

Permitting decisions

Variation

We have decided to grant the variation for West London Composting Limited.

The variation number is EPR/UP3893EC/V007.

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:

- 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 changes introduced by the variation

The operator has applied for a substantial variation to the existing permit to:

- treat municipal solid waste (MSW) fines and other biodegradable wastes in a sanitisation and stabilisation process using in-vessel composting (IVC) vessels to produce a waste compost-like output (CLO) which will be dispatched off-site for recovery.
- treat biodegradable materials which are not subject to Animal By-Products (ABP) Regulations in open windrows located at the northern side of the site to produce a PAS 100 compost product.
- relocate the waste transfer activity which is operated in the reception building to another separate part of the reception building, thus allowing the reception building to be split into 3 separated areas so that incoming untreated MSW fines and other wastes do not come into contact with either the waste located in the waste transfer station or the sanitised and stabilised waste CLO.

The following operations are currently undertaken on site:

- Processing of biodegradable materials, which include wastes subject to the ABP Regulations, into a PAS 100 compost product. The materials are shredded and mixed prior to transfer to the sanitisation and stabilisation stages of the composting process, which is undertaken in IVC vessels located on the southern side of the site. The final maturation phase is undertaken in the open, on a maturation pad located on the northern side of the site.
- Operation of a waste transfer station activity in designated bays at the back of the reception building, accepting food waste collections for temporary storage prior to removal for onward processing at a third party site.

As a result of this variation, the site will now operate as follows:

The site comprises of two separate areas:

- an area to the south of the facility where the IVC (sanitisation and stabilisation) takes place in the IVC vessels and a small waste transfer station operation is undertaken in the central area of the reception building; and
- a large concrete pad to the north designated for open-windrow composting.

The Installation will continue to be operated under the current activities (Table S1.1A) within the land shown on the site plan at schedule 7A until the pre-operational conditions in Table S1.4 have been completed and approved by the Environment Agency. On approval, the Installation will be operated under the proposed activities (Table S1.1B) within the land shown on the site plan at schedule 7B.

This variation authorises the following:

- a) In-vessel composting, on the southern side of the site, of municipal solid waste (MSW) fines which will be blended with source segregated kerbside, civic amenity and commercial food and green wastes to balance the carbon to nitrogen ratio for optimal conditions in the reception area of the reception building and then moved into the vessels for sanitisation and subsequent stabilisation. After stabilisation, the treated waste CLO will be moved into the separated dispatch area of the reception building pending removal from site to an appropriately licenced facility which can take the waste CLO for use in landfill restoration. The MSW fines which will be accepted onto the site will be sourced from a materials recovery facility (MRF). Annual throughput from this process shall not exceed 50,000 tonnes.
- b) Operation of a waste transfer station in a relocated and separated central section of the reception building located on the southern section of the site. The waste transfer activity will accept food waste, green waste and commingled food and green waste for transfer only, with waste being both off-loaded and re-loaded within the central separated area of the reception building. The throughput of the waste transfer station remains unchanged at 20,000 tonnes.

- c) Open windrows composting, on the northern side of the site, of biodegradable wastes to produce a PAS 100 QP certified compost. Materials to be processed through this treatment process shall not include catering and animal wastes listed in the Animal By-Products Regulations (ABPR). This operation will take place on the concrete pad north of the installation, with an annual throughput not exceeding 50,000 tonnes. The concrete pad shall no longer accept any output from the in-vessel composting process.
- d) Increase in the total site annual throughput from 95,000 tonnes to 120,000 tonnes.

The acceptance and pre-treatment of municipal solid waste fines will be enclosed and maintained under negative pressure in a building with a ventilation extraction system.

All wastes on site will be stored and treated on an impermeable surface with sealed drainage system.

Odorous emissions from the MSW fines reception area, transfer building, fines storage building and the IVC tunnels will be channelled through an abatement system comprising a wet scrubber and two biofilter units for treatment prior to release to atmosphere.

