Environment Agency permitting decisions

Variation and consolidation

We have decided to issue the variation for Brent Transfer Station operated by Veolia ES (UK) Ltd

The variation number is EPR/YP3491NZ/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.

Description of the changes introduced by the Variation

Existing permit EAWML/80379 has been varied to add a new schedule 1 installation activity 'physical treatment of waste for disposal over 50 tonnes per day' to the existing waste transfer station activities in order to produce Refuse Derived Fuel (RDF).

Site Description

Brent Transfer Station is situated 3km South West of Wembley Stadium at grid reference TQ 178829. 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 and is permitted to accept up to 1,000 tonnes per day of non-hazardous and hazardous wastes.

The design waste throughput capacity of the new RDF facility will be 20 tonnes per hour. The facility is therefore expected to process up to 55,000 tonnes per annum when operating during normal hours.

The quantities of waste received at the site will remain below the maximum tonnage of 1,000 tonnes per day or 365,000 tonnes per year currently permitted.

RDF Process

Metals will be removed from the waste stream using an over-band magnet post shredding. The shredded waste will be compacted into bales and wrapped ready for storage and loading onto bulk vehicles for onward export to energy plants. The RDF Facility will accept municipal black bag and commercial wastes.

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Delivery

The incoming loads of commercial waste will be weighed in at the weighbridge situated in the new proposed operational area as shown on the plan in Appendix A. The incoming waste will be delivered, tipped and stored in the corresponding input bay located to the north of the RDF building.

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 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 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 outside (not within the building) within a dedicated area. The bales will be stored here whilst awaiting loading onto bulk vehicles.

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).

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

- Key issues
- Annex 1 the decision checklist
- Annex 2 the consultation, web publicising and newspaper advertising responses

Key issues of the decision

Change of name

The name of the permit holder has also been updated from ONYX U.K. LIMITED to Veolia ES (UK) Ltd.

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 Applicant has submitted a FPP in accordance with our guidance.

We, the Environment Agency, have reviewed the FPP and consider it complies with the requirements of our guidance. Having considered the Applicant's FPP we are satisfied that appropriate measures will be in place to prevent waste fires and if a fire did occur the impact on people and the environment will be reduced.

It has been agreed that the Fire Suppression System for the waste transfer station will be installed within 4 months of permit issue. During this period, additional measures will be put in place to further reduce any potential fire risk. This has been agreed in writing with the Environment Agency.

Waste Codes

The existing Waste Transfer Station currently takes non-hazardous and some hazardous wastes (including 13 02 05*, 13 02 06*, 16 06 01*, 16 06 02*,16 06 06*, 16 06 03*, 20 01 23* and 20 01 35*).

The RDF facility will process only non-hazardous waste.

During determination it was requested by the operator that additional waste codes were added to Waste Transfer Station waste code table. These included a number of hazardous waste codes.

The hazardous waste codes required additional supporting information to establish the risk associated with them and suitable control measures. The additional waste codes have therefore not been added through this variation.

Storage

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

RDF Facility

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.

Weighbridge procedure, automatic transfer note printing and quarterly waste returns to the EA.

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.

Waste Transfer Station

Hazardous waste storage

WEEE (Fridge, LDA) and WEEE (TV) are contained in separate Roll-on, Roll-off (RO-RO) containers, oxygen and other cylinders are kept in standalone cages, used engine oil is kept in a 5000 litre double bunded glass-reinforced plastic (GRP) tank and batteries in 4 battery boxes.

Site Condition Report

It is understood that this area of the site will remain unchanged. The site is completely covered with concrete hardstanding which appeared to be in good condition.

Two ground investigations were conducted on the Alperton Depot which included the current development site. A summary of the sequence of geology encountered in the area of the proposed RDF is provided within the site condition report.

The superficial deposits underlying the site (Alluvium and Taplow Gravel) are classified as Secondary-A Aquifers. Based on the results of groundwater monitoring onsite during the 1993 GI by Wimpey, groundwater is estimated to be at 3.7m depth and within the Alluvium. The degree of hydraulic continuity between groundwater and the River Brent is likely to be low given the river is channelled. However, weep holes present in the side walls and base of the channel, typically installed to prevent uplift damage from underlying or adjacent groundwater pressures could result in a pathway by which the groundwater and surface water may be hydraulically connected.

Previous site investigations were carried before MCerts and UKAS methods for testing petrol/diesel/mineral oils were established. As site has had previous historical use, it could be beneficial to test for contaminants of concern now being introduced on site as part of site activities and not previously tested for in order to establish a baseline. We have included the a standard condition specifying that periodic monitoring for groundwater and soil should be carried out, unless such monitoring is based on a systematic appraisal of the risk of contamination.

Drainage

Surface water from the yards/roads will continue to be discharged to the exiting surface water drainage system and so will the water runoff from the roof of the new building. The unloading, treatment and baling of waste will all take place within the proposed RDF building which will have an engineered impermeable concrete floor. The outside storage of wrapped bales will also take place on fully impermeable hardstanding. Wash down water from the building as well as surface water from the bale storage area will be discharged to the public sewer in agreement with the trade effluent discharge consent with Thames Water. All bales will be wrapped in several layers of heavy duty 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.

