Permitting Decisions- Environment Agency Initiated Variation

We have issued an Environment Agency initiated variation for Bredbury Waste Oil Recovery Facility operated by Pure Clean Waste Solutions Ltd following a review of the permit in accordance with Environmental Permitting (England and Wales) Regulations 2016, regulation 34(1).

The variation number is EPR/JP3031CY/V005.

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 regulated facility and varied the permit to make a number of changes to reflect relevant standards and best practice. These changes principally relate to the implementation of our technical guidance

- Chemical waste appropriate measures for permitted facilities and the relevant requirements of the BAT Conclusions for Waste Treatment which have been incorporated into our guidance.
- Waste electrical and electronic equipment (WEEE): Waste electrical and electronic equipment (WEEE): appropriate measures for permitted facilities and the relevant requirements of the BAT Conclusions for Waste Treatment which have been incorporated into our guidance.
- Non-hazardous and inert waste: appropriate measures for permitted facilities and the relevant requirements of the BAT Conclusions for Waste Treatment 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 in the operation and control of the plant and activities of the installation (operating techniques) against our technical guidance.

As well as considering the review of the operating techniques used by the Operator for the operation of the plant and activities of the installation, the consolidated variation notice takes into account and brings together in a single document all previous variations that relate to the original permit issue. Where this has not already been done, it also modernises the entire permit to reflect the conditions contained in our current generic permit template.

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.

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 the Environment Agency to review conditions in permits that it has issued and to ensure that the permit delivers compliance with relevant standards, within four years of the publication of updated decisions on Best Available Techniques (BAT) Conclusions.

The BAT Conclusions for Waste Treatment (the BREF) was published on 17 August 2018 following a European Union wide review of BAT, implementing decision (EU) 2018/1147 of 10 August 2018. Relevant existing facilities were expected to be in compliance with the BAT Conclusions within 4 years (i.e. by August 2022).

On 18 November 2020, Chemical Waste: appropriate measures for permitted facilities guidance was published on gov.uk. This technical guidance explains the standards that are relevant to regulated facilities with an environmental permit to treat or transfer chemical waste, providing relevant standards (appropriate measures) for those sites and incorporating the relevant requirements of the BAT Conclusions.

The following Appropriate Measures guidance is also applicable to the permitted activities being varied under this permit review and has been included in the operating techniques table:

Non-hazardous and inert waste: appropriate measures for permitted facilities - published 12 July 2021.

Waste electrical and electronic equipment (WEEE): appropriate measures for permitted facilities – published July 2022.

We issued a notice under regulation 61(1) of the Environmental Permitting (England and Wales) Regulations 2016 (a Regulation 61 Notice) on 15/11/2021 requiring the operator to provide information to confirm that the operation of their facility currently meets, or how it will subsequently meet, the standards (appropriate measures) described in our technical guidance.

The notice required that where the revised standards are not currently met, the operator should provide information that:

- Describes the techniques that will be implemented to ensure operations meet the relevant standards and by when, or
- Explains why they are not applicable to the facility in question, or
- Justifies why an alternative technique is appropriate and will achieve an equivalent level of environmental protection to the standards described in our guidance

The standards described in our technical guidance are split into 7 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

We have set emission limit values (ELVs) and monitoring requirements for relevant substances in line with our technical guidance and the BAT Conclusions for Waste Treatment, unless a tighter, i.e. more stringent, limit was previously imposed and these limits have been carried forward.

The Regulation 61 notice required the operator to confirm whether they could comply the standards described in each of these chapters. 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

In accordance with Article 22(2) of the Industrial Emissions Directive, the Regulation 61 notice asked the operator to provide a soil and groundwater risk assessment, along with a baseline report or summary report confirming the current state of soil and groundwater contamination, where listed activities are undertaken that involve the use, production of release of relevant hazardous substances.

The Regulation 61 notice also asked the operator to confirm whether they operate a medium combustion plant or specified generator (as per Schedule 25A or 25B of EPR 2016) and whether they had considered how their operations could be affected by climate changes (e.g. through a climate change adaptation plan).

Our assessment of the responses received from the operator regarding soil and groundwater risk assessment, medium combustion plant and specified generators, and consideration of climate change are also summarised in Table 1.

The Regulation 61 notice response from the Operator was received on 24/02/2022.

We considered that the response did contain sufficient information for us to commence determination of the permit review.

Although we were able to consider the Regulation 61 notice response generally satisfactory at receipt, we needed more information in order to complete our permit review assessment. We requested this by email and the operator provided further information on treatment and storage capacities, EWC codes accepted, general management appropriate measures, waste pre-acceptance. acceptance and waste 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, revised site plans on 09/08/2024, 30/09/2024, 29/10/2024, 18/12/2024, 21/01/2025, 27/03/2025, 03/07/2025, 04/07/2025 and 29/07/2025. We made a copy of this information available on our public register.

