Permitting Decisions - Environment Agency Initiated Variation

We have issued an Environment Agency initiated variation for A303 IBA Facility operated by Fortis IBA 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/FB3805GN/V005.

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 Incineration, 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 Incineration (the BATC) was published on 12 November 2019 following a European Union wide review of BAT, implementing decision (EU) 2019/2010. 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 14/04/2023. 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 Incineration BAT Conclusions.

The notice required the operator to:

1. Confirm whether or not they are currently complying with the standards described in the relevant BAT Conclusion reference document providing a description of how they are meeting the standard.
2. Describe how and when they intend to comply with those standards that they are not meeting, as identified in paragraph 1, to ensure that they are fully compliant with relevant BAT Conclusions by 03/12/2023, being the date, referred to as the 'compliance date'.
3. Confirm:
   a) If they intend to cease operating any activity which would be in breach of the relevant new BAT Conclusion (BATC) after the compliance date, and the date by which they intend to cease operation;

      or,

   b) if they intend to continue operating in a manner which would fail to comply with the relevant new BAT Conclusion after the compliance date, what their justification for being allowed to do so is; and by what date they intend to come into full compliance, or a description of alternative measures to be adopted that will provide equivalent environmental protection.
   c) Where there is a BAT-Associated Emission Level (BAT-AEL) specified in the BAT conclusion, with which they will not comply with by the compliance date and they wish to continue operating, they should request a derogation. To do that, they must provide sufficient technical and commercial information to demonstrate that achieving these emissions levels would lead to disproportionately higher costs, compared to the environmental benefits, due to:
      i. the geographical location of their installation; or
      ii. the local environmental conditions around their installation; or
      iii. the technical characteristics of their installation.

      The operator is required to explain which of these criteria is relevant and why, refer to the relevant Defra's published guidance. Their justification of cost and benefits should use a methodology equivalent to that outlined in the Environment Agency Guidance risk assessment guidance.
4. Complete the WI BATCs operator returns spreadsheet and the accompanying tab titled "IBA AMs".

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 BAT Conclusions for Waste Incineration. 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 11/07/2023.

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.

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:

- Additional information received in response to questions 1 to 11 of the Request for Further Information (RFI) issued on the 08/02/2024, including document titled ‘A303 Request for information Feb 2024’.
- Updated version of the document referenced ‘A303 BATC Return Spreadsheet v2’ and ‘A303 IBA Environmental Permit Boundary & Site Layout Plan’, referenced FOR/EPB/02, dated 20/03/24.
- Updated version of the document referenced ‘P11 Stockpile Management Procedure 2024 v9’.

Changes to the permit conditions

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

- Condition 2.3.3 - raw materials or fuels condition has been added. The follow-on conditions have been renumbered.
- Condition 2.3.4 has been amended by changing the table reference from S2.1 to S2.2.
- Conditions 2.4.1 and 2.4.2 have been added to implement the improvement programmes associated with this variation.
- Condition 3.1.1 has been amended by removing ‘*except from the sources and emission points listed in schedule 3 table S3.1’* because there are no channelled emissions from the site.
- Conditions 3.6.1 – 3.6.4 of this variation have been added to implement the monitoring requirements introduced by this variation.
- Conditions 4.2.2 (b) and (c) have been amended by changing the numbering of the referenced tables.
- Condition 4.2.3 has been added because it is a relevant installation condition. The follow-on conditions have been renumbered.
- Table S1.1 as referenced in Condition 2.1.1 has been amended to clearly define the activities that are undertaken at the site and to apply relevant limits to them.
- Table S1.2 as referenced in Conditions 2.3.1 and 2.3.2 has been amended to incorporate operating technique documents submitted in response to the Regulation 61 Notice.
- Table S1.3 of the last variation (Pre-operational Measures) has been deleted given that the site is no longer in a pre0operational phase.

- Table S1.3 as referenced in Condition 2.4.1 has been added to implement the improvement conditions IC1 – IC4.
- Table S2.1 has been added to specific the raw materials that are allowed. The follow-on table has been renumbered.
- Table S3.1 as referenced in Conditions 3.5.1 (a) and 3.5.4 has been added for monitoring of moisture content.
- Table S3.2 as referenced in Conditions 3.5.1 (b) and 3.5.4 has been added for monitoring of dust in the ambient air.
- Table S4.1 as referenced in Conditions 4.2.3 (b) and (c) has been added to implement reporting of process and ambient air monitoring.
- Table S4.4 as referenced in Conditions 4.2.2 (c) and 4.2.3 (b) has been amended to include relevant forms.
- Schedule 6 as referenced in condition 4.4.1 has been amended by adding additional interpretations that are relevant to the changes made as a result of this variation and by updating some of the existing interpretations.

