CHALLONSLEIGH FARM INERT LANDFILL SITE D

Environmental Permit Application

Operating Techniques

April 2025

Document control

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1.0 Introduction

1.1 Report Context

1.1.1 This document has been prepared by Dre, a division of Dde (SW) as part of an Environmental Permit Application for Challonsleigh Farm inert landfill site D.

1.1.2 Dde (SW) Ltd currently hold four standard environmental permits (reference EPR/HB3208TQ, EPR/HB3208UP, EPR/GB3402FP and EPR/JP3196EW) to allow the recycling of materials at sites A,B and C Challonsleigh Farm Recycling Facility.

1.1.3 This document has been prepared to detail the operating and management procedures related to the proposed landfill operations.

2.0 Operating Procedures

2.1 Proposed Permitted Activities

2.1.1 Dde (SW) Ltd will undertake landfilling of site D at Challonsleigh Farm. Only materials that are classified as inert shall be deposited onto the land

2.1.2 The landfill operations shall be conducted in eight phases to minimise any potential environmental impact across the site

2.1.3 At each of the phased areas the top soils shall be stripped off and stockpiled in designated points. The inert fill shall be brought to site by road transport, tipped and spread mechanically in even layers to varying depths to follow the proposed landscape plan (refer to drawing No.5149237-ATK- DR- C- ESID6A). Top soils shall be utilised to cover the imported fill. Each phase shall be carried out concurrently with others although emphasis shall be on completing adjacent phases fully as soon as is practical

2.2 Waste Types

2.2.1 As part of the landfill operation, only inert waste as classified under the Landfill Directive (1999/31/EC) and Council Decision (2003/33/EC) of 19 December 'establishing criteria and procedures for the acceptance of waste landfills' will be accepted at Challonsleigh Farm inert landfill site D.

2.2.2 The permitted waste types, as specified within Schedule 2 of the environmental permit, are provided in the Table below.

Permitted Waste Types

01 04 08 - Waste gravel and crushed rocks other than those mentioned in 01 04 07

01 04 09 - Waste sand and clays

10 11 03 - Waste glass based fibrous materials (only without organic binders)

10 12 08 - Waste ceramics, bricks. tiles and construction products (after thermal processing)

15 01 07 – Glass packaging

17 01 01 – Concrete (selected c and d waste only)

17 01 02 – Bricks (selected c and d waste only)

17 01 03 – Tiles and ceramics (selected c and d waste only)

17 01 07 – Mixtures of concrete, bricks, tiles and ceramics (selected c and d waste only)

17 02 02 – Glass

17 05 04 – Soil and stones (Excluding topsoil, peat, and soil from contaminated sites)

19 12 05 - Glass

19 12 09 – Minerals (for example sand, stones etc.)

19 12 12 – Other wastes (including mixtures of materials from mechanical treatment of wastes other than those mentioned in 19 12 11

20 01 02 – Glass (separately collected glass only)

20 02 02 – Soil and Stones

2.2.3 The proposed waste types will derive from the accepted inert wastes brought to site and any surplus processed materials from the Dre existing aggregate recycling facility that is located to the north of the landfill site at National Grid Reference SP 22920 80890. The facility is regulated under a separate standard rules permit (EPR/JP3196EW) to allow the treatment of waste to produce soil, soil substitutes and aggregates in accordance with the standard rules set SR2010 No12.

2.2.5 In accordance with the landfill operation, dde (SW) Ltd will ensure that any waste that is accepted under the proposed codes will be Landfill Directive Compliant inert waste. This will be achieved by implementing strict waste acceptance procedures that are detailed in Section 2.4 below.

2.3 Waste Quantities

2.3.1 In accordance with the planning conditions Dde (SW) Ltd are authorised to accept up to 1.3M tonnes of waste as part of the landfill operation at Challonsleigh Farm. Dde (SW) Ltd do not propose any changes to the waste throughput.

2.4 Waste Acceptance Procedures

2.4.1 The following section outlines the waste acceptance procedures for the proposed waste types only. Any other wastes will be subject to the existing waste acceptance procedures that are employed as part of the landfill operation at Challonsleigh Farm Inert Landfill site D.

Waste Acceptance at the landfill site

2.4.2 As mentioned in Section 2.2.1, any waste that's accepted under the proposed codes, will derive from the accepted inert materials brought to site and the existing aggregate recycling facility at Site A.

