

Permit with introductory note

The Environmental Permitting (England & Wales) Regulations 2016

Johnsons Aggregates and Recycling Limited

Saxon Brickworks
Whittlesey
Cambridgeshire
PE7 1PJ

Permit number

EPR/DP3131NM

Saxon Brickworks

Permit number EPR/DP3131NM

Introductory note

This introductory note does not form a part of the permit

The main features of the permit are as follows.

The environment permit allows Johnsons Aggregates and Recycling Limited to operate the following installation and directly associated activities (DAA) at the Saxon Brickworks site:

- S5.4 A(1) (b) (iii) - Recovery or a mix of recovery and disposal of non-hazardous waste with a capacity exceeding 75 tonnes per day involving treatment of slags and ashes.
- Storage of waste prior to and after treatment.
- Raw material storage.
- Collection and storage of contaminated and uncontaminated surface water.

Johnsons Aggregates and Recycling Limited is also allowed to operate the following Waste Operation activity:

- Storage and treatment of construction and demolition (C&D) waste.

The installation activity is for the treatment of Incinerator Bottom Ash (IBA) to produce Incinerator Bottom Ash Aggregate (IBAA) that has the potential to be a direct substitute for virgin aggregate. The treatment process involves removal of ferrous and non-ferrous metals, and screening of the IBA to produce different sized fractions of IBAA. Unprocessed IBA that is received at the site is stored outside to undergo a cooling and 'ageing' process for a maximum period of 12 weeks. The IBA is then processed using a combination of a trommel, vibrating screens, electrostatic and magnetic separators to remove ferrous and non-ferrous metals and to produce different sized fractions of IBAA. These processes are undertaken within two purpose-built and enclosed buildings. Other than the trommel, which is located outside, all of the IBA treatment plants are situated within the enclosed buildings.

In addition to the IBA treatment operations, the site is also permitted to treat C&D wastes by screening. The C&D wastes are first screened into sizes and then mixed with IBAA in line with the product specification for use of aggregate in construction agreed between the operator and their customers. The C&D waste treatment operations represent small percentage of the overall site's treatment capacity and is taking place outside of the buildings.

The facility is permitted to accept up to 250,000 tonnes of IBA and 50,000 of C&D wastes per year.

To prevent/minimise dust emission, the incoming waste is received and stored at a moisture content of 20%. The waste will be continually monitored and dampened down if there is a potential for dust emissions. Where dust emission is unavoidable, the proposal is to use enclosed/sealed conveyor belts and treatment plants, water cannons, misting/fogging units, regular cleaning of roads and clearing of mud and spillages, bowsers with spraying units to control dust emissions/impact and to capture any emissions from the dust extraction units.

Whilst noise emissions are likely from the site's operations, the operator submitted a detailed Noise Impact Assessment (NIA) which considers the potential risk of noise emissions on human receptors. The results of the NIA show that there is no significant impact as a result of the site's operations. The operator submitted a list of appropriate measures that will be deployed to prevent and mitigate noise impact. Some of these include: treatment of a large proportion of the waste inside an enclosed building, minimising drop heights, limited movement of waste during handling, no idling policy for vehicles at the site, and acoustic dampening on the hoppers and screeners.

There is no direct or indirect discharge of effluent from the site to any of the water bodies around the site. The treatment and storage areas are impermeable with sealed drainage system to retain and prevent

discharges of contaminated effluent from the site. Surface waters from the waste handling areas will pass through the lowest points of the impermeable surface and are captured in two wedge-pits that are located at the north eastern and south western corners of the site. The captured surface waters are treated and reused at the site.

There are habitat and Sites of Special Scientific Interest (SSSI) sites that are located with screening distance to the site. The closest of these sites is located approximately 1100 metres from the facility. We have considered that the risk of impact from this facility on the habitat and SSSI sites is low given the distance and the proposed operating procedures.

With regards to dust emission, the treatment operations is not expected to result in any significant dust impact that can lead to smothering.

The operator has an Environmental Management System which is compliant with ISO 14001 certification.

The status log of the permit sets out the permitting history, including any changes to the permit reference number.

Status log of the permit		
Description	Date	Comments
Application EPR/DP3131NM/A001	Duly made 15/01/21	Application for IBA and C&D wastes treatment facility.
Response to the Schedule 5 Notice dated 06/05/2021	20/05/21	Emails containing response to questions 1 - 50 of the Notice, including amended site and work area maps, layout plan for building 1, equipment drawings, phase II geo-environmental assessment report, site condition report, flood risk assessment – addendum, stock control procedure, dust and odour management plans, air quality environmental impact assessment, ecological survey update, list of waste table, process map and noise impact assessment (NIA) Rev B.
	24/05/21	Email containing the updated version of the dust and odour management plans.
	21/06/21	Email containing updated ecological appraisal report.
	24/06/21	Emails containing amended response to questions 2, 3, 7, 10-13, 19, 32-34, 38, 39, 44, 46, 47, 49 and 50 of the Schedule 5 Notice, amended NIA Rev C and amended list of waste table.
	12/08/21	Email containing updated NIA rev. F.
Response to the Schedule 5 Notice dated 29/07/2021	27/08/21	Email containing amended site location and layout plans, response to questions 1, 2, 4, 6, 8, 9, 12 – 17, 19, 29 – 31, 33, 34, 36, 37, 43, 44, 46, 47, 49 and 50 of the Schedule 5 Notice, risk assessment for dust, amended dust and odour management plans.
Response to the Schedule 5 Notice dated 24/09/2021	08/10/21	Email containing response to questions 1, 2, 4, 6, 8, 9, 12 - 15, 17, 19, 29 - 31, 34, 37, 44, 46, 47 and 49 of the Schedule 5 Notice, including amended dust management plan, approved odour management plan, amended site location and layout plans, list of waste, surface water storage volume map, surface water drainage strategy rev. F, flood risk assessment addendum, flood evacuation plan, wedge-pit details and reinforcement and micron fog brochure.
Additional information	14/10/21	Email containing updated NIA rev. G.

