

Permitting Decisions- Environment Agency Initiated Variation

We have decided to issue an Environment Agency initiated variation for R. Plevin & Sons operated by R. Plevin & Sons 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/LB3532AU/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

The 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.

Read the permitting decisions in conjunction with the environmental permit and the variation notice.

Key issues of the decision

Environment Agency led variation – permit review

We have carried out an Environment Agency initiated variation to the permit following a permit review as required by legislation to ensure that permit conditions deliver compliance with relevant legislative requirements and appropriate standards to protect the environment and human health.

The Industrial Emissions Directive (IED) came into force on 7 January 2014 with the requirement to implement all relevant Best Available Techniques (BAT) Conclusions as described in the Commission Implementing Decision. Article 21(3) of the IED requires us to review conditions in permits issued and to ensure that the permit delivers compliance with relevant standards. This must be within four years of the publication of updated decisions on Best Available Techniques (BAT) Conclusions.

The BAT Conclusions for Waste Treatment (the BREF) was published on 17 August 2018 following a European Union wide review of BAT, implementing decision (EU) 2018/1147 of 10 August 2018. Relevant existing facilities must be in compliance with the BAT Conclusions within 4 years.

Our technical guidance [Non-hazardous and inert waste: appropriate measures for permitted facilities](#) explains the standards that are relevant for regulated facilities with an environmental permit to treat or transfer non-hazardous wastes.

We issued a notice under regulation 61(1) of the Environmental Permitting (England and Wales) Regulations 2016 (a Regulation 61 Notice) on 08/11/2021 requiring the operator to provide information to confirm that the operation of their facility currently meets, or how it will subsequently meet, the standards in the Waste Treatment BAT Conclusions.

The notice required the operator to:

1. Provide a brief non-technical description of the regulated facility, including
 - all listed activities, waste operations and registered waste exemptions (if any).
 - a list of wastes handled at the site, the key stages in the “process” and the relevant disposal and recovery operations.
 - the scale of the operation i.e., the waste storage and daily treatment capacity of the process.
 - a brief description of the principal releases to air, land and water including noise, dust and odour, along with a description of any abatement techniques and site plan.
 - description of the site location and any key sensitive receptors.
2. Identify the BAT Conclusions that are applicable to the facility’s operations. Confirm whether or not the operations comply with the requirements.
3. Where operations are not currently complying, the operator was required to provide:
 - details of how the relevant standards and requirements will be met.
 - details of how they will fully comply with the requirement by 17 August 2022.
 - justification as to why an alternative technique is appropriate and will achieve an equivalent level of environmental protection to the standards in the BAT Conclusion.
 - details of any activities they intend to cease operating by the compliance date (August 2022).
4. Confirm whether they operate a medium combustion plant or specified generator (as per Schedule 25A or 25B of EPR 2016).

The [Non-hazardous and inert waste: appropriate measures for permitted facilities](#) guidance was published on 12 July 2021 on gov.uk. This technical guidance explains the standards that are relevant to regulated facilities with an environmental permit to store, treat or transfer non-hazardous waste, providing relevant standards (appropriate measures) for those sites. The operators were notified about the new guidance and were advised to consider them in their submissions.

The standards described in our technical guidance are split into chapters:

- General management appropriate measures
- Waste pre-acceptance, acceptance and tracking appropriate measures
- Waste storage, segregation and handling appropriate measures
- Waste treatment appropriate measures
- Emissions control appropriate measures
- Emissions monitoring and limits appropriate measures
- Process efficiency appropriate measures

Our assessment of the responses received from the operator are summarised in Table 1.

The Regulation 61 Notice required the operator to confirm whether they could comply with the standards described in each of these chapters. Table 1 below provides a summary of the response received and our assessment of it. The overall status of compliance with the standards (appropriate measures) is indicated in the table as:

NA – Not Applicable

CC – Currently Compliant

FC – Compliant in the future (through improvement conditions set in permit)

NC/IC – Not Compliant; Improvement/New Condition included

Extent of this review

We have reviewed the operations that relate to the Installation activities in this permit against the relevant requirements of Best Available Techniques (BAT) Conclusions set out in implementing decision (EU) 2018/1147 of 10 August 2018.

