

## Permitting Decisions - Environment Agency Initiated Variation

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We have issued an Environment Agency initiated variation for Hill Barton IBA operated by Rock Solid Processing 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/XP3503PF/V003.

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 15/05/2023.

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 V1.5', 'South West Sampling Results' and 'Discharge Consent Hill Barton (17-9-209)'.

- Email containing response to questions 1 - 8 of the RFI, including the documents titled 'HB Drainage Drawing' and 'HB Dust Monitoring\_Results\_Final'.

### **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:

- Condition 2.5.1 of the previous permit variation has been deleted because the pre-operational condition has been completed.
- Condition 3.2.2 has been added because it is a relevant condition which will allow the Environment Agency to request for an amendment to the emissions management plan. The follow-on condition has been renumbered.
- Condition 3.5.1 (b) and (c) have been added to implement the process and ambient air monitoring requirements introduced by this variation.
- Conditions 3.5.3 and 3.5.4 have been added because they are relevant to the monitoring requirements in Condition 3.5.1.
- Conditions 4.2.2 (b) and (c) have been amended to refer to the appropriate tables.
- Condition 4.2.3 has been added because it is a relevant installation condition. The follow-on conditions have been renumbered.
- Table S1.1 as referenced in Condition 2.1.1 has been amended to clearly define the activities that are undertaken at the site, to apply relevant restrictions to them and to add activity AR4.
- Table S1.2 as referenced in Conditions 2.3.1 and 2.3.2 has been added 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 amended to mark the completed improvement conditions (IC1 – IC3) and include the new improvement conditions - IC4, IC5, IC6 and IC7.
- Table S1.4 as referenced in Condition 2.5.1 of the previous permit variation has been deleted because the pre-operational condition has been completed.
- Table S3.1 as referenced in Conditions 3.5.1 (a) and 3.5.4 has been amended to include parameters and limits specified in the Waste Incineration BAT Conclusions emission to sewer.
- Table S3.2 as referenced in Conditions 3.5.1 (b) and 3.5.4 has been added for process monitoring of moisture content, pH and conductivity.

- Table S3.3 as referenced in Conditions 3.5.1 (c) and 3.5.4 has been added for ambient air monitoring of dust emissions.
- Table S4.1 as referenced in Conditions 4.2.3 (a) and (b) has been added to implement reporting requirements for channelled emission, process and ambient air monitoring. The follow-on tables have been renumbered.
- Table S4.4 as referenced in Conditions 4.2.2 (c) and 4.2.3 (b) has been amended to include relevant forms.
- Schedule 5 as referenced in Conditions 4.3.2 and 4.3.4 has been amended by adding a new paragraph (c) to Part A requiring notification of breach of permit conditions not relating to limits.
- 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/deleting 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 site is permitted to accept less than 100,000 tonnes of IBA per year and to undertake the following installation activities:</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>▪ S5.4 A(1) (a) (ii) - Disposal of non-hazardous waste with a capacity exceeding 50 tonnes per day involving physico-chemical treatment.</li> <li>▪ Storage of IBA waste prior to treatment.</li> <li>▪ Storage of wastes recovered from the IBA treatment processes.</li> <li>▪ Collection and treatment of wastewater prior to discharge via sewer, including storage of recovered sludge prior to offsite disposal.</li> <li>▪ Storage of raw materials including fuel and lubrication oils.</li> </ul> <p>Unprocessed IBA when imported into the site is stored outside until a sufficient tonnage has been reached for treatment. During the storage time, the IBA goes through a ‘natural ageing’ process which enables it to form a crust on the surface due to its cementitious properties. The IBA is processed through a series of mechanical sorting mechanisms, including crushing, screens, eddy current and magnetic metal separation to produce different grades of processed incinerator bottom ash aggregate (IBAA) and remove ferrous and non-ferrous metals. This takes place within the site building.</p> <p>All finished IBAA is to be used as aggregate and ferrous and non-ferrous metals are sent for recycling at an appropriate facility. Any unburnt material will be sent back to the facility of origin for further processing.</p> <p>The site has an impermeable surface and a sealed drainage system. All wastewater flows to the on-site leachate treatment plant (LTP) prior to discharge to sewer. Sludge produced from the wastewater treatment plant is pumped straight from the LTP to a tanker for disposal at an appropriate facility.</p>
<p><b>Waste pre-acceptance, acceptance and tracking appropriate measures</b></p>	<p>CC</p>	<p>The operator has waste pre-acceptance, acceptance and rejection procedures.</p> <p>The operator confirm that they are adhering to the test and release protocols set out in the ESA IBA characterisation. IBA is stored pending test results and only released once written confirmation - including test results are provided to demonstrate that the IBA is non-hazardous.</p>

