

# Notice of variation and consolidation with introductory note

The Environmental Permitting (England & Wales) Regulations 2016

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Drumcastle Limited

Oakleaf Farm  
Horton Road  
Stanwell Moor  
TW19 6AF

**Variation application number**

EPR/GP3333DU/V002

**Permit number**

EPR/GP3333DU

# Oakleaf Farm

## Permit number EPR/GP3333DU

### Introductory note

#### **This introductory note does not form a part of the notice**

Under the Environmental Permitting (England & Wales) Regulations 2016 (schedule 5, part 1, paragraph 19) a variation may comprise a consolidated permit reflecting the variations and a notice specifying the variations included in that consolidated permit.

Schedule 1 of the notice specifies the conditions that have been varied and schedule 2 comprises a consolidated permit which reflects the variations being made. Only the variations specified in schedule 1 are subject to a right of appeal.

#### **Changes introduced by this variation notice:**

This permit variation has been issued to implement the relevant requirements of Best Available Techniques (BAT) Conclusions set out in implementing decision (EU) 2018/1147 of 10 August 2018.

The Industrial Emissions Directive (IED) came into force on 7 January 2014 with the requirement to implement all relevant Best Available Techniques (BAT) Conclusions as described in the Commission Implementing Decision.

Article 21(3) of the IED requires the Environment Agency to review conditions in permits that it has issued and to ensure that the permit delivers compliance with relevant standards, within four years of the publication of updated decisions on Best Available Techniques (BAT) Conclusions. The BAT Conclusions for Waste Treatment (the BREF) was published on 17 August 2018 following a European Union wide review of BAT, implementing decision (EU) 2018/1147 of 10 August 2018.

The non-hazardous and inert waste: appropriate measures for permitted facilities guidance was published on the gov.uk website on 12 July 2021. This guidance sets out the standards that are relevant to regulated facilities with a permit to store, treat or transfer (or both) non-hazardous and inert wastes.

#### **Brief summary of the process**

Oakleaf Farm is a waste treatment facility, accepting non-hazardous waste for the purpose of producing Solid Recovered Fuel (SRF). The site is situated at Stanwell Moor, to the southwest of Heathrow Airport, approximately 1.5 km east of the M25. The installation is operated by Drumcastle Limited.

The site has the capacity to process up to 150,000 tonnes of waste per annum, accepting a maximum of 1000 tonnes of waste per day. The waste treatment facility will process commercial and industrial, municipal, and construction and demolition waste to make SRF which is produced under contract for use in cement kilns.

The permit allows Drumcastle Limited to operate the following installation and directly associated activities (DAA):

- Section 5.4 Part A1(b)(ii) - recovery or a mix of recovery and disposal of non-hazardous waste with a capacity exceeding 75 tonnes per day involving pre-treatment of waste for incineration or co-incineration;
- Storage of waste prior to treatment;
- Bulking of recyclable non-hazardous wastes recovered as an incidental part of the production of Solid Recovered Fuel;
- Storage of recovered SRF;
- Storage of recovered recyclables;
- Storage of fuel

The physical waste treatment process includes sorting, screening and shredding. Magnetic and air separators and hand picking is used to remove materials suitable for recycling. Materials suitable for SRF are further separated by air separation units.

Any materials that cannot be recovered or are not suitable for use in SRF will be stored within the process building prior to transfer to a suitable site for disposal.

All waste handling, processing and storage takes place within the dedicated process building on an impermeable concrete surface with a sealed drainage system. Uncontaminated runoff from external areas where no waste is stored, handled or treated is discharged to a soakaway, via an oil interceptor (emission point W1).

The site boundary for this permit is within a site boundary for an existing permitted waste site operated by Charles Morris Fertilizers Limited, for the treatment of inert wastes (permit number EAWML 83308). We are satisfied that the waste operations undertaken at the site will be clearly distinguishable between the two permits. All waste handling, processing, treatment and storage under EPR/GP3333DU is separate to other waste on site and confined within a dedicated process building.

The schedules specify the changes made to the permit.

The status log of a permit sets out the permitting history, including any changes to the permit reference number.

<b>Status log of the permit</b>		
<b>Description</b>	<b>Date</b>	<b>Comments</b>
Application EPR/XP3737AF/A001	Duly made 24/08/15	Application for a non-hazardous waste Materials Recovery Facility (MRF) producing solid recovered fuel (SRF).
Additional information received EPR/XP3737AF/A001	08/09/15	Confirmation that hazardous waste codes have been removed from application (Amended Environmental Management System (EMS V02).
Additional information received EPR/XP3737AF/A001	10/12/15	Fire Prevention Plan, 14158 – Wastebeater Recycling Version 05 – December 2015.
Permit determined EPR/XP3737AF (PAS Billing ref. XP3737AF)	11/01/16	Original permit issued to Amber Merchants Limited (Trading as Wastebeater Recycling Limited).
Application EPR/GP3333DU/T001 (full transfer of permit EPR/XP3737AF)	Duly made 15/03/16	Application to transfer the permit in full to Drumcastle Limited.
Transfer determined EPR/GP3333DU (PAS Billing ref. GP3333DU)	28/04/16	Full transfer of permit complete.
Environment Agency Non-hazardous waste Sector Review Variation number EPR/GP3333DU/V002	09/09/21	Non-hazardous waste Sector Review – response to the Regulation 61 Notice dated 28/04/2021.
Additional information	15/12/21	Response for the Request for Further Information dated 26/11/2021 - document titled 'Response to Regulation 61 Notice' dated December 2021 and the appended EMS document, submitted in response to the RFI.
Environment Agency Non-hazardous waste Sector Review	17/03/22	Varied and consolidated permit issued in modern condition format.

