

# Notice of variation with introductory note

Environmental Permitting (England & Wales) Regulations 2010

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Tradebe Fawley Limited

Tradebe Fawley HTI  
Charlestone Road  
Hardley  
Hythe  
Southampton  
SO45 3NX

Variation application number  
EPR/FP3935KL/V005

Permit number  
EPR/FP3935KL

# **Tradebe Fawley HTI**

## **Permit number EPR/FP3935KL**

### **Introductory note**

#### **This introductory note does not form a part of the notice**

The following notice gives notice of the variation of an environmental permit.

This variation is to amend condition 2.1.19, add condition 2.1.20 and remove Schedule 7 from the permit. This variation will allow the site to use those permitted wastes that comply with condition 2.1.19 in the auxiliary burner. This will result in wastes with high calorific value to being used to maintain required temperatures in the combustion chamber when burning low calorific wastes.

This variation incorporates the changes required by the Industrial Emissions Directive. This includes the amendment of the wording of several permit conditions relating to notifications, and also includes the addition of a condition relating to a requirement for monitoring of groundwater and soil.

The schedules specify the changes made to the original permit.

The status log of a permit sets out the permitting history, including any changes to the permit reference number.

**Status log of the permit**

<b>Description</b>	<b>Date</b>	<b>Comments</b>
Application ZP3632SR	31/03/05	
Request for additional air quality monitoring data	Request dated 20/09/05	Response received 10/11/05 Additional response received 16/11/05
Request for additional information	Request dated 08/11/05	Response dated 11/11/05
Response to request for information Schedule 4	Request dated 14/11/05	Response dated 22/11/05 (Part) Response dated 01/12/05 (Part)
Supplementary Information	Response received 23/11/05	
Request for information by e-mail for information on the mobile scrubber	Request dated 08/12/05	Response dated 09/12/05
Permit ZP3632SR determined	21/12/05	
Variation Application EPR/ZP3632SR/V002	14/12/06	
Application to transfer EPR/HP3835UZ/T001 permit from Veolia ES Onyx Ltd to Pyros Environmental Ltd	Received 05/03/07	
Transfer determined EPR/HP3835UZ	02/05/07	Permit transferred to Pyros Environmental Limited
Transfer application EPR/FP3935KL/T001 (full transfer of permit EPR/HP3835UZ)	Duly made 15/07/07	
Transfer determined EPR/FP3935KL	17/07/09	Permit transferred to Willacy Guinard Holdings Limited as permit EPR/FP3935KL
Administrative variation EPR/FP3935KL/V002 issued	24/03/10	Name change of Willacy Guinard Holdings Limited to Tradebe Fawley Limited
Variation application EPR/FP3935KL/V003	Duly made 12/08/11	
Variation application EPR/FP3935KL/V003 determined	03/10/11	
Variation application EPR/FP3935KL/V004	Received 20/06/14	
Variation application Operator withdrawn	16/07/14	
Variation application EPR/FP3935KL/V005	Duly made 25/07/14	Application to remove condition 2.1.19 and Schedule 7

Variation application EPR/FP3935KL/V005 determined	17/10/14	Conditions 2.1.19 amended, 2.1.20 added, Schedule 7 removed and permit updated with regards to IED
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End of introductory note

## Notice of variation

Environmental Permitting (England and Wales) Regulations 2010

The Environment Agency in exercise of its powers under regulation 20 of the Environmental Permitting (England and Wales) Regulations 2010 varies

**Permit number**  
**EPR/FP3935KL**

**issued to:**  
**Tradebe Fawley Limited** (“the operator”)

whose registered office is

**Whittle Close Engineer Park**  
**Sandycroft**  
**Deeside**  
**Flintshire**  
**CH5 2QE**

company registration number 02786680

to operate a regulated facility at

**Fawley High Temperature Incinerator**  
**Charleston Road**  
**Hardley**  
**Hythe**  
**Southampton**  
**SO45 3NX**

to the extent set out in the schedules.

