

Permitting Decisions - Environment Agency Initiated Variation

We have issued an Environment Agency initiated variation for Landor Street Integrated Resource Recovery Centre operated by SUEZ Recycling and Recovery UK 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/BB3236AY/V004.

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 08/04/2022.

We considered that the Regulation 61 notice response 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 03/05/2023 and received their response on the 15/06/2023.

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:
 - 20220407 - Landor Street - Reg 61 response.
 - 20220407 Landor Street - Reg 61 Notice.
 - 20220407 Landor Street - Annex 1 Reg 61 Notice.
 - Landor St - Non-technical summary 07.04.2022.
 - Waste Storage Plan dated April 2022.
 - Waste Storage Plan v2.1.
 - Residues Management Plan dated April 2022.
 - Landor Street IRRRC - MRF Process 02.02.2022.
- Document titled '*Landor St Sch.5 response - 15.06.23*', received in response to questions 1 to 12 of the RFI.
- Documents received in response to the draft permit review:
 - Lrs-PER-0723-01-A3 - Permit Boundary & Emissions Points, showing correct permit boundary and channelled emission points (S1, S2, F1 and D1).

- Documents received in response to the draft permit review:
 - Operations and Emissions Plan (September 2023).

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 and the additional information received in response to the request further information, we have made the following changes to the permit conditions:

- Condition 2.5 has been deleted because the restrictions that relate to WEEE are now included in Table S1.1.
- Condition 3.1.1 has been amended to include reference to Table S3.3.
- Condition 3.1.2 has been added to specify that the limits included within schedule 3 should not be exceeded. The follow-on condition has been renumbered.
- Condition 3.5.1 has been amended to include reference to Table S3.3.
- Condition 3.5.4 has been amended to include reference to Tables S3.2 and S3.3.
- Condition 4.2.3 has been added because it is a relevant installation condition. The follow-on conditions have been renumbered accordingly.
- Condition 4.4.3 has been deleted and consolidated with Condition 4.4.2 as they are duplicate versions of each other.
- 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.
- 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 2.6.1 has been amended by adding improvement conditions IC3 – IC8.
- Tables S2.2 and S2.3 as referenced in Condition 2.3.3 have been amended by removing waste codes that are not appropriate to the permitted activities.
- Table S3.1 as referenced in Conditions 3.1.1, 3.5.1 (a) and 3.5.4 has been added to include the monitoring of dust emissions, together with the BAT AEL for emissions to air. The follow-on tables have been renumbered.
- Table S3.3 as referenced in Conditions 3.1.1, 3.5.1 (a) and 3.5.4 has been amended to include the appropriate monitoring parameters and BAT AELs for emissions to sewer. The follow-on tables have been renumbered.
- Table S4.1 as referenced in Conditions 4.2.3 (a) and 4.2.3 (b) has been added for appropriate reporting requirements for channelled emissions to air and sewer. The follow-on tables have been renumbered.

- Table S4.4 as referenced in Condition 4.2.2 (c) and 4.2.3 (b) has been amended by adding the appropriate reporting forms for channelled emissions to air and sewer.
- Schedule 5 as referenced in Conditions 4.3.2 and 4.3.4 has been amended by adding a new paragraph (c) to Part A requiring notification of breach of permit conditions not relating to limits.
- Schedule 6 as referenced in condition 4.4.1 has been amended by adding additional interpretations that are relevant to the changes that have been made as a result of this variation.
- 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
General management appropriate measures	CC	SUEZ is accredited to ISO14001. A summary of the site management systems is available. The site management system includes a document titled Staff Competency and Training Records, Environmental Risk Assessment and Accident Management Plan, Business Continuity and Contingency Plan and Decommissioning Plan.
Waste pre-acceptance, acceptance and tracking appropriate measures	FC	The operator confirmed that they are currently complying in part with the requirements of the appropriate measures in this section. They indicated that they are currently not complying with Section 3.2, para 11 as it relates to the improvements to site surfacing. There is an improvement condition (IC2) in the permit which requires the operator to submit a written infrastructure improvement plan to the Environment Agency for approval, together with details of the implementation plans. The site has a system equivalent to the electronic system which makes use of a variety of visual, weighbridge and electronic tool systems to ensure effective tracking of waste.
Waste storage, segregation and handling appropriate measures	CC	The operator confirmed that they currently meet the requirements of the appropriate measures in this section. The operator submitted a document titled Site Operations Plan and Waste Storage Plan which provides details of the site’s waste storage and handling operations.
Waste treatment appropriate measures	CC	The operator confirmed that they currently meet the requirements of the appropriate measures in this section. The appropriate measures for the site’s treatment operations are detailed in the following documents - Operations and Emissions Plan, Waste Storage Plan, Fire Prevention Plan, Process/System Flow Diagram (attached), Operations and Maintenance Procedures, Environmental Risk Assessment, Accident Management Plan and EMS system.
Emissions control appropriate measures	FC	The operator provided details of the emission control measures within the Environmental Risk Assessment and Operations and Emissions Management Plan. The site operations (other than external storage) are undertaken within the existing building at the site. The operator confirmed that the building integrity checks have not been undertaken; however, they indicated that there have been no historic compliance issues associated with integrity defects. We have included an improvement condition, IC3, which requires the operator to carry out a detailed review of the existing buildings and infrastructure in the building 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.

