

Review of an Environmental Permit for an Installation subject to Chapter II of the Industrial Emissions Directive under the Environmental Permitting (England & Wales) Regulations 2010 (as amended)

Decision document recording our decision-making process following review of a permit

The Permit number is: EPR/DP3337ZK

The Operator is: Harsco Metals Group Limited

The Installation is: Tinsley Park Works, Sheffield S9 1TZ

This Variation Notice number is: EPR/DP3337ZK/V003

What this document is about

Article 21(3) of the Industrial Emissions Directive (IED) requires the Environment Agency to review conditions in permits that it has issued and to ensure that the permit delivers compliance with relevant standards, within four years of the publication of updated decisions on BAT conclusions.

We have reviewed the permit for this installation against the revised BAT Conclusions for the iron and steel production industry sector published on 8th March 2012. This is our decision document, which explains the reasoning for the consolidated variation notice that we are issuing.

It explains how we have reviewed and considered the techniques used by the Operator in the operation and control of the plant and activities of the installation. This review has been undertaken with reference to the decision made by the European Commission establishing best available techniques (BAT) conclusions ('BAT Conclusions') for Iron and Steel Production as detailed in document reference C(2012) 903 . It is our record of our decision-making process and shows how we have taken into account all relevant factors in reaching our position. It also provides a justification for the inclusion of any specific conditions in the permit that are in addition to those included in our generic permit template.

As well as considering the review of the operating techniques used by the Operator for the operation of the plant and activities of the installation, the consolidated variation notice takes into account and brings together in a single document all previous variations that relate to the original permit issue. It also modernises the entire permit to reflect the conditions contained in our current generic permit template.

The introduction of new template conditions makes the Permit consistent with our current general approach and philosophy and with other permits issued to installations in this sector. Although the wording of some conditions has changed, while others have disappeared because of the new regulatory approach, it does not reduce the level of environmental protection achieved by the Permit in any way. In this document we therefore address only our determination of substantive issues relating to the new BAT Conclusions.

We try to explain our decision as accurately, comprehensively and plainly as possible. Achieving all three objectives is not always easy, and we would welcome any feedback as to how we might improve our decision documents in future.

How this document is structured

1. Our proposed decision
2. How we reached our decision
3. The legal framework

Annex 1- Review of operating techniques within the Installation against BAT Conclusions

Annex 2 - Review and assessment of changes that are not part of the BAT Conclusions derived permit review.

1 Our decision

We have decided to issue the Variation Notice to the Operator. This will allow it to continue to operate the Installation, subject to the conditions in the Consolidated Variation Notice.

We consider that, in reaching that decision, we have taken into account all relevant considerations and legal requirements and that the varied permit will ensure that a high level of protection is provided for the environment and human health.

The Consolidated Variation Notice contains many conditions taken from our standard Environmental Permit template including the relevant Annexes. We developed these conditions in consultation with industry, having regard to the legal requirements of the Environmental Permitting Regulations and other relevant legislation. This document does not therefore include an explanation for these standard conditions. Where they are included in the Notice, we have considered the techniques identified by the operator for the operation of their installation, and have accepted that the details are sufficient and satisfactory to make those standard conditions appropriate. This document does, however, provide an explanation of our use of “tailor-made” or installation-specific conditions, or where our Permit template provides two or more options.

2 How we reached our decision

2.1 Requesting information to demonstrate compliance with BAT Conclusion techniques

We issued a Notice under Regulation 60(1) of the Environmental Permitting (England and Wales) Regulations 2010 (a Regulation 60 Notice) on 13/09/2013 requiring the Operator to provide information to demonstrate how the operation of their installation currently meets, or will subsequently meet, the revised standards described in the relevant BAT Conclusions document. The Notice also required that where the revised standards are not currently met, the operator should provide information that

- Describes the techniques that will be implemented before 08/03/2016 which will then ensure that operations meet the revised standard, or
- justifies why standards will not be met by 08/03/2016, and confirmation of the date when the operation of those processes will cease within the installation or an explanation of why the revised BAT standard is not applicable to those processes, or
- justifies why an alternative technique will achieve the same level of environmental protection equivalent to the revised standard described in the BAT Conclusions.