Status log of the permit		
Description	Date	Comments
	15/10/21	Email containing updated site layout plan rev. P05 and surface water level and drainage strategy.
	04/11/21	Email containing updated dust management plan, amended response to questions 1, 2, 4, 6, 8, 9, 13 - 15, 17, 19, 29, 31, 34, 37, 44, 46, 47 and 49 of the Schedule 5 Notices dated 29/07/2021 and 24/09/2021.
	09/11/21	Email containing an addendum to the NIA.
	14/12/21	Email containing amended response to questions 4, 6, 15, 17, 34 and 47 of the Schedule 5 Notice dated 24/09/2021 including the amended site layout plan (version P06, dated 19/08/2021), amended dust management plan and noise management plan.
	12/01/22	Email containing amended response to question 47 of the Schedule 5 Notice dated 24/09/2021 and the approved dust management plan (version 9, Issue 06 dated 11/12/2021).
Permit determined EPR/DP3131NM (PAS Billing ref. - DP3131NM, EAWML Billing ref. - EAWML 408217).	14/01/22	Permit issued to Johnsons Aggregates and Recycling Limited.

End of introductory note

Permit

The Environmental Permitting (England and Wales) Regulations 2016

Permit number

EPR/DP3131NM

The Environment Agency hereby authorises, under regulation 13 of the Environmental Permitting (England and Wales) Regulations 2016

Johnsons Aggregates and Recycling Limited (“the operator”),

whose registered office is

Johnsons Recycling Centre Crompton Road

Off Merlin Way

Ilkeston

Derbyshire

DE7 4BG

company registration number 04366658

to operate an installation and waste operations at

Saxon Brickworks

Whittlesey

Cambridgeshire

PE7 1PJ

to the extent authorised by and subject to the conditions of this permit.

Name	Date
Claire Roberts	14/01/2022

Authorised on behalf of the Environment Agency

Conditions

1 Management

1.1 General management

- 1.1.1 The operator shall manage and operate the activities:
- (a) in accordance with a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances, closure and those drawn to the attention of the operator as a result of complaints; and
 - (b) using sufficient competent persons and resources.
- 1.1.2 Records demonstrating compliance with condition 1.1.1 shall be maintained.
- 1.1.3 Any person having duties that are or may be affected by the matters set out in this permit shall have convenient access to a copy of it kept at or near the place where those duties are carried out.
- 1.1.4 The operator shall comply with the requirements of an approved competence scheme.

1.2 Energy efficiency

- 1.2.1 For the following activities referenced in schedule 1, table S1.1 (AR1 to AR7), the operator shall:
- (a) take appropriate measures to ensure that energy is used efficiently in the activities;
 - (b) review and record at least every four years whether there are suitable opportunities to improve the energy efficiency of the activities; and
 - (c) take any further appropriate measures identified by a review.

1.3 Efficient use of raw materials

- 1.3.1 For the following activities referenced in schedule 1, table S1.1 (AR1 to AR7), the operator shall:
- (a) take appropriate measures to ensure that raw materials and water are used efficiently in the activities;
 - (b) maintain records of raw materials and water used in the activities;
 - (c) review and record at least every four years whether there are suitable alternative materials that could reduce environmental impact or opportunities to improve the efficiency of raw material and water use; and
 - (d) take any further appropriate measures identified by a review.

1.4 Avoidance, recovery and disposal of wastes produced by the activities

- 1.4.1 The operator shall take appropriate measures to ensure that:
- (a) the waste hierarchy referred to in Article 4 of the Waste Framework Directive is applied to the generation of waste by the activities; and
 - (b) any waste generated by the activities is treated in accordance with the waste hierarchy referred to in Article 4 of the Waste Framework Directive; and
 - (c) where disposal is necessary, this is undertaken in a manner which minimises its impact on the environment.

- 1.4.2 The operator shall review and record at least every four years whether changes to those measures should be made and take any further appropriate measures identified by a review.

2 Operations

2.1 Permitted activities

- 2.1.1 The operator is only authorised to carry out the activities specified in schedule 1 table S1.1 (the “activities”).
- 2.1.2 Waste authorised by this permit shall be clearly distinguished from any other waste on the site.

2.2 The site

- 2.2.1 The activities shall not extend beyond the site, being the land shown edged in green on the site plan at schedule 7 to this permit.

2.3 Operating techniques

- 2.3.1 The activities shall, subject to the conditions of this permit, be operated using the techniques and in the manner described in the documentation specified in schedule 1, table S1.2, unless otherwise agreed in writing by the Environment Agency.
- 2.3.2 If notified by the Environment Agency that the activities are giving rise to pollution, the operator shall submit to the Environment Agency for approval within the period specified, a revision of any plan or other documentation (“plan”) specified in schedule 1, table S1.2 or otherwise required under this permit which identifies and minimises the risks of pollution relevant to that plan, and shall implement the approved revised plan in place of the original from the date of approval, unless otherwise agreed in writing by the Environment Agency.
- 2.3.3 Any raw materials or fuels listed in schedule 2 table S2.1 shall conform to the specifications set out in that table.
- 2.3.4 Waste shall only be accepted if:
- (a) it is of a type and quantity listed in schedule 2 tables S2.2 and S2.3; and
 - (b) it conforms to the description in the documentation supplied by the producer and holder.
- 2.3.5 The operator shall ensure that where waste produced by the activities is sent to a relevant waste operation, that operation is provided with the following information, prior to the receipt of the waste:
- (a) the nature of the process producing the waste;
 - (b) the composition of the waste;
 - (c) the handling requirements of the waste;
 - (d) the hazardous property associated with the waste, if applicable; and
 - (e) the waste code of the waste.
- 2.3.6 The operator shall ensure that where waste produced by the activities is sent to a landfill site, it meets the waste acceptance criteria for that landfill.