<b>Status log of the permit</b>		
<b>Description</b>	<b>Date</b>	<b>Comments</b>
Variation number EPR/GP3333DU/V002 Permit determined EPR/GP3333DU PAS/Billing ref. WP3904MW		

End of introductory note

# Notice of variation and consolidation

## The Environmental Permitting (England and Wales) Regulations 2016

The Environment Agency in exercise of its powers under regulation 20 of the Environmental Permitting (England and Wales) Regulations 2016 varies

### Permit number

EPR/GP3333DU

### Issued to

**Drumcastle Limited** (“the operator”)

whose registered office

**43 Lockview Road**

**Belfast**

**Northern Ireland**

**BT9 5FJ**

company registration number NI630846

to operate a regulated facility at

**Oakleaf Farm**

**Horton Road**

**Stanwell Moor**

**TW19 6AF**

to the extent set out in the schedules.

The notice shall take effect from 17/03/2022.

Name	Date
Claire Roberts	17/03/2022

Authorised on behalf of the Environment Agency

## **Schedule 1**

The following conditions and tables were varied as a result of Environment Agency Initiated Variation:

- Conditions 2.4.1 and 2.4.2 have been added to implement the Improvement Conditions detailed Table S1.3.
- Condition 3.3.2 has been added to enable the Environment Agency to request updated Odour Management Plan.
- Conditions 2.5.1 – 2.5.4 have been added because they are relevant for the implementation of the monitoring specified in Table S3.1.
- Conditions 4.2.2 and 4.2.3 have been added because they are relevant to all installation activities.
- Table S1.1 as referenced in Condition 2.1.1 has been amended to clearly define the activities that are undertaken at the site and to apply relevant limits to them.
- Table S1.2 as referenced in Conditions 2.3.1 and 2.3.2 has been amended to incorporate operating techniques documents submitted in response to the Regulation 61 Notice.
- Table S1.3 as referenced in Conditions 2.4.1 and 2.4.2 has been added to request for a review of the building and treatment equipment at the site and for the submission of a revised Odour Management Plan.
- Table S2.2 as referenced in Conditions 2.3.4 has amended by deleting the waste types that are not appropriate to the permitted site activities.
- Table S3.1 as referenced in Conditions 3.5.1 has been amended to specify the parameter that need monitoring in the uncontaminated surface runoff.
- Table S3.2 has been deleted because there is no discharge of surface runoff to sewer.
- Tables S4.1 – S4.4 have been added to implement the reporting requirements of the permit.

## **Schedule 2 – consolidated permit**

Consolidated permit issued as a separate document.

# Permit

## The Environmental Permitting (England and Wales) Regulations 2016

### Permit number

**EPR/GP3333DU**

This is the consolidated permit referred to in the variation and consolidation notice for application EPR/GP3333DU/V002 authorising,

**Drumcastle Limited** (“the operator”),

whose registered office is

**43 Lockview Road**

**Belfast**

**Northern Ireland**

**BT9 5FJ**

company registration number NI630846

to operate an installation at

**Oakleaf Farm**

**Horton Road**

**Stanwell Moor**

**TW19 6AF**

to the extent authorised by and subject to the conditions of this permit.

Name	Date
Claire Roberts	17/03/2022

Authorised on behalf of the Environment Agency

# Conditions

## Management

### 1.1 General management

- 1.1.1 The operator shall manage and operate the activities:
- (a) in accordance with a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances, closure and those drawn to the attention of the operator as a result of complaints; and
  - (b) using sufficient competent persons and resources.
- 1.1.2 Records demonstrating compliance with condition 1.1.1 shall be maintained.
- 1.1.3 Any person having duties that are or may be affected by the matters set out in this permit shall have convenient access to a copy of it kept at or near the place where those duties are carried out.
- 1.1.4 The operator shall comply with the requirements of an approved competence scheme.

### 1.2 Energy efficiency

- 1.2.1 The operator shall:
- (a) take appropriate measures to ensure that energy is used efficiently in the activities;
  - (b) review and record at least every four years whether there are suitable opportunities to improve the energy efficiency of the activities; and
  - (c) take any further appropriate measures identified by a review.

### 1.3 Efficient use of raw materials

- 1.3.1 The operator shall:
- (a) take appropriate measures to ensure that raw materials and water are used efficiently in the activities;
  - (b) maintain records of raw materials and water used in the activities;
  - (c) review and record at least every four years whether there are suitable alternative materials that could reduce environmental impact or opportunities to improve the efficiency of raw material and water use; and
  - (d) take any further appropriate measures identified by a review.

### 1.4 Avoidance, recovery and disposal of wastes produced by the activities

- 1.4.1 The operator shall take appropriate measures to ensure that:
- (a) the waste hierarchy referred to in Article 4 of the Waste Framework Directive is applied to the generation of waste by the activities; and
  - (b) any waste generated by the activities is treated in accordance with the waste hierarchy referred to in Article 4 of the Waste Framework Directive; and
  - (c) where disposal is necessary, this is undertaken in a manner which minimises its impact on the environment.



- 1.4.2 The operator shall review and record at least every four years whether changes to those measures should be made and take any further appropriate measures identified by a review.

