

Application for deployment of mobile plant for standard rules SR2010No11 and bespoke activities



Environment
Agency

Guidance notes

Introduction

These guidance notes will help you complete form MPD1 for deployments where the operator holds a mobile plant permit referring to either of the following:

- Standard rules SR2010No11 – Mobile plant for treatment of waste to produce soil, soil substitutes and aggregate
- Bespoke permit for waste

The bespoke permits must be for an activity which is **not**:

- Land remediation
- Land spreading or reclamation
- Crushing of lamps

If you have a bespoke permit for one of the above activities, then you should complete the specific deployment form for that activity.

Before you can use your mobile plant permit (MPP) at a site, you must fill in a deployment form and send it to us, the Environment Agency, with any necessary additional information. Only once we have given its agreement in writing to this deployment form can the operations start at the site.

The operations agreed under the deployment form are valid for 12 months from the date of approval. If you wish to continue operations after the 12-month period you will need to submit a new deployment form together with any supporting information and the correct fee.

Once the terms of this deployment have been agreed in writing by us, they must be complied with. Amendments can be made to the details contained in this deployment form, but can only be acted upon if we have first agreed to the amendment in writing.

The agreed deployment form is part of your MPP and so operating in breach of the agreed form or any other rule of your MPP could lead to us taking enforcement action.

You may complete as many deployment forms as you wish. Your permit allows you to operate under one MPP on as many sites as there are deployment forms for, agreed in writing with us. Only the mobile treatment processes specified in your MPP can be carried out.

Note that waste operations, including mobile plant deployments, may require planning consent. We recommend that you seek advice from your local planning authority before carrying out any waste operation.

What do you need to do?

The information you provide in the deployment form will help us decide if your proposed deployment can comply with the rules of your permit. It is important that you complete the form correctly as it will help us deal with your application more quickly.

When you make the application, please make sure you:

1. Answer all the questions that apply to you. If any of the questions do not apply to you, please write 'Not applicable' and give a justification. If you leave anything out, we may need to contact you to ask you for the information and our decision may be delayed.
2. Allow for at least 25 working days from the time your notification is complete for us to make our assessment.

The application will be considered to be complete when all documentation has been sent and you have paid the correct fee.

If you carry out any operations without telling us and without written confirmation that the deployment is agreed, you will be in breach of your environmental permit and we may take enforcement action against you.

How much will it cost?

You can find out the charge by searching for 'Environment Agency charging scheme and guidance: environmental permits, licence and registration costs and fees' at www.gov.uk/environment-agency.

If you need help and advice

If you have any queries regarding the form or supporting documents, please phone us on the number below:

General Enquiries line on 03708 506 506 (Monday to Friday, 8am to 6pm)

Email: enquiries@environment-agency.gov.uk

Where to post your form and how to contact us

Post your deployment form, fee and any supporting documents to our office at the following address:

Environment Agency
Permitting and Support Centre
Quadrant Two
99 Parkway Avenue
Sheffield
S9 4WF

Or email: PSC@environment-agency.gov.uk

A Your organisation

A1 Your contact details

A1.1 Discussions before your application

If you have had any discussions with us concerning this deployment before the application was submitted, please give the reference or send details on a separate sheet.

A1.2 Contact details for this deployment application

Please provide details of the person who will be the contact for queries about the information in this deployment form. This could be the operator or a person acting on behalf of the operator such as a consultant. They should be able to answer queries about any of the

information in the form or additional information such as the risk assessments. We may also need to speak to them if any information or the fee is missing or incorrect. This will help us to ensure that the agreement of the deployment form is not unduly delayed.

A1.3 Please indicate your preferred method of correspondence.

Please provide information on how we should contact you if extra information is required in relation to your deployment application. We may need to send a written request to you during the course of our assessment; as such your preferred method of correspondence should provide us with the means to contact you as quickly as possible.

A2 Your permit details

A2.1 Permit under which this deployment is taking place

Please provide the permit number (EAWML number or EPR number) under which the deployment is being made. We cannot agree a deployment unless a relevant permit is in force.

A2.2 Name and address of permit holder (operator)

Please provide the name and the main address of the permit holder (operator) or the company, individual or organisation who is making the application. The details provided must match the current permit details held by the operator.