Regulation 61 Response

The Regulation 61 notice response from the Operator was received on 24/03/2022.

We considered that the response did not contain sufficient information for us to commence determination of the permit review and we needed further information to complete the permit review assessment.

We sent a request for further information (RFI) by email to the operator on the 24/10/2023. The operator replied on 22/11/2023, providing further documentation.

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
 - *'Regulation 61 Notice and annex 1 spreadsheet titled "NHI Installations Reg 61 notice - Annex 1 tranche 2"*
- Documents received in response to RFI
 - *'Non Technical Description – Plevin Hazlehead (V2)'*
 - *'RFI Response'*

Further documents provided included but not included within table S1.2:

- *'Appendix 1 – SHEQ07 Management Review'*
- *'Appendix 2 – wastewater inventory'*
- *'Appendix 3 – dust monitoring results and gauge locations'*

Changes to the permit conditions

Following the assessment of the information provided by the operator in response to the Regulation 61 Notice, summarised in table 1, we have made the following changes to the permit conditions:

- Condition 2.1.2 - Condition added in-line with modern template.
- Condition 2.3.1 - Updated and renumbered in-line with modern template.
- Condition 2.3.3 - Condition added to detail raw materials in table S2.1.
- Condition 2.3.6 - Condition added in-line with modern template.
- Condition 3.2.1 - Wording updated in-line with modern template.
- Condition 3.4.2 - Condition updated in-line with modern template.
- Condition 3.5.1 - Amended with addition of new reference for Table S3.2, ambient air monitoring requirements.
- Condition 3.5.3 - Condition added in-line with modern template. subsequent condition has been renumbered.
- Condition 3.6 - Pest conditions removed as not relevant for the permitted operations.
- Condition 3.7.1 - Fire Prevention condition added in-line with modern template and standard.
- Conditions 4.2.2 – 4.2.5 - Conditions re-numbered and updated to modern format.
- Condition 4.3.1 - Updated wording to match modern template.
- Condition 4.3.3 - New condition added in-line with modern template.
- Conditions 4.3.4 – 4.3.6 - Re-numbered following the addition of 4.3.3.
- Condition 4.4.2 - Wording updated in-line with modern template.
- Table S1.1 as referenced in condition 2.1.1 - Activities table updated in-line with modern standards and current site activities.
- Table S1.2 as referenced in condition 2.3.1 - Operating techniques added and updated following regulation 61 review.
- Table S1.3 as referenced in condition 2.4.1 - Addition of Improvement conditions IP1 - IP8
- Table S2.1 as referenced in condition 2.3.3 - Raw materials table added in-line with modern template.
- Table S3.1 as referenced in condition 3.5.1 - Emissions to surface water updated in-line with BAT.
- Table S3.2 as referenced in condition 3.5.1 - Surface water monitoring table deleted. Monitoring covered in table S3.1. Addition of new table 3.2 for ambient air monitoring requirements.
- Table S4.1 as referenced in condition 4.2.3 - Amended to include reporting for ambient air monitoring.
- Table S4.2 as referenced in condition 4.2.2 - Annual production parameters updated to include wood processed.
- Table S4.3 as referenced in condition 4.2.2 - Performance parameters updated in-line with modern template.
- Table S4.4 as referenced in condition 4.2.3 - Additional reporting forms added and updated.

- Schedule 5 as referenced in conditions 4.3.2 and 4.3.4 - A new paragraph (c) to Part A requiring notification of breach of permit conditions not relating to limits has been added.
- Schedule 6 - Interpretations have been updated.

Key Issue

Impermeable surfacing

The key issue that was identified as part of the permit review was the requirement to cover the operational areas of site with impermeable surfacing and a sealed drainage system. Plevin and Sons operate on a large site which is largely covered with hardstanding, upon which waste is stored. This was previously allowed under the current condition of the permit however, with the introduction of the Waste Treatment Best Available Technique Conclusions and the Non-hazardous and inert waste: appropriate measures for permitted facilities this is no longer the case there is now a requirement to cover waste reception, handling, storage and treatment areas with impermeable surface.

