

Permitting Decisions - Environment Agency Initiated Variation

We have issued an Environment Agency initiated variation for Cledford Lane Environmental Hub operated by ANSA Environmental Services 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/DP3435RJ/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 06/04/2022.

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 12/06/2023 and received their response on the 30/06/2023 and 16/08/2023 and additional information on the 20/09/2023 and 07/11/2023.

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:
 - NHI Installations Reg 61 notice - Annex 1 tranche 2 29 March 22
 - Non-Technical Description.
 - BAT 05B - 4.2.5 Waste Treatment Procedure - WTS-RD.
 - BAT 05C - 4.2.4 Waste Treatment Procedure - WTS-Recycling.
- Response to the RFI titled 'Response to Regulation 61 Final June 23' excluding response to question 3 of the notice but including documents titled:
 - 'Appendix XII Odour Control – Camfil Ltd_Commissioning Details RDF Building Plant'.
 - 'Appendix XIV BAT 14A - Dust Management Procedure'.
- Document received in response to the draft permit review including, the document titled 'Appendix IV EWC Codes' that provides information on new EWC codes to be added to the permit.
- Document received in response to the draft permit review including, the document titled 'Cledford Lane Permit Area incl External Storage (PT7) 03.11.23' and '4.2.3 Waste Storage Procedure 03.11.2023 V5'.

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:

- Conditions 2.1.1 – 2.1.5 of the previous variation have been deleted and replaced with Conditions 2.1.1 and 2.1.2 of this variation to reflect the wording of the Installation template.
- Conditions 2.3.1 and 2.3.2 of the previous variation have been deleted and replaced with Condition 2.3.1 of this variation to reflect the wording of the Installation template.
- Condition 2.3.8 of the previous variation has been deleted. The relevant restrictions have been incorporated to Table S1.1.
- Condition 2.4.1 of the previous variation has been deleted to reflect the fact that the site is now operational and that pre-operational conditions are no longer required.
- Conditions 2.4.1 and 2.4.2 have been added to implement the improvement programmes associated with this variation.
- 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. Activity AR4 and AR6 have been added newly to the table. The follow-on activity references have been renumbered.
- Table S1.1a of the previous variation has been deleted and incorporated into activity AR7 of Table S1.1.
- 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 added to implement the improvement conditions IC1 – IC5.
- Tables S2.2 and S2.3 as referenced in Condition 2.3.4 have been amended by removing waste codes that are not appropriate to the permitted activities.
- Table S2.4 of the previous variation has been deleted together with the activity in Table S1.1.
- Table S3.1 as referenced in Conditions 3.1.1, 3.5.1 (a) and 3.5.4 has been amended to include monitoring of dust at the emission points A1 and A2, together with the BAT AEL.
- Table S3.2 as referenced in Conditions 3.1.1, 3.5.1 (a) and 3.5.4 has been amended to include reference to the appropriation emission monitoring point and monitoring of oil and grease.

- 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.
- Table S4.1 as referenced in Condition 4.2.3 has been amended by adding reporting requirements for the new channelled emission to air and sewer.
- Table S4.2 as referenced in Condition 4.2.2 (b) has been amended to include annual production/treatment reporting for Refuse Derived Fuel (RDF) produced, ferrous metal, non-ferrous metal and other fractions recovered.
- Tables S4.3 and S4.4 as referenced in Condition 4.2.2 (c) have been updated.
- 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 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 points.