## **2 Operations**

### **2.1 Permitted activities**

- 2.1.1 The operator is only authorised to carry out the activities specified in schedule 1 table S1.1 (the “activities”).
- 2.1.2 Waste authorised by this permit shall be clearly distinguished from any other waste on the site.

### **2.2 The site**

- 2.2.1 The activities shall not extend beyond the site, being the land shown edged in green on the site plan at schedule 7 to this permit.

### **2.3 Operating techniques**

- 2.3.1 The activities shall, subject to the conditions of this permit, be operated using the techniques and in the manner described in the documentation specified in schedule 1, table S1.2, unless otherwise agreed in writing by the Environment Agency.
- 2.3.2 If notified by the Environment Agency that the activities are giving rise to pollution, the operator shall submit to the Environment Agency for approval within the period specified, a revision of any plan or other documentation (“plan”) specified in schedule 1, table S1.2 or otherwise required under this permit which identifies and minimises the risks of pollution relevant to that plan, and shall implement the approved revised plan in place of the original from the date of approval, unless otherwise agreed in writing by the Environment Agency.
- 2.3.3 Any raw materials or fuels listed in schedule 2 table S2.1 shall conform to the specifications set out in that table.
- 2.3.4 Waste shall only be accepted if:
- (a) it is of a type and quantity listed in schedule 2 table S2.2; and
  - (b) it conforms to the description in the documentation supplied by the producer and holder.
- 2.3.5 The operator shall ensure that where waste produced by the activities is sent to a relevant waste operation, that operation is provided with the following information, prior to the receipt of the waste:
- (a) the nature of the process producing the waste;
  - (b) the composition of the waste;
  - (c) the handling requirements of the waste;
  - (d) the hazardous property associated with the waste, if applicable; and
  - (e) the waste code of the waste.
- 2.3.6 The operator shall ensure that where waste produced by the activities is sent to a landfill site, it meets the waste acceptance criteria for that landfill.

### **2.4 Improvement programme**

- 2.4.1 The operator shall complete the improvements specified in schedule 1 table S1.3 by the date specified in that table unless otherwise agreed in writing by the Environment Agency.

- 2.4.2 Except in the case of an improvement which consists only of a submission to the Environment Agency, the operator shall notify the Environment Agency within 14 days of completion of each improvement.

### **3 Emissions and monitoring**

#### **3.1 Emissions to water, air or land**

- 3.1.1 There shall be no point source emissions to water, air or land except from the sources and emission points listed in schedule 3 tables S3.1.
- 3.1.2 The limits given in schedule 3 shall not be exceeded.
- 3.1.3 Periodic monitoring shall be carried out at least once every 5 years for groundwater and 10 years for soil, unless such monitoring is based on a systematic appraisal of the risk of contamination.

#### **3.2 Emissions of substances not controlled by emission limits**

- 3.2.1 Emissions of substances not controlled by emission limits (excluding odour) shall not cause pollution. The operator shall not be taken to have breached this condition if appropriate measures, including, but not limited to, those specified in any approved emissions management plan, have been taken to prevent or where that is not practicable, to minimise, those emissions.
- 3.2.2 The operator shall:
- (a) if notified by the Environment Agency that the activities are giving rise to pollution, submit to the Environment Agency for approval within the period specified, an emissions management plan which identifies and minimises the risks of pollution from emissions of substances not controlled by emission limits;
  - (b) implement the approved emissions management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.
- 3.2.3 All liquids in containers, whose emission to water or land could cause pollution, shall be provided with secondary containment, unless the operator has used other appropriate measures to prevent or where that is not practicable, to minimise, leakage and spillage from the primary container.

#### **3.3 Odour**

- 3.3.1 Emissions from the activities shall be free from odour at levels likely to cause pollution outside the site, as perceived by an authorised officer of the Environment Agency, unless the operator has used appropriate measures, including, but not limited to, those specified in any approved odour management plan, to prevent or where that is not practicable to minimise the odour.
- 3.3.2 The operator shall:
- (a) if notified by the Environment Agency that the activities are giving rise to pollution outside the site due to odour, submit to the Environment Agency for approval within the period specified, an odour management plan which identifies and minimises the risks of pollution from odour;
  - (b) implement the approved odour management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.

#### **3.4 Noise and vibration**

- 3.4.1 Emissions from the activities shall be free from noise and vibration at levels likely to cause pollution outside the site, as perceived by an authorised officer of the Environment Agency, unless the operator has used appropriate measures, including, but not limited to, those specified in any

approved noise and vibration management plan to prevent or where that is not practicable to minimise the noise and vibration.

3.4.2 The operator shall:

- (a) if notified by the Environment Agency that the activities are giving rise to pollution outside the site due to noise and vibration, submit to the Environment Agency for approval within the period specified, a noise and vibration management plan which identifies and minimises the risks of pollution from noise and vibration;
- (b) implement the approved noise and vibration management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.

### **3.5 Monitoring**

3.5.1 The operator shall, unless otherwise agreed in writing by the Environment Agency, undertake the monitoring specified in the following tables in schedule 3 to this permit:

- (a) point source emissions specified in table S3.1.

3.5.2 The operator shall maintain records of all monitoring required by this permit including records of the taking and analysis of samples, instrument measurements (periodic and continual), calibrations, examinations, tests and surveys and any assessment or evaluation made on the basis of such data.

3.5.3 Monitoring equipment, techniques, personnel and organisations employed for the emissions monitoring programme and the environmental or other monitoring specified in condition 3.5.1 shall have either MCERTS certification or MCERTS accreditation (as appropriate), where available, unless otherwise agreed in writing by the Environment Agency.

