

Permitting Decisions- Environment Agency Initiated Variation

We have issued an Environment Agency initiated variation for Enva Colwick Recycling and Resource Recovery Facility operated by Enva England 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/SP3490CA/V008.

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).
4. 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

Extent of this review

We have reviewed the operations that relate to the Installation activities in this permit against the relevant requirements of Best Available Techniques (BAT) Conclusions set out in implementing decision (EU) 2018/1147 of 10 August 2018. We have not considered the Waste Operation activities in full in this Permit Review. We offered the operator the opportunity for us to review the waste operations as part of this review, but they decided to limit the scope of the review to the Installation activities only.

As part of this review and to clearly define all of the regulated activities, we have separated the Waste Operation activities in Table S1.1 to make them distinctive. We have also amended the restrictions for the Waste Operation activities to ensure that they are in line with the Environmental Permitting (England and Wales) Regulations 2016 and have assigned separate waste tables (Tables S2.3 – S2.8) to each of the activities. The operator has reviewed and is happy with them.

We have agreed with the operator that the Waste Operation activities will need to be reviewed in the future as part of a waste operations permit review. They have been advised to ensure that the site infrastructure and emission control measures are adequate to mitigate risks arising from the activities and in line with the [Non-hazardous and inert waste: appropriate measures for permitted facilities](#) guidance.

Regulation 61 Response

The Regulation 61 notice response from the Operator was received on 02/09/2021.

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 the permit review assessment.

We sent a request for further information (RFI) by email to the operator on the 04/01/2022 and received their response on the 01/02/2022 and further information on the 27/05/2022, 30/06/2022, 01/07/2022, 07/07/2022 and 08/07/2022.

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 documents titled 'Regulation 61 Notice Response', reference 416.12111.00007, dated September 2021; 'Environmental Management System', version 4, dated December 2014; response to Annex 1 of the Regulation 61 Notice (version 2) and the drainage drawing 3725.21C (drawing numbers 1-4).
- Document received in response to questions 1 to 6 and 8 to 11 of the RFI, including documents titled:
 - '416.12111.00002_Colwick_Drainage_SRF_Production_Area';
 - '416.12111.00002_Colwick_Drainge_Plan_Wider_site';
 - '416_12111.00002_Colwick_EWC_allocated_by_area';
 - '416.12111.00002_Colwick_Process_Overview';
 - excluding responses to questions 7 and 12 of the RFI and the documents titled 'Colwick_Reg_61_EA_Queries_Question_7_Response_final'.
- Document titled 'Enva Colwick SRF EWC codes review and comments 26th May 2022'.
- Email containing response to the RFI dated 14/06/2022, including information on wastewater management procedures and details of air emission controls within the SRF building received on the 30/06/2022.
- Email and site layout plan that shows the locations of the containment bays and external treatment and storage associated with the SRF process received on the 01/07/2022.
- Email that provides detail on the nature of the waste that is storage in the containment bays and the storage time scale for the waste types received on the 07/07/2022.
- Drawings titled 'Installation Containment Bays – metal and fines' and 'Installation containment bay drainage' that show respectively the location of the containment bays and the associated drainage infrastructure/routes for the SRF treatment and storage areas received on the 08/07/2022.
- Document titled 'the Installation Activity for the Production of SRF' received on the 08/07/2022.
- Document titled 'NIHOT User Manual' received on the 13/07/2022 that provides information on the monitoring, cleaning and maintenance procedures for the filter unit attached to the density separator.

