

## Permitting Decisions- Environment Agency Initiated Variation

---

We have decided to issue an Environment Agency initiated variation for PSH Environmental Ltd operated by PSH Environmental Ltd following a review of the permit in accordance with Environmental Permitting (England and Wales) Regulations 2016, regulation 34(1).

The variation number is EPR/WP3594NR/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

### **Regulation 61 Response**

The Regulation 61 notice response from the Operator was received on 08/04/2022.

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 request for further information (RFI) by email to the operator on the 11/01/2024. The operator replied on 01/02/24 providing answers to all of the questions posed.

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 and annex 1 spreadsheet titled
  - *'4. BAT conclusions & appropriate measures.*
  - *LT01 21023e (Response to 'Notice requiring information – non-hazardous installation permit review).*
- Documents received in response to the Request for Further Information titled:
  - *LT02 21023 (Request for more information – PSH Environmental Limited Regulation 61 response).*
  - *Waste Acceptance Procedures V2.*
  - *Site Layout Plan 21\_023k 001 V2-merged.*

### **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:

<b>Conditions</b>	<b>Amendment</b>
Condition 2.3.4	Addition of reference to table S2.4 list of wastes table.
Condition 2.4.1	Hazardous waste - added in line with modern template.
Conditions 2.4.1 and 2.4.2 of the previous variation	WEEE Storage – conditions have been deleted. Appropriate WEEE restrictions have been added to table S1.1.
Conditions 3.1.1, 3.1.2 and 3.1.3	Emissions conditions added for relevant emissions to land/ground water. The follow-on conditions have been renumbered.
Conditions 3.5.1, 3.5.2, 3.5.3 and 3.5.4	Monitoring conditions added for relevant emissions monitoring. The follow-on conditions have been renumbered.
Table S1.1 as referenced in condition 2.1.1	Amended by updating the activities and appropriate restrictions, removal of descriptions of the DAAs and AR5 of the previous variation has been combined with the previous exempt activity to create the new AR5.
Table S1.2 as referenced in condition 2.3.1	Operating techniques updated to include Regulation 61 response and Request for Further Information response.
Table S1.3 as referenced in condition 2.4.1	Addition of improvement programmes IC1 – IC7 and removal of historic improvement conditions that have been completed.
Table S2.1 as referenced in condition 2.3.3	Addition of raw materials and fuel descriptions.
Table S2.3 as referenced in condition 2.3.4	Amended by removing WEEE and battery related EWC codes. These codes have been added to the new list of waste table – Table S2.4.
Table S2.4 as referenced in condition 2.3.4	Addition of new list of wastes table for new waste activity AR5.
Table S3.1 as referenced in condition 3.1.1	Emission limits and monitoring added for waste water draining from site via soakaway lagoon.
Table S4.1 as referenced in condition 4.2.3	Reporting added for emissions to soakaway lagoon.
Table S4.2 as referenced in condition 4.2.2 (b)	Addition of parameters for production and treatment.
Table S4.3 as referenced in condition 4.2.2 (c)	Addition of performance parameters, raw material usage.
Table S4.4 as referenced in condition 4.2.3 (b)	Reporting form for added/updated.

Schedule 5 as referenced in conditions 4.3.2 and 4.3.4 has been amended	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

**Table 1 – Summary of our assessment of the operator’s Reg 61 response**

<b>Appropriate measures</b>	<b>Compliance status</b>	<b>Assessment of the installation’s compliance with relevant standards (appropriate measures) and any alternative techniques proposed by the operator</b>
<b>General management appropriate measures</b>	CC	The operator stated that they are in compliance with this section of the appropriate measures and indicated that all of the relevant management documents are in place.
<b>Waste pre-acceptance, acceptance and tracking appropriate measures</b>	CC	The operator stated that they are compliant with this section of the appropriate measures. No waste acceptance or pre-acceptance procedures were provided. This was requested and received as part of the RFI.
<b>Waste storage, segregation and handling appropriate measures</b>	FC	<p>The operator stated that they are compliant with this section of the appropriate measures. A number of questions have been asked about waste storage and how these procedures protect the environment and prevent the contamination of water stream.</p> <p>To address the shortcomings, Improvement Conditions IC4 and IC5 have been added which require the operator to undertake a review of waste storage and treatment areas to ensure they are compliant with the appropriate measures. Where these practices are not in compliance, the operator is required to identify and implement improvements approved by the Environment Agency. Upon completion of the Improvement Conditions, there must be no mechanism for contaminated waters to enter the soakaway drainage.</p> <p>As there have been changes to site operations and the current Fire Prevention Plan has been identified as out of date, Improvement Condition IC7 has been included within the permit which requires the submission of an updated FPP for approval.</p> <p>Improvement Conditions IC2 and IC3 have also been included within the permit to ascertain the state and design of the impermeable surfaces and drainage system on site and to confirm that they are in line with CIRIA 736 or equivalent standard. The operator is required to identify and implement any improvements required to the surfacing or drainage.</p>
<b>Waste treatment appropriate measures</b>	CC	The operator confirmed that they currently meet the requirements of the appropriate measures in this section.
<b>Emissions control appropriate measures</b>	FC	<p>The operator confirmed that they are compliant with this section of the appropriate measures. Waste treatment is carried out within buildings which limits the creation of fugitive emissions. There are no point source emissions to air from the operations on site.</p> <p>There are emissions to a soakaway lagoon from the site surface water. Monitoring of visible oil and grease have been added in Table S3.1 of the permit. There is no inventory of emissions for these discharges as they do not fall within scope as neither a direct or indirect discharge to surface water. The operator indicated that wastes which may come into contact with the waters are generally inert.</p>

