

Annex 3 - T4 Preparatory treatments, baling, sorting, shredding

Part 1: Specific issues and proposed changes

	Issue detail	Rationale for change	Proposed changes
Risks from stockpiling	Stockpiling of waste is a common issue on T4 sites and can lead to risks of abandonment and fire. Collected waste should be treated and either totally recovered or sent onto a final recovery site as soon as possible to ensure that it does not deteriorate to the point that recovery becomes more difficult.	Currently very high quantities especially as many of the wastes types are volumetrically high as very light e.g. plastics and food and drink cartons. Current acceptance limits in excess of those permitted by standard rules.	3 month storage to encourage turnover. Therefore reduced all storage limits to 100 m ³ for each waste type.
Risks from combustible wastes	The wastes have been identified as combustible and therefore vulnerable to the risk of fire	All combustible wastes should have the same controls as identified in the Fire Prevention Plan Guidance to reduce and control the risk from fire where that risk is the same as a permitted site.	3 month storage limit for combustible wastes to align with the FPP Guidance. Waste stacks and piles limited to 4m high. Storage quantities of 100 m ³ less than that of permitted sites and therefore not all the FPP requirements are needed.
Storage of multiple wastes increasing overall risk	T4 has a wide range of wastes that can be stored and treated at the moment there is no limit on the total amount of waste that can be stored.	Reduce overall storage and throughput quantities to an order or magnitude less than standard rules and bespoke permits. Encourages throughput and discourages stockpiling which is a fire-risk and often reduces the recoverability of waste as it deteriorates over time.	Individual storage limits in m ³ for all waste types. Total of 300 m ³ of any combination of the wastes on site at any one time.
Total yearly processing rates significantly in excess of even bespoke treatment permits	If the maximum 7-day processing capacity for all wastes was reached the site would be processing over 900,000 tonnes per year. Even individual limits for each waste are excessively high.	Multiple waste streams treated on the same site increase the risk of the exempt activity. Exempt activities should be of a lower risk than permitted operations and processing quantities should not be in excess of standard or bespoke permits e.g. The following allow only 5000t per year.	Decrease overall annual acceptance to 500 tonnes with individual acceptance limits for each waste type.

	Issue detail	Rationale for change	Proposed changes
	<p>Ranging between 5,200 – 260,000 tonnes per year.</p> <p>These are serious quantities which pose high risks of fire in particular and should be controlled through the permitting process and associated compliance assessment activities such as inspection.</p>	<ul style="list-style-type: none"> • SR2008No15 Materials recycling facility (no building) • SR2008No22 Materials recycling facility (no building) 	
Treatment activities	<p>Granulation not currently listed as a treatment.</p> <p>It's not clear whether densifying of waste through extrusion which produces heat is allowed.</p>	<p>Add granulation to the list of treatments as it does not increase the overall risk of the activity.</p> <p>Extrusion was not meant to be excluded from the current exemption.</p>	<p>Granulation added.</p> <p>Clarified when heat is permitted as part of the treatment process.</p>
Containment	<p>No sealed drainage to prevent contaminated effluent from waste entering controlled waters.</p> <p>Containment to prevent litter from paper and cardboard.</p>	<p>Standardising appropriate containment across exemptions.</p>	<p>Sealed drainage put in for wastes that could be contaminated with other substances particularly food and drink.</p> <p>Widened to include same containment measures for plastics, cans and foil and food and drink cartons.</p>
Changes to waste coding	<p>07 02 13 Food and drink cartons only.</p>	<p>This code refers to a process waste. This is a production process waste not a product that is waste. Food and drink cartons will all be Chapter 15 waste, even if arising from a production process.</p>	<p>Remove this code.</p>

Part 2: Option 2 proposal

T4 - Treatment of relevant waste by baling, sorting, shredding, pulverising, densifying, crushing, granulating or compacting it

All	Current conditions			Changes proposed under Option 2		
Specified activities	Treatment of relevant waste by baling, sorting, shredding, pulverising, densifying, crushing or compacting it. Associated storage. <ul style="list-style-type: none"> Where the treatment involves pulverising waste <ul style="list-style-type: none"> the total quantity of waste over any 7 day period does not exceed 5 tonnes. The treatment is carried out indoors. Where the treatment involves densifying of waste the treatment does not involve the application of heat. 			Treatment of relevant waste by baling, sorting, shredding, pulverising, <u>granulating</u> , densifying, crushing or compacting it. Associated storage. <ul style="list-style-type: none"> Where the treatment involves pulverising or granulating the waste <ul style="list-style-type: none"> the total quantity of waste over any 7 day period does not exceed 2 tonnes. The treatment is carried out indoors. Where the treatment involves densifying of waste the treatment does not involve the external application of heat. Heat produced as a by-product during the extrusion process is permitted. 		
General conditions applying to all wastes	<ul style="list-style-type: none"> Must be treated and stored in a secure place. The waste arrives at the place where the operation is carried out in an unmixed state The waste is stored and treated in an unmixed state. 			<ul style="list-style-type: none"> Must be treated and stored in a secure place. Storage up to 3 months in total before and after treatment (unless fully recovered and no longer waste). Max stack height 4m. The waste arrives at the place where the operation is carried out in an unmixed state Each waste type must be stored separately and not mixed together during any treatment. Where more than one waste type is accepted at the site the total of all wastes accepted at the site must not exceed 500 tonnes per year. Where more than one waste type is accepted at the site the total of all wastes stored at the site must not exceed 300 m³ (60-150 tonnes) at any one time. No individual pile or stack may exceed 100 m³. Each stack or where stored in a container each container must be accessible in case of fire. 		
Waste type	Waste codes	Annual acceptance) (tonnes) / 7-day limit	Storage limits and conditions	Waste codes	Annual acceptance (tonnes) / 7-day limit	Storage limits and conditions
Cans and foil only	15 01 04 20 01 40	100 tonnes per 7 day period (outdoors) (= 5,200 tonnes per year) 500 tonnes per 7 day period (indoors)(= 26,000 tonnes per year)	<ul style="list-style-type: none"> 12 months 500 tonnes 	15 01 04 20 01 40	100 tonnes (434 m ³) per year 2 tonnes per 7 day period	<ul style="list-style-type: none"> 3 months 100 m³ (23 tonnes) Packaging waste that has contained food or drink must be stored on sealed drainage Must be baled or in an enclosure designed and maintained to prevent the escape of litter stored outside.