Leachate from the IVC system is collected in a network of tanks that provide a total storage capacity of 576 m³. Leachate generated will only be recirculated within the IVC treatment process. Upon the leachate storage tanks reaching 90% capacity, a specialist contractor will be notified, and the tanks will be emptied within 48 hours.

Leachate from the open windrow composting process will be collected by a dedicated sump and channelled to two leachate tanks, situated to the north of the maturation pad, and with a combined storage capacity of 980 m³. Leachate from the open windrow composting process will not be recirculated. Upon the leachate tanks reaching 80% capacity, a specialist contractor will be notified, and the tanks will be emptied within 48 hours.

The bioaerosols monitoring frequency given in Table S3.4 may be reduced to twice a year if agreed to in writing by the Environment Agency.

Key issues of the decision

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

- Bioaerosols monitoring
- Fire Prevention Plan (FPP)
- Noise Impact Assessment (NIA)
- Odour Management Plan (OMP)
- Pre-operational conditions
- Improvement programme requirements
- Assessment of the municipal solid waste fines
- Confidential information

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. The M9 monitoring guidance replaces 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).

The M9 monitoring guidance specifies monitoring requirements for the following parameters:

- *Aspergillus fumigatus*
- Total mesophilic bacteria

In accordance with the M9 guidance, sampling and monitoring of gram-negative bacteria is no longer required.

For this variation, we have removed gram negative bacteria from table S3.4 in order to conform to ambient monitoring standards specified in the new M9 guidance. The operator is now only required to monitor for Total bacteria and *Aspergillus fumigatus* in ambient air. The emission threshold limits for total bacteria and *Aspergillus fumigatus* are retained as part of table S3.4. 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.

We have not set monitoring requirements for the open bed biofilters. This is because any release of bioaerosols from the open bed biofilters will be captured and included in the ambient air sampling. We have taken this approach for all biowaste treatment facilities with open bed biofilters.

Fire Prevention Plan (FPP)

The measures set out in the Fire prevention plan: 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 (food and green waste, green waste material and municipal solid waste fines).

The applicant submitted an FPP in support of this variation application. The applicant has identified common causes of fire in line with our guidance and has provided appropriate measures to reduce the associated risks. The 'first in first out' principle is utilised on site for proper stock rotation and the operator has demonstrated how this principle works at the facility to ensure that wastes are not stored for longer than they should. There is a quarantine area on site with the capacity to hold at least 50% of the volume of the largest waste pile. Separation distances and pile sizes, where applicable, are compliant with the requirements of our guidance and the site has sufficient water supply for firefighting. The FPP also incorporates a plan for the decontamination of the site after a fire.

The FPP has not considered the actively managed phases of sanitisation and stabilisation of the municipal solid waste fines treatment activity and the open windrow composting of waste, which are exempt from the requirements of the FPP guidance. The oversize materials from the open windrow composting process comply with the requirements of our guidance and are constantly being incorporated into the open windrow composting process.

Storage of materials after screening for the open windrow process has also not been considered in the FPP because at this stage, the compost is considered a PAS 100 compliant material which is no longer designated as waste. Wastes stored within the fines and open windrow reception areas of the facility have not been considered because of the quick processing time of 48 hours, which the operator has committed to. Within the 48 hours, the received waste materials are processed and prepared for the sanitisation phase of the process, which is actively managed for temperature and moisture. The 48 hours limit has been applied to these activities in table S1.1 of the variation notice.

The measures put in place by the operator for fire detection and suppression deviate from our guidance, however, we have considered that monitoring during the active phases of both processes using probes is sufficient as any temperature increase will most likely be detected. The trigger temperature of 75°C is acceptable for both processes as thermal runaway of compost begins at 80°C.

Table 1 – trigger temperatures for waste piles in the different waste treatment processes.

Building/ waste type	IVC process	Open windrow composting process	Thermal runaway of compost
Trigger Temperature Degrees °C	75	75	80

Upon reaching this trigger temperature, the operator will either douse the windrow with water via the use of a bowser or spread the affected windrow to allow for cooling. Post treatment storage of the waste compost-like output (CLO) materials will be in bays constructed from blocks which meet the following classification 'Class A1 of the Fire Classification European Standard EN 13501', which means they are totally non-combustible. Waste in the bays will not be stored for longer than 3 months. This limit is also included in table S1.1 of the variation notice.

