

Permitting Decisions - Environment Agency Initiated Variation

We have issued an Environment Agency initiated variation for Avonmouth IBA Recycling Facility operated by Day Group 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/DP3332JX/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.

Use of Quality protocol aggregates

A Directly Associated Activity (DAA) AR4, has been included within the permit to cover the blending of aggregates with incinerator bottom ash aggregate (IBAA). This DAA covers the blending of IBAA with virgin aggregate and other non-waste aggregate such as quality protocol compliant (QP) aggregates. In this instance the Environment Agency has concluded that QP compliant aggregate being brought onto site is destined for use as a sub-base in construction and that falls into one of the listed end uses in Section 4 of the Aggregates Quality Protocol. The Environment Agency concluded if the aggregate is produced in accordance with the QP and satisfies the other requirements stated within the QP it could be considered to have met end of waste. It can then be imported and stored at the blending site as a non-waste, which is in this instance Avonmouth IBA Recycling Facility. Further to this the IBAA blending site is not required to declare the

imported QP compliant aggregate on their waste returns. However, on blending that aggregate with IBAA, the resultant mixed material will be considered a waste and be subject to waste controls.

Emissions to air

An emission point for a direct emission has been added to the permit. This emission is for the fan and fan stack which is connected to the wet scrubber extraction system fitted to the IBA feed hopper. No emission limits have been included for this emission. The extraction system is a best practice approach applied by the operator and not a requirement of BAT. Air extraction is only a requirement under part (f) of BATC 24 where dry-discharged or low-moisture bottom ashes are being treated. Day Group are not treating low-moisture IBA. Under the definition of BATC 26 the BAT-AEL for dust only applies to extraction systems fitted with a bag filter. As the extraction system in this instance is fitted with a wet scrubber to capture dust the 5 mg/Nm³ limit does not apply.

Regulation 61 Response

The Regulation 61 notice response from the operator was received on 12/07/2023.

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:

Documents titled:

- *“BATC Return Spreadsheet Avonmouth 12 July 2023”*
- *Points 4.a and 13 of “Avonmouth Reg 61 Response Appropriate Measures”*
- *“Method Statement Processing of IBA (Avonmouth)”*
- *“IBA Acceptance Quarantine and Production Recording”*
- *Response to questions 1,2,3,4,8 & 9 of “Reg 61 Further Information Avonmouth Dp3332JX.pdf”*
- *Updated dust management plan – “Avonmouth DMP v5”*
- *Section 4.2 of “Environmental Management Plan v6”, Dust and Vapour Extraction*

Drawings

- *“AV001-32 Rev 2 Site Drainage Plan”*

- “AV001-42 rev 2 Drainage Layout”
- “AV001-174 Rev0 Emissions Management Plan”
- “AV001-101 Rev1 Site Layout Plan EA Permit”

Changes to the permit conditions

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

Conditions	Amendment
Condition 2.4	Improvement programme conditions removed as there are no improvement conditions within the permit.
Condition 3.1.1	Wording amended to add reference to table S3.2.
Conditions 3.2.2 (a) and (b)	Added in line with the modern template. Subsequent condition re-numbered.
Conditions 3.5.1 (b) and (d) and 3.5.4	Addition of point source emissions to air table S3.1, amendment of point source emissions to sewer table S3.2 and addition of process monitoring table S3.3 with adjustments to stated conditions to match the addition of these tables.
Condition 4.3.2	Wording updated to match modern template.
Condition 4.3.4	Wording updated to match 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 updated with documents received in response to the regulation 61 review.
Table S3.1 as referenced in condition 3.5.1 (a) and 3.5.4	Emissions to air added.
Table S3.2 as referenced in condition 3.5.1 (a) and 3.5.4	Emissions to sewer updated in-line with BAT.
Table S3.3 as referenced in condition 3.5.1 (a) and 3.5.4	Process monitoring added in line with modern template. Subsequent table numbering adjusted.
Table S4.1 as referenced in conditions 4.2.3	Table has been amended to implement reporting of emissions to sewer and process monitoring.

