Permitting Decisions- Environment Agency Initiated Variation

We have issued an Environment Agency initiated variation for Melton Waste Park operated by Transwaste Recycling and Aggregates 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/BP3792LD/V009.

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.

The notice required 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. 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 – Not Compliant; Improvement/New Condition included

Regulation 61 Response

The Regulation 61 notice response from the Operator was received on 17/09/2021.

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 27/01/2022 and received their response on the 16/02/2022 and further information on the 12/05/2022 and 17/05/2022.

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

- Documents received in response to the Regulation 61 Notice - Transwaste Recycling and Aggregates Ltd.: Non-Technical Summary.
- Document received in response to questions 1 to 3 and 5 to 10 of the RFI, including the amended BAT assessment document titled ‘Transwaste BAT Conclusions Feb. 2022’.
- Document titled ‘EWC code justification May 22’.
- Email and documents titled ‘Transwaste surfaces and drainage’, ‘general site layout including developments’, ‘Waste Storage Locations’, ‘Transwaste Schedule 1 Operations final’ and ‘Transwaste EWC Code Removal’.
- Email and documents titled ‘Impermeable Surfaces and Drainage’ and ‘EWC Codes to be moved from AR7 to AR8’.
- Email agreeing to the removal of waste EWC code 08 04 14, and documents titled ‘Biodegradable Kitchen and Canteen Waste 20 01 08’,

containing details of procedure for managing the biodegradable kitchen and canteen waste.

- Email agreeing to removal of waste code 09 01 10 from Table S2.2 and 10 13 14 from Table S2.4.

- Email agreeing to the removal of waste code 03 03 10 and 10 01 07 from Table S2.4.

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 2.5.3 – 2.5.8 have been delete because the operator is not treating WEEE at the site.
- Condition 2.7.1 has been deleted because the pre-operational condition is no longer relevant.
- Condition 3.5.1 (b) has been amended by renumbering the referenced process monitoring table from S3.4 to S3.2.
- Condition 3.5.1 (c) has been amended by renumbering the referenced bioaerosols monitoring table from S3.5 to S3.3.
- Condition 3.5.4 has been amended to refer to Table S3.1 instead of S3.2.
- Condition 4.3.2 has been added because it is relevant to the waste operation activities. The follow-on conditions have been renumbered accordingly.
- Condition 4.3.3 (previously condition 4.3.2) has been amended to refer to conditions 4.3.1 and 4.3.2. The follow-on conditions have been renumbered accordingly.
- Table S1.1 as referenced in Condition 2.1.1 has been amended to clearly define the activities that are undertaken at the site and to apply relevant limits to them. The activity references were changed to match with the modern permit template.
- 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.
- Tables S1.3 and S1.4 as referenced in the last variation have been deleted. The follow-on tables have been renumbered.
- Table S1.3 (previously S1.5) as referenced in Condition 2.6.1 has been amended to incorporate following changes:
    - IC1 and IC2 have been amended and with new deadlines for compliance.
    - IC3 has been updated with a new deadline for compliance.

- IC4 is no longer required because it has been replaced with IC7 and IC8.
- IC5 and IC6 have been added; these require the operator to carry out a detailed review of the existing buildings and treatment equipment at the site, including the treatment operations that are undertaken outside of the buildings and to implement the identified improvements.
- IC7 and IC8 have been added; these require the operator to submit a proposal to cover to cover areas where activities AR7, AR9 and AR10 are undertaken with impermeable surfacing and sealed drainage systems and to implement the identified improvements.
- IC9 has been added; this requires the operator to submit updated EMS.