We have assessed the operator's FPP and are satisfied that the measures in place are appropriate for:

- management of non-waste materials
- managing common causes of fire such as hot works, smoking materials and arson
- preventing self-combustion, managing waste piles and preventing the spread of fire.

A robust contingency plan is in place for dealing with issues during and after an incident and the operator has demonstrated that there are enough resources for active firefighting on site.

We consider these methods of fire prevention to be in line with the requirements of our FPP guidance and they are considered to be appropriate measures. As part of compliance, the Environment Agency can audit

the FPP at any time and should any deficiencies be identified, the operator will be required to provide an updated FPP accordingly.

Noise Impact Assessment (NIA)

The changes that were made in this variation involve the introduction of new noise sources at the Installation. These new sources include extraction fans for the odour abatement units and a new shredder. The applicant submitted a Noise Impact Assessment that covers daytime operations at the facility which is in accordance with the requirements of BS4142: 2014 – Method for Rating Industrial Noise affecting Mixed Residential and Industrial Areas.

The applicant carried out a survey to identify the location of the nearest sensitive receptors which are at risk of being affected by noise emissions from the facility. The operator also carried out noise measurements for the existing plants and activities at the facility. Noise surveys were undertaken to determine the existing background noise levels at the nearest sensitive receptors in the absence of the new noise sources. In addition to the existing sources of noise at the facility, a prediction and assessment of the noise impact from the proposed new plant was carried out at the nearest residential properties and presented in the associated report that was submitted in support of the application.

The report shows that at the closest noise sensitive receptors considered in the assessment, the noise level from all noise sources at the facility is considered to be below the background sound levels. However, this is based on an assumption that the operator will provide a noise barrier that will provide an 11dB attenuation for emitted noise from the new shredder.

We conducted an audit on the submitted noise impact assessment and have agreed with the operator's assumptions and conclusion. However, we have included pre-operational condition 4 in the permit which requires the operator to install an acoustic barrier that will provide an 11dB attenuation around the new shredder prior to the commencement of the processing of municipal solid waste fines and the open windrow operations. This is in accordance with BS 4142, which states that *"where the rating level does not exceed the background sound level, this is an indication of the specific sound source having a low impact, depending on the context"*.

Odour Management Plan (OMP)

The operator submitted several OMPs in support of this variation application. We have reviewed all versions and have only partly approved Issue 9 - WLC07 Odour Management Plan, dated 12/04/2019 and received 25/04/2019.

The partly approved OMP contains a list of odour sensitive receptors within 250 metres of the Installation boundary. The OMP contains a detailed categorisation of the various waste types expected at the facility. This categorisation is based on the sources of the waste materials, with an evaluation of the typical and abnormal compositions of wastes from these sources. The applicant has used the likelihood of receipt of waste with abnormal compositions to assess the odour potential of each waste type. An analysis of how waste from the various sources could be affected by seasonal variation was carried out by the applicant and the odour implication of this variation has been detailed within the OMP along with management controls in place for any resultant odorous emissions.

The OMP details the various processes involved in the waste recovery operations from waste acceptance through to post-storage operations. At each stage of the process, there are monitoring parameters, critical limits and process controls that contribute to the mitigation of odour emissions.

The operator will carry out daily olfactory monitoring at six points around the perimeter of the site. The site's odour level is based on an intensity scale of 1 to 6, with 6 being extremely strong odour, 3 being distinct odour which is easily detectable while walking and 1 being very faint odour. Extensive monitoring by the operator beyond the Installation boundary will be triggered when the odour level is above the intensity rating of 3. Procedures for any corrective and preventive actions for such occurrences are detailed in the OMP.

The operator's OMP has also detailed contingency measures in place to bring any odour problems under control when normal measures prove inadequate. These contingency measures are in place for scenarios, where trigger values or critical limits have been exceeded.