		<p>Analysis of samples is carried out by laboratories who are UKAS or MCERTs accredited for the test methods.</p> <p>IBA is stored separately pending test results and is removed from site if test results demonstrate that IBA is hazardous waste.</p>
<b>Waste storage, segregation and handling appropriate measures</b>	FC	<p>The permitted annual throughput of the facility is limited 100,000 tonnes per year of IBA. The quantity of IBA that is stored at any one time is limited to 35,000 tonnes. Storage of IBAA is limited 5,000 tonnes at any one time while other residual waste is limited to 500 tonnes.</p> <p>The operator has indicated that their maximum storage time for IBA is 4 months and 1 month for IBAA and other residual waste (ferrous and non-ferrous waste). The storage period of IBA, IBAA and other residual waste in the permit is however limited to 12 months allowing flexibility. Wastewater generated at the site is stored/treated in the Leachate Treatment Plant and discharged within 30 days. The sludge may be stored for a maximum of 12 months. All sludge is removed as part of an annual service/ clean of the LTP system.</p> <p>The operator has procedures in their management system for the regular inspection and maintenance of storage areas and associated infrastructure, including site surfacing, drainage systems and containment measures. Signs of damage, deterioration and leakage are recorded along with actions taken once repaired or replaced. Faults must be repaired as soon as practicable.</p> <p>The operator confirmed that all waste storage, processing and handling areas are on an impermeable surface with sealed drainage and sealed construction joints and that the sealed drainage has been constructed to meet CIRIA 736 or an equivalent approved standard.</p> <p>Given the limited information on the current state of the impermeable surface, we have included Improvement Conditions IC5 and IC6 which require the operator to review and ascertain the state of the site areas that are currently covered by an impermeable surface and sealed drainage systems and determine if the design and construction of the impermeable surface and sealed drainage systems are in line with or equivalent to the standards required in CIRIA Report C736.</p>
<b>Waste treatment appropriate measures</b>	CC	<p>Unprocessed IBA received at the site is stored outside until a sufficient tonnage is reached for treatment. The IBA is processed through a series of mechanical sorting mechanisms, including crushing, screens, eddy current and magnetic metal separation to produce different grades of processed incinerator bottom ash aggregate (IBAA) and remove ferrous and non-ferrous metals. Two fractions of IBAA are produced from the treatment operations - 0mm-8mm and &gt;8mm≤8mm.</p> <p>Processing of the IBA takes place within the building and the different fractions produced are kept inside in designated storage bays or skip containers. Larger containers are kept outside for storage of the larger fraction of recovered ferrous material.</p>



