

Notice of variation and consolidation with introductory note

The Environmental Permitting (England & Wales) Regulations 2010

Greif UK Ltd
Greif UK Ltd
Merseyside Works
Oil Sites Road
Ellesmere Port
South Wirral
Cheshire
CH65 4EZ

Variation application number

EPR/GP3235WS/V002

Permit number

EPR/GP3235WS

Greif UK Ltd

Permit number EPR/GP3235WS

Introductory note

This introductory note does not form a part of the notice.

Under the Environmental Permitting (England & Wales) Regulations 2010 (schedule 5, part 1, paragraph 19) a variation may comprise a consolidated permit reflecting the variations and a notice specifying the variations included in that consolidated permit.

Schedule 1 of the notice specifies the conditions that have been varied and schedule 2 comprises a consolidated permit which reflects the variations being made. All the conditions of the permit have been varied and are subject to the right of appeal.

Brief description of the changes introduced by this variation notice:

This is a variation applied for by the operator. Changes to the permit are required to include a waste operation for the storage and treatment of non-hazardous packaging when the need arises. The annual throughput for the non-hazardous waste operation is less than 5,000 tonnes. The permit now has a combined annual throughput of 10,000 tonnes – 5,000 tonnes for the installation activity (which is unchanged), as detailed below, and less than 5,000 tonnes for the non-hazardous waste operation.

The waste operation is on an area of land situated within the current installation boundary.

The main features of this permit are as follows:

The permit is granted to Greif UK Limited to operate an installation carrying out activities covered by the description in Section 5.3 Part A(1)(a)(ii) in Part 1 to Schedule 1 of the Environmental Permitting Regulations:

Section 5.3 Part A(1)(a)(ii) - Recovery of hazardous waste with a capacity exceeding 10 tonnes per day involving physico-chemical treatment by decontamination, crushing and shredding.

The site is located within the Greif UK Limited factory complex off Oil Sites Road approximately 1.4 km east-north-east of Ellesmere Port town centre. The approximate Ordnance Survey National Grid Reference for the centre of the site is SJ4129476674.

Greif UK Limited will install wash plant for steel drums and intermediate bulk containers (IBCs) at Ellesmere Port Site. The packaging will be collected from industrial sources primarily for reconditioning and reuse. This will be nominally empty hazardous and non-hazardous packaging. The primary activities on site will be the washing and processing of 210 litre steel drums and 1000 litre IBCs.

The activities will take place in a building on an impermeable surface with sealed drainage.

The washing medium will be a caustic solution for both product streams. The waste waters from the cleaning operations will be collected and stored in tanks before being taken offsite by tanker for treatment. Drums not suitable for washing will be transferred to the company's sister plant (Earthminded UK Limited at Avonmouth) for thermal cleaning.

In addition, recovery operations will exist for clean steel waste from drums unfit for reuse and high density polyethylene (HDPE) generated from unusable IBCs and plastic packaging. Recoverable packaging that cannot be processed will be sent offsite for processing by approved partners.

The hazardous waste treatment capacities are 20 tonnes per day for decontamination and 2 tonnes per day for the shredding and crushing of non-reusable uncleaned IBCs. The overall annual throughput for the activities covered under Section 5.3 Part A(1)(a)(ii) is 5,000 tonnes and the total on site hazardous waste storage capacity is 50 tonnes at any one time.

The resulting waste streams from the treatment process include; residues from IBCs and drums, waste water from the cleaning operations, scrapped drums, IBCs and scrap metals. Other waste streams include wood and fibre boards from broken pallets. Emissions from the site include point source emissions from gas boiler and curing oven. Emission to sewer will be considered in future.

There are five relevant nature conservation sites. These include:

- One Special Protection Areas (SPA): 'Mersey Estuary' within 10 km of the installation;
- One Ramsar Site: 'Mersey Estuary' within 10 km of the installation;
- One Site of Special Scientific Interest (SSSI): 'Mersey Estuary' within 2 km of the installation;
- One Local Nature Reserve (LNR): 'Whitby Park;' and
- One Local Wildlife Sites (LWS): 'Jack's Wood' within 2 km of the installation.

This permit implements the requirements of the European Union Directive on Industrial Emissions.

The Operator has an Environmental Management System, and is currently undertaking the process for accreditation for ISO14001.

The schedules specify the changes made to the 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		
Description	Date	Comments
Application EPR/GP3235WS/A001	Duly made 12/01/15	Application for physic-chemical treatment of steel drums and IBC's by decontamination, crushing and shredding.
Additional information received	12/03/15	Response to Schedule 5 Notice dated 24/02/15
	26/03/15	Response to question 6 of the Schedule 5 Notice received.
	07/04/15	Response to Schedule 5 Notice dated 23/03/15
	22/04/15	Response to questions on draining of product from drum and IBC, oxidizing liquids & solids, peroxides and flammable solvents.
Permit determined EPR/GP3235WS (Billing ref. GP3235WS)	29/04/15	Permit issued to Greif UK Limited (trading as Earthminded).
Application EPR/GP3235WS/V002 (variation and consolidation)	Duly made 25/09/15	Application to vary and update the permit to modern conditions.
Variation determined EPR/GP3235WS (Billing ref. LP3630RP)	10/12/2015	Varied and consolidated permit issued in modern condition format.

End of introductory note

Notice of variation and consolidation

The 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 and consolidates

Permit number

EPR/GP3235WS

Issued to

Greif UK Ltd (“the operator”)

whose registered office is

**Greif UK Ltd
Merseyside Works
Oil Sites Road
Ellesmere Port
South Wirral
Cheshire
CH65 4EZ**

company registration number 06633687

to operate a regulated facilities at

**Greif UK Ltd
Merseyside Works
Oil Sites Road
Ellesmere Port
South Wirral
Cheshire
CH65 4EZ**

to the extent set out in the schedules.

