

Environment Agency permitting decisions

Environment Agency initiated variation

We have decided to issue an Environment Agency initiated variation for Harecrag Water Treatment Plant operated by SUEZ Recycling and Recovery UK Ltd .

The variation number is EPR/TP3031LV/V004

Issued: 03/03/2020

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.

This Environment Agency has a duty, under the Environmental Permitting (England and Wales) Regulations 2016, regulation 34(1), to periodically review permits. As a result of that review we have identified a number of necessary changes we must make to your permit to reflect current legislation and best practice. These changes principally relate to:

- Introduction of an engineering condition. This is to require that any engineering work is completed to a standard agreed with the Environment Agency, to include construction quality assurance. It is introduced for consistency with plant included within landfill permits where these standards already apply; and
- A standard reporting table (schedule 4)

We also aim:

- Consolidate permits - all variations to your permit will be brought together in to one permit so the requirements will be clearer.
- We will implement the Industrial Emissions Directive (IED) and other regulatory changes.
- We will include permit conditions to implement the statutory requirements of the Waste Framework Directive, for example to reflect the requirements of the waste hierarchy.

Site specific issues which result in a change to the current template will also be addressed, for example incorporating completed improvement conditions into the permit and removing inconsistencies.

Other changes may relate to a specific permit or amendments to monitoring requirements or emission limits which have been agreed with the Environment Agency but not incorporated into the permit.

Purpose of this document

This decision document:

- explains how the Environment Agency initiated variation 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.

Structure of this document

Annex 1: decision checklist

This document should be read in conjunction with the agreed Environment Agency variation request form and permit/ notice.

Aspect considered	Justification / Detail	Criteria met
		Yes
European Directives		
Applicable directives	All applicable European directives have been considered in the determination of the Environment Agency initiated variation.	✓
The permit conditions		
Updating permit conditions during consolidation.	<p>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(s).</p> <p>The operator has agreed that the new conditions are acceptable.</p> <p>Certain template conditions have been amended to reflect current best practice. These changes have been developed in consultation with industry having regard to the relevant legislation as follows:</p> <p>Condition 1.4 Generic condition added to reflect the requirements of the Waste Framework Directive</p> <p>2.5 Condition added to ensure that all plant, equipment and pipe work on site is installed to an appropriate</p>	✓

Aspect considered	Justification / Detail	Criteria met
		Yes
	<p>standard, consistent with the requirements of a landfill permit with an associated leachate treatment plant</p> <p>3.1.3 Condition added for all installations subject to the Industrial Emissions Directive (IED) for period monitoring of soil and groundwater.</p> <p>4.2.2. Amended to ensure that information on ‘annual production/ treatment’ (Schedule 4, Table S4.2) is provided in February each year where performance reports may be submitted at other times of the year.</p> <p>4.2.2(a) Text expanded to clarify the details we require in a performance report.</p> <p>4.3.1 Generic notifications condition added</p> <p>Schedule 1, table S1.1. Activity references amended to reflect changes introduced by Industrial Emissions Directive (2010/75/EU).</p> <p>Table S3.2. Include standard monitoring requirements for other surface water monitoring.</p> <p>Table S4.3. Amended to include natural gas as an energy source for consistency with other sectors.</p> <p>Schedule 6. Definitions added to clarify meaning of:</p> <ul style="list-style-type: none"> • Exceeded • Hazardous substance • Previous year <p>See also Schedule 1 in the reviewed permit.</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 have reviewed the waste types in the existing permit to ensure only those codes appropriate for the activities are included in the permit.</p>	✓
Improvement conditions	Improvement conditions IC1, IC2, IC3 and IC6 have been removed from the permit as they are longer considered	✓

Aspect considered	Justification / Detail	Criteria met
		Yes
	necessary. IC4 and IC5 have been retained however the text has been amended to refer to updated guidance, the deadline for response has also been amended to 18 months from the issue of this variation.	
Operating techniques	We have specified that the operator must operate the permit in accordance with referenced operating techniques. We have reviewed the Operating techniques in the existing permit to ensure only relevant and up to date operating techniques are listed in the permit.	✓
Emission limits	There are no new emission limits set.	✓
Monitoring	We have amended the monitoring requirement for 'other' surface water monitoring in table S3.2. This reflects the standard monitoring suite set out in the current permit template for this sector and is now common in permits for other leachate treatment plants discharging to surface water.	✓
Reporting	Reporting requirements remain unchanged.	✓