

## Permitting Decisions- Environment Agency Initiated Variation

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We have issued an Environment Agency initiated variation for Sutton Courtenay Materials Recycling Facility operated by FCC Environment (UK) 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/NP3890VV/V005.

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 and 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 30/11/2021 and received their response on the 21/12/2021.

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 they are specified in table S1.2 in the environmental permit. These include:

- Documents received in response to the Regulation 61 Notice including the response letter, site plan titled 'Plan 1', drawing number 427A531, dated 02.09.21 and all parts of the Annex 1 of the Regulation 61 Notice.
- Document received in response to questions 1 to 6 of the Request for Further Information, including all parts of the document titled '*SC MRF Appropriate measures 6.2 6.3*'.

### **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:

- Condition 2.1.2 has been added to specify that waste received under the installation activity need to be kept separate from other wastes.
- Condition 2.3.3 has been amended to include the new list of waste table (Table S2.2) that was derived from the split of Table S2.1 in two (one for the Installation/RDF production activity and one for the Waste Operation/MRF activity). The follow-on table has been renumbered as Table S2.3.
- Condition 3.3.2 has been deleted as the site has an approved Odour Management Plan.
- Condition 3.5.1 has been amended to replace the point source emission to sewer with the process monitoring of the dust abatement units on the two shredders.
- Conditions 3.5.3 and 3.5.4 have been deleted because there is no longer need for emission monitoring of discharge to sewer.
- Condition 3.6.2 has been deleted as the site has an approved Pest Management Plan.
- Condition 3.7.2 has been deleted as the site has an approved Fire Prevention Plan.
- Condition 4.3.2 has been added because it is a relevant condition for the waste operation activities.
- Condition 4.3.3 has been amended to incorporate the notification requirements specified in condition 4.3.2.
- Condition 4.4.2 has been amended by adding the texts “without delay”.
- Table S1.1 as referenced in Conditions 2.1.1 and 2.1.2 has been amended to clearly define the activities that are undertaken at the site and to apply relevant limits to them. The activities were renumbered as a result.
- 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 and additional information received in response to the RFI.
- Table S1.3 as referenced in Condition 2.4.1 has been amended to remove need for monitoring of site effluent discharge to sewer as the operator opted not to discharge to sewer.
- Table S2.1 as referenced in Condition 2.3.3 has been split into two tables (tables S2.1 and S2.2) to clearly identify wastes that are received under the RDF production activity from those that are received under the material recovery activity. Some of the waste types that are not appropriate to the permitted activities have been removed. The requirement to accept food waste was also removed - the operator agreed that food waste related codes should be removed.

- Table S3.1 as referenced previously in Condition 3.5.1 (emission to sewer table) has been replaced with the process monitoring table.
- Table S4.1 has been amended by adding the reporting requirements for process monitoring to the table.
- Tables S4.2 – S4.4 have been added to implement the reporting requirements of the permit.
- Schedule 6 as referenced in condition 4.4.1 has been amended to add additional interpretation relevant to the changes made to the permit.

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

<b>Appropriate measures</b>	<b>Compliance status</b>	<b>Assessment of the installation’s compliance with relevant standards (appropriate measures) and any alternative techniques proposed by the operator</b>
BAT 1 - EMS	CC	The operator has ISO14001 Management System in place at the site and across their business.
BAT 2 - Waste pre-acceptance, acceptance and tracking appropriate measures	CC	The operator confirmed that they have waste acceptance procedures including electronic weighbridge system in place at the site.
BAT 3 - Inventory of wastewater and waste gas streams	N/A	The operator indicated that this BAT conclusion is not relevant because the installation is a dry process - no waste waters or waste gas streams are generated during the operations Again, there are no channelled emissions to air, water, or sewer from the site.
BAT 4 - Storage procedures	CC	All operations including storage of waste are within a building. There are limited options for storage of baled and wrapped RDF and processed segregated metals to be stored outside but this is subject to written approval by the Environment Agency in accordance with pre-operational condition 1 that is specified in table S1.3 of the permit.
BAT 5 - Handling and transfer procedures	CC	The operator confirmed that they have handling and transfer procedures in place. Waste received at the site is tipped directly into waste bays and is either bulked up or loaded into articulated lorries for onward transfer to Energy from Waste (EfW) facilities or Landfill. For the Material Recovery Facility (MRF) - waste is fed into a hopper and into the MRF processing machinery, pre-sort and picking cabins in place to remove unsuitable wastes before baling and movement to the storage area. RDF feedstocks are shredded, baled, and wrapped with in film. Both the MRF and RDF machinery is currently mothballed but are ready to be utilised with change of contract. We have added pre-operational condition 2 in the permit which requires the operator to notify Environment Agency in writing prior to the recommencing of the activities, stating the date when the activities will re-commenced.
BAT 6 - monitor key process parameters	NA	The installation will only accept dry, non-hazardous waste for processing/separation to produce a Refuse Derived Fuel (RDF). No waste waters are generated during the operations. Due to the nature of the RDF treatment process, there is no process parameter to be monitored.
Bat 7 - monitor emissions to water	NA	Water is not used, and wastewater is not generated as part of the RDF treatment process, as such monitoring of emission to water is considered not applicable.
BAT 8 - monitor channelled emissions to air	NA	There is no channelled emission to air. The permit does not allow channelled emission to air. There are air extraction units (bag plants) that are connected to the shredders that are used for both the MRF and the RDF production process. These air extraction units extract dust from the shredders;

