

## Permitting Decisions- Environment Agency Initiated Variation

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We have issued an Environment Agency initiated variation for Oakleaf Farm operated by Drumcastle Limited following a review of the permit in accordance with Environmental Permitting (England and Wales) Regulations 2016, regulation 34(1).

The variation number is EPR/GP3333DU/V002.

We consider in reaching this 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.

### Permit Review

This Environment Agency has a duty, under the Environmental Permitting (England and Wales) Regulations 2016 (EPR), regulation 34(1), to periodically review permits.

Article 21(3) of the Industrial Emissions Directive (IED) also requires the Environment Agency to review conditions in permits to ensure that they deliver compliance with relevant standards, within four years of the publication of updated decisions on Best Available Techniques (BAT) Conclusions.

We have reviewed the permit for this activity and varied the notice to make a number of changes to reflect relevant standards and current best practice. These changes principally relate to the implementation of our technical guidance [Non-hazardous and inert waste: appropriate measures for permitted facilities](#) and the relevant requirements of the [BAT Conclusions for Waste Treatment](#), which have been incorporated into our guidance.

In this decision document, we set out the reasoning for the variation notice that we have issued.

It explains how we have reviewed and considered the techniques used by the operator against our technical guidance.

As well as considering the review of the operating techniques used by the operator, the consolidated variation notice takes into account and brings together in a single document all previous variations that relate to the original permit issue.

## Purpose of this document

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

- explains how the Environment Agency initiated variation has been determined;
- summarises the decision making process in the [decision considerations](#) section to show how the main relevant factors have been taken into account;
- highlights [key issues](#) in the determination.

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.

## Key issues of the decision

### Environment Agency led variation – permit review

We have carried out an Environment Agency initiated variation to the permit following a permit review as required by legislation to ensure that permit conditions deliver compliance with relevant legislative requirements and appropriate standards to protect the environment and human health.

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 us to review conditions in permits issued and to ensure that the permit delivers compliance with relevant standards. This must be 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. Relevant existing facilities must be in compliance with the BAT Conclusions within 4 years.

Our technical guidance [Non-hazardous and inert waste: appropriate measures for permitted facilities](#) explains the standards that are relevant for regulated facilities with an environmental permit to treat or transfer non-hazardous wastes.

We issued a notice under regulation 61(1) of the Environmental Permitting (England and Wales) Regulations 2016 (a Regulation 61 Notice) on 28/04/2021.

requiring the operator to provide information to confirm that the operation of their facility currently meets, or how it will subsequently meet, the standards in the Waste Treatment BAT Conclusions.

The notice required the operator to:

1. Provide a brief non-technical description of the regulated facility, including
  - all listed activities, waste operations and registered waste exemptions (if any)
  - a list of wastes handled at the site, the key stages in the “process” and the relevant disposal and recovery operations.
  - the scale of the operation i.e., the waste storage and daily treatment capacity of the process.
  - a brief description of the principal releases to air, land and water including noise, dust and odour, along with a description of any abatement techniques and site plan.
  - description of the site location and any key sensitive receptors.
2. Identify the BAT conclusions that are applicable to the facility’s operations. Confirm whether or not the operations comply with the requirements.
3. Where operations are not currently complying, the operator was required to provide:
  - details of how the relevant standards and requirements will be met.
  - details of how they will fully comply with the requirement by 17 August 2022.
  - justification as to why an alternative technique is appropriate and will achieve an equivalent level of environmental protection to the standards in the BAT Conclusion.
  - details on any activities they intend to cease operating by the compliance date (August 2022).

Confirm whether they operate a medium combustion plant or specified generator (as per Schedule 25A or 25B of EPR 2016)

The [Non-hazardous and inert waste: appropriate measures for permitted facilities](#) guidance was published on 12 July 2021 on gov.uk. This technical guidance explains the standards that are relevant to regulated facilities with an environmental permit to store, treat or transfer non-hazardous waste, providing relevant standards (appropriate measures) for those sites. The operators were notified about the new guidance and were advised to consider them in their submissions.

The standards described in our technical guidance are split into chapters:

- General management appropriate measures
- Waste pre-acceptance, acceptance and tracking appropriate measures
- Waste storage, segregation and handling appropriate measures
- Waste treatment appropriate measures

- Emissions control appropriate measures
- Emissions monitoring and limits appropriate measures
- Process efficiency appropriate measures

Our assessment of the responses received from the operator are summarised in Table 1.