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
General management appropriate measures	FC	The Operator confirmed that they do not currently comply with all the general management appropriate measures given in the guidance. The Operator stated within their Regulation 61 response that they do not have an up-to-date Site Condition Report, or a Climate Change Risk Assessment, but these would be updated by December 2022. They went on to state that they did not have specific contingency procedures and they did not have a specific site closure and decommissioning plan, but again, this would be updated by December 2022. A request for information was issued (dated 26/07/2024) requesting confirmation that these documents were now up-to-date. The Operator stated that the Site Closure and Decommissioning Plan and Climate Change Risk Assessment were now up-to-date but that they did not have an up-to-date Site Condition Report but that this document would follow. The Operator did not acknowledge the requirement for a specific contingency plan. On the 30/09/2024 further information was provided that stated a Site Condition Report would be available by March 2025, however this has not been forthcoming. It was therefore deemed necessary to include an improvement condition (IC3) to demonstrate that the following appropriate measures of the guidance will be met: • *Section 2 General management appropriate measures:*

		2.1. Management system *- You must have and follow an up-to-date, written management system that incorporates the following environmental performance features:* *You have and maintain the following documentation:* *- site condition report.* *(appropriate measure 2.1.1.)* ***2.5. Contingency plan and procedures*** *- You must have and implement a contingency plan, which makes sure you:* • *comply with all your permit conditions and operating procedures during maintenance or shutdown at your site, or elsewhere* • *do not exceed storage limits in your permit and you continue to apply appropriate measures for storing and handling waste* • *stop accepting waste unless you have a clearly defined method of recovery or disposal and enough permitted storage capacity.* *(appropriate measure 2.5.1. of the Chemical waste: appropriate measures for permitted facilities guidance and appropriate measure 2.4.1. of the Non-hazardous and inert waste: appropriate measures for permitted facilities guidance)* *- You should have contingency procedures to make sure that, as far as possible, you know in advance about any planned shutdowns at waste management facilities where you send waste (appropriate measure 2.5.2. of the Chemical waste: appropriate measures for permitted facilities guidance and appropriate measure 2.4.2. of the Non-hazardous and inert waste: appropriate measures for permitted facilities guidance).*

		- You should consider whether the sites or companies you rely on in your contingency plan: • *can take the waste at short notice* • *are authorised to do so in the quantities and types likely to be needed – in addition to carrying out their existing activities.* *(appropriate measure 2.5.4. of the Chemical waste: appropriate measures for permitted facilities guidance and appropriate measure 2.4.4. of the Non-hazardous and inert waste: appropriate measures for permitted facilities guidance)* *- You should not discount alternative disposal or recovery options on the basis of extra cost or geographical distance if doing so means you could exceed your permitted storage limits, or compromise your storage procedures (appropriate measure 2.5.5. of the Chemical waste: appropriate measures for permitted facilities guidance and appropriate measure 2.4.5. of the Non-hazardous and inert waste: appropriate measures for permitted facilities guidance).* *- You must not include unauthorised capacity in your contingency plan. If your contingency plan includes using temporary storage for additional waste on your site, you must make sure your site is authorised for this storage and you have the appropriate infrastructure in place (appropriate measure 2.5.6. of the Chemical waste: appropriate measures for permitted facilities guidance and appropriate measure 2.4.6. of the Non-hazardous and inert waste: appropriate measures for permitted facilities guidance).*

		Treatment only *- Your management procedures and contingency plan must:* • *identify known or predictable malfunctions associated with your technology and the procedures, spare parts, tools and expertise needed to deal with them* • *include a record of spare parts held, especially critical spares – or state where you can get them from and how long it would take* • *have a defined procedure to identify, review and prioritise items of plant which need a preventative maintenance regime* • *include all equipment or plant whose failure could directly or indirectly lead to an impact on the environment or human health* • *identify 'non-productive' or redundant items such as tanks, pipework, retaining walls, bunds, mobile plant, reusable waste containers (for example wheeled carts), ducts, filters and security systems* • *make sure you have the spare parts, tools, and competent staff needed before you start maintenance.* *(appropriate measure 2.5.7. of the Chemical waste: appropriate measures for permitted facilities guidance and appropriate measure 2.4.7. of the Non-hazardous and inert waste: appropriate measures for permitted facilities guidance)* *- If you produce an end-of-waste material at your facility, your contingency planning must consider issues with storage capacity for end-of-waste products and materials that fail the end-of-waste specification (appropriate measure 2.5.8. of the*