3.5.4 Permanent means of access shall be provided to enable sampling/monitoring to be carried out in relation to the emission points specified in schedule 3 table S3.1 unless otherwise agreed in writing by the Environment Agency.

### **3.6 Pests**

3.6.1 The activities shall not give rise to the presence of pests which are likely to cause pollution, hazard or annoyance outside the boundary of the site. The operator shall not be taken to have breached this condition if appropriate measures, including, but not limited to, those specified in any approved pests management plan, have been taken to prevent or where that is not practicable, to minimise the presence of pests on the site.

3.6.2 The operator shall:

- (a) if notified by the Environment Agency, submit to the Environment Agency for approval within the period specified, a pests management plan which identifies and minimises risks of pollution from pests;
- (b) implement the pests management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.

### **3.7 Fire prevention**

3.7.1 The operator shall take all appropriate measures to prevent fires on site and minimise the risk of pollution from them including, but not limited to, those specified in any approved fire prevention plan.

## 4 Information

### 4.1 Records

- 4.1.1 All records required to be made by this permit shall:
- (a) be legible;
  - (b) be made as soon as reasonably practicable;
  - (c) if amended, be amended in such a way that the original and any subsequent amendments remain legible, or are capable of retrieval; and
  - (d) be retained, unless otherwise agreed in writing by the Environment Agency, for at least 6 years from the date when the records were made, or in the case of the following records until permit surrender:
    - (i) off-site environmental effects; and
    - (ii) matters which affect the condition of the land and groundwater.
- 4.1.2 The operator shall keep on site all records, plans and the management system required to be maintained by this permit, unless otherwise agreed in writing by the Environment Agency.

### 4.2 Reporting

- 4.2.1 The operator shall send all reports and notifications required by the permit to the Environment Agency using the contact details supplied in writing by the Environment Agency.
- 4.2.2 A report or reports on the performance of the activities over the previous year shall be submitted to the Environment Agency by 31 January (or other date agreed in writing by the Environment Agency) each year. The report(s) shall include as a minimum:
- (a) a review of the results of the monitoring and assessment carried out in accordance with the permit including an interpretive review of that data;
  - (b) the annual production/treatment data set out in schedule 4 table S4.2; and
  - (c) the performance parameters set out in schedule 4 table S4.3 using the forms specified in table S4.4 of that schedule.
- 4.2.3 Within 28 days of the end of the reporting period the operator shall, unless otherwise agreed in writing by the Environment Agency, submit reports of the monitoring and assessment carried out in accordance with the conditions of this permit, as follows:
- (a) in respect of the parameters and emission points specified in schedule 4 table S4.1;
  - (b) for the reporting periods specified in schedule 4 table S4.1 and using the forms specified in schedule 4 table S4.4; and
  - (c) giving the information from such results and assessments as may be required by the forms specified in those tables.
- 4.2.4 The operator shall, unless notice under this condition has been served within the preceding four years, submit to the Environment Agency, within six months of receipt of a written notice, a report assessing whether there are other appropriate measures that could be taken to prevent, or where that is not practicable, to minimise pollution.
- 4.2.5 Within 1 month of the end of each quarter, the operator shall submit to the Environment Agency using the form made available for the purpose, the information specified on the form relating to the site and the waste accepted and removed from it during the previous quarter.

## 4.3 Notifications

### 4.3.1 In the event:

- (a) that the operation of the activities gives rise to an incident or accident which significantly affects or may significantly affect the environment, the operator must immediately—
  - (i) inform the Environment Agency,
  - (ii) take the measures necessary to limit the environmental consequences of such an incident or accident, and
  - (iii) take the measures necessary to prevent further possible incidents or accidents;
- (b) of a breach of any permit condition the operator must immediately—
  - (i) inform the Environment Agency, and
  - (ii) take the measures necessary to ensure that compliance is restored within the shortest possible time;
- (c) of a breach of permit condition which poses an immediate danger to human health or threatens to cause an immediate significant adverse effect on the environment, the operator must immediately suspend the operation of the activities or the relevant part of it until compliance with the permit conditions has been restored.

4.3.2 Any information provided under condition 4.3.1 shall be confirmed by sending the information listed in schedule 5 to this permit within the time period specified in that schedule.

4.3.3 Where the Environment Agency has requested in writing that it shall be notified when the operator is to undertake monitoring and/or spot sampling, the operator shall inform the Environment Agency when the relevant monitoring and/or spot sampling is to take place. The operator shall provide this information to the Environment Agency at least 14 days before the date the monitoring is to be undertaken.

4.3.4 The Environment Agency shall be notified within 14 days of the occurrence of the following matters, except where such disclosure is prohibited by Stock Exchange rules:

Where the operator is a registered company:

- (a) any change in the operator's trading name, registered name or registered office address; and
- (b) any steps taken with a view to the operator going into administration, entering into a company voluntary arrangement or being wound up.

Where the operator is a corporate body other than a registered company:

- (a) any change in the operator's name or address; and
- (b) any steps taken with a view to the dissolution of the operator.

In any other case:

- (a) the death of any of the named operators (where the operator consists of more than one named individual);
- (b) any change in the operator's name(s) or address(es); and
- (c) any steps taken with a view to the operator, or any one of them, going into bankruptcy, entering into a composition or arrangement with creditors, or, in the case of them being in a partnership, dissolving the partnership.