- Table S1.6 has been deleted because pre-operation condition PO1 is now completed and PO2 has been moved into Table S1.3 as improvement condition IC3b.
- Tables S2.2 – S2.4 and S2.7 as referenced in Condition 2.3.4 have been amended by removing waste types that are not appropriate to the permitted activities.
- Tables S2.2 – S2.7 as referenced in Condition 2.3.4 have been amended by changing the annual throughput of the site from 500,000 tonnes to 750,250 tonnes as agreed in the approved Fire prevention Plan.
- Table S3.1 as referenced in Condition 3.5.1 (a) has been amended by including parameters, BAT AELs and monitoring standards that are relevant for direct emissions of site effluent to surface water.
- Tables S3.2 and S3.3 as referenced in the last variation have been deleted. The follow-on tables have been renumbered.
- Table S4.1 as referenced in condition 4.2.3 has been amended by adding reporting requirements for point source emission, process and bioaerosols monitoring to the table.
- Table S4.4 as referenced in conditions 4.2.2 (c) and 4.2.3 (b) has been amended by adding reporting form for emissions to water and ambient/bioaerosol monitoring.
- Schedule 5 as referenced in condition 4.3.3 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 interpretations that are 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	The operator has ISO14001 Management System in place at the site. However, the operator indicated that this requires, amongst other things, updating of the annual emergency-preparedness, spill response exercises, and addition of residues management plan. We have included Improvement Condition IC9 which requires the operator to update the site's existing Environment Management System (EMS) and send a copy to the Environment Agency for written approval
BAT 2 - Waste pre-acceptance, acceptance and tracking appropriate measures	CC	The operator confirmed that they have waste acceptance procedures including procedure for waste tracking and reporting.
BAT 3 - Inventory of wastewater and waste gas streams	CC	There are no channelled emissions to air from the site but there are channelled emissions of contaminated waters to surface water. The operator indicated that the site is not generating wastewater from the treatment activities, however, it is evident that contaminated waters are generated within the site area. The contaminated waters that are generated within the site area are diverted through two full-retention separators working in parallel and discharged via a settlement lagoon to an unnamed stream flowing to the Humber Estuary. In line with the WT BATC, we have included monitoring requirements (parameters and limits) in Table S3.1 of the permit.
BAT 4 - Storage procedures	CC	The operator confirmed that they have storage procedures in place at the site. Details of waste storage procedures in contained in the site's Fire Prevention Plan.
BAT 5 – Waste handling and transfer procedures	CC	The operator confirmed that they have waste handling and transfer procedures in place.
BAT 6 - monitor key process parameters	CC	The operator confirmed that contaminated run-off from the site area is discharged to surface water under consent. In line with the WT BATC, we have included monitoring requirements (parameters and limits) in Table S3.1 of the permit.
BAT 7 - monitor emissions to water	CC	Water is not used, and wastewater is not generated as part of the RDF and SRF treatment processes; however, the operator confirmed that contaminated run-off from the site area is discharged to surface water under consent. In line with the WT BATC, we have included monitoring requirements (parameters and limits) in Table S3.1 of the permit.

BAT 8 - monitor channelled emissions to air	NA	There is no channelled emission to air. The permit does not allow channelled emission to air.
BAT 9 - monitor diffuse emissions of organic compounds to air	NA	The installation activities do 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	FC	Odour monitoring points are established on and off-site. Monitoring is undertaken on daily basis in accordance with the site's OMP. Although, the operator indicated that their current OMP is not in compliance with EN 13725, we have considered that EN 13725 is not particularly relevant given that the treatment activity is not biological treatment. However, we have included in the permit, improvement condition IC1 which requires the operator to submit an updated OMP to the Environment Agency for approval.
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	FC	We consider that the Odour Management Plan (OMP) needs updating to take into account increase in waste throughput from 500,000 tonnes to 750,250 tonnes permit. We have included in the permit, improvement condition IC1 which requires the operator to submit an updated OMP to the Environment Agency for approval.
BAT 13 - reduce odour emissions	FC	The operator is relying on alternative odour abatement system for odour control at the site. They are using 'Terminodour' treatment technology that uses positive pressure ionisation for odour control. We do not consider the ionisation system as BAT. The operator needs to demonstrate this technology represent an effective and alternative technology for control of fugitive emission of odour. We have included Improvement Conditions IC5 and IC6 which require the operator to review of the existing buildings, treatment equipment at the site, including the treatment operations that are undertaken outside of the buildings, to ensure that they are in accordance with the requirements specified in the Non-hazardous and inert waste: appropriate measures for permitted facilities guidance and BAT 14 of the Waste Treatment BAT Conclusions.
BAT 14 - reduce diffuse emissions to air	FC	The operator indicated that they are complying with all the requirements in BAT 14 other than BATs 14b and 14h which are not appropriate to their activities undertaken. Although the operator stated that the permitted installation treatment activities are undertaken in buildings, not all of the buildings are totally enclosed. To address the deficiencies, we have included Improvement Conditions IC5 and IC6 in the permit which require the operator to carry out a detailed review of the existing