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 2.3.5 has been amended to include new list of waste tables - tables S2.3 – S2.8 (derived from Table S2.2). Table S2.2 was split to clearly separate wastes received under the installation activity (Activities AR1 and AR2 of Table S1.1) from those received under the waste operations activities (Waste Transfer and Treatment Facility including RDF production, Metal, Wood, Gypsum, Aggregate, Material Recycling Facility for Dry Mixed Recyclables activities).
- Conditions 2.7.1 and 2.7.2 have been added to implement the new Improvement Conditions (IP1 – IP5) detailed in Table S1.6.
- Condition 4.3.2 has been amended to remove reference to conditions 4.3.1(a)(i) and 4.3.1(b)(ii).
- Conditions 4.3.3 and 4.4.3 have been amended to include reference to all the waste operation activities - Activities AR7 to AR12. The waste operation activities were derived by splitting Activity A7 of the last permit variation into six separate waste operation activities (Waste Transfer and Treatment Facility including RDF production, Metal, Wood, Gypsum, Aggregate, Material Recycling Facility for Dry Mixed Recyclables 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. This was done to provide clarity on the range of installation and waste operation activities at the site and to ensure that appropriate limits are applied to each activity.
- Table S1.2 as referenced in Conditions 2.3.1 and 2.3.2 has been amended to incorporate operating techniques documents received in response to the Regulation 61 Notice and the RFI.
- Table S1.6 as referenced in Conditions 2.7.1 and 2.7.2 has been added to incorporate a new Improvement Conditions:
 - IP1 – IP2 which require the operator to review the design of the SRF building and the containment bays for storage of SRF residues and treatment equipment for SRF production process;
 - IP3 which requires the operator to submit updated EMS and
 - IP4 - IP5 which require the operator to survey the drainage infrastructure at the site and submit an updated drainage drawing to the Environment Agency for approval.
- Table S2.2 as referenced in Condition 2.3.5 has been amended by removing waste codes that are not appropriate for the installation activity and restricting some of the waste codes to combustible waste only.
- Tables S2.3 – S2.8 as referenced in Condition 2.3.5 have been added to clearly specify waste types and quantities that are received under the

Waste Operations activities (Waste Transfer and Treatment Facility including RDF production, Metal, Wood, Gypsum, Aggregate, Material Recycling Facility for Dry Mixed Recyclables activities).

- Table S3.2 as referenced in Condition 3.5.1(b) has been amended to include process monitoring of pressure difference in the filter unit that is serving the NHOT Air Density Separator and SRF production process.
- Schedule 5 as referenced in conditions 4.3.2 and 4.3.4 has been amended by adding a new paragraph (c) to Part A requiring notification of breach of permit conditions not relating to limits.
- 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

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	FC	<p>The operator has their own Management System at the site. We do not agree with the operator’s proposition that the site does not need an odour management plan, a noise and vibration management plan, wastewater and waste gas stream inventories.</p> <p>Although we have considered that we do not need to ask the operator to provide an odour management plan or a noise and vibration management plan at this point, we will ask for these if future operations of the site are such that they become necessary.</p> <p>The site EMS document is being updated to reflect the current condition of the site. We have added Improvement Condition IP3 which requires the operator to submit an updated EMS to the Environment Agency for approval.</p>
BAT 2 - Waste pre-acceptance, acceptance and tracking appropriate measures	CC	<p>The operator confirmed that they have a ‘Procedure for the acceptance of incoming waste’ in place at the site, including electronic weighbridge system.</p>
BAT 3 - Inventory of wastewater and waste gas streams	N/A	<p>The operator indicated that this BAT conclusion is not relevant because the installation is a dry process and there are currently no emissions of wastewater or waste gas streams originating from the waste treatment processes associated with the Installation activities.</p> <p>We have added a restriction to the permit that states that ‘there shall be no discharge of wastewater from the containment bays and external storage areas to surface waters or soakaways’.</p> <p>Wastewaters from the external waste storage areas and containment bays are collected and diverted to the sealed storage tank before being tanked offsite for treatment at a suitably licensed treatment facility.</p>
BAT 4 - Storage procedures	CC	<p>Enva’s EMS details all storage arrangements for waste on site, and mitigation techniques employed in each area to reduce risk to the environment associated with the storage of waste. The site EMS document is being updated to reflect the current condition of the site.</p>
BAT 5 - Handling and transfer procedures	CC	<p>Each area of the site has differing handling and transfer procedures depending on the type of waste stored and processed in that area. The EMS provides specific details of waste handling and transfer procedures for each of the six areas on site, including schematic diagrams detailing processes within each area.</p> <p>Vehicles entering the site are required to bring documentation of the waste delivery. The weighbridge operator follows waste acceptance procedures outlined within the site EMS and waste acceptance procedures, to record incoming waste and ensure waste types conform to the</p>

