

Notice of variation and consolidation with introductory note

The Environmental Permitting (England & Wales) Regulations 2016

Day Group Limited
Brentford Aggregate Materials Recycling Facility
Transport Avenue
Brentford
Middlesex
TW8 9HF

Variation application number

EPR/BB3232RX/V005

Permit number

EPR/BB3232RX

Brentford Aggregate Materials Recycling Facility

Permit number EPR/BB3232RX

Introductory note

This introductory note does not form a part of the notice.

Under the Environmental Permitting (England & Wales) Regulations 2016 (schedule 5, part 1, paragraph 19) a variation may comprise a consolidated permit reflecting the variations and a notice specifying the variations included in that consolidated permit.

Schedule 1 of the notice specifies the conditions that have been varied and schedule 2 comprises a consolidated permit which reflects the variations being made. Only the variations specified in schedule 1 are subject to a right of appeal.

Changes introduced by this variation notice:

This variation has been issued to update the permit following a statutory review of the permits in the industry sector for treatment of incinerator bottom ash.

The Industrial Emissions Directive (IED) came into force on 7th January 2014 with the requirement to implement all relevant Best Available Techniques (BAT) conclusions as described in the Commission Implementing Decision. The BAT conclusions for incineration were published on 03 December 2019 in the Official Journal of the European Union (L323) following a European Union wide review of BAT, implementing decision 2017/2117/EU of 21 November 2017.

The main features of the permit are as follows.

The environmental permit allows the operation of an Incinerator Bottom Ash recovery facility as well as a waste operation. The waste operation is an aggregate recycling operation which handles various waste streams to produce high quality recycled aggregates. The installation activity accepts and treats Incinerator Bottom Ash (IBA) to recover ferrous and non-ferrous metal and to produce an Incinerator Bottom Ash Aggregate (IBAA). The facility is permitted to accept up to 255,000 tonnes of IBA per year.

Site activities are as follows:

- 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 IBA prior to treatment.
- Storage of wastes recovered from the IBA treatment processes.
- Process water collection and storage for re-use on site or discharge to surface water and/or sewer.
- Blending of IBAA with non-waste materials.
- Construction and demolition waste recycling and reclamation.

Incinerator Bottom Ash Treatment

The IBA is received and stored at the site until the Energy from Waste (EFW) operators provide confirmation to demonstrate that the IBA is non-hazardous in nature. IBA is tipped and stored in windrows up to 8m high by hydraulic excavator in a three-sided building to enable maturation to occur. It is processed after the sample result is received from the producer to confirm that it is non-hazardous. This typically takes up to 2 - 4 weeks. Unprocessed IBA is also delivered to site via rail and unloaded by excavator and placed on the ground, hardstanding, adjacent to the rail discharge area. The IBA received by rail is transferred to the processing plant without being stored or matured within the building. The installation is authorised to process up to 1,100 tonnes of Incinerator Bottom Ash (IBA) per day.

The treatment process involves removal of ferrous and non-ferrous metals through the use of vibrating screens, over-band magnets, trommel, eddy current separators and manual picking. These processes separate out metal fractions and produce IBAA fractions. The IBAA fractions are blended with virgin

materials and non-wastes to produce aggregates which meets the relevant standard for the end-use. The treatment and storage areas have an impermeable surface and sealed drainage system.

Treatment of IBA takes place in enclosed buildings and transfer between buildings is via enclosed conveyors. All screens, magnets and eddy current separators are housed in enclosed buildings and doors are kept closed unless in use. IBAA is stored in external bays.

Dust suppression is used on IBAA stockpiles to limit dust emissions. To further reduce fugitive emissions, dust suppression sprays are used on site. A road sweeper is used daily to ensure the roadways are clean and dust generated within high traffic areas is minimised. To prevent/minimise dust emissions, the incoming waste is received and stored at a moisture content of 18-20%. Moisture content of the IBA is monitored and the site management can take actions to ensure the IBA stays moist and does not cause dust emissions. Moisture content can fluctuate throughout the treatment process and typically IBAA stockpiles have a resulting moisture content of 10-16%. The moisture content of the IBAA is also monitored and additional water added if necessary to prevent dust release.

Waste waters generated within the IBA waste storage and treatment areas are contaminated and subject to a trade effluent consent and discharged to sewer via underground pipework. Waste waters generated within Construction and demolition (C&D) waste treatment and storage areas are discharged to surface water.

Waste operations

C&D waste is processed into recovered aggregates and soils. Waste material is processed through a series of crushers, screens, magnets and picking stations. The primary feed and jaw crusher for this process is located outside while the processing units are located inside a building. The C&D waste is conveyed from the crusher to the building for processing. Metals and wastes recovered from the C&D recycling operation are stored outside in bays or skips. The waste operation is authorised to process 500,000 tonnes of C&D waste per year and up to 2,000 tonnes of C&D waste per day.

The facility is located at Transport Avenue, Brentford. The centre of the facility is approximately at National Grid Reference TQ1631978221. The nearest residential housing at Boston Gardens, approximately 400m northeast of the facilities. The site is located within Air Quality Management Area (AQMA) for Nitrogen Dioxide (NO₂) and has common boundaries with other industrial sites. Syon Park SSSI is approximately 1.6km to the southeast of the site boundary.

The operator has an internal integrated Environmental Management System.

The status log of a permit sets out the permitting history, including any changes to the permit reference number.

Status log of the permit		
Description	Date	Comments
Application received EPR/BB3232RX/A001	Duly made 19/04/12	Application for material recycling facility (WML103193)
Additional information received	09/05/12	Amendment to operating techniques document to include maintenance of site interceptors – Section 4.1.2
Permit determined	31/05/12	Permit issued to Day Group Limited.
Application EPR/BB3232RX/V002	Duly made 19/09/14	Application to vary and update the permit to IED conditions. (variation and consolidation)
Variation determined (Billing ref: HP3132WR)	09/10/15	Varied and consolidated permit issued in modern condition format.
Application EPR/BB3232RX/V003	Duly made 07/02/17	Application to vary a permit Schedule.
Variation determined (Billing ref: YP3635YX and EAWML 103193)	24/04/17	Notice of Variation issued to Day Group Limited.