BAT Conclusion 19 of the Waste Treatment BAT Conclusions states “*Depending on the risks posed by the waste in terms of soil and/or water contamination, the surface of the whole waste treatment area (e.g. waste reception, handling, storage, treatment and dispatch areas) is made impermeable to the liquids concerned.*” This BAT conclusion is generally applicable to all waste installations. The Environment Agency considers that waste woods such as those that are stored at Plevin and Sons have the potential to cause contamination of soil and water if protective measures such as impermeable surface are not in place. Waste woods are contaminated because they are treated with substances which contain contaminants such as heavy metals. Over time, these substances can leach into the environment in cases where relevant protection is not provided to prevent this.

Section 6.5 of the Non-hazardous and inert waste: appropriate measures for permitted facilities states “*You must store and treat all waste on an impermeable surface with contained drainage that meets CIRIA 736 or an equivalent approved standard. The impermeable surfaces must have sealed construction joints.*” This standard is being applied across waste installations. Although the appropriate measures guidance goes on to state “*These requirements do not apply in designated areas where the waste being stored or handled does not pose any significant risk of contaminating surface water or ground water. You must appropriately isolate these designated areas from other operational areas so that there cannot be any flows between them. This includes in the event of an accident, for example a fire.*” We consider that this does not affect the decision on the need for impermeable surfacing given the already established position that waste woods have the potential to contaminate soil, surface water and groundwater. Only wastes that do not have the potential to contaminate soil, surface water and groundwater (such as inert waste) can be allowed for handling, storage and treatment on hardstanding under the provisions of Section 6.5 of the Non-hazardous and inert waste: appropriate measures for permitted facilities.

Besides the provisions of the Waste Treatment BAT Conclusions and the Non-hazardous and inert waste: appropriate measures for permitted facilities, the waste wood quick guide also states *“All waste wood storage and handling areas should be on an impermeable surface and sealed drainage and located away from watercourses and sensitive receptors.”*

Again, it is required in the Fire Prevention Plan guidance that an operators plan should make provision for how they control and contain fire water that will be generated during a fire fighting and fire incident at their site. The Fire Prevention Plan Guidance states *“You should not allow any fire water to enter the ground or surface water.”* This currently cannot be achieved across the site as waste is stored on hardstanding which would not be impermeable contain fire water and to control its impact on the soil, surface water and/or ground water.

In order to address the required site improvements from hardstanding to an impermeable surface, the Environment Agency have included two improvement conditions within the permit. IP6 requires the operator to submit a proposal for covering all areas where AR1, AR2 and AR3 take place with impermeable surfacing, sealed drainage and containment systems. There is a 6-month timescale for completion of this improvement condition. IP7 requires the operator to implement any improvements detailed within the proposals within an 18-month timeframe. The whole improvement programme spans a two-year completion timescale which the Environment Agency deem to be fair and reasonable.

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	FC	<p>The operator confirmed that they currently meet the requirements of the appropriate measures in this section with the exception of;</p> <ul style="list-style-type: none"> • A decommissioning plan • Management of change and sectoral benchmarking. <p>We have included an improvement condition IP1 which requires the operator to submit and maintain a decommissioning plan as specified in the Non-hazardous and inert waste: appropriate measures for permitted facilities guidance.</p> <p>The Request for further information response addressed the management of change and sectoral benchmarking with the inclusion of <i>Appendix 1 – SHEQ07 Management Review</i>.</p>
Waste pre-acceptance, acceptance and tracking appropriate measures	CC	<p>The operator confirmed that they currently meet the requirements of the appropriate measures in this section. Pre-acceptance and acceptance procedures were detailed within the Non-Technical Summary.</p>
Waste storage, segregation and handling appropriate measures	CC	<p>The operator confirmed that they currently meet the requirements of the appropriate measures in this section. Waste is stored in line with the site’s FPP.</p>
Waste treatment appropriate measures	CC	<p>The operator confirmed that they currently meet the requirements of the appropriate measures in this section.</p>
Emissions control appropriate measures	FC	<p>The operator confirmed that they currently meet the requirements of the appropriate measures in this section with the exception of;</p> <ul style="list-style-type: none"> • Enclosure within buildings – Though the majority of the site meets the requirements found in this section, an improvement condition IP5 has been included for the operator to look at further measures which could be implemented to prevent fugitive dust emissions from the main processing line, the outfeed bay and the storage area for processed waste wood. • Point source emissions to sewer - In line with the WT BATC, we have included monitoring requirements (parameters and limits) in Table S3.1 of the permit. As well as this, two improvement conditions have been included to ensure that the limits set are appropriate. IP4a and IP4b require the operator to monitor and carry out a H1 assessment by using the H1 screening tool. The final requirement is to propose and implement any additional measures required to treat the waste water where required following the assessment.