		Chemical waste: appropriate measures for permitted facilities guidance and appropriate measure 2.4.8. of the Non-hazardous and inert waste: appropriate measures for permitted facilities guidance). *- Your management system must include procedures for auditing your performance against all of these contingency measures and for reporting the audit results to the site manager (appropriate measure 2.5.9. of the Chemical waste: appropriate measures for permitted facilities guidance and appropriate measure 2.4.9. of the Non-hazardous and inert waste: appropriate measures for permitted facilities guidance).* In addition, a further improvement condition (IC9) was included to undertake a review of the Site Condition Report to ensure Article 22 of the Industrial Emissions Directive is complied with. The review shall include at least the following: *i) consideration of waste storage and treatment areas including storage vessels, bunds, loading and unloading areas and other potential sources of contamination as shown in the site location plan* *ii) reference to any historical spillages, the chemicals involved and locations, baseline soil sample results and groundwater data.* Compliance with the appropriate measures in this section of the guidance has been incorporated into the varied permit through the updated operating techniques listed in Table S1.2.

Waste pre-acceptance, acceptance and tracking appropriate measures	FC	The Operator confirmed that they do not currently comply with all the waste pre-acceptance, acceptance and waste tracking appropriate measures given in the guidance. For the waste pre-acceptance appropriate measures, the Operator stated within their Regulation 61 response that they do not currently obtain in writing or electronically for the following information: 1. *Any persistent organic pollutants (POPs) present* 2. *The potential for self-heating, self-reactivity or reactivity to moisture or air* 3. *Any odour* 4. *Its age, that is when first became waste* The Operator stated that they do the following: *We collect and accept a standard range of wastes so to ensure we are capturing all the relevant details required in the appropriate measures standard we will respond to a new customer order by sending an email confirming all the details of the collection and the caveats of the wastes; informing the customer by signing the PDA on collection they are confirming the waste(s) meet the specification. Also included will be confirmation the waste has been produced within the year of collection.* It was also not clear from the information provided in their Regulation 61 response whether they complied with all waste acceptance (including acceptance sampling) measures. A request for information was issued (dated 26/07/2024) requesting confirmation that information related to the 4 parameters listed above were collected or provide additional justification as to why it was not considered appropriate to collection this information. The Operator confirmed (on 09/08/2024) that this was information that

		they now collected. A further request for information was issued (dated 16/09/2024) requesting clarification on whether the Operator was in compliance with the waste pre-acceptance, acceptance and tracking appropriate measures in their entirety. On 30/09/2024 further information was provided by the Operator, which stated: *Pure Clean Waste Solutions Ltd comply with all the Appropriate Measures for the Waste brought back to its site and stored ready for final disposal. This includes hazardous and non- hazardous wastes*. However, in terms of acceptance sampling, the Operator stated we *will be taking 'add hock' samples of the wastes arriving on site and testing them for conformity. This will include Water Content, Chemical Oxygen Demand etc*. The acceptance sampling appropriate measures states: *27. You must representatively sample **all** wastes, bulk or containerised (including from every container) at the acceptance stage, and carry out verification and compliance testing. You must not just rely on the written information supplied.* It was therefore deemed necessary to include an improvement condition (IC4) to review and update their waste acceptance procedures to ensure that they meet the requirements of the Environment Agency's guidance Chemical waste: appropriate measures for permitted facilities. Specifically: *3.2. Waste acceptance* ***Acceptance sampling***

		Appropriate measures 3.2.27. to 3.2.39. *A copy of the updated procedure(s) shall be updated to the Environment Agency for approval.* Compliance with the appropriate measures in this section of the guidance has been incorporated into the varied permit through the updated operating techniques listed in Table S1.2.
Waste storage, segregation and handling appropriate measures	FC	The Operator confirmed that they do not currently comply with all the waste storage, segregation and handling appropriate measures. For the waste storage, segregation and handling appropriate measures, the Operator stated within their Regulation 61 response that they do not comply as follows: ***5. Waste Storage Area Signage*** *We do not currently show the maximum quantity is and hazardous properties of waste that can be stored in these areas. However, all this information available in the Operational Working Plan and Yard Handbook which all operatives are issued with.* ***9. Storage of certain wastes undercover*** *We do not currently have or access to undercover storage for wastes such as rags and filter materials contaminated with metal swarf, low boiling point oils or low flash point solvents. All stocked waste is currently inspected every day as part of the Daily Site Inspection*.

