

## Permitting Decisions - Environment Agency Initiated Variation

---

We have issued an Environment Agency initiated variation for Castle Bromwich IBA Facility operated by Blue Phoenix 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/DB3335RV/V006.

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 13/07/2023.

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:

- *“BPL QMS Storage and Handling of IBA-IBAA”*
- *“BPL EMS P005 Waste Acceptance Criteria”*

- *“BPUK Castle Bromwich 220220 BATC Return Spreadsheet”*
- *“CB Site plan including stockpile plan.”*
- *“Drainage Plan Drawing no12433-005Z”*

### **Changes to the permit conditions**

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

- Conditions 2.4.1 and 2.4.2 have been added to implement the improvement programmes associated with this variation.
- Condition 3.1.2 has been added to specify that the limits in Table S3.1 shall not be exceeded.
- Conditions 3.5.1 – 3.5.4 of this variation have been added to implement the monitoring requirements introduced by this variation.
- Condition 3.6.1 and 3.6.2 related to Pest Management have been added as there are issues with birds at the site.
- Condition 4.3.7 deleted because it is not relevant to the site operation
- 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 as referenced in Condition 2.4.1 has been added to implement the improvement conditions IC1a – IC5.
- Table S3.1 as referenced in Conditions 3.1.1 (a) and 3.6.1 has been amended for monitoring of source emission to sewer.
- Table S3.2 as referenced in Conditions 3.6.1 (b) and 3.6.4 has been added for monitoring of process parameters ambient air.
- Table S3.3 as referenced in Conditions 3.6.1 (b) and 3.6.4 has been added for monitoring of 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   |
|---|-------------------|--|
| <p><b>General management appropriate measures and brief non-technical description of the regulated facility</b></p> | <p>CC</p>         | <p>The operator confirmed that they are compliant with BAT 1 and the site operates ISO 14001 and ISO 9001 management systems that are externally audited annually to maintain standards.</p> <p>The site activities include:</p> <ul style="list-style-type: none"> <li>▪ 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.</li> <li>▪ Storage of waste prior to treatment.</li> <li>▪ Storage of recovered IBAA and residual waste after treatment.</li> <li>▪ Storage of raw materials.</li> <li>▪ Blending of IBAA fractions with virgin/primary.</li> <li>▪ Collection of uncontaminated roof and surface water in a lagoon for reuse at site or discharge to surface water.</li> <li>▪ Collection and storage of contaminated water in a lagoon for re-use on site or discharge to foul sewer.</li> </ul> <p>The site is located in an area occupied by a number of industrial businesses. The Industrial complex is also near a number of designated habitats, notably the Langley Wood Ancient Woodland.</p> <p>Predominantly treatment is inside a processing building but aspects of the treatment and storage are outside. There are no channelled emissions to air but there is a discharge to foul sewer which has a trade effluent discharge consent from Severn Trent Water.</p> <p>The site is equipped with an impermeable surface and a sealed drainage system. Waste water flows to two lagoons where the water is temporarily stored. The water is used for dust suppression or discharged to foul sewer if excessive rainfall results in exceedance of the capacity. The operator is required to monitor the emission to sewer against the parameters and BAT AELS detailed in the permit.</p> |
| <p><b>Waste pre-acceptance, acceptance and tracking appropriate measures</b></p>                                    | <p>CC</p>         | <p>The operator has sent in a waste acceptance procedure and outlined that they follow the voluntary industry protocol to provide reliable classification and assessment of the incinerator bottom ash.</p> <p>The stocks of IBA that are waiting for the classification results are stockpiled in separate batches according to the sample dates and by material source. Batch signs will be posted indicating the stockpile position and ID.</p> <p>The Energy from Waste Facility (EFW) will inform the site when it is going to take the sample from its raw ash. Once a sample is taken by the EFW and the raw ash begins to be delivered to site a new batch will be started and its location and name added to the site ESA Protocol Board. This batch will</p>   |