B Deployment details

B1 About the operating site

B1.1 Please provide the name and address of your site.

Please give an accurate address for the site where your treatment and storage activities are planned to take place. Provide also the 12-figure grid reference of the centre of the site. Information on how to get a grid reference is available at gridreferencefinder.com.

B1.2 Please attach detailed site plans to show areas of the land that will be used for your proposed storage and treatment operations.

Provide an accurate and detailed site plan (or plans) to show the areas of land where the proposed treatment and storage activities are planned to take place. You must give a unique reference number to the plan or plans so that when we agree to your deployment we can refer to the approved plans. You are required to give all the following information in your site plan – we cannot accurately assess your application without this information:

- **Operating site boundary** clearly outlined
- **Security and access arrangements** including additional details where alternative security, other than that specified in the permit is to be provided (for example, containerised unit and buried pipework) or where others are responsible for site security of a larger redevelopment scheme and you are relying on that security for your plant.
- **Location of waste materials that need some form of treatment**
- **Location of principal plant and equipment**
- **Process treatment and storage areas** including any buildings, bays and fixed tanks, quarantine areas, areas of hardstanding, areas of impermeable pavement and sealed drainage. Where it is not possible to draw these clearly, include text which confirms that all potentially polluting materials will be deposited, stored, treated or otherwise handled in an area of the site where an engineered containment and drainage system has been provided.
- **Drainage systems** for the operating site, including all interceptors, sumps, bunding and discharge points.
- **Proposed location of boundary monitoring points and pollution control units** for example, for noise, dust, odour and VOCs emissions.
- **Location of potential receptors** (for example, housing, controlled waters – groundwater and surface water), including those close to, but outside, your operating site boundary. Identify all land uses immediately surrounding the site, including any areas of public open space and protected sites. Only SACs, SPAs, Ramsar or SSSI sites within 1km of the operating site need to be identified on the site plan.

B1.3 Is your operating site located within the boundary of a site that is covered by another Environmental Permit?

Provide the name of the holders and the reference details of the existing permit. Check the existing permit to ensure that your process contributions are not having an 'in-combination' effect that will increase compliance limits (for example, emission limits) of the existing permit. Where the 'in-combination' effect is likely to cause a breach of the conditions of the existing permit, then it is likely that we will not allow the new activity. If your proposed new activity is operated in such a way that it is a Directly Associated Activity¹ to the existing permit, then the existing permit will have to be varied to include your proposed new activity.

Please be aware that if you intend to operate a mobile plant permit within a site covered by another environmental permit, and there is a conflict between the conditions of the site-based permit and the mobile plant permit, the site-based permit conditions will take precedence over the mobile plant permit.

¹ A directly associated activity is an operation that has technical connections with the activity that is covered by a permit, which is carried on on the same site as the activity, and which could have an effect on pollution.

B1.4 a) Is your operating site within 500 metres of a SPA, SAC, Ramsar or Site of Special Scientific Interest (SSSI)?

For standard rules SR2010No11 holders

If your site is within 500 meters of a designated European Site (SAC, SPA, Ramsar) or Site of Special Scientific Interest (SSSI) a site-specific risk assessment will be required. Your risk assessment (as required in B7.1) must take into consideration the features of the designated sites and must include information on how you are going to manage your operations to ensure that they do not have an impact on any of the features of the special sites.

If your site is not within 500 metres of a European Site (SAC, SPA, Ramsar) or Site of Special Scientific Interest (SSSI) only the generic risk assessment is required.

Please note that the requirements of the Habitats Directive and the Countryside and Rights of Way Act 2000 mean that we must consider the impacts of your activity on the following types of sensitive sites:

- Special protection areas (SPA)
- Potential special protection areas (pSPA)
- Special areas of conservation (SAC)
- Candidate special areas of conservation (cSAC)
- Ramsar sites; these are designated under the International Convention on Wetlands of International Importance, especially as waterfowl habitat (the Ramsar Convention).
- Site of Special Scientific Interest (SSSI)

Information on designated environmentally sensitive sites can be found at www.magic.gov.uk.

We also have the duty to protect other nature conservation, heritage and landscape sites which do not fall within European Sites, Ramsars or SSSI. These include Biodiversity Action Plan (BAP), National and European protected species and BAP habitats. Due to the sensitive nature of these protected species and sites information on them cannot be made publicly available but we will take them into account during the assessment process.