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 and brief non-technical description of the regulated facility	FC	The operator confirmed that the site operates ISO 14001 and ISO 9001 management systems that are externally audited annually to maintain standards. They indicated that they are undertaking the following activities - storage of waste pending recovery, Storage of processed materials, Storage of gas oil, Adblue and lubrication oils. Recovery and disposal of non-hazardous waste, process water collections and storage and surface water collection and storage. The site is located on an industrial area with a number of businesses nearby. The closest business is a skip recycling waste facility and there is a hotel within 500m of the site to the south, on the opposite side of the A303 dual carriageway. The nearest residential buildings are approx. 1.5km away to the North, and the nearest water course is the river Test which again is approx. 1.5km away to the North. The processing plant is made up of conveyors, screens and Eddy current separators (ECS). The screens and ECS's are contained within separate buildings, and the conveyors are all outside but each conveyor is fully covered. We have included Improvement Conditions IC2a and IC2b which requires the operator to carry out a detailed review of the existing waste treatment, storage and handling equipment at the site to ensure that they are in accordance with the requirements specified in the Non-hazardous and inert waste: appropriate measures for permitted facilities guidance and BAT 24 of the Waste Incineration BAT Conclusions. This includes installation of a new building or enclosure around the eddy current separator that is currently located outside, amongst other things.
Waste pre-acceptance, acceptance and tracking appropriate measures	CC	The operator confirmed as part of their waste acceptance procedure that IBA is stored on site until the incinerator operators confirm in writing that the IBA is non-hazardous. They stated that it is the responsibility of the incinerator operators to ensure that all analysis of samples is carried out by laboratories who are UKAS or MCERTs accredited.
Waste storage, segregation and handling appropriate measures	CC	The operator indicated that they are complying with the appropriate measures associated for waste storage, segregation and handling. They stated that they have a stockpile management procedure which ensures that IBA is stored separately pending test results and is removed from site if test results demonstrate that IBA is hazardous waste Unprocessed IBA is stored outside for a minimum of 6 weeks until moisture content is suitable for processing. IBAA is also stored outside for up to 12 weeks after treatment. The operator confirmed that they have sufficient contingency plans in place to deal with periods of disruption.

Waste treatment appropriate measures	FC	The treatment process involves separation of ferrous and non-ferrous metals from the IBA, grading of IBA into different sized fractions, and blending of IBA fractions to produce an IBAA which meets the relevant standard for the end-use. The treatment plant is made up of conveyors, screeners and four Eddy Current Separators (ECS). The screeners and three of the ECSs are contained within separate buildings. The fourth ECS is currently located outside but there is an improvement condition which requires the operator to relocate the fourth ECS into a building. The conveyors are all outside, but each conveyor is fully covered. We have included Improvement Conditions IC2a and IC2b which require the operator to carry out a detailed review of the existing waste treatment, storage and handling equipment at the site to ensure that they are in accordance with the requirements specified in the Non-hazardous and inert waste: appropriate measures for permitted facilities guidance and BAT 24 of the Waste Incineration BAT Conclusions and to install a new building or enclosure around the eddy current separator that is currently located outside, amongst other things.
Emissions control appropriate measures	FC	The operator indicated that there are no channelled emissions to air and no discharge points from site either to sewer or controlled waters. Fugitive emissions to air and groundwater are likely due to the nature of the waste and the current state of the site operations and infrastructure. We have included Improvement Conditions IC1, IC2a and IC2b which require the operator to submit a revised Dust Management Plan (DMP), and to carry out a detailed review of the existing waste treatment, storage and handling equipment at the site to ensure that they are in accordance with the requirements specified in the Non-hazardous and inert waste: appropriate measures for permitted facilities guidance and BAT 24 of the Waste Incineration BAT Conclusions and to install a new building or enclosure around the eddy current separator that is currently located outside, amongst other things. We have also included Improvement Conditions IC3a and IC3b which require the operator to cover the remaining areas of the site where IBA and IBAA are being handled, stored and/or treated with impermeable surfaces, sealed drainage and containment systems. Improvement Conditions IC4a and IC4b require the operator to review and ascertain the state of the site areas that are currently covered by an impermeable surface and sealed drainage systems and determine if the design and construction of the impermeable surface and sealed drainage systems are in line with or equivalent to the standards required in CIRIA Report C736.