		We will obtain a 'Heat Gun' to check the temperatures of the waste drums which will become part of the heat detection for all stored products. *All containers on site are sealed and covered to prevent water ingress.* A request for information was issued (dated 26/07/2024) which stated that the Environment Agency did not consider that the alternative measures proposed for 'waste storage area signage' (i.e. information bring available in the Operational Working Plan and Yard Handbook) were sufficient alternative measures to those in the guidance. They were therefore asked if they were able to confirm if they still did not comply with these appropriate measures and/or whether they had implemented or planned to implement measures that will ensure compliance with the appropriate measures or whether they were able to provide information that they considered to be suitable alternative measures. The Operator responded on 09/08/2024 by stating: *We plan to introduce new site signs to comply with the appropriate measures as follows:* • *Flam Store – maximum Storage Capacity and Hazardous properties will be attached to the Flam Store.* • *Yard signage showing the Maximum Storage Capacity and Hazardous properties will be displayed in the relevant locations around the yard.* A request for information was issued (dated 26/07/2024) which stated that the Environment Agency did not consider that the alternative measures proposed for 'storage of

		wastes undercover' (i.e. daily checks and use of a heat gun) were sufficient alternative measures to those in the guidance because the appropriate measures state the following: *you must store wastes in sealed metal containers under cover if they have the potential for self-heating or self-reactivity. You must monitor the containers for heat build-up. Such wastes include rags and filter materials contaminated with metal swarf, low boiling point oils or low flash point solvents*. They were therefore asked if they were able to confirm if they still did not comply with these appropriate measures and/or whether they had implemented or planned to implement measures that will ensure compliance with the appropriate measures or whether they were able to provide information that they considered to be suitable alternative measures. The Operator responded on 09/08/2024 by stating: • *Contaminated Rags – we now use a company who launder our dirty rags and return them clean. These rags are stored in bags which are stored under cover prior to disposal.* • *Cloths (Oil Contaminated) – these wastes will now be stored undercover in UN approved closed top 205 litre drums prior to disposal from site***.** A request for information was issued (16/09/2024) related to the storage of wastes undercover as their response did not deal with wastes that they may store on site other than rags and cloths. The Operator was asked to confirm if all relevant wastes are or will be stored in sealed metal containers under cover if they have the potential for self-heating or self-reactivity. The Operator must monitor the containers for heat build-up. Such wastes include rags and filter materials contaminated with metal swarf, low boiling point oils or low flash point solvents. The Operator was

		asked that if they did not comply with the appropriate measures, please provide justification for not complying and/or alternative measures they employed. The Operator responded on 30/09/2024 by stating: *All relevant wastes will be stored in sealed UN Approved containers under cover if they have the potential for self-heating or self-reactivity. We will monitor the containers for heat build-up*. During the assessment of the Operator's Regulation 61 response and their current permit, it was also unclear if the Operator complied with the appropriate measures for aerosol storage. A request for information was issued (17/10/2024) requesting that the Operator confirm whether or not they comply with all of the appropriate measures listed in aerosol storage section of the waste storage appropriate measures (4.71. to 4.77.), including if any aerosol canisters are stored under cover in well-ventilated containers and within a caged storage area. The Operator responded on 29/10/2024 by stating: *Aerosols are stored under cover (Flam Store) in ventilated containers. Currently they are stored in adapted plastic IBC's with a mesh lid to prevent 'missiling' or 'ejection' of the canisters and 205 litre drums with bungs on pallets.* *We are looking into a practical alternative solution for the containment of the aerosols in IBC's such as a 'Waste Safe' to increase the ventilation of the canisters but no decisions have been made as yet to change from the current method of storage*. Further information was received from the Operator on 18/12/2024, which stated:

		Based on the Appropriate Measures for Aerosols 4.71 to 4.77 the company has decided to purchase a Steel Safe (example on attached document Fig 2. 4. Appropriate measures for Waste Storage & Handling) to ensure they fully comply with these measures. This will ensure the aerosol have adequate ventilation, secure containment of aerosols & liquids and is a fully enclosed unit. The Steel Safe will be stored in a location away from all buildings and Flammable storage locations. It was therefore deemed necessary to include an improvement condition (IC5) as although the Operator had committed to complying with the relevant appropriate measures, they had yet to demonstrate compliance. IC3 has therefore been included for the Operator to review and update their waste storage, segregation and handling appropriate procedures to ensure that they meet the requirements of the Environment Agency's guidance Chemical waste: appropriate measures for permitted facilities. Specifically: • *Section 4 Waste storage, segregation and handling appropriate measures:* ***Hazardous waste signage*** *- You must clearly mark hazardous waste storage areas and provide signs and provide signs showing the maximum quantity and hazardous properties of wastes that can be stored there (appropriate measure 4.5).* ***Storage of waste under cover*** *- You must store wastes in sealed metal containers under cover if they have the potential for self-heating or self-reactivity. You must monitor the containers for heat build-up. Such wastes include rags and filter materials contaminated with metal swarf, low boiling*

