

## Permitting Decisions- Bespoke Permit

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We have decided to grant the permit for North Storage Depot operated by Hensel Recycling (UK) LTD.

The permit number is EPR/JP3522SP/A001.

The permit was granted on 04/06/2025

The application is for

The treatment of catalytic converters by detaching the exhaust system using hydraulic shearing. The applied for treatment process also includes the opening of the metal casing and extraction of the ceramic monolith, which contains the precious metal catalyst, along with the metal or RCF matting that provides thermal insulation and physical support to the ceramic monolith.

Ceramic monoliths are accepted with or without RCF matting attached. The RCF matting (considered carcinogen) is manually removed during the shearing and milling process and stored in labelled, sealed rigid containers prior to disposal at a landfill. All employees potentially exposed to this material are properly trained and wear the required respiratory protective equipment (RPE) and/or operate under a LEV system fitted with a HEPA filter.

The operator is currently carrying out this process at a separate site, for which the permit is being surrendered. The purpose of this application is to move the operation to North Storage Depot.

We consider in reaching that 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.

## Purpose of this document

This decision document provides a record of the decision making process. It summarises the decision-making process to show how the main relevant factors have been taken into account.

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- summarises the decision making process in the [decision considerations](#) section to show how the main relevant factors have been taken into account

- shows how we have considered the [consultation responses](#)

Unless the decision document specifies otherwise we have accepted the applicant's proposals.

Read the permitting decisions in conjunction with the environmental permit.

## **Decision considerations**

### **Confidential information**

A claim for commercial or industrial confidentiality has not been made.

The decision was taken in accordance with our guidance on confidentiality.

### **Identifying confidential information**

We have not identified information provided as part of the application that we consider to be confidential.

The decision was taken in accordance with our guidance on confidentiality.

### **Consultation**

The consultation requirements were identified in accordance with the Environmental Permitting (England and Wales) Regulations (2016) and our public participation statement.

We consulted the local authority.

- UK Health Security Agency - Response received.
- Local Authority Environmental Health/Protection Department – Response received but they don't have any comments/concerns.
- Local Authority Planning Department – No response received.
- Health and Safety Executive - No response received.
- Local Fire Service - No response received.
- Natural England - No response received.

- Sewerage Authorities - Response received but they don't have any comments/concerns.
- Food Standards Agency - No response received.

The comments and our responses are summarised in the [consultation responses](#) section.

## **Operator**

We are satisfied that the applicant (now the operator) is the person who will have control over the operation of the facility after the grant of the permit. The decision was taken in accordance with our guidance on legal operator for environmental permits.

## **The regulated facility**

We considered the extent and nature of the facility at the site in accordance with RGN2 'Understanding the meaning of regulated facility', Appendix 2 of RGN2 'Defining the scope of the installation', Appendix 1 of RGN 2 'Interpretation of Schedule 1', guidance on waste recovery plans and permits and Non-hazardous and inert waste: appropriate measures for permitted facilities.

## **The site**

The operator has provided plans which we consider to be satisfactory.

These show the extent of the site of the facility.

The plans show the location of the part of the installation to which this permit applies on that site.

The plan is included in the permit.

## **Site condition report**

The operator has provided a description of the condition of the site, which we consider is not satisfactory. The decision was taken in accordance with our guidance on site condition reports and baseline reporting under the Industrial Emissions Directive.

We have advised the operator what measures they need to take to improve the site condition report. Required is the provision of baseline data for the site, as the operator has submitted a Site Condition Report, which uses generic estimations.

The operators agreed to the condition that we assume the site to be entirely uncontaminated. Should any contamination be discovered upon the surrender of their permit, it would be deemed to have resulted from their operation. This would apply in the event of contamination by substances produced or released from the site's activities.

## **Nature conservation, landscape, heritage and protected species and habitat designations**

We have checked the location of the application to assess if it is within the screening distances we consider relevant for impacts on nature conservation, landscape, heritage and protected species and habitat designations. The application is within our screening distances for these designations.

Chiddingfold Forest SSSI.

We have assessed the application and its potential to affect sites of nature conservation, landscape, heritage and protected species and habitat designations identified in the nature conservation screening report as part of the permitting process.

We consider that the application will not affect any site of nature conservation, landscape and heritage, and protected species or habitats identified.

We have not consulted Natural England.

The decision was taken in accordance with our guidance.

## **Environmental risk**

We have reviewed the operator's assessment of the environmental risk from the facility.

The operator's risk assessment is satisfactory.

## **General operating techniques**

We have reviewed the techniques used by the operator and compared these with the relevant guidance notes and we consider them to represent appropriate techniques for the facility.

The operator has submitted a full BAT Conclusions review against the European Commission, establishing Best Available Techniques (BAT) Conclusions (BATc) for Waste Treatment, as detailed in document reference C (2018) 5070. The

operator has also confirmed full compliance with the requirements. Furthermore, the operator was given the opportunity to comment on the draft permit as part of the permit application. The operator has not raised any objections to the BAT requirements, nor stated that these cannot be met.

The operating techniques that the applicant must use are specified in table S1.2 in the environmental permit.

## **Operating techniques for emissions that screen out as insignificant**

The site has no point source emissions to air and fugitive emissions of dust have been screened out as insignificant, and so we agree that the applicant's proposed techniques are Best Available Techniques (BAT) for the installation.

We consider that the emission limits included in the installation permit reflect the BAT for the sector.