The notice shall take effect from 17/10/14

Name	Date
<b>A.J. Nixon</b>	<b>17 October 2014</b>

Authorised on behalf of the Environment Agency

## Schedule 1 – conditions to be deleted

The following conditions are deleted as a result of the application made by the operator

Schedule 7 – R Code Waste (as shown in permit HP3835UZ)

## Schedule 2 – conditions to be amended

The following conditions are amended as detailed, following an Environment Agency initiated variation in line with the requirements of the Industrial Emissions Directive (IED)

Condition 1.1.1 is amended as follows

- 1.1.1 The Operator is authorised to carry out the activities and the associated activities specified in Table 1.1.1.

**Table 1.1.1 - Permitted Activities**

<b>Activity listed in Schedule 1 of the PPC Regulations or Directly- Associated Activity</b>	<b>Description of specified activity</b>	<b>Limits of specified activity</b>
Section 5.1A(1)(a) : Incineration of hazardous waste in an incineration plant	The incineration of hazardous waste in a waste incineration plant or waste co-incineration plant with a capacity exceeding 10 tonnes per day	Receipt of waste, through storage, pre-treatment, waste fuel and air supply systems, on-site facilities for the treatment or storage of residues and waste water, stack devices and systems for controlling incineration operations, recording and monitoring incineration conditions.

Condition 5.1.1 and 5.1.2 as follows:

- 5.1.1 (a) In the event that the operation of the activities gives rise to an incident or accident which significantly affects or may significantly affect the environment, the operator must immediately—
- (i) inform the Environment Agency,
  - (ii) take the measures necessary to limit the environmental consequences of such an incident or accident, and
  - (iii) take the measures necessary to prevent further possible incidents or accidents;

- (b) In the event of a breach of any permit condition the operator must immediately—
    - (i) inform the Environment Agency, and
    - (ii) take the measures necessary to ensure that compliance is restored within the shortest possible time;
  - (c) In the event of a breach of permit condition which poses an immediate danger to human health or threatens to cause an immediate significant adverse effect on the environment, the operator must immediately suspend the operation of the activities or the relevant part of it until compliance with the permit conditions has been restored.
- 5.1.2 Any information provided under condition 5.1.1 (a)(i), or 5.1.1 (b)(i) where the information relates to the breach of a limit specified in the permit, shall be confirmed by sending the information listed in schedule 1 to this permit within the time period specified in that schedule.

Schedule 1 as follows:

## Schedule 1 - Notification

These pages outline the information that the operator must provide.

Units of measurement used in information supplied under Part A and B requirements shall be appropriate to the circumstances of the emission. Where appropriate, a comparison should be made of actual emissions and authorised emission limits.

**If any information is considered commercially confidential, it should be separated from non-confidential information, supplied on a separate sheet and accompanied by an application for commercial confidentiality under the provisions of the EP Regulations.**

### Part A

Permit Number	
Name of operator	
Location of Facility	
Time and date of the detection	

**(a) Notification requirements for any malfunction, breakdown or failure of equipment or techniques, accident, or emission of a substance not controlled by an emission limit which has caused, is causing or may cause significant pollution**

**To be notified within 24 hours of detection**

Date and time of the event	
Reference or description of the location of the event	
Description of where any release into the environment took place	
Substances(s) potentially released	
Best estimate of the quantity or rate of release of substances	
Measures taken, or intended to be taken, to stop any emission	
Description of the failure or accident.	

**(b) Notification requirements for the breach of a limit**

**To be notified within 24 hours of detection unless otherwise specified below**

Emission point reference/ source	
Parameter(s)	
Limit	
Measured value and uncertainty	
Date and time of monitoring	
Measures taken, or intended to be taken, to stop the emission	



Time periods for notification following detection of a breach of a limit	
Parameter	Notification period

(c) Notification requirements for the detection of any significant adverse environmental effect	
To be notified within 24 hours of detection	
Description of where the effect on the environment was detected	
Substances(s) detected	
Concentrations of substances detected	
Date of monitoring/sampling	

### Part B - to be submitted as soon as practicable

Any more accurate information on the matters for notification under Part A.	
Measures taken, or intended to be taken, to prevent a recurrence of the incident	
Measures taken, or intended to be taken, to rectify, limit or prevent any pollution of the environment which has been or may be caused by the emission	
The dates of any unauthorised emissions from the facility in the preceding 24 months.	