		An emission inventory and a description of localised dust extraction is included within the Operations and Emissions Management Plan. Mitigation measures were also described within the Environmental Risk Assessment. Although the operator submitted Fire Prevention Plan, Noise Management Plan etc., these management plans have not been reviewed or approved as part of this variation.
Emissions monitoring and limits appropriate measures	FC	The operator confirmed that there are channelled emission points to air and sewer at the site. In line with the WT BATC, we have included monitoring requirements (parameters and limits) in Table S3.1 for emission to air, and a list of parameters to be monitored in Table S3.3 of the permit, together with Improvement Conditions IC9 – IC11 which require the operator to monitor and carry out a H1 assessment for emission to sewer. The emission to sewer is derived from the areas of the site that are used for Waste Operation activities only. While there is a need for emission monitoring of discharge to sewer, we have considered that the BAT AELs are not applicable.
Raw Material, Process efficiency and Water Use appropriate measures	CC	The operator confirmed that they currently meet the requirements of the appropriate measures. The operator confirmed that raw materials as described in the BAT conclusions are not used in the process. The process does not use water. Annual energy use recording and reporting is a requirement of current permit under condition 4.2.2 and detailed in the site's Energy Efficiency Plan.

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 is accredited to ISO14001. A copy of ISO14001 certificate was provided.
BAT 2 - Waste pre-acceptance, acceptance and tracking appropriate measures	CC	The operator confirmed that they have procedures for waste pre-acceptance and acceptance, including waste tracking which is managed via the electronic materials management (MM) system.
BAT 3 - Inventory of wastewater and waste gas streams	FC/CC	There are channelled emission points to air and sewer from the site. The operator indicated that dust is the main emission of concern for channelled emissions to air but did not provide the inventory of wastewater. In line with the WT BATC, we have included monitoring requirements (parameters and limits) in Table S3.1 for emission to air, and a list of parameters to be monitored in Table S3.3 of the permit, together with Improvement Conditions IC9 – IC11 which require the operator to monitor and carry out a H1 assessment for emission to sewer. The emission to sewer is derived from the areas of the

		site that are used for Waste Operation activities only. While there is a need for emission monitoring of discharge to sewer, we have considered that the BAT AELs are not applicable.
BAT 4 - Storage procedures	CC	The operator confirmed that they have storage procedures in place at the site. Details of the waste storage procedures are contained within the Fire Prevention Plan - section 3.2 and 3.3, Waste Storage Plan and the Operations and Emissions Management Plan.
BAT 5 – Waste handling and transfer procedures	CC	The operator confirmed that they have waste handling and transfer procedures in place. Details of the waste handling arrangements are contained within the Fire Prevention Plan - section 3.2 and 3.3, Waste Storage Plan, Operations and Emissions Management Plan, Environmental Risk Assessment and Accident Prevention & Management Plan.
BAT 6 - monitor key process parameters	FC	The operator indicated that this BAT is not applicable because <i>no process wastewater produced</i> . All waste handling, storage and treatment operations associated with the installation activities are undertaken inside the building. The wastewater is generated from the areas of the site that are used for Waste Operation activities only. As such we have included monitoring requirements (parameters and limits) in Table S3.1 for emission to air, and a list of parameters to be monitored in Table S3.3 of the permit, together with Improvement Conditions IC9 – IC11 which require the operator to monitor and carry out a H1 assessment for emission to sewer. While there is a need for emission monitoring of discharge to sewer, we have considered that the BAT AELs are not applicable.
BAT 6 - monitor key process parameters	FC	Although the operator indicated that this BAT is not applicable because <i>no process wastewater produced</i> , we have considered that it is applicable because contaminated water is generated within the waste storage area and is discharge to sewer. The wastewater is generated from the areas of the site that are used for Waste Operation activities only. As such we have included monitoring requirements (parameters and limits) in Table S3.1 for emission to air, and a list of parameters to be monitored in Table S3.3 of the permit, together with Improvement Conditions IC9 – IC11 which require the operator to monitor and carry out a H1 assessment for emission to sewer. While there is a need for emission monitoring of discharge to sewer, we have considered that the BAT AELs are not applicable.
BAT 8 - monitor channelled emissions to air	CC	There is a channelled emission point 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 for the 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. The site does not recover solvents and therefore has no diffuse emissions from these sources. This BAT is therefore considered not applicable.

