

Environment Agency permitting decisions

Variation

We have decided to issue the variation for Packington Composting Facility operated by SITA UK Limited.

The variation number is EPR/DP3892SG/V005

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.

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, web publicising responses

Key issues of the decision

This variation consolidates and updates the permit to modern conditions. It also changes the permit from a waste operation to an installation (newly prescribed biological treatment recovery activity) as a result of the Industrial Emissions Directive. The site has not changed its open windrow composting operations from those previously permitted. The operator originally applied to add a blending activity to the permit as part of this application but this request was withdrawn in an email by the operator on 28 March 2014.

Current BAT standards for the newly prescribed activity are Sector Guidance Note IPPC 5.06 and How to Comply. The facility meets the standards set out in the above technical guidance notes.

The operator also requested to add twelve additional waste types to undergo treatment by open windrow composting as part of the application. Eight of these wastes are included in our standard rules for composting or Compost Quality Protocol and are therefore considered suitable for composting providing they meet any restrictions that apply. Four waste types were considered bespoke which necessitated the need for further information to demonstrate suitability in the composting process. These four wastes were later revised to only one waste; 19 08 01 Urban Waste Water Screenings, which has been added to the permit under table S2.1. Information to demonstrate suitability was provided in accordance with the framework for assessing suitability of wastes going to anaerobic digestion, composting and biological treatment. The decision on this waste is covered in Annex 1 below.

Annex 1: decision checklist

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

Aspect considered	Justification / Detail	Criteria met
		Yes
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 web publicising	The web publicising responses (Annex 2) were taken into account in the decision. The decision was taken in accordance with our guidance.	✓
Operator		
Control of the facility	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.	✓
European Directives		
Applicable directives	All applicable European directives have been considered in the determination of the application. Waste Framework Directive Industrial Emissions Directive (IED)	✓
The site		
Extent of the site of the facility	The operator has provided a plan which we consider is satisfactory, showing the extent of the site of the facility. A plan is included in the permit and the operator is required to carry on the permitted activities within the site boundary.	✓
Biodiversity, Heritage, Landscape and Nature	The application is within the relevant distance criteria of a site of heritage, landscape or nature conservation, and/or protected species or habitat.	✓

Aspect considered	Justification / Detail	Criteria met
		Yes
Conservation	<p>A full assessment of the application and its potential to affect the sites and habitat has been carried out as part of the permitting process. We consider that the application will not affect the features of the site and habitat.</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		
Operating techniques	<p>We have reviewed the techniques used by the operator and compared these with the relevant guidance notes.</p> <ul style="list-style-type: none"> ➤ Sector Guidance Note IPPC 5.06 ➤ 'How to comply with your Environmental Permit' ➤ Framework for assessing suitability of wastes going to anaerobic digestion, composting and biological treatment. ➤ Guidance on the evaluation of bioaerosol risk assessments for composting facilities. ➤ A standardised protocol for the monitoring of bioaerosols at open composting facilities. ➤ Position statement - Composting and potential health effects from bioaerosols. <p>Waste pre-acceptance, acceptance and storage are all as specified in SGN IPPC 5.06.</p> <p>Fugitive emissions for this facility are bioaerosols, dust and odour. The operator has produced an amended Odour Management Plan (OMP) due to the nature of the additional waste type. This is in accordance with our H4 odour management guidance and 'How to comply' which is referenced in the permit.</p> <p>Bioaerosols are monitored in accordance with the Industry Standardised Protocol and Guidance on the evaluation of bioaerosol risk assessments for composting facilities.</p> <p>Dust is monitored quarterly in accordance with our M17 guidance. This is specified in the sites management plan and is referenced in table S1.2.</p>	✓

Aspect considered	Justification / Detail	Criteria met Yes
	<p>Operations are carried out on an impermeable pavement with sealed drainage system feeding to a sealed lagoon.</p> <p>Bespoke waste 19 08 01 Urban Waste Water Treatment screenings, has been assessed and accepted as appropriate for recovery by biological treatment in accordance with the framework for assessing suitability of wastes going to anaerobic digestion, composting and biological treatment. The output from the treatment of this waste is considered a compost like output and cannot be applied to agricultural land.</p> <p>The proposed techniques/emission levels for priorities for control are in line with the benchmark levels contained in the TGN and we consider them to represent appropriate techniques for the facility. The permit conditions ensure compliance with relevant BREFs and BAT Conclusions, and ELVs deliver compliance with BAT-EALs.</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	<p>We have specified the permitted waste types, descriptions and quantities, which can be accepted at the regulated facility as follows:</p> <p>Standard wastes added to the permit: 03 03 11, 19 05 03, 19 05 99, 19 06 04, 19 06 06, 19 08 02, 19 08 01, 19 08 05 and 20 01 38.</p> <p>We are satisfied that the operator can accept these wastes for the following reasons:</p> <ul style="list-style-type: none"> The wastes are considered suitable for recovery by a biological treatment process. Restrictions have been applied in accordance with industry 	✓

Aspect considered	Justification / Detail	Criteria met Yes
	<p>standards as specified in table S1.1 and S1.2.</p> <p>Bespoke waste 19 08 01 Urban Waste Water Treatment screenings, has been assessed and accepted as appropriate for recovery by biological treatment in accordance with the framework for assessing suitability of wastes going to anaerobic digestion, composting and biological treatment. The output from the treatment of this waste is considered a compost like output and cannot be applied to agricultural land.</p> <p>We made these decisions with respect to waste types in accordance with the framework for assessing the suitability of wastes going to anaerobic digestion, composting and biological treatment and operational instruction - Supplementary guidance for the assessment of new or novel waste streams for composting and anaerobic digestion facility permits.</p> <p>The proposed techniques/emission levels for priorities for control are in line with the benchmark levels contained in the TGN and we consider them to represent appropriate techniques for the facility.</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>	✓
Emission limits	<p>We have decided that emission limits should be set for the parameters listed in the permit.</p> <p>The following substances have been identified as being emitted in significant quantities and ELVs or equivalent parameters or technical measures have been set for those substances.</p> <ul style="list-style-type: none"> • Total bacteria - 1000cfu/m³ • <i>Aspergillus fumigatus</i> - 500 cfu/m³ 	✓

Aspect considered	Justification / Detail	Criteria met
		Yes
	<p>These limits are set in accordance with 'Guidance on the evaluation of bioaerosol risk assessments for composting facilities'.</p>	
Monitoring	<p>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.</p> <p>These monitoring requirements have been imposed in order to continue to monitor the composting process and release of bioaerosols.</p> <p>Bi-annual bioaerosol monitoring is currently carried out at the facility. This frequency has been maintained in this consolidation. Process monitoring is a standard requirement for all composting operations.</p> <p>We made these decisions in accordance with our position statement 'Composting and potential health effects from bioaerosols' and 'Guidance on the evaluation of bioaerosol risk assessments for composting facilities'.</p>	✓
Reporting	<p>We have specified reporting in the permit.</p> <p>Bi annual reporting is required to maintain the assessment of bioaerosol emissions from this facility. This frequency has been agreed as appropriate as the facility is already operational and has been monitoring for some years.</p> <p>We made these decisions in accordance with Guidance on the evaluation of bioaerosol risk assessments for composting facilities.</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>	✓

Annex 2: Web publicising

Summary of responses to web publication and the way in which we have taken these into account in the determination process. (Newspaper advertising is only carried out for certain application types, in line with our guidance.)

Response received from
No responses were received
Brief summary of issues raised
None
Summary of actions taken or show how this has been covered
No action to be taken