Where the Operator proposed that they were not intending to meet a BAT standard that also included a BAT Associated Emission Level (BAT AEL) described in the BAT Conclusions Document, the Regulation 60 Notice requested that the Operator make a formal request for derogation from compliance with that AEL (as provisioned by Article 15(4) of IED). In this circumstance, the Notice identified that any such request for derogation must be supported and justified by sufficient technical and commercial information that would enable us to determine acceptability of the derogation request.

The Regulation 60 Notice response from the Operator was received on 02/04/2014.

We considered it was in the correct form and contained sufficient information for us to begin our determination of the permit review.

The Operator made no claim for commercial confidentiality. We have not received any information in relation to the Regulation 60 Notice response that appears to be confidential in relation to any party.

2.2 Review of our own information in respect to the capability of the installation to meet revised standards included in the BAT Conclusions document

Based on our records and previous regulatory activities with the facility we have no reason to consider that the operator will not be able to comply with the techniques and standards described in the BAT Conclusions.

2.3 Addition of newly prescribed activities

When the Industrial Emissions Directive was introduced into the regulatory framework in England, via amendment to the Environmental Permitting Regulations in 2012, the description of activities defined as installations changed to include for the first time some activities that take place at this facility. These activities have taken place at this facility for many years and have been regulated through this permit principally as activities directly associated to the primary activity of making and refining steel.

The revisions to the descriptions of Installations now means that the treatment of ashes and slags and the shredding of metals are listed scheduled activities in their own right and need to be included in the permit as such.

The Operator needed to apply to include these activities in their permit. An administrative variation application was therefore submitted in May 2015 seeking the inclusion of these new activities. The application was publicised in accordance with our Public Participation Statement. No comments were received from members of the public or other interested parties.

We consider that that application was in the correct form and contained sufficient information for us to determine whether those activities could be included in the permit as part of the review process.

We believe the operator has taken steps to prevent pollution of the environment or harm to human health from these particular activities, we consider the best available techniques are being used to manage these waste streams and the activities can be included in the permit as requested.

3 The legal framework

The Consolidated Variation Notice will be issued, under Regulation 20 of the EPR. The Environmental Permitting regime is a legal vehicle which delivers most of the relevant legal requirements for activities falling within its scope. In particular, the regulated facility is:

- an *installation* as described by the IED;
- subject to aspects of other relevant legislation which also have to be addressed.

We consider that, in issuing the Consolidated Variation Notice, it will ensure that the operation of the Installation complies with all relevant legal requirements and that a high level of protection will be delivered for the environment and human health.

We explain how we have addressed specific statutory requirements more fully in the rest of this document.

Annex 1: decision checklist regarding relevant BAT Conclusions

BAT Conclusions for the Production of Iron Steel, were published by the European Commission on 8th March 2012.

There are 95 BAT Conclusions of which only the following are relevant:

- BAT conclusion 1,2, 5-18 of Section 1.1 General BAT Conclusions
- BAT Conclusion 90 for BAT for on-site slag processing and handling is to prevent or reduce dust emissions
- BAT Conclusion 93 BAT is to prevent waste generation

This annex provides a record of decisions made in relation to each relevant BAT Conclusion applicable to the installation. This annex should be read in conjunction with the Consolidated Variation Notice.

The overall status of compliance with the BAT conclusion is indicated in the table as:

NA Not Applicable

CC Currently Compliant

FC Compliant in the future (within 4 years of publication of BAT conclusions)

NC Not Compliant

Annex 1: decision checklist regarding relevant BAT Conclusions

BAT Conclusion No	Summary of BAT Conclusion requirement	Status NA/ CC / FC / NC	Assessment of the installation capability and any alternative techniques proposed by the operator to demonstrate compliance with the BAT Conclusion requirement
General BAT			
1	BAT is to implement and adhere to an environmental management system (EMS)	CC	Environmental Management System (EMS) has been in place since 2005 which meets the requirements of ISO14001:2004 and covers all of the elements and sub-elements outlined in BAT 1.
2	BAT is to reduce thermal energy consumption by using a combination of techniques.	CC	<p>Noted that the BAT conclusion document refers to certain techniques being important for integrated steelworks in order to improve the overall energy efficiency and we accept that the use of steam boilers for reheating furnaces, combined heat and power and the use of 'modern, gravimetric solid fuel feed systems' is not relevant. In addition as Harsco is operations do not require significant thermal energy consumption. Electricity, gas and water are supplied through Outokumpo. An Energy reduction programme in place with carbon footprint reduction objectives being set.</p> <p>We have included</p>