Table S4.3 as referenced in condition 4.2.2 (c)	Table has been amended to add reporting of energy usage and water usage.
Table S4.4 as referenced in conditions 4.2.2 (c) and 4.2.3 (b)	Table has been amended to include relevant forms.
Schedule 6 as referenced in condition 4.4.1	Schedule 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
<p>General management appropriate measures and brief non-technical description of the regulated facility</p>	<p>CC</p>	<p>The operator confirmed that the company is certified to ISO 14001 and ISO 9001, the site operates a management system within this with site specific elements.</p> <p>The site activities include:</p> <ul style="list-style-type: none"> ▪ S5.4 A(1) (b) (iii) - Recovery or a mix of recovery and disposal of non-hazardous waste with a capacity exceeding 75 tonnes per day involving treatment of slags and ashes. ▪ Storage of waste Incinerator Bottom Ash (IBA) prior to treatment. ▪ Storage of recovered IBAA and residual waste after treatment. ▪ Blending of IBAA fractions with virgin/primary aggregates. ▪ Collection of uncontaminated roof and surface water for reuse at site or discharge to sewer. ▪ Collection and storage of contaminated water for reuse on site or discharge to sewer. <p>The installation is located at Avonmouth Docks with a number of businesses nearby. The nearest residential housing is at King Street, approximately 50 metres southeast from the boundary of the installation. Other residential housing on Kings Street is within 100 metres and the nearest housing on Richmond Terrace is approximately 120 metres away. Other industrial sites are immediately to the north of the installation.</p> <p>The processing plant is made up of vibrating screens, over-band magnets, trommeling, eddy current separation and manual picking. Material is transported via enclosed conveyors. Processing of IBA takes place in enclosed buildings. There is a channelled emission to air. There are discharges to foul sewer.</p> <p>The treatment and storage areas have an impermeable surface with a sealed drainage system. Surface waters flow to a number of collection features such as gullies or settlement pits. The outfalls from gullies and settlement pits discharge via sealed pipework to the foul sewer network outside the site boundary.</p>
<p>Waste pre-acceptance, acceptance and tracking appropriate measures</p>	<p>CC</p>	<p>The operator has submitted a waste acceptance, quarantine and production recording procedure and outlined that they follow the voluntary industry protocol to provide reliable classification and assessment of the IBA.</p> <p>The incoming waste IBA is windrowed in the storage building and marked with the relevant date, source and sample reference supplied by the Energy from Waste (EFW) facility. IBA is stored in this fashion while awaiting results of the classification.</p> <p>A process is in place if a hazardous result were to be received to ensure that this material would be removed from site.</p>

<p>Waste storage, segregation and handling appropriate measures</p>	<p>CC</p>	<p>The operator has provided a waste acceptance, quarantine and production recording procedure and a Method Statement Processing of IBA (Avonmouth).</p> <p>These show that IBA is stored separately in windrows pending test results (as above) and is removed from site and taken to a suitably authorised facility if test results demonstrate that IBA is hazardous waste.</p> <p>Unprocessed IBA is stored within the building for 2 to 4 weeks prior to treatment. IBAA is also stored outside for up to 4 weeks after treatment. The operator confirmed that waste will only be accepted on site if there is sufficient storage capacity.</p> <p>IBAA is stored outside within 3 sided bays, these bays benefit from dust suppression to limit the risk of fugitive emissions.</p>
<p>Waste treatment appropriate measures</p>	<p>CC</p>	<p>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 IBAA (coarse IBAA 4-32mm and fine IBAA 0-4mm) which meets the relevant standard for the end-use. Blending of IBAA with aggregate material also takes place on site.</p> <p>The processing plant is made up of vibrating screens, over-band magnets, trommeling, eddy current separation and manual picking. Material is transported via enclosed conveyors. Processing of IBA takes place in enclosed buildings.</p> <p>The operator has identified the emissions and taken measures to control them. There is a channelled emissions to air from the air extraction system fitted to the IBA feed hopper. There are discharges of contaminated and uncontaminated waters to foul sewer.</p>
<p>Emissions control appropriate measures</p>	<p>CC</p>	<p>The operator initially indicated that there were no channelled emissions to air. Through the process of drafting the permit however it became clear that there was an extraction system on the feed hopper. This dust extraction system is connected to a water scrubber which removes dust from the air. This system does have a channelled emission which is vented through a fan and fan stack. The emission point is now listed in the permit. The site does have indirect discharges to foul sewer. Waters are generated from the storage areas where processed wastes are stored outside. This water is channelled to settlement areas before discharge to sewer. Water is also generated where it falls on the yard, building roof or treatment area where waste treatment is undercover, this water is released to wider surface water drainage which ultimately flows into foul sewer. Water can be reused on site in dust suppression systems.</p> <p>The operator provided analysis of the discharges and has stated “<i>We propose to continue with monthly monitoring against the BAT requirements until otherwise agreed with the EA.</i>” The BAT AEL’s for indirect discharges to sewer have been added to the permit.</p>