### Part C

<b>Permit Number</b>	
<b>Name of Operator</b>	
<b>Location of Installation</b>	

For multi-line plants, indicate which line(s) was (were) subject to abnormal operation.	
Time at which abnormal operation commenced	
Time at which abnormal operation ceased	
Duration of this incidence of abnormal operation	
Cumulative abnormal operation duration in current year (at end of present incidence)	
Reasons for abnormal operation	
How did the abnormal operation end? (e.g. plant repaired, reaching maximum permitted duration, initiation of shutdown, etc.)	
Where the abnormal operation was caused by the failure of the particulate, CO or TOC CEM, attach a copy of the alternate monitoring data which was used to demonstrate compliance with the abnormal operation emission limit values.	

Where abatement plant has failed, give the half-hourly average emissions for pollutants of relevance during the abnormal operation in the rows below								
Pollutant	1 <sup>st</sup> ½ hour	2 <sup>nd</sup> ½ hour	3 <sup>rd</sup> ½ hour	4 <sup>th</sup> ½ hour	5 <sup>th</sup> ½ hour	6 <sup>th</sup> ½ hour	7 <sup>th</sup> ½ hour	8 <sup>th</sup> ½ hour

<b>Name*</b>	
<b>Post</b>	
<b>Signature</b>	
<b>Date</b>	

\* authorised to sign on behalf of the operator

The following conditions are amended as a result of the application made by the operator

Table 2.1.1 as follows:

<b>Table 2.1.1: Operating techniques</b>		
<b>Description</b>	<b>Parts</b>	<b>Date Received</b>
Application	The response to questions 2.1, 2.2 and 2.10 and given in pages 221- 228 of the Application	31/05/05
Response to Schedule 4 Notice	The response to questions 1,3,4,6,7, 11-18, 25, 28-35, 38, 41-43, 45 and 49	22/11/05 and 01/12/05
Response to e-mail dated 8/12/05	Entire e-mail	9/12/05
Variation application EPR/FP3935KL/V 003	- Response to 'Section 3 – Operating Techniques' of the Part C3 application form, (EPC3)	23/06/11
	- Supporting Drawing PD5/000/4767 (document EAV CD 10 5)	23/06/11
	- Supporting Risk Assessment (document EAV CD 10 06)	28/07/11
	- Supporting document 'Detailed Summary of Changes' – Cooling Tower change over (document EAV CD 10 1)	12/08/11
Variation application EPR/FP3935KL/V 005	- Response to 'Section 3 – Operating Techniques' of the Part C3 application form, (EPC3)	25/07/14
	- Responses to 'Appendix 6 – Specific Questions for the waste incineration sector' of the Part CS application form, (EPC3)	25/07/14
	- Supporting document 'Justification for the addition of 15 new EWC codes to the Tradebe Fawley HTI permit'	25/07/14

Condition 2.1.19 as follows:

- 2.1.19 without prejudice to 2.1.8 and provided the temperature specified in condition 2.1.7 is maintained in the combustion chamber, pumpable liquid wastes with a calorific value of > 21MJ/kg may be used in the auxiliary burner.

Condition 4.1.2 and so Table S2: Reporting of monitoring data as follows:

