

# Review of an Environmental Permit under the Environmental Permitting (England & Wales) Regulations 2016 (“EPR”)

## Decision document recording our decision-making process

We have decided to vary the Permit for Sacker’s Metal Recycling Facility operated by S. Sacker (Claydon) Limited, as a result of an application made by the Operator.

The Permit number is EPR/LP3432WF.

The Variation notice number is EPR/LP3432WF/V004.

## What this document is about

This is a decision document, which accompanies a variation notice.

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.

## Preliminary information and use of terms

We refer to the Permit (both existing and as varied) as “the **Permit**” in this document; and to the variation of the Permit as “the **Variation**”.

The Operator of the Installation is S. Sacker (Claydon) Limited: we call S. Sacker (Claydon) Limited “the **Operator**” in this document. We refer to S. Sacker (Claydon) Limited’s Sacker’s Metal recycling Facility as “the **Installation**”.

The Application was duly made on 26/09/2014.

## How this document is structured

- Our decision
- The legal framework
- How we took our decision
- Key issues in the determination
- Annex 1 – the decision checklist
- Annex 2 – web publicising

### 1 Our decision

We have issued a Variation, which will allow the Operator to operate their facility as an Installation, subject to the conditions in the varied Permit.

This Variation does several different things:

- **First**, it gives effect to our decisions following the identification of the Operator as undertaking a “newly prescribed activity” (NPA) under the Industrial Emissions Directive (IED);
- **Second**, it takes the opportunity to bring earlier variations into an up-to-date, consolidated Permit. The consolidated Permit should be easier to understand and use; and
- **Third**, it modernises the entire Permit to reflect our current template. The template reflects our modern regulatory permitting philosophy and was introduced because of a change in the governing legislation. This took place when the Pollution Prevention and Control (England and Wales) Regulations 2000 (“PPC”) were replaced in 2008 by a new statutory regime under the Environmental Permitting Regulations 2007 (now the 2016 version).

The introduction of new template conditions makes the Permit consistent with our current general approach and philosophy. Although the wording of some conditions has changed, while others have disappeared because of the new regulatory approach, it does not affect the level of environmental protection achieved by the Permit in any way.

We consider that, in reaching our decision, we have taken into account all relevant considerations and legal requirements and that the Permit will continue to ensure that a high level of protection is provided for the environment and human health.

The original Permits, issued on 21/09/1990 and 22/10/2003 and subsequently consolidated on 08/11/2010, ensured that the facility, would be operated in a manner which would ensure the protection of the environment specified in the existing Guidance at the time. To the extent that we have substantively altered the Permit as a result of this variation, the new requirements will deliver a higher level of protection to that which was previously achieved.

As we explained above, we do not address changes to the Permit in this document, to the extent that they give effect to either the consolidation of earlier variations, or introduce new template conditions.

## **2 The legal framework**

The original Permit ref 907/01/18/03 (EPR/ZP3695NS) was granted on 21/09/1990 as a Waste Disposal License under the Control of Pollution Act 1974, which was superseded by the Environmental Protection Act 1990.

The original Permit REF EAWML 71321 (EPR/LP3494NX) was granted on 22/10/2003 under the Environmental Protection Act 1990 and regulated under the Waste Management Licensing Regulations 1994.

The Installation will be subject to the requirements of the Industrial Emissions Directive (IED) 2010/75/EU and regulated under the Environmental Permitting (England and Wales) Regulations 2016 (SI 2016 No 1154). The IED was transposed in England and Wales by the Environmental Permitting (England and Wales)(Amendment) Regulations 2013 on 27 February 2013.

