Permitting decisions

Variation

We have decided to grant the variation for Courtauld Road Waste Treatment Facility operated by Urbaser Environmental Limited.

The variation number is EPR/AP3138CM/V003.

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 provides a record of the decision making process. It summarises the decision making process in the decision checklist to show how all relevant factors have been taken into account.

This decision document provides a record of the decision making process. It:

- highlights key issues in the determination
- summarises the decision making process in the decision checklist to show how all relevant factors have been taken into account
- shows how we have considered the consultation responses

Unless the decision document specifies otherwise we have accepted the applicant's proposals.

Read the permitting decisions in conjunction with the environmental permit and the variation notice. The introductory note summarises what the variation covers.

Description of the changes introduced by the Variation

The Courtauld Road Waste Treatment Facility, operated by Urbaser Environmental Limited, is a mechanical and biological treatment plant (MBT) for the treatment of non-hazardous, residual municipal and commercial and industrial solid waste including bulky waste, street sweepings and waste from household waste recycling centres. The MBT facility is permitted to accept up to 420,000 tonnes of waste per year.

This variation authorises the addition of a new process on site, this is the production of Quick Solid Recovered Fuel (QSRF). This process will be undertaken as a listed activity under the Environmental Permitting Regulations (EPR) as:

Section 5.4 A (1) (a) (ii) – disposal of non-hazardous waste with a capacity exceeding 50 tonnes per day (or 100 tonnes per day if the only waste treatment activity is anaerobic digestion) involving physico-chemical treatment, and excluding activities covered by Council Directive 91/271/EEC concerning urban waste water treatment.

As a result of this variation, the facility will now comprise of the following 4 processes:

Pre-Processing

Pre-processing allows for the recovery of recyclable material (such as metals, plastics, paper and card) from the residual waste stream with the fine organic fraction being passed through to the biostabilisation phase and certain wastes with low biodegradable content transferred to the QSRF line.

Biostabilisation

The biostabilisation process is for the treatment of waste under aerobic conditions. Each of the three biostabilisation halls has its own piling system. An automatic bucket wheel is fitted in each hall, to perform periodic turning cycles on the piles. The biostabilisation process lasts for six to seven weeks and the process controls air circulation and moisture levels to ensure aerobic conditions are maintained.

Refining

After six to seven weeks, the treated waste will be either a stabilised output material (SOM) for disposal to landfill or a solid recovered fuel (SRF) for combustion off site. The waste is then subject to a refining process which involves the screening of the outputs into different sized materials dependant on the end use.

Production of quick solid recovered fuel (QSRF)

After recyclable material recovery, which takes place during the pre-processing stage, certain waste streams with low biodegradable content will be transferred via conveyor to be shredded within the waste reception area and subsequently bulked for transfer off – site as QSRF. The QSRF will be capable of meeting the non-hazardous landfill waste acceptance criteria.

Changes between the bespoke and consolidated permit template

Bespoke permit	Current Variation
Condition 3.5: Bioaerosols – N/A	Condition 3.5: Bioaerosols - introduced
Table S3.4: Ambient monitoring	Table S3.5 on current variation
Table S3.5: process monitoring	Table S3.4 on current variation
N/A	Table S2.3 introduced
N/A	Table S3.6 introduced

The above table briefly outlines the changes or major differences between the original permit and this variation.

Condition 3.5 for bioaerosols management, which was not on the bespoke permit has been added to the variation notice. The condition is required where an operator's risk assessment identifies that monitoring is required. At the time of permitting the bespoke permit, this condition was not part of the template and as such was not part of the permit. The qualitative risk assessment submitted in support of the bespoke permit did identify monitoring as a requirement as the operator had no site specific data to work with at that time. For this variation, the operator has agreed to transition to a consolidated permit with modern conditions. In updating the permit to modern conditions, this condition 3.5, which is relevant to the operations on site has now been added.