		buildings, treatment equipment and operations to ensure that they are in accordance with the requirements specified in the Non-hazardous and inert waste: appropriate measures for permitted facilities guidance BAT 14 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	Based on our internal noise screening, a noise impact assessment and noise management plan are required. The closest residential property is located 200 metres from the site. Most of the site operations are taking place within buildings. We do not have history of noise compliant from the site. The operator has a noise and vibration management plan that is linked to their EMS ISO 14001.
BAT18 - reduce noise and vibration emissions	CC	Based on our internal noise screening, a noise impact assessment and noise management plan are required. The closest residential property is located 200 metres from the site. Most of the site operations are taking place within buildings. We do not have history of noise compliant from the site. The operator has a noise and vibration management plan that is linked to their EMS ISO 14001.
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 SRF and RDF treatment processes. The operator indicated that the site is not generating wastewater from the treatment activities, however, it is evident that contaminated waters are generated within the site area. The contaminated waters that are generated within the site area are diverted through two full-retention separators working in parallel and discharged via a settlement lagoon to an unnamed stream flowing to the Humber Estuary.
BAT 20 - waste water treatment	CC	The operator indicated that the site is not generating wastewater from the treatment activities, however, it is evident that contaminated waters are generated within the site area. The contaminated waters that are generated within the site area are diverted through two full-retention separators working in parallel and discharged via a settlement lagoon to an unnamed stream flowing to the Humber Estuary. In line with the WT BATC, we have included monitoring requirements (parameters and limits) in Table S3.1 of the permit.
BAT 21 - prevent or limit the environmental consequences of accidents and incidents	CC	The operator has ISO14001 Management System in place at the site. There are 24 hours security and CCTV in place at the site. The site has spill kits at designated locations that are monitored and maintained. Firewater containment is detailed in the FPP. Site diary to log accidents is in place. Emergency procedures are tested annually – including spill/containment exercises – these are linked to the site's EMS.

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	FC	The processes are not energy intensive operations. The operator indicated that not all of BAT 23 requirements are currently in place at the site and agreed that they have sets of improvement programmes that are aimed at making the overall operations energy efficient.
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	The waste treatment activities are taking place within a building to minimise diffuse air pollution. There is no channelled emission to air and the permit does not allow channelled emission to air. The operator indicated that the dust and emission management plan (DEMP) has recently being updated and that it is effective in ensuring that dust emissions are controlled.
BAT 26 - Metal shredders (Reduce accidents & incidents)	NA	The installation is for the mechanical processing of non-hazardous waste for the production of SRF and RDF. There is no treatment in shredders of metal waste, including WEEE and ELVs and their components and as such we agree that BAT 26 does not apply.
BAT 27 - Deflagrations (Prevent & reduce emissions from deflagrations)	NA	The installation is for the mechanical processing of non-hazardous waste for the production of SRF and RDF. There is no treatment in shredders of metal waste, including WEEE and ELVs and their components and as such we agree that BAT 27 does not apply.
BAT 28 - Energy efficiency (Shredder feed stability)	NA	The installation is for the mechanical processing of non-hazardous waste for the production of SRF and RDF. There is no treatment in shredders of metal waste, including WEEE and ELVs and their components and as such we agree that BAT 28 does not apply.
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. There is no treatment in shredders of metal waste, including WEEE, ELVs and their components and there are no channelled emission points to air 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. There is no treatment in shredders of metal waste, including WEEE and ELVs and their components. 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	There is no channelled emission to air and the permit does not allow channelled emission to air.