The existing drainage will be amended to accommodate the new building.

The site will have a comprehensive drainage system incorporating gullies, drains and interceptors.

Any liquids that may be generated in the transfer station hall or loading bay is disposed of to foul sewer via an interceptor. Drainage from the facilities in the weighbridge area is disposed of directly to sewer.

Drainage from hard surfaced areas of the site is disposed of to surface water via an interceptor. Rainwater is collected by the roof guttering system and discharged directly to surface water.

The surface water interceptor will be inspected regularly or after any spillage on site and will be emptied at regular intervals to prevent pollution of underground strata and surface waters. The current minimum schedule for emptying is every 8 weeks, however additional spot cleanses will occur if the situation changes.

Odour Management

The H1 assessment demonstrates that the likelihood of odour from the new facility causing a risk to the environment is low. The rapid processing and turnaround of wastes combined with the building containment and the fitting of a rotary odour suppressant spray system further mitigate these findings. To date the site hasn't received any complaints regarding odour with sensitive receptors being residential properties located approximately 170 m to the south of the site and approximately 300 m to the north-west of the site across Alperton Lane. In future, if odour at the site was to be perceived an issue then an odour management plan would be produced and agreed with the local Environment Agency.

Noise Management

The H1 assessment indicates that the likelihood of noise from the new facility to be low. The plant/machinery will be located within the proposed Building. Potential noise should also be reduced by the existing screening provided by the elevated sections of the railway lines and the likely ambient noise generated by the busy A40. These measures will reduce the impact of noise on the closest sensitive receptors located approximately 170 metres to the south of the site beyond the railway and A40. It is to be noted that the existing site has not previously received noise complaints. In future, if noise at the site was to be perceived an issue then a noise management plan would be produced and agreed with the local Environment Agency.

Annex 1: decision checklist
This document should be read in conjunction with the Duly Making checklist, the application and supporting information and permit/ notice.

Aspect considered	Justification / Detail	Criteria met Yes
Consultation		
Scope of consultation	The consultation requirements were identified and implemented. The decision was taken in accordance with our Public Participation Statement and our Working Together Agreements.	✓
Responses to consultation, web publicising and newspaper advertising	The web publicising, consultation and newspaper advertising responses (Annex 2) were taken into account in the decision. The decision was taken in accordance with our guidance.	✓
Operator		
Control of the facility	We are satisfied that the applicant (now the operator) is the person who will have control over the operation of the facility after the grant of the permit. The decision was taken in accordance with EPR RGN 1 Understanding the meaning of operator.	✓
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	The operator has provided a plan which we consider is satisfactory, showing the extent of the site of the facility A plan is included in the permit and the operator is required to carry on the permitted activities within the site boundary. See key issues section for further information.	✓
Site condition report	The operator has provided a description of the condition of the site. 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).	✓
Biodiversity, Heritage, Landscape and Nature	The application is not within the relevant distance criteria of a site of heritage, landscape or nature conservation, and/or protected species or habitat .	✓

Aspect considered	Justification / Detail	Criteria met Yes
Conservation		
Environmental Risk Assessment and operating techniques		
Environmental risk	We have reviewed the operator's assessment of the environmental risk from the facility. The operator's risk assessment is satisfactory.	✓
Operating techniques	We have reviewed the techniques used by the operator and compared these with the relevant guidance notes. The proposed techniques for priorities for control are in line with the benchmark levels contained in the TGN and 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.	We have updated previous permit conditions to those in the new generic permit template as part of permit consolidation. The operator has agreed that the new conditions are acceptable.	✓
Raw materials	We have specified limits and controls on the use of raw materials and fuels.	✓
Waste types	We have specified the permitted waste types, descriptions and quantities, which can be accepted at the regulated facility. See key issues section for additional information on waste types. We are satisfied that the operator can accept the wastes listed in the permit.	✓
Improvement condition	Based on the information in the application, we consider that we need to impose an improvement condition. We have specified that the operator must install a suppression system within the waste transfer building within 4 months of variation EPR/YP3491NZ/V003 to ensure that fire risk is minimised.	✓
Pre-operational conditions	Based on the information in the application, we consider that we need to impose a pre-operational condition. We have specified that prior to the operation of the RDF plant that a suppression system must be installed within the RDF building to ensure that fire risk is minimised.	✓

Aspect considered	Justification / Detail	Criteria met
		Yes
Incorporating the application	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. These descriptions are specified in the Operating Techniques table in the permit.	✓
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.	✓

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

Response received on 29/02/2016 from
Public Health England (PHE)
Brief summary of issues raised
PHE has 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.
Summary of actions taken or show how this has been covered
No action required

Response received from
Director of Public Health
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
Local authority environmental protection department
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 27/08/2015 to 13/11/2015.
No comments were received.