

# **Environment Agency permitting decisions**

## **Variation**

We have decided to issue the variation for Knowsley Waste Facility operated by Hydrodec (UK) Limited.

The variation number is EPR/SP3130EK/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

## **Key issues of the decision**

### **Industrial Emissions Directive (IED)**

The IED requires several activities previously regulated at this site as waste activities to become part A installations. These are:

- The treatment of hazardous waste by physico-chemical treatment in a facility exceeding 10 tonnes per day - crushing and shredding filters and fluorescent tubes (Section 5.3 A(1) (a) (ii)).
- Repackaging over 10 tonnes per day of hazardous waste prior to the submission for recovery or disposal - the repackaging of hazardous wastes and the bulk storage of waste oil and antifreeze and coolant prior to transferring it to another site for recovery or disposal (Section 5.3 A(1) (a) (iv)).
- The temporary storage of over 50 tonnes per day of hazardous waste; though previously permitted, this only covered waste oil and oily water storage, not the other hazardous garage service waste that the site accepts (Section 5.6 A(1) (a)).

Table S1.1 in the permit has been updated to reflect these changes.

As part of this variation the permit has been consolidated and updated to modern conditions that take into account the requirements of IED.

### **Environmental Risk**

The environmental risk of the following scheduled activities needs to be assessed:

- crushing metal containers and fluorescent tubes.
- shredding oil filters
- Repackaging over 10 tonnes per day of hazardous waste prior to the submission for recovery or disposal
- The temporary storage of over 50 tonnes per day of hazardous garage service waste.

#### **Emissions to air**

The site has 11 point source emissions to air, ten from waste antifreeze or oil storage tanks, and one from the nitrogen purge associated with the shredding activity. The only emission from the nitrogen purge is nitrogen which should not have a negative environmental impact. Emissions to air from the waste antifreeze and oil tanks will occur when the tanks are being emptied or filled and the air from the headspace of the tank or tanker is displaced through the vents. We would not normally expect a quantitative risk assessment from this type of emission. We do not consider it likely to cause a negative environmental impact, due to the emissions being periodic and the low volatility of the materials being stored.

A H1 risk assessment has been undertaken to assess if the waste oil tanks will cause emissions which exceed any Environmental Assessment Levels (EALs). For the three compounds which have prescribed EALs, emissions screen out as being insignificant.

We do not consider the emissions to air from the storage of antifreeze and oil likely to have a negative impact on the environment.

#### Emissions to sewer

The applicant has a trade effluent consent in place with United Utilities and all site drainage discharges to sewer for treatment at a waste water treatment works. An interceptor is in place to minimise the emission of oil to sewer. The operator undertook a H1 risk assessment using the maximum emission limits from the trade effluent consent. This indicates that emissions of cyanide, lead and sulphate cannot be ruled out as insignificant. However, the operator has highlighted that the discharge consent covers oil recycling, which is no longer undertaken at the site, therefore the emissions of pollutants is expected to be within the limits set in the trade effluent consent.

We are satisfied that the emission of pollutants to sewer will be adequately controlled by the trade effluent consent.

#### Containment

The site surfacing is impervious. Waste oil is stored within a bunded area which has a capacity of 25% of the total volume stored and an additional freeboard allowance which was confirmed by a qualified structural engineer. The shredding system is within a building which has gullies and a bund to prevent liquid release. Site infrastructure is inspected daily.

An emergency action plan is in place which details how the environment will be protected in the event of fire, spillages and flooding.

#### Noise

The operator has indicated in their application that the main noise sources are from vehicle movements and container movements. The operator has stated that no noise complaints have been received at the site, and as the activities are unchanging, it is unlikely that this site will have a negative effect on local noise levels.

#### Odour

The waste oil handled on site has a low vapour pressure which means that odours are not generally released. However, odour may be generated from the movement or any spillages of waste oil, as well as any sumps or from oil filters. Odour may also be generated from the removal of sludge from the oil tanks which occurs periodically. The operator has said that, if necessary, a scrubbing system can be used on the vacuum tanker discharge to abate odour. The operator has highlighted in their application that no odour



**Table 1 Comparison of Indicative BAT with key measures proposed by the operator**

<i>Indicative BAT</i>	<i>Key measures proposed</i>
<p><i>the Operator should in every case obtain representative sample(s) of the waste from the production process/current holder and compare it against the written description to ensure that it is consistent.</i></p> <p><i>Wastes should not be accepted at the installation without a clear method or defined treatment and disposal route being determined in advance and costed before the waste is accepted at the installation.</i></p> <p><i>There must be a clear distinction between sales and technical staff roles and responsibilities. If non-technical sales staff are involved in waste disposal enquiries, then a final technical assessment prior to approval should be made. It is this final technical checking that should be used to avoid build-up of accumulations of wastes.</i></p>	<p>compare them against the written description, apart from flammable wastes such as waste fuels and solvent based waste, where the storage containment and labelling is checked.</p> <p>The operator has confirmed that waste is not accepted without a defined treatment route</p> <p>The operator has confirmed that technical queries will be dealt with by technical staff.</p>
<p><b>Waste acceptance procedures section 2.1.2</b>  <i>Visual inspection. Where possible, confirmatory checks should be undertaken before offloading where safety is not compromised. Inspection must in any event be carried out immediately upon offloading at the installation.</i></p>	<p>The operator has detailed that wastes arriving in drums, wheeled bins, kegs and crates are inspected before being collected. The operator uses olfactory and visual techniques to verify the specific waste streams that can be accepted under the permit.</p>
<p><b>Waste storage and infrastructure section 2.1.3</b>  <i>Bulk storage vessels should be located on an impervious surface that is resistant to material being stored, with sealed construction joints within a bunded area with a capacity at least 110% of the largest vessel or 25% of the total tankage volume, whichever is the greater.</i>  <i>As a general rule, no open-topped tanks, vessels or pits should be used for storage or treatment of hazardous</i></p>	<p>The operator has confirmed that the bund volume is 25% of the total contents stored, and site surfacing is impervious.</p> <p>None of the tanks are open-topped.</p>

