

Permitting decisions

Bespoke permit

We have decided to grant the permit for A1 Hazardous Waste Transfer Station operated by A1 Services (Manchester) Limited.

The permit number is EPR/ZP3400BE.

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 provides a record of the decision making process. It:

- highlights [key issues](#) in the determination
- summarises the decision making process in the [decision checklist](#) to show how all relevant factors have been taken into account
- shows how we have considered the [consultation responses](#).

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

Read the permitting decisions in conjunction with the environmental permit. The introductory note summarises what the permit covers.

Key issues of the decision

The permit authorises temporary storage of solid hazardous wastes pending onward transfer at A1 Hazardous Transfer Station, Salford. Storage operations will take place within a building that utilises a sealed drainage system, the surface is concreted and impermeable. The permit area is covered by a three sided building, waste is stored in bays within the building to allow segregation and isolation of materials. The site is permitted to accept up to 100,000 tonnes of waste annually with 1,000 tonnes stored at any given time. An overview of the operation of the facility is described as follow:

- Pre-acceptance of waste. Pre-acceptance is carried out to ensure that only appropriate wastes are accepted by the site, the types of wastes acceptable are described in Table S2.2 of the permit.
- Waste acceptance and storage. Waste arrives at the facility and is offloaded in a reception area, checked and sampled before being formally accepted or rejected on to the site. Waste is then allocated an appropriate storage bay within the facility.
- Dispatch. Waste is transferred from the site to an appropriate final processing location.

The Schedule 1 listed activities undertaken at this installation are:

- Section 5.6 Part A(1)(a) – Temporary storage of hazardous waste pending any of the activities listed in Section 5.1, 5.2 and 5.3.

Directly associated activities relate to surface water management. Surface water runoff from inside the covered area of the installation is captured in a collection sump and its contents is transferred off-site through a registered waste carrier. Roof water is collected and utilised on-site for dust suppression, excess roof water is discharged to a surface water drain leading to the River Irwell.

The site (National Grid Reference: SD 80489 00866) is located south of Overman Way within Agecroft Commerce Park, Salford, Greater Manchester. The site is located 320 metres west of the River Irwell between the areas of Irlams o' th' Height and Lower Kersal. The closest residential receptors are approximately 218 metres to the east of the site. The Rochdale Canal Special Areas of Conservation (SAC) is a European Site and is located 8.5 km east of the site. There are no Sites of Special Scientific Interest (SSSI) within 2km of the site.

Site infrastructure and drainage:

The permitted area is covered by an impermeable concrete surface with a fully sealed primary containment system. The transfer station building is enclosed on three sides with a roof that extends to the boundary edge. The building is segregated into the following areas;

- Four discrete storage bays;
- Reception area; and
- Quarantine Area.

Runoff from any of these areas is intercepted by a cut-off drain and directed (by gradient) to a subsurface sump. As the site is covered by a building, rainwater is not collected inside the building. The sump and silt traps are checked at regular weekly intervals and emptied when at 75% capacity. The waste from the sump is pumped to an IBC, sampled and analysed to determine the appropriate classification and disposal route. Contents of the sump are analysed in accordance with Waste Classification - Technical Guidance (WM3). Secondary containment measures are provided by a raised speed bump located beyond the cut-off drain on the open side of the building, further preventing surface water leaving the facility. The measures meet the requirements set out in SGN5.06.

Dust management:

The operator has developed a dust management plan which forms "Appendix C - Report No. 12604/2A" dated, July 2020. The plan has been developed using the Control & Monitor Emissions for your Environmental Permit (<https://www.gov.uk/guidance/control-and-monitor-emissions-for-your-environmental-permit#dust-mud-and-litter>)

The plan considers local sensitive human and ecological receptors within screening distance, suppression systems and management from waste acceptance to storage, and onward transfer. The plan will be communicated to all staff. The site Operations Manager (OM) will have overall responsibility for control of waste operations, and is responsible for ensuring that the dust management plan procedures are followed and complied with. The following summary of measures are in place at the facility to avoid and suppress dust on the site:

Avoidance measures

- Storage areas are covered and located inside the three sided structure forming a barrier between the dust sources and receptors.
- Concrete surfaces at the site and access road are to be kept clean and free of dust.
- Wastes shall be rejected if they are considered unsuitable due to dust generating potential.

Suppression measures

- Soils are dampened down in the storage bays if they are dry using a water bowser.
- A road sweeper will be used on site roads if mud is tracking on to surrounding roads.
- Vehicles delivering wastes will be covered.

Monitoring measures

- Visual monitoring is carried out daily and include an assessment to determine if dust is becoming windblown from stockpiles or from vehicle tracking on the roads.
- Monitoring measures trigger the use of suppression systems if required.

The dust management plan details the reporting and complaints procedures and how complaints will be managed and investigated. The plan will be reviewed annually. We are satisfied that the operator's procedures will reduce the risk of dust arising from activities taking place at the facility.

