

## Permitting Decisions - Environment Agency Initiated Variation

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We have issued an Environment Agency initiated variation for Murphy's Wharf 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/DP3490EU/V008.

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 13/04/2023. 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 and can be imported and stored at the blending site as a non-waste, in this instance Murphys Warf 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.

**Regulation 61 Response**

The Regulation 61 notice response from the operator was received on 11/07/2023.

We considered that the Regulation 61 notice response did not contain sufficient details for us to commence the determination of the permit review and we needed further information to complete the permit review assessment.

These responses are available on our public register.

The documents submitted by the operator which now form part of the operating techniques that the operator must implement are specified in table S1.2 in the environmental permit. These include:

Documents titled:

- *BATC Return Spreadsheet Greenwich 11.07.2023*
- Points 4.a, 4.c., 6.a. and 13 of *“Greenwich Reg 61 Response Appropriate Measures”*
- *“Method Statement Processing of IBA (Greenwich)”*
- *“IBA Acceptance Quarantine and Production Recording”*
- Response to questions 1, 2, 3, 4, 5, 8, 9 of *“Reg 61 Further Information Greenwich DP3490EU”*
- Email dated 09/12/24: Response to question 4, response to point (a)

Drawings:

- *“GR001-23 Rev 3 Greenwich Waste Storage Plan”*
- *“GR001-33 Rev 3 Site Drainage Plan”*

**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 1.2.1, 1.3.1, 2.1.2, 4.2.2, 4.3.1 and 4.3.3	Wording amended to update references to activities.
Condition 2.3.7	Condition removed, no hazardous waste is authorised for acceptance under the permit.