Table S2.3 – Waste codes for the production of quick solid recovered fuel (QSRF), has been inserted as a result of this variation to show waste codes that go through the QSRF process.

Table S3.4, which is for ambient monitoring on the bespoke permit is now table S3.5 in the consolidated variation notice while table S3.5, which was for process monitoring in the bespoke permit is now table S3.4 in the consolidated permit.

Table S3.6 for point and area sources monitoring requirements has been added to the consolidated permit to include the operator's bioaerosols discharge through a biofilter stack.

Key issues of the decision

In reaching our decision to approve this variation, the following key issues have been considered:

Odour Management Plan (OMP)

As part of the original application (EPR/AP3138CM/A001), the operator submitted an odour management plan, which was not fully approved. This was largely due to the early stage of development of the facility which meant that the operator was unable to provide information on key operational parameters such as a detailed odour inventory, operating and maintenance plans, and limits on the key parameters against which operational performance was to be monitored. In partly accepting the submitted OMP, we considered that these aforementioned parameters would only be available once the facility's detailed technical design was specified and the site's operational procedures developed.

The outstanding information for the OMP was requested through a pre-operational condition (PO6) prior to commissioning of the installation to address the issues identified.

In reaching our decision to authorise this variation (EPR/AP3138CM/V003), we have considered that the variation does not increase the odour risk at the site for the following reasons:

- The waste types have not changed.
- The variation does not involve an increase in the quantity of waste permitted, neither does it require increased storage time pre and post processing.
- The processing buildings are fully enclosed and maintained under negative pressure with air routes through an acid scrubber to remove ammonia and a biofilter designed to biodegrade odorous and other volatile organic compounds.

Based on the above, we consider that the existing OMP is satisfactory and does not require a revision as a result of the changes introduced in this variation. However, we have advised the site officer through a handover note that the operator should update the OMP to include the new activity, which is the production of QSRF.

Fire Prevention Plan

The measures set out in the Fire prevention plans: environmental permits guidance (November 2016) (the guidance on gov.uk) have been designed to meet the following three objectives:

- minimise the likelihood of a fire happening;
- aim for a fire to be extinguished within 4 hours; and
- minimise the spread of fire within the site and to neighbouring sites.

We consider, that if an operator submits a fire prevention plan (FPP) that includes the measures set out in the guidance, we are likely to approve that FPP.

We identified the potential risk of fire from the installation due to the treatment and storage of combustible non-hazardous wastes on site (green waste and compost). We have assessed the operator's FPP and are satisfied that the appropriate measures are in place for non-waste materials, managing common causes of fire, preventing self-combustion, managing waste piles, preventing fire spread, detecting and suppressing fires, and contingency planning during and after an incident. We consider these measures to be in line with the guidance.

The operator's fire walls and bays, and the water supply for firefighting did not meet the requirements of our guidance. For this reason, the operator proposed alternative measures to ensure that the objectives of our guidance are met.

Fire walls and bays

The fire walls on site are 60-minute rated as opposed to the recommended 120 minutes by our guidance. The operator posited that the site had been designed and fully built before the requirements of the FPP guidance were published therefore, instead of replacing these firewalls, the operator has additional measures in place to support these 60-minute rated fire walls for all areas of combustible waste storage.

a) Waste Reception Area - The waste reception bunkers which are surrounded by the available firewalls are fitted with optical and beam smoke detectors to identify any smoke or flames being generated by the wastes. These bunkers are fitted with sprinklers to help control any fires within the bunkers. The facility also has heat and smoke detection systems within the waste reception area, with fitted alarm systems triggered upon sensing smoke from a fire. Each residual waste bunker is fitted with two water cannons which will be used to control small fires within the main bunkers. Furthermore, the bulky waste bunker is fitted with a single water cannon which will also be used to control small fires within this bunker. All fire detection and suppression systems on site are in accordance with BS9999.