BAT 10 - monitor odour	FC	The operator indicated that ' <i>odour nuisance at sensitive receptors is not expected and has not been substantiated</i> '; however, they submitted an odour management plan which has not been assessed as part of this variation. We have included an improvement condition, IC5, which requires the operator to submit a revised Odour Management Plan (OMP) to the Environment Agency for written approval.
BAT 11 - monitor consumption of water, energy and raw materials, and generation of residues and wastewater	CC	A 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 ' <i>annual consumption of water, energy and raw materials and the annual generation of residues and wastewater is monitored by SUEZ and reported to EA</i> '.
BAT 12 - odour management plan	FC	The operator indicated that ' <i>odour nuisance at sensitive receptors is not expected and has not been substantiated</i> '; however, they submitted an odour management plan which has not been assessed as part of this variation. We have included an improvement condition, IC5, which requires the operator to submit a revised Odour Management Plan (OMP) to the Environment Agency for written approval.
BAT 13 - reduce odour emissions	FC	The operator indicated that ' <i>odour nuisance at sensitive receptors is not expected and has not been substantiated</i> '; however, they submitted an odour management plan which has not been assessed as part of this variation. We have included an improvement condition, IC5, which requires the operator to submit a revised Odour Management Plan (OMP) to the Environment Agency for written approval.
BAT 14 - reduce diffuse emissions to air	FC	The operator provided details of the emission control measures within the Environmental Risk Assessment and Operations and Emissions Management Plan. Site operations (other than external storage) are undertaken within the existing building at the site. The operator confirmed that the building integrity checks have not been undertaken; however, they indicated that there have been no historic compliance issue associated with integrity defects. We have included an improvement condition, IC3 which requires the operator to carry out a detailed review of the existing buildings and infrastructure in the building, 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. Although the operator submitted a Fire Prevention Plan, a Noise Management Plan etc. These management plans have not been reviewed or approved as part of this variation.
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	FC	A Noise Impact Assessment and Noise Management Plan are required as part of improvement condition IC1. Although these were submitted with and in response to the Regulation 61 Notice, they have not been assessed or approved as part of this variation. We have updated the compliance date for the improvement condition to allow time for the documents to be reviewed.
BAT18 - reduce noise and vibration emissions	FC	A Noise Impact Assessment and Noise Management Plan are required as part of improvement condition IC1. Although these were submitted with and in response to the Regulation 61 Notice, they have not been assessed or approved as part of this variation. We have updated the compliance date for the improvement condition to allow time for the documents to be reviewed.
BAT 19 - optimise water consumption, reduce wastewater and prevent or reduce emissions to soil and water	CC	The operator indicated that this BATc is not applicable because no process wastewater produced. All waste handling, storage and treatment operations are undertaken inside the building. The wastewater is generated from the areas of the site that are used for Waste Operation activities only. As such we have included monitoring requirements (parameters and limits) in Table S3.1 for emission to air, and a list of parameters to be monitored in Table S3.3 of the permit, together with Improvement Conditions IC9 – IC11 which require the operator to monitor and carry out a H1 assessment for emission to sewer. While there is a need for emission monitoring of discharge to sewer, we have considered that the BAT AELs are not applicable.
BAT 20 - waste water treatment	CC	Although the operator indicated water is not used, and that wastewater is not generated as part of the SRF treatment processes; it is evident however, that contaminated waters are generated within the site area. The contaminated waters that are generated within the site area are discharged to sewer. The wastewater is generated from the areas of the site that are used for Waste Operation activities only. As such we have included monitoring requirements (parameters and limits) in Table S3.1 for emission to air, and a list of parameters to be monitored in Table S3.3 of the permit, together with Improvement Conditions IC9 – IC11 which require the operator to monitor and carry out a H1 assessment for emission to sewer. While there is a need for emission monitoring of discharge to sewer, we have considered that the BAT AELs are not applicable.
BAT 21 - prevent or limit the environmental consequences of accidents and incidents	CC	The operator has an Accident Management Plan in place at the site as part of their EMS. The accident management measures are contained in the Environmental Risk Assessment and Accident Prevention & Management Plan.
BAT 22 - substitute materials with waste	NA	The operator indicated that ' <i>raw materials as described in the BAT conclusions are not used in the process</i> '. There is limited use of raw materials as part of the installation activities. Given the nature of the waste treatment operations, we agreed that this BAT is not applicable.

