

## Part MPP2

# Application for a deployment

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# General Notes

Please read these notes carefully before you fill in the forms. All relevant guidance documents can be found on our website or are available on request.

This guidance will help you complete application form MPP2 for mobile plant deployments where the operator holds a permit referring to:

- Standard Rules SR2008No27 Mobile plant for the treatment of soils and contaminated material, substances or products
- Bespoke mobile plant permit for the treatment of waste soils and contaminated material, substances or products
- Bespoke permit for treatment using mobile plant

Before you can use your mobile plant permit at a site, you must have filled in a deployment form and sent it to Natural Resources Wales with any necessary additional information. Only once Natural Resources Wales has given its agreement in writing to this deployment form can the waste operations start at the site.

The operations agreed under the deployment form are valid for 12 months from the date of commencement of the work on site. If you wish to continue operations after the 12 month period, you will need to submit a new deployment form and accompanying fee. Please note that the extended deployment application will be assessed against the definition of mobile plant. If it fails to meet this definition, then the deployment cannot be approved.

Once agreed in writing by Natural Resources Wales, the terms of this deployment form must be complied with. Amendments can be made to the details contained in this deployment form but can only be acted upon if Natural Resources Wales has first agreed to the amendment in writing.

The agreed deployment form is part of your mobile plant permit and so operating in breach of the agreed form or any other rule of your mobile plant permit could lead to Natural Resources Wales taking enforcement action. Our guidance '[How to Comply with your Environmental Permit](#)' will help you to make sure that you do not breach any of your permit's rules.

You may submit as many deployment forms as you wish. This allows you, as the permit holder, to operate under the one mobile plant permit on as many sites as there are deployment forms agreed in writing with Natural Resources Wales. Only the mobile treatment processes specified in your mobile plant permit can be carried out.

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

- answer all the questions. 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 get in touch with you for the information and our decision may be delayed
- allow for at least 25 working days from the time your application is complete for us to make our assessment. The application will be considered complete when all documentation has been sent and you have paid the correct fee.

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 waste operations including storage of waste without written confirmation that the deployment is agreed, you will be committing an offence of deposit of waste without a permit.

## How much will it cost?

Details of the charges can be found in the ['Our Charges'](#) section on our website.

# Completing the form

## About your permit

### Permit under which this deployment is taking place

Choose the option that applies, based on the type of permit you hold and the activity you want to do. The activity set out in the deployment must be in line with the extent of the activity/activities in the relevant permit. For example, the waste types, tonnages, treatment types etc.

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

### Name and address of permit holder (Operator)

Please give the name and main address of the operator or the company, individual or organisation who is making the application.

### Who can we talk to regarding 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.

## Deployment details

### Have we been consulted on your Conceptual Site Model/Risk Assessment/ Remediation Strategy?

This will help us to determine your application as quickly as possible. If you haven't consulted us already, we suggest you do so before making your deployment application

### Have there been any changes to your proposal since its consultation?

Please provide details of the changes to your proposal. If your proposal has changed, this may require further assessment and may extend the determination time.

## **If you have not received any planning or pre-application advice, would you like this application to be assessed without having remediation targets pre-agreed by us?**

Please note it is your responsibility to ensure remediation has been completed to a satisfactory state.

It is recommended that you contact us for pre-application advice prior to submitting your application. If you're a deployment notification under mobile plant, we can give you up to one hour's advice. This consultation is beneficial to you as it will help to ensure you have a complete application.

## **Have you had any other pre-application advice from us?**

If you have had any discussions with Natural Resources Wales concerning this deployment before the application was submitted, please provide the pre-application reference number.

## **About the Site**

### **Site details**

Please give the site address where the treatment is to take place and a 12 figure Grid Reference of the centre of the site. Grid references can be found on [UK Grid Reference Finder](#).

## **Is your site located within a site covered by another Environmental Permit?**

Provide the name of the holders and the reference details of the existing permit. Check the existing permit for conditions, especially emission limits for compliance. If the proposed activity is operated in a way that it is a 'Directly Associated Activity' to the existing permit, then the existing permit would have to be varied to include the proposed activity.

## **Attach a site plan showing area of land where the treatment will take place**

You must provide an accurate and detailed site plan or plans.

It must show all the information listed below. We cannot accurately assess your application without this information:

- Operating site boundary (clearly outlined in red)
- Security and access arrangements (including additional details where alternative security, other than that specified in the licence 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).