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	The following documents were submitted by the operator to demonstrate that they have a robust management system: BAT 01 - ISO 14001 certificate, BAT 01B -Environmental Policy, BAT 01A- Org Chart, BAT 01C- 5 Year Forecast EA, BAT 05A- Training Matrix, BAT 01G - MP 11 Communications procedure, BAT 01H - ANSA Our Communications, BAT 01F - Business change impact assessment, BAT 010- Site plan shows the size of facilities to tip, sort and treat the waste, location of the fast-action roller-shutter doors (FARSD), emergency exits, spill kits and stack emission points from the dust and odour abatement equipment; BAT 19A - Drainage plan, BAT 21 - Fire Action Plan, BAT 10 - Odour Management Plan, BAT 14A - Dust Management Procedure and BAT 21A - Accident Management Plan.
Waste pre-acceptance, acceptance and tracking appropriate measures	CC	The operator submitted documents titled ‘BAT 02A pre-acceptance process flow’, ‘BAT 02F-Mixed recycling information sheet for trade waste customers’, B’AT 02E-Terms and Conditions for Trade Waste customers (point 3)’ and ‘BAT 02H - Household Campaigns Flyer’, ‘BAT 02B- waste acceptance procedure’, ‘BAT 04A -waste storage procedure’, and BAT 02D- weighbridge procedure to demonstrate that they have appropriate waste pre-acceptance, acceptance and tracking procedures.
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 BAT 04A - waste storage procedure, BAT 05B - 4.2.5 Waste Treatment Procedure - WTS-RDF, BAT 05C - 4.2.4 Waste Treatment Procedure - WTS-Recycling, BAT 05D - 4.4.2 Spill Response Procedure, BAT 01D - 3.2 Environmental Risk Assessment and BAT 02D - 4.2.7 Weighbridge Procedure" which provide 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 - BAT 05B - 4.2.5 Waste Treatment Procedure - WTS-RDF and BAT 05C - 4.2.4 Waste Treatment Procedure - WTS-Recycling among other documents.
Emissions control appropriate measures	CC	The operator indicated that most waste activities are taking place in enclosed buildings designed to reduce noise, dust and odour emissions. They included documents titles ‘BAT 14A - Dust management procedure’, ‘BAT 10 - Odour management plan and BAT 18A - Sound insulation specification for building fabric and BAT 31 - Camfil Operational Information to highlighted some of the emission control measures.

		<p>The buildings also benefit from odour abatement equipment which utilises adsorption to remove odour by adhering potentially odorous particles to the activated carbon media contained within the equipment (Please see BAT 31 Camfil Operational Information). The abatement system maintains the building under an adequate negative pressure to ensure air is retained within the buildings and enters the treatment system via the ducting throughout the building.</p> <p>The odour abatement equipment also filters out airborne dust into sealed drums which are emptied on a regular basis. Dust is removed from the air by passing emissions through a pre-filter and then through a series of large hemipleat filters made of a blend of cellulose and polyester fibres. These filters are then periodically cleaned with automatic blasts of compressed air which forces the dust to drop under gravity.</p> <p>The equipment is maintained and serviced as per manufacturer specifications.</p> <p>The building is assessed for damage on a regular basis and is equipped with fast action roller shutter doors. These doors are available and in use to prevent the escape of odours.</p> <p>Although the operator indicated that no treatment is undertaken on site which would produce waste gases or wastewater streams, it has been identified that the emissions of odour, dust and surface water discharge is inherent in the site operation. However, we acknowledge that the building and the site drainage system are in good condition and as such we have not included Improvement Condition that requires a review of the infrastructure inside or outside of the building.</p> <p>However, we have included Improvement Condition IC1 in the permit which requires the operator to submit a Dust Management Plan (DMP) to the Environment Agency for approval. The DMP shall take into consideration the risk of dust pollution associated with the permitted site operations especially as it relates to the external waste storage and handling operations.</p>
<p>Emissions monitoring and limits appropriate measures</p>	<p>FC</p>	<p>The operator indicated that monitoring of air emissions is not applicable to this site but confirmed that there are channelled emissions to sewer from the site. Based on our knowledge of the site, we have considered that there are channelled emission points to air at the site (via the odour/dust abatement units). As such in line with the WT BATC, we have included monitoring requirements and limits for dust 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 IC3 – IC5 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.</p> <p>We have also included Improvement Condition IC1 in the permit which requires the operator to submit a Dust Management Plan (DMP) to the Environment Agency for approval. The DMP shall take into consideration the risk of dust pollution associated with the permitted site operations especially as it relates to the external waste storage and handling operations.</p>