b) Recyclable Bale Storage Area - The two bale storage areas are adjacent to one another and both sit along the northern wall of the pre-processing area. This recyclable bale storage area is not surrounded by a firewall, but the pre-processing area is enclosed with firewalls. Separation distances for the piles of bales are presented in Appendix A – Updated Fire Prevention Plan, section 10. The piles are separated from each other by concrete walls of modular A - frame construction. These walls are approximately 1200 mm thick at the base and 150 mm at the top. The recyclable bale storage area A-block walls have a minimum freeboard of approximately 0.5 m above the maximum height of the bales which will assist in stopping the spread of fire above the bales. The piles are separated from the available firewalls by Alfablocs (A – frame concrete) and a separation distance (of more than 23 m for the smaller area and of more than 0.75 m for the larger area). Whilst the Alfablocs are not certified firewalls, they will provide additional fire protection to this area (expected > 60 minutes) and the physical isolation of these stockpiles of combustible materials from both themselves and the main structure of the building. To prevent overheating and self-ignition within the recyclable bale storage area, baled recyclables are stored on site for no more than three months. Furthermore, up to 4 fresh bales are collected each week for quality analysis, and the temperature of the bales is recorded as part of this process.

c) The QSRF and SRF storage area - are partitioned from the waste processing areas by firewalls. The bays walls separating the QSRF and the SRF are constructed of reinforced concrete and are of a thickness of 0.5 m as set out in section 3.5.1.1 of the operator's revised FPP. Whilst these walls are not designated firewalls, the operator has confirmed that they will remain intact if there was a fire within this area and that they will help to stop the spread of fire from one bay to another and assist in isolating a fire in this area (by moving material from unaffected bays). As set out in section 3.5.1.2. of the FPP document, the turnaround of material in the storage bays is quick as empty bays are constantly needed to allow the continued discharging of material from the bio-stabilisation halls (six days each week) which is done in batches. These batches are required to be kept separate contractually and as such bays are completely emptied prior to being re-filled. Furthermore, the Refining Area is covered by a sprinkler system which would help to control a fire, if there was a fire within the SRF and QSRF storage area.

Water supplies

In accordance with our guidance, operators will need a water supply of at least 2,000 litres a minute for a minimum of 3 hours for a 300 cubic metre pile of combustible material.

The largest single waste pile at the Courtauld Road Waste Treatment Facility is the North Bunker and the Bulky Waste Bunker, which have a capacity of 5000 m^3. Applying the recommendation of our guidance, this would mean that this facility should have 6000 m^3 of water available for the large pile. According to the operator's FPP, the total volume of water available for firefighting on site is 3,538.5 m^3 which means that

they do not meet our requirements. The operator has acknowledged this shortfall and presented measures employed on site to ensure that the available water supply would always be sufficient. The measures and techniques proposed by the operator involve the optimum use of their fire detection and suppression systems, and the structure of the bunkers, which are constructed of concrete.

As detailed in the Fire Prevention Plan submitted in response to our information notice, the fire detection and suppression measures within the waste reception bunkers are as follows:

- cameras;
- water cannons;
- optical and beam smoke detectors; and
- sprinklers.

a) Auto detection and suppression systems - The cameras and the water cannons have been installed to provide the primary controls to mitigate the spread of a fire within the waste bunker. The cameras allow the crane operators to monitor and control the waste pile within the waste bunkers. The cameras will be monitored on screens within the main Control Room (which is manned 24/7) and the two crane control cabins. This will enable a small localised fire within the bunker to be identified before it is able to spread throughout the bunker. In the event that a small localised fire is identified within the bunker, the water cannons will be deployed.