Emissions monitoring and limits appropriate measures	CC	The operator indicated that there are no channelled emissions to air and no discharge points from site either to sewer or controlled waters. As a result, we have not included any channelled emission monitoring or BAT AEL limits in the permit. For fugitive emissions of dust, the site has 2 x real time dust monitors that send an alert whenever a set level is breached. These real time monitors are located on the northern side of the site nearest the IBA. It also has 4 directional dust monitors to monitor the direction in which the dust is either leaving or entering the site. These monitors are located to the North, East and 2 x to the South.
Raw Material, Process efficiency and Water Use appropriate measures	CC	Raw materials and water are not being used in the treatment process but water generated from the site is being used on site for dust emission control. The operator is complying with appropriate measures associated with process efficiency and water use.

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

Appropriate measures	Compliance status	Assessment of the installation's compliance with relevant standards (appropriate measures) and any alternative techniques proposed by the operator
BAT 1 - EMS	CC	The operator confirmed that the site operates ISO 14001 and ISO 9001 management systems that are externally audited annually to maintain standards.
BAT 3 - monitoring of specified process parameters	CC	The operator stated that they are complying with this BAT because *'no water is discharged from site, all wastewater is either reused on site or removed from site by registered waste carriers'.*
BAT 6 - monitor emissions to water from FGC and/or bottom ash treatment with at least the frequency given below and in accordance with EN standards	CC	The operator stated that they are complying with this BAT because *'no water is discharged from site, all wastewater is either reused on site or removed from site by registered waste carriers'.*
BAT 10 - quality output management system part of EMS where bottom ash treatment is carried out	CC	The operator indicated that a quality management system is in place at the site. The site operates ISO 14001 and ISO 9001 management systems that are externally audited annually to maintain standards.
BAT 12 - in order to reduce the environmental risks associated with the reception, handling and storage of waste, BAT is to use both of the techniques listed in the corresponding table	FC	Although the operator stated that measures in line with BAT 12 are in place and that the site has an impermeable surface which has a remediation programme to ensure the integrity of the surface and adequate capacity for the handling and storage of waste; our knowledge of the site is that the impermeable surface does not cover the whole area of the site that are used for waste handling, storage and treatment. In addition, the operator indicated that the existing impermeable surface is not designed to meet the standards outlined in the CIRIA 736 report. Based on this, we have included Improvement Conditions IC3a and IC3b which require the operator to cover the remaining

		areas of the site where IBA and IBAA are being handled, stored and/or treated with impermeable surfaces, sealed drainage and containment systems. Improvement Conditions IC4a and IC4b require the operator to review and ascertain the state of the site areas that are currently covered by an impermeable surface and sealed drainage systems and determine if the design and construction of the impermeable surface and sealed drainage systems are in line with or equivalent to the standards required in CIRIA Report C736.
BAT 23 - in order to prevent or reduce diffuse dust emissions to air from the treatment of slags and bottom ashes, BAT is to include in the environmental management system (see BAT 1) the diffuse dust emissions management features	FC	The operator confirmed that this BAT is relevant and that they are complying with it. They indicated that their EMS includes measures to identify and reduce and monitor diffuse dust emissions. They stated that they have a rain gun system for wetting down IBA and IBAA stockpiles, and a tractor and bowser to ensure the roads and smaller stockpiles are dampened down. Based on our knowledge of the site, we have included Improvement Conditions IC1, IC2a and IC2b which require the operator to submit a revised Dust Management Plan (DMP), and to carry out a detailed review of the existing waste treatment, storage and handling equipment at the site to ensure that they are in accordance with the requirements specified in the Non-hazardous and inert waste: appropriate measures for permitted facilities guidance and BAT 24 of the Waste Incineration BAT Conclusions and to install a new building or enclosure around the eddy current separator that is currently located outside, amongst other things.
BAT 24 - In order to prevent or reduce diffuse dust emissions to air from the treatment of slags and bottom ashes, BAT is to use an appropriate combination of the techniques in the corresponding table	FC	The operator confirmed that measures listed under sub-section **a, b, c, d and e** of BAT 24 table are in use at the site. They stated that the measures listed under sub-section **f** of BAT 24 table are not in use. They indicated that measure **f** is not in use because the moisture of the IBA is maintained between 14 - 18% and that the site ensures that there is no dry-discharge or low moisture IBA used when put through the processing plant. Based on our knowledge of the site, we have included Improvement Conditions IC1, IC2a and IC2b which require the operator to submit a revised Dust Management Plan (DMP), and to carry out a detailed review of the existing waste treatment, storage and handling equipment at the site to ensure that they are in accordance with the requirements specified in the Non-hazardous and inert waste: appropriate measures for permitted facilities guidance and BAT 24 of the Waste Incineration BAT Conclusions and to install a new building or enclosure around the eddy current separator that is currently located outside, amongst other things.
BAT 26 - use a bag filter if treating air from treatment of IBA under sub-atmospheric conditions.	NA	The operator stated that this BAT is not applicable because IBA is not being treated under sub-atmospheric conditions at the site.
BAT 32 - in order to prevent the contamination of uncontaminated water, to reduce emissions to water, and to increase resource efficiency,	NA	No water is discharged from site, all wastewater is either reused on site or removed from site by registered waste carriers.