|   |    |   |
|---|----|---|
|   |    | continue to be stocked in this place until a new sample is taken by the EFW, at this time the incoming IBA will become a new Batch and thus be stored as a separate stockpile.  |
| <b>Waste storage, segregation and handling appropriate measures</b> | FC | <p>The operator has provided a storage and handling procedure “<i>BPL QMS P002 Storage and Handling of IBA-IBAA</i>”.</p> <p>This shows that IBA is stored separately in batches 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 outside for 3 to 6 weeks prior to treatment. IBAA is also stored outside for up to 30 weeks after treatment. The operator confirmed that waste will only be accepted on site if there is sufficient storage capacity. Currently IBA and IBAA stored outside is not protected from prevailing winds on all sides and therefore there is potential for dust generation. There is also screening of IBA that is taking place outside. Given these factors we have added improvement conditions (IC1a &amp; IC1b) to the permit. These improvement conditions require the review of 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.</p> |
| <b>Waste treatment appropriate measures</b>                         | FC | <p>The treatment process involves the receipt of raw unprocessed incinerator bottom ash (IBA). Separation of ferrous and non-ferrous metals from the IBA takes place as well as the production of different fractions of IBAA (coarse IBAA 40mm and fine IBAA 14mm). The operator has stated that blending takes place with virgin aggregates and different fractions. They have further stated that no blending with waste takes place.</p> <p>The operator has identified the emissions and taken measures to control them. They have a processing shed for treatment which contains vibrating screens and magnetic separation. One of the screeners is operated outside.</p> <p>There is an indirect emission to sewer which is monitored by table S3.1. We have also included Improvement Conditions IC1a and IC1b 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 <u>Non-hazardous and inert waste: appropriate measures for permitted facilities</u> guidance and BAT 24 of the <u>Waste Incineration BAT Conclusions</u>.</p>   |
| <b>Emissions control appropriate measures</b>                       | FC | The operator has indicated there are no channelled emissions to air. The site does have a Severn Trent discharge consent for a discharge to sewer. The runoff from site flows to two lagoons where it is temporarily stored so that it can be used in dust suppression. In cases where the lagoon capacity is   |



|  |    |  |
|--|----|--|
|  |    | <p>exceeded there will be a discharge to sewer. Collection and storage of uncontaminated roof and site surface water is collected in tanks</p> <p>BAT AELs and monitoring frequencies have been put in place in the permit for the discharge to sewer. The area officer has indicated that there are no issues with fugitive emissions at the site. However, the reg 61 response has stated that the storage area does not have protection on all sides from prevailing winds and that a screening activity is taking place outside.</p> <p>We have included Improvement Conditions IC1a, IC1b 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 <u>Non-hazardous and inert waste: appropriate measures for permitted facilities</u> guidance and BAT 24 of the <u>Waste Incineration BAT Conclusions</u>.</p> <p>The Reg 61 response also highlighted that the operator needs to add integrity testing of their impermeable surface to meet BAT. There is also no confirmation that the site surfacing meets standards laid out in CIRIA 736</p> <p>We have included Improvement Condition IC2a and IC2b for the operator to undertake a review of the site surfacing and drainage to ensure they are in line with or equivalent to the standards required in CIRIA Report C736.</p> |
| <b>Emissions monitoring and limits appropriate measures</b>                | FC | <p>The operator has indicated there are no channelled emissions to air. The site does have a Severn Trent discharge consent for a discharge to sewer. The runoff from site flows to two lagoons where it is temporarily stored so that it can be used in dust suppression. In cases where the lagoon capacity is exceeded there will be a discharge to sewer. Collection and storage of uncontaminated roof and site surface water is collected in tanks</p> <p>The operator has told us that they did not discharge to sewer for several years as all the water has been used on site but as it can discharge to sewer the relevant parameters, BAT AELs and monitoring frequencies have been put in place in the permit.</p> <p>The area officer has no concerns regarding fugitive emissions of dust. However, the new EA IBA permitting template will require ambient air monitoring and moisture content monitoring. We have added IC 4 to ensure that the operator identifies the ambient air monitoring points on a site map.</p>   |
| <b>Raw Material, Process efficiency and Water Use appropriate measures</b> | CC | <p>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.</p>   |

