

Notice of variation and consolidation with introductory note

The Environmental Permitting (England & Wales) Regulations 2016

Blue Phoenix Limited
Ridham IBA Facility
Ridham Dock Industrial Complex
Iwade
Sittingbourne
Kent
ME9 8SR

Variation application number

EPR/BB3837RM/V006

Permit number

EPR/BB3837RM

Ridham IBA Facility

Permit number EPR/BB3837RM

Introductory note

This introductory note does not form a part of the notice

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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. The installation 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 75,000 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 waste prior to treatment.
- Storage of wastes recovered from the IBA treatment processes
- Collection and storage of uncontaminated roof and site surface water
- Collection and storage of contaminated site surface water drainage in a settlement lagoon
- Storage of raw materials.
- Blending of IBAA fractions with virgin/primary aggregate.
- Acceptance, storage and transfer of processed ferrous and non-ferrous metals recovered from IBA recycling from other Blue Phoenix Limited sites

The unprocessed IBA is imported to the site and stored separately on site until the testing data confirms the waste classification of the IBA as non-hazardous. It is stored outside for approximately three weeks, during which time the IBA goes through the maturation process. The IBA is then processed within a building, through the use of vibrating screens and magnetic metal separation which removes the ferrous and non-ferrous metals and produces different sized fractions of Incinerator Bottom Ash Aggregate (IBAA). The IBAA fractions, primary and virgin aggregates are blended to produce an IBAA which meets the relevant standard for the end-use.

All processed IBAA is used as aggregate, ferrous and non-ferrous metals are sent for recycling at an appropriate facility, and any unsuitable material is returned to the source EfW for reprocessing. The treatment and storage areas are impermeable with a sealed drainage system.

The site is equipped with a dust suppression spray bar in the storage yard to quench incoming IBA and mobile and static water cannons to suppress any potential dust emissions. The permit incorporates a dust management plan which details further measures in place for the control of dust.

All surface water flows to a concrete catchpit to remove settled solids and then to a lagoon that's PVC lined and a 100mm concrete slab base. Water from the lagoon can be used again for dust suppression. Any excess lagoon water is tankered off site to an appropriate water treatment facility. There are no point source discharges to controlled waters or foul sewer.

The site is located in the northern side of an industrial estate and sits adjacent to other facilities processing concrete and aggregates. To the west of the industrial estate is marsh land. The Swale channel is approximately 450 metres to the east and also meanders to within 100 metres to North of the site boundary. There are two Sites of Specific Scientific Interest (SSSI's) within 2 kilometres of the facility. There are a number of European habitat sites and wildlife sites within the screening distances of the facility. This includes three Special Protection Areas (SPAs), three Ramsar Sites and one Marine Conservation Zone (MCZ) within 10 kilometres of the installation boundary. There is one National Nature Reserve (NNR), and two Local Wildlife sites (LWS) within 2 kilometres of the Installation boundary.

The nearest residential receptor is a house located at Swallow Avenue approximately 1.1 miles to the west from the facility.

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 EPR/BB3837RM/A001	Duly made 14/10/11	Application for waste IBA recycling facility.
Additional information received	17/01/12	IBA/IBAA stockpile details.
Additional information received	21/02/12	Technically competent management details.
Additional information received	02/03/12	Dust management plan. Site drainage details.
Additional information received	30/04/12	Non-technical summary
Permit determined EPR/BB3837RM	21/06/12	Permit issued to Ballast Phoenix Limited.
Application EPR/BB3837RM/V002 (variation)	Duly made 23/09/13	Change to registered office address.
Variation issued EPR/BB3837RM	08/11/13	Varied permit issued to reflect change of registered address.
Application EPR/BB3837RM/V003 (variation and consolidation)	Duly made 09/09/14	Application to vary and update the permit to IED conditions.
Variation determined EPR/BB3837RM	21/07/16	Varied and consolidated permit issued in modern condition format.
Application EPR/BB3837RM/V004 (variation and consolidation)	Duly made 16/07/19	Variation to extend installation boundary, add storage building, relocate surface water lagoon, and addition of waste operation and 3 waste codes. Company name changed from Ballast Phoenix Limited to Blue Phoenix Limited.
Schedule 5 notice issued	03/10/19	
Schedule 5 response	14/11/19, 15/11/19, 19/12/19 and 15/01/20	The following information was received as part of the Schedule 5 response: Updated Dust and

