

Permitting Decisions- Environment Agency Initiated Variation

We have issued an Environment Agency initiated variation for Rugby Solid Recovered Fuel Facility operated by SUEZ Recycling and Recovery 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/EP3033EJ/V003.

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 15/09/2021.

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

We needed further information to complete our permit review assessment.

We issued a request for further information (RFI) by email to the operator on the 01/12/2021. The operator responded with further information on the 09/12/2021.

These responses are available on our public register.

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

- Documents received in response to the Regulation 61 Notice including Annex 1 of the Regulation 61 Notice response excluding responses to BAT 31.
- Responses to questions 4, 5 and 6 submitted in response to the RFI.

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 2.3.3 has been added as the site uses raw materials such as oils and fuels. However, no limits have been set. This condition

was previously omitted in error. The follow-on conditions have been renumbered as 2.3.4, 2.3.5 and 2.3.6.

- Condition 2.5.1 has been deleted as the pre-operational condition 1 of Table S1.4 has been completed.
- Conditions 3.5.1 – 3.5.4 have been added as there are point source emissions with monitoring requirements in the permit. The follow-on conditions have been renumbered as 3.6.1 and 3.6.2.
- Condition 3.7.1 has been added as this condition was previously omitted.
- Conditions 4.2.2 and 4.2.3 have been added as these conditions were previously omitted. The follow-on conditions have been renumbered as 4.2.4 and 4.2.5.
- Condition 4.3.2 has been amended to remove reference to conditions 4.3.1(a)(i) and 4.3.1(b)(ii).
- Table S1.1 as referenced in Conditions 2.1.1 and 2.1.2 has been amended to follow the latest permit template and clearly define the limits and waste types of the activities and to add Directly Associated Activities that were omitted.
- 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 mark IC1 and IC2 completed and add 3 new improvement requirements (IC3, IC4 and IC5).
- Table S1.4 has been deleted as Pre-operational condition 1 has been complied with.
- Table S2.1 has been added as the site uses raw materials such as oils and fuels.
- Table S2.2 has been amended to remove and restrict some of the waste types that are not suitable for SRF production.
- Table S3.1 has been amended to include associated limit and monitoring requirements.
- Table S3.2 has been amended to refer to the site plan in Schedule 7 and include oil and grease in monitoring parameters.
- Table S3.3 as referenced in condition 3.5.1 has been added to include process monitoring requirements.
- Tables S4.2 – S4.4 have been added to implement the reporting requirements of the permit.
- 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 has been amended to include new interpretations associated with the permit review.

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

Appropriate measures	Compliance status	Assessment of the installation’s compliance with relevant standards (appropriate measures) and any alternative techniques proposed by the operator
BAT 1 - EMS	CC	The operator has 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 in place. Waste tracking is managed via the operator’s electronic materials management system.
BAT 3 - Inventory of wastewater and waste gas streams	IC	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. There are no channelled emissions to water or sewer at the site but there are channelled emissions to air. Therefore, we have included IC3 in the permit which requires the operator to characterise the waste gas stream.
BAT 4 - Storage procedures	CC	The operator confirmed that Waste Storage arrangements are detailed in Report 1826/R004/1 (BAT Report August 2013 - attachment 7) which was approved as part of the original permit application. Storage of waste is within a building. Pre-loaded trailers might be stored overnight in designated HGV parking bays located outside. This will facilitate transfer to customer at an appropriate rate throughout the day and night. The activities of the pre-loaded trailers that are parked outside of the permit boundary is beyond the remit of this permit.
BAT 5 - Handling and transfer procedures	NC/IC	The operator confirmed that arrangements for the handling & storage of wastes are detailed in Report 1826/R004/1 (BAT Report August 2013 - attachment 7) which was approved as part of the original permit application. The operator has confirmed that the unloading of waste will take place within the waste reception area of the process building. Vehicles will enter the building through fast acting doors. The doors will open and close at high speed and only remain open for a very short time to allow the vehicle to enter or leave the building. However, there is a history of litter pollution around the site and roads. Therefore, we have included an improvement condition IC5 in the permit to request the operator to review their current litter management plan to ensure that the waste is handled in a manner to prevent litter escape.
BAT 6 - monitor key process parameters	NA	The installation will only accept dry, non-hazardous waste for processing/separation to produce SRF. No waste waters are generated during the operations. Due to the nature of the SRF 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 SRF treatment process, as such monitoring of emission to water is considered not applicable. The only water that is being