Raw Material, Process efficiency and Water Use appropriate measures	CC	<p>The operator confirmed that minimal amounts of raw materials are used to maintain plant and equipment used to handle and process waste. Raw materials include diesel for the shredder and machinery used for the handling and treatment of the waste. There is an inventory of all the materials used which also includes supporting documents such as material safety data sheets and COSHH assessments see BAT 11A - Machinery consumption 2021 alternative options tab and BAT 11B - AES COSHH 04 diesel. Also see BAT 19 - Annual Report Data 2021 where annual water and energy consumption is recorded and reviewed.</p> <p>Water consumption is tracked annually and reviewed against previous annual consumption data and reported to the EA as part of the annual reporting process.</p>
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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	<p>The operator is accredited to ISO14001. A copy of the ISO14001 certificate was provided. ANSA is accredited to ISO 14001:2015 and externally certified by Alcumlus who are UKAS accredited. Certification has been held since 2018. The scope of certification covers the permitted area on site. Refer to document reference BAT 01 ISO 14001 certification.</p> <p>Senior management are committed to ensuring the EMS is implemented and environmental matters undergo continuous improvement. The site’s EMS is linked to the management plans and procedures that are reviewed on regular basis.</p>
BAT 2 - Waste pre-acceptance, acceptance and tracking appropriate measures	CC	<p>The operator submitted documents titled ‘BAT 02A pre-acceptance process flow’, ‘BAT 02F-Mixed recycling information sheet for trade waste customers’, ‘BAT 02B - 4.2.1 Waste Acceptance Procedure’ and ‘BAT 02C - Waste acceptance and rejection procedure process flow dec 21’, ‘BAT 02 - Fly tipped procedure dec 21’ ‘BAT 02E-Terms and Conditions for Trade Waste customers (point 3)’ and ‘BAT 02H - Household Campaigns Flyer’, ‘BAT 02B- waste acceptance procedure’, ‘BAT 04A -waste storage procedure’, and BAT 02D- weighbridge procedure to demonstrate that they have appropriate waste pre-acceptance, acceptance and tracking procedures.</p> <p>In order to reduce the likelihood of incompatible items within the kerbside collected wastes from households, the operator run a variety of targeted campaigns within the borough to reconfirm items that can and cannot be accepted in the waste streams.</p> <p>The operator indicated that they do not undertake chemical analysis of the incoming waste because it is kerbside collected municipal waste. Any wastes identified at the weighbridge or during the tipping processes that are not acceptable are isolated and quarantined for appropriate disposal.</p>

		<p>The site utilises a weighbridge system to capture the tonnages of all incoming and outgoing wastes by EWC code. This information is used to calculate the site throughput to ensure the site remains within the permitted tonnage. Waste accepted consist of kerbside collected municipal waste and waste from local businesses comprised of similar materials. Once waste is received at the site, the operation does not support a full tracking system as the waste is tipped loose and not held within identifiable or numbered containers. A weighbridge procedure is available detailing the correct method to follow to input entries into the system.</p> <p>All waste documentation is available for 6 years and retained electronically, the weighbridge system provides data for all incoming and outgoing waste movements and using this information, the tonnages on-site can be calculated. Pre-acceptance testing for dusts, heavy metals and PCBs is not a requirement for accepting/disposing of waste from the site.</p>
BAT 3 - Inventory of wastewater and waste gas streams	FC	<p>There are channelled emission points to air and sewer from the site. The operator indicated no treatment is undertaken at the site which has the capacity to produce waste gases or wastewater streams and as such have not provided inventory of wastewater.</p> <p>Based on our knowledge of the site, we have considered that there are channelled emission points to air (via the odour/dust abatement units) and to sewer. As such, 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 IC3 – IC5 which require the operator to monitor and carry out a H1 assessment for emissions to sewer. The emissions to sewer are 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.</p>
BAT 4 - Storage procedures	CC	<p>The operator confirmed that they have storage procedures (BAT 04A - Waste Storage Procedure) detailing the locations for the delivery of the incoming wastes to ensure these are segregated for the correct waste treatment process.</p> <p>Storage for residual waste and recyclable materials is undertaken within fully enclosed Waste Transfer Stations with odour equipment. The bays within the waste facilities are used on a rotational basis where appropriate, to ensure effective and efficient processing of waste.</p> <p>Waste storage areas consist of a hardstanding, with a sealed drainage system, is sited away from sensitive receptors. Non-recyclable and recyclable wastes are stored within separate enclosed buildings which utilise fast action roller shutter doors.</p> <p>Waste throughput is recorded through the on-site weighbridge system. Maximum residence times are noted in the daily checklist. Wastes are removed as per collection schedules to ensure waste residence time is as short as is reasonably practicable. Monthly meetings are held between senior management and on-site Technically Competent Managers (TCM's) to discuss remaining capacity within the permitted throughput.</p> <p>The only potential source of heat sensitive materials on site are orphaned gas cylinders. The</p>