4.3.5 Where the operator proposes to make a change in the nature or functioning, or an extension of the activities, which may have consequences for the environment and the change is not otherwise the subject of an application for approval under the Regulations or this permit:

- (a) the Environment Agency shall be notified at least 14 days before making the change; and

(b) the notification shall contain a description of the proposed change in operation.

4.3.6 The Environment Agency shall be given at least 14 days' notice before implementation of any part of the site closure plan.

#### **4.4 Interpretation**

4.4.1 In this permit the expressions listed in schedule 6 shall have the meaning given in that schedule.

4.4.2 In this permit references to reports and notifications mean written reports and notifications, except where reference is made to notification being made "immediately", in which case it may be provided by telephone.

# Schedule 1 – Operations

<b>Table S1.1 activities</b>			
<b>Activity reference</b>	<b>Activity listed in Schedule 1 of the EP Regulations</b>	<b>Description of specified activity and WFD Annex I and II operations</b>	<b>Limits of specified activity and waste types</b>
AR1	Section 5.4 Part A1(b)(ii) - Recovery or a mix of recovery and disposal of non-hazardous waste with a capacity exceeding 75 tonnes per day involving pre-treatment of waste for incineration or co-incineration	R3 - Recycling/reclamation of organic substances which are not used as solvents (including composting and other biological transformation processes)	<p>From receipt of non-hazardous waste to its use in the production of Solid Recovered Fuel (SRF).</p> <p>Physical treatment of solid non-hazardous waste, including manual sorting, separation, screening, baling and shredding for the purpose of producing Solid Recovered Fuel for recovery.</p> <p>Waste treatment shall take place within an enclosed building.</p> <p>Daily throughput limited to 1000 tonnes per day.</p> <p>Treatment shall be on an impermeable surface with sealed drainage system.</p> <p>Waste types as specified in Table S2.2</p>
<b>Directly Associated Activity</b>			
AR2	N/A	<p>Storage of waste prior to treatment</p> <p>R13 – Storage of wastes pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced)</p>	<p>Receipt and storage of non-hazardous waste pending its use in the production of SRF.</p> <p>All waste storage shall take place within an enclosed building.</p> <p>Storage at any one time is limited to 750 tonnes.</p> <p>Incoming wastes shall be stored on an impermeable surface with sealed drainage.</p> <p>Waste types as specified in Table S2.2</p>
AR3	N/A	<p>Bulking of recyclable non-hazardous wastes recovered as an incidental part of the production of SRF</p> <p>R3 – Recycling/ reclamation of organic substances which are not used as solvents</p> <p>R4 - Recycling/ reclamation of metals and metal compounds</p> <p>R5 - Recycling/ reclamation of other inorganic substances</p>	<p>Treatment of residual waste generated from SRF production.</p> <p>All bulking activities shall take place within an enclosed building.</p> <p>Treatment shall be on an impermeable surface with sealed drainage system.</p>

<b>Table S1.1 activities</b>			
<b>Activity reference</b>	<b>Activity listed in Schedule 1 of the EP Regulations</b>	<b>Description of specified activity and WFD Annex I and II operations</b>	<b>Limits of specified activity and waste types</b>
AR4	N/A	Storage of raw materials and fuel storage	From the receipt of raw materials to despatch for use within the facility. Storage of fuel for on-site vehicles and machinery.
AR5	N/A	Storage of recovered SRF and recyclables pending removal from the site	Storage of SRF and recyclables shall take place within an enclosed building. Storage shall be on an impermeable surface with sealed drainage system.
AR6	N/A	Uncontaminated roof water collection and storage	Collection and storage of uncontaminated roof to its discharge to soakaway, marked (W1 - EXSMH103 on drawing 14158/108) via oil water separator.

<b>Table S1.2 Operating techniques</b>		
<b>Description</b>	<b>Parts</b>	<b>Date Received</b>
Application EPR/XP3737AF/A001	Part B2 and B3 of the application and supporting documents Including the Odour Management Plan (14158 – Wastebeater Recycling Ltd, Version 00, February 2015)	Duly Made 24/08/2015
Additional information EPR/XP3737AF/A001	Environmental Management System (EMS; V02), with amended waste code list	08/09/2015
Additional information - Response to Schedule 5 notice. EPR/XP3737AF/A001	Fire Prevention Plan, 14158 – Wastebeater Recycling Version 05 – December 2015	10/12/2015
Application EPR/GP3333DU/V002	Documents received in response to the Regulation 61 Notice including: <ul style="list-style-type: none"> <li>▪ Sections 1, 2, 3.1, 3.2, 5, 6 of the response letter dated 10/08/2021.</li> <li>▪ All parts of the Annex 1 of the Regulation 61 Notice response.</li> </ul>	09/09/2021
Additional information received in response to the Request for Further Information (RFI) dated 26/11/2021	Document titled 'Response to Regulation 61 Notice' dated December 2021 and the appended EMS document, submitted in response to the RFI, excluding response to questions 7, 8 and 9 of the RFI and the drawing reference 16060-030.	15/12/2021