		discharged from the site is roof water and surface water runoff from Areas that are not being used for waste operations.
BAT 8 - monitor channelled emissions to air	NC/IC	<p>There are channelled emissions to air through odour ventilation stacks A1, A2, and A3. We have included an improvement condition IC3 in the permit which requires the operator to carry out an assessment and characterisation of the waste gases released from these stacks. Currently, the emissions are released unabated and there is not enough representative monitoring data available to determine if the site is complying with BAT-AEL for TVOCs. IC3 requires the operator to submit a written report to the Environment Agency for approval that outlines:</p> <ul style="list-style-type: none"> - Results of at least three monitoring rounds for all odorous compounds (odour profile) during full operation; - Compliance against the BAT-AEL for TVOCs; - The suitability of the current odour control measures for channelled odour emissions from the facility to meet with the requirements of BAT 14d and BAT31; and - any improvements necessary with timescales for implementation. <p>We have included odour monitoring requirements including TVOC limit in Table S3.1 of the permit subject to completion of IC3.</p> <p>IC4 requires the operator to review the current Odour Management Plan and submit a revised version of it to the Environment Agency for written approval. This is required upon completion of IC3.</p>
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	NC/IC	The operator has an approved Odour management plan (Report number /R1826/R/005/AppendixA/1) in place but we have included improvement conditions IC3 and IC4 in the permit to ensure that waste gases are characterised and compliance against the BAT-AEL for TVOCs is determined to assess the suitability of the current odour control measures for channelled odour/TVOCs emissions from the facility. The operator is required to meet with the requirements of BAT 14d and BAT 31. We have also included odour monitoring requirements including TVOC limit in Table S3.1 of the permit subject to completion of IC3.
BAT 11 - monitor consumption of water, energy and raw materials, and generation of residues and waste water	CC	The operator has confirmed that annual consumption of water, energy and raw materials and the annual generation of residues and waste water is monitored.

		Conditions 4.2.2 and 4.2.3 have been added to the permit which require the operator to submit end of year report for water and energy usage. Raw material usage is required to be reported under the performance parameters reporting form.
BAT 12 - odour management plan	NC/IC	The operator has an approved Odour management plan (Report number /R1826/R/005/AppendixA/1) in place but we have included improvement conditions IC3 and IC4 in the permit to ensure that waste gases are characterised and compliance against the BAT-AEL for TVOCs is determined to assess compliance against the BAT-AEL for TVOCs and suitability of the current odour control measures for channelled odour emissions from the facility to meet with the requirements of BAT 14d and BAT 31. We have also included odour monitoring requirements including TVOC limit in Table S3.1 of the permit subject to completion of IC3.
BAT 13 - reduce odour emissions	NC/IC	The operator has an approved Odour management plan (Report number /R1826/R/005/AppendixA/1) in place but we have included improvement conditions IC3 and IC4 in the permit to ensure that waste gases are characterised and compliance against the BAT-AEL for TVOCs is determined to assess suitability of the current odour control measures for channelled odour emissions from the facility to meet with the requirements of BAT 14d and BAT 31. We have also included odour monitoring requirements including TVOC limit in Table S3.1 of the permit subject to completion of IC3.
BAT 14 - reduce diffuse emissions to air	NC/IC	<p>The operator has an approved Odour management plan (Report number /R1826/R/005/AppendixA/1) in place but we have included improvement conditions IC3 and IC4 in the permit to ensure that waste gases are characterised and compliance against the BAT-AEL for TVOCs is determined to assess suitability of the current odour control measures for channelled odour emissions from the facility to meet with the requirements of BAT 14d and BAT 31. We have also included odour monitoring requirements including TVOC limit in Table S3.1 of the permit subject to completion of IC3.</p> <p>The operator is committed to ensure that all emissions to air from the installation are free from visible concentrations of dusts, fibres or particulates that are likely to cause pollution of the environment, harm to human health and serious determinant to the amenity of the locality outside the site boundary. All waste operations are taking place within a building to minimise diffuse air pollution. Dust will be managed at point of source, with targeted collection systems being located throughout the plant such as shredder hoods and trommels. Ducts will transfer the extracted air to a centralised bag filter located within the building on an external wall with dust being removed into containers or bags for disposal.</p>

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	The operator has a Noise and Vibration management plan (Report number /R1826/R/005/AppendixB/1) in place.
BAT18 - reduce noise and vibration emissions	CC	The operator has a Noise and Vibration management plan (Report number /R1826/R/005/AppendixB/1) in place.
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 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 indicated that potential impact of accidents and incidents as well as their prevention and management is detailed in Report 1826/R004/1 (BAT Report, August 2013, attachment 7) and the Environmental Risk Assessment (1826/R005/4, January 2014, attachment 3) which were submitted as part of the original permit application.
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 indicated that Energy usage is detailed in Report 1826/R004/1 (BAT Report, August 2013, attachment 7) which was approved as part of the original permit application.
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).	NA	The site does not undertake treatment of metal waste in shredders or treat WEEE. Given the nature of the waste treatment operations, we agreed that this BAT is not applicable.

