

Environment Agency permitting decisions

Bespoke permit

We have decided to grant the permit for Unit C Bilton Way operated by G.C. Metals Limited.

The permit number is EPR/PP3233RS.

We consider in reaching that decision we have taken into account all relevant considerations and legal requirements and that the permit will ensure that the appropriate level of environmental protection is provided.

Description of the main features of the Installation

Various waste types containing non-ferrous precious metals are received at the installation, analysed for content and then processed for recovery.

Recovery methods are as follows:

- Stripping, dissolving, refining and precipitation
- Melting / smelting
- Pyrolysis

Some wastes are crushed prior to input to the recovery processes outlined above via mills and a crusher. Scrap jewellery is crushed and bulked prior to shipping to smelters for recovery.

Purpose of this document

This decision document:

- explains how the application has been determined
- provides a record of the decision-making process
- shows how all relevant factors have been taken into account
- justifies the specific conditions in the permit other than those in our generic permit template.

Unless the decision document specifies otherwise we have accepted the applicant's proposals.

Structure of this document

- Key issues
- Annex 1 the decision checklist
- Annex 2 the consultation and web publicising responses

Key issues of the decision

Emissions to air

The dissolution process is carried out in Aqua Regia; a mixture of hydrochloric acid and nitric acid. The process is conducted in a small open topped vessel in an enclosed cabinet and any fumes emitted are drawn away from the operation passed through an absorption system and discharged through a scrubber.

A filtration system will abate emissions from the furnace.

Monitoring of emissions from the abatement at another permitted site where the operator carries out the same activities has demonstrated that the emissions are insignificant when considering potential for impact on both the environment and human health.

The scrubber and filtration system will be in place for the protection of the health of the workers as required by the Health and Safety at work legislation. There is no reliance on the abatement systems to minimise emissions for environmental reasons as these are insignificant when compared to the relevant environmental quality standards.

The metal crushing process will only be carried out in sealed machinery to minimise emissions of dust.

Low impact installation (LII) - Operating techniques

We are satisfied that the operator has demonstrated that the proposed operation complies with LII criteria, specified in Environment Agency Application Form B2, Appendix 1, 'Low impact installation checklist' as summarised below:

Management Techniques - The activity operates under an in-house management system in order to demonstrate compliance with permit condition 1.1.1. The applicant has operated this activity at another site for a significant number of years under an LII permit.

Aqueous waste - The process is primarily a dry treatment operation and uses little water so it is likely that the operation would release more than 50m³ of water per day.

Abatement systems/releases to air - There is no reliance on abatement systems for environmental emissions. There are two abatement systems in place for the protection of the health of the workers as required by the Health and Safety at work legislation as follows:

- A scrubber will abate emissions from the dissolving, refining and precipitation process and from the stripping process.
- A filtration system will abate emissions from the furnace.

Groundwater regulations - No releases to groundwater. All treatment and analytical work will take place within the building on an impermeable concrete surface.

Waste production - Averaged over a year; non-hazardous waste produced on site is approximately 2 tonnes per year with no hazardous waste produced.

Energy consumption - Consumption is below a rate of 3MWh.

Accident prevention - All potentially polluting liquids are stored within secondary containment and the site maintains an Accident Management Plan as part of the Management System.

Noise – The site is situated within a predominately industrial area. Any machinery with the potential for higher noise levels will be situated within sound proofed enclosures to minimise the potential for noise emissions outside of the installation boundary.

Emissions of polluting substances – the environmental risk assessment confirmed no likelihood of a significant release to the environment of any particular substance.

Odour – Operational techniques are in place to limit the potential of odour generation. The operator has confirmed that the extraction of air from the process via a scrubber is done in order to maintain compliance with Health and Safety at work legislation. There are no point source emission points to the external atmosphere.

Compliance history - No history of environmental enforcement with this Operator.

Annex 1: decision checklist

This document should be read in conjunction with the application, supporting information and permit/notice.