Status log of the permit		
Description	Date	Comments
		Emissions Management Plan and updated Site Layout Plan.
Variation determined EPR/BB3837RM	20/02/20	Varied permit issued.
Application EPR/BB3837RM/V005 (variation and consolidation)	Duly made 11/04/22	Variation to allow the storage of IBAA externally
Schedule 5 response	10/06/22	Dust and Particulates Emissions Management Plan
Variation determined EPR/BB3837RM/V005 (Installation billing reference: CP3205MT)	22/06/22	Varied permit issued.
Environment Agency Non-hazardous Waste Sector Review Variation number EPR/BB3837RM/V006 (variation and consolidation)	13/04/23	Regulation 61 Notice requiring information for Statutory review of permit. BAT Conclusions published 03 December 2019 - documents received in response to the Regulation 61 Notice dated 13/07/2023.
Variation issued. EPR/DB53335RV	18/03/25	Varied and consolidated permit issued in modern format

End of introductory note

Notice of variation and consolidation

The Environmental Permitting (England and Wales) Regulations 2016

The Environment Agency in exercise of its powers under regulation 20 of the Environmental Permitting (England and Wales) Regulations 2016 varies

Permit number

EPR/BB3837RM

Issued to

Blue Phoenix Limited ("the operator")

whose registered office is

1 Victoria Stables

Essex Way

Bourne

Lincolnshire

PE10 9JZ

company registration number 03290431

to operate a regulated facility at

Ridham IBA Facility

Ridham Dock Industrial Complex

Iwade

Sittingbourne

Kent

ME9 8SR

to the extent set out in the schedules.

The notice shall take effect from 18/03/2025

Name	Date
Peter Maksymiw	18/03/2025

Authorised on behalf of the Environment Agency

Schedule 1

The following conditions were varied as a result of the application made by the operator:

- Conditions 2.4.1 and 2.4.2 have been added to implement the improvement programmes associated with this variation
- Conditions 3.2.2 relating to emissions of substances not controlled by emission limits has been added to update to modern permit conditions
- Conditions 3.6.1 to 3.6.4 related to monitoring, have been added to update to modern permit conditions
- Conditions 3.7.1 to 3.7.2 related to Pests, have been added as they are deemed relevant.
- Table S1.1 as referenced in Condition 2.1.1 has been amended to clearly define the activities that are undertaken at the site and to apply relevant limits to them.
- Table S1.2 as referenced in Conditions 2.3.1 and 2.3.2 has been amended to incorporate operating technique documents submitted in response to the Regulation 61 Notice.
- Table S1.3 as referenced in Condition 2.4.1 has been added to implement the improvement conditions IC1 – IC3b.
- Table S3.1 as referenced in Conditions 3.6.1 (a) and 3.6.4 has been added for process monitoring requirements
- Table S3.2 as referenced in Conditions 3.6.1 (b) has been added for monitoring of ambient air.
- Table S4.2 has been amended to reflect the modern IBA template
- Table S4.4 as referenced in Conditions 4.2.2 (c) and 4.2.3 (b) has been amended to include relevant forms.
- Amendment to schedule Notification Part A in line with the modern permit conditions
- Schedule 6 as referenced in condition 4.4.1 has been amended by adding additional interpretations that are relevant to the changes made as a result of this variation and by updating some of the existing interpretations.

Schedule 2 – consolidated permit

Consolidated permit issued as a separate document.