		the extracted dust is captured within the bag filters and the dropout drum. The filtered air from the bag plants on these 2 shredders is released inside the building. To ensure efficient operation of the bag plants, we have included pre-operational condition 3 in the permit which requires continuous monitoring of the pressure differential within the bag plants. This is to ensure the filters are maintained and replaced to ensure the bag plants operate correctly and that the release of dust is below 5mg/m <sup>3</sup> .
BAT 9 - monitor diffuse emissions of organic compounds to air	NA	Process does not involve regeneration of spent solvents, the decontamination of equipment containing POPs with solvents, and the physico-chemical treatment of solvents for the recovery of their calorific value. This BAT is therefore considered not applicable.
BAT 10 - monitor odour	CC	The operator has an approved Odour Management Plan - Odour Management Plan May 2017 Report No 10129-R03 (Odour monitoring & Control Document - EMS-3.13.10-SCTS). Odour checks are completed daily at the site boundary and recorded on the daily Installation check.
BAT 11 - monitor consumption of water, energy and raw materials, and generation of residues and wastewater	CC	Permit condition is in place which requires the operator to submit end of year report for water, energy and raw materials usage.
BAT 12 - odour management plan	CC	The operator has an approved Odour Management Plan - Odour Management Plan May 2017 Report No 10129-R03 (Odour monitoring & Control Document - EMS-3.13.10-SCTS). Odour checks are completed daily at the site boundary and recorded on the daily Installation check.
BAT 13 - reduce odour emissions	CC	The operator has an approved Odour Management Plan - Odour Management Plan May 2017 Report No 10129-R03 (Odour monitoring & Control Document - EMS-3.13.10-SCTS). Odour checks are completed daily at the site boundary and recorded on the daily Installation check. Again, all treatment and most storage activities are happening within an enclosed building.
BAT 14 - reduce diffuse emissions to air	CC	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.  All waste treatment activities are carried out inside a building. There are air extraction units within the building that extract dust from the shredders associated with the RDF and MRF processes. The extracted dust is captured within the bag filters and the dropout drum. The filtered air from the bag plants on the 2 shredders is released inside the building. To ensure efficient operation of the bag plants, we have included pre-operational condition 3 in the permit which requires continuous monitoring of the pressure differential within the bag plants. This is to ensure the filters are