Aspect considered	Justification / Detail	Criteria met
		Yes
Consultation		
Scope of consultation	<p>The consultation requirements were identified and implemented. The decision was taken in accordance with Regulatory Guidance Note (RGN) 6 High Profile Sites, our Public Participation Statement and our Working Together Agreements.</p> <p>For this application we consulted the following bodies:</p> <ul style="list-style-type: none"> • Health and Safety Executive • Local Authority – Environmental Health 	✓
Responses to consultation and web publicising	<p>The web publicising and consultation responses (Annex 2) were taken into account in the decision.</p> <p>The decision was taken in accordance with our guidance.</p>	✓
Operator		
Control of the facility	<p>We are satisfied that the applicant (now the operator) is the person who will have control over the operation of the facility after the grant of the permit. The decision was taken in accordance with EPR RGN 1 Understanding the meaning of operator.</p>	✓
European Directives		
Applicable directives	<p>All applicable European directives have been considered in the determination of the application.</p>	✓
The site		
Extent of the site of the facility	<p>The operator has provided a plan which we consider is satisfactory, showing the extent of the site of the facility.</p> <p>A plan is included in the permit and the operator is required to carry on the permitted activities within the site boundary.</p>	✓
Site condition report	<p>The operator has provided a description of the condition of the site.</p> <p>The Site Condition Report outlined the following:</p> <ul style="list-style-type: none"> • The site is located on an industrial estate • The storage and process will take place in a building with concrete floors. • The site is not located in a Source Protection 	✓

Aspect considered	Justification / Detail	Criteria met
		Yes
	<p>Zone.</p> <ul style="list-style-type: none"> • The site is not located in a flood zone. • There is no record of pollution at the site. <p>We consider this description is satisfactory. The decision was taken in accordance with our guidance on site condition reports and baseline reporting under IED–guidance and templates (H5).</p>	
Biodiversity, Heritage, Landscape and Nature Conservation	<p>The application is within the relevant distance criteria of a site of heritage, landscape or nature conservation, and/or protected species or habitat.</p> <p>An assessment of the application and its potential to affect the sites has been carried out as part of the permitting process. We consider that the application will not affect the features of the sites. See key issues section for further information.</p> <p>We have not formally consulted on the application. The decision was taken in accordance with our guidance.</p>	✓
Environmental Risk Assessment and operating techniques		
Environmental risk	<p>We have reviewed the operator's assessment of the environmental risk from the facility.</p> <p>The operator's risk assessment is satisfactory.</p> <p>The assessment shows that, applying the conservative criteria in our guidance on Environmental Risk Assessment, all emissions may be categorised as environmentally insignificant. See key issues section for further information.</p>	✓
Operating techniques	<p>We have reviewed the techniques used by the operator and compared these with the relevant guidance notes. The operator has proposed the following key measures:</p> <ul style="list-style-type: none"> • Treatment of waste will only be carried out in the dedicated building. • Liquids will be stored only on a impermeable surface. • All liquids will be bunded. • All areas will be inspected on a monthly basis to ensure continuing integrity. 	✓

Aspect considered	Justification / Detail	Criteria met
		Yes
	<ul style="list-style-type: none"> The metal crushing process will only be carried out in sealed machinery. <p>We consider that these techniques are in line with the Sector Guidance Note for Non-Ferrous Metals S2.02.</p>	
The permit conditions		
Waste types	<p>We have specified the permitted waste types, descriptions and quantities, which can be accepted at the regulated facility.</p> <p>A number of 99 waste codes were listed in the application. The applicant has included a specific description of these waste codes which are incorporated into the permit through the operating techniques.</p> <p>We made these decisions with respect to waste types in accordance with the Sector Guidance Note for recovery and disposal of hazardous and non hazardous waste S5.06.</p>	✓
Incorporating the application	<p>We have specified that the applicant must operate the permit in accordance with descriptions in the application, including all additional information received as part of the determination process.</p> <p>These descriptions are specified in the Operating Techniques table in the permit.</p>	✓
Reporting	<p>We have specified reporting in the permit. Parameters, for which reports shall be made are listed in Schedule 4 of the permit.</p>	✓
Operator Competence		
Environment management system	<p>There is no known reason to consider that the operator will not have the management systems to enable it to comply with the permit conditions. The decision was taken in accordance with RGN 5 on Operator Competence.</p>	✓
Relevant convictions	<p>The National Enforcement Database has been checked to ensure that all relevant convictions have been</p>	✓

Aspect considered	Justification / Detail	Criteria met
		Yes
	<p>declared.</p> <p>No relevant convictions were found. The operator satisfies the criteria in RGN 5 on Operator Competence.</p>	
Financial provision	There is no known reason to consider that the operator will not be financially able to comply with the permit conditions. The decision was taken in accordance with RGN 5 on Operator Competence.	✓

Annex 2: Consultation and web publicising responses

Summary of responses to consultation and web publication and the way in which we have taken these into account in the determination process.

Response received from
Health and Safety Executive
Brief summary of issues raised
No response received
Summary of actions taken or show how this has been covered
No action required.

Response received from
Local Authority – Harborough District Council
Brief summary of issues raised
No response received
Summary of actions taken or show how this has been covered
No action required.

The application was advertised on our website from 28/08/15 to 29/09/15 and no responses were received.