

Environment Agency permitting decisions

Variation

We have decided to issue the variation for Greenwich Integrated Waste Management Facility operated by Veolia ES Cleanaway (UK) Ltd.

The permit number is EPR/DP3390EL.

The variation number is EPR/DP3390EL/V003.

We consider in reaching that decision we have taken into account all relevant considerations and legal requirements and that the permit will ensure that the appropriate level of environmental protection is provided.

Purpose of this document

This decision document:

- explains how the application has been determined
- provides a record of the decision-making process
- shows how all relevant factors have been taken into account
- justifies the specific conditions in the permit other than those in our generic permit template.

Unless the decision document specifies otherwise we have accepted the applicant's proposals.

Structure of this document

- Description of main the changes introduced by the variation
- Key issues
- Annex 1 the decision checklist
- Annex 2 the consultation, web publicising and newspaper advertising responses

Description of the changes introduced by the Variation

This application varies the existing permit EAWML/83498 which includes an materials recycling facility (MRF), waste transfer station and household waste recycling centre (HWRC) to change the existing MRF activities into an refuse derived fuel (RDF) facility. The RDF facility will be an a schedule 1 installation activity for 'physical treatment of waste for disposal over 50 tonnes per day'.

Site Description

Greenwich Integrated Waste Management Facility is located at grid reference TQ6230 9610. The site is located approximately 1km west of Thamesmead and 1 km north of Abbey Wood. The site is surrounded by industrial / commercial uses being part of an established industrial area.

The site is currently operated as a waste transfer station, HWRC and MRF and this variation does not seek to change any of the operations except the MRF.

The design waste throughput capacity of the new RDF facility will be a maximum of 26 tonnes per hour. The facility is therefore expected to process up to 60,000 tonnes per annum.

The quantities of waste received at the site will remain below the maximum tonnage of 411,000 tonnes per year current permitted.

RDF Process

Visibly recyclable material such as wood and card will be manually removed from the input material and metals will also be removed using an over-band magnet post shredding of the waste.

The shredded waste will be compacted into bales and wrapped ready for storage and loading onto bulk vehicles for onward export to energy from waste plants. The RDF Facility will accept household, commercial and industrial wastes.

Delivery

The incoming loads of commercial waste will be weighed in at the weighbridge and the incoming waste will be delivered, tipped and stored in the input bay located within the RDF building.

The input bay is capable of storing up to 500m³ of waste at any one time, and waste will be processed on a prioritised basis. No waste will remain in the input bay longer than 3 days in order to minimise the potential for odour generation. In practice, the waste is expected to spend less than 24 hours in the storage area prior to processing.

Processing

A visual inspection of the input loads will be carried out with manual removal of non-suitable material. The waste will then be fed into the inlet hopper of the conveyor system by loading shovel or similar. This will be done at a rate in order to match the shredding machine nominal capacity. The waste will be shredded and the shredded material will pass under an over band magnet to remove any metals. The shredded material will pass into the baling machine which will compress the RDF into a shape ready for wrapping. The baled RDF will then be mechanically wrapped with heavy duty plastic film using a cross wrap system. As a result the RDF bales will be wrapped in several layers of plastic films to ensure no water ingress or escape of waste material.

Storage and Loading

Once the bales have been wrapped, they will be removed from the process equipment by forklift and stored within the building within a dedicated area as

detailed within the site plan. The bales will be stored here whilst awaiting loading onto bulk vehicles.

Bales will be stored in a clearly delineated storage area indicated on the site plan. Bales will be loaded onto curtain sided bulk vehicles using a forklift that will have modified forks to enable the handling of bales without ripping the wrapping. They will also be fitted with rubber strips to prevent sparks when picking up bales. The bales will be loaded on a first in first out basis to ensure no bales remain on site for a prolonged period of time. It is envisaged that the usual storage time for any single bale will be no more than 3 working days. The maximum retention time for bales will be 1 month (based on a worst case scenario where destination plant has a major shutdown and dockside storage capacity has been reached).

Mixed paper and card, glass and dry mixed recyclates will continue to be stored in the covered bays as presently. A fire retardant wall will separate the bays from the RDF facility building.

Key issues of the decision

Fire Prevention Plan (FPP)

Whilst the burning of waste is not permitted under this permit; Refuse Derived Fuel (RDF) and some of the other waste stored on site are of a combustible nature and pose a fire risk. Therefore the operator has submitted an FPP in accordance with our guidance.

