

Environment Agency permitting decisions

Bespoke permit

We have decided to grant the permit for HRUK Slinfold Site operated by Hensel Recycling (UK) Ltd.

The permit number is EPR/EP3439DW

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

- Description of main features of the installation
- Key issues
- Annex 1 the decision checklist
- Annex 2 the consultation, web publicising responses

Description of the main features of the Installation

The installation will treat hazardous and non-hazardous vehicle catalytic converters units for recovery and process the honey comb cores for further offsite recovery of precious metal content.

This will take place under the following scheduled activities:

- S5.3 Part A(1) a ii – Disposal or recovery of hazardous waste with a capacity exceeding 10 tonnes per day involving physio-chemical treatment.
- S5.6 Part A(1) (a) – temporary storage of hazardous waste with a total capacity exceeding 50 tonnes pending any of the activities listed in sections 5.1, 5.2, 5.3.

The installation will also undertake directly associated activities based on the hazardous waste treatment activities being the majority user of the shearing and ball mill activities.

This will include the

- treatment and storage of non-hazardous catalytic converter units separated from hazardous loads
- milling of ceramic cores received as separate fractions.

All operations will take place within a building, excluding the storage of uncontaminated scrap metal which will be stored outside the building in a covered skip during the day.

Annual throughput for the site including storage and treatment will not exceed 5000 tonnes. The total storage capacity of the site is 150 tonnes at any one time. There are no point source emissions from the activity.

Key issues of the decision

Hazardous waste management and acceptance

The site will accept hazardous waste in the form of refractory ceramic fibre (RCF) contained within catalytic converters as a protective matting. Waste containing RCF will be sorted and subjected to the shearing process to remove outer metal casings and the RCF matting will be removed.

Measures to manage the risk associated with this waste include but are not limited to:

- All hazardous waste received and processed on the site will be stored in rigid containers on a concrete floor in a designated storage area within an enclosed building. RCF matting removed from converter units will be stored in sealed containers lined with 400-gauge polyethylene bags and will be labelled appropriately with a unique reference, date and hazard classification (HP07 for RCF matting); and
- Mechanical treatment of converters containing RCF and manual removal of RCF from converters will take place under local extraction ventilation recirculation system with HEPA filter which discharges within the building.

We have assessed the operator's proposal for managing hazardous waste in line with the requirement of our guidance and are satisfied that they are in line with Best Available Techniques.

External metal skip

Only uncontaminated scrap metal is stored outside on hard standing, in a sheeted 40 yard skip during the working day. At night, the skip is brought inside the enclosed building.

Noise management

The operator has identified the potential risk of noise emissions from the installation due to the physical nature of the treatment activities on site. To manage the risk of impact on nearby receptors the operator has proposed the following measures:

- All operations are enclosed within a building which is regularly inspected and maintained;
- Building doors are kept closed when deliveries and collections are not being made;
- All equipment is subject to regular maintenance and inspection; and
- Operating hours are restricted to daytime hours.

We have assessed the operator proposal for managing the risk of noise emissions in line with the requirement of our guidance and are satisfied the measures represent Best Available Techniques.

Dust management

The operator has identified the potential risk of dust emissions from the installation due to the nature of the treatment activities on site. To manage the risk of impact on nearby receptors the operator has proposed the following measures:

- Dust is collected in Local Exhaust Ventilation (LEV) and HEPA filters and will be analysed to determine valuable metal content prior to disposing of waste off site;
- All areas are tarmac or concrete and the site is subject to a regular cleaning regime;
- Process equipment is cleaned between batches to remove particulates;
- A misting system is in place within the building to suppress the generation of particulates;
- All operations are enclosed within a building from waste acceptance to storage prior to being sent off-site;
- Waste is delivered to site and stored in intermediate bulk containers, metal cages or barrels; and
- All vehicles delivering and collecting material to and from the site will be covered.

We have assessed the operator proposal for managing the risk of dust emissions in line with the requirement of our guidance and are satisfied the measure represent Best Available Techniques.

Fire prevention Plan (FPP)

We have not required a FPP for the site. FPPs are not required for hazardous wastes (compliance with SGN S5.06 is required instead), and the non-hazardous wastes present on site are not considered to pose a significant fire risk due to their nature.