The IED seeks to achieve a high level of protection for the environment taken as a whole from harmful effects of industrial activities. It does so by requiring each of the industrial installations to have a permit from the competent authority (in England, the Environment Agency, or for smaller Installations, the relevant Local Authority). The IED has increased the number of activities that require an Installations permit. These are predominantly regulated as “waste operations” and include (when exceeding specific thresholds described in IED):

- hazardous waste treatment for recovery;
- hazardous waste storage;
- biowaste treatment – recovery and/or disposal;
- treatment of slags and ashes
- metals shredding;
- pre-treatment of waste for incineration/co-incineration;
- biological production of chemicals; and
- independently operated wastewater treatment works serving only industrial activities subject to the Directive

Article 11 of the IED requires the relevant authority (the Environment Agency in this case) to ensure that the Installation is operated in such a way that all the appropriate preventative measures are taken against pollution, in particular through the application of Best Available Techniques (BAT). Under Article 15(2), the Permit must contain emission limit values (ELVs) (or equivalent parameters or technical measures) for any pollutants likely to be emitted from the Installation in significant quantities. These ELVs are to be based on BAT, but also on local factors and EU Environmental Quality Standards. The overarching requirement is to ensure a high level of protection for the environment and human health.

We are required by Article 13 of the IED to keep abreast of developments in BAT. In addition, Article 13 requires us to carry out a periodic review of the permit's conditions, and to update them if necessary.

The IED also requires the European Commission to organise an exchange of information between EU Member States so that what are known as BAT reference documents (or BREF notes) can be published, creating a level playing field across the EU, providing a consistent set of standards for new plant, to which regulatory authorities in the Member States can then have reference. These BREF notes are the basis for our own national sector technical guidance. The Commission is also required to update BREF notes on a regular basis. The waste treatment BREF notes are currently being reviewed and a final issue date is anticipated in 2017. Under the IED, all permits will be subject to review within four years of the publication of revised BREF notes. This means that we will need to do a further review against any new standards in the BREF notes at sometime in the future.

The IED is to be implemented over several years commencing from 7 January 2013. For existing installations operating "newly prescribed activities", the relevant date for implementation is 7 July 2015.

### **3 How we reached our decision**

It is the Operators responsibility to ensure they are correctly regulated for the activities they are carrying out. Following adoption of the IED, the Environment Agency has engaged in a range of briefings and communications with the waste industry sector to raise awareness of the implications of the Directive and the need to ensure their facilities are correctly regulated (particularly after the implementation date of 7 July 2015 for newly prescribed activities).

Early in 2014, the Environment Agency provided further briefings to industry trade bodies and wrote to operators we believed may be implicated by these changes. We provided detailed information sheets that described the implications and the process operators should follow if they decided to have their activities permitted as Installations.

We confirmed that most facilities fell into one of two groups:

- Facilities permitted from April 2007  
When these facilities were permitted, a thorough assessment would have been carried out to confirm whether the proposed activities were using "appropriate measures" as a standard to protect the environment.

This standard of protection is the same standards that would have been assessed against had the facilities applied as an Installation activity (i.e. BAT). The permit would have also been issued with modern conditions that ensured protection of the environment.

We consider that these facilities are effectively 'IED-compliant' in terms of the technical standard of the facility with the exception of the "newly prescribed activity". For these facilities, we consider that, in general, no further technical assessment is required, so administrative variations are an appropriate mechanism to show the activities as Installation activities. The administrative variation is a necessary route for the Operator to formally ask for this activity to be included in their permit and for us to advertise that request on our Public Register.

It is understood that the Environment Agency granted permits for new waste activities under the Waste Management Licensing Regulations 1994 beyond April 2007. Where a facility falls into this group, the Environment Agency shall determine whether or not the application was assessed using "appropriate measures". Where it is determined that the application was assessed using "appropriate measures", the application will be designated as an "administrative variation".

- Facilities permitted before April 2007  
For these facilities, a "normal" or "substantial" variation is appropriate because a detailed technical assessment is required on aspects of the Application ecological impact assessment, waste types, secondary containment etc. in addition to the administrative changes. Substantial variations will only be relevant where the newly prescribed activity is being added to an existing installation permit.

#### This Variation

The original Permit was granted on 22/10/2003 and subsequently varied on 07/11/2008 and 08/11/2010 (consolidated with EPR/ZP3695NS). We have reviewed the documentation submitted in support of the original permit and subsequent variation application(s) in this determination. We are not satisfied that the standard of protection was assessed using appropriate measures. We have determined this Application as a normal variation. As the Variation will not have any negative effects on the environment, it is not a substantial variation and so does not require consulting on.