We have reviewed the FPP and approve it subject to the additional requirements concerning the transfer station building. There is an existing suppression system within the transfer station building and we have assessed the system in line with '*Fire prevention plans: environmental permits' guidance*' dated July 2016. The existing suppression system does not meet our requirements. The operator has stated that the suppression system in the transfer station building shall be upgraded to meet our current guidance. As this part of the site is already operational and not directly impacted by this variation we are satisfied that this upgrade can be completed under the improvement conditions listed below in table 1.

Table 1 - Improvement condition requirements

Reference	Requirement	Date
IC1	The Operator shall submit a report confirming the finalised specifications of the proposed improvements to the current suppression system for the waste transfer station in order to meet the standards within Section 14 of ' <i>Fire prevention plans: environmental permits' guidance</i> .	22/10/2016

	The report shall be submitted in writing to the Environment Agency for approval prior to installation of improvements to the suppression system.	
IC2	Once approved in writing by the Environment Agency, the improvements to the suppression system specified in accordance with improvement condition IC1 above shall be installed and commissioned. On completion of the improvement works, the operator shall submit a commissioning plan to the Environment Agency that includes, but need not be limited to, confirmation that the improvements have been completed.	22/03/2017
IC3	Following commissioning of the improved suppression system in the transfer station building the site's Fire Prevention Plan shall be updated accordingly and submitted to the Environment Agency for approval. The FPP shall reflect any changes resulting from the installation of the improved suppression system. Once approved, the revised FPP will form part of the Operating Techniques referenced in Table 1.2 and supersede the plan (dated July 2016) currently referenced in the permit.	Within 1 month of completion of IC2 above

Waste Codes

The operator has requested the addition of the following waste codes:

- 20 03 07 bulky waste,
- 20 01 08 biodegradable kitchen and canteen waste; and
- 20 01 99 municipal offensive waste.

20 01 99 has been defined in the permit as 'only wastes comprising of non-clinical human and animal offensive/hygiene waste which is not subject to special requirements in order to prevent infection (not arising from healthcare and/or related research i.e. not including waste from natal care, diagnosis, treatment or prevention of disease).'

Storage

The operator has stated that best available techniques (BAT) for RDF storage Sector Guidance Note 5.06 (specifically waste storage within section 2.1.3) will be adhered to in the following ways:

All wastes will be unloaded within the building on impervious surface with contained drainage. A weighbridge waste acceptance procedure will be in place and all loads will be unloaded with site supervision and a site acceptance procedure.

A weighbridge procedure automatic transfer note printing and quarterly waste returns to the Environment Agency will be carried out.

General Storage –

- The bale storage area will cause no visual impact as site is within an industrial park. Minimal storage time on site.
- The bale storage area is clearly marked on the site plan and shows the maximum amount that will be stored at any one time.
- All bales will be wrapped in several layers of weatherproof plastic film to ensure all material is contained and no leakage or water ingress can occur. Bales will be inspected for holes, loose wrapping prior to leaving the building.
- All bales and stacks will be inspected for integrity on a daily basis. Any bales found not to conform will be returned to the building and reprocessed immediately.

Bales will be removed from the site on a first in first out basis. The maximum time bales will remain on site is 1 month (this is contingency for onward plant shutdown). Average retention time on site will be 3 working days maximum.

Drainage

The existing drainage is sufficient to facilitate the change to the MRF building and a drainage plan is included as part of this application. The existing site drainage comprises a sealed system, with surface water run-off from the external yard area draining to foul sewer, via an interceptor. Only clean surface water run-off from the building roofs is discharged to surface water sewer.

Emissions to Air, Water and Land

There will be no point source emissions to air from the new facility. The unloading, treatment and baling of waste will all take place within the proposed RDF building. The building will also be fitted with an odour suppressant 'mist' system which will further reduce odour and dust release.

The waste will be processed rapidly and on a first in first out basis. All bales will be wrapped in several layers of plastic films before being stored outside which will further prevent emission to air and will normally remain on site for a maximum of 3 days. No potentially contaminated water from the new facility will be released to surface water. Surface water from the yards/roads will continue to be discharged to the exiting surface water drainage system. The unloading, treatment and baling of waste will all take place within the RDF building which has engineered impermeable concrete floor. All bales will be wrapped plastic films and fully waterproof and leak proof. Daily inspections of the bales will take place to ensure all are fully intact. Any bale found to be damaged will be returned to the RDF building without delay for reprocessing. Domestic sewage will also be discharged to the Thames Water sewer. There will be no point source emissions to land from the new facility as waste input, treatment and baling will all be contained within the RDF building.