		enclosure for these items has been constructed as per WISH 03 guidance. Any non-compliant items are held in the quarantine area for onward disposal. The operation handles small amounts of chemicals identified from contamination checks of the incoming wastes. These items are isolated and quarantined for compliant disposal.
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 documents titled BAT 05B - 4.2.5 Waste Treatment Procedure - WTS-RDF and BAT 05C - 4.2.4 Waste Treatment Procedure - WTS-Recycling.
BAT 6 - monitor key process parameters	FC	The operator indicated that this BAT is not applicable because no emissions to water or wastewater streams are generated by the installation operations. Based on our knowledge of the site, we have considered that surface runoff and wastewater are generated and discharged to sewer from the waste handling area. As such in line with the WT BATC, we have included monitoring requirements (parameters and limits) in Table S3.3 of the permit, together with Improvement Conditions IC3 – IC5 which require the operator to monitor and carry out a H1 assessment for emission to sewer. The emissions to sewer are 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 6 - monitor key process parameters	FC	The operator indicated that this BAT is not applicable because no emissions to water or wastewater streams generated by the operation. Based on our knowledge of the site, we have considered that surface runoff and wastewater are generated and discharged to sewer from the waste handling area. As such in line with the WT BATC, we have included monitoring requirements (parameters and limits) in Table S3.3 of the permit, together with Improvement Conditions IC3 – IC5 which require the operator to monitor and carry out a H1 assessment for emission to sewer. The emissions to sewer are 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 8 - monitor channelled emissions to air	FC	The operator indicated that this BAT is not applicable because ' <i>no requirements to monitor emissions to air as it is not a permit requirement to monitor emissions to air in accordance with EN standards. Both enclosed facilities have dust extraction equipment filtering out dust see document BAT 31 - Camfil Operational Information. The site also holds an Odour Management Plan see document BAT 10 - 4.3.4 CEC EP - Odour Management Plan word version 2022 and Dust Management procedure see document 14A - Dust Management Procedure</i> '.

		Based on our knowledge of the site, we have considered that 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 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	CC	<p>The operator indicated that '<i>Odour monitoring is conducted as per the site odour management plan see BAT 10 - 4.3.4 CEC EP - Odour Management Plan 2022. No requirement within the plan to conduct external monitoring for odour, other than sniff testing to EA guidance H4, at dedicated receptor locations. Sniff testing is conducted twice daily at the stated receptor points in the OMP. There are no requirements within the permit to monitor odour emissions to a British Standard. Daily olfactory monitoring is carried out as per the permit and as previously described. Where odour complaints are received, additional olfactory monitoring is completed as appropriate. Odour abatement equipment is utilised for both enclosed facilities.</i></p> <p>The operator has an approved Odour Management Plan (OMP) in place at the site. We do not have reason to believe that there are odour issues at the site to warrant the revision of the existing OMP at this point.</p>
BAT 11 - monitor consumption of water, energy and raw materials, and generation of residues and wastewater	CC	<p>A permit condition is in place which requires the operator to submit end of year reports for water, energy and raw materials usage.</p> <p>The operator stated that '<i>Data is collated for energy and water and reviewed as part of the annual report submitted to the EA see BAT 11 - Annual Reporting Forms 2021. Figures are reviewed annually to ascertain whether there are any fluctuations in consumption that can be attributed to the operation see BAT 19 - Annual Report Data 2021. No raw materials are used in the waste treatment process; therefore the waste handling machinery consumption has been provided see BAT 11A - Machinery consumption 2021 updated. Alternative raw materials/machinery have been considered for the operation and investigations into alternative options undertaken where applicable see BAT 11A - Machinery consumption 2021 updated alternative options tab. COSHH assessments have been completed for relevant products used on site which provide details regarding the safety and environmental hazards and controls required for the substances used see BAT 11B - AES COSHH 04 diesel. Annual water and energy consumption is recorded and reviewed see BAT 19 - Annual Report Data 2021.</i></p>
BAT 12 - odour management plan	CC	The operator has an approved Odour Management Plan (OMP) in place at the site. We do not have reason to believe that there are odour issues at the site to warrant the revision of the existing OMP at this point.