		maintained and replaced to ensure the bag plants operate correctly and that the release of dust is below 5mg/m <sup>3</sup> .
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 not required. We have not received noise complaint against the site, as such we have considered that the site is not considered to be a source of noise or vibration emissions and that noise management plan is not required. However, the operator has Noise & Vibration Control document EMS-3.13.14-SCTS in place at the site for noise prevention and control.
BAT18 - reduce noise and vibration emissions	CC	Based on our internal noise screening, both noise impact assessment and management plan are not required. We have not received noise complaint against the site, as such we have considered that the site is not considered to be a source of noise or vibration emissions and that noise management plan is not required. However, the operator has Noise & Vibration Control document EMS-3.13.14-SCTS in place at the site for noise prevention and control.
BAT 19 - optimise water consumption, reduce wastewater and prevent or reduce emissions to soil and water	NA	Water is not used and wastewater is not generated as part of the RDF treatment process.
BAT 20 - waste water treatment	NA	Installation is a dry process - no waste waters are generated as part of the operations.
BAT 21 - prevent or limit the environmental consequences of accidents and incidents	CC	The operator has ISO14001 Management System in place at the site and across the business, along with supporting documents including Emergency Management Plan, Fire prevention Plan, Environmental Aspects & Impacts register, company-wide reporting system
BAT 22 - substitute materials with waste	NA	There is limited use of raw materials within the waste sorting process. 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	The operator has ISO50001 Management System in place at the site and across the business – this includes energy reduction targets, data reporting system for each site and each site has an Energy Management Plan.
BAT 24 - maximise reuse of packaging	NA	No packaging is generated during the waste process operations. 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).	CC	<p>All of the waste treatment activities are taking place within a building to minimise diffuse air pollution. There is no channelled emission to air. The permit does not allow channelled emission to air. There are air extraction units (bag plants) that are directly connected to the shredders used in both the MRF and the RDF production process.</p> <p>The filtered air from the bag plants on these 2 shredders is released inside the building. To ensure efficient operation of the bag plants, we have included the pre-operational condition 3 in the permit which requires continuous monitoring of the pressure differential within the bag plants. This is to ensure the filters are maintained and replaced to ensure the bag plants operate correctly and to ensure the release of particulate matter is below 5mg/m<sup>3</sup>.</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 or WEEE waste so BAT 26 does not apply.
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. The facility does not shred metal or WEEE waste so BAT 27 does not apply.
BAT 28 - Energy efficiency (Shredder feed stability)	NA	<p>We accepted that this is not applicable given that it is not a large energy consuming facility (like metal recycling using hammer mills).</p> <p>However, the operator indicated that they have systems that ensures steady flow of wastes during the operation of the MRF equipment.</p>
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. No WEEE is treated onsite. WEEE is removed from waste pile when spotted. There is non-conforming waste procedure in place at the site.
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. No WEEE is treated onsite. WEEE is removed from waste pile when spotted. There is non-conforming waste procedure in place at the site.
BAT 31 - Emissions to air (Techniques to reduce emissions to air including AEL)	CC	<p>All of the waste treatment activities are taking place within a building to minimise diffuse air pollution. There is no channelled emission to air. The permit does not allow channelled emission to air. There are air extraction units (bag plants) that are directly connected to the shredders used in both the MRF and the RDF production process.</p> <p>The filtered air from the bag plants on these 2 shredders is released inside the building. To ensure efficient operation of the bag plants, we have included pre-operational condition 3 in the permit which requires continuous monitoring of the pressure differential within the bag plants. This is to ensure the filters are maintained and replaced to ensure the bag plants operate correctly and to ensure the release of particulate matter is below 5mg/m<sup>3</sup>.</p>

BAT 32 - WEEE containing mercury (Emissions to air including AEL)	NA	No WEEE is treated onsite. WEEE is removed from waste pile when spotted. There is a non-conforming waste procedure in place at the site.
BATs 33 - 53	NA	We considered that BATs 33 - 53 are not applicable to installations that are producing RDF. We consider RDF treatment as mechanical treatment.
<b>Reg. 61 Request for Further Information (RFI) Assessment of response received</b>		
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 the amended list of waste in their response to the RFI dated 21/12/2022. Although the operator requested that the following EWC codes (19 05 02, 19 05 03, 19 12 10, 19 12 12 and 20 01 99) be retained, we reached an agreement with the operator as part of the draft permit review process that these EWC codes are not appropriate to their site's operations. Together with the afore-mentioned EWC codes, the following EWC codes (15 01 07 and 20 01 08) were also removed as part of the discussion we had with the operator at the draft permit review stage. The agreed list of waste is detailed in the draft permit (version 2) that we sent to the operator on the 11/03/2022. We accepted the list of waste as amended and have incorporated the amended list in this variation.	
Amend Table S2.1 of the permit by separately identifying wastes that you are accepting under the installation activity (Activity A1) and wastes that you are accepting under the waste operation activity	Table S2.1 was split into two to clearly differentiate wastes that the site is receiving under the RDF production activity from those that are received under the material recovery activity. Some of the waste types that are not appropriate to the permitted activities have been removed. The requirement to accept food waste was also removed given that the operator agreed that the food waste related codes should be removed.	
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	The operator provided the document titled 'SC MRF Alternative measures 6.2 6.3' spreadsheet in which they provided additional information on the current building design. They stated that based on the remote location of the site and activities being carried out within the building, that they believe that current control measures are suitable to control/reduce fugitive emissions from the site. We have reviewed and accepted the additional information as provided.	
Confirm whether waste received under the RDF production activity (Activity A1 of your permit) is being sent to landfill (with or without treatment)	In response to the RFI, the operator confirmed that Activities AR1 - AR4 are non-operational and that wastes are currently not being received under these activities. They also confirmed that although this is scope for incidental waste generation (as rejects), wastes are not being received or treated for disposal. By this response we have included the restriction under AR5 activity that <i>'treatment operations subject to D9 shall be no more the 50 tonnes per day'</i> .	