The notice shall take effect from 10/12/2015

Name	Date
Anne Nightingale	10/12/2015

Authorised on behalf of the Environment Agency

Schedule 1

All conditions other than (Condition 1.1, 1.4, 2.2, 2.4, 3.1, 3.2, 3.3, 3.4, 3.5, 4.1, 4.4, Schedule 1, Table S1.3, Schedule 2, Table S2.1, Schedule 4 and Schedule 5) have been varied by the consolidated permit EPR/GP3235WS (GP3235WS) as a result of the application made by the operator.

The following conditions were varied as a result of an Environment Agency initiated variation:

Schedule 2, Table S2.2

Schedule 6 - Interpretation

Schedule 7 – Site Plan

Schedule 2 – consolidated permit

Consolidated permit issued as a separate document.

Permit

The Environmental Permitting (England and Wales) Regulations 2010

Permit number

EPR/GP3235WS

This is the consolidated permit referred to in the variation and consolidation notice for application EPR/GP3235WS/V002 authorising,

Greif UK Ltd (“the operator”),

whose registered office is

**Greif UK Ltd
Merseyside Works
Oil Sites Road
Ellesmere Port
South Wirral
Cheshire
CH65 4EZ**

company registration number 06633687

to operate an installation and waste operations at

**Greif UK Ltd
Merseyside Works
Oil Sites Road
Ellesmere Port
South Wirral
Cheshire
CH65 4EZ**

to the extent authorised by and subject to the conditions of this permit.

Name	Date
Anne Nightingale	10/12/2015

Authorised on behalf of the Environment Agency

Conditions

1 Management

1.1 General management

- 1.1.1 The operator shall manage and operate the activities:
- (a) in accordance with a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances, closure and those drawn to the attention of the operator as a result of complaints; and
 - (b) using sufficient competent persons and resources.
- 1.1.2 Records demonstrating compliance with condition 1.1.1 shall be maintained.
- 1.1.3 Any person having duties that are or may be affected by the matters set out in this permit shall have convenient access to a copy of it kept at or near the place where those duties are carried out.
- 1.1.4 The operator shall comply with the requirements of an approved competence scheme.

1.2 Energy efficiency

- 1.2.1 For the following activities referenced in schedule 1, table S1.1 (A1 to A7) the operator shall:
- (a) take appropriate measures to ensure that energy is used efficiently in the activities;
 - (b) review and record at least every four years whether there are suitable opportunities to improve the energy efficiency of the activities; and
 - (c) take any further appropriate measures identified by a review.

1.3 Efficient use of raw materials

- 1.3.1 For the following activities referenced in schedule 1, table S1,1 (A1 to A7) the operator shall:
- (a) take appropriate measures to ensure that raw materials and water are used efficiently in the activities;
 - (b) maintain records of raw materials and water used in the activities;
 - (c) review and record at least every four years whether there are suitable alternative materials that could reduce environmental impact or opportunities to improve the efficiency of raw material and water use; and
 - (d) take any further appropriate measures identified by a review.

1.4 Avoidance, recovery and disposal of wastes produced by the activities

- 1.4.1 The operator shall take appropriate measures to ensure that:
- (a) the waste hierarchy referred to in Article 4 of the Waste Framework Directive is applied to the generation of waste by the activities; and
 - (b) any waste generated by the activities is treated in accordance with the waste hierarchy referred to in Article 4 of the Waste Framework Directive; and
 - (c) where disposal is necessary, this is undertaken in a manner which minimises its impact on the environment.

- 1.4.2 The operator shall review and record at least every four years whether changes to those measures should be made and take any further appropriate measures identified by a review.

2 Operations

2.1 Permitted activities

- 2.1.1 The operator is only authorised to carry out the activities specified in schedule 1 table S1.1 (the “activities”).
- 2.1.2 For the following activities referenced in schedule 1, table S1.1 (A1 to A7) waste authorised by this permit shall be clearly distinguished from any other waste on the site.

2.2 The site

- 2.2.1 The activities shall not extend beyond the site, being the land shown edged in green on the site plan at schedule 7 to this permit.

2.3 Operating techniques

- 2.3.1 The activities shall, subject to the conditions of this permit, be operated using the techniques and in the manner described in the documentation specified in schedule 1, table S1.2, unless otherwise agreed in writing by the Environment Agency.
- 2.3.2 If notified by the Environment Agency that the activities are giving rise to pollution, the operator shall submit to the Environment Agency for approval within the period specified, a revision of any plan or other documentation (“plan”) specified in schedule 1, table S1.2 or otherwise required under this permit which identifies and minimises the risks of pollution relevant to that plan, and shall implement the approved revised plan in place of the original from the date of approval, unless otherwise agreed in writing by the Environment Agency.
- 2.3.3 Any raw materials or fuels listed in schedule 2 table S2.1 shall conform to the specifications set out in that table.
- 2.3.4 Waste shall only be accepted if:
- (a) it is of a type and quantity listed in schedule 2 tables S2.2, S2.3; and
 - (b) it conforms to the description in the documentation supplied by the producer and holder.
- 2.3.5 The operator shall ensure that where waste produced by the activities is sent to a relevant waste operation, that operation is provided with the following information, prior to the receipt of the waste:
- (a) the nature of the process producing the waste;
 - (b) the composition of the waste;
 - (c) the handling requirements of the waste;
 - (d) the hazardous property associated with the waste, if applicable; and
 - (e) the waste code of the waste.
- 2.3.6 The operator shall ensure that where waste produced by the activities is sent to a landfill site, it meets the waste acceptance criteria for that landfill.
- 2.3.7 Hazardous waste shall not be mixed, either with a different category of hazardous waste or with other waste, substances or materials, unless it is authorised by schedule 1 table S1.1 and appropriate measures are taken.

2.4 Pre-operational conditions

- 2.4.1 The operations specified in schedule 1 table S1.3 shall not commence until the measures specified in that table have been completed.