BAT 13 - reduce odour emissions	CC	The operator has an approved Odour Management Plan (OMP) in place at the site. We do not have reason to believe that there are odour issues at the site to warrant the revision of the existing OMP at this point.
BAT 14 - reduce diffuse emissions to air	CC	<p>The majority of wastes are stored within fully enclosed buildings with fast action doors. Waste turnaround for odorous materials is within 3 days. Any waste stored outside is stored within designated areas as per the permit conditions. Odour abatement equipment is utilised for both enclosed facilities. The dust equipment removes dust from the air by passing it through a pre-filter and then through a series of large hemipleat filters made of a blend of cellulose and polyester fibres. These filters are then periodically cleaned with automatic blasts of compressed air which forces the dust to drop under gravity.</p> <p>The activities taking place outside are undertaken in line with the <u>Non-hazardous and inert waste: appropriate measures for permitted facilities</u>, however we have included Improvement Condition IC1 in the permit which requires the operator to submit a Dust Management Plan (DMP) to the Environment Agency for approval. The DMP shall take into consideration the risk of dust pollution associated with the permitted site operations especially as it relates to the external waste storage and handling operations.</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	<p>The operator stated that '<i>Minimal number of noise complaints received on site. Annual site noise survey conducted to confirm the site is operating within the requirements of the sites planning permission see document ref BAT 18-Site Noise Survey. Activities likely to generate higher levels of noise are conducted within enclosed buildings with fast action roller shutter doors. Regular maintenance of plant and equipment is undertaken as per manufacturers guidance.</i></p> <p><i>Equipment is used by suitably experienced staff. Noise attenuation is fitted to the odour abatement stacks to reduce noise impact from the operation. Sound proofing available on roof panels. Pre-operational checks are conducted on waste handling equipment to ensure the machinery.</i></p> <p>We do not have reason to believe that there are noise issues at the site. As such, we have not asked the operator to provide noise and vibration management plan as an improvement condition.</p>
BAT18 - reduce noise and vibration emissions	CC	<p>The operator stated that '<i>Minimal number of noise complaints received on site. Annual site noise survey conducted to confirm the site is operating within the requirements of the sites planning permission see document ref BAT 18-Site Noise Survey. Activities likely to generate higher levels of noise are conducted within enclosed buildings with fast action roller shutter doors. Regular maintenance of plant and equipment is undertaken as per manufacturers guidance.</i></p>

		<p><i>Equipment is used by suitably experienced staff. Noise attenuation is fitted to the odour abatement stacks to reduce noise impact from the operation. Sound proofing available on roof panels. Pre-operational checks are conducted on waste handling equipment to ensure the machinery'.</i></p> <p>We do not have reason to believe that there are noise issues at the site. As such, we have not asked the operator to provide noise and vibration management plan as an improvement condition.</p>
BAT 19 - optimise water consumption, reduce wastewater and prevent or reduce emissions to soil and water	FC	<p>The operator stated the following:</p> <ul style="list-style-type: none"> • Water is not used in the waste process on site other than jet-washing the rear of sweeper wagons to ensure full debris removal (via a discharge consent with united utilities). • The site surfacing is impermeable. • Water consumption is tracked annually. <p>The recyclable and RDF wastes are treated in an enclosed building.</p> <ul style="list-style-type: none"> • Externally stored WEEE waste is stored in covered containers to prevent contaminated runoff. • Surface water drainage drains from the external bays into the attenuation tank via interceptors with the output discharged to surface water. Potential run off from dewatering sweeping waste drains into a system consisting of silt traps which are maintained and emptied on a regular basis - the output of this drains to foul sewage. • Drains and associated systems are maintained and serviced on a regular basis. • All 3 surface outlets can be closed via penn-stock valves on the identification of an incident requiring these to be shut. <p>Based on our knowledge of the site, we have considered that surface runoff and wastewater are generated and discharged to sewer from the waste handling area. As such in line with the WT BATC, we have included monitoring requirements (parameters and limits) in Table S3.3 of the permit, together with Improvement Conditions IC3 – IC5 which require the operator to monitor and carry out a H1 assessment for emission to sewer. The emissions to sewer are 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.</p>
BAT 20 - waste water treatment	FC	<p>Although the operator indicated the activities at the site do not generate wastewater that requires treatment, we have considered that surface runoff and wastewater are generated and discharged to sewer from the waste handling area. As such and in line with the WT BATC, we have included monitoring requirements (parameters and limits) in Table S3.3 of the permit, together with Improvement Conditions IC3 – IC5 which require the operator to monitor and carry out a H1 assessment for emission to sewer. The outcome of the improvement programme will determine whether wastewater treatment will be required or not.</p>