2.4.3 Although the aggregate recycling facility is permitted to accepted a variety of waste types (as specified under standard rules SR2010 No12), Dde (SW) Ltd will only accept specific wastes that are classed as inert in accordance with the Landfill Directive (1999/31/EC) and Council Decision (2003/33/EC) of 19 December 2002 'establishing criteria and procedures for the acceptance of waste landfills'. This will include waste concrete, tiles and ceramics that are characterised under the specified waste code identified in section 2.2.2

2.4.4 In accordance with the Council Decision 2003/33/EC, no topsoil or peat will be accepted under the above waste codes and no soil and stones will be accepted from contaminated sites.

2.4.5 It is proposed that the majority of the waste will be accepted at the landfill gate. Inert materials derived from the aggregate recycling facility will comprise of materials as identified in the list of waste codes Section 2.2. For these particular wastes, it is considered that Basic Characterisation will not be required as Dde is the producer of the waste. As such, it is proposed that these wastes will be accepted at the aggregate recycling facility with a Waste Transfer Note only.

2.4.6 The aggregate recycling facility will also accept wastes from external sources that comply with the environmental permit. Any waste that derives from an external source will be subject to Basic Characterisation to ensure that the waste is suitable for acceptance at the landfill site. The information to be supplied during basic characterisation will include:-

- Source and origin of the waste;
- Information on the process producing the waste;
- Appearance of the waste, e.g. physical form; and
- The List of Wastes (England) Regulations 2005 code.

2.4.7 In addition to the above, some waste types from external sources will also be subject to testing. In accordance with the Council Decision 2003/33/EC, the wastes to be accepted at the landfill site without testing will be subject to confirmation that they are single stream loads from known and reliable sources and that they are accompanied with the required information. Waste types for acceptance are identified in the list provided in Section 2.2/

2.4.8 Following basic characterisation, all vehicles delivering waste will be licensed waste carriers and each delivery must be accompanied by a relevant Waste Transfer Note, consistent with fulfilling the company's responsibilities under the provisions of the Duty of Care.

2.4.9 Each load of waste that is delivered from an external source shall be visually inspected upon arrival at the site. This will be undertaken before the waste is unloaded, where possible, and after unloading. These inspections will ensure that the waste conforms to the description provided in the Waste Transfer Note.

2.4.10 If there is uncertainty regarding the acceptance of wastes at the site, testing may be required. No wastes will be accepted onto the site if there is uncertainty as to its source, conformance with the conditions of the environmental permit and/or its suitability for the intended use.

2.4.11 In the event that a load is identified as unacceptable, the load will not be accepted at the Landfill site and will be removed from the site in accordance with the waste rejection procedures that

are currently employed on site A.

Waste Acceptance at site A Recovery Operation

2.4.12 Any waste that is accepted at the aggregate recycling facility will be subject to treatment in accordance with our bespoke permit which is currently restricted to sorting, separation, screening, crushing, washing and blending.

2.4.13 Due to the nature of waste treatment activities that are authorised at the aggregate recycling facility, it is considered that the waste will not be chemically altered. As such, it is considered that there is no benefit to undertaking basic characterisation and/or compliance testing for the residual waste prior to transfer to the landfill site.

2.4.14 Nevertheless, the waste will be subject to verification testing in accordance with the 'Duty of Care' testing programme which requires approximately 1 in 200 loads are WAC tested.

3.0 Emissions Control

3.1 Point Source Emissions to Air

3.1.1 There will be no point source emissions to air as a result of this application.

3.2 Point Source Emissions to Groundwater

3.2.1 There will be no point source emissions to groundwater as a result of this application.

3.3 Point Source Emissions to Surface Water and Sewers

3.3.1 There will be no point source emissions to surface water or sewer as a result of this application.

3.4 Fugitive Emissions

3.4.1 Fugitive emissions have been identified as a potential environmental risk resulting from the proposal, as detailed in the Environmental Risk Assessment that accompanies this application.

4.0 Accident Management

4.0.1 As part of the landfill operation, all necessary measures are to be taken to prevent the occurrence of accidents. The types of accidents and the potential environmental consequences associated with the work have been identified in the Environmental Risk Assessment that accompanies this application

4.0.2 It is considered that the most significant risk associated with the site is the unauthorised acceptance of non-compliant waste types. The waste acceptance procedures listed in Section 2 of this document aim to control and minimise this risk.