   The cannons are operated from the crane control cabin to extinguish a localised fire. The cannons are designed to deliver a large volume of water in a very short period of time – the two cannons can deliver up to 1000 litres of water per nozzle per minute at a pressure of 5 bar and will provide coverage of the full extent of the waste bunker area. When tested, the fire cannons soaked waste across the pit within minutes as all of the water was contained within the concrete walled pits and completely surrounded the waste. According to the operator, the very high flow rate of the cannons and walled bunker design will enable a small localised fire to be drenched to extinguish it in a very short period of time and to prevent the spread of the fire throughout the bunker.

   Following operation of the water cannons, and if it is safe do so, the waste cranes will be used to remove the localised area of waste from the bunker and transfer it to the waste quarantine area within the Waste Reception Area. This smaller volume of waste will then be able to be managed locally as a much smaller pile than the working content of the waste bunker.

   In addition, from the crane control cabins, the crane operators can see the full load of every tipped vehicle as the tipping apron is open. Therefore, using the grab, they could remove any deliveries of smouldering waste immediately to the quarantine area to prevent the spread of fire within the bunker. Optical smoke detectors are installed above the bunker and tipping apron. In the event of smoke within the bunker and/or tipping hall, these systems will trigger the fire alarm and sprinkler system. The sprinklers will act as a secondary measure to slow down the spread of a fire within the waste reception area to enable the safe exit of all site operatives and will assist in extinguishing a fire in waste bunkers.

b) Fire containment - The bunker walls are constructed of concrete. This will assist in the containment of fire within the individual bunkers and prevent the spread of a fire to the other bunkers and other waste processing areas within the facility, whilst the fire is locally contained with the fire suppressions systems. The waste bunkers are separated from the rest of the waste processing activities by separate 60-minute fire-walls to the pre-processing area and the bio-stabilisation halls. Therefore, in the event of a fire within the bunker, this will reduce the rate at which a fire would spread throughout the Facility.

The operator has satisfied the requirements of our guidance for appropriate automated detection systems and suppression systems. The FPP has identified common causes of fire in line with our guidance and provided appropriate measures to reduce the associated risks. The ‘first in first out’ principle is utilized on site for proper stock rotation and the operator has demonstrated how this principle works for the facility. There is a large and a small quarantine area on site with additional areas that could be used, if necessary, in

the event of a fire. While the available water supply is not in accordance with our guidance, we agree that the measures proposed by the operator to compensate for this shortfall will be sufficient on site.

We consider that these methods and the proposed alternatives meet the objectives of the FPP guidance and are considered to be appropriate measures.

Pre-operational conditions

All pre-operational conditions in the original permit have been completed by the operator. As a result of this, we have removed table S1.4 and the associated condition 2.5 from the variation notice.

Improvement programme requirements

The bespoke permit had improvement conditions 1 to 3 (IC1 – IC3) which were dependent on the completion of the Courtauld Road Waste Management Plant commissioning phase at the end of 2015. These improvement conditions as specified in the variation notice have not been completed.

The site started accepting waste on 26/11/2014 so should have completed commissioning by the end of 2015. At this time commissioning has not been completed and we are advised that it is not imminent.

Considering the above and the relevance of these improvement conditions, which are key issues in a Mechanical Biological treatment Plant, we have included actual completion dates in table S1.3 in the variation notice.

Bioaerosols Monitoring

The new M9 technical guidance note for environmental monitoring of bioaerosols at regulated facilities has been published to provide a standardised approach for monitoring bioaerosols. It is applicable to facilities that have both ambient and point source emissions. It has been developed to replace the 2009 standardised protocol for monitoring ambient bioaerosols at open compost facilities, which we developed with the Association for Organics Recycling (now known as the Organics Recycling Group).

As the number of enclosed biowaste facilities with point source emissions from stacks or biofilters has increased from 2009, the new M9 provides information on the monitoring of bioaerosols from stacks, open biofilters and in ambient air; its focus being on the following bioaerosols components:

- Aspergillus Fumigatus
- Total mesophilic bacteria

Unlike the previous standardised protocol guidance, sampling and monitoring of gram negative bacteria is not a component of the M9 technical guidance.