		<p>description in the documentation supplied by the producer and holder. Documentation of where each waste delivery is deposited on site, and when each waste despatch leaves site are made and stored on site.</p> <p>Measures are taken on site to prevent, detect and mitigate against potential spills. Wastes that are either in liquid or sludge form are not accepted on site.</p> <p>Some dusty/powder wastes are accepted to site into the plasterboard processing area. This material is only processed within the building under controlled conditions to ensure there are no dust emissions. The dusty/powder materials are only delivered to site fully contained in bags or other enclosed packaging/containers. A comprehensive dust suppression system is fitted throughout the site which periodically mists the enclosed areas to ensure dust is reduced.</p>
BAT 6 - monitor key process parameters	NA	<p>The operator confirmed that no wastewaters are generated as part of the installation/SRF production activities and as such they stated that there is no need to monitor key process parameters associated with wastewater handling/treatment.</p> <p>We have added a restriction to the permit that states that 'there shall be no discharge of wastewater from the containment bays and external storage areas to surface waters or soakaways'.</p> <p>Wastewaters from the external waste storage areas and containment bays are collected and diverted to the sealed storage tank before being tanked offsite for treatment at a suitably licensed treatment facility.</p>
Bat 7 - monitor emissions to water	NA	<p>The operator confirmed that no wastewaters are generated as part of the installation/SRF production activities, as such, they stated that monitoring of emission to water is not applicable.</p> <p>We have added a restriction to the permit that states that 'there shall be no discharge of wastewater from the containment bays and external storage areas to surface waters or soakaways'.</p> <p>Wastewaters from the external waste storage areas and containment bays are collected and diverted to the sealed storage tank before being tanked offsite for treatment at a suitably licensed treatment facility.</p>
BAT 8 - monitor channelled emissions to air	NA	<p>There is no channelled emission to air. This permit does not allow channelled emission to air from the installation activities.</p>
BAT 9 - monitor diffuse emissions of organic compounds to air	NA	<p>The activities at the site do not involve regeneration of spent solvents, the decontamination of equipment containing POPs with solvents or the physico-chemical treatment of solvents for the recovery of their calorific value. This BAT is therefore considered not applicable.</p>
BAT 10 - monitor odour	FC	<p>The operator stated that the site does not currently have a dedicated Odour Management Plan (OMP) or document which specifies an odour monitoring scheme. Although we do not currently have concerns with regards to odour for the installation activity and the site's EMS document contains details of procedures for monitoring of odour emissions at the site which include olfactory</p>

		monitoring of odour emissions at least twice a day, we may still require the operator to submit a site-specific Odour Management Plan in the future.
BAT 11 - monitor consumption of water, energy and raw materials, and generation of residues and wastewater	CC	<p>Consumption of mains water, energy, raw materials as well as the generation of residues and wastewater are monitored at the site on an at least annual basis. Water and electricity use are metered at the site and are therefore continuously monitored. Records of fuel consumption for vehicles and plant are maintained. Records of residues and wastewater are recorded via the weighbridge and waste transfer note records.</p> <p>There is a condition in the permit which requires the operator to submit a report each year for water, energy and raw materials usage.</p>
BAT 12 - odour management plan	FC	The operator stated that the site does not currently have a dedicated Odour Management Plan (OMP) or document which specifies an odour monitoring scheme. Although we do not currently have concerns with regards to odour for the installation activity and the site's EMS document contains details of procedures for monitoring and control of odour emissions at the site, we may still require the operator to submit a site-specific Odour Management Plan in the future.
BAT 13 - reduce odour emissions	FC/CC	<p>The operator stated that the site does not currently have a dedicated Odour Management Plan (OMP) or document which specifies an odour monitoring scheme. Although we do not currently have concerns with regards to odour for the installation activity and the site's EMS document contains details of procedures for monitoring and control of odour emissions at the site, we may still require the operator to submit a site-specific Odour Management Plan in the future.</p> <p>The EMS document specifies odour management techniques employed across the general site, to reduce diffuse odour emissions. Due to the nature of the site operations, the techniques employed focus around minimising residency times of waste on site. Management techniques used include:</p> <ul style="list-style-type: none"> ▪ Putrescible waste is moved off site on a regular basis; ▪ Green waste is removed at regular intervals prior to odour forming; ▪ Food waste is moved off site as a priority to reduce potential effects of odour; ▪ Wood materials are removed from the site on a regular basis to reduce the risk of materials biodegrading; ▪ The sealed collection tanks, silt traps and by-pass interceptors are regularly maintained to prevent the build-up of materials that could cause odour.
BAT 14 - reduce diffuse emissions to air	NC/IC	<p>The EMS document for the site, specifies management techniques employed across the general site, and specifically, within Area 2, where the installation is located, to reduce diffuse emissions to air. These include:</p> <ul style="list-style-type: none"> ▪ Drivers are instructed and monitored to ensure discharge heights from any loading operation are kept as low as possible. ▪ The site has a speed limit of 5 mph for all vehicles.

