

Environment Agency permitting decisions

Bespoke permit

We have decided to issue the permit for Leeds Pro-Fibre operated by Veolia ES (UK) Limited.

The permit number is EPR/BP3931RJ

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 responses

Description of the main features of the Installation

This application is for a paper pulping operation (referred to as 'Leeds Pro-Fibre'), operated by Veolia ES (UK) Limited. The incoming waste paper and cardboard will be delivered just-in-time and transferred directly to the paper pulper for batch processing. This will minimise the volumes of stored wastes. Water will be added to create a suitable pulp, facilitating the removal of any contaminants (dirt, metals and plastics). The output from the paper pulper will then be dewatered to produce the final cake and dried before sending offsite for manufacturing into products. The installation initially aims to process less than 10,000 tonnes within the first 12 months and then up to 20,000 tonnes per year.

The site comprises the following;

- The main paper pulping building
- Double stacked welfare and administration building to the east
- Dryer and heat exchanger positioned to the south of the main building
- Two galvanised steel tanks to the west, containing water for the process.

The key issues relating to this permit application are; a best available techniques assessment, risk assessment of noise, odour and dust, fire prevention and monitoring requirements to sewer.

Key issues of the decision

BAT Assessment

A BAT assessment was requested by the Environment Agency the operator made comparisons against Sections 8.1 and 8.5 of the best available techniques reference document (BREF) for the production of pulp, paper and board, 2015. The table below summarises the relevant BAT conclusions and findings of the assessment.

BAT Conclusions for the production of pulp, paper and board, were published by the European Commission on 30 September 2014. There are 53 BAT Conclusions. This section provides a record of decisions made in relation to each relevant BAT Conclusion applicable to the installation.

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

NA	Not Applicable
CC	Currently Compliant
FC	Compliant in the future (within 4 years of publication of BAT conclusions)
NC	Not Compliant

Decision checklist for relevant BAT Conclusions		
Summary of BAT Conclusion requirement for production of pulp	Status NA/CC/ FC/NC	Assessment of the installation capability and any alternative techniques proposed by the operator to demonstrate compliance with the BAT Conclusion requirement
BAT Conclusions that are not applicable to this installation	NA	Pulp & Paper Production BAT Conclusions; General BAT conclusions for the paper and pulping industry 3-4, 11, 13-16. BAT conclusions for Kraft Pulping 19 - 32 inclusive; BAT conclusions for Sulphite Pulping 33 -39 inclusive; BAT conclusions for Mechanical / Chemical Pulping 40 and 41; BAT conclusions for Processing Paper for Recycling 44. BAT conclusions for papermaking and related processes 47-53.
BAT Conclusions where we accept the operator is currently compliant and no further explanation is required.	CC	Pulp & Paper Production BAT Conclusions: General BAT Conclusions for the Pulp and Paper Industry 1-2, 5-10, 12, 17-18. BAT Conclusions Processing Paper for Recycling 42-43, 45-46.

Detailed assessment of BAT

Compliance Issue	Relevant Permit Condition	Compliance stated by Operator	Compliance assessment conclusion	Summary of Permitting Officer Assessment against BATc techniques	Compliance Action to Implement BAT Conclusions
Priority BAT indicated in Bold Text		CC/FC/ NC/NA	CC/FC/ NC/NA		
Environment Management System: BAT 1	1.1.1	CC	CC	ISO14001 Certified.	Validate compliance by Inspection
Raw materials: BAT 2	1.3.1	CC	CC	This process will only use waste paper recovered from the MPT	Validate compliance by Inspection

Compliance Issue Priority BAT indicated in Bold Text	Relevant Permit Condition	Compliance stated by Operator CC/FC/NC/NA	Compliance assessment conclusion CC/FC/NC/NA	Summary of Permitting Officer Assessment against BATc techniques	Compliance Action to Implement BAT Conclusions
				process at the adjacent REFR. No chemicals to be used.	
Water usage: BAT 5	1.3.1	CC	CC	Closed loop system will be used to enable recycling of water.	Validate ongoing compliance by Inspection
Energy consumption: BAT 6	1.2.1	CC	CC	Evidence provided identifying application of (a range) of techniques associated with BATC 6.	Validate compliance by Inspection
Odour control: BAT 7	3.3.1	CC	CC	Low storage times of raw materials. Biocides will be added to the recycled water tank if required. Tanks will be cleaned weekly. OMP in place. Considerations to odour from the dryer will be assessed with PO2. See key issues of this document for further information.	Validate compliance by inspection.
Monitoring process: BAT 8	3.5.1	CC	CC	No requirements to monitor key process parameters to air. Metals and Hazardous Pollutants will be monitored on discharges to sewer.	None.
Monitoring air: BAT 9	3.5.1	CC	CC	Regulation 60 response confirms no chemical pulping occurs	None
Monitoring water: BAT 10	3.5.1	CC	CC	No direct discharge to water. Metals and Hazardous Pollutants will be monitored on discharges to sewer.	None
Waste management: BAT 12	1.4.1	CC	CC	Evidence provided that waste is segregated for application of	Validate compliance by inspection.

