EP Surrender Application

Appendix B: Surrender Supporting Statement

OCO_2024.02/01_v1 dated March 2025

Brandon Aggregate Manufacturing Facility, Suffolk

Appendix B: Site Surrender Report, for EP Full Surrender Application

Client: O.C.O Technology Limited, Montague Place Quayside, Chatham Maritime, Chatham, Kent, ME4 4QU

Report: Full EP Surrender Application – Appendix B Site Surrender Report, OCO_2024.02/02_v1, 25 March 2025

Site: Brandon Aggregate Manufacturing Facility, High Street, Brandon, Suffolk, IP27 0AX (EPR/JP3332FK)

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1 INTRODUCTION

1.1 General

O.C.O Technology Ltd (the 'applicant') has requested that Reva Environmental Ltd (the 'agent') prepares an Environmental Permit (EP) surrender application, for its aggregate manufacturing facility at Brandon, Suffolk, IP27 0AX.

The EP that is the subject of this surrender application (ref. EPR/JP3332FK) was originally granted on 6 December 2011 which was granted to Carbon8 Aggregates Limited. Several variations followed this, to reflect the installation of the second treatment line, to amend the boundary, add EWC codes, and increase waste throughput. Variation V007 was granted to reflect the operator's legal company name from Carbon8 Aggregates Limited to O.C.O Technology Limited.

The facility treats air pollution control (APC) residues to create an aggregate that can be used in construction product manufacture. The site is permitted to treat up to 40,000 tonnes per year and is also permitted to treat non-hazardous waste up to 9,000 tonnes per year, and inert waste up to 2,000 tonnes per year, in the area of land shown in Figure SS1 of the Supporting Statement (Ref. OCO_2024.02/01_v1).

1.2 Permitting and Operational History

The most recent variation to the permit was in March 2023 to allow for additional storage of CO_2 as a raw material, increasing to 78 tonnes by the installation of a second tank with 50 tonne capacity. This was variation notice V010 and was issued as a varied and consolidated EP.

The permitted activities are currently non-operational however the decommissioning process has not yet commenced in earnest. This application is being submitted on the understanding that notification can and will be provided to the EA at the point of removal/isolation of equipment from the site. Photographs and other evidence will be provided at the time, as required by the EA to determine the suitability of surrendering the EP. It is considered likely that this will be available at the point the application is picked up for determination (following duly making).

1.3 Context

This Site Surrender Report (SSR) has been written to support the surrender application for the site. An SSR is required by application form Part E2, Question 4, and has been produced in accordance with the EA's H5 guidance.

The purpose of the SSR is to describe the site/activities at the time of surrender, to identify any significant changes since EP issue, to present pollution control measures that have been in place for the life of the EP, and to detail any pollution incidents that have occurred and how any potential impact from them was remedied. It also presents details of any decommissioning or removal of infrastructure that could present a pollution risk.

It enables the operator to demonstrate that the land has been protected during the lifetime of the EP and that it is in a satisfactory state at the point of surrender.

A copy of the H5 form, with all sections addressed as required, is provided in Annex SSR1. As noted in the Supporting Statement, an H5 form was submitted for the original 2011 application. The updated version of the H5 form includes the parts required for surrender (8 – 10) which have been addressed now; parts 1 – 3 are from the 2011 submission, and parts 4 – 7 have been addressed retrospectively. A number of the headings required by the H5 template are not applicable to the site, however all headings have been included in this report for completeness and non-applicability clearly identified where that is the case.

1.4 Site Location

The installation is located in Brandon, Suffolk at National Grid Reference TL 78466 87202. The nearest residential area is approximately 70 m away. A railway line and station lie just to the north of the site and the River Ouse lies approximately 0.3 km to the south, running in a west to easterly direction. Access to the site is via the main entrance, to the west, off High Street.

The A1065 Mundford Road provides access to the High Street to the north and is the main access into and out of Brandon.

The site is not within a Groundwater Source Protection Zone (SPZ); there are none designated within 1 km of the site. The site is situated on a Principal bedrock aquifer identified as being high vulnerability, with well-connected fractures (a 'high' pollutant speed). This classification considers geology, land use, and hydrogeology and describes the vulnerability of groundwater to pollution.

According to the groundwater flooding map, there is the potential for groundwater flooding to occur at the surface. Whilst the datasheet suggests that the site is surrounded by areas designated as being at risk of extreme flooding from rivers or sea without defences, the surface water flooding map identifies the site as being not at risk of flooding.