Conditions 2.4	Conditions added as improvement conditions are included within the permit.
Condition 3.6.1	Wording updated to include reference tables S3.2 and S3.3 for emissions.
Condition 3.6.4	Wording updated to include reference tables S3.2.
Table S1.1 as referenced in condition 2.1.1	Activities table updated in-line with modern standards and current site activities. Activity AR11 added for waste transfer.
Table S1.2 as referenced in condition 2.3.1	Operating techniques updated with documents received in response to the regulation 61 review.
Table S1.3 as referenced in condition 2.4	Reference updated to S1.3 new improvement conditions added.
Table S1.4 as referenced in condition 2.4	Improvement conditions have been added to the permit to ensure compliance with BAT and Appropriate Measures.
Table S2.3 and S2.4 as referenced if condition 2.3.4	List of waste tables updated to reflect site activities.
Table S2.6 as referenced in condition 2.3.4	Table has been added alongside the waste transfer activity AR11.
Table S3.1 as referenced in condition 3.6.1 (a) and 3.6.4	Emissions to sewer updated in-line with BAT.
Table S3.2 as referenced in condition 3.6.1 (a)	Process monitoring added in line with modern template.
Table S3.3 as referenced in condition 3.6.1 (a)	Ambient air monitoring added in line with modern template.
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 S4.4 as referenced in conditions 4.2.2 (c) and 4.2.3 (b)	Table has been amended to include relevant forms.
Schedule 5 as referenced in conditions 4.3.2 and 4.3.4	Updated to modern template formatting.
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><b>General management appropriate measures and brief non-technical description of the regulated facility</b></p>	<p>CC</p>	<p>The operator confirmed that the company is certified to ISO 14001 and ISO 9001, and that 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"> <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 and after treatment.</li> <li>▪ Process water collection and storage for re-use on site or discharge</li> <li>▪ Raw material storage</li> <li>▪ Blending of IBAA with non-waste materials</li> <li>▪ Glass Recycling</li> <li>▪ Construction and demolition waste recycling and reclamation</li> <li>▪ Production of hydraulically bound materials</li> <li>▪ Temporary storage and transfer of glass waste</li> <li>▪ Temporary storage and transfer of metal waste</li> </ul> <p>The facility is located at Murphy’s Wharf, Greenwich. The centre of the Installation is approximately at National Grid Reference TQ 40626 78945. The nearest residential housing is at Horn Link Way, approximately 275 metres west from the boundary of the installation. Other residential housing off Anchor and Hope Lane is within 370 metres, east of the boundary. Retail areas are within 100m of the site boundary to the south and southeast. Other industrial sites boarder the site boundary. The site borders the River Thames and Gilberts Pit (SSSI) is approximately 1.1km to the southeast of the site boundary. The site is located within Air Quality Management Area (AQMA) for PM10 (particulate matter under 10 micrometres in diameter) and for Nitrogen Dioxide (NO2).</p> <p>The treatment process involves removal of ferrous and non-ferrous metals through the use of vibrating screens, over-band magnets, trommeling, eddy current separation and manual picking. These processes separate out metal fractions and produce IBA fractions. Material is transported via enclosed conveyors. Processing of IBA takes place in enclosed buildings. There are discharges to foul sewer.</p> <p>The treatment and storage areas are made up of both an impermeable surface with a sealed drainage system and areas of hardstanding. Inert wastes are permitted to be stored on hardstanding. 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><b>Waste pre-acceptance, acceptance and tracking appropriate measures</b></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 or external bay 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 operations only accept wastes which are listed in the permit. Notwithstanding the specification of permitted waste types, wastes which consist solely of, or mainly of dusts, powders, liquids, sludges or loose fibres are not to be accepted at the depot.</p>
<p><b>Waste storage, segregation and handling appropriate measures</b></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. Storage capacity is defined within the permit.</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>Construction and demolition waste is stored on site in a storage bay on hard standing. The maximum capacity of the C&amp;D storage bay is 20,000 tonnes and the permitted height of this storage is 7m. Inert wastes are permitted to be stored on hard standing but any other waste types must be stored on impermeable surfaces. Inert C&amp;D wastes are also stored on the jetty with a maximum storage capacity of 3,000 tonnes and a maximum height of 4m.</p> <p>Glass wastes are stored on site on impermeable surface to a maximum capacity of 4,500 tonnes and a maximum permitted height of 7m.</p>
<p><b>Waste treatment appropriate measures</b></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 are discharges of contaminated and uncontaminated waters to foul sewer.</p> <p>C&amp;D waste is treated via crushing, magnetic separation, and screening. This produces aggregates and soils. Improvement conditions have been added to ensure that the crushing activity is in line with the appropriate measures and not causing a dust issue. The IC first requires monitoring of ambient dust levels to identify if there is an issue. The operator must then submit a report summarising the results and identifying any measures which need to be taken.</p> <p>Glass waste is brought in to site for transfer. Glass is transferred by sheeted lorries onto the jetty from where contracted vessels are filled via a barge loading depot.</p>
<b>Emissions control appropriate measures</b>	CC	<p>There are no direct emissions to air.</p> <p>The site does have indirect discharges to foul sewer. Waters are generated from the storage areas where processed wastes are stored outside as well as IBA, C&amp;D waste and the waste glass. This water is channelled to settlement areas before discharge to sewer. Water can be reused on site in dust suppression systems.</p> <p>The operator provided analysis of the discharges and has stated Emissions are sufficiently stable based on historic monitoring data and will be monitored at reduced frequency. 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>
<b>Emissions monitoring and limits appropriate measures</b>	CC	<p>There are no direct emissions to air.</p> <p>The site does have indirect discharges to foul sewer. Water runoff is generated from the storage areas where processed wastes are stored outside which includes IBA, C&amp;D waste and the waste glass. This water is channelled to settlement areas before discharge to sewer. Water can be reused on site in dust suppression systems.</p> <p>The operator provided analysis of the discharges and has stated emissions are sufficiently stable based on historic monitoring data and will be monitored at reduced frequency. 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>

<b>Raw Material, Process efficiency and Water Use appropriate measures</b>	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.
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**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>
BAT 1 - EMS	CC	The operator confirmed that the company is certified to ISO 14001 and ISO 9001 and the site operates a management system within this with site specific elements.
BAT 3 - monitoring of specified process parameters	CC	The operator responded indicating that this BAT was not applicable as <i>“As surface water runoff is monitored and controlled by BAT6 and BAT 34 we do not consider BAT3 to be relevant.”</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.  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.
BAT 6 - monitor emissions to water from FGC and/or bottom ash treatment with at least the frequency given below and in accordance with EN standards	CC	The operator responded stating that monitoring was being carried out in line with BAT and that the emissions have been shown to be stable so propose the reduced monitoring frequency.  The relevant monitoring parameters have been included within the permit.
BAT 10 - quality output management system part of EMS where bottom ash treatment is carried out	CC	The operator indicated that a quality management system is in place at the site. The site operates ISO 14001 and ISO 9001 and all IBAA products are tested to ensure they meet relevant highways specifications.
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	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 requested in an RFI to confirm that IBAA was being stored on an impermeable surface.  The operator provided the following response <i>“IBAA stored in area 2 (see GR001-23-Rev3) is partially on hardstanding and partially on the concrete road. IBAA blended products are stored in area 3b which is sealed concrete with contained drainage.”</i>