<p>BAT 21 - prevent or limit the environmental consequences of accidents and incidents</p>	<p>CC</p>	<p>The operator has an Accident Management Plan (re: BAT 21A) which covers accidents and incidents that could generate pollution. The site also has an emergency plan handbook for each tier of management detailing the correct actions and responsibilities to be taken in the event of an incident - see BAT 21C - Emergency Plan handbook SM2 Jan22.</p> <p>The operator indicated that the site has dust suppression equipment containing measures to discharge an explosion via dedicated vents. There are also emergency provisions such as spill kits and fire suppression measures e.g., fire extinguishers. Penn stock valves are available for restricting drainage from the site. Sandbags are available to aid the containment of fire water from the site.</p> <p>The operator has a business continuity plan concerning incidents that may significantly impact the operation of the business and the actions to be taken to ensure the operation continues - BAT 011 - 3.4 ANSA WTS Contingency Plan. The aspects and impacts register for the EMS highlights the main environmental issues associated with the operation of the site which assess abnormal conditions and emergency situations see document BAT 21B Aspects register.</p> <p>Because the operator is storing combustible waste at the site, we have included Improvement Condition IC2 in the permit which requires the operator to submit a revised Fire Prevention Plan to the Environment Agency for approval. The plan shall identify all potential sources of fire risk within the permitted area and include measures to prevent fires and minimise the risk of pollution from fires in accordance with the Fire Prevention Plan guidance and template.</p>
<p>BAT 22 - substitute materials with waste</p>	<p>NA</p>	<p>The operator indicated that raw materials are not used in the process.</p> <p>Given the nature of the waste treatment operations, we agreed that this BAT is not applicable.</p>
<p>BAT 23 - Energy efficiency plan, energy balance record</p>	<p>CC</p>	<p>The operator provided an Energy Efficiency Plan as part of their response to the additional information request. Energy consumption is currently recorded as annual consumption for the annual report requirements specified in the permit. We agree that this is sufficient to meet the requirements of this BAT conclusion.</p>
<p>BAT 24 - maximise reuse of packaging</p>	<p>NA</p>	<p>No packaging is generated during the installation activities. The processes on site do not involve the use of packaging. Given the nature of the waste treatment operations, we agreed that this BAT is not applicable.</p>
<p>BAT 25 - General - Emissions to air (Techniques to reduce plus AEL for dust).</p>	<p>CC</p>	<p>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.</p> <p>A shredder is operated on site to process non-recyclable municipal waste into RDF.</p> <p>Both enclosed facilities have dust extraction equipment filtering out dust. Dust extracted by the system is captured within drums. The dust equipment removes dust from the air by passing it through a pre-filter and then through a series of large hemipleat filters made of a blend of cellulose</p>