In addition to the management controls in place for odour, the operator has proposed an odour abatement system comprising a new wet scrubber and 2 biofilter units (1 new and 1 existing). Odorous emissions from the fines reception and transfer building, storage building and in-vessel composting vessels are channelled first to the wet scrubber and then to the two biofilter units for treatment before release to atmosphere.

In emergency situations such as equipment failure, staff absence and flooding, operations that may lead to increased odour release will be temporarily stopped. Consideration will also be given to the suspension of receipt of potentially odorous substances and/ or removal of such substances from the site.

In partly approving Issue 9 of the Odour Management Plan, we consider that the control measures contained in the OMP are suitable for the nature and complexity of the facility. We have considered that the process controls and proposed abatement should be sufficient to minimise the potential for odour emissions from this facility. The submitted OMP is also in accordance with our H4 Odour Management Guidance. However, the operator has to demonstrate that the proposed system for odour abatement will be effective for abatement of odorous emissions. Consequently, we have set pre-operational conditions and improvement programme requirements in relation to odour abatement at the facility. Upon completion of these conditions, an updated OMP shall be submitted to the Environment Agency for consideration and full approval.

Pre-operational conditions (proposed activities)

Pre-operational condition 1 (PO1)

This pre-operational condition requires the operator to submit a report on the proposed odour abatement to the Environment Agency, prior to acceptance and processing of municipal solid waste fines at the facility. This pre-operational condition stipulates that the odour abatement report shall comprise a detailed description of each odour abatement system, the operational design parameters, the monitoring of process parameters and a demonstration of how the system will effectively abate odorous emissions from the composting vessels, the municipal solid waste reception area, waste transfer area and municipal solid waste fines storage area.

The operator is required to carry out further investigation and submit to the Environment Agency for written approval, a proposal for additional abatement or change of design or process operational parameters supported by a Best Available Techniques (BAT) assessment and scientific evidence if it is shown that the proposed odour abatement design or parameter will not result in considerable abatement or reduction of the odorous emissions from the treatment process.

Pre-operational condition 2 (PO2)

We have added a pre-operational condition to the notice, which requires the operator to submit a structured commissioning plan to the Environment Agency for approval at least 8 weeks (or any other date as agreed with the Environment Agency) prior to the commencement of the commissioning phase. The commissioning phase allows the operator to install, operate and test the wet scrubber, the new biofilters and associated components to ensure that all operating conditions are consistently achievable and in line with the proposed design and that emissions of ammonia, hydrogen sulphide and VOCs are reduced to levels that are below their critical limits. The commissioning operations need to be carried out in accordance with a commissioning plan as approved by the Environment Agency. We have specified that municipal solid waste fines shall not be accepted at the Installation unless the Environment Agency has given prior written permission under this condition.

Pre-operational condition 3 (PO3)

As a result of this variation, the leachate lagoon at the northern side of the facility, which will now be used for open windrow composting, will no longer be operational. This will be replaced by two new leachate tanks and a fresh water tank located within a concrete bund. To ensure that the new secondary containment is fit

for purpose, we have added pre-operational condition PO3, which requires the operator to carry out a review of the design, method of construction and integrity of the proposed north site secondary containment. The review must be carried out by a qualified civil or structural engineer at least 8 weeks (or any other date as agreed with the Environment Agency) prior to the commencement of the open windrow activity. The review must compare the constructed secondary containment against the standards set out in *How to comply with your environmental permit. Additional technical guidance for: composting and aerobic treatment sector (LIT 8705 Report version 1.0)* and CIRIA C736 – Containment Systems for the Prevention of Pollution – secondary, tertiary and other measures for industrial and commercial premises or other relevant industry standard.

A written report of the review shall be submitted to the Environment Agency for approval detailing the review's findings and recommendations including details of any proposed maintenance and inspection regime. Any relevant remedial action shall be implemented to ensure that the secondary containment meets the standards set out in the guidance documents. .