Confirmation on whether Pre-operational Condition 1 has been completed	The operator confirmed that Pre-Operational Condition 1 has not been completed. The reason is because RDF bales have not been produced/stored at the site since the permit was issued. The operator also confirmed that they have not installed any connection to the sewer (because it is impossible due to location of the site). They have not also installed any sealed drainage system at the site but will install one once RDF production activity commences.
Provide information on the nature and quantity of contaminated runoff/wastewater that is being discharged (or likely to be discharged) to sewer from the waste storage area that is located outside of the building	The operator confirmed that there is no available sewer connection at the Sutton Courtenay site and they are not discharging to sewer. The indicated that an engineered solution will be installed and any contaminated run off from the storage area will be contained within a sealed drainage system, i.e., underground tank if RDF bale storage commences outside.
<b>Summary of other changes made to the permit as a result of our assessment of the Reg. 61 response</b>	
<b>Change</b>	<b>Reason for change</b>
Condition 2.1.2 has been added to the permit	This condition was added to specify that waste received under the installation activity need to be kept separate from all other wastes.
Condition 2.3.3 has been amended	The amendment was to include the new list of waste table (Table S2.2) that was derived from the split of Table S2.1 in two (one for the Installation/RDF production activity and one for the Waste Operation/MRF activity). The follow-on table has been renumbered as Table S2.3.
Condition 3.3.2 has been deleted	This condition was deleted because the site has an approved Odour Management Plan which has been incorporated in Table S1.2 of the permit. There are no reported odour issues at the site.
Conditions 3.5.1 has been amended	This condition has been amended to replace point source emission to sewer with process monitoring of the dust abatement units. There is no longer any need for emission monitoring of discharge to sewer; the operator indicated that they do not have the intention of discharging to sewer. Wastewater at the site is captured and removed offsite.
Conditions 3.5.3 and 3.5.4 have been deleted	These conditions were deleted because there is no longer need for emission monitoring of discharge to sewer. Monitoring in line with MCERTS and maintaining access to the emission sampling points are not required.
Condition 3.6.2 has been deleted	This condition was deleted because the site has an approved Pest Management Plan which has been incorporated in Table S1.2 of the permit. There are no reported pest issues at the site.
Condition 3.7.2 has been deleted	This condition was deleted because the site has an approved Fire Prevention Plan which has been incorporated in Table S1.2 of the permit. There are no reported fire issues at the site.

Condition 4.3.2 has been added	This condition is relevant for the waste operation activities but was omitted in the existing permit. We have included it to ensure that the permit is up to date.
Condition 4.3.3 has been amended	The amendment was to include the notification requirements specified in condition 4.3.2.
Condition 4.4.2 has been amended	This condition was amended by adding the texts “without delay”. These texts are relevant to the waste operation activities.
Table S1.1 has been amended	The amendments were made to clearly define the permitted activities at the site and to apply relevant limits to them. The activities were renumbered as a result.
Table S1.2 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 RFI.
Table S1.3 has been amended	The amendment was to remove need for monitoring of site effluent discharge to sewer given that the operator has confirmed that they are not discharging and do not have the intention of discharging to site’s generated effluent to sewer.
Table S2.1 has split into two tables	The table was split to clearly differentiate wastes that are received under the RDF production activity from those that are received under the material recovery activity. Some of the waste types that are not appropriate to the permitted activities were removed from the permit.
Table S3.1 has been amended	Table S3.1 as referenced previously in Condition 3.5.1 has been amended by replacing the emission to sewer table with the process monitoring table. The emission to sewer table was deleted because that operator is not discharging and do not have the intention of discharging to site’s generated effluent to sewer. We have added process monitoring of the dust abatement units on the two shredders. The purpose of this is to ensure that the efficiency of the abatement units is monitored and maintained.
Table S4.1 has been amended	This table has been amended by adding the reporting requirements for process monitoring and by removing reporting requirements for emission to sewer from the table.
Tables S4.2 – S4.4	These tables were added to implement the reporting requirements of the permit.
Schedule 6 has been amended	The amendments were made to include additional interpretations for the following: building, container, healthcare waste, impermeable surface, pollution, sealed container, sealed drainage. In addition, we have deleted the interpretation for MCERT because the relevant condition where it was used is now deleted from the permit.