## **4 Key issues in the determination**

### 1. Operating techniques

#### **Pre-acceptance of waste and acceptance of waste**

The fragmentiser plant treats only non-hazardous metal wastes. Waste acceptance procedures are in place for the site and the shredder, detailed in the Working Plan (Appendix 18). There is also a risk assessment and procedures for the control of fragmentiser explosions (Appendix 31 of the application) in place. We have not assessed the existing procedures for waste operations on site.

We have imposed the following improvement conditions for the operator to improve waste pre-acceptance and acceptance procedures to implement BAT for the sector: IC1: BAT assessment for baled wastes; IC2: Provision of BAT

operating procedures for the metal shredding activity and DAAs. As part of the standard suite of conditions for metal shredders under IED we have set additional conditions regarding monitoring of radioactive substances (conditions 3.6.1 – 3.6.7) in incoming loads. This is because radioactive items are periodically found at metal recycling sites and in the scrap metal feedstock delivered to metal smelting sites.

### **Storage and handling of waste**

All off-loading, storage and quarantine areas are fitted with impermeable surfacing and sealed drainage system which discharges to sewer via an interceptor. The Fragmentiser Plant and Shredder Residue Plant and sorting plants are within buildings.

We have imposed the following improvement conditions for the operator to improve waste storage and handling to implement BAT for the sector: IC2: Provision of BAT operating procedures for the metal shredding activity and DAAs; and IC3: Provision for minimising dust and particulates from conveyors.

### **Process (treatment) description**

A process diagram is included in Appendix 37 of the application. The installation includes the following:

- Infeed shredder storage (3500 tonnes capacity);
- Pre-shredder (200 tonnes/day capacity);
- Shredder Plant with magnetic and eddy current separators (350 tonnes/day capacity);
- Shredder residue plant and sorting (capacity 70 tonnes/day) to recover further metal/plastic, with storage for recovered material (700 tonnes capacity);
- compaction/baling (capacity 80 tonnes/day – includes other waste streams for combustion or disposal), and storage (500 tonnes capacity).

The site also has the following non-installation activities:

- Depollution of ELVs (60 tonnes capacity un-depolluted vehicles, 15 tonnes/day treatment capacity);
- Non-hazardous metal storage (non-fragmentised, 1500 tonnes capacity);
- Non-hazardous waste storage and transfer (500 tonnes storage capacity);
- Hazardous waste storage other than ELVs (principally hazardous WEEE, storage capacity 20 tonnes).

The Fragmentiser Plant is a Lynxs TMR shredder with a capacity of 350 tonnes/day. It is a wet type (foam and water), abated by a cyclone system and wet scrubber, before discharging to air via a stack (emission point A1).

The Shredder Residue Plant shredder is a Key Machinery GmbH (MC2) with a capacity of 70 tonnes/day, dry shredder which discharges to air (emission point A2) via an air filtration plant (bag system).

#### **Fugitive emissions to air**

Fugitive emissions to air from the shredding process include particulate from storage, handling and treatment of material awaiting shredding and the process residues. The treatment processes are contained within buildings. Storage areas for fragmentiser residues are not within a building.

#### **Fugitive emissions to surface and groundwater (secondary containment, site drainage plan)**

The facility has an impermeable surface and sealed drainage system draining to sewer via an interceptor. Procedures are in place for the waste operations on site, to ensure these are not likely to give rise to fugitive emissions (spillage control procedures, bunding of tanks etc). We have not reviewed the procedures not connected with the installation. IC2, already discussed, will require the operator to review their operating procedures for the installation activities and implement BAT.

#### **Odour Management Plan (OMP).**

There is no OMP for the installation activity. The operator has previously drafted a plan for the existing facility as a result of historic odour complaints, but this is not yet in place. From a check of our records, the last complaint was in 2014. The installation activities are not considered to be a significant odour source, and an OMP is not a usual requirement for a metal shredding installation.

We have therefore imposed our template permit condition for odour, which requires the operator to take measures to control odour so as not to cause pollution. This also gives the option of requiring an OMP at a later date if there are further odour issues.