Compliance Issue Priority BAT indicated in Bold Text	Relevant Permit Condition	Compliance stated by Operator CC/FC/ NC/NA	Compliance assessment conclusion CC/FC/ NC/NA	Summary of Permitting Officer Assessment against BATc techniques	Compliance Action to Implement BAT Conclusions
				Waste Hierarchy Waste fractions of metals and plastics will be collected separately and sent offsite for recovery.	
Noise control: BAT 17	3.4.1	CC	CC	All processes will be carried out within the main building with the exception of the dryer. Considerations to noise from the dryer will be assessed with PO2. See key issues of this document for further information.	Validate compliance by inspection.
Decommissioning: BAT 18	3.1.6	CC	CC	There are no underground tanks. The whole site is located on sealed drainage. A decommissioning plan will be submitted to the Environment Agency for approval prior to closure.	None
Recycled Fibre raw materials: BAT 42	1.3.1	CC	CC	All paper is unloaded and stored inside the building. Waste handling and management taken place within the building. Transportation of materials within enclosed or sheeted vehicles.	Validate compliance by Inspection
Recycled Fibre water emissions: BAT 43	1.3.1	CC	CC	Potable water use will be minimised by recycling water via the closed loop system.	Validate compliance by Inspection
Recycled Fibre water	1.3.1 & 3.5.1	CC	CC	No direct discharge to water.	None

Compliance Issue Priority BAT indicated in Bold Text	Relevant Permit Condition	Compliance stated by Operator CC/FC/NC/NA	Compliance assessment conclusion CC/FC/NC/NA	Summary of Permitting Officer Assessment against BATc techniques	Compliance Action to Implement BAT Conclusions
AEL's: BAT 45				Trade effluent consent in place for discharges to sewer with Yorkshire Water.	
Recycled Fibre energy: BAT 46	1.2.1	CC	CC	Generally applicable for new plants and for existing plants in the case of a major refurbishment. Energy efficiency for the dryer is a requirement for PO2.	None
Note permit condition 2.3.1 will require Operate to operate as per Regulation 60 response documents referenced in Table S1.2.					

Fire Prevention Plan (FPP)

A fire prevention plan was requested by the Environment Agency due to the storage of combustible wastes.

Initially the FPP did not meet our minimum requirements. The operator resubmitted the FPP addressing missing information. Upon resubmission the operator satisfied all our minimum requirements with the exception of a suppression system for the internal storage of combustible materials.

The operator will only be storing small volumes of combustible materials at any one time, and the material will be delivered in the just-in-time system and not left inside the building overnight. Just-in-time is a system whereby material are delivered immediately before they are required in order to minimise storage time/costs. The operator has also confirmed that in the event of a fire, the burn time would not exceed the 3-4 hour guideline and therefore minimise the risk to human health. We have agreed in this case that a suppression system is not essential.

We agree the revised FPP provided with the application meets our requirements. Conditions for fire prevention have been added to the permit and we have incorporated the FPP into table S1.2 (operating techniques) of the permit.

Odour Management Plan

An odour management plan was provided following a request for more information by the Environment Agency. The nearest residential property is approximately 250m from the proposed development. The site is located adjacent to the existing recycling and energy recovery facility (RERF) facility. There are potential sources of odour from the installation, however the majority of these sources are contained within the main building, which will be fitted with roller shutter doors.

The wastes accepted are paper and cardboard. Some of the waste will originate from black box collections therefore it must be considered that the paper and cardboard may be contaminated to some degree and therefore potentially odorous. Waste deliveries will only occur during the operational hours of the adjacent RERF. A waste acceptance procedure is in place to ensure that malodorous wastes are not accepted on site. The storage of wastes will be kept to a minimum, the waste will be delivered on a just in time basis and will typically spend less than 24 hours in storage prior to processing.

