Permitting Decisions- Environment Agency Initiated Variation

We have issued an Environment Agency initiated variation for Reclamation Pond Materials Recycling Facility operated by Subcoal Production TSP Ltd following a review of the permit in accordance with Environmental Permitting (England and Wales) Regulations 2016, regulation 34(1).

The variation number is EPR/SP3305PX/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 BATC) 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 08/11/2021.

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.
    - 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.
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 25/02/2022. Additional information was received on the 29/11/2022.

We considered that the response and the additional information did not contain sufficient details for us to commence the 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 13/01/2023 and received their response on the 02/02/2023 and further information on the 15/03/2023.

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 titled ‘Regulation 61 Response and BAT Assessment’, reference OL_21_P044_SUB, dated February 2022.
- Document titled ‘NHI Installations Reg 61 notice – Completed’.
- Document titled ‘SOL_21_P044_SUB_Reg 61 Response I2’, received in response to questions 1 to 14 of the RFI, excluding Annex 2 of the document titled ‘Housekeeping Procedure’.

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 4.3.2 has been amended to reflect the wording of the installation template.
- Condition 4.3.3 has been added because it is a relevant installation condition. 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. Activities AR5 and AR7 have added newly to this table.
- Table S1.2 as referenced in Conditions 2.3.1 and 2.3.2 has been amended to incorporate operating technique 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 incorporate the following changes:
  - IP2 has been added. This requires the operator to submit a revised dust management plan (DMP) to the Environment Agency for approval.
  - IP3 has been added. This requires the operator to submit a revised litter management plan for the site to the Environment Agency for approval.
  - IP4 and IP5 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.
- Table S1.4 of the last variation as referenced in Condition 2.5.1 has been deleted and replaced with a new Table S1.4. The pre-operational condition in Table S1.4 of the last variation is completed. A new pre-operational condition for future development has been added to the replacement table.
- Table S2.2 as referenced in Condition 2.3.3 has been amended by removing waste codes that are not appropriate to the permitted activities.
- Table S3.1 as referenced in Condition 3.5.1 (a) has been amended to include the monitoring of dust at the emission points A4 and A5, together with the BAT AEL.
- Tables S3.3 as referenced in Condition 3.5.1 (b) has been amended to include process monitoring of dust at the NIHOT dust extraction units.
- Table S4.1 as referenced in Condition 4.2.3 has been amended by adding reporting requirements for the new channelled emission points included in Table S3.1.
- Schedule 5 as referenced in Condition 4.3.2 has been amended by adding a new paragraph (c) to Part A requiring notification of breach of permit conditions not relating to limits.
- Schedule 7 as referenced in Condition 2.2.1 has been amended by replacing the site plan with the one that shows the emission monitoring point.

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 an up-to-date written management system that is periodically reviewed.
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 emission points to surface water or sewer from the site but there are channelled emission points to air at the site. In line with the WT BATC, we have included monitoring requirements (parameters and limits) in Table S3.1 of the permit against the channelled emission points to air and have included a restriction in table S1.1 of the permit to indicate that *'there shall be no discharge of wastewater from the site area and/or lagoon to surface water or sewer'*.
BAT 4 - Storage procedures	CC	The operator confirmed that they have storage procedures in place at the site. Details of waste storage procedures are contained in the site's Fire Prevention Plan and addressed under question 5 of the further information received from the operator on the 29/11/2022 and 15/03/2023.
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	NA	There are no emission points to surface water or sewer from the site. In the further information received from the operator on the 15/03/2023, the operator stated that *'…it is key to note that the lagoon is a sealed system that does not directly discharge to controlled waters (W1) unless it pumped. However, the lagoon is managed in a manner that ensures that when it is nearing maximum capacity, it is emptied by tanker and the water transferred off site for disposal'.* We have included a restriction in table S1.1 of the permit to indicate that *'there shall be no discharge of wastewater from the site area and/or lagoon to surface water or sewer'*. We have also included pre-operational condition PO1 in Table S1.4 that states that *'the operator shall not discharge wastewater or runoff water generated within site area and the lagoon into surface water or sewer either via the emission point marked W1 in Table S3.1 or any other point until the operator can demonstrate such waters are clean and uncontaminated by submitting relevant data to the Environment Agency for approval'.*
BAT 7 - monitor emissions to water	NA	There are no emission points to surface water or sewer from the site. In the further information received from the operator on the 15/03/2023, the operator stated that *'…it is key to note that the lagoon is a sealed system that does not directly discharge to controlled waters (W1) unless it*