Status log of the permit		
Description	Date	Comments
Application EPR/BB3232RX/V004	Duly made 18/10/17	Application to increase annual throughput and storage capacity.
Response to Schedule 5 notice dated 06/12/17	12/12/17	Additional information including confirmation of how the operator will accommodate additional waste, confirmation that additional wastes will not impact the drainage system and details of dust mitigation.
2 nd Schedule 5 notice dated 22/12/17	22/12/17	Response no longer required
Variation determined (Billing ref: KP3133JF and EAWML 103193)	15/03/18	Varied permit issued.
Environment Agency Non-hazardous Waste Sector Review Variation Number EPR/ BB3232RX/V005 (variation and consolidation)	11/07/23	Regulation 61 Notice requiring information for Statutory review of the permit against Waste Incineration BAT Conclusions published 12 December 2019 - documents received in response to the Regulation 61 Notice dated 13/04/23.
Regulation 61 notice – additional information request	16/12/24	Documents received in response to the additional information request: <i>“Reg 61 Further Information Brentford BB3232RX”</i> <i>“List of Wastes Table”</i> <i>“BE008-15 Rev0 Air Quality Assessment Arrangement Zones”</i> <i>“BE008-04 Rev3 General Arrangement”</i> <i>“BE008-02 Rev3 Drainage Layout”</i>
Variation issued EPR/ BB3232RX	17/02/25	Varied and consolidated permit issued in modern format

End of introductory note

Notice of variation and consolidation

The Environmental Permitting (England and Wales) Regulations 2010

The Environment Agency in exercise of its powers under regulation 20 of the Environmental Permitting (England and Wales) Regulations 2010 varies and consolidates

Permit number

EPR/BB3232RX

Issued to

Day Group Limited (“the operator”)

whose registered office is

**Day Group House
Transport Avenue
Brentford
Middlesex
TW8 9HF**

company registration number **00432417**

to operate regulated facilities at

**Brentford Aggregate Materials Recycling Facility
Transport Avenue
Brentford
Middlesex
TW8 9HF**

to the extent set out in the schedules.

The notice shall take effect from 17/02/2025

Name	Date
Peter Maksymiw	17/02/2025

Authorised on behalf of the Environment Agency

Schedule 1

The following conditions and tables have been added/varied/deleted as a result of the Environment Agency Initiated Variation:

Conditions	Amendment
Conditions 1.2.1, 1.3.1, 2.1.2 and 4.2.2	Activity references in the conditions have been updated.
Condition 2.3.4 (a)	Reference to table S2.4 removed as this waste table has been removed from the permit.
Conditions 2.4.1 and 2.4.2	Improvement programme condition have been added to implement the improvement conditions in Table S1.3.
Conditions 3.1.1 and 3.5.1	Table references in the conditions have been updated.
Condition 3.5.3	This condition has been added because it is a relevant condition for emissions monitoring. The follow-on condition has been renumbered.
Table S1.1 as referenced in condition 2.1.1	Activities table updated in-line with modern standards and current site activities. Activity for glass recycling has been removed.
Table S1.2 as referenced in condition 2.3.1	Operating techniques updated with documents received in response to the regulation 61 notice and request for additional information. Outdated documents have also been removed.
Table S1.3 as referenced in condition 2.4	This table has been added to implement the Improvement conditions IC1 – IC3.
Table S2.2 and S2.3 as referenced in condition 2.3.4	List of waste tables updated to reflect site activities and remove agreed waste codes. Table S2.4 of the previous variation has been removed because the glass recycling activity is no longer required.
Table S3.1 as referenced in conditions 3.5.1 (a) and 3.5.4	Emission point to air from the dust extraction unit added. The follow-on tables have been renumbered.
Table S3.2 as referenced in conditions 3.5.1 (a) and 3.5.4	Emissions to surface water updated in-line with BAT.
Table S3.3 as referenced in conditions 3.5.1 (a) and 3.5.4	Emissions to sewer updated in-line with BAT.
Table S3.4 as referenced in condition 3.5.1 (a)	Process monitoring added in line with modern template.
Table S3.5 as referenced in condition 3.5.1 (a)	Ambient air monitoring added in line with the modern template.
Table S4.1 as referenced in conditions 4.2.3 (a) and (b)	Reporting parameters updated.

Table S4.2 as referenced in condition 4.2.2	Production and treatment reporting updated.
Table S4.4 as referenced in conditions 4.2.2 (c) and 4.2.3 (b)	Reporting forms updated.
Schedule 5	Updated to match modern template.
Schedule 6	Interpretations updated

Schedule 2 – consolidated permit

Consolidated permit issued as a separate document.

Permit

The Environmental Permitting (England and Wales) Regulations 2010

Permit number

EPR/BB3232RX

This is the consolidated permit referred to in the variation and consolidation notice for application EPR/BB3232RX/V005 authorising,

Day Group Limited (“the operator”),

whose registered office is

**Day Group House
Transport Avenue
Brentford
Middlesex
TW8 9HF**

company registration number **00432417**

to operate an installation and waste operations at

**Brentford Aggregate Materials Recycling Facility
Transport Avenue
Brentford
Middlesex
TW8 9HF**

to the extent authorised by and subject to the conditions of this permit.

Name	Date
Peter Maksymiw	17/02/2025

Authorised on behalf of the Environment Agency

Conditions

1 Management

1.1 General management

- 1.1.1 The operator shall manage and operate the activities:
- (a) in accordance with a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances, closure and those drawn to the attention of the operator as a result of complaints; and
 - (b) using sufficient competent persons and resources.
- 1.1.2 Records demonstrating compliance with condition 1.1.1 shall be maintained.
- 1.1.3 Any person having duties that are or may be affected by the matters set out in this permit shall have convenient access to a copy of it kept at or near the place where those duties are carried out.
- 1.1.4 The operator shall comply with the requirements of an approved competence scheme.

1.2 Energy efficiency

- 1.2.1 For the following activities referenced in Schedule 1, table S1.1 (AR1 to AR5), the operator shall:
- (a) take appropriate measures to ensure that energy is used efficiently in the activities;
 - (b) review and record at least every four years whether there are suitable opportunities to improve the energy efficiency of the activities; and
 - (c) take any further appropriate measures identified by a review.

1.3 Efficient use of raw materials

- 1.3.1 For the following activities referenced in Schedule 1, table S1.1 (AR1 to AR5), the operator shall:
- (a) take appropriate measures to ensure that raw materials and water are used efficiently in the activities;
 - (b) maintain records of raw materials and water used in the activities;
 - (c) review and record at least every four years whether there are suitable alternative materials that could reduce environmental impact or opportunities to improve the efficiency of raw material and water use; and
 - (d) take any further appropriate measures identified by a review.