BAT Conclusion No	Summary of BAT Conclusion requirement	Status NA/ CC / FC / NC	Assessment of the installation capability and any alternative techniques proposed by the operator to demonstrate compliance with the BAT Conclusion requirement
			condition 1.2.1(b) to review and record at least every four years whether there are suitable opportunities to improve the energy efficiency of the activities
3	BAT is to reduce primary energy consumption by optimisation of energy flows and optimised utilisation of the extracted process gases such as coke oven gas, blast furnace gas and basic oxygen gas.	NA	This not an integrated steel works. BAT conclusion 3 is not applicable as the site does not have any coke oven gas, blast furnace gas or basic oxygen gas.
4	BAT is to use desulphurised and dedusted surplus coke oven gas and dedusted blast furnace gas and basic oxygen gas (mixed or separate) in boilers or in combined heat and power plants to generate steam etc	NA	BAT conclusion 4 is not applicable as it relates to an integrated steel works and the site does not produce coke oven gas, blast furnace gas or basic oxygen gas.
5	BAT is to minimise electrical energy consumption by using one or a combination of techniques.	CC	See response to BAT3 above. Condition 1.2.1(b) requires energy recovery to be reviewed every 4 years. The Operator is required to report energy usage and energy generated under condition 4.2 of the permit.

BAT Conclusion No	Summary of BAT Conclusion requirement	Status NA/ CC / FC / NC	Assessment of the installation capability and any alternative techniques proposed by the operator to demonstrate compliance with the BAT Conclusion requirement
6	BAT is to optimise the management and control of internal material flows in order to prevent pollution, prevent deterioration, provide adequate input quality, and allow reuse and recycling and to improve the process efficiency and optimisation of the metal yield.	CC	All materials are recycled See BAT 11.
7	BAT is to select appropriate scrap qualities and other raw materials. Scrap sorting to minimise the risk of including hazardous or non-ferrous contaminants, particularly polychlorinated biphenyls (PCB) and oil or grease.	CC	The purchase, selection and sorting of scrap is managed by the Outokumpu and ownership is retained by them at all times. Harsco operate a scrap management controls system as part of the EMS. The WI requires checking the scrap.
8	BAT for solid residues is to use integrated techniques and operational techniques for waste minimisation by internal use or by application of specialised recycling processes (internally or externally).	NA	BAT is not applicable. Harsco operation does not produce any solid residues that are recycled on site or used internally however metal is recovered from slag and reused on site.
9	BAT is to maximise external use or recycling for solid residues which cannot be used or recycled according to BAT 8,	NA	BAT is not applicable. All material taken to Harsco is recyclable.

BAT Conclusion No	Summary of BAT Conclusion requirement	Status NA/ CC / FC / NC	Assessment of the installation capability and any alternative techniques proposed by the operator to demonstrate compliance with the BAT Conclusion requirement
	wherever this is possible and in line with waste regulations. BAT is to manage in a controlled manner residues which can neither be avoided nor recycled.		
10	BAT is to use the best operational and maintenance practices for the collection, handling, storage and transport of all solid residues and for the hooding of transfer points to avoid emissions to air and water.	CC	Conveyors and transfer points are covered. Solid residues are treated in the same way as raw materials and the response see BAT 11
11	BAT is to prevent or reduce diffuse dust emissions from materials storage, handling and transport	CC	Harsco has an EMS which includes objectives to improve dust suppression on site to reduce diffuse dust emissions. A fugitive dust emissions plan is in place (since March 2011). Outokumpo undertakes ambient PM ₁₀ monitoring.