		pumped. However, the lagoon is managed in a manner that ensures that when it is nearing maximum capacity, it is emptied by tanker and the water transferred off site for disposal'. We have included a restriction in table S1.1 of the permit to indicate that *'there shall be no discharge of wastewater from the site area and/or lagoon to surface water or sewer'*. We have also included pre-operational condition PO1 in Table S1.4 that states that *'the operator shall not discharge wastewater or runoff water generated within site area and the lagoon into surface water or sewer either via the emission point marked W1 in Table S3.1 or any other point until the operator can demonstrate such waters are clean and uncontaminated by submitting relevant data to the Environment Agency for approval'.*
BAT 8 - monitor channelled emissions to air	CC	There are channelled emission points to air at the site. In line with the WT BATC, we have included monitoring requirements (parameters and limits) in Table S3.1 of the permit against the channelled emission points.
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	CC	The operator has an approved Odour Management Plan at the site and there are currently no concerns about odour emissions from the site.
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. The operator stated that *'water usage is recorded using the water meter located at the site entrance gate. Energy usage is recorded daily on the sites production log. The sites energy supplier provides a weekly report on the energy usage of the site, broken down into half hourly readings. Raw material usage and generation of residues is also recorded on the sites production log'.*
BAT 12 - odour management plan	CC	The operator has an approved Odour Management Plan at the site and there are currently no concerns about odour emissions from the site.
BAT 13 - reduce odour emissions	CC	The operator has an approved Odour Management Plan at the site and there are currently no concerns about odour emissions from the site.
BAT 14 - reduce diffuse emissions to air	FC	Although the operator stated that the permitted installation activities are undertaken in building, we noted that the building is totally enclosed. To address the deficiencies, we have included Improvement Conditions IP4 and IP5 in the permit which require the operator to carry out a detailed review of the existing building, 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	NA	The operator stated that *'this BAT requirement is restricted to locations where noise nuisance impacts sensitive receptors – therefore this does not apply'.* Based on our internal noise screening we agreed with the operator a noise impact assessment and noise management plan are not required at this point.
BAT18 - reduce noise and vibration emissions	NA	The operator stated that *'this BAT requirement is restricted to locations where noise nuisance impacts sensitive receptors – therefore this does not apply'.* Based on our internal noise screening we agreed with the operator a noise impact assessment and noise management plan are not required at this point.
BAT 19 - optimise water consumption, reduce wastewater and prevent or reduce emissions to soil and water	CC	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 not discharged to surface water or sewer. We have included a restriction in table S1.1 of the permit to indicate that *'there shall be no discharge of wastewater from the site area and/or lagoon to surface water or sewer'*. While there is an emission monitoring point for surface water collected from the site area that is stored at the lagoon, the permit does not allow discharge of wastewater from the site and/or the lagoon to surface water or sewer. The holding lagoon is regularly monitored to ensure that there is always enough capacity to contain runoff from the site. If the water within the holding lagoon is nearing appropriate capacity, the lagoon waters will be tankered off-site for disposal to a suitable treatment facility.
BAT 20 - waste water treatment	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 not discharged to surface water or sewer. We have included a restriction in table S1.1 of the permit to indicate that *'there shall be no discharge of wastewater from the site area and/or lagoon to surface water or sewer'*. There is therefore no need for wastewater treatment at the site.
BAT 21 - prevent or limit the environmental consequences of accidents and incidents	CC	The operator has an approved Accident Management Plan. The operator stated that '*the management of accidents is detailed in the sites Accident Management Plan. Due to the design of the site, any emissions from spillages or firefighting water will be contained on site'.* They also stated