#### **Noise Management Plan (NMP)**

Noise is considered a key issue for metal shredding sites. The facility has residential receptors in close proximity to the site boundary. The operator submitted a noise report including a NMP with the application, however this was out of date by the time of determination. We asked for an update on progress with the mitigation measures proposed for the site. They responded that:

*Environment Agency lead improvement plan in 2015 included the installation of the fence line, pre-shredder improvement works i.e. dustbuster and relocation of the shear. This was completed and closed off. No further noise monitoring was requested and no formal noise management plan requested as it was agreed verbally they would see*

*whether the improvements made in 2015 reduced the noise complaints. It can be confirmed that no noise complaints have been received in 2016 and therefore no further requests from the Environment Agency have been made for noise monitoring.*

We have set our template permit conditions require the operator to take measures to control noise so as not to cause pollution. We have also requested via an improvement condition (IC8) a revised NMP, in accordance with our sector guidance S5.06 and H3 Noise Guidance.

### **Point source emissions to air, water or land**

There are no point source emissions to water from the site. The site discharges all surface water to sewer as described above.

We have not set any emission limits in table S3.2 for the existing discharge to sewer. We have set an improvement conditions (IC4) for the operator to undertake representative monitoring of the discharge to sewer, and (IC5) for them to assess emissions in accordance with our H1 methodology.

There are point source discharges to air from the Fragmentiser Plant exhaust (A1) and Shredder Residue Plant exhaust (A2) as discussed above. We have set a limit for total suspended particulates of 20 mg/m<sup>3</sup> for emission points A1 and A2 in table S3.1. This is in accordance with the requirements for the metal shredding sector and is set out in our template IED permit.

We have set an improvement condition (IC6) for the operator to undertake representative monitoring of the discharge to air (and also for ambient air around the site) and then to assess emissions in accordance with our H1 methodology. This will also include (via improvement condition IC7) a monitoring programme to carry out particle size distribution testing of particulate from emissions points A1 and A2 to determine the fraction within the PM<sub>10</sub> and PM<sub>2.5</sub> ranges.

### **Monitoring**

We have set monitoring for A1 and A2 for Total suspended particulates in table S3.1. We have imposed ambient air monitoring for particulate in table S3.3. These are standard requirements for metal shredding installations, and is required quarterly unless otherwise agreed.

We have not set any monitoring requirements on the discharge to sewer.

We have imposed (via table S3.4) regular noise monitoring, at locations and at a frequency to be to be agreed in the updated Noise Management Plan, using the BS 4142:2014 methodology.

### **Accidents**

We have assessed the accident risks from the installation activities – risks from the other waste operations were not reviewed.

The operator has submitted the following:

Accident Management Plan (AMP) (Appendix 26);



Environmental Risk Assessment (ERA) including partial H1 Assessment (Appendices 8 and 24);  
Risk Assessment for Shredder Explosions (Appendix 36).

The AMP covers spillages, fires (including within the shredder), discovery of asbestos in waste and discovery of munitions. The ERA also considers the impact of fires and flooding (the site is not within a flood risk area).

The most likely source of a fire on site is the shredder activity. The separate shredder risk assessment covers this in more detail. The shredder is fitted with a firefighting system that can flood the shredder chamber and external conveyor belts. The installation is not subject to a Fire Prevention Plan as there is no increase in fire risk as a result of this IED variation. We have applied the standard fire prevention condition in the permit.

## 2. Waste types

The operator submitted a waste list using European Waste Catalogue (EWC) code for the shredder activity. All these codes are already permitted for the existing facility, and appear suitable for shredding (see table S2.2 in the permit). We are satisfied that the operator can accept these wastes because they have the necessary infrastructure, operating systems and technical capability to manage these wastes in an appropriate manner.

In addition to the IED variation, the operator submitted an administrative variation (EPR/LP3494NX/V005) to add two waste codes to the existing waste operations on site.

16 01 21\*: this is due to reclassification of catalytic converters containing refractory ceramic fibres as hazardous waste – this site already accepts the waste type and there is no change to site operations.