		and polyester fibres. These filters are then periodically cleaned with automatic blasts of compressed air which forces the dust to drop under gravity.
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 a non-conforming waste procedure in place at the site.
BAT 31 - Emissions to air (Techniques to reduce emissions to air including AEL)	CC	The site benefits from odour abatement equipment which utilises adsorption to remove odour by adhering potentially odorous particles to the activated carbon media contained within the equipment - see BAT 31 Camfil Operational Information and BAT 10 - 4.3.4 CEC EP - Odour Management Plan 2022. The abatement system maintains the building under an adequate negative pressure to ensure air is retained within the buildings and enters the treatment system via the ducting throughout the building. The odour abatement equipment also filters out airborne dust into sealed drums which are emptied on a regular basis. The equipment is maintained and serviced as per manufacturer specifications see BAT 31A - Camfil Service Report RDF and BAT 31B - Camfil Service Report WTS.
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, S2.3 and S2.4 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. If you consider them appropriate for treatment at your facility, provide us with a justification.</p>	<p>The operator advised that the EWC codes highlighted in yellow in Appendix 1 of the RFI and 18 01 04 should be removed from the permit because they do not accept or treat the waste types. However, they requested that they would like to keep the remaining EWC codes.</p> <p>In addition, the operator requested in an email dated 20/09/2023 (and updated on the 31/10/2023) that they would want us to add the following EWC codes to the permit: 08 01 11*, 13 01 13*, 13 02 04*, 13 02 05*, 15 01 10*, 16 05 04*, 16 05 05, 16 06 01*, 16 06 02*, 16 06 03*, 16 06 04, 16 01 03, 16 02 11*, 16 02 13*, 20 01 21*, 20 01 23*, 20 01 35*, 20 01 40, 20 02 01.</p> <p>The operator indicated that they would like the codes to be added to reflect their current site operations. Although these codes are currently non-permitted waste streams, we have considered that it is important to regularise the site operations by including them and by expanding the description of activity AR7 to include storage and transfer of green waste and street cleaning/fly-tipped wastes (e.g., batteries, gas cylinders, paints and chemicals).</p>
<p>Clarify the type and nature of the activities that you are undertaking under activity A4, Table S1.1 of your permit and the activity listed under Table S1.1a of your permit. Provide details on how these two activities are connected or linked to Tables S2.3 and S2.4 of your permit.</p>	<p>In addition to providing clarification on the nature of the activities that they are undertaking with the RDF and Waste Transfer Station buildings, the operator advised that they would like to move Table S1.1a activities, as outlined in Figure 1 to A4 and delete the Table S1.1a activity.</p> <p>They also advised that the wastes identified in S2.3 and S2.4 are processed through the WTS and that they should be consolidated.</p> <p>Wastes listed in Table S2.3 and S2.4 (less those that the operator agreed to remove) are now consolidated in Table S2.3 of the permit.</p> <p>As an additional request, the operator indicated that <i>'the site have a contract with Cheshire East Council (CEC) which is referenced in the permit. Ansa Environmental would like this reference removed from the permit, as they also accept trade waste and may accept waste from outside of the borough.</i> The permit has been amended by removing reference to Cheshire East Council (CEC) in the Introductory page of the permit.</p>
<p>Provide information on the quantity of hazardous waste that you are treating or storing at any one time.</p>	<p>The operator provided information on the storage throughput of hazardous waste which shows that the throughput is less than 50 tonnes at any one time.</p>
<p>Provide information on the daily throughput of ash and slags that you are treating at the site.</p>	<p>The operator confirmed that they do not accept or treat ash and slags at the site. By this, they accepted that waste codes related to ash and slags should be removed from the permit.</p>
<p>Provide details of the activities or operations that you are seeking to add to the permit.</p>	<p>The operator confirmed that they are receiving, storing and dewatering street sweeping waste under Regulatory Position Statement (RPS) 65.</p> <p>They also confirmed that <i>'the site also operates external bays for the acceptance of bagged street cleansing waste (from litter bin emptying throughout the borough), bulky waste from household collections and fly-tipped collections, WEEE, Metals, Batteries, fluorescent tubes, orphaned gas cylinders, tyres and green waste from</i></p>