2.4 Improvement programme

- 2.4.1 The operator shall complete the improvements specified in schedule 1 table S1.3 by the date specified in that table unless otherwise agreed in writing by the Environment Agency.

- 2.4.2 Except in the case of an improvement which consists only of a submission to the Environment Agency, the operator shall notify the Environment Agency within 14 days of completion of each

2.5 Pre-operational conditions

- 2.5.1 The activities shall not be brought into operation until the measures specified in schedule 1 table S1.4 have been completed.

3 Emissions and monitoring

3.1 Emissions to water, air or land

- 3.1.1 There shall be no point source emissions to water, air or land.
- 3.1.2 Periodic monitoring shall be carried out at least once every 5 years for groundwater and 10 years for soil, unless such monitoring is based on a systematic appraisal of the risk of contamination.

3.2 Emissions of substances not controlled by emission limits

- 3.2.1 Emissions of substances not controlled by emission limits (excluding odour) shall not cause pollution. The operator shall not be taken to have breached this condition if appropriate measures, including, but not limited to, those specified in any approved emissions management plan, have been taken to prevent or where that is not practicable, to minimise, those emissions.
- 3.2.2 The operator shall:
- (a) if notified by the Environment Agency that the activities are giving rise to pollution, submit to the Environment Agency for approval within the period specified, an emissions management plan which identifies and minimises the risks of pollution from emissions of substances not controlled by emission limits;
 - (b) implement the approved emissions management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.
- 3.2.3 All liquids in containers, whose emission to water or land could cause pollution, shall be provided with secondary containment, unless the operator has used other appropriate measures to prevent or where that is not practicable, to minimise, leakage and spillage from the primary container.

3.3 Odour

- 3.3.1 Emissions from the activities shall be free from odour at levels likely to cause pollution outside the site, as perceived by an authorised officer of the Environment Agency, unless the operator has used appropriate measures, including, but not limited to, those specified in any approved odour management plan, to prevent or where that is not practicable to minimise the odour.

3.4 Noise and vibration

- 3.4.1 Emissions from the activities shall be free from noise and vibration at levels likely to cause pollution outside the site, as perceived by an authorised officer of the Environment Agency, unless the operator has used appropriate measures, including, but not limited to, those specified in any approved noise and vibration management plan to prevent or where that is not practicable to minimise the noise and vibration.
- 3.4.2 The operator shall:
- (a) if notified by the Environment Agency that the activities are giving rise to pollution outside the site due to noise and vibration, submit to the Environment Agency for approval within the period

specified, a noise and vibration management plan which identifies and minimises the risks of pollution from noise and vibration;

- (b) implement the approved noise and vibration management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.

3.5 Monitoring

3.5.1 The operator shall, unless otherwise agreed in writing by the Environment Agency, undertake the monitoring specified in the following tables in schedule 3 to this permit:

- (a) ambient air monitoring specified in table S3.1; and
- (b) process monitoring specified in table S3.2.

3.5.2 The operator shall maintain records of all monitoring required by this permit including records of the taking and analysis of samples, instrument measurements (periodic and continual), calibrations, examinations, tests and surveys and any assessment or evaluation made on the basis of such data.

3.5.3 Monitoring equipment, techniques, personnel and organisations employed for the emissions monitoring programme and the environmental or other monitoring specified in condition 3.5.1 shall have either MCERTS certification or MCERTS accreditation (as appropriate), where available, unless otherwise agreed in writing by the Environment Agency.

4 Information

4.1 Records

4.1.1 All records required to be made by this permit shall:

- (a) be legible;
- (b) be made as soon as reasonably practicable;
- (c) if amended, be amended in such a way that the original and any subsequent amendments remain legible, or are capable of retrieval; and
- (d) be retained, unless otherwise agreed in writing by the Environment Agency, for at least 6 years from the date when the records were made, or in the case of the following records until permit surrender:
 - (i) off-site environmental effects; and
 - (ii) matters which affect the condition of the land and groundwater.

4.1.2 The operator shall keep on site all records, plans and the management system required to be maintained by this permit, unless otherwise agreed in writing by the Environment Agency.

4.2 Reporting

4.2.1 The operator shall send all reports and notifications required by the permit to the Environment Agency using the contact details supplied in writing by the Environment Agency.

4.2.2 For the following activities referenced in schedule 1, table S1.1 (AR1 to AR7), a report or reports on the performance of the activities over the previous year shall be submitted to the Environment Agency by 31 January (or other date agreed in writing by the Environment Agency) each year. The report(s) shall include as a minimum:

- (a) a review of the results of the monitoring and assessment carried out in accordance with the permit including an interpretive review of that data;
- (b) the annual production/treatment data set out in schedule 4 table S4.2; and

- (c) the performance parameters set out in schedule 4 table S4.3 using the forms specified in table S4.4 of that schedule.

4.2.3 Within 28 days of the end of the reporting period the operator shall, unless otherwise agreed in writing by the Environment Agency, submit reports of the monitoring and assessment carried out in accordance with the conditions of this permit, as follows:

- (a) in respect of the parameters and emission points specified in schedule 4 table S4.1;
- (b) for the reporting periods specified in schedule 4 table S4.1 and using the forms specified in schedule 4 table S4.4; and
- (c) giving the information from such results and assessments as may be required by the forms specified in those tables.

4.2.4 The operator shall, unless notice under this condition has been served within the preceding four years, submit to the Environment Agency, within six months of receipt of a written notice, a report assessing whether there are other appropriate measures that could be taken to prevent, or where that is not practicable, to minimise pollution.