**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 evidenced that the site operates with ISO 14001 and ISO 9001 management systems that are externally audited.  |
| BAT 3 - monitoring of specified process parameters   | CC                | The operator currently has a foul sewer discharge consent. All relevant parameters to monitor this discharge are listed in table S3.1.   |
| 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                                      | FC                | <p>The operator currently has a foul sewer discharge consent. All relevant parameters to monitor this discharge are listed in table S3.2.</p> <p>The relevant monitoring parameters have been included within the permit.</p>  |
| BAT 10 - quality output management system part of EMS where bottom ash treatment is carried out  | CC                | The operator has stated 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                | <p>The operator stated that measures in line with BAT 12 will be in place by 03/12/2023. They have stated that currently there are no integrity checks in place for the condition of the site surfacing. The operator has not provided any evidence that the impermeable surface is designed to meet the standards outlined in the CIRIA 736 report.</p> <p>Based on this, we have included Improvement Conditions IC2a &amp; IC2b.</p> <p>The operator shall undertake a review of the site surfacing and drainage systems for all areas where waste storage and treatment is taking place. The review shall ascertain the state, design and construction standard of impermeable surfaces and sealed drainage systems on site to confirm that they are in line with, or equivalent to the standards required in CIRIA Report C736. If improvements are identified these will then be implemented,</p> <p>The report of the review shall be certified by a suitably qualified engineer and submitted to the Environment Agency for approval together with details of any improvements.</p> <p>We have also asked the operator to clearly state their capacity to store waste at anyone point in time through IC5. The requirement to add a storage limit at anyone time is a requirement of BAT 12.</p> |
| BAT 23 - in order to prevent or reduce diffuse dust emissions to air from the  | FC                | The operator has stated that their EMS includes the features listed under BAT 23 to identify, reduce and monitor diffuse dust emissions.   |

|   |           |  |
|---|-----------|--|
| <p>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>Based on the information the operator has given, treatment takes place predominantly inside a processing shed and water sprayers are used to keep the waste moist. However, for waste stored outside there is not stockpile protection on all sides of the site, the conveyors cannot be varied in height and there is screening of IBA taking place outside of the process building.</p> <p>We have included Improvement Conditions IC1a and IC1b</p> <p>The operator shall 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.</p> <p>This review shall include but not limited to an assessment of:</p> <ul style="list-style-type: none"> <li>• The screening activities taking place outside.</li> <li>• Stockpile protection.</li> <li>• Discharge height of conveyors</li> </ul> <p>Following the review, the operator shall submit a written report to the Environment Agency for approval outlining the results of the review and measures and procedures that are in place to prevent fugitive emissions of dust.</p> <p>The report shall include recommendations for improvements and installation of new infrastructure, including timescales for implementation of the identified improvements.</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>FC</p> | <p>The operator confirmed that measures listed under sub-section <b>a, d and e</b> of BAT 24 table are in use at the site. They have also stated in their RFI response that the measures listed under sub-section <b>f</b> of BAT 24 table are not in use. The operator stated that measure <b>f</b> is not in use because the IBA is delivered with a moisture content of around 20%. Further to this whilst IBA is onsite it is monitored for dust following their dust management plan. The operator further stated sub atmospheric conditions are generally required for sites that have potential issues with dust and odour. Finally stating they have a Dust Management Plan in place to prevent any fugitive emissions and the material does have a faint earthy smell, but this has never been raised as an issue.</p> <p>The operator stated that <b>b and c</b> of the BAT 24 table are not in use. As stated above we have included IC1a and IC1b detailed above, for the operator to review existing waste treatment, storage and handling measures.</p>  |
| <p>BAT 26 - use a bag filter if treating air from treatment of IBA under sub-atmospheric conditions.</p>  | <p>NA</p> | <p>The operator stated that this BAT is not applicable because IBA is not being treated under sub-atmospheric conditions at the site.</p>  |

