



Bay Lane SRF

Bay Lane SRF Waste licence application

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1 BEST AVAILABLE TECHNIQUES (BAT) ASSESSMENT

The facility will not be a landfill i.e. it will be a waste recovery, not a waste disposal activity. Regardless, BAT for the activity is taken to be best represented by the guidance given in the EPA Guidance Note on Best Available Techniques for the Waste Sector: Landfill Activities (2011), insofar as it relates to the backfill activities at this facility. Where relevant, reference will also be made to BAT Guidance Note on Best Available Techniques for the Waste Sector: Waste transfer and Material Recovery, December 2011.

The approach taken will be the most effective in achieving a high general level of protection of the environment having regard to the way the facility is located, designed, built, managed, maintained, operated and decommissioned.

1.1 BAT HIERARCHY

The BAT hierarchy extracted from the guidance document is reproduced below. The emphasis of the BAT hierarchy is on pollution prevention techniques rather than treatment.

The IPPC Directive 2008/1/EC and the Environmental Protection Agency Acts 1992 to 2007 (Section 5(3)), require the determination of BAT to consider in particular the following, having regard to the likely costs and advantages of measures and to the principles of precaution and prevention:

- (i) Use of low-waste technology.
- (ii) Use of less hazardous substances.
- (iii) Furthering of recovery and recycling of substances generated and used in the process and of waste, where appropriate.
- (iv) Comparable processes, facilities or methods of operation, which have been tried with success on an industrial scale.
- (v) Technological advances and changes in scientific knowledge and understanding.
- (vi) Nature, effects and volume of the emissions concerned.
- (vii) Commissioning dates for new or existing activities.
- (viii) Length of time needed to introduce the best available techniques.
- (ix) Consumption and nature of raw materials (including water) used in the process and their energy efficiency.
- (x) Need to prevent or reduce to a minimum the overall impact of the emissions on the environment and the risks to it.
- (xi) Need to prevent accidents and to minimize the consequences for the environment, and
- (xii) Information published by the Commission of the European Communities pursuant to any exchange of information between Member States and the industries concerned on best available techniques, associated monitoring, and developments in them, or by international organisations, and such other matters as may be prescribed.

GLV Bay Lane Limited will implement the waste hierarchy and apply the following:

- Waste prevention: GLV Bay Lane Limited will segregate any noncompliant wastes that may enter the site in soil and stones as soon as is reasonably practicable before it can be deposited with inert waste soil and stones.
- Waste minimisation: GLV Bay Lane Limited will design its waste acceptance and management procedures at Bay Lane soil recovery facility to minimise the production of non-inert waste.
- Waste reuse: GLV Bay Lane Limited will endeavour, where reasonably practicable, to reuse waste to avoid the requirement for waste recovery, disposal.
- Waste recycling: GLV Bay Lane Limited will endeavour, where reasonably practicable, to recycle waste generated to avoid the requirement for waste recovery, disposal.
- Volume reduction: GLV Bay Lane Limited will endeavour, where reasonably practicable, to reduce the volume of waste requiring recovery or disposal.
- Waste disposal: Off-site disposal of non-inert wastes to a permitted Landfill or recovery Site for each waste stream.

1.2 BAT CONSIDERATIONS

The only activities to be conducted at the Bay Lane Soil Recovery Facility are the acceptance and recovery of inert soil and stone, including temporary storage pending final use. No hazardous waste will be accepted at the facility. There will be no processing of the incoming waste materials other than extraction of inappropriate materials.

Waste accepted for restoration of the lands will be either

- Temporarily stored pending final recovery
- Directly recovered

The generation of wastes onsite is low. Any wastes that inadvertently enter the site will be segregated and placed in the quarantine area prior to offsite disposal or recovery at approved facilities.

Any canteen waste arising from the site activities will be appropriately segregated and stored for collection by an authorised waste collector for recycling and disposal at appropriate facilities.