		<p>IC4 and IC5 have been added which require the operator to undertake a review of waste storage and treatment areas to ensure they are compliant with the appropriate measures. Where these practices are not in compliance the operator must identify and implement improvements approved by the Environment Agency. Upon completion of the Improvement Conditions, there must be no mechanism for contaminated waters to enter the soakaway drainage.</p> <p>Improvement Conditions IC2 and IC3 have also been included within the permit to ascertain the state and design of the impermeable surfaces and drainage system on site and to confirm that they are in line with CIRIA 736 or equivalent standard. The operator is required to identify and implement any improvements required to the surfacing or drainage.</p>
<b>Emissions monitoring and limits appropriate measures</b>	CC	<p>The operator confirmed that they are compliant with this section of the appropriate measures. There are no point source emissions to air from the operations on site.</p> <p>There are emissions to soakaway from the site surface water. Monitoring of visible oil and grease have been added in Table S3.1 of the permit.</p>
<b>Process efficiency appropriate measures</b>	FC	<p>The operator confirmed that they meet the requirements of this sections of the appropriate measures with exception of:</p> <ul style="list-style-type: none"> <li>An energy efficiency plan</li> </ul> <p>The requirement for the operator to submit an energy efficiency plan has been incorporated into the permit under the improvement condition, IC1.</p>
<b>Regulation 61 Requirement</b>	<b>Compliance status</b>	<b>Assessment of the installation's compliance with relevant standards (appropriate measures) and any alternative techniques proposed by the operator</b>
BAT 1 - EMS	CC	The operator responded by stating they are compliant with this BATC. A management system is in place for site.
BAT 2 - Waste pre-acceptance, acceptance and tracking appropriate measures	CC	The operator confirmed that they have waste acceptance procedures. These documents were provided as part of the RFI response.
BAT 3 - Inventory of wastewater and waste gas streams	CC	There are no channelled emissions to air from the site. There are emissions to soakaway from site surface water. There is no inventory of emissions for waste water as no applicable waste water is generated on site that would require this. There are no direct or indirect discharges to surface water.
BAT 4 - Storage procedures	FC	The operator confirmed that they have storage procedures in place at the site and confirmed they are compliant with this BAT requirement.



		<p>Throughout the course of the review a number of questions and concerns were raised about waste storage on site and the returned information was not always clear. Waste storage practices have also been raised as a concern by area staff.</p> <p>Waste storage improvement conditions have been included within the permit. IC4 and IC5 have been added requiring the operator to undertake a review of waste storage and treatment areas to ensure they are compliant with the appropriate measures. Where these practices are not in compliance, the operator is required to identify and implement improvements approved by the Environment Agency. Upon completion of the Improvement Conditions, there must be no mechanism for contaminated waters to enter the soakaway drainage.</p> <p>As there have been changes to site operations and the current Fire Prevention Plan has been identified as out of date, IC7 has been included within the permit which requires the submission of an updated FPP for approval.</p> <p>Improvement Conditions IC2 and IC3 have also been included within the permit to ascertain the state and design of the impermeable surfaces and drainage system on site and to confirm that they are in line with CIRIA 736 or equivalent standard. The operator is required to identify and implement any improvements required to the surfacing or drainage.</p>
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	CC	<p>The operator responded stating that this BATC is not relevant to their operation. There are no emissions to air requiring monitoring and there are no point source discharges of waste water to surface water or sewer. Within their response to the RFI they stated that <i>“the potential for the wastewater discharge to be contaminated is very low since surface water from the storage of construction / demolition waste could be allowed to percolate down through a hardstanding surface.”</i></p> <p>Monitoring has been added for the surface water emissions to soakaway/ground for visible oil and grease only. It is expected that if waste is stored in compliance with the permit and operating techniques contaminated waste waters should not be generated. Non-hazardous wastes should be stored in secured containers which prevent the ingress of water and escape of waste.</p>
BAT 7 - monitor emissions to water	CC	<p>The operator responded by stating that this BATC is not relevant to their operation. There are no point source discharges of waste water to surface water or sewer that would require monitoring. Within their response to the RFI they stated that <i>“the potential for the wastewater discharge to be contaminated is very low since surface water from the storage of construction / demolition waste could be allowed to percolate down through a hardstanding surface.”</i> Monitoring has been added for the surface water emissions to soakaway/ground for visible oil and grease only. It is expected that if waste is stored in compliance with the permit and operating techniques contaminated waste waters should not be generated. Non-hazardous wastes should be stored in secured containers which prevent the ingress of water and escape of waste.</p>