1.4 Avoidance, recovery and disposal of wastes produced by the activities

- 1.4.1 The operator shall take appropriate measures to ensure that:
- (a) the waste hierarchy referred to in Article 4 of the Waste Framework Directive is applied to the generation of waste by the activities; and
 - (b) any waste generated by the activities is treated in accordance with the waste hierarchy referred to in Article 4 of the Waste Framework Directive; and
 - (c) where disposal is necessary, this is undertaken in a manner which minimises its impact on the environment.

- 1.4.2 The operator shall review and record at least every four years whether changes to those measures should be made and take any further appropriate measures identified by a review.

2 Operations

2.1 Permitted activities

- 2.1.1 The operator is only authorised to carry out the activities specified in schedule 1 table S1.1 (the “activities”).
- 2.1.2 For the following activities referenced in Schedule 1, table S1.1 (AR1 to AR5), waste authorised by this permit shall be clearly distinguished from any other waste on the site.

2.2 The site

- 2.2.1 The activities shall not extend beyond the site, being the land shown edged in green on the site plan at schedule 7 to this permit.

2.3 Operating techniques

- 2.3.1 The activities shall, subject to the conditions of this permit, be operated using the techniques and in the manner described in the documentation specified in schedule 1, table S1.2, unless otherwise agreed in writing by the Environment Agency.
- 2.3.2 If notified by the Environment Agency that the activities are giving rise to pollution, the operator shall submit to the Environment Agency for approval within the period specified, a revision of any plan or other documentation (“plan”) specified in schedule 1, table S1.2 or otherwise required under this permit which identifies and minimises the risks of pollution relevant to that plan, and shall implement the approved revised plan in place of the original from the date of approval, unless otherwise agreed in writing by the Environment Agency.
- 2.3.3 Any raw materials or fuels listed in schedule 2 table S2.1 shall conform to the specifications set out in that table.
- 2.3.4 Waste shall only be accepted if:
- (a) it is of a type and quantity listed in schedule 2 tables S2.2 and S2.3; and
 - (b) it conforms to the description in the documentation supplied by the producer and holder.
- 2.3.5 The operator shall ensure that where waste produced by the activities is sent to a relevant waste operation, that operation is provided with the following information, prior to the receipt of the waste:
- (a) the nature of the process producing the waste;
 - (b) the composition of the waste;
 - (c) the handling requirements of the waste;
 - (d) the hazardous property associated with the waste, if applicable; and
 - (e) the waste code of the waste.
- 2.3.6 The operator shall ensure that where waste produced by the activities is sent to a landfill site, it meets the waste acceptance criteria for that landfill.

2.4 Improvement programme

- 2.4.1 The operator shall complete the improvements specified in schedule 1 table S1.3 by the date specified in that table unless otherwise agreed in writing by the Environment Agency.

- 2.4.2 Except in the case of an improvement which consists only of a submission to the Environment Agency, the operator shall notify the Environment Agency within 14 days of completion of each improvement.

3 Emissions and monitoring

3.1 Emissions to water, air or land

- 3.1.1 There shall be no point source emissions to water, air or land except from the sources and emission points listed in schedule 3 tables S3.1, S3.2 and S3.3.
- 3.1.2 The limits given in schedule 3 shall not be exceeded.
- 3.1.3 Periodic monitoring shall be carried out at least once every 5 years for groundwater and 10 years for soil, unless such monitoring is based on a systematic appraisal of the risk of contamination.

3.2 Emissions of substances not controlled by emission limits

- 3.2.1 Emissions of substances not controlled by emission limits (excluding odour) shall not cause pollution. The operator shall not be taken to have breached this condition if appropriate measures, including, but not limited to, those specified in any approved emissions management plan, have been taken to prevent or where that is not practicable, to minimise, those emissions.
- 3.2.2 The operator shall:
- (a) if notified by the Environment Agency that the activities are giving rise to pollution, submit to the Environment Agency for approval within the period specified, an emissions management plan which identifies and minimises the risks of pollution from emissions of substances not controlled by emission limits;
 - (b) implement the approved emissions management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.
- 3.2.3 All liquids in containers, whose emission to water or land could cause pollution, shall be provided with secondary containment, unless the operator has used other appropriate measures to prevent or where that is not practicable, to minimise, leakage and spillage from the primary container.

3.3 Odour

- 3.3.1 Emissions from the activities shall be free from odour at levels likely to cause pollution outside the site, as perceived by an authorised officer of the Environment Agency, unless the operator has used appropriate measures, including, but not limited to, those specified in any approved odour management plan, to prevent or where that is not practicable to minimise the odour.
- 3.3.2 The operator shall:
- (a) if notified by the Environment Agency that the activities are giving rise to pollution outside the site due to odour, submit to the Environment Agency for approval within the period specified, an odour management plan which identifies and minimises the risks of pollution from odour;
 - (b) implement the approved odour management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.

3.4 Noise and vibration

- 3.4.1 Emissions from the activities shall be free from noise and vibration at levels likely to cause pollution outside the site, as perceived by an authorised officer of the Environment Agency, unless the operator has used appropriate measures, including, but not limited to, those specified in any

approved noise and vibration management plan to prevent or where that is not practicable to minimise the noise and vibration.

3.4.2 The operator shall:

- (a) if notified by the Environment Agency that the activities are giving rise to pollution outside the site due to noise and vibration, submit to the Environment Agency for approval within the period specified, a noise and vibration management plan which identifies and minimises the risks of pollution from noise and vibration;
- (b) implement the approved noise and vibration management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.

3.5 Monitoring

3.5.1 The operator shall, unless otherwise agreed in writing by the Environment Agency, undertake the monitoring specified in the following tables in schedule 3 to this permit:

- (a) point source emissions specified in tables S3.1, S3.2 and S3.3.
- (b) process monitoring specified in table S3.4.
- (c) ambient air monitoring specified in table S3.5.

3.5.2 The operator shall maintain records of all monitoring required by this permit including records of the taking and analysis of samples, instrument measurements (periodic and continual), calibrations, examinations, tests and surveys and any assessment or evaluation made on the basis of such data.