19 12 12: other wastes (including mixtures of materials) from mechanical treatment of wastes other than those mentioned in 19 12 11. The operator takes this waste as metal residues from mechanical shredding of waste to put it through the Shredder Residue Plant. It is received from other shredder sites that do not have the downstream shredding process, therefore the operator can perform further treatment on the material to recover more metal. This material will not go through the Fragmentiser Plant because it has already gone through a fragmentiser.

We are satisfied that the operator can accept these wastes because they have the necessary infrastructure, operating systems and technical capability to manage these wastes in an appropriate manner.

## 3. Ecological impact assessment (where relevant)

We have assessed the impact of the site on the following ecological sites:  
Ramsar/Special Protection Area (SPA)  
Stour & Orwell Estuaries

#### Sites of Special Scientific Interest (SSSIs)

Great Blakenham Pit  
Sandy Lane Pit, Barham  
Little Blakenham Pit

#### Local Wildlife Sites: (LWSs)

Barham Pits  
Shrubland Park  
Nursery Wood  
River Gipping (Sections)  
RNR 106  
Great Wood  
Great Blakenham Pit  
RNR 144  
Oak Wood and Broomwalk Covert  
Sharmford Mere  
RNR 165  
Great Blakenham Churchyard

#### Ancient Woodlands:

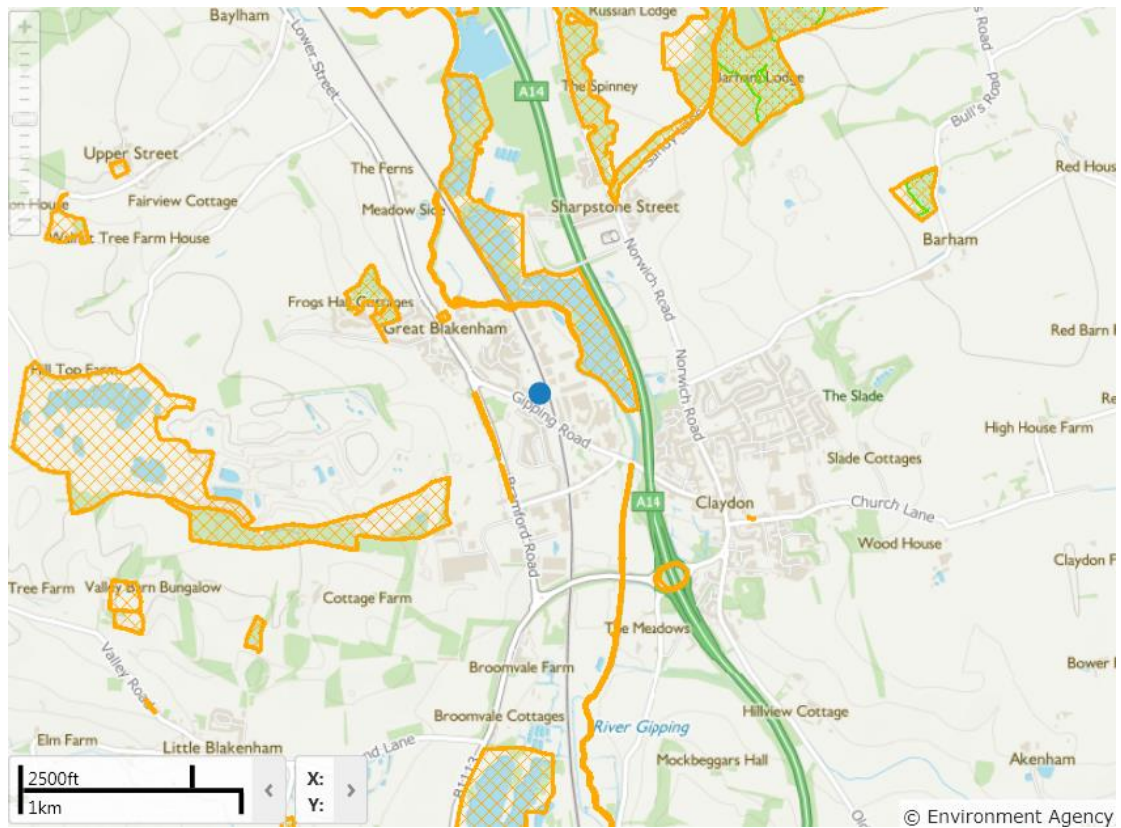
Oak Wood/Broomwalk Covert  
Great Wood  
Nursery Wood

The likely risks to the ecological sites are particulate matter and noise from the fragmentiser. We have concluded that the risks are acceptable. For the European sites an Appendix 11 was sent to Natural England, for information only. For the SSSIs an Appendix 4 was produced, detailing our assessment. The impact on the non-statutory sites is detailed below.