4.2.5 Within 1 month of the end of each quarter, the operator shall submit to the Environment Agency using the form made available for the purpose, the information specified on the form relating to the site and the waste accepted and removed from it during the previous quarter.

4.3 Notifications

4.3.1 In the event:

- (a) that the operation of the activities gives rise to an incident or accident which significantly affects or may significantly affect the environment, the operator must immediately—
 - (i) inform the Environment Agency,
 - (ii) take the measures necessary to limit the environmental consequences of such an incident or accident, and
 - (iii) take the measures necessary to prevent further possible incidents or accidents;
- (b) of a breach of any permit condition the operator must immediately—
 - (i) inform the Environment Agency, and
 - (ii) take the measures necessary to ensure that compliance is restored within the shortest possible time;
- (c) of a breach of permit condition which poses an immediate danger to human health or threatens to cause an immediate significant adverse effect on the environment, the operator must immediately suspend the operation of the activities or the relevant part of it until compliance with the permit conditions has been restored.

4.3.2 Any information provided under condition 4.3.1 shall be confirmed by sending the information listed in schedule 5 to this permit within the time period specified in that schedule.

4.3.3 Where the Environment Agency has requested in writing that it shall be notified when the operator is to undertake monitoring and/or spot sampling, the operator shall inform the Environment Agency when the relevant monitoring and/or spot sampling is to take place. The operator shall provide this information to the Environment Agency at least 14 days before the date the monitoring is to be undertaken.

4.3.4 The Environment Agency shall be notified within 14 days of the occurrence of the following matters, except where such disclosure is prohibited by Stock Exchange rules:

Where the operator is a registered company:

- (a) any change in the operator's trading name, registered name or registered office address; and

- (b) any steps taken with a view to the operator going into administration, entering into a company voluntary arrangement or being wound up.

Where the operator is a corporate body other than a registered company:

- (a) any change in the operator's name or address; and
- (b) any steps taken with a view to the dissolution of the operator.

In any other case:

- (a) the death of any of the named operators (where the operator consists of more than one named individual);
- (b) any change in the operator's name(s) or address(es); and
- (c) any steps taken with a view to the operator, or any one of them, going into bankruptcy, entering into a composition or arrangement with creditors, or, in the case of them being in a partnership, dissolving the partnership.

4.3.5 Where the operator proposes to make a change in the nature or functioning, or an extension of the activities, which may have consequences for the environment and the change is not otherwise the subject of an application for approval under the Regulations or this permit:

- (a) the Environment Agency shall be notified at least 14 days before making the change; and
- (b) the notification shall contain a description of the proposed change in operation.

4.3.6 The Environment Agency shall be given at least 14 days' notice before implementation of any part of the site closure plan.

4.4 Interpretation

4.4.1 In this permit the expressions listed in schedule 6 shall have the meaning given in that schedule.

4.4.2 In this permit references to reports and notifications mean written reports and notifications, except where reference is made to notification being made "immediately", in which case it may be provided by telephone.

Schedule 1 – Operations

Table S1.1 activities			
Activity reference	Activity listed in Schedule 1 of the EP Regulations	Description of specified activity and WFD Annex I and II operations	Limits of specified activity and waste types
A1	S5.4 A(1) (b) (iii) Recovery or a mix of recovery and disposal of non-hazardous waste with a capacity exceeding 75 tonnes per day involving treatment of slags and ashes.	R4: Recycling/reclamation of metals and metal compounds R5: Recycling/reclamation of other inorganic materials	From receipt of permitted waste through to treatment and recovery of the by-product (IBAA). Treatment of IBA in an enclosed building/enclosure using a combination of a trommel, vibrating screens, electrostatic and magnetic separators. Treatment shall take place on an impermeable surface with sealed drainage. The daily treatment capacity is limited to 1000 tonnes per day. Waste types as specified in Table S2.2.
Directly Associated Activity			
AR2	Storage of IBA waste prior to treatment	R13: Storage of waste pending the operations numbered R1, R4 and R5 (excluding temporary storage, pending collection, on the site where it is produced)	From receipt of waste to its recovery. Storage shall take place on an impermeable surface with sealed drainage system. The maximum height of stockpiles is limited to 4.6m. The maximum quantity of IBA stored at any one time prior to treatment is limited to 52,000 tonnes. Waste types as specified in Table S2.2.
AR3	Storage of wastes recovered from the IBA treatment processes	R13: Storage of waste pending the operations numbered R1, R4 and R5 (excluding temporary storage, pending collection, on the site where it is produced)	From recovery of waste/by-product to despatch off-site for use. Storage of processed IBAA, ferrous and non-ferrous metals after treatment. The maximum height of stockpiles is limited to 4.6m. The maximum quantity of IBAA, ferrous/non-ferrous stored at any one time after treatment is limited to 38,304 and 1786 tonnes respectively. Storage shall take place on an impermeable surface with sealed drainage system.

Table S1.1 activities			
Activity reference	Activity listed in Schedule 1 of the EP Regulations	Description of specified activity and WFD Annex I and II operations	Limits of specified activity and waste types
AR4	N/A	Storage of raw materials	From the receipt of raw materials to despatch for use within the facility. Raw materials as specified in Table S2.1.
AR5		Abatement systems - operation of dust filtration units in building 2	Captured dust/particulates to be fully contained. There shall be no venting or release of dust from the abatement units to the atmosphere.
AR6	N/A	Uncontaminated roof water collection and storage	Collection and storage of uncontaminated roof and site surface water in tanks. From collection of uncontaminated roof water to re-use within the facility.
AR7	N/A	Collection and storage of contaminated surface water	From the collection of waste water produced at the facility to re-use within the facility or despatch off-site for recovery or disposal. Contaminated surface water runoff and process water/effluent collected from waste storage and treatment areas shall be stored temporarily in the wedge-pits or above-ground tanks prior to reuse or despatch off-site.
Activity reference	Description of activities for waste operations		Limits of activities
AR8	<p>R13: Storage of waste pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced)</p> <p>R4: Recycling/reclamation of metals and metal compounds</p> <p>R5: Recycling/reclamation of other inorganic compounds</p>		<p>From receipt of waste to despatch off-site for use its recovery.</p> <p>Treatment operations shall be limited to screening for the purpose of recovery.</p> <p>Mixing of the treated C&D waste with IBAA and virgin aggregate in line with the product specifications.</p> <p>The maximum height of stockpiles is limited to 4.6m.</p> <p>The maximum quantity of C&D waste stored at any one time is limited to 7373 tonnes.</p> <p>Storage and treatment shall take place on an impermeable surface with sealed drainage system.</p> <p>Waste types as specified in Table 2.3.</p>