BAT 32 - WEEE containing mercury (Emissions to air including AEL)	NA	WEEE is not being treated at the site. There is no channelled emission to air and the permit does not allow channelled emission to air.
BATs 33 - 53	NA	We considered that BATs 33 - 53 are not applicable to installations that are producing SRF and RDF. We consider SRF and RDF treatment activities as mechanical treatment.
Reg. 61 Request for Further Information (RFI)	**Assessment of response received**	
Provide a site layout plan(s) and clearly identify on the plan(s), the locations of all site's infrastructure (both inside and outside the building)	The operator provided site layout plans which show the locations of all site treatment and storage infrastructure. We considered the site layout plans to be acceptable and have incorporated these in Table S1.2 of the permit.	
Review the list of wastes in the permit and provide justification on why some of the waste codes need to be retained.	The operator in their initial response received on the 16/02/2022 indicated that they would prefer to retain all of the waste codes. They indicated that not all wastes are treated; for example, WEEE wastes are received for storage and transfer. However, the operator agreed in this same response that the following EWC codes should be removed from Table S2.2: 09 01 12, 10 05 01, 10 05 09, 10 05 11, 10 06 01,10 06 02, 10 06 10, 10 07 02, 10 07 05, 10 07 08. In the responses received on the 12/05/2022, 08/08/2022, 08/09/2022 and 23/09/2022, the operator provided further information on the list of wastes to be retained and/or removed in Tables S2.2, S2.3, S2.4 and S2.7.	
Review the waste codes in Tables S2.2, S2.3, S2.4 and S2.7 of your current permit by removing all waste codes that are not relevant to your site operations	The operator provided the list of wastes they want to retain or remove in Tables S2.2, S2.3, S2.4 and S2.7 in their responses to the RFI received on the 16/02/2022, 12/05/2022, 08/08/2022, 08/09/2022 and 23/09/2022.	
Provide clarification on the quantity of waste that are treated and/or stored at any one time under the installation and waste operation activities.	The operator stated that it is not possible to provide typical figures for waste-specific tonnages as these vary considerably from day-to-day and season-to-season (etc.) according to market conditions (and for example the level of activity within the construction sector). As a general comment, the operator stated that the site will always comply with permitted limits as specified within Table S1.1 of the permit. As an overview, the operator gave an indication of the waste quantity that they are receiving under each of the waste codes.	
Review design of all of your site's buildings and confirm that they are suitable to meet the requirements outlined in Sections 6.1 - 6.3 of the Non-	The operator confirmed that *'previously installed fast-acting doors that are no longer as effective as they once were, are to be replaced with new fast-acting doors as part of a building maintenance programme…'.*	