Odour Management

The H1 environmental risk assessment has been carried out and indicates that the likelihood of odour from the new facility causing a risk to the environment to be low. However there have been some odour complaints attributed to the site in the last 12 months and as the site does not have an odour management plan we have requested, through an improvement condition that the operator submit an odour management plan within 3 months of issue of this variation. An improvement condition has been included in table S1.3 of the permit as detailed below in table 2.

Table 2 - Improvement condition requirements

Reference	Requirement	Date
IC4	The Operator shall submit a written odour management plan to the Environment Agency for approval. The odour management plan shall be developed in line with Technical Guidance Note H4 'Odour management' and include a proposed timetable for completion of any improvement works. The Operator shall implement any necessary improvements to a timetable agreed in writing with the Environment Agency.	22/12/2016

Noise Management

The H1 assessment demonstrates the likelihood of noise from the new facility to be low. The plant/machinery will be located within the proposed building, which will significantly attenuate noise generated by the facility. Openings into the building will generally be facing away from the direction of the closest residents. It is to be noted that the existing site has not previously received noise complaints. In future, if noise at the site had the potential to become an issue then a noise management plan would be produced and agreed with the local Environment Agency.

Household Waste Recycling Centre Maximum Tonnage Limit

A maximum tonnage has been specified in Table S2.4 for the total quantity of waste accepted at the Household Waste Recycling Centre. This maximum tonnage limit is specified as 13,000 tonnes per annum.

Annex 1: decision checklist

This document should be read in conjunction with the application, supporting information and permit/notice.

Aspect considered	Justification / Detail	Criteria met
Receipt of submission		
Confidential information	A claim for commercial or industrial confidentiality has not been made.	✓
Identifying confidential information	We have not identified information provided as part of the application that we consider to be confidential. The decision was taken in accordance with our guidance on commercial confidentiality.	✓
Consultation		
Scope of consultation	<p>The consultation requirements were identified and implemented. The decision was taken in accordance with our Public Participation Statement and our Working Together Agreements.</p> <p>For this application we consulted the following bodies:</p> <ul style="list-style-type: none"> • Royal Borough of Greenwich Environmental Health • Public Health England • London Fire Brigade • Health and Safety Executive 	✓
Responses to consultation, web publicising and newspaper advertising	<p>The consultation response received from Public Health England is detailed in Annex 2 and were taken into account in the decision.</p> <p>The decision was taken in accordance with our guidance.</p>	✓
European Directives		
Applicable directives	All applicable European directives have been considered in the determination of the application.	✓
The site		
Extent of the site of the facility	<p>The operator has provided a plan which we consider is satisfactory, showing the extent of the site of the facility</p> <p>A plan is included in the permit and the operator is required to carry on the permitted activities within the site boundary.</p>	✓

Aspect considered	Justification / Detail	Criteria met
		Yes
Site condition report	<p>The operator has provided a description of the condition of the site.</p> <p>We consider this description is satisfactory. The decision was taken in accordance with our guidance on site condition reports and baseline reporting under IED–guidance and templates (H5).</p>	✓
Biodiversity, Heritage, Landscape and Nature Conservation	<p>The application is within the relevant distance criteria of a site of heritage, landscape or nature conservation, and/or protected species or habitat.</p> <p>The site boundary is within 1.54 km of Lesnes Abbey Woods Local Nature Reserve (LNR) and 1.85km of Abbey Wood SSSI.</p> <p>We consider that the application will not affect the features of the designated sites. The permit application varies the existing permit which includes an MRF, transfer station and household waste recycling site to change the existing MRF activities into an RDF facility. The unloading, treatment and baling of waste will take place in the RDF building which has an impermeable concrete floor. There are no point source emissions to air or land from the new facility. Surface water from the yards/roads will continue to be discharged to the exiting surface water drainage system.</p> <p>We have not formally consulted on the application. An Appendix 4 form has been completed for information and saved on EDRM. The decision was taken in accordance with our guidance.</p>	✓
Environmental Risk Assessment and operating techniques		
Environmental risk	<p>We have reviewed the operator's assessment of the environmental risk from the facility.</p> <p>The operator's risk assessment is satisfactory.</p>	✓
Operating techniques	<p>We have reviewed the techniques used by the operator and compared these with the relevant guidance notes.</p> <p>The proposed techniques for priorities for control are in line with the benchmark levels contained in the TGN and</p>	✓