		The area officer has indicated that there are no issues with fugitive emissions at the site.
Emissions monitoring and limits appropriate measures	CC	<p>The operator initially indicated that there were no channelled emissions to air. Through the process of drafting the permit however it became clear that there was an extraction system on the feed hopper. This dust extraction system is connected to a water scrubber which removed dust from the air. This system does have a channelled emission which is vented through a fan and fan stack. The emission point is now listed in the permit. The site does have indirect discharges to foul sewer. Waters are generated from the storage areas where processed wastes are stored outside. This water is channelled to settlement areas before discharge to sewer. Water is also generated where it falls on the yard, building roof or treatment area where waste treatment is undercover, this water is released to wider surface water drainage which ultimately flows into foul sewer. Water can be reused on site in dust suppression systems.</p> <p>The operator provided analysis of the discharges and has stated “<i>We propose to continue with monthly monitoring against the BAT requirements until otherwise agreed with the EA.</i>” The BAT AEL’s for indirect discharges to sewer have been added to the permit.</p> <p>The area officer has indicated that there are no issues with fugitive emissions at the site.</p>
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 company is certified to ISO 14001 and ISO 9001, the site operates a management system within this with site specific elements.
BAT 3 - monitoring of specified process parameters	CC	<p>The operator responded indicating that this BAT was not applicable as “<i>We do not consider our process to release any process emissions to air and water.</i>” The EA consider this BAT relevant as there are discharges of process water from site. Waste water for bottom ash treatment plants as detailed in the BAT conclusion, covers water which is produced at any point of the operation inclusive of waste storage.</p> <p>In line with BAT flow, PH and conductivity should be measured from the sites discharges. This permit variation will incorporate PH and conductivity but not flow (as the discharges are not continuous discharges) into the installation permit.</p>

<p>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</p>	<p>CC</p>	<p>The operator responded stating that monitoring was being carried out in line with BAT and that they propose to continue with monthly monitoring in line with BAT.</p> <p>The relevant monitoring parameters have been included within the permit.</p>
<p>BAT 10 - quality output management system part of EMS where bottom ash treatment is carried out</p>	<p>CC</p>	<p>The operator indicated that a quality management system is in place at the site. The site operates ISO 14001 and ISO 9001 and all IBAA products are tested to relevant highways specifications.</p>
<p>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</p>	<p>CC</p>	<p>The operator stated they are complaint with this BAT and provided an Impermeable Surfaces Design statement to demonstrate the standards to which the surfaces are engineered. Further information was provided at RFI where drawings were provided and the statement “<i>This design complies with CIRIA c736 as confirmed by our internal Engineering Department.</i>” was made.</p> <p>It was highlighted within the design statement that concrete upstands needed to be installed. This has been done and evidence provided.</p>
<p>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</p>	<p>CC</p>	<p>The operator has stated that their EMS includes the features listed under BAT 23 to identify, reduce and monitor diffuse dust emissions. A Dust and Emissions Management Plan is also in place for site with controls on emissions of dust.</p> <p>Based on the information the operator has given, treatment takes place in an enclosed system and storage is within the IBA reception building. IBAA is stored in bays outside with dust suppression available.</p>
<p>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</p>	<p>CC</p>	<p>The operator confirmed that measures listed under sub-section a, c, d and e of BAT 24 are in use at the site. They have also stated that “<i>(f) is stated as only applicable to low moisture bottom ashes. All incoming ash is quenched and the process is deemed semi-dry</i>” and therefore this is deemed to be not applicable. They indicated that IBA is delivered with a moisture content of around 18-20%. Whilst onsite IBA is monitored for moisture and that there is a Dust Management Plan in place to prevent any fugitive emissions.</p> <p>The operator stated that point b of the BAT 24 is not in use as this is not possible where the bay walls for the IBAA storage bays are installed. The walls protect the stockpiles from wind whipping and the conveyors cannot be adjusted as they feed over the top of the walls. The discharge conveyors are fitted with rubber chutes and mist halos to prevent fugitive dust emissions from this point.</p>