2 CHANGES TO THE ACTIVITY

Section 4.0 of the H5 form requires details to be provided as to any changes to either the activity boundary, or to the permitted activities.

The EP boundary was changed by variation V002 which was determined on 8 January 2014. This change was for the purpose of accommodating a second (identical) treatment line, and the associated raw material storage infrastructure and is presented in Figures SSR1 and SSR2 below.

Figure SSR1: Original EP Boundary

Figure SSR2: Current Site EP Boundary

In terms of the activities, whilst variations have allowed additional raw material storage, increased treatment throughput and additional EWCs, the inherent purpose of the site and activities undertaken have remained consistent.

There have been no permanent deposits of waste, nor any 'dangerous substances' used or produced by the permitted activities.

3 MEASURES TAKEN TO PROTECT LAND

3.1 General

Activities at the site were limited to the receipt and treatment of permitted wastes in the permitted area. There was no permanent deposit of waste materials on the land.

No treatment processes were carried out other than the permitted ones; no liquid effluent was ever generated from the permitted activities. There were no point source emissions to surface water (controlled waters) and no point source emissions to air that could have had a significant impact through deposition on the land.

The following pollution prevention measures were in place at the site for the duration of its operational period under the control of the applicant:

- Vehicular access was secure and manned, ensuring all incoming vehicles (and waste) were supervised and appropriately checked.
- There was, and remains, no unauthorised public access to the site (minimising risk of vandalism/pollution). Security comprises palisade fencing and gates, lockable ladder guards on silos, and CCTV.
- Waste pre-acceptance and waste acceptance procedures ensured that waste arriving at site was allowed by the EP and that it was checked by a competent person.
- Wastes were all delivered in sealed powder tankers, with the transfer process into silos managed in terms of procedure, training and supervision.
- The use of only approved suppliers and contractors, including for key operational equipment (and maintenance of it).
- Regular inspection and maintenance carried out of waste silos, and all had integral dust filters.
- Use of sealed screw conveyors to move materials into and through the process building.
- No surface water entered or left the site; the only contribution to run-off being rainwater falling on the site.
- Roof water run-off was captured by the surface water management system and pumped to a storage tank for use in the manufacturing process.
- Presence of impermeable hardstanding and surface water management infrastructure provided protection.

3.2 Compliance Records

The applicant has a number of CAR forms on file for the site, but not dating back to the original permit in 2011. As such, a Freedom of Information Act request was submitted to the EA in order to obtain a full set of compliance records for the site.

This resulted in a set of 12 compliance assessment reports (CARs and 1 WAR) being reviewed for the purposes of this application; these are summarised in Table SSR1.

Table SSR1: Compliance Record Review

Date	Findings	Surrender Comments
22/01/2024	Desk based review of compliance with reporting requirements – no breaches recorded.	No comment – the CAR supports the applicant case that the site has been operated correctly and compliantly.

Date	Findings	Surrender Comments
	EA confirmed receipt of the annual performance report (for 2023) for energy and water usage, production/treatment. The CAR notes acceptance of these as satisfactory and compliant with reporting requirements.	
09/03/2023	Desk based review of compliance with reporting requirements – no breaches recorded. EA confirmed receipt of the annual performance report (for 2022) for energy and water usage, and acceptance of these as satisfactory and compliant with reporting requirements.	No comment – the CAR supports the applicant case that the site has been operated correctly and compliantly.
28/02/2023	Routine inspection – no breaches recorded. Operations and activities were recorded as being in line with the permit. Specific mention was made of the installation of a new CO2 tank under the provisions of an LEP pending EP variation.	No comment – the CAR supports the applicant case that the site has been operated correctly and compliantly.
30/07/2021	Routine inspection – no breaches recorded. The visit was carried out to check work during the COVID pandemic. All processes checked (pre-acceptance, permitted activities, storage, throughput, operating techniques) were found to be appropriate and in accordance with the permit.	No comment – the CAR supports the applicant case that the site has been operated correctly and compliantly.
30/07/2021	Waste Audit Report (WAR) – no breaches recorded. During the site visit (above) a check was carried out of hazardous consignment notes. This included a later review of Q1 2021 waste returns on 09/08/2021. The checks confirmed that there were no issues.	No comment – the CAR supports the applicant case that the site has been operated correctly and compliantly.
20/12/2019	Routine inspection – no breaches recorded. First inspection since the change of name. All processes checked (pre-acceptance, permitted activities, waste acceptance, storage, throughput, operating	No comment – the CAR supports the applicant case that the site has been operated correctly and compliantly.