		<p>The Leachate Treatment Plant (LTP) is located inside the building and all treatment takes place inside the building apart from the sludge settlement tank which is located just outside the front of the processing building. The tank is fully contained and situated on an impermeable concrete layer.</p> <p>The LTP is designed to treat any contaminated water that has come into contact with IBA before release from site under a discharge consent authorized by the local water authority (South West Water). The LTP is not used in treating any other wastewater or imported leachate or wastewater. The Clarity monitoring system allows authorized user access to a live telemetry system that is also set-up to inform any faults or trigger breach warnings. The LTP uses pH correction, by reducing the pH with CO2 injection and controls. With the addition of a coagulant polymer (ferric chloride), the suspended solids are caused to flocculate and to settle out of suspension by use of gravimetry. Treated water is discharged to foul sewer under discharge consent. The resulting sludge can be stored in sealed tanks which are emptied on an annual basis or after inspection. The waste sludge EWC is generally deemed hazardous after analysis and is emptied by using a vacuum tanker and disposed of at a suitably permitted treatment facility</p>
<b>Emissions control appropriate measures</b>	FC	<p>The operator indicated that there are no channelled emissions to air and that there is a channelled emission to sewer. Fugitive emissions to air are likely due to the nature of the waste.</p> <p>We have included Improvement Condition IC4 which requires the operator to submit a revised Dust Management Plan (DMP) following an assessment of the risk of dust pollution associated with the permitted site operations. The revised plan is expected to include details of the procedure for assessing optimum moisture ranges, including information on a moisture monitoring method and frequency for both the IBA and IBAA</p> <p>The revised DMP shall take into account the appropriate measures for dust control specified in the <u>Non-hazardous and inert waste: appropriate measures for permitted facilities guidance and Control and monitor emissions for your environmental permit.</u></p>
<b>Emissions monitoring and limits appropriate measures</b>	CC	<p>The operator indicated that there are no channelled emissions to air and that there is a channelled emission to sewer. As a result, we have included in the permit, the appropriate emission monitoring or BAT AEL limits for indirect discharge specified in the <u>BAT Conclusions for Waste Incineration.</u></p>
<b>Raw Material, Process efficiency and Water Use appropriate measures</b>	CC	<p>Raw materials such as polymers and coagulants are being used in the wastewater treatment process. 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 confirmed that the site operates an EMS that complies with all points listed in BAT 1.
BAT 3 - monitoring of specified process parameters	CC	The operator stated that process monitoring is carried out in line with BAT 3 requirements for the relevant parameters. The site generated wastewater is being discharged to sewer.
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 stated that monitoring is carried out in line with BAT 6 requirements and that emissions are sufficiently stable based on historic monitoring data and will be monitored at reduced frequency. Within table S3.1 of the permit, monitoring frequency is described as “monthly or otherwise bi-annually if agreed in writing by the Environment Agency”.
BAT 10 - quality output management system part of EMS where bottom ash treatment is carried out	CC	The operator indicated that they have a quality management system in place at the site.
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	Although the operator stated that measures in line with BAT 12 are in place, we have included improvement Conditions IC5 and IC6 require the operator to review and ascertain the state of the site areas that are currently covered by an impermeable surface and sealed drainage systems and determine if the design and construction of the impermeable surface and sealed drainage systems are in line with or equivalent to the standards required in CIRIA Report C736.
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	FC	<p>The operator confirmed that they have an EMS which includes the features listed under BAT 23. To ensure that diffused dust emissions from all site operations are reviewed and considered, we have included Improvement Condition IC4. This requires the operator to submit a revised Dust Management Plan (DMP) following an assessment of the risk of dust pollution associated with the permitted site operations. The revised plan is expected to include details of the procedure for assessing optimum moisture ranges, including information on a moisture monitoring method and frequency for both the IBA and IBAA.</p> <p>The revised DMP shall take into account the appropriate measures for dust control specified in the <u>Non-hazardous and inert waste: appropriate measures for permitted facilities guidance and Control and monitor emissions for your environmental permit.</u></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	FC	<p>The operator confirmed that the following measures listed in the table of BAT 24 are in use at the site:</p> <ul style="list-style-type: none"> <li><b>a)</b> enclosed and covered equipment/building</li> <li><b>b)</b> limit height of discharge,</li> </ul>

<p>combination of the techniques in the corresponding table</p>		<p><b>c)</b> protect stockpiles against prevailing wind,  <b>d)</b> water sprays,  <b>e)</b> optimise moisture content.  The measures outlined in sub-section <b>f)</b> of the BAT 24 table (operate under sub-atmospheric pressure) is not applicable given that the IBA treatment is a wet process.  Based on our knowledge of the site, we have included Improvement Condition IC4 which requires the operator to submit a revised Dust Management Plan (DMP) following an assessment of the risk of dust pollution associated with the permitted site operations. The revised plan is expected to include details of the procedure for assessing optimum moisture ranges, including information on moisture monitoring method and frequency for both the IBA and IBAA  The revised DMP shall take into account the appropriate measures for dust control specified in the <u>Non-hazardous and inert waste: appropriate measures for permitted facilities guidance and Control and monitor emissions for your environmental permit.</u></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.</p>
<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 wastewater streams and to treat them separately, depending on their characteristics</p>	<p>CC</p>	<p>The operator initially indicated that the measures listed under BAT 32 are not in use. However, following a Request for Further Information, the operator confirmed that they have drainage system which keeps collected rainwater from the roof and the gully separate from water that has been in contact with IBA material.</p>
<p>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</p>	<p>NA</p>	<p>Wastewater from the site is captured and treated at the LTP using a combination of equalisation, neutralisation and physical separation.</p>
<p>BAT 36 - in order to increase resource efficiency for the treatment of slags and bottom ashes, BAT is to use an</p>	<p>CC</p>	<p>The following measures listed in the table of BAT 36 are in use at the site: <b>a) screening and sieving, b) crushing, d) mechanical separation e) ageing.</b></p>