		that *'Subcoal operate an incident management system where all accidents etc are logged and assessed'.*
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 stated that *'the site does not currently have an energy efficiency plan and energy balance record. This is not considered necessary as all plant is controlled and operated by PLC and optimised automatically. Energy is a key parameter and aspect of the company's financial and operational cost management processes and therefore not considered to require a separate management plan'*.
BAT 24 - maximise reuse of packaging	NA	No packaging is generated during the waste process operations. Given the nature of the waste treatment operations, we agreed that this BAT is not applicable.
BAT 25 - General - Emissions to air (Techniques to reduce plus AEL for dust).	CC	There are channelled emission points to air at the site. In line with the WT BATC, we have included monitoring requirements for dust in Table S3.1 of the permit against the channelled emission points.
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	The installation is for the mechanical processing of non-hazardous waste for the production of SRF and RDF.

		There are channelled emission points to air at the site. In line with the WT BATC, we have included monitoring requirements for dust in Table S3.1 of the permit against the channelled emission points.
BAT 32 - WEEE containing mercury (Emissions to air including AEL)	NA	WEEE is not being treated at the site.
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**	
Review the activities in your current permit and ensure that the relevant treatment activities are clearly identified and included in the permit.	After reviewing the response from the operator and after considering the provisions of the RGN 2 guidance, we agreed with the operator that the waste drying operation is an integral part of the S5.4 A(1)(b)(ii) - pre-treatment of waste for incineration or co-incineration.	
Review the list of wastes in Table S2.2 of your permit and consider if the wastes highlighted in YELLOW in appendix 1 of this request are still relevant to your site's operations.	The operator in their initial response received on the 02/02/2023 indicated that they are happy to remove the waste codes highlighted in YELLOW. However, they requested that these two codes (15 01 14 and 17 09 04) should be retained. Following further discussion we had with the operator, it was agreed that we will retain 17 09 04 code but not 15 01 14. In summary, the operator agreed that the following EWC codes should be removed from Table S2.2: 02 01 10, 15 01 04, 15 01 07, 17 04 01, 17 04 02, 17 04 03, 17 04 04, 17 04 05, 17 04 06, 17 04 07, 17 04 11, 17 09 04, 19 10 01, 19 10 02, 19 10 04, 19 10 06.	
Provide details of your wastewater management and monitoring plans for the site. as required under BATs 3 and 5.	The bale storage area has a separate bund which is sealed and provides secondary containment. Any wastewater that is captured within this containment area is collected and tankered offsite for disposal. This area was constructed to isolate the baled storage area from the site surface water drainage system to ensure that no potentially contaminated runoff is discharged to the onsite containment lagoon. Although it is acknowledged that due to site constraints, waste pellets are now being transferred and loaded externally and therefore creating the potential for contaminated runoff from the external hardstanding to enter the lagoon, it is key to note that the lagoon is a sealed system that does not directly discharge to controlled waters (W1) unless it pumped. However, the lagoon is managed in a manner that ensures that when it is nearing maximum capacity, it is emptied by tanker and the water transferred off site for disposal. There are no emission points to surface water or sewer from the site.	