BAT is to segregate waste water streams and to treat them separately, depending on their characteristics		
BAT 34 - in order to reduce emissions to water from FGC and/or from the storage and treatment of slags and bottom ashes, BAT is to use an appropriate combination of the techniques in the corresponding table, and to use secondary techniques as close as possible to the source in order to avoid dilution	NA	No water is discharged from site, all wastewater is either reused on site or removed from site by registered waste carriers.
BAT 36 - in order to increase resource efficiency for the treatment of slags and bottom ashes, BAT is to use an appropriate combination of the techniques in the corresponding table based on a risk assessment depending on the hazardous properties of the slags and bottom ashes.	CC	The following measures listed in the table of BAT 36 are used: **a, d** and **e**. The operator indicated that they are currently not using technique **b** because it will destroy the properties they are aiming to achieve in producing a saleable IBAA product. They are not using technique **c** (aeraulic separation) but are using manual sorting by hand instead. They are also not using technique **f** because the facility does not have the capability to wash IBA.
BAT 37 - in order to prevent or, where that is not practicable, to reduce noise emissions, BAT is to use one or a combination of the techniques in the corresponding table	CC	The operator confirmed that they are using all techniques listed in this BAT and that they are employed as part of their noise control procedure.
Reg. 61 Request for Further Information (RFI)	**Assessment of response received**	
Provide a detailed site layout plan that shows: ▪the locations of the waste storage and treatment activities, ▪locations of fugitive emission points, ▪locations of dust monitoring points, ▪locations of emission control measures, ▪the drainage routes and water management infrastructure	Drawing reference “A303 layout plan 2024” provided but this was an aerial photo of the site which does not meet the requirements. An updated version of the drawing - ‘A303 IBA Environmental Permit Boundary & Site Layout Plan’, referenced FOR/EPB/02, was submitted on the 20/03/24. This was considered acceptable.	