3.5.3 Monitoring equipment, techniques, personnel and organisations employed for the emissions monitoring programme and the environmental or other monitoring specified in condition 3.5.1 shall have either MCERTS certification or MCERTS accreditation (as appropriate), where available, unless otherwise agreed in writing by the Environment Agency.

3.5.4 Permanent means of access shall be provided to enable sampling/monitoring to be carried out in relation to the emission points specified in schedule 3 tables S3.1, S3.2 and S3.3 unless otherwise agreed in writing by the Environment Agency.

4 Information

4.1 Records

4.1.1 All records required to be made by this permit shall:

- (a) be legible;
- (b) be made as soon as reasonably practicable;
- (c) if amended, be amended in such a way that the original and any subsequent amendments remain legible, or are capable of retrieval; and
- (d) be retained, unless otherwise agreed in writing by the Environment Agency, for at least 6 years from the date when the records were made, or in the case of the following records until permit surrender:
 - (i) off-site environmental effects; and
 - (ii) matters which affect the condition of the land and groundwater.

4.1.2 The operator shall keep on site all records, plans and the management system required to be maintained by this permit, unless otherwise agreed in writing by the Environment Agency.

4.2 Reporting

- 4.2.1 The operator shall send all reports and notifications required by the permit to the Environment Agency using the contact details supplied in writing by the Environment Agency.
- 4.2.2 For the following activities referenced in Schedule 1, table S1.1 (AR1 to AR5), a report or reports on the performance of the activities over the previous year shall be submitted to the Environment Agency by 31 January (or other date agreed in writing by the Environment Agency) each year. The report(s) shall include as a minimum:
- (a) a review of the results of the monitoring and assessment carried out in accordance with the permit including an interpretive review of that data;
 - (b) the annual production/treatment data set out in schedule 4 table S4.2; and
 - (c) the performance parameters set out in schedule 4 table S4.3 using the forms specified in table S4.4 of that schedule.
- 4.2.3 Within 28 days of the end of the reporting period the operator shall, unless otherwise agreed in writing by the Environment Agency, submit reports of the monitoring and assessment carried out in accordance with the conditions of this permit, as follows:
- (a) in respect of the parameters and emission points specified in schedule 4 table S4.1;
 - (b) for the reporting periods specified in schedule 4 table S4.1 and using the forms specified in schedule 4 table S4.4; and
 - (c) giving the information from such results and assessments as may be required by the forms specified in those tables.
- 4.2.4 The operator shall, unless notice under this condition has been served within the preceding four years, submit to the Environment Agency, within six months of receipt of a written notice, a report assessing whether there are other appropriate measures that could be taken to prevent, or where that is not practicable, to minimise pollution.
- 4.2.5 Within 1 month of the end of each quarter, the operator shall submit to the Environment Agency using the form made available for the purpose, the information specified on the form relating to the site and the waste accepted and removed from it during the previous quarter.

4.3 Notifications

- 4.3.1 In the event:
- (a) that the operation of the activities gives rise to an incident or accident which significantly affects or may significantly affect the environment, the operator must immediately—
 - (i) inform the Environment Agency,
 - (ii) take the measures necessary to limit the environmental consequences of such an incident or accident, and
 - (iii) take the measures necessary to prevent further possible incidents or accidents;
 - (b) of a breach of any permit condition the operator must immediately—
 - (i) inform the Environment Agency, and
 - (ii) take the measures necessary to ensure that compliance is restored within the shortest possible time;
 - (c) of a breach of permit condition which poses an immediate danger to human health or threatens to cause an immediate significant adverse effect on the environment, the operator must immediately suspend the operation of the activities or the relevant part of it until compliance with the permit conditions has been restored.

- 4.3.2 Any information provided under condition 4.3.1 shall be confirmed by sending the information listed in schedule 5 to this permit within the time period specified in that schedule.
- 4.3.3 Where the Environment Agency has requested in writing that it shall be notified when the operator is to undertake monitoring and/or spot sampling, the operator shall inform the Environment Agency when the relevant monitoring and/or spot sampling is to take place. The operator shall provide this information to the Environment Agency at least 14 days before the date the monitoring is to be undertaken.
- 4.3.4 The Environment Agency shall be notified within 14 days of the occurrence of the following matters, except where such disclosure is prohibited by Stock Exchange rules:
- Where the operator is a registered company:
- (a) any change in the operator's trading name, registered name or registered office address; and
 - (b) any steps taken with a view to the operator going into administration, entering into a company voluntary arrangement or being wound up.
- Where the operator is a corporate body other than a registered company:
- (c) any change in the operator's name or address; and
 - (d) any steps taken with a view to the dissolution of the operator.
- In any other case:
- (e) the death of any of the named operators (where the operator consists of more than one named individual);
 - (f) any change in the operator's name(s) or address(es); and
 - (g) any steps taken with a view to the operator, or any one of them, going into bankruptcy, entering into a composition or arrangement with creditors, or, in the case of them being in a partnership, dissolving the partnership.
- 4.3.5 Where the operator proposes to make a change in the nature or functioning, or an extension of the activities, which may have consequences for the environment and the change is not otherwise the subject of an application for approval under the Regulations or this permit:
- (a) the Environment Agency shall be notified at least 14 days before making the change; and
 - (b) the notification shall contain a description of the proposed change in operation.
- 4.3.6 The Environment Agency shall be given at least 14 days notice before implementation of any part of the site closure plan.

4.4 Interpretation

- 4.4.1 In this permit the expressions listed in schedule 6 shall have the meaning given in that schedule.
- 4.4.2 In this permit references to reports and notifications mean written reports and notifications, except where reference is made to notification being made "immediately", in which case it may be provided by telephone.