3 Emissions and monitoring

3.1 Emissions to water, air or land

- 3.1.1 There shall be no point source emissions to water, air or land except from the sources and emission points listed in schedule 3 tables S3.1 and S3.2.
- 3.1.2 The limits given in schedule 3 shall not be exceeded.
- 3.1.3 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.

3.2 Emissions of substances not controlled by emission limits

- 3.2.1 Emissions of substances not controlled by emission limits (excluding odour) shall not cause pollution. The operator shall not be taken to have breached this condition if appropriate measures, including, but not limited to, those specified in any approved emissions management plan, have been taken to prevent or where that is not practicable, to minimise, those emissions.
- 3.2.2 The operator shall:
- (a) if notified by the Environment Agency that the activities are giving rise to pollution, submit to the Environment Agency for approval within the period specified, an emissions management plan which identifies and minimises the risks of pollution from emissions of substances not controlled by emission limits;
 - (b) implement the approved emissions management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.
- 3.2.3 All liquids in containers, whose emission to water or land could cause pollution, shall be provided with secondary containment, unless the operator has used other appropriate measures to prevent or where that is not practicable, to minimise, leakage and spillage from the primary container.

3.3 Odour

- 3.3.1 Emissions from the activities shall be free from odour at levels likely to cause pollution outside the site, as perceived by an authorised officer of the Environment Agency, unless the operator has used appropriate measures, including, but not limited to, those specified in any approved odour management plan, to prevent or where that is not practicable to minimise the odour.
- 3.3.2 The operator shall:
- (a) if notified by the Environment Agency that the activities are giving rise to pollution outside the site due to odour, submit to the Environment Agency for approval within the period specified, an odour management plan which identifies and minimises the risks of pollution from odour;
 - (b) implement the approved odour management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.

3.4 Noise and vibration

- 3.4.1 Emissions from the activities shall be free from noise and vibration at levels likely to cause pollution outside the site, as perceived by an authorised officer of the Environment Agency, unless the operator has used appropriate measures, including, but not limited to, those specified in any approved noise and vibration management plan to prevent or where that is not practicable to minimise the noise and vibration.
- 3.4.2 The operator shall:
- (a) if notified by the Environment Agency that the activities are giving rise to pollution outside the site due to noise and vibration, submit to the Environment Agency for approval within the period specified, a noise and vibration management plan which identifies and minimises the risks of pollution from noise and vibration;
 - (b) implement the approved noise and vibration management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.

3.5 Monitoring

- 3.5.1 The operator shall, unless otherwise agreed in writing by the Environment Agency, undertake the monitoring specified in the following tables in schedule 3 to this permit:
- (a) point source emissions specified in tables S3.1 and S3.2;
- 3.5.2 The operator shall maintain records of all monitoring required by this permit including records of the taking and analysis of samples, instrument measurements (periodic and continual), calibrations, examinations, tests and surveys and any assessment or evaluation made on the basis of such data.

3.6 Pests

- 3.6.1 The activities shall not give rise to the presence of pests which are likely to cause pollution, hazard or annoyance outside the boundary of the site. The operator shall not be taken to have breached this condition if appropriate measures, including, but not limited to, those specified in any approved pests management plan, have been taken to prevent or where that is not practicable, to minimise the presence of pests on the site.
- 3.6.2 The operator shall:
- (a) if notified by the Environment Agency, submit to the Environment Agency for approval within the period specified, a pests management plan which identifies and minimises risks of pollution from pests;
 - (b) implement the pests management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.

4 Information

4.1 Records

4.1.1 All records required to be made by this permit shall:

- (a) be legible;
- (b) be made as soon as reasonably practicable;
- (c) if amended, be amended in such a way that the original and any subsequent amendments remain legible, or are capable of retrieval; and
- (d) be retained, unless otherwise agreed in writing by the Environment Agency, for at least 6 years from the date when the records were made, or in the case of the following records until permit surrender:
 - (i) off-site environmental effects; and
 - (ii) matters which affect the condition of the land and groundwater.

4.1.2 The operator shall keep on site all records, plans and the management system required to be maintained by this permit, unless otherwise agreed in writing by the Environment Agency.

4.2 Reporting

4.2.1 The operator shall send all reports and notifications required by the permit to the Environment Agency using the contact details supplied in writing by the Environment Agency.

4.2.2 For the following activities referenced in schedule 1, table S1.1 (A1 to A7) a report or reports on the performance of the activities over the previous year shall be submitted to the Environment Agency by 31 January (or other date agreed in writing by the Environment Agency) each year. The report(s) shall include as a minimum:

- (a) a review of the results of the monitoring and assessment carried out in accordance with the permit including an interpretive review of that data;
- (b) the annual production/treatment data set out in schedule 4 table S4.2; and
- (c) the performance parameters set out in schedule 4 table S4.3 using the forms specified in table S4.4 of that schedule.

4.2.3 Within 28 days of the end of the reporting period the operator shall, unless otherwise agreed in writing by the Environment Agency, submit reports of the monitoring and assessment carried out in accordance with the conditions of this permit, as follows:

- (a) in respect of the parameters and emission points specified in schedule 4 table S4.1;
- (b) for the reporting periods specified in schedule 4 table S4.1 and using the forms specified in schedule 4 table S4.4; and
- (c) giving the information from such results and assessments as may be required by the forms specified in those tables.

4.2.4 The operator shall, unless notice under this condition has been served within the preceding four years, submit to the Environment Agency, within six months of receipt of a written notice, a report assessing whether there are other appropriate measures that could be taken to prevent, or where that is not practicable, to minimise pollution.

4.2.5 Within 1 month of the end of each quarter, the operator shall submit to the Environment Agency using the form made available for the purpose, the information specified on the form relating to the site and the waste accepted and removed from it during the previous quarter.

4.3 Notifications

4.3.1 In the event:

- (a) 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) 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) 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.

4.3.2 Any information provided under condition 4.3.1 (a)(i), or 4.3.1 (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 5 to this permit within the time period specified in that schedule.