		point oils or low flash point solvents (appropriate measure 4.9). ***Aerosol storage*** *- You must store aerosol canisters under cover in secure, well-ventilated containers, and within caged storage areas. You must also store them in a well-vented place that is not subject to extreme temperatures or direct sunlight. You must not store canisters in open containers to prevent the risk of them spreading fires by 'missiling' or 'ejection' (appropriate measure 4.71).* *- You must segregate aerosol canisters from other flammable wastes and potential sources of ignition. Preferably put them in a separate building, or use a fire resistant enclosure or fire wall. You must not hold any combustible material within the storage area, other than the canister's packaging, containers and the pallets on which they stand (appropriate measure 4.72).* *- You must provide suitable containment measures (for example drip trays) for aerosol canisters held in containers which cannot collect and hold free liquids released from the canisters. Or you should transfer them to secure containers that are able to hold free liquid (appropriate measure 4.73).* *- During storage, lids on containers holding aerosol canisters must remain securely closed at all times when not being filled, emptied or internally inspected. When not in use, the doors or hatches of cages must remain closed and locked (appropriate measure 4.74).* *- You must not overfill containers used to store canisters. Overfilling can result in canisters being actuated and discharging their contents, either:* • *under the weight of the canisters above them*

		• *when the container lid is closed* • *when containers are stacked* *(appropriate measure 4.75)* *- Cages used to store aerosol canister containers must be robust, fire resistant and of an appropriate mesh size (based upon the size of the canisters being stored). This is to constrain the canisters and prevent any ejection. Where the cage is not constructed with a mesh roof, the mesh wall panels must extend into the roof space of the storage area to make sure that the structure is completely enclosed (appropriate measure 4.76).* *- You should store aluminium canisters separately from steel canisters (especially rusting canisters). This will:* • *prevent thermite sparks during storage, handling and treatment* • *allow the different metals to be more easily recovered.* *(appropriate measure 4.77)* *A copy of the updated procedure(s) shall be submitted to the Environment Agency for approval. The Operator shall implement any improvements within the timescale(s) agreed with the Environment Agency.* Compliance with the appropriate measures in this section of the guidance has been incorporated into the varied permit through the updated operating techniques listed in Table S1.2.
Waste treatment appropriate measures	FC	The Operator confirmed that they do not currently comply with all the waste treatment appropriate measures given in the guidance. For the waste treatment appropriate

		measures, the Operator stated within their Regulation 61 response that they do not currently comply as follows: ***5.1 General Waste Treatment*** ***2. Written details of treatment activities*** *All treatment activities have Risk Assessments, Operating Working Procedures including start-up and shut-down procedures, Pre-start-up check sheets and regular maintenance document checks sheets, however we do not include the following details listed in the Waste treatment appropriate measures guidance: -* • *Simplified process flowsheet that show the origin of any emissions* • *Details of emission control and abatement techniques for emissions to air and water, including details of their performance* • *Details of chemical reactions and their reaction kinetics and energy balance* • *Details of biological treatment processes* • *Details of effluent treatment* • *A description of any flocculants or coagulants used* • *The control system philosophy and how the control system incorporates environmental monitoring information,* *These are not included because they are not applicable to the processes -* • *Sorting and crushing of Oil Filters to remove excess oil prior to being sent off site for final recovery (oil filters and oil).*

		• *Draining and shredding of plastic waste prior to being sent off site to be recycled.* • *Waste solvents are emptied into tanks and filtered before being pumped into bulk tanks for distribution to offsite recovery.* ***5.2 Aerosol Canister treatment*** *Aerosol treatment is not performed or permitted on this site.* A request for information was issued (dated 26/07/2024) which stated that the Environment Agency did not agree that the above was not applicable to the site's treatment processes as the Operator stores and treats waste, where emission points may be present and where emissions may be generated and where abatement may be required. These include: • the use of the 'Kruncher' to segregate the oil and crush oil filters. • the shredding of contaminated plastic containers. • the decanting and storage of waste solvents and waste oils. The Operator was therefore asked to consider the points above, identify the potential for emissions from these activities, which need to be quantified and controlled, or to provide justification for section 5 of the appropriate measures not being applicable to their processes The Operator responded on 09/08/2024 by stating that the company had decided not to continue with the following