Schedule 1 – Operations

Table S1.1 activities			
Activity reference	Activity listed in Schedule 1 of the EP Regulations	Description of specified activity and WFD Annex I and II operations	Limits of specified activity and waste types
AR1	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 the treatment of slags and ashes.	R4: Recycling/reclamation of metals and metal compounds R5: Recycling/reclamation of other inorganic materials	From receipt of permitted waste IBA through to treatment and recovery of the IBAA. Treatment of IBA in an enclosed building using a combination of trommel, vibrating screens, magnetic separators, eddy current separators and manual picking. Treatment shall take place on an impermeable surface with sealed drainage. The daily treatment capacity is limited to 1,100 tonnes per day. Waste types as specified in Table S2.2.
Directly Associated Activity			
AR2	N/A	Storage of IBA prior to treatment R13: Storage of waste pending the operations numbered R1, R4 and R5 (excluding temporary storage, pending collection, on the site where it is produced)	From receipt of waste to transfer to treatment process. Storage shall take place in a building and on an impermeable surface with sealed drainage system. The maximum quantity of IBA to be stored at any one time prior to treatment is limited to 18,000 tonnes. No waste shall be stored for more than 12 months. There shall be no channelled emissions to air. Waste types as specified in Table S2.2.
AR3	N/A	Storage of wastes recovered from the IBA treatment processes R13: Storage of waste pending the operations numbered R1, R4 and R5 (excluding temporary storage, pending collection, on the site where it is produced)	From recovery of waste to despatch off-site for use. Storage of processed IBAA, ferrous and non-ferrous metals, and residual waste after treatment. The maximum quantity of IBAA, ferrous/non-ferrous metals and other residual waste stored at any one time after treatment is limited to 20,000 tonnes. There shall be no channelled emissions to air. No waste shall be stored for more than 12 months.

Table S1.1 activities			
			Storage shall take place on an impermeable surface with a sealed drainage system.
AR4	N/A	Blending of IBAA fractions with aggregates R5: Recycling/reclamation of other inorganic materials	Treatment consisting of blending of IBAA fractions with aggregates. There shall be no channelled emissions to air. Treatment shall take place on an impermeable surface with sealed drainage.
AR5	N/A	Process water collection and storage Collection and storage of process water comprising site surface water run-off from operational areas in settlement pits.	From the collection of process water comprising site surface water run-off from operational areas to re-use within the facility or discharge offsite to foul sewer or surface water. Discharge to surface water for runoff collected from the waste operation area. Discharge to sewer for runoff collected from the IBA/IBAA storage areas.
Activity reference	Description of activities for waste operations		Limits of activities
AR6 Construction and demolition recycling and reclamation	R13: Storage of waste pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced). R4: Recycling/reclamation of metals and metal compounds. R5: Recycling/reclamation of other inorganic compounds.		Treatment consisting only of sorting, separation, screening, crushing, and blending of waste into different components for recovery. Inert waste shall be stored and treated on hard standing, all other wastes shall be stored and treated on an impermeable surface with a sealed drainage system. The maximum quantity of waste stored at any one time prior to treatment is limited to 20,000 tonnes. No waste shall be stored for more than 12 months. Waste types as specified in Table 2.3.

Table S1.2 Operating techniques		
Description	Parts	Date Received
Response to regulation 61 notice EPR/BB3232RX/V005	Documents titled: "BATC Return Spreadsheet Brentford 11.07.2023" Points 4.a to 13 of "Brentford Reg 61 Response Appropriate Measures" "Method Statement Processing of IBA (Brentford)" "IBA Acceptance Quarantine and Production Recording"	11/07/2023
Response to regulation 61 notice EPR/BB3232RX/V008 - Additional information	Documents titled: Response to Questions 1 - 11 of "Reg 61 Further Information Brentford BB3232RX", list of wastes document and including drawings:	10/01/2025

Table S1.2 Operating techniques		
Description	Parts	Date Received
received in response to the Request for Further Information (RFI) dated 16/12/24	BE008-04 Rev3 General Arrangement BE008-02 Rev3 Drainage Layout BE008-15 Rev0 Air Quality Assessment Arrangement Zones	

Table S1.3 Improvement programme requirements		
Reference	Requirement	Date
IC1	<p>The operator shall submit a revised Dust Management Plan (DMP) to the Environment Agency for approval.</p> <p>The revised plan shall include an assessment of the risk of dust pollution associated with the permitted site including information on monitoring method and locations as required in Table S3.5.</p> <p>The plan shall take into account the appropriate measures for dust control specified in the <u>Non-hazardous and inert waste: appropriate measures for permitted facilities</u> guidance and <u>Control and monitor emissions for your environmental permit</u>.</p> <p>Once the DMP is approved by the Environment Agency, the operator shall carry out site operations in accordance with the approved DMP, and any subsequent revisions agreed in writing by the Environment Agency.</p>	17/05/25
IC2	<p>The operator shall submit to the Environment Agency for approval, a proposal to cover, with impermeable surfacing, sealed drainage and containment systems, all areas where IBA, IBAA and any non-inert wastes are stored and treated, together with timescales for implementation of the identified improvements. The design and layout of the drainage and containment infrastructure shall be in accordance with Non-hazardous and inert waste: appropriate measures for permitted facilities guidance and CIRIA Report C736 or an equivalent approved standard and shall be certified by a suitably qualified engineer.</p>	17/05/25
IC3	<p>Following the completion of IC2, the operator shall implement any improvements identified by the deadlines agreed within the proposal. The operator shall complete all improvement programmes by the deadline specified in this improvement condition, unless otherwise agreed in writing with the Environment Agency.</p>	17/08/26

Schedule 2 – Waste types, raw materials and fuels

Raw materials and fuel description	Specification
--	--

Maximum quantity	Annual throughput shall not exceed 255,000 tonnes.
Exclusions	Wastes having the following characteristics shall not be accepted: <ul style="list-style-type: none"> • Consisting solely or mainly of dusts, powders or loose fibres; • Wastes that are in a form which is either sludge or liquid.
Waste code	Description
19	Wastes from waste management facilities, off-site waste water treatment plants and the preparation of water intended for human consumption and water for industrial use
19 01	wastes from incineration or pyrolysis of waste
19 01 12	bottom ash and slag other than those mentioned in 19 01 11

Maximum quantity	Annual throughput shall not exceed 500,000 tonnes.
Exclusions	Wastes having the following characteristics shall not be accepted: <ul style="list-style-type: none"> • Consisting solely or mainly of dusts, powders or loose fibres; • Wastes that are in a form which is either sludge or liquid.
Waste code	Description
01	Wastes resulting from exploration, mining, quarrying, and physical and chemical treatment of minerals
01 01	wastes from mineral excavation
01 01 02	wastes from mineral non-metalliferous excavation
01 04	wastes from physical and chemical processing of non-metalliferous minerals
01 04 08	waste gravel and crushed rocks other than those mentioned in 01 04 07
01 04 09	waste sand and clays
01 04 13	wastes from stone cutting and sawing other than those mentioned in 01 04 07
10	Wastes from thermal processes
10 12	wastes from manufacture of ceramic goods, bricks, tiles and construction products
10 12 08	waste ceramics, bricks, tiles and construction products (after thermal processing)
10 13	wastes from manufacture of cement, lime and plaster and articles and products made from them
10 13 14	waste concrete and concrete sludge
15	Waste packaging, absorbents, wiping cloths, filter materials and protective clothing not otherwise specified