4.3.3 Where the Environment Agency has requested in writing that it shall be notified when the operator is to undertake monitoring and/or spot sampling, the operator shall inform the Environment Agency when the relevant monitoring and/or spot sampling is to take place. The operator shall provide this information to the Environment Agency at least 14 days before the date the monitoring is to be undertaken.

4.3.4 The Environment Agency shall be notified within 14 days of the occurrence of the following matters, except where such disclosure is prohibited by Stock Exchange rules:

Where the operator is a registered company:

- (a) any change in the operator's trading name, registered name or registered office address; and
- (b) any steps taken with a view to the operator going into administration, entering into a company voluntary arrangement or being wound up.

Where the operator is a corporate body other than a registered company:

- (a) any change in the operator's name or address; and
- (b) any steps taken with a view to the dissolution of the operator.

In any other case:

- (a) the death of any of the named operators (where the operator consists of more than one named individual);
- (b) any change in the operator's name(s) or address(es); and
- (c) any steps taken with a view to the operator, or any one of them, going into bankruptcy, entering into a composition or arrangement with creditors, or, in the case of them being in a partnership, dissolving the partnership.

4.3.5 Where the operator proposes to make a change in the nature or functioning, or an extension of the activities, which may have consequences for the environment and the change is not otherwise the subject of an application for approval under the Regulations or this permit:

- (a) the Environment Agency shall be notified at least 14 days before making the change; and
- (b) the notification shall contain a description of the proposed change in operation.

4.3.6 The Environment Agency shall be given at least 14 days notice before implementation of any part of the site closure plan.

4.4 Interpretation

4.4.1 In this permit the expressions listed in schedule 6 shall have the meaning given in that schedule.

4.4.2 In this permit references to reports and notifications mean written reports and notifications, except where reference is made to notification being made “immediately”, in which case it may be provided by telephone.

Schedule 1 – Operations

Table S1.1 activities			
Activity reference	Activity listed in Schedule 1 of the EP Regulations	Description of specified activity and WFD Annex I and II operations	Limits of specified activity and waste types
A1	S5.3A(1)(a)(ii) Recovery of hazardous waste with a capacity exceeding 10 tonnes per day involving physico-chemical treatment	<p>R4: Recovery of hazardous steel drums with a capacity exceeding 10 tonnes per day (in aggregate) involving chemical decontamination.</p> <p>R3: Recovery of hazardous IBCs with a capacity exceeding 10 tonnes per day (in aggregate) involving chemical decontamination.</p>	<p>From receipt of steel drums and IBCs to storage and despatch of decontaminated packaging wastes.</p> <p>Treatment limited to chemical decontamination of nominally empty drums & IBCs using caustic soda solution.</p> <p>Drums and IBCs containing water reactive substances (HP12 hazardous code) are not permitted for treatment.</p> <p>Treatment of hazardous waste shall be limited to maximum of 20 tonnes per day.</p> <p>Treatment shall be carried out inside a building.</p> <p>Waste types as specified in table S2.2.</p>
A2	S5.3A(1)(a)(ii) Recovery of hazardous waste with a capacity exceeding 10 tonnes per day involving physico-chemical treatment	R3: Recovery of hazardous IBCs with a capacity exceeding 10 tonnes per day (in aggregate) involving crushing and shredding.	<p>Treatment limited to shredding & crushing of non-reusable empty uncleaned IBCs for material recycling.</p> <p>Shredding of IBCs shall be limited to 2 tonnes per day.</p> <p>Treatment shall be carried out inside a building.</p> <p>Waste types as specified in table S2.2.</p>
Directly Associated Activity			
A3	Crushing and shredding of cleaned drums	R4: Recovery of non-hazardous steel drums involving crushing and shredding.	<p>From receipt of non-reusable drums decontaminated on site to storage and despatch of crushed and shredded drums.</p> <p>Crushing & shredding of cleaned drums shall be limited to 3 tonnes per day.</p>
A4	Storage of hazardous waste	R13: Storage of hazardous waste pending physico-chemical treatment (R4 & R5) and offsite transfer.	<p>No more than 50 tonnes of hazardous waste shall be stored on site at any one time.</p> <p>Waste types as specified in Table 2.2.</p>
A5	Reconditioning and re-bottling	Reconditioning and re-bottling of decontaminated drums & IBCs	From receipt of cleaned drums & IBCs to reconditioning and re-bottling to enable re-sale & reuse.

Table S1.1 activities			
Activity reference	Activity listed in Schedule 1 of the EP Regulations	Description of specified activity and WFD Annex I and II operations	Limits of specified activity and waste types
A6	Gas Boiler	Operation of a gas boiler with thermal input capacity of 1.770 MW for site heating requirement.	From receipt of fuel to the use of the generated steam for site heating and discharge of emissions to air.
A7	Curing oven	Operation of curing oven with thermal input capacity of 1 MW.	From receipt of fuel to the curing of water based paint use for reconditioning steel drums.
Activity reference	Description of activities for waste operations	Limits of activities	
A8	<p>D15: Storage pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where it is produced).</p> <p>D14: Repackaging prior to submission to any of the operations numbered D1 to D13.</p> <p>D9: Physico-chemical treatment resulting in final compounds or mixtures which are discarded by any of the operations numbered D1 to D12.</p> <p>R13: Storage of wastes pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced).</p> <p>R12: Exchange of wastes for submission to any of the operations numbered R1 to R10.</p> <p>R5: Recycling/reclamation of other inorganic materials.</p> <p>R4: Recycling/reclamation of metals and metal compounds.</p> <p>R3: Recycling/reclamation of organic substances which are not used as solvents.</p>	<p>Treatment operations shall be limited to: Physico-chemical treatment, washing, manual sorting, separation, screening, bailing, shredding, crushing, or compaction of non-hazardous waste into different components for disposal (no more than 50 tonnes per day) or recovery/reconditioning/reuse.</p> <p>Treatment in shredders of non hazardous metal waste, for recovery (no more than 75 tonnes per day).</p> <p>Transfer of packaging not suitable for the above processes to permitted third parties for R13 and/or D15.</p> <p>Waste types as specified in Table S2.3.</p>	