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	CC	The operator responded that they are compliant with the requirements of this BATC. There is a potential risk from odour emissions from site due to the nature of the waste accepted and the treatment operations. Odour is managed through odour control procedures which include storage restrictions of a maximum of 48 hours prior to processing, treatment within buildings and odorous loads not being deposited until the unit doors are closed.
BAT 11 - monitor consumption of water, energy and raw materials, and generation of residues and wastewater	CC	The operator responded that they are compliant with the requirements of this BATC. 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	CC	The operator responded that they are compliant with the requirements of this BATC. There is a potential risk from odour emissions from site due to the nature of the waste accepted and the treatment operations. An approved Odour Management Plan is included within the operating techniques table of the permit.
BAT 13 - reduce odour emissions	CC	The operator responded that they are compliant with the requirements of this BATC. There is a potential risk from odour emissions from site due to the nature of the waste accepted and the treatment operations. Odour is managed through odour control procedures which include storage restrictions of a maximum of 48 hours prior to processing, treatment within buildings and odorous loads not being deposited until the unit doors are closed.
BAT 14 - reduce diffuse emissions to air	CC	The operator responded by stating that they are compliant with the requirements of this BATC. Wastes which are likely to generate dust are stored and treated within buildings. For wastes stored outside, water misting spray can be employed to minimise the risk of fugitive dust emissions.
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 responded by stating that they are compliant with the requirements of this BATC. Within their response, it is highlighted that there is a potential for noise generation as part of the operations but the scale and nature of the activities plus the operations being within buildings are