All	Current conditions			Changes proposed under Option 2		
Food and drink cartons only	07 02 13 15 01 02 15 01 05	100 tonnes per 7 day period (outdoors) (= 5,200 tonnes per year) 3,000 tonnes per 7 day period (outdoors) (= 156,000 tonnes per year)	<ul style="list-style-type: none"> • 12 months • 500 tonnes 	07 02 13 15 01 02 15 01 05	100 tonnes (500 - 714 m ³) per year. 2 tonnes per 7 day period	<ul style="list-style-type: none"> • 3 months. • 100 m³ (14-22 tonnes) • Must be stored on sealed drainage. • When stored outside must be baled or in an enclosure designed and maintained to prevent the escape of litter stored outside.
Glass	15 01 07 16 01 20 17 02 02 19 12 05 20 01 02	5,000 tonnes per 7 day period (=260,000 tonnes per year)	<ul style="list-style-type: none"> • 12 months • 5,000 tonnes 	15 01 07 16 01 20 17 02 02 19 12 05 20 01 02	300 tonnes (352 – 909 m ³) per year 6 tonnes per 7 day period	<ul style="list-style-type: none"> • 3 months. • 100 m³ (33-85 tonnes). • Must be stored on sealed drainage.
Paper and cardboard (excluding food and drink cartons)	03 03 08 03 03 07 15 01 01 19 12 01 20 01 01	500 tonnes per 7 day period (outdoors) (= 26,000 tonnes per year) 3,000 tonnes per 7 day period (outdoors) (= 156,000 tonnes per year)	<ul style="list-style-type: none"> • 12 months • 15,000 tonnes • Up to 1,000 tonnes may be stored outdoors so long as it is stored in an enclosure designed and maintained to prevent the escape of litter. 	03 03 08 03 03 07 15 01 01 19 12 01 20 01 01	300 tonnes per year (333 – 1428 m ³) 6 tonnes per 7 day period	<ul style="list-style-type: none"> • 3 months. • 100 m³ (21 tonnes – 90 tonnes if 03 03 07). • Must be baled or in an enclosure designed and maintained to prevent the escape of litter if stored outside.
Plastic	02 01 04 07 02 13 12 01 05 15 01 02 16 01 19 17 02 03 20 01 39 19 12 04	100 tonnes per 7 day period (outdoors) (= 5,200 tonnes per year) 3,000 tonnes per 7 day period (indoors) (= 156,000 tonnes per year)	<ul style="list-style-type: none"> • 12 months • 500 tonnes 	02 01 04 07 02 13 12 01 05 15 01 02 16 01 19 17 02 03 20 01 39 19 12 04 – clean plastics only	100 tonnes (278 -715 m ³) 2 tonnes per 7 day period	<ul style="list-style-type: none"> • 3 months. • 100 m³ (14 -36 tonnes). • Packaging waste that has contained food or drink must be stored on sealed drainage. • Must be baled or in an enclosure designed and maintained to prevent the escape of litter if stored outside.

All	Current conditions			Changes proposed under Option 2		
Textiles and clothes - outdoors	04-02-22 15-01-09 19-12-08 20-01-10 20-01-11	1,000 tonnes per 7 day period (outdoors) (= 52,000 tonnes per year)	<ul style="list-style-type: none"> 12 months 1,000 tonnes 	04-02-22 15-01-09 19-12-08 20-01-10 20-01-11 ¹	500 tonnes (3,703-5,882 m ³) 10 tonnes per 7 day period	<ul style="list-style-type: none"> 3 months 400 m³ (68-108 tonnes).
Textiles and clothes - indoors	04-02-22 15-01-09 19-12-08 20-01-10 20-01-11	3,000 tonnes per 7 day period (indoors) = 156,000 tonnes per year	<ul style="list-style-type: none"> 12 months 1,000 tonnes 	04-02-22 15-01-09 19-12-08 20-01-10 20-01-11	100 tonnes per year 2 tonnes per 7 day period	<ul style="list-style-type: none"> 3 months. 100 m³ (17-27 tonnes).

¹ A crossed-through waste code indicates we are proposing not to keep it