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.		The operator stated that they are not using the following techniques at the site: <b>c) aeraulic separation</b> and <b>f) washing</b> .
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 they are using noise attenuation and operational measures/techniques listed in this BAT: a) appropriate location of equipment and buildings, b) operational, c) low-noise equipment and d) noise attenuation measures.
<b>Reg. 61 Request for Further Information (RFI)</b>		
<b>Assessment of response received</b>		
<p>1. Provide a detailed annotated site layout plan(s) that shows:</p> <ul style="list-style-type: none"> <li>▪ the locations of your waste storage and treatment activities, including screeners, crusher, and other plants associated with IBA treatment operations.</li> <li>▪ the extent of the impermeable surface.</li> <li>▪ the locations of emission control measures.</li> <li>▪ the location and direction of flow of your drainage including the emission and monitoring points.</li> <li>▪ the locations dust monitoring points</li> <li>▪ the locations of nearby receptors.</li> </ul>		<p>In the response received on the 13/05/2024, the operator provided a drainage plan instead of a site layout plan. Although the operator stated that '<i>PDF documents of all required plans will be attached to the email accompanying this response document</i>', this was not provided up until the time of issuing this permit. As such we have included an Improvement Condition IC7 which requires the operator to provide an updated site layout plan within two months of issuing this permit variation.</p>
<p>2. Provide information on the operational set-up of your Leachate Treatment Plant (LTP), including information on the EWC code(s) of waste that you are accepting under this activity and your treatment capacity</p>		<p>The operator stated that '<i>the Leachate Treatment Plant (LTP) is designed to treat any contaminated water that has come into contact with IBA before release from site under a discharge consent authorized by the local water authority (South West Water). The LTP is not used to treat any other wastewater, nor is there any treatment of imported leachate or wastewater. The LTP has been designed and installed by Siltbuster Ltd – wastewater treatment specialists. The LTP is owned and operated by Rock Solid Processing Ltd with access to a continual monitoring system</i>'.</p> <p>Further information on the design and operation of the LTP was provided in the response letter; this was considered detailed and sufficient.</p>

<p>3. Provide details of your maximum storage capacities at any one time for the IBA, IBAA and leachate and other waste that you generate at the site and demonstrate that you have enough storage capacity for these wastes</p>	<p>The operator provided the following information on the storage capacities of IBA, IBAA, leachate and other waste:</p> <p><b>IBA maximum storage capacity</b>  <i>It is estimated that the site can store 35,000 tonnes of IBA material in the yard to the rear of the site to a height of 10 metres. However, it has been deemed that approximately 25,000 tonnes is the workable limit to allow for access for tipping and stockpiling and operation of the machinery.</i></p> <p><b>Unburnt/quarantined material storage capacity</b>  <i>The estimation for unburnt or quarantined material is approximately 30 tonnes.</i></p> <p><b>IBAA maximum storage capacity</b>  <i>The estimated storage capacity of IBAA is approximately 5,000 tonnes.</i></p> <p><b>Ferrous Material maximum storage capacity</b>  <i>Ferrous Material is stored in 2x 40yrd containers 1x Articulated lorry sized container.</i></p> <p><b>Non- Ferrous Material maximum storage capacity</b>  <i>The estimated storage capacity for non- ferrous material is 240 tonnes depending on fraction sizes. NF material is split into different size fractions with each stored in marked bays constructed of concrete Legio blocks.</i></p> <p><b>Wastewater/ Sludge from LTP maximum storage capacity</b>  <i>The maximum storage capacity for the entire leachate treatment plant is 100m3.</i></p>
<p>4. Provide information on the storage period of IBA, IBAA and leachate</p>	<p>The operator provided the following information on the storage duration of IBA, IBAA, leachate and other waste:</p> <p><b>IBA maximum storage period</b>  <i>IBA material is stored for no-longer than 4 months. This figure is likely to be reduced significantly as processing of the IBA will be done on a more permanent basis rather than the current campaign method.</i></p> <p><b>Unburnt/quarantined material storage period</b>  <i>Unburnt/quarantined material is stored no longer than a month. The usual course of action is to send material back to the original EfW plant within 5 days as the transport between the EfW and the Hill Barton IBA processing facility runs several times per day (mon-fri)</i></p> <p><b>IBAA maximum storage period</b>  <i>The maximum storage period for IBAA will be no longer than 1 month. The actual storage duration is much shorter due a dedicated commercial team managing the offtake of IBAA material</i></p> <p><b>Ferrous Material maximum storage period</b></p>