		<ul style="list-style-type: none"> ▪ All gypsum wastes are tipped within an enclosed building to reduce the potential of generating diffuse emissions. ▪ The majority of the mechanical and manual sorting of wastes on site are conducted within Area 2 building where the installation is located, to reduce potential for diffuse emissions. ▪ Bay areas for storage of wastes are located within Area 2 building, located inside to reduce diffuse emissions to air. ▪ Area 2 benefits from a NHOT Air Density Separator, which is an air separation unit associated with the SRF production process. This unit separates dust particles from the process using filter socks, whilst air is then returned to the process. The dust is collected into bins beneath the filter socks, and these are periodically removed by cleaning operatives and combined back with the finished product. Although there is no channelled emission to air associated with this unit, we have included process monitoring of the unit in Table S3.2 of the permit to ensure that efficiency of the unit is maintained, and that dust and particulate emissions are below 5mg/m³. ▪ Numerous areas of the site benefit from dust suppression systems, including atomized fan misting system within the recycling reception building; a mist air dust suppression system, within the roof of 'Area 2' building; sprinklers are fitted at strategic locations around the site to control dust generated by vehicle movements and on-site operations – these involve the use of rain gun valves fitted within pipework around the site. ▪ Dust suppression systems on site are automated and activate periodically on a timer throughout the day. ▪ All site vehicles are fitted with silenced exhausts, venting upwards, to reduce dust emissions. ▪ All dust suppression systems on site fall under the maintenance schedule for plant on site. Any maintenance and/or repairs necessary to maintain the efficiency of the dust suppression equipment will be carried out as soon as is reasonably practicable. ▪ All areas of the site including vehicles and equipment are maintained in a clean condition using the site loading plant and sweeping equipment. ▪ A road sweeper attends site on a regular basis (at least twice a week). The sweeper keeps the site clean by sweeping the on-site roads as well as the access road, Private Road No. 4, to remove any dust/debris present and to clean the gully pots. ▪ There are external storage/containment bays which are either roofed or under cover. <p>We have considered that the existing building and containment bays for the storage and treatment of SRF and the SRF processing equipment do not meet the requirements set out in BATs 14 and 19 of the Waste Treatment BAT Conclusions or the requirements of the Non-hazardous and inert waste: appropriate measures for permitted facilities guidance.</p> <p>We have added Improvement Conditions (IP1 and IP2) to the permit which require the operator to review the design of the SRF building, containment bays for storage of SRF residues and treatment equipment for SRF production process to ensure that they are in line with the provisions of the Non-</p>
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		hazardous and inert waste: appropriate measures for permitted facilities and BATs 14 and 19 of the Waste Treatment BAT Conclusions .
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	<p>The operator indicated that the site does not currently have a dedicated Noise Management Plan (NMP) and does not have a history of causing noise nuisance. The closest sensitive receptor to the site is a residential property located 430m to the south of the site.</p> <p>Based on our internal noise screening, both noise impact assessment and management plan are not required. We have not received noise complaints against the site, and as such, we have decided that a noise impact assessment and noise management plan are not required.</p> <p>The operator is committed to submit in the future, a dedicated Noise Management Plan if noise is giving rise to pollution outside the site boundary.</p>
BAT18 - reduce noise and vibration emissions	CC	<p>Based on our internal noise screening, both noise impact assessment and management plan are not required. We have not received noise complaints against the site, and as such, we have decided that a noise impact assessment and noise management plan are not required.</p> <p>Noise is controlled through the use of effectively silenced plant. All on site mobile plant and machinery complies with current legislative requirements and all company delivery and collection vehicles are similarly equipped.</p> <p>Operations that generate higher noise are carried out behind stockpiles, sound attenuation walls or undercover as necessary.</p> <p>Cowlings are used on site to help to reduce any noise generated by the processing plant; The processing plant and the site loading shovel are fitted with effective silencers where available; The Area 2 Plant, Stretch Deck Plant and Trommel have acoustic enclosures to reduce noise and vibration. The noise suppression equipment on these machines is maintained and included in the maintenance schedule for the site.</p> <p>The operator is committed to submit in the future, a dedicated Noise Management Plan if noise is giving rise to pollution outside the site boundary.</p>
BAT 19 - optimise water consumption, reduce wastewater and prevent or reduce emissions to soil and water	NC/IC	<p>Water is not used in the installation operations and wastewater is not generated as part of the SRF treatment processes.</p> <p>There are external storage/containment bays which are either roofed or under cover. Wastewaters from the external waste storage areas and containment bays are collected and diverted to the sealed storage tank before being tanked offsite for treatment at a suitably licensed treatment facility.</p>