- Areas of waste soils and contaminated material, substances or products for remediation by the mobile plant
- Location/siting of principle 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 clearly draw these, 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 and discharge points
- Proposed location of boundary monitoring points and pollution control units (e.g. for noise, dust and VOCs emissions)
- Potential receptors (for example, housing)– identify all land uses immediately surrounding the site on the site plan including any areas of public open space
- Protected sites – only SACs, SPAs, Ramsar or SSSI sites within 1km of the operating site need to be identified on the site plan

## Waste Types and Quantities

**Specify the waste types, quantities, contaminants, and European Waste Catalogue (EWC) code for each waste to be treated on site. Also, provide the treatment technologies to be used for each waste.**

It is quicker to assess your application if we have details of the contaminants present and their daughter products, the remediation method and the operating techniques proposed.

Fill in details of the nature of the contaminated material, quantity, contaminant to be treated, EWC code, and treatment technology you want to use. 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 waste code and describe the waste using its common description/name. The waste producer will use the [waste classification technical guidance - WM3](#). If your permit contains a list of waste, you must ensure the waste you wish to treat is listed within the permit. See also how to [Classify different types of waste](#).

List the technologies that you want to use. These should match those in your permit. We will not approve a deployment application if it includes technologies that are not 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.

## **Specified activities to be carried out at the site**

### **Please supply details of how the specified technology is suitable for treatment.**

Provide a brief description of the planned activities and explain how they are connected to one another. Provide a description of the authorised treatment technology or technologies and provide detail on why these technologies are suitable to treat the specific contaminants in the waste material.

### **Provide details how residual materials/waste which cannot be treated by the specified technology are to be handled at the site**

It should also cover what you intend to do with any materials/waste on site which cannot be treated. How these will be identified and the methods that you will use to ensure that they are kept separate from those materials/waste that can be treated.

### **Specify the maximum capacities of quarantine facilities to be used for the storage of contaminated materials destined for re-testing, re-processing or off-site disposal.**

You should also include details of any containment you will be putting in place to prevent or minimise pollution. Please clearly indicate the locations of any quarantine areas on the site plan.

## **Activities involving the import of waste**

### **Does the site form part of a Cluster project?**

Please indicate whether the site forms part of a Cluster project. This is where two or more sites use a shared treatment facility (a hub site) to help them recover and re-use waste soils.

For more guidance on whether or not your site forms part of a cluster project, please refer to [CL:AIRE Definition of Waste: Code of Practice](#)



## **Please supply details of the procedures to be adopted at the site to ensure that only those materials that are treatable with the specified technology will be treated.**

You should provide details of the measures that you will take to ensure that only the waste soil, contaminated material or contaminated groundwater that can be treated by the technologies you are planning to deploy will be treated. Your waste acceptance procedure must be robust enough to prevent unacceptable waste being brought on-site. You may have already provided some of this information in the environment management system for your permit. You may refer back to this document and use this section to provide information on any additional, site specific procedures you will use.

## **Duration of this deployment**

### **What is the duration (specified period) that this deployment form is required for?**

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 (52 weeks). If you think that your deployment will last for more than one year, you must provide adequate justification with your application at the point of initial approval.

One deployment form should be completed even when it is anticipated that there may be several distinct phases to the remediation activities that may be separated in time. Operators should have regard to any activities that will be carried out in relation to 'rebound' associated with the technology.

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 approved period of your operation.

## **Management supervision**

### **Please provide the name and contact details for the technically competent manager and nominated competent person who will oversee this deployment.**

All holders of environmental permits must demonstrate technical competence at the permit application stage or in accordance with any transitional provisions that may give time for technical competence to be acquired. A technically competent manager will be specified at this time.

Where mobile plant is used the activity may take place at some distance from the main office of the permit holder. Where deployments are countrywide, we need to know that the operator can discharge the requirements of ensuring they have control of day-to-day operations through their management procedures and any contractual arrangements. If

things go wrong, it is the permit holder who is ultimately liable. In these instances, you must nominate a competent person who will be the main contact for the deployment and who will report to the technically competent manager.

The nominated competent person must be able to visit sites to ensure the waste operations are not causing any environmental problems. They must be able to get to the site within a reasonable time in case any problems occur, or a Natural Resources Wales officer wishes to meet them on site.

There may be several nominated competent persons for any one operator.

**Provide information on the site supervision plan for your technically competent manager. Specify what treatment methods can be operated unsupervised and provide a justification as to why this should be the case.**

There is a minimum requirement for attendance which is for a minimum of 1 hr/week.