<b>Table S1.3 Improvement programme requirements</b>		
<b>Reference</b>	<b>Requirement</b>	<b>Date</b>
IP1	<p>The operator shall carry out detailed review of the existing buildings and treatment equipment at the site to ensure that they are in accordance with the requirements specified in the Non-hazardous and inert waste: appropriate measures for permitted facilities guidance and BAT 14 of the Waste Treatment BAT Conclusions.</p> <p>Following the review, the operator shall submit a written report to the Environment Agency for approval outlining measures and procedures that are in place in the buildings to prevent and/or reduce fugitive emissions of dust, odour and noise. Based on the outcome of the review, the report should include recommendations for improvements and timescales for implementation of the identified improvements.</p> <p>The operator shall implement any improvements to a timetable agreed with the Environment Agency.</p>	17/06/2022
IP2	<p>The operator shall submit an updated odour management plan to the Environment Agency for written approval. The plan shall take into account the appropriate measures for odour control specified in the Non-hazardous and inert waste: appropriate measures for permitted facilities guidance published 12 July 2021 and H4 - Odour Management.</p> <p>Once the odour management plan has been agreed with the Environment Agency, the installation must be operated in accordance with this management plan.</p>	17/06/2022

## Schedule 2 – Waste types, raw materials and fuels

Raw materials and fuel description	Specification
-	-

<b>Maximum quantity</b>	<b>The total quantity of waste accepted at the site shall not exceed 150,000 tonnes per year</b>
<b>Exclusions</b>	<b>Wastes having any of the following characteristics shall not be accepted:</b> <ul style="list-style-type: none"> <li>▪ <b>Wastes consisting solely or mainly of dusts, powders or loose fibres.</b></li> <li>▪ <b>Liquid waste/sludge.</b></li> <li>▪ <b>Odorous waste.</b></li> </ul>
<b>Waste code</b>	<b>Description</b>
<b>03</b>	<b>Wastes from wood processing and the production of panels and furniture, pulp, paper and cardboard</b>
<b>03 01</b>	<b>wastes from wood processing and the production of panels and furniture</b>
03 01 05	sawdust, shavings, cuttings, wood, particle board and veneer other than those mentioned in 03 01 04
<b>07</b>	<b>Wastes from organic chemical processes</b>
<b>07 02</b>	<b>wastes from the MFSU of plastics, synthetic rubber and man-made fibres</b>
07 02 13	waste plastic
<b>15</b>	<b>Waste packaging, absorbents, wiping cloths, filter materials and protective clothing not otherwise specified</b>
<b>15 01</b>	<b>packaging (including separately collected municipal packaging waste)</b>
15 01 01	paper and cardboard packaging
15 01 02	plastic packaging
15 01 03	wooden packaging
15 01 05	composite packaging
15 01 06	mixed packaging
15 01 09	textile packaging
<b>16</b>	<b>Wastes not otherwise specified in the list</b>
<b>16 01</b>	<b>end-of-life vehicles from different means of transport (including off-road machinery) and wastes from dismantling of end-of-life vehicles and vehicle maintenance (except 13, 14, 16 06 and 16 08)</b>
16 01 19	plastic
<b>16 03</b>	<b>off-specification batches and unused products</b>
16 03 06	organic wastes other than those mentioned in 16 03 05
<b>17</b>	<b>Construction and demolition wastes (including excavated soil from contaminated sites)</b>
<b>17 02</b>	<b>wood, glass and plastic</b>

<b>Table S2.2 Permitted waste types and quantities for storage and use in the production of SRF</b>	
<b>Maximum quantity</b>	<b>The total quantity of waste accepted at the site shall not exceed 150,000 tonnes per year</b>
<b>Exclusions</b>	<b>Wastes having any of the following characteristics shall not be accepted:</b> <ul style="list-style-type: none"> <li>▪ <b>Wastes consisting solely or mainly of dusts, powders or loose fibres.</b></li> <li>▪ <b>Liquid waste/sludge.</b></li> <li>▪ <b>Odorous waste.</b></li> </ul>
<b>Waste code</b>	<b>Description</b>
17 02 01	wood
17 02 03	plastic
<b>17 06</b>	<b>insulation materials and asbestos-containing construction materials</b>
17 06 04	insulation materials other than those mentioned in 17 06 01 and 17 06 03
<b>17 09</b>	<b>other construction and demolition wastes</b>
17 09 04	mixed construction and demolition wastes other than those mentioned in 17 09 01, 17 09 02 and 17 09 03
<b>19</b>	<b>Wastes from waste management facilities, off-site waste water treatment plants and the preparation of water intended for human consumption and water for industrial use</b>
<b>19 12</b>	<b>wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified</b>
19 12 01	paper and cardboard
19 12 04	plastic and rubber
19 12 07	wood other than that mentioned in 19 12 06
19 12 08	textiles
19 12 10	combustible waste (refuse derived fuel)
19 12 12	other wastes (including mixtures of materials) from mechanical treatment of wastes other than those mentioned in 19 12 11
<b>20</b>	<b>Municipal wastes (household waste and similar commercial, industrial and institutional wastes) including separately collected fractions</b>
<b>20 01</b>	<b>separately collected fractions (except 15 01)</b>
20 01 01	paper and cardboard
20 01 10	clothes
20 01 11	textiles
20 01 38	wood other than that mentioned in 20 01 37
20 01 39	plastics
<b>20 03</b>	<b>other municipal wastes</b>
20 03 01	mixed municipal waste
20 03 02	waste from markets
20 03 03	street-cleaning residues
20 03 07	bulky waste

## Schedule 3 – Emissions and monitoring

<b>Table S3.1 Point Source emissions to water (other than sewer) and land – emission limits and monitoring requirements</b>						
<b>Emission point ref. &amp; location</b>	<b>Source</b>	<b>Parameter</b>	<b>Limit (incl. unit)</b>	<b>Reference Period</b>	<b>Monitoring frequency</b>	<b>Monitoring standard or method</b>
W1 (EXSMH103 on drawing 14158/108)	Uncontaminated surface runoff from yard areas, roofs and down pipes (soakaway via an oil interceptor)	Oil/grease	No visible oil or grease	--	Monthly	Visual assessment

## Schedule 4 – Reporting

Parameters, for which reports shall be made, in accordance with conditions of this permit, are listed below.