|   |  |   |
|---|--|---|
| 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   | FC   | The operator collects clean uncontaminated roof water in tanks for reuse or discharge to sewer. Contaminated runoff is collected in the site lagoons for reuse or discharge to sewer.   |
| 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 stated that there are no direct or indirect emissions to water from bottom ash treatment. However, we interpret treatment of bottom ash to include the storage and handling of IBA and IBAA and not just the actual treatment taking place in the processing shed.<br>The site currently has an indirect discharge consent from Severn Trent. We have included a requirement to monitor the emission to sewer in table S3.1. |
| 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: <b>a,b,c, d</b> and <b>e</b> . The operator indicated that they are currently not using technique <b>f</b> . 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 <b>a, b, c, d</b> and <b>e</b> are all utilised to reduce noise. There have been no issues with noise reported by the area officer.  |
| <b>Reg. 61 Request for Further Information (RFI)</b>  | <b>Assessment of response received</b>   |   |
| Provide information on the parameters and the frequency of monitoring for your emission to water in accordance  | The operator has provided external laboratory results representative of their discharge to sewer. This is currently monitored in compliance with their Severn Trent discharge consent permit. The relevant BAT parameters and emission limits have now been applied to the permit. Lead (Pb) is the only parameter that applies a limit. The lab |   |

|   |   |
|---|---|
| with BAT 6 of the Waste Incineration BAT conclusions.   | results provided by the operator show no exceedance of this parameter, but in accordance with the permit this will be required to be monitored going forward.   |
| Provide a site layout plan that shows the locations of the drainage infrastructure and routes, including information on your discharge points   | The operator has told us that there are two lagoons at the site. The operator has provided a "Site Drainage Plan" showing the discharge point to sewer at the site.   |
| Confirm that the design of your impermeable surface, sealed drainage and any bunding arrangements at the site are suitable and in line CIRIA 736 and that you have measures in place to ensure integrity checks are carried out on the impermeable surfaces as required under BAT 12. | The operator stated in their Reg 61 response that there was no written confirmation that they were CIRIA compliant. In the request for further information they stated that they could get a consultant to write a report to confirm the bunding arrangements at the site are suitable and in line CIRIA 736. Given this we have added an Improvement condition IC2a and IC2b to the permit.  |
| Provide reason(s) why you are not treating and storing the waste within an enclosed building and/or enclosed equipment.   | <p>The operator has confirmed that the treatment is carried out in a 4-sided building. They have also provided a document referenced "Assessment of Benefits and Risk for storing material outside". However, as screening of IBA is taking place externally and storage of IBA is taking place outside without protection from prevailing winds on all sides there is still a requirement to review and implement appropriate measures. We have added IC1a below to the permit to address this.</p> <p>The operator shall 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</p> <p>This review shall include but not be limited to an assessment of:</p> <ul style="list-style-type: none"> <li>• The screening activities taking place outside.</li> <li>• Stockpile protection.</li> <li>• Discharge height of conveyors.</li> </ul> <p>Following the review, the operator shall submit a written report to the Environment Agency for approval outlining the results of the review and measures and procedures that are in place to prevent fugitive emissions of dust.</p> |

|   |   |
|---|---|
|   | The report shall include recommendations for improvements and installation of new infrastructure, including timescales for implementation of the identified improvements  |
| Provide reason(s) why you think that you don't need to contain your treatment under sub atmospheric conditions.   | The operator responded stating sub atmospheric conditions are generally required for sites that have potential issues with dust and odour. They have said that they have a Dust Management Plan in place to prevent any fugitive emissions and the material does have a faint earthy smell, but this has never been raised as an issue. They also have highlighted that the IBA is received with a moisture content of around 20% and is monitored for moisture content.  |
| Provide clear information on the moisture content of the waste from the point of receipt to the treatment and storage of the resultant IBAA. Advise us on whether you have or intend to install a dust extraction unit within your treatment system | The operator has said that there are no plans to install a dust extraction treatment system as the last process of the EfW is to quench the IBA. It is then loaded onto lorries and delivered to site, typically around 20% moisture content. While the IBA is onsite, its monitored following their dust management plan. If required, the dust suppression system dampens down the site and the material stockpiles. We have incorporated an IC3 which will identify an optimum moisture content on site with the aim of controlling dust but also allowing treatment of the IBA without clogging up machinery. |
| Provide any further details of sampling and testing data regarding your discharges to controlled waters   | The EA discharge consent has been rescinded. The operator has provided external laboratory results for their discharge to sewer This is currently monitored in compliance with their Severn Trent discharge consent permit. Limits apply to Lead (Pb) on the EA installations permit. The results provided by the operator show no exceedance of this parameter, but in accordance with the permit this will be required to be monitored going forward.   |