BAT 26 - Metal shredders (Reduce accidents & incidents)	NA	The site does not undertake treatment of metal waste in shredders or treat WEEE. Given the nature of the waste treatment operations, we agreed that this BAT is not applicable.
BAT 27 - Deflagrations (Prevent & reduce emissions from deflagrations)	NA	The site does not undertake treatment of metal waste in shredders or treat WEEE. Given the nature of the waste treatment operations, we agreed that this BAT is not applicable.
BAT 28 - Energy efficiency (Shredder feed stability)	NA	The site does not undertake treatment of metal waste in shredders or treat WEEE. Given the nature of the waste treatment operations, we agreed that this BAT is not applicable.
BAT 29 - WEEE containing VFCs and/or VHCs (Emissions of organic compounds to air including AELs)	NA	The site does not undertake treatment of metal waste in shredders or treat WEEE. Given the nature of the waste treatment operations, we agreed that this BAT is not applicable.
BAT 30 - Explosions when treating WEEE (Prevent emissions due to explosions)	NA	The site does not undertake treatment of metal waste in shredders or treat WEEE. Given the nature of the waste treatment operations, we agreed that this BAT is not applicable.
BAT 31 - Emissions to air (Techniques to reduce emissions to air including AEL)	NC/IC	<p>The operator is committed to ensure that all emissions to air from the installation are free from visible concentrations of dusts, fibres or particulates that are likely to cause pollution of the environment, harm to human health and serious determinant to the amenity of the locality outside the site boundary. All waste operations are taking place within a building to minimise diffuse air pollution. Dust will be managed at point of source, with targeted collection systems being located throughout the plant such as shredder hoods and trommels. Ducts will transfer the extracted air to a centralised bag filter located within the building on an external wall with dust being removed into containers or bags for disposal.</p> <p>There are channelled emissions to air through odour ventilation stacks A1, A2, and A3. We have included an improvement condition IC3 in the permit that requires the operator to carry out an assessment and characterisation of the waste gases released from these stacks. Currently, the emissions are released unabated and there is not enough representative monitoring data available to determine the compliance with BAT-AEL for TVOCs. IC3 requires the operator to submit a written report to the Environment Agency for approval that outlines:</p> <ul style="list-style-type: none"> - Results of at least three monitoring rounds for all odorous compounds (odour profile) during full operation; - Compliance against the BAT-AEL for TVOCs; - The suitability of the current odour control measures for channelled odour emissions from the facility to meet with the requirements of BAT 14d and BAT 31; and

		- any improvements necessary with timescales for implementation.
BAT 32 - WEEE containing mercury (Emissions to air including AEL)	NA	No WEEE is treated onsite.
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.
Reg. 61 Request for Further Information (RFI) Assessment of response received		
List of wastes review	<p>We requested the operator to review the list of wastes in the permit and consider if the wastes highlighted in YELLOW in appendix 1 of this request were still relevant to site's operations. We requested the operator to provide us with a justification if they considered them appropriate for treatment at the facility. We also requested the operator to confirm what percentage of waste accepted and treated at their site consist of biodegradable (high odour risk) waste. The operator responded on 9 December 2021 and stated that although the site does not currently accept all of the highlighted waste types, they wanted to keep them in the permit as they require flexibility due to commercial reasons. The operator also explained that the envisaged future changing regulatory landscape of Extended Producer Responsibility (EPR) and Deposit Return scheme (DRS) has the potential to change the waste market, thus flexibility is required. Furthermore, the operator stated that the waste types were included within the original permit application submitted in 2013 and were deemed as acceptable during the original determination process. If the EWC codes were removed from the permit additional costs, resources and time would be required to re-insert the codes into the permit should they be specifically required at that time. While the facility has a long-term contract with CEMEX, the specification could alter and thus flexibility on the SRF specification may have to be met by altering proportions of waste types into the site. The inclusion of these EWC codes within the permit is not detrimental to the permit conditions or operation of the site. The waste returns provide the Environment Agency with the ability to attain a full picture of the current waste types accepted into the site at a particular time.</p> <p>Although the operator requested that all of the waste types highlighted in yellow should be retained, we have removed the following EWC codes 02 07 02, 10 11 10, 19 04 01, 19 05 02, 20 01 08 and restricted waste codes 02 01 03, 02 01 07, 02 03 02, 02 03 03, 02 03 04, 02 05 01, 02 07 01, 02 07 04, 04 01 08, 04 01 09, 19 05 03, 19 10 04, 19 10 06, 19 13 02 and 20 02 03 to solid combustible waste. We have deemed that these waste codes are not suitable for SRF production. Waste types shall be dry combustible materials with low odour potential.</p>	
Provide details of how you plan to abate the point source/channelled emissions to air from the 3 stacks (emission points A1, A2 and A3) in table S3.1 of permit or if	<p>The operator responded stating that the current site operational practices minimise the risk of odour to surrounding receptors. Any possible retrospective installation of odour abatement equipment at site would be highly costly and has the potential to detrimentally affect the limited operational space available within the building due to the physical size of any such installation. There are therefore currently no plans to provide additional abatement. The "non-hazardous and inert waste: appropriate measures for permitted facilities" guidance allows the demonstration of alternative abatement</p>	