**Table S2: Reporting of monitoring data**

Parameter	Emission point	Reporting period	Period begins
Sulphur dioxide mg m <sup>-3</sup>	A1	Every 6 months (periodic)	1 <sup>st</sup> January
		Every month (continuous)	
Total Organic Carbon (TOC) mg m <sup>-3</sup>	A1	Every 6 months (periodic)	1 <sup>st</sup> January
		Every month (continuous)	
Oxides of nitrogen mg m <sup>-3</sup>	A1	Every 6 months (periodic)	1 <sup>st</sup> January
		Every month (continuous)	
Gaseous chlorides as HCl mg m <sup>-3</sup>	A1	Every 6 months (periodic)	1 <sup>st</sup> January
		Every month (continuous)	
Gaseous fluorides as HF mg m <sup>-3</sup>	A1	Every 6 months	1 <sup>st</sup> January
Particulate Matter mg m <sup>-3</sup>	A1	Every 6 months (periodic)	1 <sup>st</sup> January
		Every month (continuous)	
Carbon Monoxide mg m <sup>-3</sup>	A1	Every 6 months (periodic)	1 <sup>st</sup> January
		Every month (continuous)	
Cadmium & Thallium and their compounds (total)	A1	Every 6 months	1 <sup>st</sup> January
Mercury and its compounds	A1	Every 6 months	1 <sup>st</sup> January
Antimony, Arsenic, Lead, Chromium, Cobalt, Copper, Manganese, Nickel and Vanadium and their compounds (total)	A1	Every 6 months	1 <sup>st</sup> January
Dioxins / furans (I-TEQ)	A1	Every 6 months.	1 <sup>st</sup> January
Dioxins / furans(WHO-TEQ Humans / Mammals)	A1	Every 6 months.	1 <sup>st</sup> January
Dioxins / furans (WHO-TEQ Fish)	A1	Every 6 months.	1 <sup>st</sup> January
Dioxins / furans (WHO-TEQ Birds)	A1	Every 6 months.	1 <sup>st</sup> January
Dioxin-like PCBs (WHO-TEQ)	A1	Every 6	1 <sup>st</sup> January

**Table S2: Reporting of monitoring data**

Parameter	Emission point	Reporting period	Period begins
Humans / Mammals)		months.	
Dioxin-like PCBs (WHO-TEQ Fish)	A1	Every 6 months.	1 <sup>st</sup> January
Dioxin-like PCBs (WHO-TEQ Birds)	A1	Every 6 months.	1 <sup>st</sup> January
Poly-cyclic aromatic hydrocarbons (PAHs)	A1	Every 6 months.	1 <sup>st</sup> January
Cadmium and its compounds as Cd	W1	Every 3 months	1 <sup>st</sup> January
Mercury and its compounds as Hg	W1	Every 3 months	1 <sup>st</sup> January
Chromium and its compounds as Cr	W1	Every 3 months	1 <sup>st</sup> January
Copper and its compounds as Cu	W1	Every 3 months	1 <sup>st</sup> January
Nickel and its compounds as Ni	W1	Every 3 months	1 <sup>st</sup> January
Lead and its compounds as Pb	W1	Every 3 months	1 <sup>st</sup> January
Zinc and its compounds as Zn	W1	Every 3 months	1 <sup>st</sup> January
Aluminium and its compounds as Al	W1	Every 3 months	1 <sup>st</sup> January
Iron and its compounds as Fe	W1	Every 3 months	1 <sup>st</sup> January
Arsenic and its compounds expressed as As	W1	Every 3 months	1 <sup>st</sup> January
Thallium and its compounds expressed as Tl	W1	Every 3 months	1 <sup>st</sup> January
Cadmium and thallium and their compounds, expressed as their respective elements taken together	W1	Every 3 months	1 <sup>st</sup> January
Antimony, arsenic, lead, chromium, cobalt, copper, manganese, nickel, vanadium, tin and their compounds expressed as their respective elements taken together.	W1	Every 3 months	1 <sup>st</sup> January
Total Ammoniacal N	W1	Every 3 months	1 <sup>st</sup> January
Phosphate as P	W1	Every 3 months	1 <sup>st</sup> January
pH range	W1	Every 3 months	1 <sup>st</sup> January
Temperature	W1	Every 3 months	1 <sup>st</sup> January
Flow rate	W1	Every 3 months	1 <sup>st</sup> January
Total Cyanide as CN	W1	Every 3 months	1 <sup>st</sup> January
Total Phenols	W1	Every 3 months	1 <sup>st</sup> January
Fluoride	W1	Every 3 months	1 <sup>st</sup> January
Chemical Oxygen Demand	W1	Every 3 months	1 <sup>st</sup> January
BOD	W1	Every 3 months	1 <sup>st</sup> January
Oil Content	W1	Every 3 months	1 <sup>st</sup> January
Suspended solids	W1	Every 3 months	1 <sup>st</sup> January