		The permit already includes limits on storing IBAA on impermeable surface therefore the area compliance team have been made aware of this response. No improvement conditions have been included. The operator however is undergoing a series of improvement works to replace and install new concrete surfaces on site and ensuring IBAA is stored on an impermeable surface.
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	CC	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 preventing emissions of dust. Based on the information the operator has given; treatment takes place in an enclosed system and storage is within the IBA reception building or externally within a bay with dust suppression. IBAA is stored in bays outside which protects against prevailing winds with dust suppression also available.
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	CC	The operator confirmed that measures listed under sub-section <b>a, c, d and e</b> 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. The operator stated that point <b>b</b> of 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 in terms of height as they feed over the top of the walls. A dust suppression system operates on the bay walls to maintain the correct level of moisture within the material.
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. Water can be reused on site in dust suppression systems. Any water not being reused in the dust suppression system is ultimately discharged to foul sewer.
BAT 34 - in order to reduce emissions to water from FGC and/or from the	CC	The operator responded stating that they are compliant with the requirements of this BAT conclusion. They have stated that <b>(a)</b> is being utilised as the treatment process is optimised to

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		<p>maximise metal recovery and settlement pits are used to settle out suspended solids before discharge of run-off.</p> <p>The BAT AEL's for indirect discharges have been added to the permit and the operator will be monitoring against the relevant parameters.</p>
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: <b>a</b> , <b>b</b> , <b>d</b> and <b>e</b> . Technique <b>f</b> 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 <b>b</b> , <b>c</b> , <b>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>		
Confirm the number of discharges from site.	There are two connections to the combined sewer through which all discharges from clean and contaminated areas flow. Detail was provided about these emissions and where they originate on site. Emission points, monitoring and parameters in line with BAT have been added to the permit.	
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>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>	
Are moisture checks being conducted upon IBA stockpiles?	Visual checks are carried out on incoming IBA. Further visual checks are then carried out on IBA stockpiles when they are being broken into or processed. Visual checks of the moisture content of IBAA are carried out daily during the loading of lorries for transport. Oven dried samples are taken as part of the product testing.	

<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"> <li>• Breaking into matured windrows to load into feed hopper.</li> <li>• Screening, conveying and separation.</li> <li>• Vehicle movements across the yard causing resuspension of dust.</li> </ul> <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. External IBA storage is managed through the use of bays fitted with dust suppression. 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 the following response "<i>This design complies with CIRIA c736 as confirmed by our internal Engineering Department. If third party verification is required, we do not have this and will have to seek it.</i>" This has been accepted.</p>
<p>Is IBAA being stored on hardstanding?</p>	<p>The operator provided the following response "<i>IBAA stored in area 2 (see GR001-23-Rev3) is partially on hardstanding and partially on the concrete road. IBAA blended products are stored in area 3b which is sealed concrete with contained drainage.</i>"</p> <p>The permit already includes limits on storing IBAA on impermeable surface therefore the area compliance team have been made aware of this response. No improvement conditions have been included. The operator however is undergoing a series of improvement works to replace and install new concrete surfaces on site and ensuring IBAA is stored on an impermeable surface.</p>
<p>If accepted, where are non-inert wastes stored which are processed under the waste operation.</p>	<p>The operator provided the following response "<i>We do not accept metals or wood. We accept mixtures of soil and stones (EWC 170504). Soil and stones consisting of mostly soil are only accepted by pre-arranged contracts where we have viewed site investigation reports and soil testing results to establish non-hazardous status. This is stored on the jetty on hardstanding.</i>"</p> <p>Waste codes have been reviewed and the appropriate restrictions are in place within the permit. If the operator wishes to accept and store waste which is not inert they will need to do this on an impermeable surface.</p>
<p>Is IBAA being blended under any currently permitted site operations?</p>	<p>The operator provided the following response "<i>IBAA is blended with recycled aggregates under AR6. We weren't aware until these permit reviews that blending with natural aggregates is a Directly Associated Activity to A1 but accept it should be listed as such.</i>"</p>

	A DAA for the blending of IBAA with aggregates has been added to the permit.
Is the glass processing operation to be removed from the permit?	The operator provided the following response " <i>No, we are looking into setting up a new glass treatment process and have request pre-app advice to confirm whether a permit variation will be required but we wish to keep this activity.</i> " The activity has been retained within the permit.