Permit

The Environmental Permitting (England and Wales) Regulations 2016

Permit number

EPR/BB3837RM

This is the consolidated permit referred to in the variation and consolidation notice for application EPR/BB3837RM/V006 authorising,

Blue Phoenix Limited ("the operator"),

whose registered office is

1 Victoria Stables

Essex Way

Bourne

Lincolnshire

PE10 9JZ

company registration number 032290431

to operate an installation at

Ridham IBA Facility

Ridham Dock Industrial Complex

Iwade

Sittingbourne

Kent

ME9 8SR

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

Name	Date
Peter Maksymiw	18/03/2025

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 AR7) 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 AR7) 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 AR7) 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 yellow 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.
- 3.1.2 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 Fire prevention

- 3.5.1 The operator shall take all appropriate measures to prevent fires on site and minimise the risk of pollution from them including, but not limited to, those specified in any approved fire prevention plan.
- 3.5.2 The operator shall:
 - (a) if notified by the Environment Agency that the activities are giving rise to a risk of fire, submit to the Environment Agency for approval within the period specified, a fire prevention plan which prevents fires and minimises the risk of pollution from fires;
 - (b) implement the fire prevention plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.

3.6 Monitoring

- 3.6.1 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) process monitoring specified in table S3.1 and;
 - (b) ambient air monitoring specified in table S3.2
- 3.6.2 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.
- 3.6.3 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.
- 3.6.4 Permanent means of access shall be provided to enable sampling/monitoring to be carried out in relation to the emission points specified in schedule 2 tables S3.1 and S3.2 unless otherwise agreed in writing by the Environment Agency.

3.7 Pests

- 3.7.1 The activities shall not give rise to the presence of pests which are likely to cause pollution, hazard or annoyance outside the boundary of the site. The operator shall not be taken to have breached this condition if appropriate measures, including, but not limited to, those specified in any approved pests management plan, have been taken to prevent or where that is not practicable, to minimise the presence of pests on the site.
- 3.7.2 The operator shall:
 - (a) if notified by the Environment Agency, submit to the Environment Agency for approval within the period specified, a pests management plan which identifies and minimises risks of pollution, hazard or annoyance from pests;
 - (b) implement the pests management plan, from the date of approval, 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 AR7) 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:

- (a) any change in the operator's name or address; and
- (b) any steps taken with a view to the dissolution of the operator.

In any other case:

- (a) the death of any of the named operators (where the operator consists of more than one named individual);
- (b) any change in the operator's name(s) or address(es); and
- (c) 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.

4.3.7 Where the operator has entered into a climate change agreement with the Government, the Environment Agency shall be notified within one month of:

(a) a decision by the Secretary of State not to re-certify the agreement;

(b) a decision by either the operator or the Secretary of State to terminate the agreement; and

(c) any subsequent decision by the Secretary of State to re-certify such an agreement.

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 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 Treatment of IBA in an enclosed building using a combination of a trommel, vibrating screens, electrostatic and magnetic separators Treatment shall take place on an impermeable surface with sealed drainage. 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 on an impermeable surface with sealed drainage system. The maximum quantity of IBA stored at any one time is limited to 41,000 tonnes. No waste shall be stored for more than 12 months. 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 after treatment. The maximum quantity of IBAA, ferrous/non-ferrous metals stored at any one time is limited to 41,000 tonnes. Storage shall take place on an impermeable surface with a sealed drainage system