Table S1.2 Operating techniques		
Description	Parts	Date Received
Application	Application document(s) provided in response to section 3a – technical standards, Part B3 and B4 of the application form, including: <ul style="list-style-type: none"> ▪ Waste Acceptance Procedure ▪ Accident Management Plan ▪ Vibration Management Plan ▪ Flood Action Plan. 	Duly Made 15/01/21
Response to the Schedule 5 Notice dated 06/05/2021	Response to questions 5, 10, 18, 32, 35, 40 – 42, 45 and 48 of the Notice, including stock control procedure.	20/05/21
	Response to questions 3, 7, 11, 38 and 39 of the Schedule 5 Notice.	24/06/21
Response to the Schedule 5 Notice dated 29/07/2021	Response to questions 16, 33, 36, 43 and 50 of the Schedule 5 Notice.	27/08/21
Response to the Schedule 5 Notice dated 24/09/2021	Response to questions 1, 2, 8, 9, 12, 14, 30, 31, 44 and 46 of the Schedule 5 Notice, including amended site location plan, approved Odour Management Plan (Version 5, Issue 04, dated 08/10/2021), Flood Evacuation Plan, wedge-pit details and reinforcement.	08/10/21
Additional information	Updated Surface Water Level and Drainage Strategy.	15/10/21
	Response to questions 13, 19, 29, 37 and 49 of the Schedule 5 Notices dated 29/07/2021 and 24/09/2021.	04/11/21
	Response to questions 4, 6, 15, 17, 34 and 47 of the Schedule 5 Notices dated 24/09/2021 including the amended layout plan (version P06, dated 19/08/2021).	14/12/21
	Response to question 47 of the Schedule 5 Notices dated 24/09/2021 and the approved Dust Management Plan (version 9, Issue 06 dated 11/12/2021).	12/01/22

Table S1.3 Improvement programme requirements		
Reference	Requirement	Date
IC1	The operator shall undertake continuous monitoring of particulate matter in ambient air following full commissioning of the permitted site operations for a period of 6 months. The monitoring shall be undertaken in accordance with the approved Dust Management Plan for the site, the Environment Agency Technical Guidance Note (Monitoring) M8 – Monitoring of Ambient Air and M17 – Monitoring Particulate Matter in Ambient Air around Waste Facilities.	13/08/22
IC2	Following the completion of IC1, the operator shall submit a report of the monitoring of particulate matter in ambient air to the Environment Agency for written approval. Where the report shows that dust emission is occurring beyond the site boundary and/or is having an impact at the sensitive receptor locations, the operator shall submit a proposal for mitigation of the impact of particulate matter arising from the site's operations. The proposal shall take into account appropriate measures for reduction of particulate matter as specified in the <u>Non-hazardous and inert waste: appropriate measures for permitted facilities</u> and Environment Agency's Technical Guidance 384_12 – Storing and treating incinerator bottom ash. The proposal shall include timescales for implementation.	13/10/22

Table S1.3 Improvement programme requirements		
Reference	Requirement	Date
	The operator shall carry out mitigation in accordance with the timescale agreed with the Environment Agency.	
IC3	<p>The operator shall undertake noise monitoring in line with BS4142:2014+A1:2019 to validate the data that is used in the Noise Impact Assessment submitted with the application EPR/DP3131NM/A001.</p> <p>Following the review of the noise data, the operator shall submit a revised Noise Impact Assessment report which reviews the effectiveness of the site's noise management plan to the Environment Agency for written approval.</p> <p>In the event that the noise monitoring identifies the need for noise abatement measures, the operator shall submit a proposal for additional mitigation measures together with timescales for implementation to the Environment Agency for written approval.</p> <p>The operator shall implement the approved mitigation measures in according with the timescales agreed with the Environment Agency.</p>	13/08/22
IC4	Following the completion of the monitoring required under IC4, the operator shall review and submit updated Noise Management Plan to the Environment Agency for written approval.	13/10/22

Table S1.4 Pre-operational measures	
Reference	Pre-operational measures
PO1	<p>Prior to the commencement of the waste storage and treatment operations authorised in this permit, the operator shall submit information on the design and construction specifications of the buildings, impermeable concrete surfacing and associated drainage infrastructure including the wedge-pits, above-ground storage tanks, sump, connecting pipelines and secondary containment and perimeter 'Lego' block walls to the Environment Agency for approval.</p> <p>The construction of the concrete surfacing and associated drainage infrastructure including wedge-pits, tanks, pipelines, sump and secondary containment and perimeter Lego block walls shall meet the requirements of the BAT standards and appropriate measures outlined in the <u>Non-hazardous and inert waste: appropriate measures for permitted facilities</u> and CIRIA report C736.</p> <p>The operator shall also submit a construction quality assurance (CQA) validation report confirming that the impermeable concrete surfacing and associated infrastructure and perimeter Lego block walls were constructed in accordance with the detailed design and signed off by an appropriately qualified person.</p> <p>The operator shall not commence waste storage and/or treatment operations at the site until the CQA validation report is approved by the Environment Agency.</p>
PO2	<p>Prior to the commencement of waste acceptance, storage and/or treatment operations authorised in this permit, the operator shall submit a report on the baseline conditions of soil and groundwater to the Environment Agency for approval.</p> <p>The report shall contain the information necessary to determine the state of soil and groundwater contamination so as to make a quantified comparison with the state upon definitive cessation of activities. The report shall contain information, supplementary to that already provided in the application and should be in accordance with the H5 guidance.</p>