BAT Conclusion No	Summary of BAT Conclusion requirement	Status NA/ CC / FC / NC	Assessment of the installation capability and any alternative techniques proposed by the operator to demonstrate compliance with the BAT Conclusion requirement
12	BAT for waste water management is to prevent, collect and separate waste water types, maximising internal recycling and using an adequate treatment for each final flow.	CC	Water is supplied by Outokumpu for the spray systems. Waste waters are collected via an interceptor tank prior to Outokumpu water system. Water used for the majority of the dust suppression on site is recycled. No potable water is used on site.
13	BAT is to measure or assess all relevant parameters necessary to steer the processes from control rooms by means of modern computer-based systems in order to adjust continuously & to optimise the processes online, to ensure stable & smooth processing, thus increasing energy efficiency & maximising the yield .	NA	<p>BAT is not applicable as this relate to steel production, operations undertaken by Outokumpu.</p> <p>BAT is not applicable</p>

BAT Conclusion No	Summary of BAT Conclusion requirement	Status NA/ CC / FC / NC	Assessment of the installation capability and any alternative techniques proposed by the operator to demonstrate compliance with the BAT Conclusion requirement
14	<p>BAT is to measure the stack emissions of pollutants from the main emission sources from all processes included in the Sections 1.2 – 1.7 whenever BAT-AELs are given and in process gas-fired power plants in iron and steel works.</p> <p>BAT is to use continuous measurements at least for:</p> <ul style="list-style-type: none"> • emissions of nitrogen oxides (NO_x) from power plants • dust emissions from large electric arc furnaces. <p>For other emissions, BAT is to consider using continuous emission monitoring depending on the mass flow and emission characteristics.</p>	CC	<p>This is not an integrated steel works, no requirement for continuous measurements of emissions of nitrogen oxides (NO_x) from power plants.</p> <p>The current permit already requires spot sampling of dust emissions from the fume booth, emission point A1. The results in 2013 were 4.6 mg/m³ well within the permitted limit of 20mg/m³.</p> <p>See table S3.1 of the permit</p>

BAT Conclusion No	Summary of BAT Conclusion requirement	Status NA/ CC / FC / NC	Assessment of the installation capability and any alternative techniques proposed by the operator to demonstrate compliance with the BAT Conclusion requirement
15	For relevant emission sources not mentioned in BAT 14, BAT is to measure the emissions of pollutants from all processes included in the Sections 1.2 – 1.7 and from process gas-fired power plants within iron and steel works as well as all relevant process gas components/pollutants periodically and discontinuously. This includes the discontinuous monitoring of process gases, stack emissions, polychlorinated dibenzodioxins/furans (PCDD/F) and monitoring the discharge of waste water, but excludes diffuse emissions	CC	There are no emissions to water. BAT is achieved.

BAT Conclusion No	Summary of BAT Conclusion requirement	Status NA/ CC / FC / NC	Assessment of the installation capability and any alternative techniques proposed by the operator to demonstrate compliance with the BAT Conclusion requirement
16	<p>BAT is to determine the order of magnitude of diffuse emissions from relevant sources by the methods</p> <ul style="list-style-type: none"> • Direct measurement methods where the emissions are measured at the source itself. • Indirect measurement methods where the emission determination takes place at a certain distance from the source; • Calculation with emission factors. 	CC	<p>As described above direct emission measurements are undertaken of fugitive releases for fume booth. Emission factors have been used to assess emissions from roads and the hand picking station. Further work is to be undertaken to be completed by 8th March 2016 to review.</p>
17	<p>BAT is to prevent pollution upon decommissioning</p>	CC	<p>A decommissioning plan is in place as part of the site condition report and meets site condition reports and baseline reporting under IED– guidance and templates (H5) and BAT guidance. All new equipment is designed with BAT.</p>

BAT Conclusion No	Summary of BAT Conclusion requirement	Status NA/ CC / FC / NC	Assessment of the installation capability and any alternative techniques proposed by the operator to demonstrate compliance with the BAT Conclusion requirement
18	BAT is to reduce noise emissions from relevant sources in the iron and steel manufacturing processes	CC	<p>Noise management is part of the EMS. Steps include the use of a tree lined bund wall which separates the site from local community (DALTON). Mobile plant is maintained in accordance with manufacturer's recommendation and a preventative maintenance schedule is in place. Silencers are fitted to exhausts to limit noise and operators are instructed to ensure engine covers are correctly in place. Noise levels are considered when new equipment is purchased.</p> <p>Noise from process operations is largely controlled by enclosure within buildings and the implementation of procedures to ensure that doors are opened only when necessary so that the noise is contained as much as possible.</p> <p>Complaints of noise from the local community are recorded and investigated to try to identify the source of the noise; if noise is attributed to an onsite source then action is taken to rectify the issue.</p>