hazardous and inert waste: appropriate measures for permitted facilities and BAT 14d of the Waste Treatment BAT Conclusion.	We have included Improvement Conditions IC5 and IC6 which require the operator to review of the existing buildings, treatment equipment at the site, including the treatment operations that undertaken outside of the buildings to ensure that they are in accordance with the requirements specified in the Non-hazardous and inert waste: appropriate measures for permitted facilities guidance and BAT 14 of the Waste Treatment BAT Conclusions.
Review all of your external waste treatment and storage activities (example Activities AR8 and AR9) and provide justifications on why they should not be undertaken within an enclosed building(s).	The operator states that *'beyond waste storage activities of baled wastes and wood – see above, the only activities undertaken outside enclosed buildings are screening activities of non-odorous wastes (potentially-odorous wastes are treated within buildings). Storage of baled wastes occurs only for a short time whilst awaiting export capacity. All bales are securely-wrapped such that liquids cannot leach, nor dusts escape. Storage durations are short and prevent the escape of potential odours'.* We have accepted that storage and treatment of waste under activities AR7, AR9 and AR10 may be undertaken on an impermeable surface or on a hardstanding pending the completion of the Improvement Conditions IC7 and IC8 of Table S1.5.
Is there any reason why you do not have separate collection systems for clean and contaminated waters?	The operator stated that current wastewater management system at the site *'…requires the use of a pond as a settling tank for effluent from the klargesters, prior to monitoring and discharge off site. The pond storage is also an integral part of the Fire Prevention Plan infrastructure. Without 'clean' water, the levels needed could not be maintained whilst the risk of odour-release from the pond would be significantly increased as a result – when there is no free water. A surface aerator acts to introduce oxygen and help reduce odour-related risks and again, without the 'clean' water element there would be periods where the effectiveness, maintenance and management of the aerator would be severely compromised'.* In accordance with the WT BAT Conclusions, we have included in Table S3.1 of the permit appropriate BAT AELs and monitoring requirements for direct discharge to water. We have also included a restriction under activity AR6 of the permit which specifies that **uncontaminated roof water and contaminated site surface water shall not be mixed prior to discharge.**
Clarify the conflict that exists in your response to BAT 6, Annex 1 of the Regulation 61 Notice response and the monitoring requirements of Table S3.1 of your permit.	The operator stated that *'this apparent conflict is caused by interpretation issues whereby site run-off was not considered as 'process water' at the time of original s61 response. All monitoring requirements identified in Table S3.1 are conducted as required by the permit.* In accordance with the WT BAT Conclusions, we have included in Table S3.1 of the permit appropriate BAT AELs and monitoring requirements for direct discharge to water.
Amend the monitoring requirements in Table S3.1 of your permit to match with those in Table 6.1 of the Waste Treatment BAT Conclusions.	The operator stated that *'the initial response (to BAT 6 Annex 1) said "No process wastewater. Permitted discharge consent for waters from surface drainage with specified monitoring parameters and frequency. Details within current permit." This infers the above (Q8) interpretation and confusion over the terminology. The original response has been amended to say "Contaminated run-off from yard has permitted discharge consent for waters from surface drainage and with specified monitoring parameters and frequency. Details within current permit." This xls spreadsheet has been included in the s61 response as an additional document'.*

	With this and in *accordance with the WT BAT Conclusions, we have included in Table S3.1 of the permit appropriate BAT AELs and monitoring requirements for direct discharge to water*
Provide further information to demonstrate that your current odour abatement systems are suitable to be considered Best Available Techniques (BAT).	The operator stated that *'The ionisation system that is currently installed at great cost was agreed as BAT at the time of installation. The system manufacturers are currently in discussions to prove that the system represents BAT through use of already available scientific data. Regardless of this, Transwaste is currently installing a refrigeration system in buildings to significantly reduce building temperature and thus reduce odour volatility thereby reducing odour production – in recognition of the hierarchy of odour management options. This together with air extraction and fast closing doors (as above) will act together to ensure effective control of odours from processing activities'* We do not consider the ionisation system as BAT. The operator needs to demonstrate this technology represent an effective and alternative technology for control of fugitive emission of odour. We have updated Improvement Condition IC1 which requires the operator to submit an updated Odour Management Plan to the Environment Agency for approval. We have also included Improvement Condition IC4 which requires the operator to review of the existing buildings, treatment equipment at the site, including the treatment operations that undertaken outside of the buildings to ensure that they are in accordance with the requirements specified in the Non-hazardous and inert waste: appropriate measures for permitted facilities guidance and BAT 14 of the Waste Treatment BAT Conclusions.