Table S2.3 Permitted waste types and quantities for construction and demolition recycling and reclamation facility	
Maximum quantity	Annual throughput shall not exceed 500,000 tonnes.
Exclusions	Wastes having the following characteristics shall not be accepted: <ul style="list-style-type: none"> • Consisting solely or mainly of dusts, powders or loose fibres; • Wastes that are in a form which is either sludge or liquid.
Waste code	Description
15 01	packaging (including separately collected municipal packaging waste)
15 01 07	glass packaging
17	Construction and demolition wastes (including excavated soil from contaminated sites)
17 01	concrete, bricks, tiles and ceramics
17 01 01	concrete
17 01 02	bricks
17 01 03	tiles and ceramics
17 01 07	mixtures of concrete, bricks, tiles and ceramics other than those mentioned in 17 01 06
17 02	wood, glass and plastic
17 02 02	glass
17 03	bituminous mixtures, coal tar and tarred products
17 03 02	bituminous mixtures other than those mentioned in 17 03 01
17 05	soil (including excavated soil from contaminated sites), stones and dredging spoil
17 05 04	soil and stones other than those mentioned in 17 05 03
17 05 08	track ballast other than those mentioned in 17 05 07
17 09	other construction and demolition wastes
17 09 04	mixed construction and demolition wastes other than those mentioned in 17 09 01, 17 09 02 and 17 09 03
19	Wastes from waste management facilities, off-site waste water treatment plants and the preparation of water intended for human consumption and water for industrial use
19 01	wastes from incineration or pyrolysis of waste
19 01 19	sands from fluidised beds
19 12	wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified
19 12 05	glass
19 12 09	minerals (for example sand, stones)
19 12 12	other wastes (including mixtures of materials) from mechanical treatment of wastes other than those mentioned in 19 12 11 – Construction and demolition wastes only
19 13	wastes from soil and groundwater remediation
19 13 02	solid wastes from soil remediation other than those mentioned in 19 13 01
20	Municipal wastes (household waste and similar commercial, industrial and institutional wastes) including separately collected fractions
20 01	separately collected fractions (except 15 01)

Table S2.3 Permitted waste types and quantities for construction and demolition recycling and reclamation facility	
Maximum quantity	Annual throughput shall not exceed 500,000 tonnes.
Exclusions	Wastes having the following characteristics shall not be accepted: <ul style="list-style-type: none"> • Consisting solely or mainly of dusts, powders or loose fibres; • Wastes that are in a form which is either sludge or liquid.
Waste code	Description
20 01 02	glass

Schedule 3 – Emissions and monitoring

Emission point ref. & location	Source	Parameter	Limit (including unit)	Reference period	Monitoring frequency	Monitoring standard or method
Filtered air vent from dust extraction stack in plan BE008-04 Rev3	IBA treatment feed hopper extraction system via wet scrubber	Dust	No limit set	-	-	-

Emission point ref. & location	Source	Parameter	Limit (incl. unit)	Reference Period	Monitoring frequency	Monitoring standard or method
Sample point 3 discharging at point 'A' as shown on the drawing number BE008-02, Rev3 - Emission to Grand Union Canal	Surface water run-off which has been discharged through settlement pits and an interceptor	Total organic carbon (TOC)	40 mg/l	Flow proportional composite sample over discharge duration, or spot sample if the discharge is mixed and homogeneous	Monthly or otherwise bi-annually if agreed in writing by the Environment Agency	EN 1484
		Total suspended solids	30 mg/l			EN 872
		Lead	0.06 mg/l			EN ISO 11885, EN ISO 17294-2 or EN ISO 15586
		Ammonium – nitrogen (NH ₄ -N)	30 mg/l			EN ISO 11732 or EN ISO 14911
		Chloride (Cl ⁻)	No Limit set			EN ISO 10304-1 or EN ISO 15682
		Sulphate (SO ₄ ²⁻)	1,000 mg/l			EN ISO 10304-1
		Dioxins/Furans (I-TEQ)	No limit set		Bi-annually	BS ISO 18073

Table S3.3 Point source emissions to sewer, effluent treatment plant or other transfers off-site– emission limits and monitoring requirements

Emission point ref. & location	Source	Parameter	Limit (incl. Unit)	Reference period	Monitoring frequency	Monitoring standard or method
Sample points 1 and 2 as shown on the drawing number BE008-02 Rev3 – emissions to sewer	Surface water run-off which has been discharged through settlement pits	Total organic carbon (TOC)	No Limit set	Flow proportional composite sample over discharge duration, or spot sample if the discharge is mixed and homogeneous	Monthly or otherwise bi-annually if agreed in writing by the Environment Agency	EN 1484
		Total suspended solids	No Limit set			EN 872
		Lead	0.06 mg/l			EN ISO 11885, EN ISO 17294-2 or EN ISO 15586
		Ammonium – nitrogen (NH ₄ -N)	No Limit set			EN ISO 11732 or EN ISO 14911
		Chloride (Cl ⁻)	No Limit set			EN ISO 10304-1 or EN ISO 15682
		Sulphate (SO ₄ ²⁻)	No Limit set			EN ISO 10304-1
		Dioxins/Furans (I-TEQ)	No Limit set		Bi-annually	BS ISO 18073

(1) The BAT-AELs may not apply if the downstream waste water treatment plant is designed and equipped appropriately to abate the pollutants concerned, provided this does not lead to a higher level of pollution in the environment.