		considered to limit the risk. Based on our internal noise screening, a noise impact assessment and noise management plan are not required.
BAT18 - reduce noise and vibration emissions	CC	The operator responded by stating that they are compliant with the requirements of this BATC. Within their response, it is highlighted that there is a potential for noise generation as part of the operations but the scale and nature of the activities plus the operations being within buildings are considered to limit the risk. Based on our internal noise screening, a noise impact assessment and noise management plan are not required.
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. It was not clear from their response how the requirements of BAT19 were being met on site. The nature of the waste being stored externally and how the drainage on site functioned were also unclear. Further information was requested, and clarity was provided by the operator in their response. It was detailed that all waters drain via the soakaway lagoon on site. Waters pass through an interceptor before entering the lagoon. Wastes stored externally, in compliance with the permit, are stored on site and are either contained, wrapped or inert in nature. These wastes are stored on an impermeable surface and any water from the external waste storage areas is channelled to the soakaway lagoon via an interceptor.</p> <p>Waste storage improvement conditions have been included within the permit. IC4 and IC5 have been added which require the operator to undertake a review of waste storage and treatment areas to ensure they are compliant with the appropriate measures. Where these practices are not in compliance the operator must identify and implement improvements. Upon completion of the Improvement Conditions, there must be no mechanism for contaminated waters to enter the soakaway drainage.</p> <p>Improvement Conditions IC2 and IC3 have also been included within the permit to ascertain the state and design of the impermeable surfaces and drainage system on site and to confirm that they are in line with CIRIA 736 or equivalent standard. The operator is required to identify and implement any improvements required to the surfacing or drainage.</p>
BAT 20 - waste water treatment	CC	The operator detailed that the requirements of this BATC were not relevant to their operation. Again, further information was required and requested via RFI. Following the detail supplied within the RFI response, it was agreed that there is no requirement for waste water treatment from operations on site.
BAT 21 - prevent or limit the environmental consequences of accidents and incidents	CC	The operator has detailed 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 processing of RDF activity. 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	<p>The operator has detailed within their response to the RFI that they will prepare any plans necessary for compliance with this BAT.</p> <p>We have included improvement condition IC1 which requires the operator to submit an energy efficiency plan. This has been done in accordance to the request by the operator in their response to the RFI.</p>
BAT 24 - maximise reuse of packaging	CC	The operator has detailed that they are compliant with this BAT requirement.
BAT 25 - General - Emissions to air (Techniques to reduce plus AEL for dust).	N/A	There are no channelled emissions of dust from the operations at the site. This was confirmed by the operator in their response to the RFI. As such, we have considered that this BATC is not relevant to the site operations.
BAT 26 - Metal shredders (Reduce accidents & incidents)	N/A	The installation is for the mechanical processing of waste to produce RDF. There is no treatment in shredders of metal waste, including WEEE and ELVs and their components and as such we agree that BAT 26 does not apply.
BAT 27 - Deflagrations (Prevent & reduce emissions from deflagrations)	N/A	The installation is for the mechanical processing of waste to produce RDF. There is no treatment in shredders of metal waste, including WEEE and ELVs and their components and as such we agree that BAT 27 does not apply.
BAT 28 - Energy efficiency (Shredder feed stability)	N/A	The installation is for the mechanical processing of waste to produce RDF. There is no treatment in shredders of metal waste, including WEEE and ELVs and their components and as such we agree that BAT 28 does not apply.
BAT 29 - WEEE containing VFCs and/or VHCs (Emissions of organic compounds to air including AELs)	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 of waste to produce RDF. We consider these treatment activities as mechanical treatment.
<b>Reg. 61 Request for Further Information (RFI) Assessment of response received</b>		
S1 Exemption use. Confirm if an S1 exemption is in use at site and if so, what wastes are being stored under this exemption.	<p>The operator responded that there are currently registered exemptions for S1 and S2 at the site. The S1 is not being used however the S2 is in use. A variation is being sought to add a number of waste codes under this exemption to the permit. As part of the permit review, we regularise any exemption use on permitted sites. As such, a new waste activity has been added to the permit for the storage and transfer of the waste codes previously received under the S2 exemption:</p> <ul style="list-style-type: none"> <li>• 08 01 12 waste paint and varnish other than those mentioned in 08 01 11.</li> <li>• 08 03 18 waste printing toner other than those mentioned in 08 03 17.</li> <li>• 16 01 17 ferrous metal.</li> <li>• 16 01 18 non-ferrous metal.</li> <li>• 16 01 19 Plastic.</li> <li>• 16 01 20 Glass.</li> <li>• 16 06 01* lead batteries.</li> <li>• 20 01 28 paint, inks, adhesives, and resins other than those mentioned in 20 01 27.</li> <li>• 20 01 33 batteries and accumulators included in 16 06 01, 16 06 02 or 16 06 03 and unsorted batteries and accumulators containing these batteries.</li> </ul>	
Provide further information on how you satisfy the requirements of BAT Conclusion (BATc) 19.	<p>The operator provided further and greater detail on how site drainage is laid out. All waters are discharged to the soakaway via interceptor. It was stated that "<i>Wood, plastic, textiles, mixed metals, paper, and cardboard are stored in covered skips on the impermeable surface of the operational area, in accordance with table S1.1, activity reference AR4 of the permit.</i>" and "<i>Construction / demolition waste is stored outside uncovered in accordance with the Permit Schedule 1 Operations table S1.1.</i>" The operator has given this explanation to demonstrate that they are compliant with BAT19. Details provided in this response have been superseded by a response to a second RFI.</p> <p>The operator clarified upon response to the second RFI that in fact all surface water drains to the lagoon and the lagoon is a soakaway. This is the only soakaway on site. The operator detailed that some wastes are also stored in storage bays where water collects and is pumped out where necessary.</p> <p>This led to the inclusion of IC4 and IC5 to ensure that wastes are stored on site in an appropriate manner in line with the appropriate measures and that contaminated waters don't flow to the soakaway lagoon.</p>	
Confirm clearly the waste types that you are storing outside. Are wastes stored outside generated from the installation activity or waste operation?	<p>The operator provided details on the wastes that they are storing outside and clarify how the wastes are stored. Further information was provided under the second RFI to detail that there are non-hazardous wastes being stored in storage bays.</p>	