		<p>We have considered that the external storage areas and containment bays do not meet the requirements set out in BATs 14 and 19 of the Waste Treatment BAT Conclusions or the requirements of the Non-hazardous and inert waste: appropriate measures for permitted facilities guidance.</p> <p>We have added Improvement Condition (IP1) to the permit which requires the operator to review the design of the containment bays and the external storage areas to ensure that they are in line with the provisions of the Non-hazardous and inert waste: appropriate measures for permitted facilities and BATs 14 and 19 of the Waste Treatment BAT Conclusions.</p>
BAT 20 - waste water treatment	NA	There is no treatment of wastewater on site. Wastewaters from the external waste storage areas and containment bays are collected and diverted to the sealed storage tank before being tanked offsite for treatment at a suitably licensed treatment facility.
BAT 21 - prevent or limit the environmental consequences of accidents and incidents	CC	The site has a dedicated Accident Management Plan that includes Enva's 'Emergency Response Plan' and 'Business Continuity Plan' - this identifies potential accidents and emergency situations and plans to minimise the effects of these events. All site staff are trained in aspects which could lead to pollution incident or accidents, they know how to deal with accidents and incidents and understand their individual responsibilities. The techniques for accidents and incidents are detailed in the Accident Management Plan.
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 (physical treatment), we agree that this BAT is not applicable.
BAT 23 - Energy efficiency plan, energy balance record	NA	<p>The operator has an Energy Efficiency Plan which estimates the specific energy consumption for site activities on a kWh/tonne of waste processed basis. The plan sets target for the purposes of planning and achieving improvements in energy efficiency on site.</p> <p>The operator is committed to maintain records of energy consumption by source including electricity and vehicle / plant fuels on site. No energy is generated at the site. Give the limited number of energy sources and lack of energy generation on site, it is not considered that an energy balance is necessary for this site.</p>
BAT 24 - maximise reuse of packaging	NA	<p>Due to the nature of site operations, there is not a significant amount of packaging generated on site. Due to this, a dedicated residues management plan is not considered necessary for the site. Of the little packaging generated on site, the following techniques are employed to reduce the quantity of waste sent to landfill:</p> <ul style="list-style-type: none"> ▪ Items considered to have re-use or re-sell capacity are pulled off the sorting belts on site (i.e. metals, wood, plastics); ▪ Empty oil drums are reused for storing non-conforming materials; and ▪ Skips and bins are always reused and repaired to extend their life span. An on-site skip refurbishment means that skips are repaired and repainted regularly.

