage Arrangements

Temporary storage of waste may be necessary where the on-site plant is not immediately available to place it or a particular type of material is required for a specific purpose e.g. a granular running

surface for the haul roads. All such materials will be deposited in discrete stockpiles in the base of the quarry as close to the active area of deposit as possible, without obstructing current activities. This will minimise the transport distance covered by the site plant. A record will be kept of the source and type of material in each stockpile and when it was deposited. This will enable the Operator to identify the material and place it accordingly.

### 3.3.4 AM 4.0.3 – Waste Handling

Wastes stored prior to final placement will be deposited the immediate vicinity (where practicable) to their intended use where they can be easily transferred using a tracked 360 excavator. All plant drivers have the appropriate qualifications and experience to operate the machinery they are allocated. They are also proficient in routine maintenance of that plant (where practicable on site) and responsible for ensuring defects are reported to the TCM in a timely manner so they can be addressed as part of the servicing plan or as required.

### 3.3.5 AM 4.0.7 – Waste Retention

AM 4.0.7 states that waste must not be accumulated on site. This is to avoid the potentially significant management issues that can be associated with large accumulations of combustible or biodegradable wastes susceptible to the risk of fire and / or environmentally harmful degradation products (e.g. run-off, odour, pests). Accumulations of non-degradable wastes can be problematic in terms of space, production of dust (when drying out), unsightly stockpile heights and uncontrolled run-off.

The Operator will run their site as a waste recovery activity in accordance with the Article 3 definition in the Waste Framework Directive[7]. They also operate in compliance with Article 2 (g) of the Landfill Directive[8] which states waste stored on site for less than 3 years is not considered to be a landfilling activity. There will be a limit on the quantity of waste imported to the Site, and that will include granular material stored temporarily pending placement as part of an HGV running surface. Material will not be stored on site pending use or placement on another Site. No waste will be accepted or stored on site that is combustible, biodegradable or has the potential to release environmentally harmful emissions.

### 3.3.6 Fire Prevention Considerations

The type of waste imported for processing at the site and the waste / non-waste material outputs from it consist exclusively of soil, stones and aggregates. These materials are not flammable and therefore imposition of firebreaks in accordance with Section 11.1 of Agency guidance on *Fire Prevention Plans: Environmental Permits*[9] does not apply.

[7] Directive 2008/98/EC of the European Parliament and of the Council of 19 November 2008 on waste and repealing certain Directives (Text with EEA relevance) (legislation.gov.uk)
[8] Council Directive 1999/31/EC of 26 April 1999 on the landfill of waste (legislation.gov.uk)
[9] Fire prevention plans: environmental permits - GOV.UK (www.gov.uk)

## 3.4 Operating Technique – Waste Containment

### 3.4.1 AM 4.0.4 – Waste Storage Pollution Prevention

The entirety of the land within the proposed permit boundary is not located within a Source Protection Zone (SPZ) 1 or 2. Waste stored pending permanent deposit are not stored within 10 m of a watercourse or any borehole used for the supply of potable water or other purposes. A geological SSSI is located within 500 m of the Site but it is not sensitive to emissions from the activity nor is there a direct hydraulic link to it.

The types of waste accepted for treatment at the site is included in the list of wastes detailed in Table 2.3 of SR2010No.39 and would be suitable for storage on a hard-standing in accordance with the limitations of other stand rules permits. Temporary placement of this material on the concrete hardstanding or other inert waste deposits is considered to be the appropriate containment measure for this site.

### 3.4.2 AM 4.0.13 – Waste Storage Inspection

AP 4.13 requires all waste storage locations to be inspected regularly to ensure there is no loss of containment or spillages of waste. All wastes stored pending treatment do not require additional containment measures, however they will be regularly inspected to check:

- The stockpile size is not excessive in size.
- The correct material is being stored in that stockpile.
- Under dry and windy weather conditions the material is not generating windblown dust. If observed to be the case damping down measures will be employed.
- Under very wet conditions surface water that run-off is not occurring and mobilising solids.

### 3.4.3 AM 4.1.1 – Waste Segregation

AM 4.1.1 requires wastes to be segregated where if cross-contamination was to occur, this would render one or more of the waste unsuitable for recovery thereafter. None of the wastes imported to site for deposit in the DfR have the potential to cause contamination of others in that manner and additional segregation measures are not required.