		waste treatment processes: 1) ‘Kruncher’. 2) Shredding of plastic. 3) Decanting of wasting solvents. However, after further discussions, the Operator confirmed on 30/09/2025, that they wished to retain the ability to crush oil filters via the ‘Kruncher’ via the insertion of an improvement condition, in order for them to ensure compliance with the relevant appropriate measures. To better understand the treatment process, a request for information was issued (17/10/2024) to determine if the ‘Kruncher’ referred to in the Regulation 61 response was a fully enclosed system, whether it has any emissions points (e.g. vent, pressure relief valve, etc.) and whether there is any abatement associated with this treatment activity. Further information was received from the Operator on 29/10/2024, which stated that process is not within a fully enclosed system and the site is not currently using this machine to crush oil filters to extract the oil. The Operator further confirmed on 18/12/2024 that the ‘Kruncher’ is not currently in use and that the area is now being used for storage. As the Operator confirmed that this activity was not operational, and it did not comply with the appropriate measures (e.g. the treatment activity was not enclosed) it was therefore determined that the most appropriate approach was to ‘mothball’ the activity. The activity of crushing oil filters has been retained in the permit (AR7 within Table S1.1) but the recommencement of activities is subject to the conditions of pre-operational condition 1 (PO1), which is present within Table S1.4: *Prior to the recommencement of activity AR7 authorised by Table S1.1, including any waste acceptance, storage and treatment which are in temporary cessation under this variation notice, the Operator shall apply to the Environment Agency to vary the permit and provide*

		supporting documents in accordance with the requirements of the Waste Treatment BAT conclusions and Chemical Waste: appropriate measures for permitted sites and other appropriate measures guidance as applicable. *Specifically:* *The operator shall review and update their waste treatment procedures, specifically with reference to the crushing/treatment of oil filters (activity AR7), to ensure that they meet the requirements of the Environment Agency's guidance Chemical waste: appropriate measures for permitted facilities referred to in Table S1.2. Specifically, the operator must demonstrate that the following appropriate measure(s) of the guidance will be met:* *Waste treatment appropriate measures:* *5.1. General waste treatment* *5.1.10. Where an emission is expected, all treatment or reactor vessels must be enclosed. Only vent them to the atmosphere via an appropriate scrubbing and abatement system (subject to explosion relief).* *Emissions Control appropriate measures:* *6.1. Point source emissions to air* *6.1.1. You must contain storage tanks, silos and waste treatment plant (including shredders) to make sure you collect, extract and direct all process emissions to an appropriate abatement system for treatment before release.* *6.2. Fugitive emissions to air (including odour)*

		6.2.2. You must design, operate and maintain storage and treatment plant in a way that prevents fugitive emissions to air, including dust, organic compounds and odour. Where that is not possible, you must minimise these emissions. Storage and treatment plant includes associated equipment and infrastructure such as: • *shredders* • *conveyors* • *skips or containers* • *building fabric, including doors and windows* • *pipework and ducting* *The activities permitted shall only recommence once the permit variation has been issued by the Environment Agency.* The solvent decanting treatment process and the shredding of plastic treatment process have both been removed from the permit, as a result of the information provided by the Operator. Compliance with the appropriate measures in this section of the guidance has been incorporated into the varied permit through the updated operating techniques listed in Table S1.2.
Emissions control appropriate measures	FC	The Operator confirmed that they do not currently comply with all the emissions control appropriate measures given in the guidance. For the emissions control appropriate measures, the Operator stated within their Regulation 61 response that they do not currently comply as follows: *There are no emissions points to air, water or land. Site drainage is collected in the oil interceptor and discharged to foul sewer. We do have a consent to discharge from United Utilities.*

		All wastes are solid or wet, therefore fugitive dust emissions are not an issue on this site. ***6.3 Fugitive Emissions to air*** *Other measures for dust, mud and litter* *Other measures for odour* *Other measures for noise and vibration* *We have screened out the impact of fugitive emissions to air, water and land and odour and noise under normal and abnormal events based on:* • *Non continuous batch operations, 0700 – 1500hrs operations.* • *The design of the site ensures that potentially contaminated site drainage is not discharged to surface waters. This feature removes the pathway for the hazardous materials to enter the nearby aquatic environment.* • *No highly sensitive receptors close by and no housing within 500m* • *No emissions to air of substances covered in the air quality management zone* • *No known nuisance issues regarding dust, odour or noise* • *Good housekeeping, operating procedures and site emergency plan* • *Daily visual checks around site* ***12. Produce and implement a spillage response plan and train staff to follow it and test it.*** *We do have a spillage response plan under the heading 'Emergency Action Plan' and also conduct 'Spillage Training' as part of our training program. We do not currently test this, but we will add testing to our annual*