Date	Findings	Surrender Comments
	techniques, process trials) were found to be appropriate.	
06/08/2019	This CAR was provided to confirm completion of a data review following notification from the operator of a change of name from Carbon8 aggregates to O.C.O Technology Limited. No breaches recorded.	No comment – the CAR supports the applicant case that the site has been operated correctly and compliantly.
01/05/2018	Routine unannounced site inspection – no breaches recorded. This visit followed the variation of the permit in February 2018 to add EWC codes and to update the EP to modern conditions. Observations were made that there were no obvious dust or fugitive emissions during the unloading of APCr from the powder tanker into the silo. There was also a review of hazardous waste consignment notes (x 3) and the EA was satisfied that these were being completed correctly.	No comment – the CAR supports the applicant case that the site has been operated correctly and compliantly.
08/08/2016	Routine inspection – no breaches recorded. Observations were made that there were no obvious dust or fugitive emissions during the unloading of APCr from the powder tanker into the silo.	No comment – the CAR supports the applicant case that the site has been operated correctly and compliantly.
01/08/2015	This CAR was provided to confirm receipt and review of site waste returns. A breach was recorded as the waste return for the period Apr-Jun 2015 was not submitted on time.	No comment – the breach does not relate to a non-compliance with any conditions relating to on-site activities that could cause environmental impact.
11/03/2014	Inspection carried out following the revision of the permitted boundary and installation of Line 2. No breaches or non-compliances were noted. This CAR notes the removal of the historic (redundant) oil storage tank and bunded area located between the building and the railway line, and that this has improved the visual impact of the site. It also notes	No comment – the CAR supports the applicant case that the site has been operated correctly and compliantly.

Date	Findings	Surrender Comments
	that this was not within the EP boundary nor associated with the EP activities.	
03/04/2013	Inspection carried out following EA restructuring (Future Approach to Regulation) which saw the facility transfer into a new Waste Regulatory Team based in Ely. The inspection served as an introduction for the team but also picked up the site as it had not yet been audited since being granted a permit in December 2011. No breaches or non-compliances were noted. A note was made as to a noise emanating from one of the conveyor belts (though no complaints had been received) and the operator was tasked with following this up.	No comment – the CAR supports the applicant case that the site has been operated correctly and compliantly.

Copies of the EA documents referenced above are included in Annex SSR2. It is noted that the site has maintained a Band A compliance rating for the duration of its permit.

The site was operated, as for other O.C.O permitted sites, in accordance with site rules and procedures (the Integrated Management System). A copy of the IMS Manual (ref. MP_GEN_001, v10 3 October 2024) which covers Brandon as well as the Leeds, Wretham, and Avonmouth sites is provided in Annex SSR3.

4 POLLUTION INCIDENTS

The applicant holds no records of any pollution incidents during the operation of the site under the existing permit. The CARs summarised above support this as no incidents or potential pollution risks are identified.

It is noted that the characteristics of any pollution that could have occurred would differ significantly from previous operations on the site. The activity processed waste that has a high pH and a notable heavy metal content and dioxins/furans (albeit at restricted limits). Details of the on-site and near-site historical and current activities are detailed in the Landmark Envirocheck Report provided in Annex SSR4. This is summarised in the Landmark Summary Report in Annex SSR5 (ref. OCO_2024.02/03_v1). Published information suggests that any potential contamination from the O.C.O activities would be discernible from surrounding activities and historical contamination.

5 SOIL GAS AND WATER QUALITY MONITORING

The EP does not require any monitoring to be undertaken so none has been collected during the operational phase of the site.

There was no site investigation carried out prior to the operating of the site under the EP.

6 DECOMMISSIONING AND REMOVAL OF POLLUTION RISK

At the point of submission of this application, operations have ceased at the site.

The following measures have been, and will be taken, in order to decommission and decontaminate the site. A set of procedures will be created that will detail specifically the decontamination process for equipment prior to dismantling and removing it from the site. There will also be testing undertaken, where appropriate, to ensure that the correct classification is applied to waste if decontamination is not feasible.

- Treatment lines have yet to be physically removed however critical components have been isolated to ensure that the site cannot operate, for example plant has been isolated at the distribution boards.
- The waste storage silos are, for the most part, empty and any residual contents will be removed before the site is handed back. Storage silos are likely to be retained as these may be of use to the future tenant but are not required by O.C.O.
- Both CO2 tanks are nearly empty and will be removed from the site; the newer one added in the past few year will be transported for use at another O.C.O facility.
- The diesel storage tank was only installed on the site in 2024. It is a proprietary, double-skinned, container that holds approximately 1500 litres. This will be emptied (any remaining diesel can be recovered) and sold or taken to another O.C.O facility.
- The site buildings will remain on site, including the internal office and welfare units, ready for use by a future tenant. These will be cleared out to the extent they will be empty buildings. Whilst this is led primarily by the desire to clear the site of any potential pollution sources, this is also a requirement of the applicant's tenancy agreement with the current landowner.