Pre-operational condition 4 (PO4)

In line with the recommendation in the Noise Impact Assessment Report submitted to the Environment Agency on 02/04/2019, we have added this pre-operational condition to ensure that an acoustic barrier is constructed for the new shredder. We have specified that prior to the commencement of municipal solid wastes fines processing and the open windrow composting operations, the operator shall submit a report to the Environment Agency for approval detailing the design specifications and construction details of the recommended acoustic barrier. The report must be written by an experienced and suitably qualified person in accordance with the specified procedures in BS4142:2014 and must also demonstrate that the barrier will adhere to the recommendations specified in the Noise Impact Assessment Report P19-065-R01v3 and our Horizontal Guidance for Noise Part 2 – Noise Assessment and Control, section 3.2.2.2: Sound attenuation by barriers.

The report must also contain information to demonstrate that the constructed barrier is robust to provide the 11dB attenuation predicted in the noise impact assessment report P19-065-R01v3.

Pre-operational condition 5 (PO5)

We have added pre-operational condition 5 to ensure that there is no contamination of wastes which are PAS 100 compliant with non-compliant wastes. The pre-operational condition requires the operator to ensure that the existing areas used for the acceptance, pre-treatment, storage and treatment of wastes (including the IVC vessels) are cleaned down, with all existing waste and non-waste (PAS 100) output removed, prior to the commencement of processing of municipal solid wastes fines. The new activity for the processing of municipal solid wastes fines shall not commence at the facility unless the Environment Agency has given prior written permission.

Improvement programme requirements (current and proposed activities)

Improvement condition 1 (IC1)

We have added an improvement condition which requires the operator to submit a revised Odour Management Plan, 3 months after commissioning of the proposed odour abatement. This is to ensure that the OMP is updated to reflect any operational odour abatement and associated parameters approved during the commissioning phase.

Improvement condition 2 (IC2)

We have retained and modified IC2, which was included when the permit was previously varied to add the waste transfer station operation in 2016. This improvement condition requires the operator to submit revised written procedures for approval to meet all the relevant BAT requirements for Management Systems as detailed in Environment Agency's draft guidance *How to comply with your environmental permit. Additional technical guidance for: composting and aerobic treatment sector (LIT 8705 Report version 1.0)*

and Sector Guidance Note IPPC S5.06 – *Guidance for the Treatment of Hazardous and Non-Hazardous Waste*. We have stipulated that the procedures must cover all activities in table S1.1B AR1 to AR10, and must contain dates for implementation of individual measures.

Improvement condition 3 (IC3)

To validate the effectiveness of the odour abatement after commissioning, we have added improvement condition 3 to the permit. This requires the operator to submit a report on the performance of the approved odour abatement systems for minimisation of odorous emissions. The report must contain the following details:

- A minimum of 2 months of daily odour monitoring results at the site boundary.
- For each odour abatement system, at least three inlet and outlet monitoring results for all odorous compounds shall be taken during full operation using MCERTS methods and in line with M2 monitoring guidance.
- For each odour abatement system, based on inlet and outlet monitoring, calculations of the percentage treatment efficiency for each odorous component of the gas stream shall be provided and compared to the percentage treatment efficiencies stated in application EPR/UP3893EC/V007.
- Process monitoring results including temperature, moisture, conductivity, air flow and pH shall be provided and compared to process monitoring figures stated in application EPR/UP3893EC/V007.

In the event that odour is detected at the site boundary or where inlet and outlet monitoring and/or process monitoring does not indicate effective BAT treatment of odour in line with the efficiency and process monitoring figures stated in application EPR/UP3893EC/V007, then the report must also include any identified improvements or recommendations for improvement. The report must also include timescales for implementation of any identified improvements.

Improvement condition 4 (IC4)

We have added improvement condition 4 to the permit in order to identify all point source emissions to surface water and sewer and clarify the movement of process and non-process liquids on site as a result of this variation. This improvement condition requires the operator to undertake a review of the drainage management systems on site. The outcome of the review must be provided to the Environment Agency in the form of a written report and updated site drainage plans (north and south) showing the location of any surface water drainage, foul sewer drainage and process water drainage at the facility. We have specified that the report must include:

- A detailed description of how drainage is managed at the facility.
- A description of site drainage streams, how these streams are categorised (contaminated and uncontaminated) and justification as to why they have been classified as such.
- The location of all emissions points to land or water and sources of the various streams.
- Details of any interceptors or screens on site and the streams they serve.
- A description of the routing of all the Installation's drains and subsurface pipework including any interconnection and link between the drains and pipework.