		plan. A request for information was issued (dated 26/07/2024) which stated that it was noted that elsewhere within their Regulation 61 response, in section 'non-technical summary' that: *the only emission points to air are from the four storage tank ventilation points*. From the activities on site, and the type of waste stored and treated on site, there is also the possibility for emissions (for example, VOCs) to be generated, and therefore the need for emissions control to be in place. The Operator responded on 29/10/2024 by stating that they intended to fit carbon filter abatement to the tanks within their tank farm (W01, W02, W03 and WS1) and on 21/01/2025 the following information was supplied: *All Tank Vent Outlets (WS1, WO1, WO2 and WO3) will be piped to a manifold with non-return valves using flexible pipework and then diverted through one carbon VOC's Filter to the atmosphere*. As the Operator has confirmed that they no longer wish to shred contaminated plastic containers or to carry out solvent decanting (as has been described elsewhere in this document – please see waste treatment section above), then the emissions control appropriate measures will therefore not apply. The need for emissions control for the treatment of oil filters (via the use of the 'Kruncher') will be addressed via pre-operational condition 1 (PO1). It was therefore deemed necessary to include an improvement condition (IC6) as although the Operator had committed to complying with the relevant appropriate measures (i.e. the need to install abatement), they had yet to demonstrate compliance. Bulk storage of wastes may require the tank or vessel to be vented. This vent should

		be considered an emission point, but the BAT-AEL will not be used for storage. However, abatement should be used which must be fit for purpose, for example bulk solvent storage vessels should be linked to a carbon filter. IC6 has therefore been included for the Operator to review and update their emissions control procedures, specifically with reference to the storage of hazardous waste oils and solvents (including the decanting and storage of waste odourless kerosene) (activity AR1) and storage of non-hazardous liquid waste (activity AR11), to ensure that they meet the requirements of the Environment Agency's guidance Chemical waste: appropriate measures for permitted facilities and Non-hazardous and inert waste: appropriate measures for permitted facilities. Specifically, the operator must demonstrate that the following appropriate measure(s) of the Chemical waste: appropriate measures for permitted facilities guidance will be met: • *Section 4 Waste storage, segregation and handling appropriate measures:* *- You should vent bulk storage tanks and silos through suitable abatement.* *(appropriate measure 4.43. Applies to the storage of hazardous waste oils and solvent (activity AR1) and storage of non-hazardous liquid waste (activity AR11))* *- Repackaging or mixing must only take place in a dedicated area or store which has the plant and equipment needed to deal with the specific risks of that process. For example, this could include abatement or local exhaust ventilation.* *(appropriate measure 4.86. Applies to the repackaging of non-hazardous waste (activity AR2) and repackaging of non-hazardous waste (activity AR8))*

		• *Section 6 Emissions Control appropriate measures:* *6.1 Point source emissions to air* *- You must contain storage tanks, silos and waste treatment plant (including shredders) to make sure you collect, extract and direct all process emissions to an appropriate abatement system for treatment before release.* *(appropriate measure 6.1.1. Applies to the storage of hazardous waste oils and solvent (activity AR1), decanting of solvent (AR8), and storage of non-hazardous liquid waste (activity AR11)))* *6.2 Fugitive emissions to air (including odour)* *- You must design, operate and maintain storage and treatment plant in a way that prevents fugitive emissions to air, including dust, organic compounds and odour. Where that is not possible, you must minimise these emissions. Storage and treatment plant includes associated equipment and infrastructure such as:* • *shredders* • *conveyors* • *skips or containers* • *building fabric, including doors and windows* • *pipework and ducting* *(appropriate measure 6.2.2. Applies to the storage of hazardous waste oils and solvent (Activity AR1), decanting of solvent (AR8), and storage of non-hazardous liquid waste (activity AR11))* Specifically, the operator must demonstrate that the following appropriate measure(s) of the Non-hazardous and inert waste: appropriate measures for permitted facilities guidance will be met:

		• *Section 6 Emissions Control:* *6.2 Point source emissions to air (channelled emissions)* *- You must use appropriate measures to make sure that you collect, extract and direct all process emissions to an appropriate abatement system for treatment before release.* *(appropriate measure 6.2.1. Applies to the storage of non-hazardous liquid waste (Activity AR11))* *A copy of the updated procedure(s) shall be submitted to the Environment Agency for approval. The Operator shall implement any improvements within the timescale(s) agreed with the Environment Agency.* We have also included IC8a (abatement system) and IC8b (abatement system) that requires the Operator subject to Environment Agency approval, to submit a plan for the installation, maintenance and operation of an abatement system to prevent or minimise emissions of VOCs and odour in accordance with chemical waste: appropriate measures for permitted facilities section 6.1. IC8a: *The operator shall submit a plan to the Environment Agency for approval as required by section 6.1, of Chemical waste: appropriate measures for permitted facilities (e.g. 6.1.1: "You must contain storage tanks, silos and waste treatment plant (including shredders) to make sure you collect, extract and direct all process emissions to an appropriate abatement system for treatment before release".) for the enclosure, extraction and collection installation and maintenance and operation of an abatement system for the reduction of [e.g. VOCs] from*