	This led to the inclusion of IC4 and IC5 to ensure that wastes are stored on site in an appropriate manner in line with the appropriate measures and that contaminated waters don't flow to the soakaway lagoon.
Identify the locations of both the soakaway and interceptor on a site layout plan.	An updated site plan was provided detailing the locations of the soakaway drainage infrastructure on site. This has since been superseded by a response to a second RFI. The final outcome is that a drainage plan has been provided detailing the surface water drainage. This shows that all drains lead to the soakaway lagoon and that this is the only soakaway on site.
Provide details of your waste inventory (incorporating information about the characteristics of the waste water stream) and monitoring of the key parameters as required under BATc's 3, 6 and 7 of the Waste Treatment BAT Conclusions.	A waste water inventory was not provided and is not in place for the site. The operator felt that this requirement was not applicable as there are no point source discharges of waste water to surface water or sewer. Their response stated " <i>No information about the characteristics of the waste-water streams produced by the site has been obtained by the Operator. The only waste that water will come into contact with is non-hazardous construction and demolition waste.</i> " As this water would drain via the soakaway lagoon and not to surface water or sewer, it is agreed that in this circumstance there is presently no requirement to maintain an inventory of emissions on site.
Based upon the answers to question 5 above, review your response to BATc 20 and provide details on whether waste water treatment is required for the surface run off before it can be discharged.	Similarly to the above question, the operator outlined that BAT 20 is not relevant as there is no treatment of waste water required.
Provide waste pre-acceptance and acceptance procedures.	The operator responded by stating " <i>Copies of the waste pre-acceptance and acceptance procedures included in the EMS have been provided, see Annex 2.</i> " These were provided, assessed and incorporated in Table S1.2 of the permit.
Provide an energy efficiency plan and energy balance record or a timescale by which one will be in place for your operation.	The operator responded by requesting that this requirement be included within the permit as an improvement condition. IC1 has been included requiring the update of the sites EMS to include the relevant plans: <ul style="list-style-type: none"> <li>• Energy efficiency plan</li> <li>• Energy balance record</li> </ul>
<b><u>RFI 2</u></b>	
Provide a clear drainage plan for site.	The operator provided the following in response " <i>Apologies for the conflicting information that has been given regarding the drainage on the Site to date. The information previously provided was in relation to the old drainage system. The drainage system on the Site has recently been significantly improved.</i> "

	<p><i>“The surface water drains are laid to fall towards the soakaway (lagoon). To confirm, the only soakaway on the Site is the lagoon. Before surface water enters the soakaway, surface water goes through an interceptor (labelled as a storm separator on the Drainage Plan), located to the east of the soakaway.”</i></p> <p>The operator also detailed some waste storage practices on site <i>“The storage bays are constructed of an impermeable concrete surfacing and concrete walls. The ground level of the bay falls towards the back wall of the bay. Therefore, surface water is contained towards the back of the bay, it does not enter the drainage system. If there was a heavy downfall and there was a risk that surface water would escape the bays, then this water would be pumped out and removed from Site by M Gaze Limited.”</i></p> <p>This led to the inclusion of IC4 and IC5 to ensure that wastes are stored on site in an appropriate manner in line with the appropriate measures and that contaminated waters don’t flow to the soakaway lagoon.</p>
<p>Provide details on the depth and design of any soakaways on site.</p>	<p><i>“The only soakaway is the soakaway (lagoon) located in the northwestern corner of the Site, see Appendix 1 Drainage General Arrangement Plan Drawing No. PSRH-CF-XX-XX-DR-A-7100 (Drainage Plan).</i></p> <p><i>The soakaway is approximately 1.5m in depth, with 1:3 sloped sides. The soakaway has a volume of approximately 1400m<sup>3</sup>.”</i></p> <p>This information was provided to the Environment Agency as part of an assessment of the risk to groundwater from the site. This assessment led the inclusion of IC4 and IC5 to ensure that wastes are stored on site in an appropriate manner in line with the appropriate measures and that contaminated waters don’t flow to the soakaway lagoon.</p>
<p>Provide details on the design, the construction specification, and standards of the lagoon.</p>	<p><i>“The soakaway (lagoon) has been built in accordance with Appendix 2 Drainage Details Sheet 2 Drawing No. PSRH-CF-XX-XX-DR-A-7401.Fina</i></p> <p><i>At the base of the lagoon, there is a permeable liner made out of non-woven geo-textile material. On top of the permeable liner, there is a layer of topsoil (300mm). The purpose of the topsoil is to allow the planting of shrubs. Then, there is a layer of coir biodegradable mesh on top of the topsoil layer.”</i></p> <p>This information was provided to the Environment Agency as part of an assessment of the risk to groundwater from the site. This assessment led the inclusion of IC4 and IC5 to ensure that wastes are stored on site in an appropriate manner in line with the appropriate measures and that contaminated waters don’t flow to the soakaway lagoon.</p>