Annex 1: decision checklist

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

Aspect considered	Justification / Detail	Criteria met
		Yes
Receipt of submission		
Confidential information	A claim for commercial or industrial confidentiality has not been made.	✓
Identifying confidential information	We have not identified information provided as part of the application that we consider to be confidential. The decision was taken in accordance with our guidance on commercial confidentiality.	✓
Consultation		
Scope of consultation	The consultation requirements were identified and implemented. The decision was taken in accordance with our Public Participation Statement and our Working Together Agreements. For this application we consulted the following bodies: <ul style="list-style-type: none"> • Director of Public Health • Environmental Health and Licensing Department Horsham District Council • Public Health England • Health and Safety Executive 	✓
Responses to consultation and web publicising	The web publicising and 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 what a legal operator is.	✓
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.	✓
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).	✓
Biodiversity, Heritage, Landscape and Nature Conservation	The application is within the relevant distance criteria of a site of heritage, landscape or nature conservation, and/or protected species or habitat . 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 sites.	✓

Aspect considered	Justification / Detail	Criteria met
		Yes
Environmental Risk Assessment and operating techniques		
Environmental risk	We have reviewed the operator's assessment of the environmental risk from the facility. The operator's risk assessment is satisfactory.	✓
Operating techniques	We have reviewed the techniques used by the operator and compared these with the relevant guidance notes. <ul style="list-style-type: none"> • The process is enclosed within a building • All surfaces are impermeable and the site has sealed drainage • The site utilises a HEPA abatement system to manage dust on site • All waste is received with containers • The operator has confirm they will operate the site in line with the requirement of our S5.06 guidance Please refer to key issues section for dust, noise and hazardous waste management techniques.	✓
The permit conditions		
Waste types	We have specified the permitted waste types, descriptions and quantities, which can be accepted at the regulated facility.	✓
Incorporating the application	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. These descriptions are specified in the Operating Techniques table in the permit.	✓
Emission limits	We have decided that emission limits should not be set in the permit as there are no point source emissions from the site.	✓
Operator Competence		
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 taken in accordance with our guidance on what a competent operator is.	✓
Technical competence	Technical competency is required for activities permitted. The operator is a member of an agreed scheme.	✓
Relevant convictions	The Case Management System has been checked to ensure that all relevant convictions have been declared. No relevant convictions were found.	✓
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 our guidance on what a competent operator is.	✓

Annex 2: Consultation and web publicising responses

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

Response received from
Horsham District Council - Environmental Health
Brief summary of issues raised
No objections to site's continued operation and the issuing of an environmental permit. Recommend to include the requirement to implement a noise management plan and a dust management plan.
Summary of actions taken or show how this has been covered
We have reviewed the operator's proposal for managing dust and noise emissions from the site and are satisfied that the appropriate measures are in place to prevent impact (refer to key issues section). In addition the permit conditions 3.2 and 3.4 require the operator to ensure the site is free of emissions likely to pollution outside the site and contain the requirement to submit a management plan to the Environment Agency for approval in the event the site gives rise to pollution.

Response received from
Public Health England
Brief summary of issues raised
<ul style="list-style-type: none"> • Ensure that the following potential emissions do not impact upon public health: fugitive dust and particulate matter from site activities. • Ensure that there are adequate plans and procedures in place for fires and waste acceptance and rejection to prevent any potential significant off site impact. • PHE has no significant concerns regarding risk to health of the local population from this proposed activity, providing that the applicant takes all appropriate measures to prevent or control pollution, in accordance with the relevant sector technical guidance or industry best practice. • We recommend that the Environment Agency also consult the local authority, the Food Standards Agency and the Director of Public Health.
Summary of actions taken or show how this has been covered
<p><u>Control of particulate matter</u></p> <p>The operator has demonstrated that they have appropriate measures in place to manage dust emissions from the site, including undertaking all activities within a building, dust extraction and abatement, good housekeeping and dust suppression measures. We have reviewed these proposals and are satisfied they are in line with best available techniques. In addition, to ensure these emissions do not cause pollution we have inserted condition 3.2 which requires the operator to prevent pollution and if activities give rise to emissions to submit a management plan to the Environment Agency to prevent emissions.</p> <p><u>Plans in place for fires</u></p> <p>Due to the nature of the site and the wastes types the risk of waste fire is considered low. The operator has therefore addressed any potential risks in their accident management risk assessment and demonstrated what management and mitigation measures they have in place to control fires. We have assessed the operator's proposals and are satisfied the measure are appropriate.</p> <p><u>Waste acceptance and rejection</u></p> <p>The operator has outlined their acceptance and pre acceptance procedures and demonstrated that they will have appropriate procedures in place to appropriately identify the incoming waste types. Due to the nature of the waste, catalytic converters are accepted as hazardous waste and their hazardous content determined once received at the site where they can be cut open under appropriate conditions to manage the risk involved. We have assessed the operator's proposals and are satisfied the measures represent best available techniques in line with the requirements of our guidance.</p>

Relevant sector guidance

The operator has confirmed that they will undertake activities in line with the requirement of our guidance and Sector Guidance Note S5.06.

Consultation with other bodies

We have consulted the Local Authority, and the Director of Public Health. We have not consulted the Food Standards Agency as the site does not meet the criteria of the Environment Agency and Food Standards Agency working together agreement.