	<p><i>Ferrous material is stored for a maximum of 1 month but usually emptied daily or every other day as the material is accepted by another licensed material recovery facility located locally on the Hill Barton Business Park estate.</i></p> <p><b>Non- Ferrous Material maximum storage period</b></p> <p><i>Non-ferrous material is stored on site for a maximum of 1 month but is usually exported off site daily.</i></p> <p><b>Wastewater/ Sludge from LTP maximum storage period</b></p> <p><i>The maximum storage time of wastewater is difficult to quantify as the volume passing through the system is dependent on rainfall. To is to be expected that from the specification of the LTP that it should take no longer than 30 days for wastewater to pass through the entirety of the drainage/LTP system.</i></p> <p><i>The sludge is stored for a maximum of 12 months. All sludge is removed as part of an annual service/ clean of the LTP system. Checks on the LTP including the volume of sludge are done daily. The system also has a sensor which will alarm if the level becomes too high.</i></p>
<p>5. Confirm if you are undertaking all of your storage and treatment operations inside of an enclosed building and/or enclosed equipment.</p>	<p>The operator confirmed that imported IBA material is stored outside on an impermeable surface; however, the processing of the IBA is undertaken inside the building. The different fractions produced from the IBA treatment process are kept inside the building in designated storage bays or skip containers. Larger containers are kept outside for storage of the larger fraction of recovered ferrous material.</p> <p>The LTP is located inside the building and all treatment takes place inside the building apart from the sludge settlement tank which is located just outside the front of the processing building. The tank is fully contained and situated on an impermeable concrete layer.</p>
<p>6. Outline clearly any activity that you are undertaking outside of an enclosed building/equipment and provide details of the specific dust control measures that you have in place for such activities</p>	<p>The operator provided an outline of the dust control measures that are deployed to mitigate dust pollution for activities that are undertaken outside of the building; however, we included an Improvement Condition, IC4 which requires the operator to submit a revised Dust Management Plan (DMP) following an assessment of the risk of dust pollution associated with the permitted site operations. The revised plan is expected to include details of the procedure for assessing optimum moisture ranges, including information on moisture monitoring method and frequency for both the IBA and IBAA</p> <p>The revised DMP shall take into account the appropriate measures for dust control specified in the <u>Non-hazardous and inert waste: appropriate measures for permitted facilities guidance</u> and <u>Control and monitor emissions for your environmental permit</u>.</p>
<p>7. Provide a summary of all monitoring data for dust releases to air, including any point source releases and from dust deposit monitoring gauge(s) over the last two years.</p>	<p>The operator provided a copy of the dust monitoring report dated 26<sup>th</sup> of May 2023. The report indicates all PM10 concentrations were below the Air Quality Objective (AQO) and that the 24-hour mean was exceeded at both Locations 1 and 3. Concentrations of PM2.5 were low, with Location 3 just above the target value.</p> <p>To ensure that dust emission issues are reviewed and assessed, we included an Improvement Condition, IC4 which requires the operator to submit a revised Dust Management Plan (DMP) following an assessment of the risk of dust pollution associated with the permitted site operations. The revised plan is expected to include</p>

	<p>details of the procedure for assessing optimum moisture ranges, including information on moisture monitoring method and frequency for both the IBA and IBAA</p> <p>The revised DMP 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><b>8.</b> Provide details of systems you have in place for separate capturing and segregation of contaminated and uncontaminated waters at the site.</p>	<p>The operator provided a drainage plan and confirmed that <i>'the drainage system keeps collected rain water from the roof and the gully separated from water that has been in contact with IBA material'</i>.</p>