The Regulation 61 Notice required the operator to confirm whether they could comply with the standards described in each of these chapters. Table 1 below provides a summary of the response received and our assessment of it. The overall status of compliance with the standards (appropriate measures) is indicated in the table as:

NA – Not Applicable

CC – Currently Compliant

FC – Compliant in the future (through improvement conditions set in permit)

NC/IC – Not Compliant; Improvement/New Condition included

### **Regulation 61 Response**

The Regulation 61 notice response from the Operator was received on 09/09/2021.

We considered that the response did not contain sufficient information for us to commence determination of the permit review.

We needed further information to complete our permit review assessment.

We issued a request for further information (RFI) by email to the operator on the 26/11/2021. The operator responded with further information on the 15/12/2021.

These responses are available on our public register.

The documents submitted by the operator which now form part of the operating techniques that the operator must implement are specified in table S1.2 in the environmental permit. These include:

- Documents received in response to the Regulation 61 Notice including sections 1, 2, 3.1, 3.2, 5, 6 of the response letter dated 10/08/2021 and all parts of the Annex 1 of the Regulation 61 Notice response.
- 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.

Responses to questions 7, 8 and 9 of the RFI were excluded because the operator failed to confirm that the MRF building is kept closed at all times and that there is a fast-acting door that would ensure that building is closed and maintained closed without human intervention. This is relevant for emission control purposes. The operator failed to demonstrate that the building design is suitable to meet the requirements outlined in Sections 6.2 and 6.3 of the Non-

hazardous and inert waste: appropriate measures for permitted facilities. To address this shortfall, we have included Improvement Condition (IC1) in table S1.3 of the permit which requires the operator to review and provide written report on how they will meet appropriate measures and BAT14 of Waste Treatment BAT Conclusions.

We have excluded drawing reference 16060-030 because the operator specified in it that they are storing wastes outside. Storage of wastes outside of the building is not authorised in the permit. The permit specifies that all waste storage shall take place within an enclosed building.

### **Changes to the permit conditions**

Following the assessment of the information provided by the operator in response to the Regulation 61 Notice, summarised in table 1 we have made the following changes to the permit conditions:

- Conditions 2.4.1 and 2.4.2 were added to implement the Improvement Conditions detailed Table S1.3.
- Condition 3.3.2 was added to enable the Environment Agency to request updated Odour Management Plan.
- Conditions 2.5.1 – 2.5.4 were added because they are relevant for the implementation of the monitoring specified in Table S3.1.
- Conditions 4.2.2 and 4.2.3 were added because they are relevant to all installation activities.
- Table S1.1 as referenced in Condition 2.1.1 was 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 was 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 was 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 was amended by deleting the waste types that are no longer appropriate to the permitted site activities.
- Table S3.1 as referenced in Conditions 3.5.1 was amended to specify the parameter that need monitoring in the uncontaminated surface runoff.
- Table S3.2 was deleted because discharge of surface runoff to sewer is not allowed.
- Tables S4.1 – S4.4 have been added to implement the reporting requirements of the permit.

**Table 1 – Summary of our assessment of the operator’s Reg 61 response**

Appropriate measures	Compliance status	Assessment of the installation’s compliance with relevant standards (appropriate measures) and any alternative techniques proposed by the operator
BAT 1 - EMS	CC	The operator has their own EMS titled Oakleaf Recycling Limited EMS dated 2019 (updated December, 2021).
BAT 2 - Waste pre-acceptance, acceptance and tracking appropriate measures	CC	<p>Compliance with BAT 2 is detailed in the Oakleaf Recycling Limited EMS December 2021.</p> <p>Compliance with</p> <ul style="list-style-type: none"> <li>▪ Bat 2a is detailed in sections 1.39 -1.42 regarding the set up and implementation of waste characterisation and pre-acceptance procedures.</li> <li>▪ BAT 2b is detailed sections 1.40 - 1.45 regarding waste acceptance procedures.</li> <li>▪ BAT 2c is detailed sections 1.38 and 1.40 regarding the implementation of a waste tracking system and inventory.</li> <li>▪ BAT 2d is detailed section 1.69 regarding output quality management systems.</li> <li>▪ BAT 2e is detailed sections 1.44 and 1.58 regarding the segregation of waste.</li> <li>▪ BAT 2f is detailed in sections 1.44 and 1.134 regarding waste compatibility with existing waste.</li> <li>▪ BAT 2g is detailed in sections 1.52-1.60 and sections 1.44 and 1.45 regarding the sorting techniques for incoming waste.</li> </ul>
BAT 3 - Inventory of wastewater and waste gas streams	N/A	<p>The operator indicated that this BAT conclusion is not relevant as MRF installation accepts dry, non-hazardous waste for mechanical treatment/sorting/recovery only.</p> <p>There are no channelled emissions to air, water, or sewer at the site.</p> <p>The operator is only permitted to discharge uncontaminated water from area of the site that is not being used for waste management operations.</p>
BAT 4 - Storage procedures	CC	<p>Compliance with BAT 4 is detailed in the Oakleaf Recycling Limited EMS dated December 2021. Compliance with BAT 4a as shown in section 1.61 regarding storage location. Compliance with BAT 4b as shown in section 1.21 regarding storage capacity and residence time. Compliance with BAT 4c as shown in sections 1.61-1.72 regarding secure storage.</p> <p>Prior to this review, the permit contains a restriction which prohibit the operator from storing waste outside. We have maintained this restriction in this variation. Drawing reference 16060-030 submitted in response to the RFI suggest that waste is being stored outside. We excluded this drawing from the list of documents in Table S1.2 of the permit because it is in conflict with the permit condition and details provided in Section 1.132 of the Oakleaf Recycling Limited EMS dated</p>