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
AR4	N/A	Storage of raw materials	From the receipt of raw materials to despatch for use within the facility.
AR5	N/A	Collection and storage of uncontaminated roof and site surface water in catch pit which flows to a lagoon.	From the collection of uncontaminated roof and site surface water from non-operational areas to re-use within the facility.
AR6	N/A	Collection and storage of contaminated site surface water in a settlement lagoon.	From the collection of contaminated waste water produced at the facility to re-use within the facility or despatch off site for recovery or disposal via tanker
AR7	N/A	Blending of IBAA fractions with virgin/primary aggregates	<p>Treatment consisting of blending of IBAA fractions with virgin/primary aggregates only.</p> <p>There shall be no channelled emissions to air and/or direct discharges to water from this activity.</p> <p>Treatment shall take place on an impermeable surface with sealed drainage.</p>
Activity reference	Description of activities for waste operations		Limits of activities
AR8 Household, commercial and industrial waste transfer station	<p>R4: Recycling/reclamation of metals and metal compounds</p> <p>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)</p>		<p>From receipt and acceptance of waste to despatch off-site for recovery.</p> <p>Acceptance, storage and transfer of processed ferrous and non-ferrous metals recovered from IBA recycling from other Blue Phoenix Limited sites.</p> <p>There shall be no treatment of ferrous and non-ferrous metals recovered</p> <p>Maximum of 126 tonnes per day to be delivered and accepted to site.</p> <p>Storage shall take place on an impermeable surface with sealed drainage</p> <p>Waste types and quantities as specified in Table S2.3 of this permit.</p>

Table S1.2 Operating techniques		
Description	Parts	Date Received
Application EPR/BB3837RM/A001	Part B4, Table 3a Technical Standards	14/10/11
Application (variation) EPR/BB3837RM/V004	Form Parts C2, C3 and C4 of the application documents and all associated supporting information.	Duly Made 16/07/19
Response to Schedule 5 Notice dated 06/05/22.	Updated Dust and Particulate Emissions Management Plan version 5, dated; 10/06/2022 Ridham Dust Control Housekeeping Measures, dated; 10/01/2020	10/06/22
Response to regulation 61 notice EPR/BB3837RM/V006 dated 13/04/2023	Documents titled: <ul style="list-style-type: none"> ▪ “BPUK Ridham 220220 BATC returns Spreadsheet V1.5” ▪ “RD-BPL-UK-017-Process-Flow-A03” ▪ “RD P22006-SMCE-ZZ-XX-DR-C0001 -P01-Permit Site Plan” ▪ ”BPL QMS P002 Storage and Handling of IBA-IBAA ▪ “BPL EMS P005 Waste acceptance Criteria“ 	13/07/23

Table S1.3 Improvement programme requirements		
Reference	Requirement	Date
IC1	<p>The operator shall carry out a detailed review of the existing waste treatment, storage and handling equipment at the site to ensure that they are in accordance with the requirements specified in the <u>Non-hazardous and inert waste: appropriate measures for permitted facilities</u> guidance and BAT 24 of the <u>Waste Incineration BAT Conclusions</u>.</p> <p>This review shall include but not be limited to an assessment of:</p> <ul style="list-style-type: none"> • Stock pile protection from prevailing winds • Blending of IBAA with other aggregates • Discharge height of conveyors. • Of the optimum moisture range. 	21/09/2025
IC2	<p>Following the review required under IC1, the operator shall submit an updated Dust Management Plan to the Environment Agency for approval.</p> <p>The revised plan shall include any recommendation for improvements identified under IC1 including those relating to:</p> <ul style="list-style-type: none"> • Stock pile protection from prevailing winds • Blending of IBAA with other aggregates • Discharge height of conveyors. • the optimum moisture range. <p>The dust management plan shall also provide details of the moisture monitoring method and frequency for the monitoring of IBA and IBAA stockpiles. The monitoring methods may include for example, the use of moisture probes or dry/wet analysis or any other alternative methods that are suitable for establishing the optimum moisture range for effective dust emission control.</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>, which may include but not limited to, installation of new infrastructure together with timescales for implementation of any identified improvements.</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>	21/09/2026
IC3	<p>The operator shall undertake a review of the site surfacing and drainage systems for the waste reception, handling, and storage and treatment areas in line with BAT 12. The review shall ascertain the state, design and construction</p>	21/09/25

	<p>standard of impermeable surfaces and sealed drainage systems on site to confirm that they are in line with, or equivalent to the standards required in CIRIA Report C736.</p> <p>The report of the review shall be certified by a suitably qualified engineer and submitted to the Environment Agency for approval together with details of any improvements</p>	
IC4	<p>Following the completion IC3a, the operator shall implement the improvement measures by the deadline specified in this improvement condition unless otherwise agreed in writing with the Environment Agency. The improvements may include, but are not limited to, the installation of impermeable surface, sealed drainage and containment systems</p>	21/09/26

Schedule 2 – Waste types, raw materials and fuels

Table S2.1 Raw materials and fuels	
Raw materials and fuel description	Specification
Fuel oil	Sulphur content not exceeding 0.1% by mass.