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, BAT is to segregate waste water streams and to treat them separately, depending on their characteristics	CC	The operator responded stating that they are compliant with this BAT requirement. Waste water streams are segregated into IBA leachate and runoff, clean uncontaminated surface water run-off and contaminated surface water run-off. More accurately as explained above the surface water ultimately flows into a foul sewer and is an indirect discharge from site. Water can be reused on site in dust suppression systems.
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	CC	The operator responded stating that they are compliant with the requirements of this BAT conclusion. They have stated that (a) is being utilised as the treatment process is optimised to maximise metal recovery and settlement pits are used to settle out suspended solids before discharge of run-off. The BAT AEL's for indirect discharges have been added to the permit and the operator will be monitoring for relevant parameters.
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 operations are using an appropriate combination of the measures listed in the table of BAT 36 including: a, b, d and e . Technique f is not used. The site does not have the capability to wash the 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 techniques a, b, c, d and e are all utilised to reduce noise. There have been no issues with noise reported by the area officer and a Noise Management Plan is in place for the site.
Reg. 61 Request for Further Information (RFI)	Assessment of response received	

<p>Confirm the number of discharges from site</p>	<p>A response was provided stating “We have one “contaminated” discharge to the foul sewer to which the Trade Effluent Consent applies and has “C8 Sampling Point” marked. Then we have two connections to surface water drains (to the combined sewer), these have “C1 Sampling Point” and “C5 Sampling Point” marked on them.” The number of discharges was confirmed and these emission points have been added to the permit with the appropriate limits.</p> <p>Further information was provided by the area officer which clarified that the two surface water drains ultimately flow into the foul sewer and to the treatment works.</p>
<p>What is your operating moisture range – i.e. 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)?</p>	<p>The operator provided the below detail with regards to a moisture range within the IBA and IBAA on site:</p> <p>Delivery of quenched ash: 18-20%</p> <p>Matured ash ready for processing: 10-16%</p> <p>IBAA stockpiles: 12-16%</p> <p>Moisture contents have been confirmed and incorporated within the assessment of dust management techniques.</p>
<p>Do you experience ‘moisture gradient’ during your treatment and storage operations at your site?</p>	<p>The operator responded detailing that moisture gradient is experienced through the process but that this aids the recovery of metals. Moisture is added back into the IBAA when it is discharged through misting halos to prevent dust issues.</p> <p>This explanation has been considered as part of the determination and the assessment of the dust risk. No improvement conditions have been included.</p>
<p>What stages of your treatment and storage operations do you consider to be the highest risk points of dust emissions and what control measures do you have in place to mitigate the risk of dust emissions at those stages?</p>	<p>The operator responded detailing the below processes as the highest risk:</p> <ul style="list-style-type: none"> • Breaking into matured windrows to load into feed hopper. • Screening, conveying and separation. • Vehicle movements across the yard causing resuspension of dust. <p>Mitigation measures were also given such as the building, misting sprays, feed hopper within the building, covered conveyors, treatment plant in enclosed buildings, dampening of roads and speed limits.</p> <p>This explanation has been considered as part of the determination and the assessment of the dust risk. No improvement conditions have been included.</p>
<p>Provide written confirmation from a competent engineer that the site surface and sealed drainage has been constructed to CIRIA 736 or an equivalent approved standard.</p>	<p>The operator provided two further drawings from an engineer. They have stated “<i>This design complies with CIRIA c736 as confirmed by our internal Engineering Department.</i>”</p> <p>This has been accepted.</p>
<p>Has the concrete upstand been extended to prevent rainwater runoff in storm conditions?</p>	<p>Confirmation has been provided with photos that this has been completed.</p>

<p>Have improvements to the alarm systems for the dust monitors been carried out?</p>	<p>Confirmation has been provided with photos that this has been completed.</p>
<p>Confirm what materials are being blended with Processed IBA/IBAA</p>	<p>IBAA is blended with natural aggregates, granite or limestone and Quality Protocol compliant aggregates. A Directly Associated Activity (DAA) has been included within the permit table S1.1 to enable this blending activity.</p>
<p>Provide: An update on the status of the extraction system and whether this is in use or has been removed upon installation of the wet scrubber. A site plan which clearly identifies where the emission point for the extraction system is located, if still installed, and where the emission point for the wet scrubber is located.</p>	<p>A wet scrubber has been installed on the dust extraction system fitted to the IBA feed hopper. This system does have a channelled emission which is vented through a fan and fan stack and the emission point is now listed in the permit.</p>