BAT 23 - Energy efficiency plan, energy balance record	CC	The operator has an Energy Efficiency Plan and has stated that ' <i>annual energy use is a requirement of current permit conditions</i> '. We agree that this is sufficient to meet the requirements of this BAT conclusion.
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 is a channelled emission point 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 for the channelled emission point.
BAT 26 - Metal shredders (Reduce accidents & incidents)	NA	The installation is for the mechanical processing of non-hazardous waste for the production of SRF. 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. 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. 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. There is a channelled emission point 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 point.
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 treatment activity as mechanical treatment.

Reg. 61 Request for Further Information (RFI)	Assessment of response received
<p>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 relevant to your site's operations.</p>	<p>The operator stated that whilst they may not currently accept these specific waste types into the site, they indicated that they would not like to see the majority of the EWC codes highlighted in yellow removed from their existing permit conditions.</p> <p>Nonetheless the operator indicated that they are happy for the following EWC codes 02 02 03, 19 05 02, 10 11 10, 20 01 02, 20 01 08, 20 01 41, 20 02 01 to be removed from Table S2.2; 20 01 08 from Table S2.3; and 13 07 01*, 13 07 02*, 13 07 03* from Table S2.4.</p> <p>The operator also indicated that they are happy for the following EWC codes: 02 03 02, 02 03 03, 02 05 01, 02 06 02, 02 07 01, 02 07 02, 19 05 03 to be restricted to 'solid combustible waste only'.</p> <p>As part of the draft permit review, we have also agreed with the operator to remove 16 01 03 from the permit.</p> <p>We agreed to add to the permit the following waste codes that were previously accepted to the under the exempt waste 191202 - ferrous metal, 191203 – Non ferrous metal, 191204 – plastics, 191205 – glass, 191207 – wood, 160601 – batteries.</p>
<p>Provide details of your wastewater and waste gas inventories and monitoring plans as required under BATs 3, 6 and 7.</p> <p>Provide information on the nature and quantity of contaminated runoff/wastewater that you are discharging from the site.</p>	<p>The operator stated that <i>'the response provided on 7 April 2022 was provided on the understanding that BAT conclusions 3, 6, and 7 were relevant only to channelled emissions relating solely to the installation activity undertaken at site i.e., the processing of waste during the SRF production activity, rather than the facility as a whole which also includes the MRF and Transfer Station activities. Within the Operations and Emission Plan – section 4.1 provides the emissions inventory for the whole site, now detailing emission point S1 to sewer and D1 to air. Additional detail on the recently installed dust extraction system is provided within the Dust and Particulates Management Plan'</i>.</p> <p>There was lack of clarity on the drainage arrangements at the site. The drainage information was updated further following the review of the draft permit.</p>
<p>Provide a copy of your pest management procedure</p>	<p>Section 4.8 of the Operations and Emissions Plan has been updated to refer to the site-specific Pest Management Plan. The operator provided a copy of the Pest Management Plan, we reviewed this document and considered it to be inadequate. We have included improvement condition IC8 which requires the operator to submit a revised Pest Management Plan (PMP) to the Environment Agency for approval.</p>
<p>Provide additional information to show that your waste storage procedure is in line with BAT 4 of the WT BATC.</p>	<p>The operator indicated that BAT 4c details that "wastes known to be sensitive to heat, light, air, water, etc. are protected from such ambient conditions". Again, they stated that the Waste Storage Plan details the waste types that are stored externally and that any externally stored wastes will be removed from site within 72 hours.</p> <p>Notwithstanding the view of the operator, there were concerns that the external area is not completely impermeable and that this area of the site may not benefit from sealed drainage system. As such, we have updated the improvement condition IC2 which requires the operator to submit for approval by the Environment Agency, a written</p>