		December 2021 which states that <i>'All waste will be accepted, processed, and stored within the building'</i> .
BAT 5 - Handling and transfer procedures	CC	<p>Compliance with BAT 5 is detailed in Oakleaf Recycling Limited EMS dated December 2021. All incoming waste materials shall be examined visually, so far as is reasonably practicable, following deposit in the reception area. All incoming waste, so far as is reasonably practicable, will be kept separate from other waste. Wastes will not be mixed at the site until they have been confirmed and recorded for acceptance at the site.</p> <p>The facility shall only accept non-hazardous waste from municipal, commercial, and industrial, and construction and demolition sources. Pre acceptance measures will ensure that the composition of waste and EWC Codes are obtained prior to its delivery at the site. All waste will be tipped in the waste reception bay and inspected before it is mixed with other wastes for processing. Therefore, any contamination can be isolated and placed in the quarantine area, if required.</p>
BAT 6 - monitor key process parameters	NA	The installation will only accept dry, non-hazardous waste from municipal, commercial and industrial, and construction and demolition sources for processing/separation to produce a solid recovered fuel (SRF). Water and raw materials are not used in the process and wastewater is not generated as part of the process. Due to the nature of the SRF treatment process, there is no process parameter to be monitored.
Bat 7 - monitor emissions to water	NA	<p>Water is not used, and wastewater is not generated as part of the SRF treatment process, as such monitoring of emission to water is considered not applicable.</p> <p>The operator is only permitted to discharge uncontaminated water from area of the site that is not being used for waste management operations.</p>
BAT 8 - monitor channelled emissions to air	NA	There is no channelled emission to air. This permit does not allow channelled emission to air.
BAT 9 - monitor diffuse emissions of organic compounds to air	NC/IC	<p>The permit has a restriction that all waste storage and treatment activities shall take place within an enclosed building.</p> <p>The operator is committed to ensure that all emissions to air from the installation are free from visible concentrations of dusts, fibres or particulates that are likely to cause pollution of the environment, harm to human health and serious determinant to the amenity of the locality outside the site boundary.</p> <p>The operator indicated that the building doors will remain closed only during the night-time operations. We disagree with this proposal and have included Improvement Condition 1 in table S1.3 of the permit which requires the operator 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, ensuring that there are measures and</p>