Any hazardous substances at the site will be drained, collected, and transferred off site to an appropriately licensed facility for recovery or disposal.

Where possible, any plant or equipment not needed will be segregated into component parts to facilitate recovery by recycling. Records will be kept of all materials removed from the site, noting the need to comply with the relevant waste regulations regarding duty of care and waste hierarchy.

7 REFERENCE DATA AND REMEDIATION

The site is considered to have been operated in compliance with its permit in terms of the types and quantities of wastes received, and the requirement to manage potential pollution sources in order to protect the environment. The CAR records, which are robust and complete for the period of the permit, have not identified any non-compliances, nor have any site records included any pollution events. No remediation has been identified as being necessary or required.

Of key relevance is that the nature of the activities carried out within the EP boundary were inherently of low risk in terms of potential impact on receiving land and/or aquatic environments.

The local EA officer has suggested that the application could take the form of a 'low risk surrender'. For such an application, the guidance notes that intrusive investigation is not required. To confirm this approach, consideration has been given to the low-risk nature of the operations, the lack of recorded incidents, the presence of hardstanding across the building and external storage/vehicle manoeuvring and loading areas, and the lack of potential hazards or pathways. The applicant has determined that the site should meet the low-risk criteria and that no site investigation/collection of reference data is required for this application. This decision process is presented as a screening exercise which is given in Table SSR2.

Table SSR2: Pollution Potential - Screening Assessment

Activity & Infrastructure	Pollution Source & type	Pathway & Receptor	Mitigation Measures	Screened out? Y/N
Acceptance of waste – across yard area and into one of 3 silos for storage pending treatment	Untreated hazardous wastes – containing heavy metals, dioxins/furans	Via drain network into surface water course; Via ground into ground and groundwater	Yard area benefits from impermeable concrete hardstanding. Silos are situated on a bund, are subject to an inspection and maintenance programme. Silos are enclosed, with dust filters. Waste is dry, any spillage would likely be carried off site with surface water or via dispersion to air.	Y
Transfer of waste materials into the process building	Untreated hazardous wastes – containing heavy metals, dioxins/furans		Waste is conveyed to the enclosed mixing chamber in the process building using sealed screw auger conveyors. Area under the route is impermeable concrete hardstanding. Movement is at height to avoid collision with vehicles and maintain integrity of containment.	Y
Stage 1 treatment of waste in reactor (addition of CO_2 and water) to reduce pH and the leachability of some heavy metals)	Waste mid-treatment		Process is carried out inside the building which benefits from impermeable concrete hardstanding. Process plant is subject to an inspection and maintenance programme.	Y
Stage 2 treatment of waste – addition of cement, sand and water.	Waste mid-treatment		Process is carried out inside the building which benefits from impermeable concrete hardstanding. Process plant is subject to an inspection and maintenance programme.	Y

Activity & Infrastructure	Pollution Source & type	Pathway & Receptor	Mitigation Measures	Screened out? Y/N
Storage of raw materials	Cement, carbon dioxide, and sand		Carbon dioxide is stored as a gas in two storage tanks. Cement (binder) is stored in silos 4 and 5. Sand (filler) is stored in dedicated, covered, storage areas which benefit from impermeable concrete hardstanding The raw materials are inert and don't represent a pollution risk	Y
Storage of fuel – in a single diesel storage tank	Diesel oil		Storage is in a new, proprietary tank; subject to an inspection programme; tank is double skinned with containment of the fill point	Y
Storage of treated material	Treated waste – meets end of waste test so no pollution source		Rainwater run off from any areas of storage of materials is via drainage which includes catchment pits. These allow any fines/particulates to settle out	Y

8 STATEMENT OF SITE CONDITION

Based on the evidence available, it is considered that the permitted activities were carried out at the site in accordance with the conditions of the permit.

Information available confirms that there have been no emissions to air, land or water that could give rise to pollution. There are no reports of any potentially polluting incidents during the lifetime of the existing permit.

Due to the continued compliance with the permit conditions, and the nature of the activities in terms of low risk of pollution potential, it is considered that the land remains in a satisfactory condition and can be surrendered.