Table S1.2 Operating techniques		
Description	Parts	Date Received
Application	Non-technical summary v1 (excluding non-hazardous EWC waste codes) provided in response to section 5c – Non-technical summary of your application, Part B2 of the application form.	Duly Made 12/01/15

Table S1.2 Operating techniques		
Description	Parts	Date Received
	<p>Environmental Risk Assessment dated 27 October 2014 and Risk Assessment Report ROW1, ROW 02, ROW 03 but excluding reference to incinerator and ROW 05 provided in response to section 6 – Environmental Risk Assessment, Part B2 of the application form.</p> <p>Packaging acceptance policy/terms of acceptance for empty packaging, Operational Procedures for Waste Requiring Specific Handling (SSOW G001 EP) and Unauthorised Waste Delivery (SSOW G002 EP) and the referenced technical guidance notes provided in response to section 3a – technical standards, Part B3 of the application form.</p> <p>Section 1, reference 11 of the Environment Management System Records in response to section 6a – Basic measures for improving energy efficiency, Part B3 of the application form.</p>	
Response to Schedule 5 Notice dated 24/02/15	<p>Response to question:</p> <ul style="list-style-type: none"> • 1 - H12 water reactive products, • 2 - site condition report, • 3 - waste pre-acceptance excluding non-hazardous EWC waste codes, • 4 - waste acceptance excluding product list document, • 5 - waste storage, • 6(d) - waste treatment procedure, • 7 - risk assessment report, • 9 - reference to drum furnace, • 10 - gas oil, • 12 - gas boilers, • 14 - Accident Management Plan 	Received 12/03/15
Additional information	<ul style="list-style-type: none"> • IBCs and drums treatment layout • Flow diagrams - IBC & drum washing processes and • Wash tank dimensions. 	Received 26/03/15
Response to Schedule 5 Notice dated 23/03/15	<p>Response to question -</p> <ul style="list-style-type: none"> • 1a – referenced Industrial Packaging Association standard on collection of empty, uncleaned packaging & IBCs, • 1b – source of packaging waste, • 3b – water reactive substances, • 3e – drainage containment within the bunded area, • 4b – emission abatement for shredding nominally empty IBCs, • 4c – plastic shredding and drum crushing capacities, • 6 – thermal input capacity of gas boiler and • 7 – thermal input and uses of curing oven. 	Received 07/04/15
Additional information	<p>Response to clarification on:</p> <ul style="list-style-type: none"> • pre-acceptance sampling and • segregated storage of nominally empty packaging. 	Received 21/04/15

Table S1.2 Operating techniques		
Description	Parts	Date Received
	<p>Response to questions on:</p> <ul style="list-style-type: none"> • draining of product from drums and IBCs and • oxidizing liquids & solids, peroxides and flammable solvents. 	22/04/15
Variation and consolidation application EPR/GP3235WS/V002	<p>The response to Question 3 Operating techniques, given in Part B4 of the application form. Includes Table 3a – Technical Standards.</p> <p>Non-technical summary provided in response to section 5c – Non-technical summary of your application, Part B2 of the application form.</p> <p>Environmental Risk Assessment dated 27 October 2014 and Risk Assessment Report ROW1, ROW 02, ROW 03 but excluding reference to incinerator and ROW 05 provided in response to section 6 – Environmental Risk Assessment, Part B2 of the application form.</p>	Duly Made 25/09/15

Table S1.3 Pre-operational measures for future development		
Reference	Operation	Pre-operational measures
PO1	Use of the existing drains, waste storage tanks and other pollution prevention measures	<p>At least 4 weeks prior to the use of the existing pollution prevention and waste storage infrastructure at the site, the operator shall submit to the Environment Agency a written report demonstrating that site surfacing, bunds, drains and waste storage tanks are fit for purpose and comply with the requirements of the Sector Guidance Note IPPC S5.06, Issue 5 and How to Comply with Your Environmental Permit, (Version 6 - June 2013).</p> <p>The report shall contain details of the inspection and testing carried out on the site surfacing, bunds, waste storage tanks and drains, to include a CCTV survey of the existing drains where applicable in accordance with the requirements of sections 2.1.3 and 2.2.5 of IPPC S5.06 and requirements for Releases from Liquids in Containers as specified in How to Comply with Your Environmental Permit.</p> <p>The operator shall not use the existing pollution prevention infrastructure at the site until any improvements identified by the operator and approved by the Environment Agency have been implemented.</p>
PO2	Connection to sewer	<p>At least 4 weeks prior to connection to the sewer, the operator shall submit to the Environment Agency a written report on the assessment of emissions to sewer. This assessment shall be carried out in accordance with H1 risk assessment methodology detailed in H1 Annex D - Discharges to Surface Waters, v2.3 September 2014 and H1 Annex D1 - Assessment of Hazardous Pollutants Within Surface Water Discharges, v2.0 October 2014.</p> <p>The report shall contain detail of hazardous substances within the proposed discharge derived from that assessment that may have an impact on surface water once discharged from the sewer treatment plant and their associated limits where applicable.</p> <p>The discharge to sewer shall not commence until the report is approved by the Environment Agency.</p>

Schedule 2 – Waste types, raw materials and fuels

Raw materials and fuel description	Specification
Caustic soda	Maximum of 50 tonnes per year.
Sodium Nitrate	Maximum of 25 tonnes per year.
Water-based paints	-

Maximum quantity	Throughput no more than 5,000 tonnes per year. Hazardous waste properties – HP2, HP3, HP4, HP5, HP6, HP7, HP8, HP10, HP11, HP13 and HP14. Packaging with residue that possesses HP12 hazardous property shall not be treated on site. Only nominally empty packages are permitted for storage and treatment.
Waste code	Description
15	Waste packaging, absorbents, wiping cloths, filter materials and protective clothing not otherwise specified
15 01	packaging (including separately collected municipal packaging waste)
15 01 10*	packaging containing residues of or contaminated by hazardous substances