		<ul style="list-style-type: none"> Impermeable surfacing - as identified in the key issues section impermeable surfacing is not in place throughout the site. Improvement conditions IP6 and IP7 have been included which require the operator to submit proposals for installing this infrastructure and to implement the identified improvements agreed with the Environment Agency.
Emissions monitoring and limits appropriate measures	FC	<p>The operator confirmed that they currently meet the requirements of the appropriate measures in this section with the exception of;</p> <ul style="list-style-type: none"> Point source emissions to sewer - In line with the WT BATC, we have included monitoring requirements (parameters and limits) in Table S3.1 of the permit. As well as this, two improvement conditions have been included to ensure that the limits set are appropriate. IP4a and IP4b require the operator to monitor and submit an inventory of emissions as well as to carry out a H1 assessment by using the H1 screening tool. The final requirement is to propose and implement any additional measures required to treat the waste water where required following the assessment.
Process efficiency appropriate measures	FC	<p>The operator confirmed that they are not currently compliant with this section of the appropriate measures. A permit condition is in place which requires the operator to submit end of year report for water, energy and raw materials usage. The operations at the site also have limited scope for the use of raw materials, energy and water efficiency.</p> <p>An improvement condition, IP2 has been included in the permit which requires the operator to complete and submit an energy efficiency plan.</p>
Regulation 61 Requirement	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 indicated that they have ISO14001:2015 accreditation for their management system in their Regulation 61 response.</p> <p>However, they did identify areas that are lacking in their EMS, management of change and sectoral benchmarking. These areas were included in <i>Appendix 1 – SHEQ07 Management Review</i>, a document submitted in response to the RFI to demonstrate compliance.</p>
BAT 2 - Waste pre-acceptance, acceptance and tracking appropriate measures	CC	<p>The operator confirmed that they have waste acceptance and pre-acceptance procedures. Pre-acceptance and acceptance procedures were detailed within the Non-Technical Summary.</p>
BAT 3 - Inventory of wastewater and waste gas streams	FC	<p>There are no channelled emissions to air from the site but there are channelled emissions of contaminated waters to surface water.</p>