For bespoke permit holders

Bespoke permits do not have any generic risk assessments; therefore you will have to submit a site-specific risk assessment in all cases.

B1.4 b) Is your operating site within a groundwater Source Protection Zone (SPZ) 1 or 2?

This applies to SR2010No11 and bespoke activities.

The storage and treatment of waste can present risks to groundwater. Leachate or other polluting substances may leak from storage and treatment areas. We are highly unlikely to authorise waste treatment activities in SPZ1. We will require a detailed site-specific risk assessment (for all permit types) if your site lies within SPZ1 or SPZ2. Search for 'Groundwater Protection principles and practice GP3' on www.gov.uk/environment-agency.

Information on groundwater source protection zones can be found by searching for Groundwater Source Protection zones on www.gov.uk/environment-agency.

Waste treatment activities should not be situated close to water supplies intended for human consumption because of the inherent risks associated with such operations. We would consider the nature of your activity, its pollution potential, measures you will take to reduce risks to the water environment and how close it is to a groundwater source protection zone (SPZ) or water supplies intended for human consumption. Generally, the closer the activity, the greater the risk. We will apply a risk-based approach to making our decision and we may not authorise your activity if we think that the risk is high. In some cases, where the risk is considered medium or low, we may require you to have pollution prevention measures, such as an impermeable unit, in place.

Note that a separate permit (groundwater authorisation or surface water discharge consent) might be required if you plan to discharge effluents generated from your treatment process to ground or surface water. We are unlikely to permit discharges of liquid effluent to ground in SPZ1. This position is set out in chapter 4 of GP3 Part 4. Information and details on how to obtain such permits or authorisations can be found by searching for 'Check if you need an environmental permit' on www.gov.uk/environment-agency.

B1.4 c) Is your operating site within 250 metres of a human dwelling place?

This question applies to bespoke activity only.

We expect most mobile plant treatment activities to be situated away from an occupied human dwelling place for example, residential areas, hospitals, schools etc. This is to ensure that the environmental impact on human receptors is minimal.

If you indicate that your operating site is within 250 metres of a human dwelling place, we would expect you to carry out a detailed risk assessment in section B7 and to justify why your proposed activity should be allowed in your chosen location. In our assessment we would consider the nature of your proposed activities (high-risk or low-risk), the frequency of exposure of the receptors and environmental protection measures you have place.

B1.5 Are your storage and treatment activities planned to take place on an impermeable surface with side bunds and sealed drainage facilities?

We would expect, as a default, that all waste materials are stored, treated or handled in an area of the site with an engineered containment (impermeable surface) and sealed drainage system. Areas of impermeable surface, bunding and drainage system must be designed, constructed and maintained, such that it is fit for purpose to prevent escape of liquid or potentially polluting materials

from the designated areas. Drainage from the area of the impermeable surface must be designed to collect all liquids and run-off and must be either lawfully discharged to (foul sewer only for SR2010No11) or be connected to a sealed sump. The sealed sump must be inspected and emptied when the collected liquids reach 80% of its capacity.

If you hold SR2010No11 and answered 'No' to the question, we would expect you to provide further justification to explain why you think that you will not need an impermeable unit for your site operations. If you identified that you are going to use alternative measures, then we would want you to explain why you considered your proposed alternative measures suitable to mitigate the risks associated with your activities. Further information on the design of such alternative measures would be useful in our assessment process.

B2 Specified activities to be carried out at the site

B2.1 Please provide a brief description your proposed activities, including information on any treatment or storage activities that will be carried out as part of this deployment.

We will be able to assess your application more quickly if we have a brief description of your planned activities and an explanation of how they are connected with one another. The designs of some plant and equipment are complex and you should provide a simplified, non-technical description of how they are operated in principle. This will enable us to visualise the possible risks that might be associated with the operation of such plant and equipment. The description of your activities must include information on processes and procedures for handling the 'as received' waste, as well as information on the outputs, emissions and effluents that might result from your treatment activities.

Note that the lists of the technologies that you would want to deploy at this site must match those allowed in your permit. We will not approve a deployment application if it includes technologies that are not allowed in the permit. You will either have to remove these technologies from your deployment application or apply to vary your permit. We will not be able to agree your deployment application until the variation is complete.