<b>Table S4.1 Reporting of monitoring data</b>			
<b>Parameter</b>	<b>Emission or monitoring point/reference</b>	<b>Reporting period</b>	<b>Period begins</b>
Point source emissions to water Parameters as required by condition 3.5.1	W1	Every 12 months	1 January

<b>Table S4.2: Annual production/treatment</b>	
<b>Parameter</b>	<b>Units</b>
SRF produced	tonnes
Ferrous metals recovered from SRF process	tonnes
Other fractions recovered from SRF process	tonnes

<b>Table S4.3 Performance parameters</b>		
<b>Parameter</b>	<b>Frequency of assessment</b>	<b>Units</b>
Water usage	Annually	m <sup>3</sup>
Energy usage	Annually	MWh
Other performance parameters	Annually	tonnes per production unit

<b>Table S4.4 Reporting forms</b>		
<b>Parameter</b>	<b>Reporting form</b>	<b>Form version number and date</b>
Water usage	Water Usage Reporting Form, or other form as agreed in writing by the Environment Agency	Version 1, 08/03/2021
Energy usage	Energy Usage Reporting Form, or other form as agreed in writing by the Environment Agency	Version 1, 08/03/2021
Other performance parameters	Other Performance Parameters Reporting Form, or other form as agreed in writing by the Environment Agency	Version 1, 08/03/2021

# Schedule 5 – Notification

These pages outline the information that the operator must provide.

Units of measurement used in information supplied under Part A and B requirements shall be appropriate to the circumstances of the emission. Where appropriate, a comparison should be made of actual emissions and authorised emission limits.

If any information is considered commercially confidential, it should be separated from non-confidential information, supplied on a separate sheet and accompanied by an application for commercial confidentiality under the provisions of the EP Regulations.

## Part A

Permit Number	
Name of operator	
Location of Facility	
Time and date of the detection	

<b>(a) Notification requirements for any malfunction, breakdown or failure of equipment or techniques, accident, or emission of a substance not controlled by an emission limit which has caused, is causing or may cause significant pollution</b>	
<b>To be notified within 24 hours of detection</b>	
Date and time of the event	
Reference or description of the location of the event	
Description of where any release into the environment took place	
Substances(s) potentially released	
Best estimate of the quantity or rate of release of substances	
Measures taken, or intended to be taken, to stop any emission	
Description of the failure or accident.	

<b>(b) Notification requirements for the breach of a limit</b>	
<b>To be notified within 24 hours of detection unless otherwise specified below</b>	
Emission point reference/ source	
Parameter(s)	
Limit	
Measured value and uncertainty	
Date and time of monitoring	

<b>(b) Notification requirements for the breach of a limit</b>	
<b>To be notified within 24 hours of detection unless otherwise specified below</b>	
Measures taken, or intended to be taken, to stop the emission	

<b>Time periods for notification following detection of a breach of a limit</b>	
<b>Parameter</b>	<b>Notification period</b>

<b>(c) Notification requirements for the breach of permit conditions not related to limits</b>	
<b>To be notified within 24 hours of detection</b>	
Condition breached	
Date, time and duration of breach	
Details of the permit breach i.e. what happened including impacts observed.	
Measures taken, or intended to be taken, to restore permit compliance.	

<b>(d) Notification requirements for the detection of any significant adverse environmental effect</b>	
<b>To be notified within 24 hours of detection</b>	
Description of where the effect on the environment was detected	
Substances(s) detected	
Concentrations of substances detected	
Date of monitoring/sampling	

## **Part B – to be submitted as soon as practicable**

Any more accurate information on the matters for notification under Part A.	
Measures taken, or intended to be taken, to prevent a recurrence of the incident	

Measures taken, or intended to be taken, to rectify, limit or prevent any pollution of the environment which has been or may be caused by the emission	
The dates of any unauthorised emissions from the facility in the preceding 24 months.	

Name*	
Post	
Signature	
Date	

\* authorised to sign on behalf of the operator



## Schedule 6 – Interpretation

“accident” means an accident that may result in pollution.

“application” means the application for this permit, together with any additional information supplied by the operator as part of the application and any response to a notice served under Schedule 5 to the EP Regulations.

“appropriate measures” are set out in the “Non-hazardous and inert waste: appropriate measures for permitted facilities” guidance published 12 July 2021

“authorised officer” means any person authorised by the Environment Agency under section 108(1) of The Environment Act 1995 to exercise, in accordance with the terms of any such authorisation, any power specified in section 108(4) of that Act.

“emissions to land” includes emissions to groundwater.

“emissions of substances not controlled by emission limits” means emissions of substances to air, water or land from the activities, either from the emission points specified in schedule 3 or from other localised or diffuse sources, which are not controlled by an emission or background concentration limit.

“EP Regulations” means The Environmental Permitting (England and Wales) Regulations SI 2016 No.1154 and words and expressions used in this permit which are also used in the Regulations have the same meanings as in those Regulations.