Further guidance relating to technically competent management and attendance requirements can be found in [How to comply with your Environmental Permit](#)

Site supervision for treatment methods that could be operated unsupervised will be agreed on a case by case basis.

## **Conceptual Site Model and Risk Assessment**

**Please provide a conceptual site model (CSM) which identifies all plausible pollution linkages (source-pathway-receptor relationships) and potential impacts to the local environment which could arise as a result of the proposed treatment activities.**

The CSM should consider all potential sources of pollution including:

- the contaminants themselves
- daughter products resulting from the remedial action
- waste residues generated during the remedial action for example, waste waters
- emissions (e.g. dust, fibres, particulates, vapours, gases, aerosols, odour, noise, vibration and VOCs)
- reagents used
- the final treated material
- storage of fuel oil or chemical

The CSM should list all site-specific pathways that exist without control measures (e.g. engineered containment system) in place. This might include dermal contact, inhalation, migration through groundwater and fractured rocks, surface water runoff etc.

The CSM should identify the actual receptors surrounding the site that may be at risk including information on any special habitat sites that are likely to be affected.

You can choose the format of your conceptual site model. Please cross reference any conditions in your permit, where applicable, that require appropriate pollution control measures to be in place.

The risk assessment involves identifying potential source-pathway-receptor linkages and then putting in the management controls that remove or reduce any risks to the receptor. You must detail the steps that will be taken to manage the risk to the sensitive receptors identified. These should include written management and operational procedures that are required as part of your permit to control any risk to human health or pollution of the environment. The controls put in place depend on both the properties of the waste and the sensitivity of the receptors. Additional guidance is included in [Risk assessments for specific activities: environmental permits](#).

## Finding information on sensitive receptors

You can find information on:

- [Find protected areas of land and sea](#)
- [Lle Geo-Portal for Wales](#)
- [Wales environmental information mapping system](#)

## Pollution Control

### **Please provide details of any site specific measures needed to control/minimise emissions, and prevent pollution of the environment and/or harm to human health resulting from your treatment activities**

This should detail the control measures that you will put in place to minimise risks/impacts identified in your risk assessment.

For example:

- How you are going to collect, treat and contain any dusts, fibres and particulates 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 strategic site layout, screening, temporary bunding.
- How odours and VOC emissions are to be controlled 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

## Emission Monitoring Plans

### **Provide a site specific monitoring plan for any emissions that may be generated by the proposed treatment activities.**

They may include all or some of the following: groundwater, surface water, soil gases, 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 on 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 but as a standard rule, daily visual and olfactory monitoring should be considered.

Your monitoring plans should include the following:

- Pollutants to be monitored
- Emission limits and Trigger levels for each pollutant
- Number and location of point source emission points. Point source emission include stack emissions, off-gasses from exhaust, effluent from water treatment plants. These must be monitored/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 are no emission limits for a particular hazardous air pollutant. A 95% removal rate must be maintained at all times)
- Monitoring protocol which includes 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 or interpreting and acting upon the results of monitoring

- Emissions action plan (the action to be taken if an agreed trigger level is exceeded)
- A baseline monitoring programme 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 parameter(s) 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 air quality criterion) must be provided. Relevant trigger levels must be protective of each environmental medium or human health. For point source emissions (stack emissions after scrubbing, oxidation, and so on.), you should provide a quantitative H1 assessment. If a monitoring plan has already been completed for the operating site for other purposes, for example development control then any parts of it that you wish to use to demonstrate no impact from your activities may simply be incorporated into this deployment form. However, as a minimum we would expect to see trigger levels for noise, dust and VOCs.

## Noise monitoring

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 4142:2014+A1:2019 Methods for rating and assessing industrial and commercial sound](#) and [Environmental permitting: H3 part 2 noise assessment and control](#)

## Record Keeping - Commissioning, operating and maintenance

**Provide details of commissioning, operating and maintenance including documentation and record-keeping to ensure that emissions from the process do not cause pollution of the environment and harm to human health.**

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.

### Extra guidance in relation to commissioning:

Only the materials necessary to complete commissioning are allowed to be treated until a validation report, prepared by a suitably qualified person, for example, engineer, microbiologist (dependent upon the technology) has been provided to Natural Resources Wales demonstrating that commissioning has been successfully achieved. The operator must comply with the conditions of the permit during commissioning operations.