

Appendix 1. Waste Site Review: Brunel Road Waste Transfer Station

Report Summary

Overview

Environmental consultants Enzygo were commissioned by TDC to review the viability of the waste transfer station in June 2023, in relation to the changes to the Environment Agency's T4 Waste Exemption and future operations on the site. Enzygo are specialists in Environmental Permitting and Regulation and have provided support to a wide range of public and private sector clients in the waste industry.

The review considered the following:

- Gap analysis between the site operations and the EA's Fire Prevention Plan guidance focussing on layout, separation distances and waste pile size.
- Gap analysis between site layout and the EA Appropriate Measures guidance. This is a high-level review considering requirements associated with the site layout.
- Gap analysis between site layout and the most appropriate Standard Rules Environmental Permit.

The review focused on;

- Building and infrastructure on site
- Drainage
- Locations of waste storage

Conclusions

The review of the current T4 waste exemption and the proposed replacement exemption showed that neither are appropriate for the activities carried out at the site as it does not permit the acceptance of food waste. There are no other waste exemptions available which allow the storage of food waste.

The site is also not able to meet the following requirements of the replacement waste exemption:

- Other than glass, each waste stack must have a separation distance of at least 6 meters between other waste stacks and the site perimeter, any buildings, or other combustible or flammable materials.
- Waste contaminated with food and drink residues must be stored in sealed containers or indoors.
- Plastic, cans and foil stored outside must be baled or in an enclosure designed and maintained to prevent litter.

The second two points listed above could be addressed by placing a roof over the existing bays, however there is not enough room on the site for the requirement to have a separation distance of 6m.

The available 'Standard Rules Permits' which could be applicable to the activities carried out were also reviewed. The conditions required in these permits could not be met. As these conditions are fixed there are no 'Standard Rules Permits' currently available for the activities carried out and waste types accepted at the site.

A 'Bespoke Permit' will be required to continue operating the site.

Gaps have been identified with the infrastructure and the requirements of the Environment Agency's 'Appropriate Measures for the Treatment of Inert and Non-Hazardous Waste' and 'Fire Prevention Plan' documents. The gaps should be investigated in more detail to establish the viability of resolving them. These gaps include;

- Investigate a location within your site for a quarantine area/s which can be mobile or static.
- Enclosing the conveyor and hopper.
- Review your current netting arrangements, particularly around the hopper and conveyor as there was a reasonable amount of escaped 'litter' at the back of the hopper.
- Your current infrastructure should be assessed against the requirements of CIRIA 736 if this was not done when it was constructed. This needs to be undertaken by a qualified engineer.
- A fire wall should be erected along the western edge of the site where the hopper and conveyor are located.
- The bay walls need to be scrutinised by an appropriately certified company to ensure they meet the requirements of the fire prevention plan guidance.
- Your drainage plan needs to be reviewed and where there is the potential for effluent to be generated through the storage of waste this effluent should be directed to the foul sewer.
- A site wide bund should be installed to ensure that in the case of a fire all firewater can be retained on site.
- To stop firewater entering the surface water system, drain mats or other materials to inhibit the progress of firewater entering the surface water drainage system should be investigated.
- Liaison with the local Fire and Rescue Service should be undertaken to determine the location of any local fire hydrants, whether they would be able to

be utilised in the case of a fire, and access requirements to allow fires to be extinguished effectively if one should occur.

- A review of the current trade effluent discharge should be undertaken with South West Water to determine if an increase in flow is required.
- An appropriately certified organisation should be contacted to discuss fire detection and suppression systems for the site.