		<p>The operator indicated that they were compliant with this BATC however, they did not include an inventory of emissions in their response to the Regulation 61 Notice. This was requested as part of the RFI. In response, the operator identified that they do not hold a full inventory of emissions in line with BAT and requested the inclusion of improvement conditions to enable this to be addressed.</p> <p>In line with the WT BATC, we have included monitoring requirements (parameters and limits) in Table S3.1 of the permit. As well as this, two improvement conditions, IP4a and IP4b have been included in the permit which require the operator to monitor and submit an inventory of emissions as well as to carry out a H1 assessment by using the H1 screening tool. The final requirement is to propose and implement any additional measures required to treat the waste water where required following the assessment.</p>
BAT 4 - Storage procedures	CC	The operator confirmed that they have storage procedures in place at the site and confirmed they are compliant with this BAT requirement.
BAT 5 – Waste handling and transfer procedures	CC	The operator confirmed that they have waste handling and transfer procedures in place.
BAT 6 - monitor key process parameters	FC	<p>There are no channelled emissions to air from the site but there are channelled emissions of contaminated waters to surface water.</p> <p>The operator indicated that they were compliant with this BATc however, they did not include an inventory of emissions in their response to the Regulation 61 Notice. This was requested as part of the RFI. In response, the operator identified that they do not hold a full inventory of emissions in line with BAT and requested the inclusion of improvement conditions to enable this to be addressed.</p> <p>In line with the WT BATC, we have included monitoring requirements (parameters and limits) in Table S3.1 of the permit. As well as this, two improvement conditions, IP4a and IP4b have been included in the permit which require the operator to monitor and submit an inventory of emissions as well as to carry out a H1 assessment by using the H1 screening tool. The final requirement is to propose and implement any additional measures required to treat the waste water where required following the assessment.</p>
BAT 7 - monitor emissions to water	FC	<p>There are no channelled emissions to air from the site but there are channelled emissions of contaminated waters to surface water.</p> <p>The operator indicated that they were compliant with this BATc however, they did not include an inventory of emissions in their response to the Regulation 61 Notice. This was requested as part of the RFI. In response, the operator identified that they do not hold a full inventory of emissions in line with BAT and requested the inclusion of improvement conditions to enable this to be addressed.</p>

		In line with the WT BATC, we have included monitoring requirements (parameters and limits) in Table S3.1 of the permit. As well as this, two improvement conditions, IP4a and IP4b have been included in the permit which require the operator to monitor and submit an inventory of emissions as well as to carry out a H1 assessment by using the H1 screening tool. The final requirement is to propose and implement any additional measures required to treat the waste water where required following the assessment.
BAT 8 - monitor channelled emissions to air	N/A	There is no channelled emission to air. The permit does not allow channelled emissions to air.
BAT 9 - monitor diffuse emissions of organic compounds to air	N/A	The installation activities do not involve regeneration of spent solvents, the decontamination of equipment containing POPs with solvents, and the physico-chemical treatment of solvents for the recovery of their calorific value. This BAT is therefore considered not applicable.
BAT 10 - monitor odour	N/A	Given the nature of the waste treatment operations, we agreed that this BAT is not applicable.
BAT 11 - monitor consumption of water, energy and raw materials, and generation of residues and wastewater	CC	The operator indicated that they were compliant with this section of the BAT Conclusions. Further evidence was request by RFI and the response detailed how waste ad energy consumption are monitored. Permit condition is in place which requires the operator to submit end of year report for water, energy and raw materials usage.
BAT 12 - odour management plan	N/A	Given the nature of the waste treatment operations, the Environment Agency agreed that this BAT is not applicable.
BAT 13 - reduce odour emissions	N/A	Given the nature of the waste treatment operations, the Environment Agency agreed that this BAT is not applicable.
BAT 14 - reduce diffuse emissions to air	FC	The operator responded to the Regulation 61 Notice, indicating that are compliant with the requirements of BAT 14. Within their response they detailed that a further review was to take place following audit. The details of which were requested as part of the RFI. The Non Technical summary provided in response detailed further dust control measures which have been implemented on site in line with BAT 14. The main processing take place within a building inclusive of dust extraction. The pre-crushing now incorporates dust extraction and dust suppression and is in a fixed position on site where previously it was mobile. The majority of the site would presently be deemed compliant however an improvement condition has been included for the operator to assess the fugitive dust emissions produced at the end of the main processing line, the outfeed bay and the storage area for processed