BAT 25 - General - Emissions to air (Techniques to reduce plus AEL for dust).	CC	<p>Most of the waste treatment and storage operations that form part of the Installation are taking place within a building to minimise diffuse air pollution.</p> <p>The permit also does not allow channelled emission to air and there is no channelled emission to air from the Installation activities.</p> <p>As part of the SRF processes, there is an air separation unit in place within Area 2 building to separate dust from the air. As per BAT requirements, the unit is fitted with fabric filters in the form of socks which capture and separate dust particles from the process, whilst air is then returned to the process. The dust is collected into bins beneath the filter socks, and these are periodically removed by cleaning operatives and combined back with the finished product. Although there is no channelled emission to air associated with this unit, we have included process monitoring of the unit in Table S3.2 of the permit to ensure that efficiency of the unit is maintained, and that dust and particulate emissions are below 5mg/m³.</p>
BAT 26 - Metal shredders (Reduce accidents & incidents)	NA	The installation activities do not involve mechanical treatment in shredders of metal waste and as such, it is considered that this BAT not applicable.
BAT 27 - Deflagrations (Prevent & reduce emissions from deflagrations)	NA	Same as above (re: BAT 26).
BAT 28 - Energy efficiency (Shredder feed stability)	NA	Same as above (re: BAT 26).
BAT 29 - WEEE containing VFCs and/or VHCs (Emissions of organic compounds to air including AELs)	NA	Same as above (re: BAT 26).
BAT 30 - Explosions when treating WEEE (Prevent emissions due to explosions)	NA	Same as above (re: BAT 26).
BAT 31 - Emissions to air (Techniques to reduce emissions to air including AEL)	CC	<p>Most of the waste treatment and storage operations that form part of the Installation are taking place within a building to minimise diffuse air pollution.</p> <p>The permit also does not allow channelled emission to air and there is no channelled emission to air from the Installation activities.</p> <p>As part of the SRF processes, there is an air separation unit in place within Area 2 building to separate dust from the air. As per BAT requirements, the unit is fitted with fabric filters in the form of socks which capture and separate dust particles from the process, whilst air is then returned to the process. The dust is collected into bins beneath the filter socks, and these are periodically removed by cleaning operatives and combined back with the finished product. Although there is no</p>

		channelled emission to air associated with this unit, we have included process monitoring of the unit in Table S3.2 of the permit to ensure that efficiency of the unit is maintained, and that dust and particulate emissions are below 5mg/m3.
BAT 32 - WEEE containing mercury (Emissions to air including AEL)	NA	No WEEE is accepted and/or treated as part of the Installation activities.
BATs 33 - 53	NA	We considered that BATs 33 - 53 are not applicable to installations that are producing SRF. We consider SRF treatment as mechanical treatment of waste.
Reg. 61 Request for Further Information (RFI)		
Assessment of response received		
Review the list of wastes in your permit		<p>The operator reviewed the list of wastes in the permit by removing waste types that are not well aligned to the SRF process. The operator provided the amended list of wastes to be removed/retained in Table 1 of their response to the RFI dated 01/02/2022.</p> <p>The list of wastes for the SRF process was further amended in the response received from the operator on the 27/05/2022. In the response received on the 27/05/2022, the operator provided a distinctive list of wastes that they are accepting under each of the Waste Operation activities. These were used in populating Tables S2.3 – S2.8 of the permit.</p>
Review the waste codes in Table S2.2 of your current permit by removing all waste codes that are not relevant to your site operations		<p>The operator also reviewed the list of waste they are accepting under the Installation activities by removing waste that are not relevant to the Installation activities.</p> <p>Waste types that are accepted under the Waste Operation activities were not reviewed because the operator advised us to limit the scope of the Permit Review to the Installation activities only.</p>
Amend Table S2.2 by separately identifying wastes accepted under the installation activities and wastes accepted under the each of the Waste Operation activities listed under Activity A7 of Table S1.1 (e.g., metal, wood, gypsum recycling etc.).		<p>The operator reviewed the list of wastes in Table S2.2 of the permit and split the table by identifying wastes they are accepting under the Installation activities and wastes that you are accepting under each of the Waste Operation activities.</p> <p>The list of wastes for the activities are detailed in the document titled 'Enva Colwick SRF EWC codes review and comments 26th May 2022' received on the 27/05/2022.</p>
Provide further clarification on the quantity of wastes that are treated and stored at any one time under both the installation and waste operation activities.		The operator provided details of the wastes that they are treating and storing at any one time under the Installation and Waste Operation activities, including information on the maximum storage capacity for each activity in Tables 2 and 3 of the RFI Response Letter dated 01/02/2022.