Once the pulping process is complete, water is drained from the pulp using a screw press. The water is transferred to a recycled water tank, if odour occurs a biocide will be dosed into the tank. General housekeeping will be kept to a high standard to minimise odours.

A pre operational condition for future development is listed in the permit for a dryer (PO2) in case the operator decides to dry the pulp at some point in the future. The dryer has not been considered during this determination. Odour from the dryer will be considered within the information to be provided under the requirements of PO2.

We agree the odour management plan is adequate and controls and operational procedures are in place to minimise odour where possible.

Noise

The site is located adjacent to existing industrial premises and therefore the site has an elevated background noise level. The nearest residential property is 250m from the installation boundary and screened by structures and buildings. The majority of the activities will take place within the main building.

Vehicle movements will be kept to a minimum as a maximum of 20 tonnes of waste will be processed daily. The vehicles will be travelling at a slow speed from the adjacent RERF only. HGVs will be instructed to avoid leaving engines running, modern and well maintained plant will be used at all times and equipment (including vehicles) will be shut down when not in use.

The only substantial equipment located outside of the main building would be the dryer. The operator may decide to dry the pulp in a dryer at some point in the future, but this has not been considered in this determination. Noise must be considered within the information to be provided under pre-operational measure PO2.

We consider the assessment of noise impact from the installation is satisfactory for the proposed activities. The impact of noise from the installation should be low considering the nature of the operations proposed, the majority of activities will take place within the main building and the impact of noise from the dryer will be considered with PO2.

Dust

The waste acceptance procedure states that wastes containing dusts, powders or loose fibres will not be accepted at the installation. Wastes will be stored inside the main building. All loads of wastes will be sheeted when entering the site. There will be a visual inspection of dust levels completed as a daily inspection routine and a good level of housekeeping maintained.

The operator may decide to dry the pulp in a dryer at some point in the future, but this has not been considered during this determination. Particulate emissions from the dryer must be considered within the information to be provided under pre-operational measure PO2.

We agree with the operator that emissions of dust should be low from the proposed operations at the installation. Particulate emissions from the dryer will be considered with PO2.

Monitoring Requirements - Sewer

Water Framework Directive (WFD)

Priority pollutants under the WFD hazardous pollutants regime have been identified. We have required the Operator to monitor their discharge to sewer for these substances to help assess any potential sources of these pollutants. We have included a standard suite within the permit consistent with the all of the other sites in this sector.

Metals

Various metals are required to be monitored within the Pulp & Paper BREF.

The BREF states “relevant metals” and provides the following as examples: Zinc (Zn), Copper (Cu), Cadmium (Cd), lead (Pb), Nickel (Ni).

Our data would indicate adding mercury (Hg) is warranted due to its widespread presence in the environment and some effluents. We have therefore included a twice annual screen for the following metals: Zn, Cu, Cd, Pb, Ni & Hg.

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 consultation	The consultation 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 our guidance on legal operator for environmental permits.	✓
European Directives		
Applicable directives	All applicable European directives have been considered in the determination of the application.	✓
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.	✓
Site condition report	The operator has provided a description of the condition of the site. We consider this description is satisfactory. The decision was taken in accordance with our guidance on site condition reports and baseline reporting under IED– guidance and templates (H5). Sufficient information has been supplied to describe the condition of the site at permit issue. The baseline assessment indicates that no significant contamination is present.	✓

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>There are 6 local wildlife sites within 2,000m of the installation. The closest (Waterloo Sidings) is 731m from the installation.</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>	✓
Environmental Risk Assessment and operating techniques		
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>	✓
Operating techniques	<p>We have reviewed the techniques used by the operator and compared these with the relevant guidance notes.</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.</p>	✓
The permit conditions		
Waste types	<p>We have specified the permitted waste types, descriptions and quantities, which can be accepted at the regulated facility.</p> <p>Table S2.2 of the permit lists the waste types, throughput and storage capacities.</p> <p>We are satisfied that the operator can accept these wastes for processing within the proposed activities listed in table S1.1.</p> <p>We made these decisions with respect to waste types in accordance with How to comply with your environmental permit EPR 6.01 Paper and Pulp and Best Available Technique (BAT) reference document for the production of pulp, paper and board, 2015.</p>	✓