We consider this necessary to ensure that when in full operation, all aspects of drainage on site are properly considered and managed.

Assessment of the municipal solid waste fines

To assess the suitability of the municipal solid waste fines (EWC code 19 12 12) for biological treatment through sanitisation and stabilisation, we asked the applicant to undertake a biodegradability assessment using the parameters outlined in the Environment Agency's Framework Guidance Note for assessing the suitability of wastes going to anaerobic digestion, composting and biological treatment (dated July 2013).

For this purpose, the applicant collected samples from the waste producer Renewi PLC, analysed these samples in accredited laboratories and carried out an assessment of the suitability of the fines for biological treatment based on the results of the analysis.

The report concluded that this waste stream is not classified as hazardous. The waste stream has been well characterised with a detailed description of the sources of the waste and processes involved in its production.

The composition of the waste stream has been assessed and data for inhibitory conditions have been presented. Inhibitory values for moisture content and carbon to nitrogen ratio for the aerobic process of composting have been considered and compared to data obtained from the laboratory analysis. The result of the analysis shows that the moisture content and C/N ratio of the fines, are outside the recommended values in the Framework Guidance Note. However, the applicant has presented an operational plan to correct these inhibitory values during the recovery process. The pH of the MSW fines is consistent with recommended values for the composting process.

The laboratory results has also shown that substances within the MSW fines stream are capable of 90% biodegradability after 42 days. This can be shorter if an inoculum such as green waste is introduced into the process. The applicant has proposed a treatment timeframe of 35 days, suggesting that over 35 days, using food and green waste as inoculum, the waste stream is capable of 90% biodegradability as recommended by the Framework Guidance Note. This position is supported by the laboratory analysis.

The inhibitive value for lead from the analysed stream is higher than the recommended value in the PAS 100 guidance but lower than that set in the Separated Organics Materials (SOM) Land Restoration End Use Standard as detailed in the table below.

Table 2 – Laboratory test results for lead compared to relevant standards

Parameter (mg/kg dm) ¹	Laboratory test result	PAS 100 Limit	SOM Limit
Lead	241	200	750
Note 1 – milligrams per kilogram dry matter			

In accepting this assessment, we have considered that the output from this process is to be used for landfill restoration and not on agricultural land. All other relevant parameters and heavy metals are within acceptable limits of the SOMs Land Use Restoration End Use Standard, which provides guidance on the required quality of waste compost-like output (CLO) materials for use in landfill restoration /reclamation.

Prior to the treated fines removal from site, the operator shall take a sample of the stabilised MSW fines at intervals of 5,000 tonnes. The site manager shall send the sample to an accredited laboratory to ensure it meets the applicable requirements of the SOM standard for landfill restoration.

The operator also has a Fines Management Plan in place. The measures outlined in the plan are to ensure that that site does not accept fines when they do not have enough capacity for them to be treated, stored and despatched in accordance with permit conditions and also to ensure that waste CLO produced from the site is used for landfill restoration and not disposed to landfills.

Confidential Information

Supporting documents have been submitted with copyright and confidentiality clauses, with restrictions on disclosure to others and their use. We discussed this with the applicant and in an email dated 21/12/2017, the applicant confirmed that the Environment Agency can upload the permit application documents to the Public Register as they are not confidential.