Provide a copy of your litter and housekeeping procedure.	The operator submitted litter and housekeeping procedure, but we did not accept the procedure as submitted. We have included Improvement Condition IP3 in the permit which requires the operator to submit a revised litter management plan.
Provide additional information to show that your waste storage procedure is in line with BAT 4 of the WT BATC.	The operator confirmed that *'on-site waste storage is optimised as far are technically possible, with external waste storage limited to the storage of sealed bale within a sealed external storage area. All incoming waste and products are stored within the main processing building. The external storage of wrapped bales prevents the risk of material blowing off site and is managed to ensure that all waste bales remain in good condition and are not subject to damage or degradation. Inspection of the SRF bale storage area is carried out as part of the daily checks on site. If any damaged bales are identified during the checks, they will be taken back in the building and rewrapped'.* The operator indicated that they are currently in discussions with the Planning Authorities to increase the size of the building on site to allow for the complete enclosure of all pellet storage and loading operations. We have included Improvement Conditions IP4 and IP5 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 and identify on a site layout plan, the locations of all of the channelled emission points associated with your site operations together with information on the pollutant of concern being release from each of the emission points.	The operator provided a revised site plan which showed the locations of the air emission points. This plan is incorporated in Schedule 7 of the permit
Provide details of systems and measures you have in place to ensure that your site is meeting the requirements of BAT 11 of the WT BATC with regards to the monitoring of annual consumption of water, energy, raw materials, the annual generation of residues and wastewater.	The operator stated that '*water usage is recorded using the water meter located at the site entrance gate. Energy usage is recorded daily on the sites production log. The sites energy supplier provides a weekly report on the energy usage of the site, broken down into half hourly readings. Raw material usage and generation of residues is also recorded on the sites production log. Wastewater is not produced by the plant and just relates to the potentially contaminated runoff from the hardstanding. Whenever water is tankered off site for removal it is also recorded on the site's productions log. The production log is reviewed and monitored every Tuesday during the sites weekly review meetings'*.

Provide details of how your site is designed and laid out to meet the requirements of BAT 14 of the WT BATC.	Although the operator indicated that the waste treatment and storage (other than storage of wrapped bales are taking place within the building, it was evident from the response that the building is not fully enclosed. We have included Improvement Conditions IP4 and IP5 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.
Review your building design and confirm that it is suitable to meet the requirements outlined in Sections 6.2 and 6.3 of the Non-hazardous and inert waste: appropriate measures for permitted facilities e.g. Is the building fully enclosed? Is it maintained under negative pressure? Do you have local extraction systems on treatment units and emission points?	Same as above.
Identify clearly the measures that you have in place to ensure that the use of water and generation of wastewater is minimalised at the site.	Although the operator indicated that wastewater is not produced by the facility, it was evident that potentially contaminated runoff is generated within the site area. We have also included pre-operational condition PO1 in Table S1.4 that states that the operator shall not discharge wastewater or runoff water generated within site area and the lagoon into surface water or sewer either via the emission point marked W1 in Table S3.1 or any other point until the operator can demonstrate such waters are clean and uncontaminated by submitting relevant data to the Environment Agency for approval.
Provide information on the nature and quantity of contaminated runoff/wastewater that you are discharging from the site.	Same as above.
Provide details of the systems that you have in place for separate handling and/or treatment of clean water from contaminated waters.	The operator stated that all potentially contaminated waters from the external yard is contained and tankered off site for treatment and that rainwater from the roof is channelled to drain via a French drain to the local geology.

Provide reasons on why you considered the use of interceptor alone as an appropriate treatment technique for the wastewater.	The operator stated that *'The interceptor is appropriate treatment for clean runoff from the external hardstanding however it is acknowledged the current practice of external pellet loading compromises this position. All surface water runoff from the external hardstanding is captured by the site drainage systems and discharged to the sealed surface water lagoon. All water contained within the lagoon is tankered off site for disposal and therefore is not subject to onsite treatment'.* We have also included pre-operational condition PO1 in Table S1.4 that states that the operator shall not discharge wastewater or runoff water generated within site area and the lagoon into surface water or sewer either via the emission point marked W1 in Table S3.1 or any other point until the operator can demonstrate such waters are clean and uncontaminated by submitting relevant data to the Environment Agency for approval.
Review your responses to BATs 18, 19, 21, 23 and 25 and provide additional information in support of your chosen answers where necessary.	The responses provided against these BATs are considered acceptable and are detailed in the response received from the operator on the 02/02/2023 and 15/03/2023.