Maximum quantity	Throughput less than 5000 tonnes per year. Only nominally empty packages are permitted for storage and treatment.
Waste code	Description
15	Waste packaging, absorbents, wiping cloths, filter materials and protective clothing not otherwise specified
15 01	packaging (including separately collected municipal packaging waste)
15 01 01	paper and cardboard packaging
15 01 02	plastic packaging
15 01 03	wooden packaging
15 01 04	metallic packaging
15 01 05	composite packaging
15 01 06	mixed packaging
15 01 09	textile packaging

Schedule 3 – Emissions and monitoring

Emission point ref. & location	Source	Parameter	Limit (including unit)	Reference period	Monitoring frequency	Monitoring standard or method
Vents on steel & IBC wash tanks on site plan EP1(b)	Wash systems	No parameters set	No limit set	--	--	
Gas washer on site plan EP1(b)	1.77 MW gas boiler	No parameters set	No limit set	--	--	
Curing oven on site plan EP1(b)	1 MW curing oven	No parameters set	No limit set	--	--	

Emission point ref. & location	Source	Parameter	Limit (incl. Unit)	Reference period	Monitoring frequency	Monitoring standard or method
Sewer emission point to be specified following compliance with pre-operational condition PO2	As per Requirement to be set under PO2	As per Requirement to be set under PO2	As per Requirement to be set under PO2	As per Requirement to be set under PO2	As per Requirement to be set under PO2	As per Requirement to be set under PO2

Schedule 4 – Reporting

Parameters, for which reports shall be made, in accordance with conditions of this permit, are listed below.

Table S4.1 Reporting of monitoring data			
Parameter	Emission or monitoring point/reference	Reporting period	Period begins
Emissions to sewer Parameters as required by condition 3.5.1.	Note 1	Every 12 months	1 January
Note 1 – monitoring point to be specified following compliance with pre-operational condition PO2.			

Table S4.2 Annual production/treatment	
Parameter	Units
Hazardous packaging waste received	tonnes
Hazardous packaging waste removed	tonnes

Table S4.3 Performance parameters		
Parameter	Frequency of assessment	Units
Water usage	Annually	tonnes
Energy usage	Annually	MWh
Total raw material used	Annually	tonnes

Table S4.4 Reporting forms		
Media/parameter	Reporting format	Date of form
Waste Return	Waste Return Form - RATS2E	
Water usage	Form water usage 1 or other form as agreed in writing by the Environment Agency	29/04/15
Energy usage	Form energy 1 or other form as agreed in writing by the Environment Agency	29/04/15
Other performance indicators	Form performance 1 or other form as agreed in writing by the Environment Agency	29/04/15

Schedule 5 – 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	EPR/GP3235WS
Name of operator	Greif UK Ltd
Location of Facility	Merseyside Works Oil Sites Road Ellesmere Port Cheshire CH65 4EZ
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	

(b) Notification requirements for the breach of a limit	
To be notified within 24 hours of detection unless otherwise specified below	
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.	

Name*	
Post	
Signature	
Date	

* authorised to sign on behalf of the operator

Schedule 6 – Interpretation

“accident” means an accident that may result in pollution.

“application” means the application for this permit, together with any additional information supplied by the operator as part of the application and any response to a notice served under Schedule 5 to the EP Regulations.

“authorised officer” means any person authorised by the Environment Agency under section 108(1) of The Environment Act 1995 to exercise, in accordance with the terms of any such authorisation, any power specified in section 108(4) of that Act.

“disposal” means any of the operations provided for in Annex I to Directive 2008/98/EC of the European Parliament and of the Council on waste.

“emissions to land” includes emissions to groundwater.

“EP Regulations” means The Environmental Permitting (England and Wales) Regulations SI 2010 No. 675 and words and expressions used in this permit which are also used in the Regulations have the same meanings as in those Regulations.

“emissions of substances not controlled by emission limits” means emissions of substances to air, water or land from the activities, either from the emission points specified in schedule 3 or from other localised or diffuse sources, which are not controlled by an emission or background concentration limit.

“groundwater” means all water, which is below the surface of the ground in the saturation zone and in direct contact with the ground or subsoil.

“Hazardous property” has the meaning in Annex III of the Waste Framework Directive.

“Hazardous waste” has the meaning given in the Hazardous Waste (England and Wales) Regulations 2005 (as amended).

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

“List of Wastes” means the list of wastes established by Commission Decision 2000/532/EC replacing Decision 94/3/EC establishing a list of wastes pursuant to Article 1(a) of Council Directive 75/442/EEC on waste and Council Decision 94/904/EC establishing a list of hazardous waste pursuant to Article 1(4) of Council Directive 91/689/EEC on hazardous waste, as amended from time to time.

“nominally empty” means as empty as practically possible, using practices commonly employed to remove material from the type of packaging involved - including pouring, pumping, aspirating, shaking, scraping, chipping etc., or if necessary a combination of these.

“Pests” means Birds, Vermin and Insects.

“quarter” means a calendar year quarter commencing on 1 January, 1 April, 1 July or 1 October.

“recovery” means any of the operations provided for in Annex II to Directive 2008/98/EC of the European Parliament and of the Council on waste.

“Waste code” means the six digit code referable to a type of waste in accordance with the List of Wastes and in relation to hazardous waste, includes the asterisk.

“Waste Framework Directive” or “WFD” means Waste Framework Directive 2008/98/EC of the European Parliament and of the Council on waste.

Where a minimum limit is set for any emission parameter, for example pH, reference to exceeding the limit shall mean that the parameter shall not be less than that limit.