Schedule 2 – Waste types, raw materials and fuels

Raw materials and fuel description	Specification
Fuel, lubricating grease and hydraulic oil	-
Virgin aggregates	-

Maximum quantity	The total quantity of waste accepted at the site under the IBA treatment and storage activities shall not exceed 250,000 tonnes per year.
Exclusions	Odorous waste
Waste code	Description
19	Wastes from waste management facilities, off-site waste water treatment plants and the preparation of water intended for human consumption and water for industrial use
19 01	wastes from incineration or pyrolysis of waste
19 01 12	bottom ash and slag other than those mentioned in 19 01 11

Maximum quantity	The total quantity of waste accepted at the site under the IBA treatment and storage activities shall not exceed 50,000 tonnes per year.
Exclusions	Odorous waste
Waste code	Description
17	Construction and demolition wastes (including excavated soil from contaminated sites)
17 01	concrete, bricks, tiles and ceramics
17 01 07	mixtures of concrete, bricks, tiles and ceramics other than those mentioned in 17 01 06
17 03	bituminous mixtures, coal tar and tarred products
17 03 02	bituminous mixtures other than those mentioned in 17 03 01 (road planning)
17 05	soil (including excavated soil from contaminated sites), stones and dredging spoil
17 05 04	soil and stones other than those mentioned in 17 05 03
17 05 08	track ballast other than those mentioned in 17 05 07
17 09	other construction and demolition wastes
17 09 04	mixed construction and demolition wastes, other than those mentioned in 17 09 01, 17 09 02 and 17 09 03

Schedule 3 – Emissions and monitoring

Table S3.1 Ambient air monitoring requirements				
Location or description of point of measurement	Parameter	Monitoring frequency	Monitoring standard or method	Other specifications
At the emissions monitoring stations marked 5 and 14 on the site layout plan (drawing number C3234-600, revision P06, dated 19/08/2021)	Dust	Continuous	In line with M17 monitoring guidance	Use directional dust deposit gauge. Contents of deposit gauge to be measured weekly. Trigger level of 75µg/m ³ and action level 25µg/m ³ (specified in the Dust Management Plan).
At the emissions monitoring points shown on the site layout plan (drawing number C3234-600, revision P06, dated 19/08/2021)		Daily		

Table S3.2 Process monitoring requirements				
Emission point reference or source or description of point of measurement	Parameter	Monitoring frequency	Monitoring standard or method	Other specifications
At the IBA, IBAA and C&D waste stockpiles shown on the site layout plan (drawing number C3234-600, revision P06, dated 19/08/2021)	Moisture content	Daily	Moisture meter	Not applicable

Schedule 4 – Reporting

Parameters, for which reports shall be made, in accordance with conditions of this permit, are listed below.

Table S4.1 Reporting of monitoring data			
Parameter	Emission or monitoring point/reference	Reporting period	Period begins
Ambient air monitoring Parameters as required by condition 3.5.	At the fugitive emissions monitoring stations/ points	Every 6 months	1 January, 1 July
Process monitoring Parameters as required by condition 3.5.	At the IBA, IBAA and C&D waste stockpiles	Every 6 months	1 January, 1 July

Table S4.2 Annual production/treatment	
Parameter	Units
IBA waste treated	tonnes
C&D waste treated	tonnes
IBAA produced	tonnes

Table S4.3 Performance parameters		
Parameter	Frequency of assessment	Units
Water usage	Annually	m ³
Energy usage	Annually	MWh
Total raw material used	Annually	tonnes

Table S4.4 Reporting forms		
Parameter	Reporting form	Form version number and date
Ambient air monitoring	Ambient Air Monitoring Form, or other form as agreed in writing by the Environment Agency	Version 1, 08/03/2021
Process monitoring	Process Monitoring Form, or other form as agreed in writing by the Environment Agency	Version 1, 08/03/2021
Water usage	Water Usage Reporting Form, or other form as agreed in writing by the Environment Agency	Version 1, 08/03/2021
Energy usage	Energy Usage Reporting Form, or other form as agreed in writing by the Environment Agency	Version 1, 08/03/2021
Other performance parameters	Other Performance Parameters Reporting Form, or other form as agreed in writing by the Environment Agency	Version 1, 08/03/2021

Schedule 5 – Notification

These pages outline the information that the operator must provide.

Units of measurement used in information supplied under Part A and B requirements shall be appropriate to the circumstances of the emission. Where appropriate, a comparison should be made of actual emissions and authorised emission limits.

If any information is considered commercially confidential, it should be separated from non-confidential information, supplied on a separate sheet and accompanied by an application for commercial confidentiality under the provisions of the EP Regulations.

Part A

Permit Number	
Name of operator	
Location of Facility	
Time and date of the detection	

(a) Notification requirements for any malfunction, breakdown or failure of equipment or techniques, accident, or emission of a substance not controlled by an emission limit which has caused, is causing or may cause significant pollution	
To be notified within 24 hours of detection	
Date and time of the event	
Reference or description of the location of the event	
Description of where any release into the environment took place	
Substances(s) potentially released	
Best estimate of the quantity or rate of release of substances	
Measures taken, or intended to be taken, to stop any emission	
Description of the failure or accident.	

