

**Notice of refusal**

Environmental Permitting (England and Wales) Regulations  
2016

**Refusal of an application for a variation of a permit**

Application number: EPR/AB3700LS/V003

Permit number: EPR/AB3700LS

To: Biffa Waste Services Limited  
Coronation Road  
Cressex  
High Wycombe  
Buckinghamshire  
HP12 3TZ

The Environment Agency has considered your application. We give notice that the application for a variation of a permit is refused.

The reasons for this decision are outlined in the attached schedule.

Name	Date
<b>Claire Roberts</b>	<b>28/10/2020</b>

Authorised on behalf of the Environment Agency

# Schedule

## Reasons for refusal

The Application has been refused. The reasons for refusal are:

- The Applicant has not demonstrated that the proposed measures for the management and control of potential fugitive emissions to air (specifically, Volatile Organic Compounds (“VOCs”) and dust) from the proposed waste treatment activities (soil washing, thermal desorption, solidification and stabilisation process) are BAT. Alongside this, we have reviewed the Dust Emissions Management Plan (“DEMP”) provided as part of the Application and concluded that it is not adequate.
- The Applicant has not provided adequate waste pre-acceptance and waste acceptance procedures for the proposed waste treatment activities including the soil washing facility, thermal desorption facility and solidification and stabilisation, to demonstrate:
  - That the wastes proposed are suitable for treatment.
  - That only suitable wastes will be accepted for treatment following appropriate checking and characterisation (that is, sampling and testing).
- The Applicant has not provided a H1 risk assessment with accurate and appropriate data to enable us to assess the environmental impact of the proposed discharge to sewer.
- We are not satisfied with the information provided regarding the sampling of treated output materials.
- We are not satisfied with the information provided regarding the coding of treated output materials.
- We are not satisfied with the information provided regarding pre-treatment of waste for thermal desorption.
- We do not have enough information about the design and operation of the stabilisation and solidification process.

The Applicant has not provided an adequate Odour Management Plan (“OMP”)