B3 Waste types and quantities

B3.1 Please specify the types and quantities of wastes that will be stored and treated at this site. Include information on the six-digit List of wastes code for the waste types.

Fill in details of the type, code, quantity and nature of the waste types that you want to treat. It will help us process your application if you also provide details of any wastes generated as part of the treatment. You must use the most appropriate six-digit List of wastes code and describe the waste using its common description or name. The waste you are proposing to store and treat must be a waste listed in the permit to which this deployment relates.

Please note that if your deployment is under standard rules SR2010No11, the maximum amount of waste that you can treat under a single deployment is 75,000 tonnes and the maximum amount of waste that you can store at any one time is 5,000 tonnes.

For bespoke activities, the maximum quantity of waste will be set out in your permit.

B4 Duration of this deployment

B4.1 What is the duration of the activities that will be carried out under this deployment form?

You must tell us how long you want the deployment to last for. We usually expect deployments to last for a maximum of one year (12 months). If you think that your deployment will last longer than one year, you must provide adequate justification with your application at the point of your initial submission. One deployment form should be completed even when it is anticipated that there may be several distinct phases to your planned activities that may be separated in time.

If you are applying to extend your deployment, you must complete the deployment form and give your previous deployment reference number. You will also need to provide evidence as to why the treatment period needs to be extended and information on any changes that may have occurred at the site during the initial period of your operation.

Note that the deployment of a waste treatment mobile plant can be extended only up to a further 12 months. No further extensions will be issued thereafter as you will be expected to have assessed whether the ongoing treatment operation at the site should be permitted as an installation or a site-based waste operation.

B5 Management supervision

B5.1 Technically competent management

All holders of environmental permits are required to demonstrate technical competence for activities associated with their permits. For mobile plant operations relying on the Wamitab/CIWM scheme, a technically competent manager (TCM) will be specified at the deployment application stage. We may need to contact the TCM during any compliance inspections of the site; therefore we need to know who the TCM is at this stage. Alternatively, competence can be demonstrated through a certified competence management system (CMS) under the EU Skills scheme.

B6 Material management procedures

B6.1 Please provide details of the procedures on how wastes and residual materials will be handled, stored and treated at this site.

We generally expect the deployment of a mobile plant to be at the site of origin or potential use of the waste. Whether treatment activities are planned at the site of origin or of potential use of the waste, we would require that you have a robust waste acceptance procedure in place to prevent unacceptable waste being brought onto your site. You may have already provided some of this information on your Management System during your permit application. You may refer to this document and use this section to provide information on any additional, site-specific procedures you will use.

Site-specific procedures should include information on how wastes will be received, characterised, transported and tested (during and after treatment) to ensure that it is fully recovered. Waste materials must be kept separate and must not be mixed.

It is sometimes the case in waste treatment operations that there are some materials (resulting from the treatment process) that cannot be treated using the proposed technologies. The amounts of these materials are generally small when compared to the total waste input. We want to know:

- what you intend to do with any materials that cannot be treated by the proposed technologies;
- how they will be identified; and
- the methods that you will adopt to ensure that they are kept separate from other materials or waste streams that are treatable.

B6.2 Please specify the maximum capacities of quarantine facilities that will be used for the storage of wastes destined for retesting, reprocessing or off-site disposal.

You should include details of any containment units that you will put in place to ensure that untreatable waste materials and residual waste are kept separate to prevent or minimise pollution. Please clearly indicate the locations of any quarantine facility on the site plan.

B7 Conceptual site model and risk assessment

B7.1 For SR2010No11 only – Within which risk band does the activity fall?

The permit under which you are deploying will determine which part of Table B7.1 you must fill in. It is important to tick the correct box as the fee and the supporting documents you need to send with the application will be determined using this information.

B7.2 Please provide a conceptual site model (CSM) and detailed risk assessment which identifies all plausible pollution linkages (source–pathway–receptor relationships) and potential impacts that may result from your waste treatment, storage and handling operations. This is required for all bespoke deployments. You only need to provide a risk assessment for SR2010No11 if this was highlighted as being necessary under B1.4 or B1.5.