BAT Conclusion No	Summary of BAT Conclusion requirement	Status NA/ CC / FC / NC	Assessment of the installation capability and any alternative techniques proposed by the operator to demonstrate compliance with the BAT Conclusion requirement
			BAT Conclusions for Sinter Plant
BAT conclusions 19 to 32 inclusive	This is not an integrated steel works. There is no sinter plant at the installation. Therefore, BAT Conclusions 19 to 32 inclusive are not relevant for this installation.	NA	BATC 19 to 32 not relevant.
BAT Conclusions for Pelletisation Plants			
BAT Conclusions 33 to 41 inclusive	There are no Pelletisation plants in the U.K. Therefore, BAT Conclusions 33 to 41 inclusive are not relevant for this installation.	NA	BATC 33 to 41 not relevant
BAT Conclusion for Coke Oven Plants			
BAT Conclusions 42-58 inclusive	There are no coke oven plants at the installation. Therefore, BAT Conclusions 42-58 inclusive are not relevant for this installation	NA	BATC 42 to 58 not relevant
BAT Conclusions for Blast Furnaces			
BAT Conclusions 59-74 inclusive	This is not an integrated steel works. There are no blast furnaces at the installation. Therefore, BAT Conclusions 59-74 inclusive are not relevant for this installation.	NA	BATC 59 to 74 not relevant

BAT Conclusion No	Summary of BAT Conclusion requirement	Status NA/ CC / FC / NC	Assessment of the installation capability and any alternative techniques proposed by the operator to demonstrate compliance with the BAT Conclusion requirement
BAT Conclusions for Basic Oxygen Steelmaking and Casting			
BAT Conclusions 75-89 inclusive	This is not an integrated steel works. No Basic Oxygen Steelmaking and Casting is undertaken at the installation. Therefore, BAT Conclusions 75-86 inclusive are not relevant for this installation	NA	BATC 75 to 89 not relevant
BAT Conclusions for Electric Arc Furnace Steelmaking and Casting			
90	<p>BAT for on-site slag processing is to reduce dust emissions by using one or a combination of the following techniques:</p> <ul style="list-style-type: none"> I. efficient extraction of the slag crusher and screening devices with subsequent off-gas cleaning, if relevant II. transport of untreated slag by shovel loaders III. extraction or wetting of conveyor transfer points for broken material IV. wetting of slag storage heaps V. use of water fogs when broken slag is loaded. <p>In the case of using BAT I, the BAT-associated emission level for dust is < 10 –</p>	CC	<p>BAT II-V is undertaken. Off gas cleaning in BAT I is not undertaken.</p> <p>BAT is achieved</p>

BAT Conclusion No	Summary of BAT Conclusion requirement	Status NA/ CC / FC / NC	Assessment of the installation capability and any alternative techniques proposed by the operator to demonstrate compliance with the BAT Conclusion requirement
	20 mg/Nm ³ , determined as the average over the sampling period (discontinuous measurement, spot samples for at least half an hour).		
91	BAT is to minimise the water consumption from the electric arc furnace (EAF) process by the use of closed loop water cooling systems for the cooling of furnace devices as much as possible unless once-through cooling systems are used.	NA	The EAF furnace is operated by Outokumpu. BAT 91 is not applicable
92	BAT is to minimise the waste water discharge from continuous casting	NA	Continuous casting is not undertaken on site. BAT 92 is not applicable.
93	This relates to production residues and specifically states that BAT is to prevent waste generation. It also makes reference to a number of techniques and BAT is to manage in a controlled manner EAF process residues which can neither be avoided nor recycled.	CC	All material taken to Harsco is recyclable.
94	BAT is to reduce energy consumption	NA	Continuous near net shape strip casting is not

BAT Conclusion No	Summary of BAT Conclusion requirement	Status NA/ CC / FC / NC	Assessment of the installation capability and any alternative techniques proposed by the operator to demonstrate compliance with the BAT Conclusion requirement
	by using continuous near net shape strip casting, if the quality and the product mix of the produced steel grades justify it.		undertaken product mix does not allow this to take place. BAT 94 is not applicable.
95	BAT is to reduce noise emissions from electric arc furnace (EAF) installations and processes in addition to using the techniques listed in BAT 18:	NA	The EAF's are operated by Outokumpu. BAT 95 is not applicable

Where relevant and appropriate, we have incorporated the techniques described by the Operator in their Regulation 60 Notice response as specific operating techniques required by the permit, through their inclusion in Table S1.2 of the Consolidated Variation Notice.