There are limited opportunities to apply Best Available Technology (BAT) with respect to the proposed recovery operations. Consideration is given to control and abatement measures to ensure the facility will continue to operate within accepted emission limit values for this type of operation to prevent and minimise the risks to the environment. The consideration given to compliance with the relevant BAT guidance is presented below:

- The proposed development has been subject to the preparation of an Environmental Impact Statement. There are no issues surrounding environmental pollution.
- The facility will operate in accordance with the terms of the EPA Waste Licence and the facility's Environmental Management System.
- An Environmental Management System will be developed and implemented at the facility in line with the GLV Bay Lane Limited policy.

- The facility will offer a licensed outlet for this soil and stone waste stream for the region, supporting sustainable regional development.
- The proposed activity is a simple-technology and is low-risk.
- The facility environmental/pollution risk from the activity is low.
- The proposed approach is well proven and accepted for the restoration of other quarries/voids as outlined in the Eastern Region Waste Management Plan.
- There will be no emissions to sewer, and minimal emissions to ground via the proprietary site waste water treatment system.
- The activity will not generate landfill gas or leachate
- Incoming material will be free of biodegradable waste and will therefore not create odours or attract vermin or birds.
- Potential noise and dust emissions will be controlled via prescribed mitigation measures, which will be incorporated into the site Environmental Management System. Due regard was given to the requirements of EPA BAT notes (EPA (2011) BAT Guidance Note on Best Available Techniques for the Waste Sector: Landfill Activities; and EPA (2011) BAT Guidance Note - Waste Sector (Transfer & Materials Recovery)) in assigning mitigation measures.
- Outgoing vehicles will pass through a wheel wash to prevent soil from being carried out onto the road.
- The facility will not be an intensive energy/water-user.
- There will be controlled fuel management (vehicle fuelling using mobile fuel bowsers on designated refuelling points, no onsite fuel storage) on site, as recommended by BAT.
- Emergency response procedures will be incorporated into the Environmental Management System.
- A rigorous Waste Acceptance Procedure will be implemented. Input material will be inspected/tested, where required, prior to delivery to site, to confirm their suitability.
- All material-in and material-out will be recorded and summary data reported to the Agency as part of Annual Environmental Reporting obligations.
- The facility will be managed by a competent, experienced, qualified management team with due regard for the local community and for the public.
- An environmental monitoring programme will be implemented that will be in accordance with licence conditions.
- The site will be progressively restored, on a planned and phased basis, in accordance with the site restoration/phasing plan. Final cover and planting will be implemented on the completed phases as soon as practicable.

1.3 BAT UNDERTAKING

GLV Bay Lane Limited will endeavour to protect the environment and, as part of the Waste Licence process, will identify the potential waste arisings from its undertakings and identify how these will be managed through the use of Best Available Techniques (BAT).

The Company will aim to carry out activities in a manner that minimises waste production (volumes and mass) and will dispose of wastes arising in a manner which minimises their environmental impact.

1.4 ENVIRONMENTAL MANAGEMENT SYSTEM

GLV Bay Lane Limited is committed to preparing a robust environmental management system (EMS) upon receipt of a Waste Licence. The EMS will:

- Identify, plan for and establish the necessary procedures, objectives and targets in association with financial planning and investment to safeguard the environment
- Identify the
 - structure and responsibility for environmental management at the facility
 - levels of training, awareness and competence of individuals at the facility
 - stakeholder and community engagement processes and actions
 - documentation and procedures and environmental management processes that assure compliance with environmental legislation
- Ensure that environmental responsibilities and risks for GLV Bay Lane Limited are monitored and measured, that records are kept and maintained and that actions are implemented.

The EMS will be put in place with continued environmental monitoring of noise, dust, surface and groundwater on site. GLV Bay Lane Limited commits to review the control and abatement measures employed. The measures implemented will ensure that emissions from the facility activities will not result in the breaking of any relevant standard, including any for an environmental medium, or any associated emission limit value.

1.5 BAT CONCLUSIONS

The proposed GLV Bay Lane Limited restoration project will be operated in such a way that all appropriate measures are implemented to prevent pollution through the application of BAT. This will be achieved through the design of, and adherence to, a robust environmental management system that is accordance with the conditions of the Waste licence issued for the facility.

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