		waste wood. The operator will then need to propose further improvements to control these emissions. This is IP5.
BAT 15 - minimise use of flaring	N/A	Given the nature of the waste treatment operations, we agreed that this BAT is not applicable.
BAT 16 - reduce emissions to air from flares	N/A	Given the nature of the waste treatment operations, we agreed that this BAT is not applicable.
BAT 17 - noise and vibration management plan	CC	The operator indicated that they are compliant with this BATC. No noise issues have been identified by presently at the site. Nonetheless, the permit includes conditions which allow a noise impact assessment and noise management plan to be requested if issues become apparent at a later date.
BAT18 - reduce noise and vibration emissions	CC	The operator indicated that they are compliant with this BATC. No noise issues have been identified by presently at the site. Nonetheless, the permit includes conditions which allow a noise impact assessment and noise management plan to be requested if issues become apparent at a later date.
BAT 19 - optimise water consumption, reduce wastewater and prevent or reduce emissions to soil and water	FC	<p>The operator indicated that they are compliant with the requirements of this BATc. The operator did not provide details to demonstrate that they have system in place for proper segregation of clean and wastewater at the site as required in point f of this BAT. Further information was requested, and the operator has detailed how water use is optimised. The response also detailed that clean rainwater is segregated from other sources of water before entering the drainage and the lagoons. The operator has expressed that they would look into the feasibility of harvesting and storing rainwater. As such, IP3 has been included which requiring the operator to submit proposals for the implementation of techniques for capturing and re-using of uncontaminated waters.</p> <p>As highlighted within the key issues section the operator indicated they were compliant with BAT19 however, it was clear that they operate the site on large areas of hardstanding rather than impermeable surfacing. As detailed, the Environment Agency have included two improvement conditions within the permit. IP6 requires the operator to submit a proposal for covering all areas where AR1, AR2 and AR3 take place with impermeable surfacing, sealed drainage and containment systems. There is a 6-month timescale for completion of this improvement condition. IP7 requires the operator to implement any improvements detailed within the proposals within an 18-month timeframe. The whole improvement programme spans a two year completion timescale which the Environment Agency deem to be fair and reasonable.</p>
BAT 20 - waste water treatment	FC	The operator indicated that this BATc was not relevant as they do not produce waste water. This BATc is relevant for the operation because surface water from waste storage area is

		<p>discharged to Seldbrook Dyke via the storage lagoons. As no details of waste water treatment were provided, further information was requested. Within their response the operator identified that they do not hold a full inventory of emissions and as such cannot determine if waste water treatment is required.</p> <p>In line with the WT BATC, we have included monitoring requirements (parameters and limits) in Table S3.1 of the permit. As well as this, two improvement conditions, IP4a and IP4b have been included in the permit which require the operator to monitor and submit an inventory of emissions as well as to carry out a H1 assessment by using the H1 screening tool. The final requirement is to propose and implement any additional measures required to treat the waste water where required following the assessment.</p>
BAT 21 - prevent or limit the environmental consequences of accidents and incidents	CC	The operator has indicated that they are compliant with this BAT requirement.
BAT 22 - substitute materials with waste	N/A	There is limited use of raw materials within the waste wood shredding process. Given the nature of the waste treatment operations, we agreed that this BAT is not applicable.
BAT 23 - Energy efficiency plan, energy balance record	FC	The operator has detailed within their response that they are currently not compliant with this BATc. Within the RFI response, they have requested an improvement condition to enable the installation of infrastructure to monitor energy consumption and following this the development of a formal energy efficiency plan. IP2 has been included to this affect.
BAT 24 - maximise reuse of packaging	N/A	No packaging is generated during the waste processing 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).	N/A	There are no channelled emissions of dust from the process and this was confirmed in response to the RFI. As such this requirement is not relevant to the operations.
BAT 26 - Metal shredders (Reduce accidents & incidents)	N/A	The installation is for the mechanical processing waste wood for incineration. 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)	N/A	The installation is for the mechanical processing waste wood for incineration. 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)	N/A	The installation is for the mechanical processing waste wood for incineration. 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)	N/A	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)	N/A	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)	N/A	There is no channelled emission to air and the permit does not allow channelled emission to air.
BAT 32 - WEEE containing mercury (Emissions to air including AEL)	N/A	WEEE is not being treated at the site. There is no channelled emission to air and the permit does not allow channelled emission to air.
BATs 33 - 53	N/A	We considered that BATs 33 - 53 are not applicable to installations processing waste wood for incineration. We consider these treatment activities as mechanical treatment.
Reg. 61 Request for Further Information (RFI) Assessment of response received		
Provide a decommissioning plan in line with section 2.5 of the Non-hazardous and inert waste: appropriate measures for permitted facilities or a timescale within which one will be supplied.	The operator stated that no decommissioning plan was in place and requested an improvement condition to address this. IP1 has been included within the permit to address this point.	
Provide an updated EMS (Environmental Management System) summary which demonstrates the addition of aspects missing as highlighted in your Regulation 61 response and required under BAT conclusion 1.	The operator responded by providing the document titled ' <i>Appendix 1 SHEQ-07 Management Review</i> ' which addressed the sectoral benchmarking and management of change.	
Provide details of your waste water inventory (incorporating information about the characteristics of the waste water stream) and monitoring of the key parameters as required under BATs 3 and 6.	The operator detailed that the current discharges are monitored in line with the current permit. This monitoring samples for ammonia, pH and visible oils. The operator further detailed that they do not hold a full waste water inventory in line with the BAT requirement but will complete this through the implementation of an improvement condition. IP4a and IP4b have been included in the permit which require the operator to monitor and submit an inventory of emissions as well as to carry out a H1 assessment by using the H1 screening tool. The final requirement is to propose and implement any additional measures required to treat the waste water where required following the assessment.	