Aspect considered	Justification / Detail	Criteria met
		Yes
Pre-operational conditions	<p>Based on the information in the application, we consider that we need to impose pre-operational conditions.</p> <p>One pre-operational measure has been included within the permit (PO1). A site drainage plan has not been provided with the application. This is because the site is yet to be completed. Upon completion of the site a site drainage plan will be submitted to the Environment Agency for approval prior to operations commencing at the installation.</p> <p>One pre-operational measure for future development has been included within the permit (PO2). The operator may or may not dry the paper pulp at the installation. Because this operation is undecided at permit issue no technical information has been provided on the dryer and therefore technical assessment has not been completed. The dryer has been included within the permit, but commissioning/operation of the dryer is linked to the pre-operational measure PO2. Whereby the operator must provide all technical information and an assessment of risk (air emissions, odour, noise and fugitive emissions) for approval by the Environment Agency.</p>	✓
Incorporating the application	<p>We have specified that the operator 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>	✓
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 monitor total and dissolved metals and hazardous pollutants in the discharges to sewer. See key issues for further information.</p> <p>We made these decisions in accordance with EPR 6.01.</p>	✓
Reporting	<p>We have specified reporting in the permit.</p> <p>We made these decisions in accordance with EPR 6.01.</p>	✓
Operator Competence		
Environment	There is no known reason to consider that the operator will not	✓

Aspect considered	Justification / Detail	Criteria met
		Yes
management system	have the management systems to enable it to comply with the permit conditions. The decision was taken in accordance with our guidance on how to develop a management system for environmental permits.	
Relevant convictions	<p>The National Enforcement Database has been checked to ensure that all relevant convictions have been declared. No relevant convictions were found.</p> <p>The operator satisfies the competence requirements for environmental permits.</p>	✓

Annex 2: Consultation responses

Summary of responses to consultation and the way in which we have taken these into account in the determination process.

No responses were received from the Fire and Rescue service or the Health and Safety Executive.

Response received from
Leeds City Council – Planning Department (response received 02/06/16)
Brief summary of issues raised
<p>Planning conditions have been highlighted of interest for the installation.</p> <ul style="list-style-type: none">• Open topped wagons shall be netted• No wastes should be stored outside buildings• No external lighting shall be installed• An odour management plan should be submitted• A sound installation scheme should be designed to protect the amenities of nearby commercial properties.• Surface water from hard standing areas shall be passed through an interceptor prior to discharge.• The site shall have separate system for foul and surface water• Surface water drainage scheme shall be submitted• Only paper and cardboard shall be accepted up to 20,000 tonnes per year• Prior to the commencement of development a Phase II Report concerning shallow mining works and land contamination shall be completed and where remediation is highlighted as necessary shall be completed <p>Planning Services have not received any complaints or taken action in terms of amenity or noise issues in relation to the compound or ERF in the last two years. The Local Planning Authority expect that the conditions of the permit would provide a mechanism to protect against harm to amenity (including noise nuisance).</p>
Summary of actions taken or show how this has been covered
No further action required.

Response received from
Leeds City Council – Environmental Protection Team (response received 02/06/16)
Brief summary of issues raised
<p>Environmental Health Services (EHS) have no comments in relation to particulates. Approximately 6 complaints of odours have been received from the vicinity of the installation within the last 12 months. Although these incidents have either not been substantiated or referred to partner agencies. EHS highlights it does indicate that the closest residential occupants can be affected by industrial processes in this location.</p> <p>EHS does not anticipate that noise issues will be a concern to the nearest noise sensitive receptors. The occasional complaint of noise has been received from the vicinity of the application site within the last 12 months, but the complaints are not directly relevant to these proposals. EHS highlights a formal assessment of noise has not been completed for the proposed installation and therefore states a degree of uncertainty of the likely impact remains.</p> <p>EHS suggests noise and vibration, emissions to air, and the release of odours from</p>

the installation should be fully considered as part of the permit application process; with appropriate measures to protect the amenity of nearby residents imposed as conditions of any permit issued. To ensure the proposed installation will not result in an unacceptable loss of amenity to local residents and the wider environment, and that the best available techniques are used to minimise any impact that is caused.

Summary of actions taken or show how this has been covered

We have considered noise & vibration, emissions to air and the release of odours as a part of the determination process, see key issues of this document for further information. The general conditions within the permit will cover amenity issues such as odour, noise and emission control.

The impact of the dryer has not been considered under this permit determination and will be consider upon submission of all documents required under pre-operational measure PO2 if the operator is to decide to start drying the pulp within the installation. PO2 states that the operator must complete an assessment of risk from; air emissions (particulates), odour, noise and fugitive emissions.