Unless otherwise stated, any references in this permit to concentrations of substances in emissions into air means:

- in relation to emissions from combustion processes, the concentration in dry air at a temperature of 273K, at a pressure of 101.3 kPa and with an oxygen content of 3% dry for liquid and gaseous fuels, 6% dry for solid fuels; and/or
- in relation to emissions from non-combustion sources, the concentration at a temperature of 273K and at a pressure of 101.3 kPa, with no correction for water vapour content.

“year” means calendar year ending 31 December.

Where the following terms appear in the waste code list in Table S2.2 and Table S2.3 they have the meaning given below.

‘hazardous substance’ means a substance classified as hazardous as a consequence of fulfilling the criteria laid down in parts 2 to 5 of Annex I to Regulation (EC) No 1272/2008.

‘heavy metal’ means any compound of antimony, arsenic, cadmium, chromium (VI), copper, lead, mercury, nickel, selenium, tellurium, thallium and tin, as well as these materials in metallic form, as far as these are classified as hazardous substances.

‘polychlorinated biphenyls and polychlorinated terphenyls’ (‘PCBs’) means PCBs as defined in Article 2(a) of Council Directive 96/59/EC’.

Article 2(a) says that ‘PCBs’ means:

- polychlorinated biphenyls
- polychlorinated terphenyls
- monomethyl-tetrachlorodiphenyl methane, Monomethyl-dichloro-diphenyl methane, Monomethyldibromo-diphenyl methane
- any mixture containing any of the above mentioned substances in a total of more than 0.005% by weight.

‘transition metals’ means any of the following metals: any compound of scandium, vanadium, manganese, cobalt, copper, yttrium, niobium, hafnium, tungsten, titanium, chromium, iron, nickel, zinc, zirconium, molybdenum and tantalum, as well as these materials in metallic form, as far as these are classified as hazardous substances.

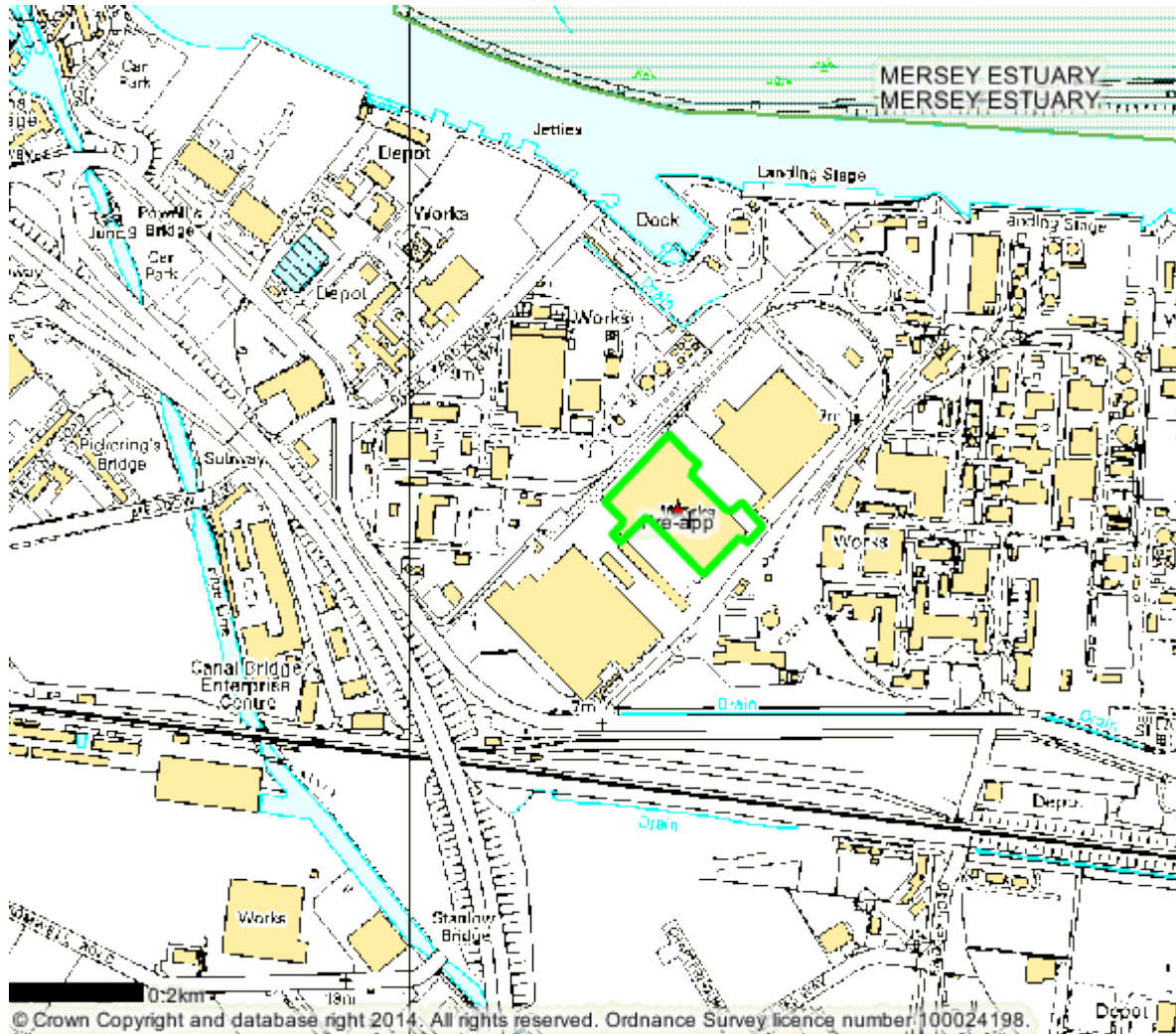
‘stabilisation’ means processes which change the hazardousness of the constituents in the waste and transform hazardous waste into non-hazardous waste.

‘solidification’ means processes which only change the physical state of the waste by using additives without changing the chemical properties of the waste.