**Table S2: Reporting of monitoring data**

Parameter	Emission point	Reporting period	Period begins
1,2-Dichloroethane	W1	Every 3 months	1 <sup>st</sup> January
Aldrin	W1	Every 6 months	1 <sup>st</sup> January
Atrazine	W1	Every 6 months	1 <sup>st</sup> January
Azinphos-methyl	W1	Every 6 months	1 <sup>st</sup> January
Dichlorvos	W1	Every 6 months	1 <sup>st</sup> January
Dieldrin	W1	Every 6 months	1 <sup>st</sup> January
Endosulfan	W1	Every 6 months	1 <sup>st</sup> January
Endrin	W1	Every 6 months	1 <sup>st</sup> January
Fenitrothion	W1	Every 6 months	1 <sup>st</sup> January
Hexachlorobenzene	W1	Every 6 months	1 <sup>st</sup> January
Hexachlorobutadiene	W1	Every 6 months	1 <sup>st</sup> January
Hexachlorocyclohexane (All isomers)	W1	Every 6 months.	1 <sup>st</sup> January
Malathion	W1	Every 6 months.	1 <sup>st</sup> January
PCBs (Polychlorinated biphenyls)	W1	Every 6 months.	1 <sup>st</sup> January
Pentachlorophenol and its compounds	W1	Every 6 months.	1 <sup>st</sup> January
Simazine	W1	Every 6 months.	1 <sup>st</sup> January
DDT (All isomers)	W1	Every 6 months	1 <sup>st</sup> January
Tribuyl tin and triphenyl tin taken together	W1	Every 6 months	1 <sup>st</sup> January
Trichlorobenzene (All isomers)	W1	Every 6 months	1 <sup>st</sup> January
Trifluralin	W1	Every 6 months	1 <sup>st</sup> January
Azinphos-ethyl	W1	Every 6 months	1 <sup>st</sup> January
Carbon tetrachloride	W1	Every 6 months	1 <sup>st</sup> January
Chloroform	W1	Every 6 months	1 <sup>st</sup> January
Fenthion	W1	Every 6 months	1 <sup>st</sup> January
Parathion	W1	Every 6 months	1 <sup>st</sup> January
Parathion-methyl	W1	Every 6 months	1 <sup>st</sup> January
Tetrachloroethylene	W1	Every 6 months.	1 <sup>st</sup> January
Isodrin	W1	Every 6 months.	1 <sup>st</sup> January
1,1,1 trichloroethane	W1	Every 6 months.	1 <sup>st</sup> January
Trichloroethylene	W1	Every 6 months.	1 <sup>st</sup> January
Dioxins and Dibenzofurans expressed as I-TEQ	W1	Every 6 months.	1 <sup>st</sup> January
Dioxins / furans (WHO-TEQ)	W1	Every 6	1 <sup>st</sup> January

**Table S2: Reporting of monitoring data**

Parameter	Emission point	Reporting period	Period begins
Humans / Mammals)		months.	
Dioxins / furans (WHO-TEQ Fish)	W1	Every 6 months.	1 <sup>st</sup> January
Dioxins / furans (WHO-TEQ Birds)	W1	Every 6 months.	1 <sup>st</sup> January
Metals (Cadmium, Thallium, Mercury, Lead, Chromium, Copper, Manganese, Nickel, Arsenic, Cobalt, Vanadium, Zinc) and their compounds, dioxins/furans and dioxin-like PCBs.	Incinerator slag	Every 6 months.	1 <sup>st</sup> January
Total soluble fraction and metals (Cadmium, Thallium, Mercury, Lead, Chromium, Copper, Manganese, Nickel, Arsenic, Cobalt, Vanadium, Zinc) soluble fractions	Incinerator slag	Before use of a new disposal or recycling route	1 <sup>st</sup> January
TOC	Incinerator slag	Monthly	1 <sup>st</sup> January
LOI (Alternative to TOC)	Incinerator slag	Monthly	1 <sup>st</sup> January
Metals (Cadmium, Thallium, Mercury, Lead, Chromium, Copper, Manganese, Nickel, Arsenic, Cobalt, Vanadium, Zinc) and their compounds, dioxins/furans and dioxin-like PCBs.	Filter Cake	Every 6 months.	1 <sup>st</sup> January
Total soluble fraction and metals (Cadmium, Thallium, Mercury, Lead, Chromium, Copper, Manganese, Nickel, Arsenic, Cobalt, Vanadium, Zinc) soluble fractions	Filter Cake	Before use of a new disposal or recycling route	1 <sup>st</sup> January
Metals (Cadmium, Thallium, Mercury, Lead, Chromium, Copper, Manganese, Nickel, Arsenic, Cobalt, Vanadium, Zinc) and their compounds, dioxins/furans and dioxin-like PCBs.	Other solid residues Furnace brick work - contaminated by combustion products	Every 6 months.	1 <sup>st</sup> January
Total soluble fraction and metals (Cadmium, Thallium, Mercury, Lead, Chromium, Copper, Manganese, Nickel, Arsenic, Cobalt, Vanadium, Zinc) soluble fractions	Other solid residues Furnace brick work - contaminated	Before use of a new disposal or recycling route	1 <sup>st</sup> January