		procedures that are in place in the buildings to prevent and/or reduce fugitive emissions of dust, odour and noise.
BAT 10 - monitor odour	NC/IC	Although the operator has an Odour Management Plan, we have added Improvement Condition 2 in table S1.3 of the permit which requires the operator to submit an updated odour management plan to the Environment Agency for written approval. This is because the Environment Agency has recently received a number of odour complaints from local residents which suggest that odour that is originating from the site might be at a level that is likely to cause pollution as such there is a need for the operator to review and update the OMP and consider abatement systems for odour emission control.
BAT 11 - monitor consumption of water, energy and raw materials, and generation of residues and waste water	NC/IC	The operator suggested that monitoring of water/energy consumption is not applicable because the treatment process is dry and do not require the addition of water; however, it is required that all installations should monitor their water and energy use. Accordingly, we have added Conditions 4.2.2 and 4.2.3.
BAT 12 - odour management plan	NC/IC	Although the operator has an Odour Management Plan, we have added Improvement Condition 2 in table S1.3 of the permit which requires the operator to submit an updated odour management plan to the Environment Agency for written approval. This is because the Environment Agency has recently received a number of odour complaints from local residents which suggest that odour that is originating from the site might be at a level that is likely to cause pollution as such there is a need for the operator to review and update the OMP and consider abatement systems for odour emission control.
BAT 13 - reduce odour emissions	NC/IC	Although the operator has an Odour Management Plan, we have added Improvement Condition 2 in table S1.3 of the permit which requires the operator to submit an updated odour management plan to the Environment Agency for written approval. This is because the Environment Agency has recently received a number of odour complaints from local residents which suggest that odour that is originating from the site might be at a level that is likely to cause pollution as such there is a need for the operator to review and update the OMP and consider abatement systems for odour emission control.
BAT 14 - reduce diffuse emissions to air	NC/IC	<p>The operator is committed to ensure that all emissions to air from the installation are free from visible concentrations of dusts, fibres or particulates that are likely to cause pollution of the environment, harm to human health and serious determinant to the amenity of the locality outside the site boundary.</p> <p>The operator indicated that the building doors will remain closed only during the night-time operations. We disagree with this proposal and have included Improvement Condition 1 in the table S1.3 of permit which requires the operator 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, ensuring that there are measures and</p>



		procedures that are in place in the buildings to prevent and/or reduce fugitive emissions of dust, odour and noise.
BAT 15 - minimise use of flaring	NA	Given the nature of the waste treatment operations, we agreed that this BAT is not applicable.
BAT 16 - reduce emissions to air from flares	NA	Given the nature of the waste treatment operations, we agreed that this BAT is not applicable.
BAT 17 - noise and vibration management plan	CC	Based on our internal noise screening, both noise impact assessment and management plan are required; however, given the location of the site in relation to other noise emitting activities and the fact that we have not received noise complaint against the site we have considered that noise impact assessment and management plan are not required at this point.
BAT18 - reduce noise and vibration emissions	CC	Based on our internal noise screening, both noise impact assessment and management plan are required; however, given the location of the site in relation to other noise emitting activities and the fact that we have not received noise complaint against the site we have considered that noise impact assessment and management plan are not required at this point.
BAT 19 - optimise water consumption, reduce waste water and prevent or reduce emissions to soil and water	NA	Water is not used and wastewater is not generated as part of the SRF treatment process. The operator is only permitted to discharge uncontaminated water from area of the site that is not being used for waste management operations. Discharge of wastewater or contaminated water to sewer or surface water is not authorised in this permit.
BAT 20 - waste water treatment	NA	Water is not used and wastewater is not generated as part of the SRF treatment process. There is therefore no need for waste water treatment.
BAT 21 - prevent or limit the environmental consequences of accidents and incidents	CC	Compliance with BAT 21 is detailed in the Oakleaf Recycling Limited EMS dated December 2021. Compliance with BAT 21a is detailed in sections 1.77-1.79, 1.138, 1.143, and 1.144 regarding site protection measures. Compliance with BAT 21b is detailed in sections 1.73 and 1.136 regarding management of incidental/accidental emissions. Compliance with BAT 21c as shown in sections 1.73, 1.91, 1.102, 1.157, and 1.159 regarding incident/accident registration and assessment systems.
BAT 22 - substitute materials with waste	NA	Given the nature of the waste treatment operations, we agreed that this BAT is not applicable.
BAT 23 - Energy efficiency plan, energy balance record	CC	EMS should include the provision of annual electricity consumption against the amount of waste processed in tonnes. Recording of both incoming and exported wastes is documented in section 1.153 of the Oakleaf Recycling Limited EMS dated December 2021.