Particulate matter is not considered a toxic pollutant for ecological sites, but may cause smothering. Dust monitoring was undertaken in 2014 and the results submitted with the application. This showed levels of particulate well below 1 mg/m<sup>3</sup> in the immediate vicinity of the facility, so there is little risk of smothering effects at the ecological sites.

We consider that most of these LWSs are too far away (see plan below) to be affected by noise and emissions. Blakenham Pits LWS could be affected by the noise if it increases from the existing level. The wildfowl and other wildlife is generally acclimatized to the level of noise that has been going on for some time - this is an existing operational site. The operator submitted a noise report, which included a NMP, with actions to reduce noise (e.g. by enclosing noisy operations and establishing noise barriers, combined with a noise monitoring programme). We asked via Schedule 5 Notice for the operator to update us on progress with the actions. They stated that the actions were completed and no noise complaints were received in 2016.

## Location of Non-statutory Sites



Our template permit conditions require the operator to take measures to control noise so as not to cause pollution.

We have set an improvement condition for a revised NMP (see above). We have also set noise monitoring as in table S3.4 as discussed above.

We consider this is reasonable, as we have no record of noise disturbance to the LWS. The overall situation is one of a reducing noise source, as the operator is aiming to reduce noise at residential receptors which are closer to the site than the LWS.

- **Annex 1 – decision checklist**

This document should be read in conjunction with the Duly Making checklist, the application and supporting information and notice.

Aspect considered	Justification / Detail	Criteria met
		Yes
<b>Receipt of submission</b>		
Confidential information	A claim for commercial or industrial confidentiality has not been made.	✓
<b>Consultation</b>		
Responses to web publicising	<p>The web publicising responses (Annex 2) were taken into account in the decision.</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 our guidance on the meaning of operator.	✓
<b>The facility</b>		
The regulated facility	<p>The extent/nature of the facilities taking place at the site required clarification. The decision on the facility was taken in accordance with RGN 2 Understanding the meaning of regulated facility.</p> <p>The regulated facility is an installation which comprises the following activities listed in Part 2 of Schedule 1 to the Environmental Permitting Regulations and the following directly associated activities:</p> <ul style="list-style-type: none"> <li>• The metals shredding activity falls under S5.4A(1)(b)(iv) Recovery or a mix of recovery and disposal of non-hazardous waste with a capacity exceeding 75 tonnes per day involving treatment in shredders of metal waste.</li> </ul> <p>The following activities undertaken at the site are consider to form Directly Associated Activities to this listed activity:</p> <ul style="list-style-type: none"> <li>• In-feed storage of waste</li> <li>• Physical treatment for the purpose of recycling of shredded material</li> <li>• Storage of processed materials.</li> <li>• Site drainage discharge.</li> </ul> <p>The following waste operations are not covered by the IED, and are not deemed to be Directly Associated</p>	✓

Aspect considered	Justification / Detail	Criteria met
		Yes
	<p>Activities to the metal shredding. Therefore these remain permitted as Waste Operations:</p> <ul style="list-style-type: none"> <li>• Vehicle storage, depollution and dismantling (authorised treatment) facility.</li> <li>• Waste electrical and electronic (authorised treatment) facility</li> <li>• Metal Recycling</li> <li>• Non-hazardous waste transfer</li> </ul>	
<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	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.	✓
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>A full assessment of the application and its potential to affect the sites has been carried out as part of the permitting process. See key Issues section. We consider that the application will not affect the features of the sites.</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 unsatisfactory and required additional Environment Agency assessment to make up the shortfall.</p> <p>We have requested additional assessment of existing emissions via improvement conditions – see Key Issues section.</p>	✓
Operating techniques	<p>We have reviewed the techniques used by the operator and compared these with the relevant guidance notes:</p> <ul style="list-style-type: none"> <li>• IPPC S5.06 – Guidance for the Treatment of Hazardous and Non-Hazardous Waste;</li> </ul>	✓