At the deployment assessment stage we are mainly concerned with your treatment activities and their likely impacts. This section should not be used to provide details on why the treatment is needed, but to provide detailed information on the likely impacts of your activities on the local environment. The risk assessment must be site-specific and directly relevant to the activity being carried out at the location. It should identify all plausible pollution linkages (source–pathway–receptor relationships) relating to the operation that could result in pollution or harm to human health and the environment, including information on the risk management option to mitigate identified risks.

Your CSM and risk assessment should consider:

- All potential sources of pollution including:
 - the contaminants;
 - ‘daughter’ products that may result from the treatment process;
 - waste residues (for example, waste waters);
 - emissions, (for example, dust, fibres, particulates, vapours, gases, aerosols, odour, noise, vibration and VOCs);
 - reagents used;
 - the final treated material; and
 - storage of fuels or chemicals.
- All potential pathways that exist without control measures, such as an engineered containment system, in place. This might include dermal contact, inhalation, migration through groundwater or fractured rocks, surface water runoff etc.
- The actual receptors around the site (for example, human, controlled waters – surface and groundwater) that may be at risk.
- Information on any special habitat sites, such as SPAs, SACs Ramsar, SSSIs, that are likely to be affected. Your assessment must consider the likelihood and the consequences of an impact. This must be factored into your control measures.
- Identify the mitigating measures taken to control the risks.

You can choose any format for your CSM and risk assessment. Your application will be easier for us to assess if you present your risk assessment using the template provided in Appendix 1. Additional guidance on risks and how to complete a risk assessment can be found by searching for ‘Risk assessment for your environmental permit’ at www.gov.uk/environment-agency.

We may not authorise your activity if we believe that it will pose unacceptable risks to any of the identified receptors or that it will reduce the quality of the environment.

B8 Pollution control

This question applies to noise, dust, particulates, fibres, aerosols, bio-aerosols, odour, VOCs, vapours, fuel, oil or chemical storage, vibration, and pests.

B8.1 Please provide details of any site-specific measures needed to control or minimise emissions and prevent pollution of the environment or harm to human health resulting from your waste treatment, storage and handling operations.

This should detail the control measures that you will put in place to minimise risks and impacts identified in the risk assessment that you completed as part of B7.1. For example:

- How you are going to collect, treat and contain any dusts, fibres, particulates or aerosols from the treatment process to prevent pollution and harm to human health.
- How you are going to minimise any noise and vibration at the site; for example, by strategic site layout, screening or temporary bunding.
- How odours and VOC emissions are to be controlled or captured at the operating site.
- If the nature of the material that is to be stored and treated is such that it will contain substances that will attract pests or scavengers or is likely to release litter, how these will be managed and controlled.
- How groundwater and surface water contamination will be prevented or minimised – provide information on the nature and design of your containment systems (impermeable units), drainage systems, bunds, etc.

Please search for ‘Risk assessment for your environmental permit’ at www.gov.uk/environment-agency for information on measures that you can take to control the risks that may result from your activity.

B9 Emission monitoring plans

B9.1 Please provide a site-specific monitoring plan for any emissions that may be generated by the proposed treatment operations.

Your monitoring plan must include information all or some of the following as they are applicable to your operations: groundwater, surface water, air emissions, noise, vibration, odour and VOCs. Specify the indicator parameters you propose to use for each of the emissions being monitored and provide a justification of why they are the most appropriate parameters to detect impact and prevent pollution. Depending upon your technology, the plan should include both point-source and wider (fugitive) emissions monitoring.

You must provide a site-specific monitoring plan that is appropriate for the proposed activity. Where your risk assessment has shown there is an emissions risk which requires control, you must monitor to determine the emissions and the effectiveness of any abatement systems. For example, stockpiling at a site surrounded by residential properties would require air monitoring for dusts and VOCs both close to the stockpile and at boundaries depending on location of receptors.