(b) Notification requirements for the breach of a limit	
To be notified within 24 hours of detection unless otherwise specified below	
Emission point reference/ source	
Parameter(s)	
Limit	
Measured value and uncertainty	
Date and time of monitoring	

(b) Notification requirements for the breach of a limit	
To be notified within 24 hours of detection unless otherwise specified below	
Measures taken, or intended to be taken, to stop the emission	

Time periods for notification following detection of a breach of a limit	
Parameter	Notification period

(c) Notification requirements for the breach of permit conditions not related to limits	
To be notified within 24 hours of detection	
Condition breached	
Date, time and duration of breach	
Details of the permit breach i.e. what happened including impacts observed.	
Measures taken, or intended to be taken, to restore permit compliance.	

(d) Notification requirements for the detection of any significant adverse environmental effect	
To be notified within 24 hours of detection	
Description of where the effect on the environment was detected	
Substances(s) detected	
Concentrations of substances detected	
Date of monitoring/sampling	

Part B – to be submitted as soon as practicable

Any more accurate information on the matters for notification under Part A.	
Measures taken, or intended to be taken, to prevent a recurrence of the incident	

Measures taken, or intended to be taken, to rectify, limit or prevent any pollution of the environment which has been or may be caused by the emission	
The dates of any unauthorised emissions from the facility in the preceding 24 months.	

Name*	
Post	
Signature	
Date	

* authorised to sign on behalf of the operator

Schedule 6 – Interpretation

“accident” means an accident that may result in pollution.

“application” means the application for this permit, together with any additional information supplied by the operator as part of the application and any response to a notice served under Schedule 5 to the EP Regulations.

“authorised officer” means any person authorised by the Environment Agency under section 108(1) of The Environment Act 1995 to exercise, in accordance with the terms of any such authorisation, any power specified in section 108(4) of that Act.

“bottom ash” means ash falling through the grate transported by the grate.

“building” means a construction that has the objective of providing sheltering cover and minimising emissions of noise, particulate matter, odour and litter.

“emissions of substances not controlled by emission limits” means emissions of substances to air, water or land from the activities, either from the emission points specified in schedule 3 or from other localised or diffuse sources, which are not controlled by an emission limit.

“emissions to land” includes emissions to groundwater.

“EP Regulations” means The Environmental Permitting (England and Wales) Regulations SI 2016 No.1154 and words and expressions used in this permit which are also used in the Regulations have the same meanings as in those Regulations.

“groundwater” means all water, which is below the surface of the ground in the saturation zone and in direct contact with the ground or subsoil.

“Industrial Emissions Directive” means DIRECTIVE 2010/75/EU OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 24 November 2010 on industrial emissions, as read in accordance with Schedule 1A to the Environmental Permitting (England and Wales) Regulations 2016.

“List of Wastes” means the list of wastes established by Commission Decision 2000/532/EC replacing Decision 94/3/EC establishing a list of wastes pursuant to Article 1(a) of Council Directive 75/442/EEC on waste and Council Decision 94/904/EC establishing a list of hazardous waste pursuant to Article 1(4) of Council Directive 91/689/EEC on hazardous waste.

“MCERTS” means the Environment Agency’s Monitoring Certification Scheme.

“quarter” means a calendar year quarter commencing on 1 January, 1 April, 1 July or 1 October.

“recovery” means any of the operations provided for in Annex II to the Waste Framework Directive.

“Waste code” means the six digit code referable to a type of waste in accordance with the List of Wastes and in relation to hazardous waste, includes the asterisk.

“Waste Framework Directive” or “WFD” means Waste Framework Directive 2008/98/EC of the European Parliament and of the Council on waste, as read in accordance with Schedule 1A to the Environmental Permitting (England and Wales) Regulations 2016.

“year” means calendar year ending 31 December.

Schedule 7 – Site plan



©Crown Copyright. All rights reserved. Environment Agency, 100024198, 2022.

END OF PERMIT

Signed: *[Name]*

Date: *[DD/MM/YY]*

(Authorised to sign as representative of the operator)

Guidance for use: Use this form to report your monitoring results.

Example text is shown in bracketed grey italics. Replace the example text by entering your own site specific information. Complete columns 1 to 5 using the information from schedule 3 of your permit. Complete columns 6 to 8 with your monitoring data. Add additional rows as necessary.

- ¹ Where an internationally recognised standard test method is used, give the reference number. Where another method that has been formally agreed with the Environment Agency, give the appropriate identifier. In other cases state the principal technique, for example gas chromatography.
- ² Give the result as the maximum value (or the minimum value in the case of a limit that is expressed as a minimum) obtained during the reporting period, expressed in the same terms as the emission limit value. Where the emission limit value is expressed as a range, give the result as the 'minimum to maximum' of the measured values.
- ³ For non-continuous measurements give the date and time of the sample that produced the result. For continuous measurements give the percentage of the process operating time covered by the result.
- ⁴ Complete if the uncertainty associated with the result is not a 95% confidence interval. Leave blank for 95% confidence intervals.

Process Monitoring Form

Permit number: **EPR/DP3131NM**

Facility name: **Saxon Brickworks**

Operator: **Johnsons Aggregates and Recycling Limited**

Process Monitoring Form: **version 1, 08/03/2021**

Reporting of process monitoring for the period from *[DD/MM/YY]* to *[DD/MM/YY]*

Monitoring point description or source	Parameter	Reference period	Test method ¹	Result ²	Sample dates and times ³	Uncertainty ⁴
<i>[e.g. Condenser V 2345]</i>	<i>[e.g. cooling water outlet temperature]</i>	<i>[e.g. instantaneous]</i>	<i>[if applicable]</i>	<i>[State result]</i>	<i>[State relevant dates and time periods]</i>	<i>[if applicable]</i>

Operator's comments

--

Signed: *[Name]*

Date: *[DD/MM/YY]*

(Authorised to sign as representative of the operator)

Guidance for use: Use this form to report your monitoring results.