	infrastructure improvement plan and to implement the agreed measures in accordance with the Environment Agency's written approval.
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 pollutants of concern you are release from each of the emission points.	Section 4.1 of the Operations and Emission Plan contains information on the channelled emission points - F1 for emissions to sewer and D1 for emissions to air. The locations of the channelled emission points are shown on the updated site layout drawing titled "Permit Boundary & Emissions Points" which was updated further as part of the draft permit review. The updated version of the site layout plan is included in Schedule 7 of the permit.
Provide details of how your site is designed and laid out to meet the requirements of BAT 14 of the WT BATC especially with regards to: <ul style="list-style-type: none"> - Minimisation of the number of potential diffuse emission sources. - Containment, collection and treatment of diffuse emissions. - Containment and capturing of dust within the shredder and the treatment building. - Cleaning of waste treatment and storage areas. 	<p>The operator updated Section 4.5 of the Operations and Emissions Plan to refer to the site-specific Dust Management Plan (DMP) and attached the Landor Street Dust Management Plan dated May 2023. We have not reviewed or approved the DMP as part of this permit review programme. There were no details from the operator to demonstrate that the site is designed and laid out to meet the requirements of BAT 14 of the WT BATC. As such, we have included in the permit improvement conditions IC3 and IC4 which require the operator to carry out a detailed review of the existing buildings and to submit a written report to the Environment Agency for approval outlining the results of the review and measures and procedures that are in place in the buildings to prevent and/or reduce fugitive emissions of dust, odour and noise.</p> <p>We have also included Improvement Condition IC6 and IC7 which requires the operator to review and updated their DMP and FPP respectively.</p>
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?	<p>The operator stated that <i>'To minimise diffuse emissions, all waste processing is undertaken inside the main site building. The main site building is fully enclosed and includes localised exhaust ventilation (LEV). The site management system now includes updated site-specific management plans for noise, pests and dust. The updated Operations and Emissions Plan (June 2023) now includes reference to the specific management plans for fire, odour, dust, noise and pests'</i>. We</p> <p>The operator updated Section 4.5 of the Operations and Emissions Plan to refer to the site-specific Dust Management Plan (DMP) and attached the Landor Street Dust Management Plan dated May 2023. We have not reviewed or approved the DMP as part of this permit review programme. There were no details from the operator to demonstrate that the site is designed and laid out to meet the requirements of BAT 14 of the WT BATC. As such, we have included in the permit improvement conditions IC3 and IC4 which require the operator to carry out a detailed review of the existing buildings and to submit a written report to the Environment Agency for approval outlining the results of the</p>

	review and measures and procedures that are in place in the buildings to prevent and/or reduce fugitive emissions of dust, odour and noise.
Provide a copy of the Noise Impact Assessment (NIA) and Noise Management Plan (NMP).	The operator provided a copy of the NIA (Ref Suez Landor St SRF Noise Impact Assessment 2022 06 20), and the NMP (the Landor Street Noise Management Plan June 2023). We have not reviewed or approved the NIA and NMP as part of this permit review programme. We have updated the compliance date of the existing improvement condition, IC1 to a future date to enable the local Environment Agency office to review/assess the NIA and NMP.
Provide details of the systems that you have in place for separate handling and/or treatment of clean water from contaminated waters.	<p>The operator updated Section 4.2 of the Operations and Emissions Plan which specified that there are two drainage systems for the site as described below:</p> <ul style="list-style-type: none"> • The majority of the external areas of the site drain to a surface water system. The surface water system serves all site roadways and run off from building roofs and includes a system of gullies. The gullies lead to sealed tanks that are regularly emptied via external tanker. There is an interceptor on site. • The foul drainage system serves the main transfer station building and will serve the areas of proposed additional impermeable surfacing including the external glass storage bay in addition to the existing vehicle wash bay. Penstock valves will be installed on the discharge points to ensure any contaminated water can be retained on site if required. • The foul system also takes domestic effluent from the weighbridge office. • The site has a Severn Trent trade effluent consent
Provide details of the treatment techniques you are using to treat contaminated waters prior to discharge.	The operator confirmed that contaminated water that leaves the site via the foul water system is not treated prior to leaving the site at point F1. Surface waters that enter the gully system and sealed tanks are removed from site via external tanker and disposed of to a suitably permitted facility.
Provide details on how your site is meeting the energy efficiency requirements outlined under BAT 23 of the WT BATC	The operator provided a copy of the energy efficiency plan (the Landor Street Energy Efficiency Plan June 2023) which we considered to be adequate.