BAT 24 - maximise reuse of packaging	NA	Given the nature of the waste treatment operations, we agreed that this BAT is not applicable.
BAT 25 - General - Emissions to air (Techniques to reduce plus AEL for dust).	NC/IC	<p>Compliance with BAT 25 is detailed in the Oakleaf Recycling Limited EMS dated December 2021. Compliance with BAT 14d is detailed in sections 1.11, 1.26, 1.93, and 1.101 regarding utilisation of enclosed buildings. For compliance with BAT 25a, the operator stated that <i>'EMS should be updated to provide compliance with BAT25 through existing dust abatement techniques'</i>.</p> <p>The operator indicated that the building doors will remain closed only during the night-time operations. We disagree with this proposal and have included Improvement Condition 1 in table S1.3 of the permit which requires the operator 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, ensuring that there are measures and procedures that are in place in the buildings to prevent and/or reduce fugitive emissions of dust, odour and noise.</p>
BAT 26 - Metal shredders (Reduce accidents & incidents)	NA	The installation is for the mechanical processing of incoming dry, non-hazardous waste for recycling/recovery. The facility does not shred metal as a single waste stream
BAT 27 - Deflagrations (Prevent & reduce emissions from deflagrations)	NA	The installation is for the mechanical processing of incoming dry, non-hazardous waste for recycling/recovery, therefore deflagrations do not occur.
BAT 28 - Energy efficiency (Shredder feed stability)	CC	Compliance with BAT 28 is detailed in the Oakleaf Recycling Limited EMS dated December 2021 in Sections 1.52 - 1.60.
BAT 29 - WEEE containing VFCs and/or VHCs (Emissions of organic compounds to air including AELs)	NA	Given the nature of the waste treatment operations and waste types, we agreed that this BAT is not applicable.
BAT 30 - Explosions when treating WEEE (Prevent emissions due to explosions)	NA	Given the nature of the waste treatment operations and waste types, we agreed that this BAT is not applicable.
BAT 31 - Emissions to air (Techniques to reduce emissions to air including AEL)	NA	There is no channelled emission to air. This permit does not allow channelled emission to air.
BATs 33 - 53	NA	We have considered that BATs 33 -53 are not applicable to installations that are producing RDF or SRF. We consider RDF/SRF treatment as mechanical treatment.

Reg. 61 Request for Further Information (RFI)	Assessment of response received
Site Layout Plan	In response to the RFI, the operator provided site layout plan which we considered is in conflict with the permit conditions which specify that all storage and treatment activities must take place within an enclosed building. The drawing reference 16060-030 was excluded because it provides an indication that waste is being stored outside.
List of wastes review	The operator reviewed the list of wastes in the permit by removing waste types that are not well aligned to the permitted site's operations. The operator provided justification on the waste types that they want to retain. We accepted the list of waste as amended and have incorporated the amended list in this variation.
Providing further descriptions of the site operations undertaken under each of the permitted activities	The revised descriptions of the site operations for the activities are included in Sections 1.52 to 1.60 of the amended EMS document - Oakleaf Recycling Limited EMS dated December 2021. We accepted the amendments to these sections of the document.
Amend EMS document by linking it to the current version of the Non-hazardous and Inert guidance and up-to-date version of the management plans	The revised EMS document includes amendments detailed in to Sections 1.3, 1.22, 1.43, 1.52, 1.61 and 1.66 of the Oakleaf Recycling Limited EMS dated December 2021. We consider these changes to be acceptable.
Amend the EMS document by clearly specifying the site's operating hours	The amendment is detailed in Sections 1.15 and 1.16 of the amended EMS document - Oakleaf Recycling Limited EMS dated December 2021. We consider these changes to be acceptable.
Confirm the exact daily throughput of the site operations	Amended information of the site's daily throughput is detailed in Section 1.17 and 1.18 of the amended EMS document - Oakleaf Recycling Limited EMS dated December 2021. We consider these changes to be acceptable.
Confirm that MRF building is kept closed at all times	<p>The operator confirmed that the MRF building doors will be opened during the day and closed in the evening and during operations at night.</p> <p>We consider that this response not acceptable and have Improvement Condition 1 in the permit which requires the operator 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, ensuring that there are measures and procedures that are in place in the buildings to prevent and/or reduce fugitive emissions of dust, odour and noise.</p>
Clarification on whether the building has fast-acting doors	The operator in their response stated that <i>'there is no requirement for fast-operating doors due to the location of the facility which is entirely surrounded by screen bunds between 6.0m and 8.0m. The closest residential home is also located approximately 100m away from the facility being separated by a vegetative bund'</i> .