**Table S2: Reporting of monitoring data**

Parameter	Emission point	Reporting period	Period begins
	by combustion products		
Water usage	Installation	Every 12 months	1 <sup>st</sup> January
Energy usage	Installation	Every 12 months	1 <sup>st</sup> January
Waste disposal and/or recovery.	Installation	Every 12 months	1 <sup>st</sup> January
Performance Indicators	Installation	Every 12 months	1 <sup>st</sup> January
Auxiliary Burner	Installation	Every 12 months	1 <sup>st</sup> January

Condition 4.1.2 and so Table S3: Reporting Forms as follows:

**Table S3: Reporting Forms**

Media or parameter	Form Number	Date of Form
Air: Periodic monitored emissions biannually	Agency Form /HP3835UZ/A1 /March 2007	March 2007
Air: Continuously monitored emissions of particulates	Agency Form /HP3835UZ/A2 /March 2007	March 2007
Air: Continuously monitored emissions of Hydrogen chloride	Agency Form /HP3835UZ/A3 /March 2007	March 2007
Air: Continuously monitored emissions of TOC	Agency Form /HP3835UZ/A4 /March 2007	March 2007
Air: Continuously monitored emissions of carbon monoxide	Agency Form /HP3835UZ/A6 /March 2007	March 2007
Air: Continuously monitored emissions of Sulphur dioxide	Agency Form /HP3835UZ/A7 /March 2007	March 2007
Air: Continuously monitored emissions of Oxides of nitrogen	Agency Form /HP3835UZ/A8 /March 2007	March 2007
Water: monitoring data	Agency Form /HP3835UZ/W1 /March 2007	March 2007
Water: monitoring data	Agency Form /HP3835UZ/W2 /March 2007	March 2007
Water: monitoring data	Agency Form /HP3835UZ/W3/March 2007	March 2007
Incinerator slag, Filter Cake Residues, Other solid residues: Composition	Agency Form /HP3835UZ/Ash1 /March 2007	March 2007
Incinerator slag, Filter	Agency Form /HP3835UZ/Ash2 /March 2007	March 2007



Cake Residues, Other solid residues: Solubility		
Energy	Agency Form /HP3835UZ/E1 /March 2007	March 2007
Waste Return	Agency Form /HP3835UZ/R1 /March 2007	March 2007
Water usage	Agency Form /HP3835UZ/WU1 /March 2007	March 2007
Performance indicators	Agency Form /HP3835UZ/PI1 /March 2007	March 2007
Auxiliary Burner	Agency Form/ FP3935KL/Auxiliary1/October 2014	October 2014

### Schedule 3 – conditions to be added

The following conditions are added following an Environment Agency initiated variation in line with the requirements of the Industrial Emissions Directive (IED)

Condition 2.10.13 as follows:

2.10.13 Periodic monitoring shall be carried out at least once every 5 years for groundwater and 10 years for soil, unless such monitoring is based on a systematic appraisal of the risk of contamination.

To condition 6.1.1 as follows:

*“Industrial Emissions Directive”* means DIRECTIVE 2010/75/EU OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 24 November 2010 on industrial emissions

The following conditions are added as a result of the application made by the operator

Condition 2.1.20 as follows:

2.1.20 The operator shall record the Waste Code, calorific value and the quantity of each waste used under condition 2.1.19