Aspect considered	Justification / Detail	Criteria met
		Yes
	we consider them to represent appropriate techniques for the facility. The permit conditions ensure compliance with relevant BREFs and BAT Conclusions,	
The permit conditions		
Updating permit conditions during consolidation	<p>We have updated previous permit conditions to those in the new generic permit template as part of permit consolidation.</p> <p>The operator has agreed that the new conditions are acceptable.</p>	✓
Raw materials	We have specified limits and controls on the use of raw materials and fuels.	✓
Waste types	<p>We have specified the permitted waste types, descriptions and quantities, which can be accepted at the regulated facility.</p> <p>See key issues section for additional information on waste types. We are satisfied that the operator can accept these wastes.</p>	✓
Improvement conditions	<p>Based on the information on the application, we consider that we need to impose improvement conditions.</p> <p>We have imposed improvement conditions to ensure that:</p> <ul style="list-style-type: none"> - the appropriate measures are in place to prevent pollution from odour; and - the appropriate measures are in place to prevent fires on site. <p>See key issues section for further information.</p>	✓
Incorporating the application	<p>We have specified that the applicant must operate the permit in accordance with descriptions in the application, including all additional information received as part of the determination process.</p> <p>These descriptions are specified in the Operating Techniques table in the permit.</p>	✓
Emission limits	No emission limits have been added, amended or deleted as a result of this variation.	✓

Aspect considered	Justification / Detail	Criteria met
		Yes
Monitoring	Monitoring has not changed as a result of this variation	✓
Operator Competence		
Environment management system	There is no known reason to consider that the operator will not have the management systems to enable it to comply with the permit conditions. The decision was taken in accordance with our guidance on Operator Competence.	✓
Technical competence	Technical competency is required for activities permitted. The operator is a member of an agreed scheme.	✓
Relevant convictions	The Case Management System and National Enforcement Database has/have been checked to ensure that all relevant convictions have been declared. No relevant convictions were found.	✓

Annex 2: Consultation, web publicising and newspaper advertising responses

Summary of responses to consultation, web publication and newspaper advertising and the way in which we have taken these into account in the determination process.

Response received on 24 th June 2016 from
Public Health England (PHE)
Brief summary of issues raised
<p>PHE have no significant concerns regarding risk to health of the local population from this proposed activity, providing that the applicant takes all appropriate measures to prevent or control pollution, in accordance with the relevant sector technical guidance or industry best practice.</p> <p>The PHE have recommended that any permit issued for the site should contain conditions to ensure that the following potential emissions do not impact upon public health:</p> <ul style="list-style-type: none"> • fugitive dust / particulate matter emissions from activities on site; and • odours arising from storage, handling, processing and transportation activities. <p>PHE also recommend that the Environment Agency consult the following relevant organisation(s) in relation to their areas of expertise:</p> <ul style="list-style-type: none"> • the local authority; and • the Director of Public Health
Summary of actions taken or show how this has been covered
<p>Dust - The standard condition for emissions of substances not controlled by emission limits is included in the permit. The condition states that emissions of substances not controlled by emission limits (excluding odour) shall not cause pollution.</p> <p>Odour - The standard odour condition is included within the permit. This condition states that emissions from the activities shall be free from odour at levels likely to cause pollution outside the site, as perceived by an authorised officer of the Environment Agency.</p> <p>We have consulted the local authority and the Director of Public Health and have not received any comments back from them.</p>

Response received from
London Fire Brigade
Brief summary of issues raised
No response received
Summary of actions taken or show how this has been covered
No action required

Response received from
Health and Safety Executive

Brief summary of issues raised
No response received
Summary of actions taken or show how this has been covered
No action required

Response received from
London Borough of Greenwich Environmental Health
Brief summary of issues raised
No response received
Summary of actions taken or show how this has been covered
No action required

The application was advertised on our website between 23/05/2016 to 21/06/2016.
 No comments were received.