The level of monitoring would depend on the risks involved. Your monitoring plans should include the following:

- Pollutants to be monitored.
- Emission limits and trigger levels for each pollutant.
- Number and location of monitoring points, including point-source emissions. Point-source emissions include stack emissions, off-gases from exhaust and effluent from water treatment plants. These must be monitored or sampled prior to discharge. The environmental media into which they are being discharged (air, surface and groundwater) must also be monitored (usually at site boundaries) to ensure environmental quality standards (EQS) are maintained.
- Influent and effluent details (only use this if there is no emission limit for a particular hazardous air pollutant. A 95% removal rate must be maintained at all times).
- Monitoring protocol, including frequency of monitoring, type of equipment, calibration, accreditation, sample collection and procedure.
- The experience and qualifications of personnel carrying out the monitoring and the personnel responsible for interpreting and acting upon the results of monitoring.
- Emissions action plan; that is, the action to be taken if an agreed trigger level is exceeded.
- A baseline monitoring programme; this might be required where other emission sources similar to the proposed activity already exist. Background levels would act as a reference level for the relevant parameters that would be monitored. This will alert you to an increase or decrease in emissions.

For boundary air quality monitoring, a trigger level for each parameter (for example, between 80% and 90% of the air quality criterion), must be provided. Relevant trigger levels must be protective of each environmental medium or human health. For point-source emissions (such as stack emissions after scrubbing; oxidation), you should provide a quantitative H1 assessment. If a monitoring plan has already been completed for the operating site for other purposes (for example, during permit application) then any parts of it that you wish to use to demonstrate that your activities have no impact may simply be incorporated into this deployment form. However, as a minimum we would expect to see trigger levels for noise, dust and VOCs (if relevant to your process). Table B9 gives guidance on how to set these.

Table B9 Pollution trigger levels

Type of pollution	Trigger levels
Noise	<p>Normally, not more than 5dB above background noise level according to BS4142.</p> <p>The aim of noise monitoring should be to ensure that there is no reasonable cause for annoyance to persons beyond the operating boundary. Trigger levels based on the health and safety of on-site employees are not appropriate. Proposals for noise trigger levels that take into account background noise levels at the site boundary in line with BS 4142:1997 'Method for rating industrial noise affecting mixed residential and industrial areas' are considered more appropriate. Please refer to our guidance for the regulation of noise at waste management facilities at www.gov.uk/environment-agency.</p>
Dust	Check the M17 Guidance for information on trigger level at www.gov.uk/environment-agency .
VOCs (based on the indicator parameter)	Consult 'Risk assessment for your environmental permit' at www.gov.uk/environment-agency for the relevant trigger level for the indicator parameter you have chosen. Where emission limits are not available for the VOCs compounds being monitored, available limits on the EH40 guidance may be accepted. Limits in EH40 might need further adjustment in line with methodologies where sensitive receptors are likely to be exposed over periods greater than eight hours.

B10 Record Keeping – commissioning, operating and maintenance

B10.1 Please provide details about your commissioning, operation and maintenance plan and further information on records that you are required to send to us during your operations.

You must provide details of your commissioning, operating and maintenance procedures, including documentation and record keeping, to show that emissions from your treatment processes are not causing pollution or harm to human health.

This section should be used to explain how your emissions monitoring and sampling results and waste returns will be sent to the environment.

B11 Fee

You may need to work out your deployment charge. Once you have worked out the fee band for this deployment, tick one of the boxes provided to indicate your preferred payment method. You can find out the charge by searching for 'Environment Agency charging scheme and guidance: environmental permits, licence and registration costs and fees' at www.gov.uk/environment-agency.

The deployment fees are charged differently depending on whether they are for standard rules or bespoke activities. The charges are made for each deployment and will cover your activities for one year (12 months). If you want to extend your deployment beyond timescale agreed in your original application, and the total duration is not more than one year, we will not charge you for the extension. However, if the total deployment period extends the timescale beyond the 12 months, then a new deployment application will be required, together with the full fee.

Note that your deployment charge will be adjusted in accordance with your performance. Information on deployment fees and charges and on how they could be affected by your compliance rating can be found by searching for 'Environment Agency charging scheme and guidance: environmental permits, licence and registration costs and fees' at www.gov.uk/environment-agency.

Compliance monitoring is especially important for mobile plant permits as the surrender requirements are so minimal. We will take your rating into consideration when we assess your deployment charges.

B12 Checklist of supporting documents

Use this checklist to provide us with information on the extra documents that you have included with your deployment application. The evidence you submit should be as concise as possible and should always relate directly to your proposed activity. Although sending a large volume of documents not directly relevant to your proposed activity will not affect our decision, it will delay our assessment process.

Appendix 1 – Risk assessment table

[illegible]