<p>Amend Table 2-3 of the response to the Regulation 61 Notice by providing the quantity of wastes that are being stored at any one time in tonnes (and not in m³). The waste quantities need to be listed against the activities (SRF production, metal, wood recycling etc.) and not against the process [e.g., Material Recycling Facility (MRF)].</p>	<p>The operator provided details of the wastes that they are storing at any one time under the Installation and Waste Operation activities, including information on the maximum storage capacity for each activity in Tables 2 and 3 of the RFI Response Letter dated 01/02/2022.</p>
<p>Confirm if you are producing SRF only or SRF and Refuse Derived Fuel (RDF) at the site.</p>	<p>The operator confirmed that they are producing both SRF and RDF at the site but advised that that their RDF production should not be included within the scope of pre-treatment of waste for incineration because it is limited to baling or export of loose waste only.</p> <p>Having considered the provisions of our Regulatory Guidance Note (RGN2 Appendices 1 and 2), we have agreed to regulate the SRF production activity as an Installation activity (Activity AR1 of Table S1.1) and the RDF production a Waste Operation activity (under Activity AR7 of Table S1.1).</p>
<p>Review the design of the building and confirm that it is suitable to meet the requirements outlined in Sections 6.1 - 6.3 of the Non-hazardous and inert waste: appropriate measures for permitted facilities and BAT 14d of the Waste Treatment BAT Conclusion. E.g. are the buildings contained and under negative pressure? Do they have fast acting doors? Do you have local extraction systems on treatment units and emission sources</p>	<p>The operator provided a review of the building design in the document titled '416.12111.00002_Colwick_Reg_61_Question_7_Response' which we have not included as an operating technique in the permit.</p> <p>We assessed the document and concluded that the operator has not provided enough information to demonstrate that the building is in a suitable state to meet the requirements outlined in Sections 6.1 - 6.3 of the Non-hazardous and inert waste: appropriate measures for permitted facilities and BAT 14d of the Waste Treatment BAT Conclusion. The operator acknowledged that the building is not under negative pressure and some of the doors in the building are in a state of disrepair. Accordingly, we have included Improvement Condition IP1 in the permit which requires the operator to carry out a detailed review of the existing buildings for the SRF processes, containment bays for storage of SRF residues and treatment equipment for the SRF process 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 BATs 14d and 19e of the Waste Treatment BAT Conclusions.</p> <p>The operator is required to submit a written report of the review to the Environment Agency for approval, outlining the results of the review and measures and procedures that are in place in the buildings and within the containment bays to prevent and/or reduce fugitive emissions of dust, odour and noise.</p>
<p>Provide justification as to why some of the waste treatment operations (metal, wood and aggregate recycling activities) are being undertaken outside the building and</p>	<p>The operator opted not to respond to this question because they considered that it is waste operations focused. We offered the operator the opportunity for us to review the waste operation activities as part of this permit review, but they decided that we should limit the scope of the review to the Installation activities only.</p>

demonstrate that this is suitable and in line with the requirement of BAT 14d of the Waste Treatment BAT Conclusion	
Provide justification on why inert waste, uncontaminated ferrous and non-ferrous metal wastes and wood wastes are listed under the Activity A2 (Table S1.1) of your permit	<p>The operator confirmed that they are not using inert waste, uncontaminated ferrous and non-ferrous metal wastes in the SRF production process but that they may use wood waste in some cases where the SRF production specifications require high biomass content.</p> <p>They stated that the SRF feedstock is processed to remove unsuitable items such as inert waste, metals, etc and that these are removed for further processing in relevant areas of the site.</p> <p>Given that the A2 (now AR2) Activity is storage of waste prior to treatment, we have deleted references to inert waste, uncontaminated ferrous and non-ferrous metal etc. from Activity AR2 of the permit.</p>
Provide a comprehensive drainage layout plan that shows the drainage routes and the catchment area for each of the drainage outfall	The operator provided a drainage drawing in response to the RFI request (see response received on the 01/02/2022). We considered that the drainage drawing is not comprehensive; as such we have added Improvement Conditions IP4 and IP5 which require the operator to survey the drainage infrastructure at the site and submit an updated drainage drawing to the Environment Agency for approval
Provide accurate information on your drainage plan for the wood processing area – is the area draining to the sealed collection tank or to the soakaway	<p>The operator in the response stated that <i>'wood processing on site is a regulated waste operation activity rather than an installation. Information in response to the RFI is being provided in relation to the installation activity only. Information relating to the waste operations is to be provided at a later date'</i>.</p> <p>We considered this as sufficient given that the operator has opted to limit the scope of this review to the Installation activities only.</p>
Provide information on the nature of the pollutants and quantity of contaminated runoff/wastewater that you are discharging from the waste treatment/storage (e.g., wood processing area	<p>The operator in the response stated that <i>'information in response to the RFI is being provided in relation to the installation activity only. Information relating to the waste operations is to be provided at a later date'</i>.</p> <p>We considered this as sufficient given that the operator has opted to limit the scope of this review to the Installation activities only.</p>