<p>that is not your intention justify this to us.</p>	<p>techniques where equally effective (Paragraph 6.2 – 3), which is demonstrated via both the AMEC odour assessment provided within Appendix A of the Odour Management Plan and the 2021 Initial Odour Modelling Assessment.</p> <p>As currently, the emissions are discharged unabated and there is not enough representative monitoring data available to determine the site is complying with BAT-AEL for TVOCs, we have included IC3 in the permit that requires the operator to submit a written report to the Environment Agency for approval that outlines:</p> <ul style="list-style-type: none"> - Results of at least three monitoring rounds for all odorous compounds (odour profile) during full operation; - Compliance against the BAT-AEL for TVOCs; - The suitability of the current odour control measures for channelled odour emissions from the facility to meet with the requirements of BAT 14d and BAT 31; and - any improvements necessary with timescales for implementation.
<p>Confirm whether you use localised dust extraction systems. And if so, confirm which operations benefit from these systems.</p>	<p>The operator confirmed that the areas of waste treatment that benefit from localised dust extraction/abatement include the waste shredding equipment and conveyor drop zones on the SRF plants. Dust is collected in bags via a reverse jet filter bag house and disposed of at suitable off site waste facilities. We have included process monitoring requirements (Table S3.3) for the bag filters to ensure the efficiency of the bag filter is monitored and maintained.</p>
<p>Confirm how the uncontaminated surface water is discharged to River Avon. Is the discharge via an attenuation lagoon and/or oil interceptor?</p>	<p>The operator confirmed that uncontaminated surface water is discharged to the River Avon via firstly an interceptor and then the attenuation lagoon. A penstock valve (allowing the entire surface water system to be shut off and contained) is also installed downstream from the attenuation lagoon at the point labelled “hydrobrake”. We are satisfied with the response and no further action required.</p>
<p>Confirm whether the vehicles entering and leaving the site are enclosed or covered.</p>	<p>The operator confirmed that all vehicles entering and leaving the site are either enclosed or covered. There is a history of litter pollution around the site and roads leading to the site. To address this, we have included IC5 in the permit which requires the operator to review their litter management plan to ensure that the waste is handled in a manner to prevent litter escape.</p>
<p>Summary of other changes made to the permit as a result of our assessment of the Reg. 61 response</p>	
<p>Change</p>	<p>Reason for change</p>
<p>Condition 2.3.3 and Table S2.1 have been added</p>	<p>Condition 2.3.3 and the associated table S2.1 have been added as they were omitted in error.</p>
<p>Conditions 3.5.1 – 3.5.4 have been added</p>	<p>These conditions were added because there are monitoring requirements in the permit.</p>

Condition 3.7.1 has been added	This condition was added as there is an approved Fire Prevention Plan which has been incorporated in Table S1.2 of the permit but there was no condition relating to fire prevention in the permit.
Conditions 4.2.2 and 4.2.3 have been added	These conditions have been added to the permit as there are reporting requirements in the permit.
Condition 4.3.2 has been amended	This condition has been amended to remove reference to conditions 4.3.1(a)(i) and 4.3.1(b)(ii).
Table S1.1 has been amended	The amendments were made to define the limits of specified activities and to add Directly Associated Activities that were omitted.
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 amendments were made to show IC1 and IC2 completed and add 3 new improvement requirements IC3, IC4 and IC5.
Table S2.2 has been amended	Waste codes 02 07 02, 10 11 10, 19 04 01, 19 05 02, 20 01 08 and 20 02 01 have been removed from Table S2.2 and waste codes 02 01 03, 02 01 07, 02 03 02, 02 03 03, 02 03 04, 02 05 01, 02 07 01, 02 07 04, 04 01 08, 04 01 09, 19 05 03, 19 10 04, 19 10 06, 19 13 02 and 20 02 03 have been restricted to solid combustible waste.
Table S3.1 has been amended	The amendments were made to add monitoring requirements.
Table S3.2 has been amended	The amendments were made to the reference to site plan in Schedule 7 and include oil and grease in monitoring parameters.
Table S3.3 has been added	This table was added to include process monitoring requirements in relation to bag filters.
Tables S4.1 to S4.4 have been added	These tables were added as there are reporting requirements in the permit.
Schedule 5 has been amended	A new paragraph (c) to Part A requiring notification of breach of permit conditions not relating to limits has been added.
Schedule 6 has been amended	This now includes new interpretations associated with the permit review.