	<p>We considered that this response not acceptable. It is not sufficient to rely on natural barrier alone for environmental protection. Given that we have received a number of odour complaints against the site from local residents, we have decided that it is important for the operator to implement appropriate measures for emission control and prevention detailed in Sections 6.2 and 6.3 of the Non-hazardous and inert waste: appropriate measures for permitted facilities.</p> <p>We have included Improvement Condition 1 in the permit which requires the operator 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, ensuring that there are measures and procedures that are in place in the buildings to prevent and/or reduce fugitive emissions of dust, odour and noise.</p>
<p>Review your building design and confirm that it is suitable to meet the requirements outlined in Sections 6.2 and 6.3 of the Non-hazardous and inert waste: appropriate measures for permitted facilities</p>	<p>The operator addressed this request by referring to the revised EMS document - Oakleaf Recycling Limited EMS dated December 2021. However, there is no details in the revised EMS that specifically demonstrate how the operator is meeting the requirements of Sections 6.2 and 6.3 of the Non-hazardous and inert waste: appropriate measures for permitted facilities.</p> <p>We consider that this response not acceptable and have included Improvement Condition 1 in the permit which requires the operator 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, ensuring that there are measures and procedures that are in place in the buildings to prevent and/or reduce fugitive emissions of dust, odour and noise.</p>
<p>Information on the nature and quantity of contaminated runoff/wastewater that is being discharged to the sewer</p>	<p>The operator confirmed that <i>'there will be no runoff/wastewater from the facility as only dry wastes will be accepted for the production of high grade SRF via dry processing, therefore, no effluent is produced from the dry process. Due to this there is no sealed drainage system within the process building. The only source of foul discharge will be from the welfare facilities and office for which a dedicated foul drainage system exists'</i>.</p> <p>We consider this response as acceptable and have deleted Table S3.2 of the permit to show that there is no discharge to sewer from the site.</p>
<p>Information on the quantity of wastes that is being storing at any one time for both the incoming and outgoing wastes</p>	<p>The requested information is detained in Tables 1.3 and 1.4 of the amended EMS document - Oakleaf Recycling Limited EMS dated December 2021. We considered this as acceptable.</p>
<p>Request to delete the maximum storage capacity in Table 1.4 of the EMS document (Oak leaf Recycling Limited EMS 2019) regarding quarantine wastes</p>	<p>Given that the operator is not authorised intentionally to receive and/or store quarantine wastes, the operator was asked to delete the throughput in this table.</p> <p>The operator amended this in response to the RFI. The changes are detailed in Table 1.5 of the amended EMS document - Oakleaf Recycling Limited EMS dated December 2021.</p>
<p><b>Summary of other changes made to the permit as a result of our assessment of the Reg. 61 response</b></p>	
<p><b>Change</b></p>	<p><b>Reason for change</b></p>

Conditions 2.4.1 and 2.4.2 have been added to the permit	These conditions are relevant conditions that would enable the Environment Agency to enforce the Improvement Conditions detailed in Table S1.3 of the permit.
Condition 3.3.2 has been added to the permit	This condition is a standard condition that is included in the permit where there is a need for the Environment Agency to request to an updated Odour Management Plan (OMP). Recently, the Environment Agency has received a number of odour complaints from local residents which suggest that odour that is originating from the site might be at a level that is likely to cause pollution as such there is a need for the operator to review and update the OMP and the abatement systems for odour emission control.
Conditions 2.5.1 – 2.5.4 have been added to the permit	These conditions are relevant to all installations where monitoring is required. They were 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 to the permit	These conditions are relevant performance and reporting conditions that are applicable to all installations. They are missing in the existing permit and need to be added since we are updating the permit.
Table S1.1 as referenced in Condition 2.1.1 has been amended	The amendments were made to clearly define the permitted activities 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	The amendments were made to incorporate operating techniques documents received from the operator in response to the Regulation 61 Notice and additional information received in response to the request for further information.
Table S1.3 as referenced in Conditions 2.4.1 and 2.4.2 has been added to the permit	The table was added to incorporate improvement conditions that require the operator to undertake a review of the building and treatment equipment at the site and to submit of a revised Odour Management Plan.
Table S2.2 as referenced in Conditions 2.3.4 was amended	The amendment was to streamline the waste types that are received at the site. The operator submitted amended list of waste by deleting the waste types that are no longer appropriate to the permitted site activities. The revised list of waste was provided by the operator in response to the request for further information date 26/11/2021 (response receive date – 15/12/2021)
Table S3.1 as referenced in Conditions 3.5.1 was amended	The amendment was to identify the parameter that needs monitoring in the uncontaminated surface runoff and to specify the monitoring frequency.
Table S3.2 was deleted	This table was deleted because the operator indicated that they are not discharging and do not have the intention of discharging surface runoff to sewer.
Tables S4.1 – S4.4 have been added	These tables were added to implement the reporting requirements of the permit as specified under conditions 4.2.2 and 4.2.3.