Aspect considered	Justification / Detail	Criteria met
		Yes
	<ul style="list-style-type: none"> <li>• BRMA BAT recommendation document;</li> <li>• H3 – Noise assessment and control;</li> </ul> <p>See key Issues section for a review of the operating techniques.</p> <p>We consider that the operating techniques do not meet the technical standards specified in the guidance above. We consider that there are omissions in the supporting documents. We have therefore included an improvement condition in the notice which requires a review of the site's operating techniques within 6 months.</p>	
<b>The permit conditions</b>		
Updating permit conditions during consolidation	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 permit.	✓
Waste types	<p>We have specified the permitted waste types, descriptions and quantities, which can be accepted at the regulated facility. See key Issues section.</p> <p>We made these decisions with respect to waste types in accordance with our Technical Guidance WM3 – Guidance on the classification and assessment of waste.</p>	✓
Improvement conditions	<p>Based on the information on the application, we consider that we need to impose improvement conditions. See Key Issues section.</p> <p>We have imposed improvement conditions to ensure that:</p> <ul style="list-style-type: none"> <li>➤ the site's operating techniques/management system/plans are reviewed and updated against the standards specified in the technical guidance note(s): <ul style="list-style-type: none"> <li>• IPPC S5.06 – Guidance for the Treatment of Hazardous and Non-Hazardous Waste;</li> <li>• BRMA BAT recommendation document;</li> <li>• H3 – Noise assessment and control;</li> </ul> </li> <li>➤ appropriate management systems and management structures are in place and that sufficient financial, technical and manpower resources are available to the operator to ensure compliance with all the permit conditions.</li> <li>➤ appropriate measures are in place to ensure that accidents that may cause pollution are minimised.</li> </ul>	✓

Aspect considered	Justification / Detail	Criteria met
		Yes
	<ul style="list-style-type: none"> <li>➤ the appropriate measures are in place to prevent fugitive emissions.</li> <li>➤ the appropriate measures are in place to prevent annoyance from noise and vibration.</li> </ul>	
Incorporating the application	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. These descriptions are specified in the Operating Techniques table in the permit.	✓
Emission limits	<p>The following substances have been identified as being emitted in significant quantities and ELVs have been set for those substances:</p> <p>Point source emissions to air: Emissions from shredder of Total suspended particulate - 20 mg/m<sup>3</sup> (or other level agreed in writing with the Environment Agency).</p> <p>This is consistent with the metal shredding sector permit template.</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. See key Issue Section.</p> <p>Based on the information in the application we are not fully satisfied that the operator's techniques, personnel and equipment have either MCERTS certification or MCERTS accreditation as appropriate.</p> <p>The operator proposed no monitoring. They will be required to comply with the conditions of the permit to use MCERTS monitoring standards.</p>	✓
Reporting	<p>We have specified reporting in the permit. We have required the reporting of the following:</p> <p>Ambient Air Monitoring</p> <p>Emissions to Air (emission points A1 and A2 as discussed in Key issues section)</p> <p>Noise Monitoring (to be agreed under a revised noise management plan).</p> <p>We made these decisions in accordance with the sector Guidance Note S5.06, and is consistent with the metal shredding sector permit template.</p>	✓
<b>Operator Competence</b>		
Environment	There is no known reason to consider that the operator	✓

Aspect considered	Justification / Detail	Criteria met
		Yes
Management System	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 Operator Competence.	
Technical competence	Technical competency is required for activities permitted. The operator is a member of an agreed scheme.	✓
Relevant Convictions	The National Enforcement Database has been checked to ensure that all relevant convictions have been declared. No relevant convictions were found. The operator satisfies our guidance 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 our guidance on Operator Competence.	✓



## Annex 2 – Web publicising responses

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

Response received from
No responses received.
Brief summary of issues raised
-
Summary of actions taken or show how this has been covered
-