<p>Review your response to WT BATC 19 and 20 and provide detail on the nature and quantity of contaminated runoff/wastewater being discharged from site along with details on the systems in place for the separate handling of clean and contaminated waters.</p>	<p>The operator responded detailing that water is only used for the purpose of dust suppression. To optimise and reduce water consumption as much as possible, dust suppression equipment is focused to key areas of the process such as incoming waste reception areas, material processing infeed and outfeed points, stockpile management and loading of vehicles in preparation for outbound delivery. Clean water falling on the external yard area collects with run-off from the buildings and roads on site. The operator has stated they will explore the feasibility of harvesting and storing clean rainwater. IP3 has been included to this affect.</p> <p>The operator responded that they are not currently able to prove or disprove adherence to the BAT-associated emission levels and as such this would mean they are unable to determine if treatment is required. An improvement condition was requested within the response and IP4a and IP4b have been added to enable the collection of the appropriate data to draw conclusions.</p>
<p>Provide further detail on the dust extraction in place on the shredding system. Confirm if there are any emission points from the shredder and/or building in line with WT BATC conclusion 8.</p>	<p>The operator responded stating “There are no channelled emissions to air from the dust extraction system.” Further information was included within the revised non-technical summary.</p>
<p>Provide details of any monitoring results of dust generated by the external pre crushing of wood.</p>	<p>The operator provided dust monitoring results providing collected data from 2019 to present from the frisbee gauges stations to collect and monitor dust levels. Due to exceedances noted in the frisbee gauge monitoring, we have included ambient air monitoring on a monthly basis as a requirement of the permit.</p> <p>Details were also provided on the upgraded pre-crushing plant on site and how this enables greater control and containment of fugitive dust emissions. Details were given within the amended Non-Technical summary document.</p>
<p>Detail if any further improvements to site layout, design and fugitive emission control have been put in place following the audit detailed in your response.</p>	<p>Improvements were outlined within the amended Non-Technical summary document. These improvements include details on water cannons, dampening of surfaces, destocking of storage areas, details on improved pre-crushing process, extraction systems and wider dust suppression.</p>
<p>Provide details of systems and measures you have in place to ensure that your site is meeting the requirements of BAT 11 of the WT BATC with regards to the monitoring of annual consumption of water, energy, and the annual generation of residues and wastewater</p>	<p>The operator has stated that they monitor the annual consumption of water and energy via invoices. Raw materials are not used during the recycling process and that the generation of residues is also tracked.</p>
<p>Provide a response demonstrating compliance with BAT 23 of the WT BATC</p>	<p>The operator has stated they do not currently have a formal energy efficiency plan in place. A contractor will be installing a system which monitors energy consumption per activity. Following this, the operator has</p>

<p>along with section 8.1 of the Non-hazardous and inert waste: appropriate measures for permitted facilities, or a timescale within which the required plans will be provided.</p>	<p>stated they will develop a formal energy efficiency plan and they have requested an improvement condition do to this. IP2 has been included within the permit to address this BAT requirement.</p>
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