Provide information on the measures that you have in place to ensure that waste storage time and capacity are not exceeded.	The operator stated that each IBA contract has a tonnage limit of how much IBA is produced by the incinerator per year. They use this tonnage to project how much material they need to process each month and each year to ensure they remain within out permitted tonnage. Knowledge of how much IBA is on site also helps them to manage stockpiles correctly to ensure they are processed at the correct time.
Provide details of how your site is designed and laid out to prevent and/or reduce diffused dust emissions from your storage and treatment operation.	The operator indicated that there are 8m high bunds with densely planted trees around the back of the site where the IBA stockpiles are located that offer additional protection from any diffuse dust emissions leaving the site. They also stated that all major parts of the treatment process that requires the IBA to be disturbed is encased or enclosed within a building. Notwithstanding this, there is evidence that suggests that one of the ECS is currently located outside and as result we have added an improvement condition which requires the operator to relocate the fourth ECS into a building. We have included Improvement Conditions IC2a and IC2b which require the operator to carry out a detailed review of the existing waste treatment, storage and handling equipment at the site to ensure that they are in accordance with the requirements specified in the Non-hazardous and inert waste: appropriate measures for permitted facilities guidance and BAT 24 of the Waste Incineration BAT Conclusions and to install a new building or enclosure around the eddy current separator that is currently located outside, amongst other things.
What evidence do you have to demonstrate that a moisture content of 14 - 18% is suitable to ensure adequate control of fugitive emissions?	The operator responded by stating that they have experience of processing IBA for 14 years and a good understanding of what level of moisture that is required for the best performance of the treatment plant as well as to keep any potential diffused emissions to air to a minimum. While we acknowledge this, we have including process monitoring of moisture content in the permit to ensure that the diffuse emission potential of the IBA and IBAA is kept under control.
Do you experience 'moisture gradient' during your treatment and storage operations at your site?	In response, the operator indicated that the moisture content of the IBA is approximately 25% when it arrives on site. During the maturation period of a minimum of 6 weeks, the moisture of the IBA reduces to approximately 8% within the middle of the windrow. To increase the moisture content, the operator stated that they use the dust suppression cannons to spray water over the windrows so the outside stays at a moisture content of approximately 20%. Prior to the removal of the IBA from the windrows for processing, the operator identified they routinely create a wall behind the windrow to capture any loose dust particles and to move the wet IBA to the drier IBA to mix together to get a moisture of approximately 14%. By doing this they are able to control and maintain the moisture content during the handling and processing operations.
What is the moisture content of the waste at the various stages of your storage and treatment processes (i.e., from receipt of waste to final treatment point)?	As stated above, the operator recognises that the moisture content of the IBA changes from reception until the material is ready to be processed. The methods identified above ensure that once the material is fed into the treatment process, the moisture content remains the same. The operator has a procedure in place to add more water to the end of the process to ensure there are no diffuse emissions to air when the material drops into a stockpile as IBAA. The IBAA is stored until it is sold. While the IBAA is in storage, the moisture content continues to fall, and water is intermittently added to the stockpile through the water cannon systems and directly to the working face of the stockpile via tractor and bowser when loading onto lorries.

What stages of your treatment and storage operations would you consider to be the highest risk points of dust and what control measures do you have in place to mitigate the risk of dust emissions at those stages?	The operator indicated that the highest risk of dust emissions occurs when: (a) breaking out of the IBA windrows. (b) the material falls from the end conveyor into a stockpile of IBAA. and (c) the material is loaded into lorries. Mitigation measures regarding these stages of the treatment process are explained in the two rows above.
Provide us with a copy of your	A copy of the Stockpile Management Procedure was provided in response to the information request. This was updated on the 25/03/2024 with additional information to justify the storage capacity of the site at any one time.
Please confirm that the design of your impermeable surface, sealed drainage and any bunding arrangements at the site are suitable and in line CIRIA 736	The operator stated that site was designed and constructed before CIRIA 736 was published and that they consider the risk of failure of the system that they have in place at the site is low because they have not had any incident since the site commenced 14 years ago. Because it is difficult to assess the state of the site surface without relevant site investigation, we have included Improvement Conditions IC4a and IC4b. These require the operator to review and ascertain the state of the site areas that are currently covered by an impermeable surface and sealed drainage systems and determine if the design and construction of the impermeable surface and sealed drainage systems are in line with or equivalent to the standards required in CIRIA Report C736.
Is there any reason why the fourth ECS is located outside of the building?	The operator stated that the 4th ECS was installed in October 2020 as an addition to the existing plant to improve recovery. Due to the size of the existing building and having to house the other ECS's, it wasn't an option to put it inside the building. They located it as close to the building as possible to reduce the wind whipping effect across the ECS. To ensure that they are in accordance with the requirements specified in the Non-hazardous and inert waste: appropriate measures for permitted facilities guidance and BAT 24 of the Waste Incineration BAT Conclusions, we have added an improvement condition which requires the operator to relocate the fourth ECS into a building. We have included Improvement Conditions IC2a and IC2b which require the operator to carry out a detailed review of the existing waste treatment, storage and handling equipment at the site and to install a new building or enclosure around the eddy current separator that is currently located outside, amongst other things.
Provide details of the changes that you have made as a result of the complaints that you have received regarding the site? Are the changes effective in addressing the risk? Do you have an Odour Management Plan in place at the site?	The operator indicated that part of their procedure is to attend the area from where the complaint was made to try and gauge the level of odour whenever an odour complaint is received. Once this is done, they will then complete their online complaints system with all the information received from the complainant, together with the site visit and all operational details: wind direction, what operations we were carrying out etc. Although the site has Dust and Odour Management Plans, we have considered that there is a need for the site to update their existing Dust Management Plan have included Improvement Condition IC1 which requires the operator to submit a revised Dust Management Plan (DMP) to the Environment Agency for approval.