	<p><i>parks and grounds maintenance activities through the borough. These activities take place within the permitted boundary and can be found in Appendix II 'Cledford Lane EA permit plan Jun 23'.</i></p> <p>The above activities are now incorporated in the permit under AR7 activity.</p>
Provide an updated site layout plan and show on it, the locations of channelled emission points, including those associated with the dust and odour abatement units.	<p>The following drawing were included in the response received from the operator:</p> <ul style="list-style-type: none"> ▪ 'Cledford Lane EA permit plan Jun 23' which identifies the emissions to air discharge points from the odour and dust abatement. ▪ 'Drainage plan showing UU agreed dip point Nov 22' which shows the location (grid reference SJ 71353 64838) where the emission leaves the installation and where United Utilities (UU) take their sample from.
Provide details of your wastewater inventory and monitoring plans as required under BATs 3, 6 and 7 of the Waste Treatment BAT Conclusions (WT BATC).	<p>The operator stated that they do not carry out any proactive monitoring of the wastewaters themselves and that this is something that they are currently looking to do moving forward over the next couple of months.</p> <p>In line with the WT BATC, we have included monitoring requirements (parameters and limits) in Table S3.3 of the permit, together with Improvement Conditions IC3 – IC5 which require the operator to monitor and carry out a H1 assessment for emission to sewer. The outcome of the improvement programme will determine whether wastewater treatment will be required or not.</p>
Provide additional information to show that your waste storage procedure is in line with BAT 4 of the WT BATC, especially it relates to the storage of dewatering sweeping waste.	<p>The operator stated that <i>'storage of wastes is in-line with BAT techniques 'adequate storage capacity' and 'safe storage capacity'. Wastes are stored in line with permit requirements and are not exceeded in line with the sites waste procedure (Appendix XVIII '4.2.3 Waste Storage Procedure').</i></p> <p><i>The road sweepings are currently not protected from the elements (i.e. rainwater). They are stored in a hardstanding area in their own designated bay. Please refer to Figure 3 and to the response provided for question 10 of this document'.</i></p> <p>We are satisfied that the information provided is sufficient.</p>
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 stated that:</p> <ul style="list-style-type: none"> ▪ Uncontaminated site surface water drainage discharges to canal overflow to Sanderson Brook. There is an attenuation tank (number 10 in Appendix XXI 'Drainage plan for quote purposes') and is used in emergency situations. There is an interceptor on the main car park after the attenuation tank (number 6 in Appendix XXI 'Drainage plan for quote purposes'). Details of the interceptor specification drawing can be found in Appendix XXII 'SPEL detailed drawing 31-10-16 Interceptor 1'. ▪ There is a petrol interceptor in Zone 5 (refer to Appendix II 'Cledford Lane EA permit plan Jun 23') and is number 7 in Appendix XXI 'Drainage plan for quote purposes'. Details of the petrol interceptor can be found here in Appendix XIII 'A091680 - DR 506_INTERCEPTOR No2 Rev A - As Built'. ▪ There are also 3 penstock valves on the surface water drainage systems which can be shut in an emergency situation to prevent any contaminated water leaving site (refer to Appendix XXIV 'Cledford Lane Penstock locations'.

	<ul style="list-style-type: none"> ▪ The trade effluent from the dewatering of the road sweepings and from areas that are used for external storage of waste is treated via silt traps (refer to numbers 1, 2 and 9 in Appendix XXI 'Drainage plan for quote purposes' and discharged to foul drain. Please also refer to the following document references: Appendix VI 'Silt Trap Flow Chart', Appendix VII 'Silt Trap Specification', Appendix III 'Drainage plan showing UU agreed dip point Nov 22', <p>The operator also confirmed that they have a drainage and maintenance agreement in place with Howes. Refer to Appendix XX Howes Drainage Agreement December 2022 and Appendix XXI 'Drainage plan for quote purposes' and highlights the areas where the maintenance work is carried out.</p> <p>We have added a restriction in the permit that <i>'there shall be no mixing of clean and contaminated waters'</i>.</p>
<p>Clearly identify the measures that you have in place to ensure that wastewater generated within the external area of the site is treated before discharge.</p>	<p>Although the operator indicated that <i>'the effluent is treated via a silt trap before it is discharged to foul drain'</i>, we have included monitoring requirements (parameters and limits) in Table S3.3 of the permit, together with Improvement Conditions IC3 – IC5 which require the operator to monitor and carry out a H1 assessment for emission to sewer. The outcome of the improvement programme will determine whether wastewater treatment will be required or not.</p>
<p>Provide justification on why you think that dust limit specified in BAT 25 is not relevant to your site given that you have channelled emission point that are linked to your shredder?</p>	<p>The operator stated that <i>'Ansa Environmental do meet BAT 25. Dust abatement is installed, and the technology applied is the same in both of the sheds. In compliance with BAT, bag filters are used to remove particulates from the air stream. The dust is removed from the air by passing through a pre-filter and then through a series of large hemipleat filters made of a blend of cellulose and polyester fibres. These filters are then periodically cleaned with automatic blasts of compressed air, which forces the dust to drop under gravity. The filtered dust is contained in drums below the equipment which, once full, are removed for onward disposal. The filters are replaced in line with the manufacturer's guidance. The dust and odour abatement equipment also filters out odour particles from the air within the facilities by using adsorption'</i>.</p> <p>Based on our knowledge of the site, we have considered that they are channelled emission points to air at the site (via the odour/dust abatement units). As such, in line with the WT BATC, we have included monitoring requirements (parameters and limits) in Table S3.1 for emission to air.</p>