Table S3.4 Process monitoring requirements

Emission point reference or source or description of point of measurement	Parameter	Monitoring frequency	Monitoring standard or method	Other specifications
At the IBA and IBAA waste stockpiles shown on the site layout plan BE008-15 Rev0	Moisture content	As agreed under the dust emissions management plan	As agreed under the dust emissions management plan	-
Sample points 1, 2 and 3 as shown on the drawing number BE008-02 Rev3	pH	Flow proportional composite sample over discharge duration, or spot sample if the discharge is mixed	BS ISO 10523	-
	Conductivity		EN 27888	-

Table S3.5 Ambient air monitoring requirements				
Emission point reference or source or description of point of measurement	Parameter	Monitoring frequency	Monitoring standard or method	Other specifications
In accordance with approved dust emissions management plan required under IC1	Deposited dust	Monthly	<u>Monitoring emissions to air, land and water (MCERTS) - GOV.UK</u> (Specific guides for air)	Monitoring methods, trigger levels and actions as specified in approved dust emissions management plan required under IC1
	Visual dust checks	Daily		

Schedule 4 – Reporting

Parameter	Emission or monitoring point/reference	Reporting period	Period begins
Point source emissions to sewer, parameters as required by condition 3.5.1	Sampling points 1 and 2 identified in the drawing number BE008-02 Rev3	Every 12 months	1 January
Point source emissions to water, parameters as required by condition 3.5.1	Sample point 3 discharging at point 'A' identified in the drawing number BE008-02 Rev3	Every 12 months	1 January
Process monitoring (moisture content) parameters as required by condition 3.5.1	At the IBA and IBAA waste stockpiles shown on the site layout plan BE008-15 Rev0	Every 6 months	1 January, 1 July
Process monitoring (ambient air monitoring) parameters as required by condition 3.5.1	In accordance with approved dust emissions management plan required under IC1	Every 6 months	1 January, 1 July
Process monitoring (pH and conductivity) parameters as required by condition 3.5.1	Sampling point 1, 2 and 3 identified in the drawing number BE008-02 Rev3	Every 12 months	1 January

Parameter	Units
Ferrous metals recovered	tonnes
Non-ferrous metals recovered	tonnes
IBA treated	tonnes
IBAA produced	tonnes

Parameter	Frequency of assessment	Units
Water usage	Annually	m ³ per tonne of processed ash
Energy usage	Annually	MWh per processed ash
Raw materials used	Annually	tonnes

Table S4.4 Reporting forms		
Media/parameter	Reporting format	Date of form
Point source emissions to water	Emissions to Water Reporting Form, or other form as agreed in writing by the Environment Agency	Version 1, 08/03/2021
Point source emissions to sewer	Emissions to Sewer Reporting Form, or other form as agreed in writing by the Environment Agency	Version 1, 08/03/2021
Process monitoring	Process Monitoring Form, or other form as agreed in writing by the Environment Agency	Version 1, 08/03/2021
Ambient air monitoring	Ambient Air Monitoring Form, or other form as agreed in writing by the Environment Agency	Version 1, 08/03/2021
Water usage	Form Water Usage 1 or other form as agreed in writing by the Environment Agency	Version 1, 08/03/2021
Energy usage	Form Energy 1 or other form as agreed in writing by the Environment Agency	Version 1, 08/03/2021
Other performance indicators	Form Performance 1 or other form as agreed in writing by the Environment Agency	Version 1, 08/03/2021
Waste returns	E-waste return form	

Schedule 5 – Notification

These pages outline the information that the operator must provide.

Units of measurement used in information supplied under Part A and B requirements shall be appropriate to the circumstances of the emission. Where appropriate, a comparison should be made of actual emissions and authorised emission limits.

If any information is considered commercially confidential, it should be separated from non-confidential information, supplied on a separate sheet and accompanied by an application for commercial confidentiality under the provisions of the EP Regulations.

Part A

Permit Number	
Name of operator	
Location of Facility	
Time and date of the detection	

(a) Notification requirements for any malfunction, breakdown or failure of equipment or techniques, accident, or emission of a substance not controlled by an emission limit which has caused, is causing or may cause significant pollution	
To be notified within 24 hours of detection	
Date and time of the event	
Reference or description of the location of the event	
Description of where any release into the environment took place	
Substances(s) potentially released	
Best estimate of the quantity or rate of release of substances	
Measures taken, or intended to be taken, to stop any emission	
Description of the failure or accident.	

(b) Notification requirements for the breach of a limit	
To be notified within 24 hours of detection unless otherwise specified below	
Emission point reference/ source	
Parameter(s)	
Limit	
Measured value and uncertainty	
Date and time of monitoring	

(b) Notification requirements for the breach of a limit	
To be notified within 24 hours of detection unless otherwise specified below	
Measures taken, or intended to be taken, to stop the emission	

Time periods for notification following detection of a breach of a limit	
Parameter	Notification period

(c) Notification requirements for the breach of permit conditions not related to limits	
To be notified within 24 hours of detection	
Condition breached	
Date, time and duration of breach	
Details of the permit breach i.e. what happened including impacts observed.	
Measures taken, or intended to be taken, to restore permit compliance.	

(d) Notification requirements for the detection of any significant adverse environmental effect	
To be notified within 24 hours of detection	
Description of where the effect on the environment was detected	
Substances(s) detected	
Concentrations of substances detected	
Date of monitoring/sampling	

Part B – to be submitted as soon as practicable

Any more accurate information on the matters for notification under Part A.	
Measures taken, or intended to be taken, to prevent a recurrence of the incident	
Measures taken, or intended to be taken, to rectify, limit or prevent any pollution of the environment which has been or may be caused by the emission	

The dates of any unauthorised emissions from the facility in the preceding 24 months.	
---	--

Name*	
Post	
Signature	
Date	

* authorised to sign on behalf of the operator

Schedule 6 – Interpretation

“accident” means an accident that may result in pollution.

“application” means the application for this permit, together with any additional information supplied by the operator as part of the application and any response to a notice served under Schedule 5 to the EP Regulations.

“authorised officer” means any person authorised by the Environment Agency under section 108(1) of The Environment Act 1995 to exercise, in accordance with the terms of any such authorisation, any power specified in section 108(4) of that Act.

“bottom ash” means ash falling through the grate transported by the grate.

“building” means a construction that has the objective of providing sheltering cover and minimising emissions of noise, particulate matter, odour and litter.

“emissions to land” includes emissions to groundwater.

“EP Regulations” means The Environmental Permitting (England and Wales) Regulations SI 2010 No.675 and words and expressions used in this permit which are also used in the Regulations have the same meanings as in those Regulations.

“emissions of substances not controlled by emission limits” means emissions of substances to air, water or land from the activities, either from the emission points specified in schedule 3 or from other localised or diffuse sources, which are not controlled by an emission limit.

“groundwater” means all water, which is below the surface of the ground in the saturation zone and in direct contact with the ground or subsoil.

148).

“Industrial Emissions Directive” means DIRECTIVE 2010/75/EU OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 24 November 2010 on industrial emissions, as read in accordance with Schedule 1A to the Environmental Permitting (England and Wales) Regulations 2016.