4.1 Fire Control

4.1.1 Fires from the acceptance of inert waste are considered unlikely due to the nature of the waste material. However, the operation and/or maintenance of mobile plant do pose a potential fire hazard, if precautions are not taken.

4.1.2 Firefighting equipment of a suitable type shall be kept at appropriate locations as advised by the Health and Safety Director or the local Fire Service. Where appropriate, mobile plant will be fitted with firefighting equipment. All firefighting equipment shall be kept in good condition, unobstructed and be serviced at least once a year by a competent person. The site will be designated as a "no smoking area" and signed accordingly.

4.1.3 Any fire on the site will be treated as an emergency and will be extinguished at the earliest opportunity. If necessary, the Fire Service will be summoned. Any incidents of fire will be reported to the Environment Agency and recorded in the Site Diary.

4.2 Spillage Procedure

4.2.1 Material accepted at the site will be inert. The most likely source for spillages will be from spillages of fuel or oil associated with plant and machinery.

4.2.2 In the event of a spillage of fuel/oil from site machinery or vehicles, the following procedures will be implemented:-

- Clear the area straight away;
- Lay absorbent granules over the spill to soak up the spillage;
- Use Personal Protective Equipment (PPE) provided on site if required;

- Once the liquid has all been absorbed use a shovel to clear up the waste, put it in a plastic sack and then place it in the container for non-compliant waste for disposal at a suitably permitted facility; and
- A record of the spill incident and remedial action taken will be recorded in the Site Diary.

4.2.3 Spillage kits will be maintained on site in order to respond to any spillage incident. The spillage kits will be kept securely on site.

4.3 Maintenance Procedures

4.3.1 A Planned Preventative Maintenance programme (PPM) is in place to minimise the risk to safety, health and the environment by ensuring that all appropriate items and elements within the site are serviced and inspected on a regular basis or to the manufacturers' maintenance schedules.

4.3.2 Details of faults, breakdowns and repairs are documented and records are maintained at the site office. Faults and breakdowns will be investigated and the service schedule revised if necessary.

5.0 Site Management

5.1 Technical Competence

5.1.1 The site is to be managed by an individual who possesses the required level of technical competence.

5.1.2 In terms of this application, it is considered that the required level of technical competence will not be affected as the competent person is the holder of a WAMITAB qualification Level 4 for non-hazardous waste codes. As such, it is proposed that Dde (SW) Ltd will continue to operate in accordance with their current arrangements which are approved by the Environment Agency.

5.2 Management System

5.2.1 The Dorton Group, of which Dde (SW) Ltd is a part, has an accredited environmental management system in place which is compliant with the requirements of ISO 14001.

5.2.2 All site operatives are adequately trained in health, safety and environmental issues. Staff are only be permitted to undertake activities that they have been trained for. They are also made aware of the procedures they must follow in the event of an accident or incident and will be able to access any relevant documentation that they may require. All training, experience and qualifications of staff is currently noted and these records are maintained and kept up to date.

6.0 Management of Documentation

6.1 Record Keeping

6.1.1 Dde (SW) Ltd have a Management System which is compliant with ISO 14001:2015 and this includes procedures for the management of documentation.

6.1.2 A record will be kept that provides details on all wastes deposited at the site. This will include details on waste types, quantities and the date of deposition. This will be provided to the Environment Agency at three-monthly intervals, within one month of the end of each period. A record of basic waste characterisation and any compliance testing or on-site verification will be maintained in the site office.

6.1.3 A site diary will be kept in the site office, and this will be updated daily. The diary will be used to record any accidents, incidents or complaints. This will provide an ongoing record throughout the period of operation at the site, and this will enable any investigative or corrective action that may be required.

6.1.4 The Environmental Permit and other documents containing information regarding the operation of the site will be kept in a convenient location, allowing access for any person that may be working at or visiting the site.

7.0 Incidents and Non-Conformances

7.0.1 Dde (SW) Ltd have procedures for investigating and recording any incidents and non-conformances at the site, and for taking any corrective action. Dde (SW) Ltd has an EMS which is compliant with ISO 14001 and this includes procedures for handling incidents and non-conformances.

7.0.2 The following types of incidents will require investigation: -

- Malfunction, breakdown or failure of plant and equipment;
- Deviation from site procedures and operating techniques;
- Near misses; and
- Complaints from external parties.

7.0.3 All staff are trained to detect and report any such occurrences. Procedures will be taken to allow operations to resume and preventative measures may be put in place to ensure that the incident does not reoccur.