Table S2.2 Permitted waste types and quantities for treatment and storage under AR1 and AR2 Activity – IBA treatment and storage activities.	
Maximum quantity	The total quantity of waste accepted at the site under all activities the IBA treatment and storage activities shall not exceed 75,000 tonnes per year, with the maximum quantity accepted under AR7 being no more than 25,000 tonnes per year.
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
19 12	Wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified
19 12 12	other wastes (including mixtures of materials) from mechanical treatment of wastes other than those mentioned in 19 12 11 – incinerator bottom ash aggregate (IBAA) only

Table S2.3 Permitted waste types and quantities for storage and transfer under AR8 – Household, commercial and industrial waste transfer station (R4, R13) ⁽¹⁾	
Maximum quantity	The total quantity of waste accepted at the site under all activities the IBA treatment and storage activities shall not exceed 75,000 tonnes per year, with the maximum quantity accepted under AR7 being no more than 25,000 tonnes per year.
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 02	Ferrous materials removed from bottom ash
19 12	Wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified
19 12 03	Non-ferrous metal
19 12 12	Other wastes (including mixtures of materials) from mechanical treatment of wastes other than those mentioned in 19 12 11 ⁽²⁾
Notes	
(1) Only processed ferrous and non-ferrous metals recovered from IBA recycling from other Blue Phoenix Limited sites to be accepted.	
(2) Limited to 'non-ferrous metal concentrate' only. As per application documents for variation application EPR/BB3837RM/V004.	

Schedule 3 – Emissions and monitoring

Table S3.1 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 “RD P22006-SCME-ZZ-XX-DR-C-0001-P01-Permit Site Plan”	Moisture content	As agreed under the dust emissions management plan required in the Improvement Condition 1	As agreed under the dust emissions management plan required in the Improvement Condition 1	

Table S3.2 Ambient air monitoring requirements				
Emission point reference or source or description of point of measurement	Parameter	Monitoring frequency	Monitoring standard or method	Other specifications
At the identified dust monitoring locations shown in Figure 5 of the “Dust and Particulate Emission Management Plan”. Dated June 2022	Deposited dust	Monthly	<u>Monitoring emissions to air, land and water (MCERTS) - GOV.UK (Technical Guidance notes for ambient air monitoring).</u>	Monitoring methods, trigger levels and actions as specified in approved dust emissions management plan
	Visual dust checks	Daily		

Schedule 4 – Reporting

Parameters, for which reports shall be made, in accordance with conditions of this permit, are listed below.

Table S4.1 Reporting of monitoring data			
Parameter	Emission or monitoring point/reference	Reporting period	Period begins
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Table S4.2: Annual production/treatment	
Parameter	Units
IBA treated	tonnes
IBAA produced	tonnes
Ferrous metals recovered	tonnes
Non-ferrous metals recovered	tonnes
Ferrous metals imported	tonnes
Non-ferrous metals imported	tonnes

Table S4.3 Performance parameters		
Parameter	Frequency of assessment	Units
Water usage	Annually	tonnes
Energy usage	Annually	MWh
Total raw material used	Annually	tonnes

Table S4.4 Reporting forms		
Media/parameter	Reporting format	Date of form
Process monitoring	Process 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	

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

“disposal”. Means any of the operations provided for in Annex I to Directive 2008/98/EC of the European Parliament and of the Council on waste.

“emissions to land” includes emissions to groundwater.

“EP Regulations” means The Environmental Permitting (England and Wales) Regulations SI 2016 No.1154 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.

“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, as amended from time to time.

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

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.

“year” means calendar year ending 31 December.

Schedule 7 – Site plan



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