For the Urbaser Bespoke Permit, the applicant submitted a qualitative risk assessment for emissions of bioaerosols from the proposed facility, based on available information regarding the facility design, operational management and mitigation methods, the location of sensitive receptors and local meteorological data.

In the bespoke permit, we required the operator, under table S3.1, to carry out quarterly monitoring for bioaerosols at the biofilter stack A1, reducing after the first year of operation with our agreement. In addition, we set improvement condition (IC2) as stated above, for the applicant to assess both sets of monitoring from the first year of operation and use this to validate the qualitative site specific bioaerosols risk assessment (SSBRA) submitted with the application. We agreed that further quantitative assessment may be required if the SSBRA is not demonstrated to be valid, in which case, bioaerosols emission limits can then be set in the relevant bioaerosols tables, if necessary.

Table 3.5: bioaerosols monitoring requirements – ambient monitoring

The applicant's qualitative assessment states that sensitive receptors have been identified within 250 metres of the Installation boundary and winds could transport bioaerosols towards the closest receptors within Hovefields Park traveller's site, 30% of the time.

For this variation, we have added condition 3.5 for the management of bioaerosols at the facility as we have monitoring of bioaerosols as a requirement in the permit. In line with this condition, we have also retained table S3.5 on the permit for ambient monitoring (S3.4 on bespoke permit) with threshold limits of 1000 and 500 for total bacteria and Aspergillus fumigatus respectively in accordance with the new M9 standards.

Table 3.6: bioaerosols monitoring requirements – point and area sources.

Table S3.6 is required when activities are in the open and within 250 metres of a sensitive receptor or where an area or point source (biofilters – open bed or stack) could impact sensitive receptors beyond 250 metres and the applicant has provided us with a suitable quantitative Site Specific Bioaerosols Risk Assessment (SSBRA) in support of their application.

While the operation at the site is enclosed, this has been added because there is a chance that bioaerosols emissions from the biofilter stack could impact sensitive receptors closest to the site. As there was no generally acceptable method of carrying out a quantitative site specific bioaerosols risk assessment, the operator did not provide one for the bespoke permit, but its provision is still very much a possibility. This would be required of the operator if the results of the monitoring required in IC2 does not validate the qualitative risk assessment submitted as part of the bespoke permit. We have not set any limit in table S3.6 as this is dependent on the completion of improvement condition 2.

Additionally, table S3.1, has been amended to reflect the removal of total bacteria and Aspergillus fumigatus as point source parameters from the biofilter stack. This is because the M9 has made provisions for emissions of those two parameters from facilities that have a biofilter stack. This is reflected in table S3.6.

Gram negative bacteria

We have also removed gram negative bacteria from tables S3.5 and S3.6, in order to conform to monitoring standards set by the new M9 technical guidance. While the operator is yet to fully discharge IC2, the operator in part fulfilment of the IC, had started monitoring of Aspergillus fumigatus, total bacteria and gram negative bacteria.

Emissions and Monitoring

In tables S3.1, S3.5 and S3.6, all references to the previously used standard protocol for monitoring bioaerosols at regulated facilities have been removed and replaced with current requirements of the M9 technical guidance. This includes the VDI 4247 Blatt Part 2 requirement, which was used for reference period guidance, in the bespoke permit, under table S3.1. This VDI 4257 guidance, part 2, describes the planning, the procedure and the different methods for emission measurements of microbial air pollutants and identifies requirements for active sampling of bioaerosols from exhaust air flowing through a defined cross section.