**Table 1 Comparison of Indicative BAT with key measures proposed by the operator**

<i>Indicative BAT</i>	<i>Key measures proposed</i>
<p><i>or liquid wastes.</i></p> <p><i>Storage within the reception area should be for a maximum of five working days. Following receipt, wastes should be treated or removed off-site as soon as possible. The total storage time will depend upon the characteristics of a particular site and the waste types being stored. For example, on a site in a sensitive location handling hazardous wastes, it may be appropriate to limit storage times to one month. Other non-hazardous wastes, however, may be held on-site for longer periods. However, all waste should be treated or removed off site within a maximum of six months from the date of receipt.</i></p>	<p>The operator has confirmed that waste will only be stored in the reception area for five days and all wastes will be treated or removed from the site within 6 months.</p>
<p><b>Waste treatment section 2.1.4</b>  <i>All treatment/reaction vessels should be enclosed and should be vented to atmosphere via an appropriate scrubbing and abatement system (subject to explosion relief).</i></p>	<p>The crushing equipment used to treat florescent tubes uses a recycled air filtration system to minimise mercury vapour emissions.</p> <p>Shredding is carried out under a nitrogen blanket that is vented to atmosphere. The unit has two exhaust extracts, and the extract is treated via an oil mist filter and a smoke and dust filter to a level that is sufficient to allow re-circulation of the air back into the building.</p>

## Partial surrender

Three activities are surrendered as part of this variation. These activities have never commenced at this site. The activities are:

- Oil processing-listed activity 1.1 B (b) (iii) burning recovered oil;
- The directly associated activity storage of effluent from oil processing;
- The recycling and reclamation of waste antifreeze waste activity.

These activities have been removed from the consolidated permit. No land is being surrendered as part of this determination; only the activities are being surrendered. The condition of the land where the above activities have taken

place has not been assessed during this determination. It will be considered at the time the land is surrendered.

## 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
<b>Consultation</b>		
Scope of consultation	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.	✓
Responses to web publicising	<p>The web publicising responses (Annex 2) were taken into account in the decision.</p> <p>The application was publicised on our website from 5 February 2015 to 6 March 2015, no comments on the application were received in response to the publication.</p> <p>The decision was taken in accordance with our guidance.</p>	✓
<b>Operator</b>		
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 Environmental Permitting Regulations (EPR) RGN 1 Understanding the meaning of operator.	✓
<b>European Directives</b>		
Applicable directives	All applicable European directives have been considered in the determination of the application.	✓
<b>The site</b>		
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>The operator has supplied an updated plan of emission points.</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>	✓

Aspect considered	Justification / Detail	Criteria met
		Yes
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>The site is located within 2km of a local nature reserve and nine local wildlife sites.</p> <p>A full 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 site.</p> <p>We have not formally consulted on the application. The decision was taken in accordance with our guidance.</p>	✓
<b>Environmental Risk Assessment and operating techniques</b>		
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.</p>	✓
Operating techniques	<p>We have reviewed the techniques used by the operator and compared these with the relevant guidance notes.</p> <p>See key issues section for further details.</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 BAT Reference documents and BAT Conclusions.</p>	✓
<b>The permit conditions</b>		
Updating permit conditions during	<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 permits.</p>	✓

Aspect considered	Justification / Detail	Criteria met
		Yes
consolidation.	The operator has agreed that the new conditions are acceptable.	
Waste types	<p>We have specified the permitted waste types, descriptions and quantities, which can be accepted at the regulated facility.</p> <p>This variation does not allow any new waste codes to be added, just restructures the lists of waste to take into account the changes to the regulated activities as a result of the IED.</p>	✓
Improvement conditions	<p>Based on the information on the application, we consider that we need to impose improvement conditions.</p> <p>We have imposed improvement conditions to ensure that:</p> <ul style="list-style-type: none"> <li>➤ appropriate measures are in place to ensure that accidents that may cause pollution are minimised.</li> </ul> <p>There is an improvement condition which has not been completed. We have included the condition and updated it to require the operator to undertake the installation of alarms before using any tank which does not yet have them installed.</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> <p>We have incorporated the application forms and referenced supporting information as these detail how the facility will use BAT and appropriate measures to prevent a negative impact on the environment.</p>	✓
<b>Operator Competence</b>		
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	✓

Aspect considered	Justification / Detail	Criteria met
		Yes
	taken in accordance with RGN 5 on Operator Competence.	
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.	✓