Example text is shown in bracketed grey italics. Replace the example text by entering your own site specific information. Complete columns 1 to 5 using the information from schedule 3 of your permit. Complete columns 6 to 8 with your monitoring data. Add additional rows as necessary.

- ¹ Where an internationally recognised standard test method is used, give the reference number. Where another method that has been formally agreed with the Environment Agency, give the appropriate identifier. In other cases state the principal technique, for example gas chromatography.
- ² Give the result as the maximum value (or the minimum value in the case of a limit that is expressed as a minimum) obtained during the reporting period, expressed in the same terms as the emission limit value. Where the emission limit value is expressed as a range, give the result as the 'minimum to maximum' of the measured values.
- ³ For non-continuous measurements give the date and time of the sample that produced the result. For continuous measurements give the percentage of the process operating time covered by the result.
- ⁴ Complete if the uncertainty associated with the result is not a 95% confidence interval. Leave blank for 95% confidence intervals.

Water Usage Reporting Form

Permit number: **EPR/DP3131NM**

Facility name: **Saxon Brickworks**

Operator: **Johnsons Aggregates and Recycling Limited**

Water Usage Reporting Form: **version 1, 08/03/2021**

Reporting of water usage for the year [YYYY]

Water source	Water usage (m³)	Specific water usage (m³/unit) ²
Mains water	<i>[insert annual usage in m³ where mains water is used]</i>	<i>[insert annual usage in m³/unit where mains water is used]</i>
Site borehole	<i>[insert annual usage in m³ where water is used from a site borehole]</i>	<i>[insert annual usage in m³/unit where water is used from a site borehole]</i>
River abstraction	<i>[insert annual usage in m³ where abstracted river water is used]</i>	<i>[insert annual usage in m³/unit where abstracted river water is used]</i>
Other – <i>[specify other water source where applicable. Add extra rows where needed]</i>	<i>[insert annual usage in m³ where applicable]</i>	<i>[insert annual usage in m³/unit where applicable]</i>
Total water usage	<i>[insert total annual water usage in m³]</i>	<i>[insert total annual water usage in m³/unit]</i>

Operator's comments

--

Signed: *[Name]*

Date: *[DD/MM/YY]*

(Authorised to sign as representative of the operator)

Guidance for use: Use this form to report your annual water usage.

Example text is shown in bracketed grey italics. Replace the example text by entering your own site specific information. Add additional rows as necessary.

Energy Usage Reporting Form

Permit number: EPR/DP3131NM

Operator: Johnsons Aggregates and Recycling Limited

Facility name: Saxon Brickworks

Energy Usage Reporting Form: version 1, 08/03/2021

Reporting of energy usage for the year [YYYY]

Energy source	Energy consumption / production (MWh)	Specific energy consumption (MWh/unit) ²
Electricity imported as delivered - source [specify source, e.g. supplied from the national grid]	<i>[insert annual consumption in MWh where electricity is imported]</i>	<i>[insert annual consumption in MWh/unit where electricity is imported]</i>
Electricity imported as primary energy 1 – conversion factor of [specify conversion factor used to convert electricity delivered to primary energy]	<i>[insert annual consumption in MWh where electricity is imported]</i>	<i>[insert annual consumption in MWh/unit where electricity is imported]</i>
Natural gas	<i>[insert annual consumption in MWh where natural gas is used]</i>	<i>[insert annual consumption in MWh/unit where natural gas is used]</i>
Gas oil – conversion factor of [specify conversion factor used to convert tonnes to MWh]	<i>[insert annual consumption in MWh where gas oil is used]</i>	<i>[insert annual consumption in MWh/unit where gas oil is used]</i>
Imported heat	<i>[insert annual consumption in MWh where heat is imported]</i>	<i>[insert annual consumption in MWh/unit where heat is imported]</i>
Other – <i>[specify other energy source and conversion factors where applicable, e.g. renewable fuel. Add extra rows where needed]</i>	<i>[insert annual consumption in MWh where applicable]</i>	<i>[insert annual consumption in MWh/unit where applicable]</i>
Electricity exported	<i>[insert annual production in MWh where electricity is exported]</i>	Not applicable
Heat exported	<i>[insert annual production in MWh where heat is exported]</i>	Not applicable

Operator's comments

Signed: *[Name]*

Date: *[DD/MM/YY]*

(Authorised to sign as representative of the operator)

Guidance for use: Use this form to report your annual energy usage.

Example text is shown in bracketed grey italics. Replace the example text by entering your own site specific information. Add additional rows as necessary.

¹ Multiply delivered electricity by 2.4 to convert to primary energy where the electricity is supplied from the national grid. If the electricity is supplied from another source, specify the conversion factor used. Add additional rows as needed if electricity is imported from multiple sources.

² Divide energy consumption by an appropriate unit of raw material processed or product output.

Other Performance Parameters Reporting Form

Permit number: **EPR/DP3131NM**

Operator: **Johnsons Aggregates and Recycling Limited**

Facility name: **Saxon Brickworks**

Other Performance Parameters Reporting Form: **version 1, 08/03/2021**

Reporting of other performance parameters for the period from *[DD/MM/YY]* to *[DD/MM/YY]*

Parameter	Units
<i>[e.g. Total raw material usage]</i>	<i>[e.g. tonnes per production unit]</i>

Operator's comments

Signed: *[Name]*

Date: *[DD/MM/YY]*

(Authorised to sign as representative of the operator)

Guidance for use: Use this form to report the performance parameters (other than water and energy) required by your permit. Example text is shown in bracketed grey italics. Replace the example text by entering your own site specific information. The parameters to report and units to be used can be found in the 'Performance parameters' table in schedule 4 of your permit. Add additional rows as necessary.