Decision checklist

Aspect considered	Decision
Receipt of application	
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.
Consultation/Engagement	
Consultation	The consultation requirements were identified in accordance with the Environmental Permitting Regulations and our public participation statement. The application was publicised on the GOV.UK website. The comments and our responses are summarised in the consultation section.
The facility	
The regulated facility	We considered the extent and nature of the facility at the site in accordance with RGN2 'Understanding the meaning of regulated facility', Appendix 2 of RGN 2 'Defining the scope of the installation. The activities are defined in table S1.1 of the permit.
The site	
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. We consider that the application will not affect any sites of nature conservation, landscape and heritage, and/or protected species or habitats identified and to that effect, we sent an Appendix 11 to Natural England for information only. Internally, we consulted the fisheries and biodiversity team (FBG) and they responded that they had no significant concerns about this variation.
Environmental risk assessment	
Environmental risk	We have reviewed the operator's assessment of the environmental risk from the facility. The operator's risk assessment for fugitive emissions is satisfactory.
Operating techniques	
General operating techniques	We have reviewed the techniques used by the operator and compared these with our additional technical guidance for: Mechanical biological treatment sector and we consider them to represent appropriate techniques for the facility. The operating techniques that the applicant must use are specified in table S1.2 in the environmental permit.
Fire prevention plan	We have assessed the fire prevention plan and are satisfied that it meets the measures and objectives set out in the Fire Prevention Plan guidance. See key issues section

Aspect considered	Decision
Permit conditions	
Updating permit conditions during consolidation	We have updated permit conditions to those in the current generic permit template as part of permit consolidation. The conditions will provide the same level of protection as those in the previous permits.
Use of conditions other than those from the template	Based on the information in the application, we consider that we do not need to impose conditions other than those in our permit template.
Waste types	We have specified the permitted waste types, descriptions and quantities, which can be accepted at the regulated facility. We are satisfied that the operator can accept these wastes for the following reasons: • they are suitable for the proposed activities • the proposed infrastructure is appropriate; and • the environmental risk assessment is acceptable. We made these decisions with respect to waste types in accordance with our Technical Guidance Note WM3 – *Waste Classification*.
Pre-operational conditions	The pre-operational measures in the bespoke permit have all been completed and consequently removed from the variation notice.
Improvement programme	Based on the information on the application, we consider that we do not need to impose any new improvement programme requirements. However, for the existing improvement programmes from the bespoke permit, we have changed the expected completion dates. See key issues section.
Emission limits	We have deleted the gram negative bacteria emission limits. See key issues section.
Monitoring	We have not added any new monitoring requirement as a result of this variation. However, we have updated the relevant monitoring tables in accordance with the new M9 technical guidance note for measurement of bioaerosols at regulated facilities. The above will cover both total bacteria and Aspergillus fumigatus. We have deleted the requirement for monitoring of gram negative bacteria in accordance with the new guidance. Based on the information in the application we are fully satisfied that the operator's techniques, personnel and equipment have either MCERTS certification or MCERTS accreditation as appropriate.
Reporting	We have not deleted reporting of monitoring data as a result of this variation. The operator is still required to report monitoring data for bioaerosols – both ambient and point sources, emissions to air (odour) from table S3.1 and process monitoring data from table S3.4. We have included the reporting of water usage, energy usage and raw material usage as required by the Industrial Emissions Directive (IED). This was omitted in the original permit.

Aspect considered	Decision
Operator competence	
Management system	There is no known reason to consider that the operator will not have the management system to enable it to comply with the permit conditions.
Financial competence	There is no known reason to consider that the operator will not be financially able to comply with the permit conditions.
Growth Duty	
Section 108 Deregulation Act 2015 – Growth duty	We have considered our duty to have regard to the desirability of promoting economic growth set out in section 108(1) of the Deregulation Act 2015 and the guidance issued under section 110 of that Act in deciding whether to grant this permit. Paragraph 1.3 of the guidance says: "The primary role of regulators, in delivering regulation, is to achieve the regulatory outcomes for which they are responsible. For a number of regulators, these regulatory outcomes include an explicit reference to development or growth. The growth duty establishes economic growth as a factor that all specified regulators should have regard to, alongside the delivery of the protections set out in the relevant legislation." We have addressed the legislative requirements and environmental standards to be set for this operation in the body of the decision document above. The guidance is clear at paragraph 1.5 that the growth duty does not legitimise non-compliance and its purpose is not to achieve or pursue economic growth at the expense of necessary protections. We consider the requirements and standards we have set in this permit are reasonable and necessary to avoid a risk of an unacceptable level of pollution. This also promotes growth amongst legitimate operators because the standards applied to the operator are consistent across businesses in this sector and have been set to achieve the required legislative standards.