## **National Air Pollution Control Programme**

We have considered the National Air Pollution Control Programme as required by the National Emissions Ceilings Regulations 2018. By setting emission limit values in line with technical guidance we are minimising emissions to air. This will aid the delivery of national air quality targets. We do not consider that we need to include any additional conditions in this permit.

## **Fire Prevention Plan**

We have assessed the fire prevention plan and are satisfied that it meets the measures and objectives set out in the Fire Prevention Plan guidance.

The plan has been incorporated into the operating techniques S1.2.

## **Dust management**

We have reviewed the dust and emission management plan in accordance with our guidance on emissions management plans for dust.

All waste treatment will be conducted within the confines of a fully enclosed building. There are no point source emissions to air outside the building, any fugitive emissions generated are extracted via LEV, fed through a HEPA filter and collected.

We consider that the dust and emission management plan is satisfactory and we approve this plan.

We have approved the dust and emission management plan as we consider it to be appropriate measures based on information available to us at the current time. The applicant should not take our approval of this plan to mean that the measures in the plan are considered to cover every circumstance throughout the life of the permit.

The applicant should keep the plans under constant review and revise them annually or if necessary sooner if there have been complaints arising from operations on site or if circumstances change. This is in accordance with our guidance 'Control and monitor emissions for your environmental permit.

The plan has been incorporated into the operating techniques S1.2.

## **Raw materials**

We have specified limits and controls on the use of raw materials and fuels.

## **Waste types**

We have specified the permitted waste types, descriptions and quantities, which can be accepted at the regulated facility.

We are satisfied that the operator can accept these wastes for the following reasons:

- they are suitable for the proposed activities
- the proposed infrastructure is appropriate; and
- the environmental risk assessment is acceptable.

## **Pre-operational conditions**

Based on the information in the application, we consider that we need to include pre-operational conditions.

We require a written commissioning plan for approval to ensure that environmental protection measures are in place. This plan is to include the expected emissions to the environment during the various stages of commissioning.

## **Emission Limits**

There are no point source emissions to land, air or water apart from uncontaminated water. There are no external site operational processes.

## **Monitoring**

We have decided that monitoring should be carried out for the parameters listed in the permit, using the methods detailed and to the frequencies specified.

These monitoring requirements have been included to ensure the maintenance of process efficiency and prevention of fugitive emissions.

We made these decisions in accordance with the BAT Conclusions for the Waste Treatment industry sector published on 10 August 2018 in the Official Journal of the European Union and Non-hazardous and inert waste: appropriate measures for permitted facilities.

## **Reporting**

We have specified the reporting requirements the Permit either to meet the reporting requirements set out in the IED, or to ensure data is reported to enable timely review by the Environment Agency to ensure compliance with permit conditions.

We made these decisions in accordance with Non-hazardous and inert waste: appropriate measures for permitted facilities Published 12 July 2021 and BAT Conclusions for the Waste Treatment industry sector published on 10 August 2018 in the Official Journal of the European Union.

## **Management System**

We are not aware of any reason to consider that the operator will not have the management system to enable it to comply with the permit conditions.

We only review a summary of the management system during determination. We have therefore only reviewed the summary points.

The operator's Environmental Management plan is certified against ISO 14001.

The decision was taken in accordance with the guidance on operator competence and how to develop a management system for environmental permits.

## **Technical Competence**

Technical competence is required for activities permitted.

The operator is a member of the CIWM/WAMITAB scheme

We are satisfied that the operator is technically competent.

## **Previous performance**

We have assessed operator competence. There is no known reason to consider the applicant will not comply with the permit conditions.

No relevant convictions were found. The operator satisfies the criteria in our guidance on operator competence.

## **Financial competence**

There is no known reason to consider that the operator will not be financially able to comply with the permit conditions.

## **Growth duty**

We have considered our duty to have regard to the desirability of promoting economic growth set out in section 108(1) of the Deregulation Act 2015 and the guidance issued under section 110 of that Act in deciding whether to grant this permit.

Paragraph 1.3 of the guidance says:

“The primary role of regulators, in delivering regulation, is to achieve the regulatory outcomes for which they are responsible. For a number of regulators, these regulatory outcomes include an explicit reference to development or growth. The growth duty establishes economic growth as a factor that all specified regulators should have regard to, alongside the delivery of the protections set out in the relevant legislation.”

We have addressed the legislative requirements and environmental standards to be set for this operation in the body of the decision document above. The guidance is clear at paragraph 1.5 that the growth duty does not legitimise non-compliance and its purpose is not to achieve or pursue economic growth at the expense of necessary protections.



We consider the requirements and standards we have set in this permit are reasonable and necessary to avoid a risk of an unacceptable level of pollution. This also promotes growth amongst legitimate operators because the standards applied to the operator are consistent across businesses in this sector and have been set to achieve the required legislative standards.

## **Consultation Responses**

The following summarises the responses to consultation with other organisations, our notice on GOV.UK for the public and the way in which we have considered these in the determination process.

### **Responses from organisations listed in the consultation section:**

Response received from: UK Health Security Agency

Brief summary of issues raised: UKHSA has no significant concerns regarding risk to health of the local population from the installation.

Ensuring that potential emissions (fugitive dust/particular matter) do not impact upon public health.

Ensure that there are adequate plans and procedures in place for fires and waste acceptance and rejection to prevent any potential significant off-site impact.

Summary of actions taken: We required the operator to submit a Dust Management Plan (DMP) in response to our Schedule 5 Notice. The approved DMP sets out measures to prevent dust from leaving the site, procedures for monitoring dust levels to ensure they remain within the site boundary, and actions to be taken if dust problems arise, including a timescale for resolving any issues.