Decision checklist

Aspect considered	Decision
Receipt of application	
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.
Consultation	
Consultation	<p>The consultation requirements were identified in accordance with the Environmental Permitting Regulations and our public participation statement.</p> <p>The application was publicised on the GOV.UK website.</p> <p>We consulted the following organisations:</p> <ul style="list-style-type: none"> - Local Authority – Environmental Health - Directors of Public Health - Public Health England (PHE) - Health and Safety Executive (HSE) - Food Standards Agency (FSA) <p>The comments and our responses are summarised in the consultation section.</p>
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 our guidance on legal operator for environmental permits.
The facility	
The regulated facility	<p>We considered the extent and nature of the facility at the site in accordance with RGN2 'Understanding the meaning of regulated facility', Appendix 2 of RGN 2 'Defining the scope of the installation', Appendix 1 of RGN 2 'Interpretation of Schedule 1', guidance on waste recovery plans and permits.</p> <p>The extent of the facility is defined in the site plan and in the permit. The activities are defined in table S1.1 of the permit.</p>
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. The plan is included in the permit.
Site condition report	The operator has provided a description of the condition of the site, which we consider is satisfactory. The decision was taken in accordance with our guidance on site condition reports and baseline reporting under the Industrial

Aspect considered	Decision
	Emissions Directive.
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>We have assessed the application and its potential to affect all known sites of nature conservation, landscape and heritage and/or protected species or habitats identified in the nature conservation screening report as part of the permitting process.</p> <p>We consider that the application will not affect any sites of nature conservation, landscape and heritage, and/or protected species or habitats identified.</p>
Environmental risk assessment	
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> <p>The assessment shows that, applying the conservative criteria in our guidance on environmental risk assessment, all emissions may be categorised as environmentally insignificant.</p>
Operating techniques	
General operating techniques	<p>We have reviewed the techniques used by the operator and compared these with the relevant guidance notes and we consider them to represent appropriate techniques for the facility.</p> <ul style="list-style-type: none"> • Sector Guidance Note S5.06: Guidance for the Recovery and Disposal of Hazardous and Non Hazardous Waste <p>The operating techniques that the applicant must use are specified in table S1.2 in the environmental permit.</p>
Permit conditions	
Waste types	<p>We have specified the permitted waste types, descriptions and quantities, which can be accepted at the regulated facility.</p> <p>We are satisfied that the operator can accept these wastes for the following reasons:</p> <ul style="list-style-type: none"> • they are suitable for the proposed activities • the proposed infrastructure is appropriate • the environmental risk assessment is acceptable. <p>We made these decisions with respect to waste types in accordance with:</p> <ul style="list-style-type: none"> • Technical Guidance WM3: Waste Classification - Guidance on the classification and assessment of waste. • Sector Guidance Note S5.06: recovery and disposal of hazardous and non-hazardous waste.
Emission limits	We have decided that emission limits are not required in the permit.

Aspect considered	Decision
Operator competence	
Management system	<p>There is no known reason to consider that the operator will not have the management system to enable it to comply with the permit conditions.</p> <p>The decision was taken in accordance with the guidance on operator competence and how to develop a management system for environmental permits.</p>
Technical competence	<p>Technical competence is required for activities permitted.</p> <p>The operator is a member of an agreed scheme.</p> <p>The permit has been issued during the coronavirus (COVID-19) pandemic. During this time test centres were closed. The Agency has advised operators that we will not regard the failure to complete and pass any of the assessments in the circumstance where a continuing competence assessment becomes due after 16 March 2020, until 30 September 2020.</p> <p>We are satisfied that the operator is technically competent.</p>
Relevant convictions	<p>The Case Management System and National Enforcement Database have been checked to ensure that all relevant convictions have been declared.</p> <p>No relevant convictions were found. The operator satisfies the criteria in our guidance on operator competence.</p>
Financial competence	<p>There is no known reason to consider that the operator will not be financially able to comply with the permit conditions.</p>
Growth Duty	
Section 108 Deregulation Act 2015 – Growth duty	<p>We have considered our duty to have regard to the desirability of promoting economic growth set out in section 108(1) of the Deregulation Act 2015 and the guidance issued under section 110 of that Act in deciding whether to grant this permit.</p> <p>Paragraph 1.3 of the guidance says:</p> <p>“The primary role of regulators, in delivering regulation, is to achieve the regulatory outcomes for which they are responsible. For a number of regulators, these regulatory outcomes include an explicit reference to development or growth. The growth duty establishes economic growth as a factor that all specified regulators should have regard to, alongside the delivery of the protections set out in the relevant legislation.”</p> <p>We have addressed the legislative requirements and environmental standards to be set for this operation in the body of the decision document above. The guidance is clear at paragraph 1.5 that the growth duty does not legitimise non-compliance and its purpose is not to achieve or pursue economic growth at the expense of necessary protections.</p> <p>We consider the requirements and standards we have set in this permit are reasonable and necessary to avoid a risk of an unacceptable level of pollution. This also promotes growth amongst legitimate operators because the standards applied to the operator are consistent across businesses in this sector and have been set to achieve the required legislative standards.</p>

Consultation

The following summarises the responses to consultation with other organisations, and the way in which we have considered these in the determination process.

Responses from organisations listed in the consultation section

Response received from
Salford City Council
Brief summary of issues raised
<ul style="list-style-type: none">- Baseline contamination conditions have not been submitted.- Sump and site drainage arrangement / adequacy.- Condition of the sealed drainage area is unknown.
Summary of actions taken or show how this has been covered
Baseline conditions were requested and received as part of the determination stage of the application. The baseline data forms part of "Report No 12604/1B", dated July 2020. Site infrastructure and drainage has been discussed in the <u>key issues</u> section of this decision document.

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