“List of Wastes” means the list of wastes established by Commission Decision 2000/532/EC replacing Decision 94/3/EC establishing a list of wastes pursuant to Article 1(a) of Council Directive 75/442/EEC on waste and Council Decision 94/904/EC establishing a list of hazardous waste pursuant to Article 1(4) of Council Directive 91/689/EEC on hazardous waste.

“MCERTS” means the Environment Agency’s Monitoring Certification Scheme.

“quarter” means a calendar year quarter commencing on 1 January, 1 April, 1 July or 1 October.

“recovery” means any of the operations provided for in Annex II to Directive 2008/98/EC of the European Parliament and of the Council on waste.

“sealed drainage system” in relation to an impermeable surface, means a drainage system with impermeable components which does not leak and which will ensure that:

- no liquids will run off the surface otherwise than via the system.
- all liquids entering the system are collected in a sealed sump, except where liquids may be lawfully discharged to foul sewer.

“separation” means separating wastes into different material types, components and grades.

“sorting” means sorting that may be undertaken by hand or machinery. Sorting enables materials to be processed and recycled appropriately. It may involve separation of different waste types or the separation of different metal types including different ferrous metals, non-ferrous metals and non-metallic materials (e.g. paper and plastic). The sorted metals are graded by visual inspection, supplemented by chemical and other laboratory tests. The physical sorting may be assisted by conveyors and electromagnets.

“Waste code” means the six-digit code referable to a type of waste in accordance with the List of Wastes and in relation to hazardous waste, includes the asterisk.

“Waste Framework Directive” or “WFD” means Waste Framework Directive 2008/98/EC of the European Parliament and of the Council on waste, as read in accordance with Schedule 1A to the Environmental Permitting (England and Wales) Regulations 2016.

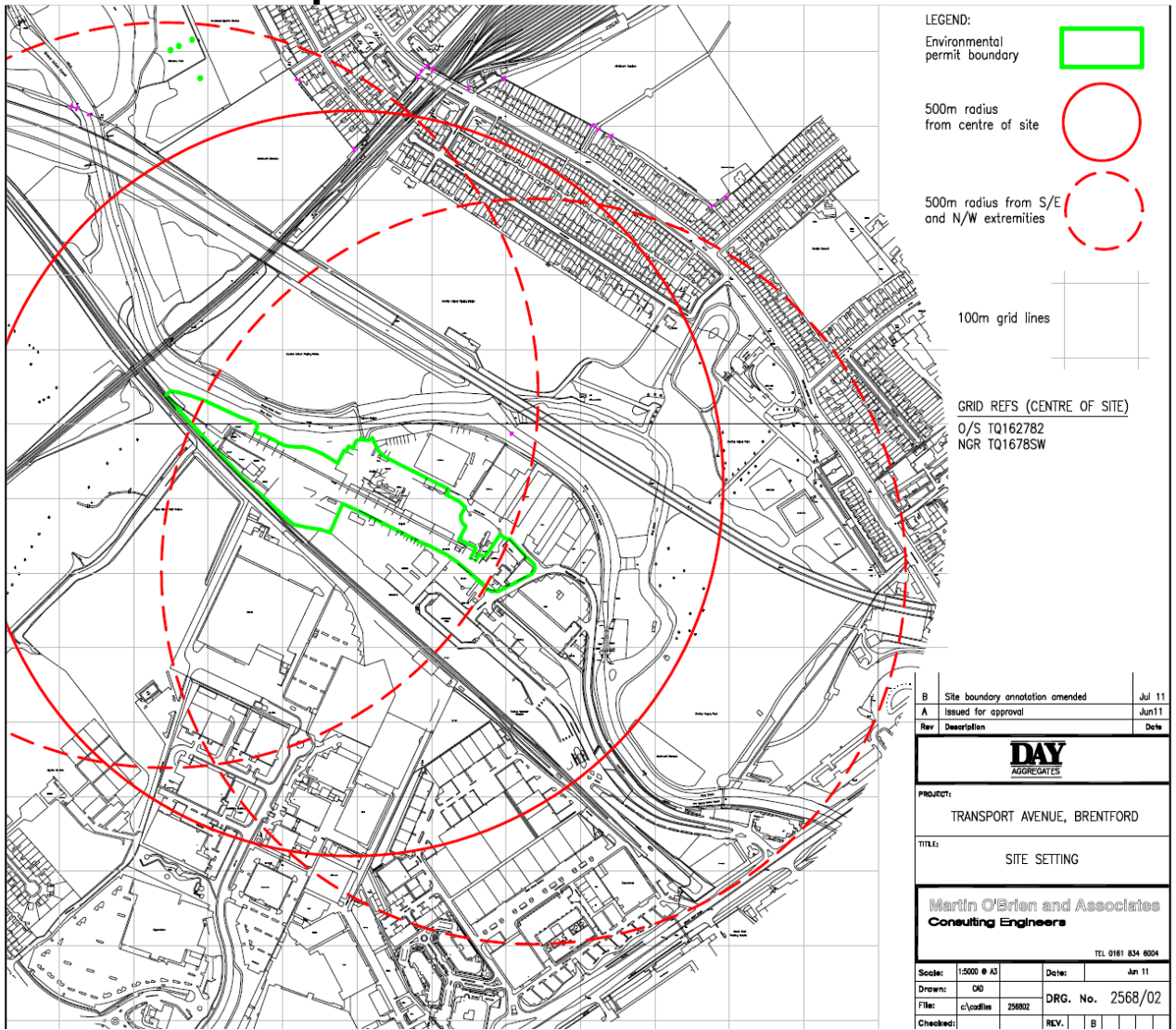
“year” means calendar year ending 31 December.

Where a minimum limit is set for any emission parameter, for example pH, reference to exceeding the limit shall mean that the parameter shall not be less than that limit.

Unless otherwise stated, any references in this permit to concentrations of substances in emissions into air means:

- in relation to emissions from combustion processes, the concentration in dry air at a temperature of 273K, at a pressure of 101.3 kPa and with an oxygen content of 3% dry for liquid and gaseous fuels, 6% dry for solid fuels; and/or
- in relation to emissions from non-combustion sources, the concentration at a temperature of 273K and at a pressure of 101.3 kPa, with no correction for water vapour content.

Schedule 7 – Site plan



END OF PERMIT