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 substantial change installations	<p>The consultation requirements were identified in accordance with the Environmental Permitting Regulations and our public participation statement.</p> <p>The application was publicised on the GOV.UK website. We consulted the following organisations:</p> <ul style="list-style-type: none"> • Food Standards Agency • Health and Safety Executive • London Borough of Hillingdon - Director of Public Health • Public Health England • Fire and Rescue Service London • Animal and Plant Health Agency (APHA) • London Borough of Hillingdon Local Authority - Planning • London Borough of Hillingdon Local Authority – Environmental Health <p>The comments and our responses are summarised in the consultation section.</p>
The facility	
The regulated facility	<p>We considered the extent and nature of the facility/facilities at the site in accordance with RGN2 'Understanding the meaning of regulated facility', Appendix 2 of RGN 2 'Defining the scope of the installation', Appendix 1 of RGN 2 'Interpretation of Schedule 1'.</p> <p>The extent of the facility is defined in the site plan and in the permit. The activities are defined in table S1.1 of the permit.</p>
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. The plan is included in the permit.
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>We have assessed the application and its potential to affect all known sites of nature conservation, landscape and heritage and/or protected species or habitats identified in the nature conservation screening report as part of the permitting process.</p> <p>We consider that the application will not affect any sites of nature conservation, landscape and heritage, and/or protected species or habitats identified.</p> <p>We have not consulted Natural England on the application. The decision was taken in accordance with our guidance.</p>

Aspect considered	Decision
Environmental risk assessment	
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. Sector specific issues regarding noise, fire prevention, odour and bioaerosols are addressed in the key issues section.</p>
Operating techniques	
General operating techniques	<p>We have reviewed the techniques used by the operator and compared these with the relevant guidance notes and we consider them to represent appropriate techniques for the facility.</p> <p>The operating techniques that the applicant must use are specified in table S1.2 in the environmental permit.</p>
Odour management	<p>We have reviewed the odour management plan in accordance with our H4 guidance on odour management.</p> <p>See key issues section.</p>
Noise management	<p>We have reviewed the submitted Noise Impact Assessment (NIA) in accordance with our guidance on noise assessment and control.</p> <p>We have added pre-operational condition 4 (PO4) to the permit, to support the submitted NIA. See key issues section.</p>
Fire prevention plan	<p>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.</p> <p>See key issues section.</p>
Permit conditions	
Updating permit conditions during consolidation	<p>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.</p>
Use of conditions other than those from the template	<p>Based on the information in the application, we consider that we do not need to impose conditions other than those in our permit template.</p>
Raw materials	<p>We have not specified limits and controls on the use of raw materials and fuels.</p>
Waste types	<p>We have specified the permitted waste types, descriptions and quantities, which can be accepted at the regulated facility.</p> <p>We are satisfied that the operator can accept these wastes for the following reasons:</p> <ul style="list-style-type: none"> • they are suitable for the proposed activities • the proposed infrastructure is appropriate; and • the environmental risk assessment is acceptable. <p>We made these decisions with respect to waste types in accordance with our Framework Guidance Note (dated July 2013).</p>
Pre-operational conditions	<p>Based on the information in the application, we consider that we need to impose pre-operational conditions.</p> <p>See key issues section.</p>

Aspect considered	Decision
Improvement programme	Based on the information on the application, we consider that we need to impose an improvement programme. See key issues section.
Emission limits	We have deleted the gram negative bacteria emission limit from the bioaerosols monitoring table S3.4. Further information is provided in the key issues section.
Monitoring	We have updated table S3.3 – Process monitoring requirements, to include monitoring for the biofilters and wet scrubber unit on site. Ambient monitoring of bioaerosols (Total Bacteria and Aspergillus fumigatus) shall continue as detailed in table S3.4. Based on the information in the application we are 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 – ambient sources.
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.
Technical competence	Technical competence is required for activities permitted. We are satisfied that the operator is technically competent.
Growth Duty	
Section 108 Deregulation Act 2015 – Growth duty	<p>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.</p> <p>Paragraph 1.3 of the guidance says:</p> <p>“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.”</p> <p>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.</p> <p>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</p>

Aspect considered	Decision
	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
Public Health England - London
Brief summary of issues raised
Public Health England (PHE) London – raised no significant concerns
Summary of actions taken or show how this has been covered
N/A

No responses were received from the other organisations consulted.

This proposal was also publicised on the Environment Agency's website between 09/05/2018 and 07/06/18, but no representations were received during this period.