‘partly stabilised wastes’ means wastes containing, after the stabilisation process, hazardous constituents which have not been changed completely into non-hazardous constituents and could be released into the environment in the short, middle or long term.

Schedule 7 – Site plan

Site location



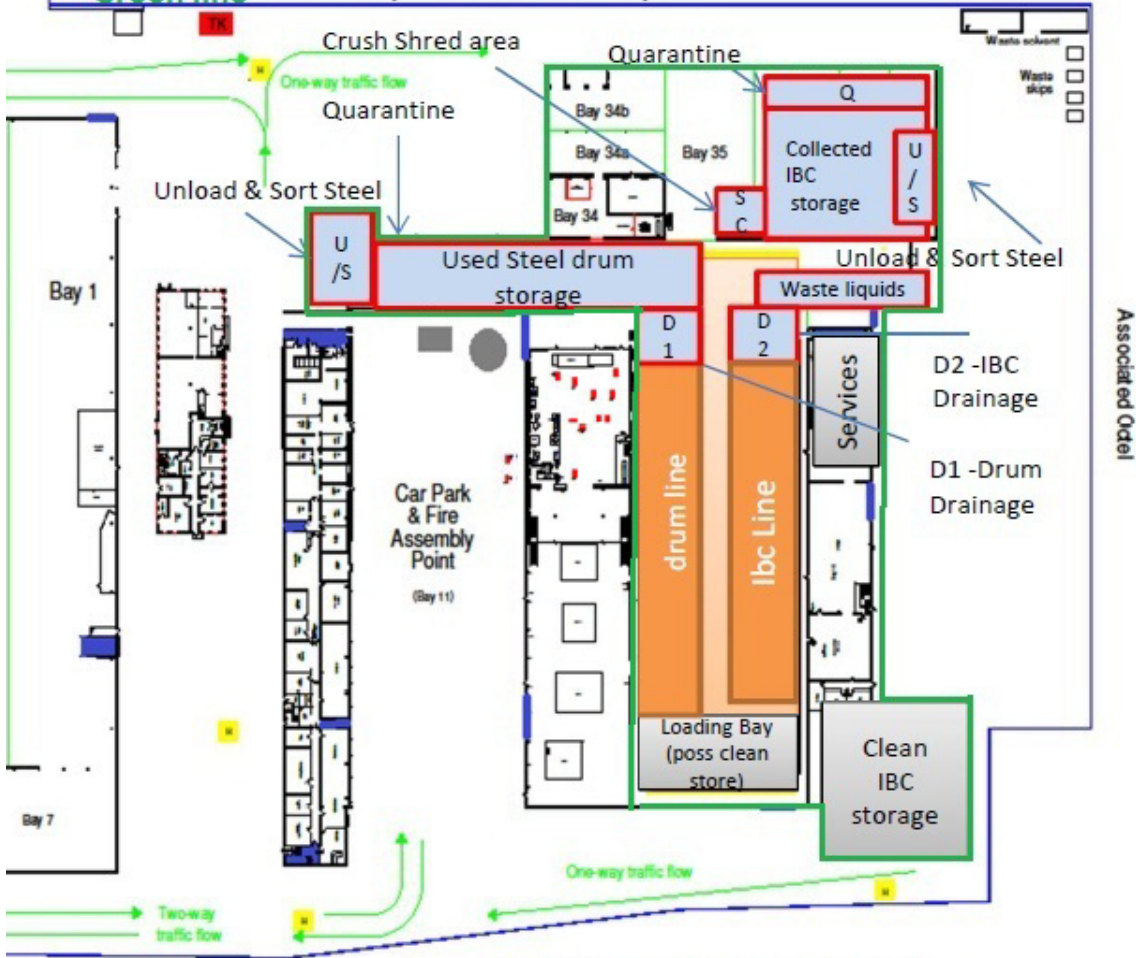
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Site layout plan

Greif EP1 Site Layout

Key:

- Blue Line marks the overall site ownership boundary
- Red Line marks bunded Areas
- Orange is the area of the production line
- Green line marks the permitted boundary



NOTE: The area inside the blue boundary is owned by Greif (UK) Ltd.

Octel

klor Cover

storage Areas

inkler Pump

ise

d	Drawn: N. Allen	Scale: 1:900	Drawing number 2	Sheet 1 of 1
c	Factory - EP1			
b	Div: Large Drum			
(Description of drawing):-		Greif UK Ellesmere Port Site Plan	Greif UK Ltd.	
issue	modification	date		

END OF PERMIT

Reporting Forms

Permit Number: EPR/GP3235WS

Operator: Greif UK Ltd

Facility: Merseyside Works

Form Number: WaterUsage1 / 29/04/15

Reporting of Water Usage for the year 2015

Water Source	Usage (m³/year)	Specific Usage (m³/unit output)
Mains water		
Site borehole		
River abstraction		
TOTAL WATER USAGE		

Operator's comments:

Signed

Date.....

(authorised to sign as representative of Operator)

Permit Number: EPR/GP3235WS

Operator:

Greif UK Ltd

Facility: Merseyside Works

Form Number:

Energy1 / 29/04/15

Reporting of Energy Usage for the year 2015

Energy Source	Energy Usage		Specific Usage (MWh/unit output)
	Quantity	Primary Energy (MWh)	
Electricity *	MWh		
Natural Gas	MWh		
Gas Oil	tonnes		
Recovered Fuel Oil	tonnes		
TOTAL	-		

* Conversion factor for delivered electricity to primary energy = 2.4

Operator's comments:

Signed

Date.....

(Authorised to sign as representative of Operator)

Permit Number: EPR/GP3235WS

Operator: Greif UK Ltd

Facility: Merseyside Works

Form Number: Performance1 / 29/04/15

Reporting of other performance indicators for the period DD/MM/YYYY to DD/MM/YYYY

Parameter	Units
Total raw material used	tonnes

Operator's comments:

Signed

Date.....

(Authorised to sign as representative of Operator)