“groundwater” means all water, which is below the surface of the ground in the saturation zone and in direct contact with the ground or subsoil.

“Hazardous property” has the meaning in Annex III of the Waste Framework Directive

“Industrial Emissions Directive” means DIRECTIVE 2010/75/EU OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 24 November 2010 on industrial emissions, as read in accordance with Schedule 1A to the Environmental Permitting (England and Wales) Regulations 2016.

“List of Wastes” means the list of wastes established by Commission Decision 2000/532/EC replacing Decision 94/3/EC establishing a list of wastes pursuant to Article 1(a) of Council Directive 75/442/EEC on waste and Council Decision 94/904/EC establishing a list of hazardous waste pursuant to Article 1(4) of Council Directive 91/689/EEC on hazardous waste.

“MCERTS” means the Environment Agency’s Monitoring Certification Scheme.

“Pests” means Birds, Vermin and Insects.

“quarter” means a calendar year quarter commencing on 1 January, 1 April, 1 July or 1 October.

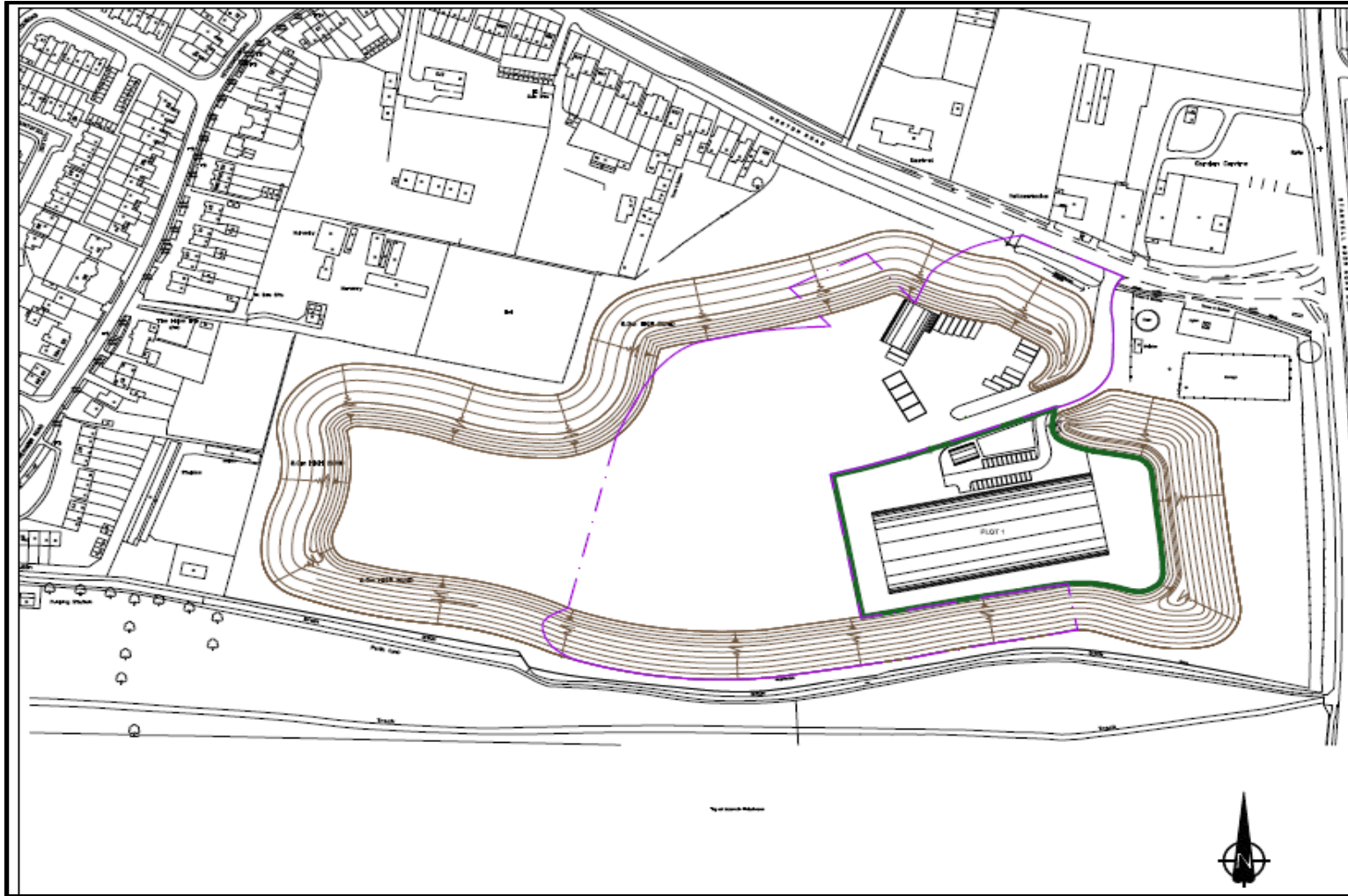
“recovery” means any of the operations provided for in Annex II to the Waste Framework Directive.

“Waste code” means the six digit code referable to a type of waste in accordance with the List of Wastes and in relation to hazardous waste, includes the asterisk.

“Waste Framework Directive” or “WFD” means Waste Framework Directive 2008/98/EC of the European Parliament and of the Council on waste, as read in accordance with Schedule 1A to the Environmental Permitting (England and Wales) Regulations 2016.

“year” means calendar year ending 31 December.

## Schedule 7 – Site plan



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END OF PERMIT

Permit number  
EPR/GP3333DU