Annex 2: Review and assessment of changes that are not part of the BAT Conclusions derived permit review.

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

Aspect considered	Justification / Detail	Criteria met
		Yes
Receipt of submission		
Confidential information	A claim for commercial or industrial confidentiality has not been made.	✓
Identifying confidential information	We have not identified information provided as part of the variation application that we consider to be confidential. The decision was taken in accordance with our guidance on commercial confidentiality.	✓
Consultation		
Scope of consultation	The consultation requirements were identified and implemented. The decision was taken in accordance with RGN 6 High Profile Sites, our Public Participation Statement and our Working Together Agreements.	✓
Responses to consultation and web publicising	We received no responses to our web consultation	✓
The facility		
The regulated facility	A new listed activity has been added to Table S1.1 namely: Section 5.4 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	✓
European Directives		
Applicable directives	All applicable European directives have been considered in the determination of the application. The Industrial Emissions Directive came into force on the 6 January 2011, and was transposed in England and Wales law by an amendment to the Environmental Permitting Regulations in 2013.	✓

Aspect considered	Justification / Detail	Criteria met Yes
	<p>The purpose of the Directive is to achieve a high level of protection for the environment, taken as a whole, from the harmful effects of industrial activities. It does so by requiring each of the industrial installations listed in the Directive to comply with the best available techniques (BAT) and associated emission levels (AELs). Each sector will eventually have a BAT reference documents (Bref) published setting BAT and the AELs.</p> <p>An operator has four years from publication in the official journal to ensure they meet BAT and the AELs. However, Article 15(4) of the Directive does allow competent authorities to set less strict emission limit values providing certain criteria are met.</p> <p>The Bref for the Iron and Steel Industry was published in the official journal in March 2012. The industry now has until March 2016 to achieve BAT and the appropriate AEL's. In order to facilitate this process we served an EPR regulation 60 notice on Harsco that required the company to provide us with information on how they aim to achieve the new requirements.</p>	
The site		
Extent of the site of the facility	This is a multi operator installation and the plan includes the location of the other operators	✓
Site condition report	The operator has provided a description of the condition of the site. The operator has previously provided a description of the condition of the site. 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).	✓
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>This activity has operated for some years, there is no change in emissions</p> <p>We have not formally consulted on the application. The decision was taken in accordance with our guidance.</p>	✓

Aspect considered	Justification / Detail	Criteria met
		Yes
Environmental Risk Assessment and operating techniques		
Operating techniques	<p>We have reviewed the techniques used by the operator and compared these with the BATc set out through IED. Our decision can be viewed through this decision document.</p> <p>In respect of the new listed activity the treatment of slags and ashes. The proposed techniques/ emission levels for priorities for control are in line with the benchmark levels contained in the TGN "How to Comply with your Environmental Permit and the principles of S5.06 for hazardous and non hazardous waste operations and we consider them to represent appropriate techniques for the facility.</p>	✓
The permit conditions		
Updating permit conditions during consolidation.	<p>We have updated previous permit conditions to those in the new generic permit template as part of permit consolidation. The new conditions have the same meaning as those in the previous permit(s).</p> <p>The operator has agreed that the new conditions are acceptable.</p>	✓
Waste types	We have specified the permitted waste types, descriptions and quantities, which can be accepted at the regulated facility in Tables S2.2 of the permit.	✓
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 S1.2 in the permit.</p>	✓
Monitoring	We have decided that monitoring should be carried out for the parameters listed in the permit, using the methods detailed and to the frequencies specified. These are in line with the relevant BATc AEL and associated IED	✓

Aspect considered	Justification / Detail	Criteria met
		Yes
	requirements.	
Reporting	We have specified reporting in the permit. We made these decisions in accordance with BATc.	✓
Operator Competence		
Environment management system	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.	✓
Technical competence	Technical competency is required for activities permitted. The operator is a member of an agreed scheme.	✓