Consultation

The following summarises the responses to consultation with other organisations, our notice on GOV.UK for the public and the way in which we have considered these in the determination process.

Responses from organisations listed in the consultation section

Response received from
Essex County Council
Brief summary of issues raised
1. Potential for significantly increased vehicle movements and associated noise We have carried out an analysis of the intermediate site weighbridge records and identify an additional 1,035 vehicle loads generated during May to July 2017 as a direct result of the Quick SRF changes. Assuming a six-day working week (79 working days over the 3 month period), this equates to an average of approximately 26 additional movements per working day. These additional vehicle movements are associated with the movement of the Quick SRF from the Waste Reception Hall to the Treatment Output loading area which involves driving 44 tonne articulated bulkers outdoors, along the internal site roads in close proximity to residents to the East of the site. The vehicles must reverse into the loading area which causes their white noise reversing alarms to sound and the roller shutter doors to open and close more frequently than would have been the case without the Quick SRF changes in place. These additional movements occur whenever the facility is processing waste i.e. typically between the hours of 7am and 11pm. The vehicle movements were not considered within the original environmental permit application. *2. Increases in noise complaints* There have also been a number of recent noise complaints recorded by the operator at the facility. We are not in a position to ascertain whether they are solely related to the Quick SRF vehicle movements, but we believe they are a relevant consideration for the Environment Agency.
Summary of actions taken or show how this has been covered
Improvement Condition 3 on the variation notice requires the operator to carry out a Noise Impact Assessment in accordance with the requirements of BS4142: 1997 – Method for Rating Industrial Noise affecting mixed Residential and Industrial Areas. This requires not only an assessment of the impact of noise on nearest sensitive receptors but also a timetable for implementation of any improvements identified to reduce noise to an acceptable level.

Response received from
Public Health England (PHE)
Brief summary of issues raised
We recommend that any Environmental Permit issued for this site should contain conditions to ensure that the following potential emissions do not impact upon public health: particulate matter and odour from waste handling and storage.

Based solely on the information contained in the application provided, 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. In relation to potential risk to public health, we recommend that the Environment Agency also consult the following relevant organisation(s) in relation to their areas of expertise: • the local authority for matters relating to impact upon human health of contaminated land; noise, odour, dust and other nuisance emissions; • the Director of Public Health for matters relating to wider public health impacts.
Summary of actions taken or show how this has been covered
This variation for the quick Solid Recovered Fuel (QSRF) does not increase the odour risk on site and all waste storage and treatment activities are within an enclosed system maintained under negative pressure. The extracted air will be treated by acid scrubbers and a biofilter, which will minimise the level of particulate emitted. The Director of Public Health and the Local Authority have also been consulted as part of this determination.

Response received from
Local Authority - Environmental Health Department of Basildon Borough Council
Brief summary of issues raised
Please be advised that Environmental Health Services, on behalf of Basildon Borough Council, having considered the information provided have no comments about the proposed change(s) in this process.
Summary of actions taken or show how this has been covered
N/A

Response received from
Essex County Fire and Rescue Service
Brief summary of issues raised
As we have attended several incidents at these premises, a full fire safety audit is due to be scheduled in the near future, to ensure that all fire precautionary measures are in place and the high level of fire safety management, as previously agreed, is being maintained. Therefore, this fire and rescue authority has no objections at this time to the variation of the environmental permit being granted.
Summary of actions taken or show how this has been covered
N/A