		the [solvent/oil storage /treatment] tanks on site. *The plan shall detail:* • *the design of the abatement system;* • *the monitoring measures in place for;* - *optimising and maintaining the operation;* - *optimising performance of the [carbon filters/bag filters/other abatement for example wet scrubbers];,* - *identifying optimal regeneration or replacement;.* • *The timescale for implementation.* *The plan shall be implemented in accordance with the Environment Agency's written approval.* *IC8b:* *The agreed abatement system(s) approved under IC8a shall be installed and operated in accordance with the Environment Agency's written approval*. Compliance with the appropriate measures in this section of the guidance has been incorporated into the varied permit through the updated operating techniques listed in Table S1.2.
Emissions monitoring and limits appropriate measures	FC	The Operator confirmed that the emissions control appropriate measures given in the guidance are not appropriate to their site. They also state that they do not have an up-to-date emissions inventory for point source emissions to air and water. The chemical waste appropriate measures guidance section 7 states: *you must create and maintain and emission inventory of point source emissions to air and*

		*water (including emissions to sewer) for your facility (*appropriate measure 7.2*)*. This is also supported by the chemical waste appropriate measures guidance section 6 'emissions control appropriate measures', which also states that *you must identify the main chemical constituents of the site's point source emissions to air, water and sewer as part of the site's inventory of emissions (*appropriate measure 6.1.2*).* A request for information was issued (dated 26/07/2024) requesting that the Operator confirm that they had an up-to-date emissions inventory. However, the Operator has neither provided or confirmed that they have an up-to-date emissions inventory. As such, the Operator isn't currently in compliance with the appropriate measures. We have therefore included improvement conditions IC7a (Updated emissions inventory and H1) and IC7b (Updated H1 risk assessment), that require the Operator, subject to Environment Agency approval, to propose a monitoring programme, and then to undertake monitoring to characterise and assess emissions from the tanks. IC7a: *The Operator shall submit a written report to the Environment Agency for approval that proposes a monitoring programme to fully characterise and assess the facility's point source emissions to air.* *The monitoring programme shall be designed to fulfil all the requirements of Chemical waste: appropriate measures for permitted facilities 6.1.2. "You must identify the main chemical constituents of the site's point source emissions as part of the site's inventory of emissions to air" and 7.1.1. "Your facility's emissions inventory must*

		include information about the relevant characteristics of point source emissions to air, such as the: • *Average values and variability of flow and temperature* • *Average concentration and load values of relevant substances and their variability* • *Flammability, lower and higher explosive limits and reactivity* • *Presence of other substances that may affect the waste gas treatment system or plant safety – for example, oxygen, nitrogen, water vapour, dust."* *The report shall:* *a) detail the parameters and substances that will be tested for.* *b) include proposals for monitoring as a minimum the following parameters: those listed in Schedule 3, Table S3.1 or define own list or present conclusive evidence to suggest any parameter is not present/relevant in the emission.* *c) detail the monitoring methods, equipment and frequency to be used and justify any alternatives to the methods set out in Schedule 3, Table S3.1 for monitoring the listed parameters.* *d) confirm with supporting evidence that the monitoring will be representative of worst-case conditions – i.e. operating with typical waste streams at maximum plant throughput.* *e) establish a timetable for undertaking the monitoring.* *The monitoring programme shall be carried out as approved by the Environment Agency*.

		IC7b: *The operator shall submit a written report to the Environment Agency for assessment and written approval as required by section 6.1.2. of Chemical waste: appropriate measures for permitted facilities. "You must identify the main chemical constituents of the site's point source emissions as part of the site's inventory of emissions to air" and 6.1.3. "You must assess the fate and impact of the substances emitted to air, following the Environment Agency's risk assessment methodology."* *The report must include:* *a) the results and conclusions of the emissions monitoring and assessment undertaken in accordance with the approved monitoring programme under condition IC7a.* *b) the results and conclusions from an assessment of the environmental impact of the emissions to air using all relevant parameters identified from the monitoring programme proposed under condition IC7a. The assessment must screen parameters using the BAT AEL where they are set and actual emissions monitoring data for emissions where BAT AELs are not set and be carried out using the Environment Agency's 'H1 Environmental Risk Assessment' tool (or equivalent as agreed with the Environment Agency) and/or modelling as required following our guidance:* Air emissions risk assessment for your environmental permit - GOV.UK *Where it is concluded that the impact of the emission may be significant or is exceeding an environment standard (e.g. an environmental quality standard EQS)*

		The operator shall: c) Based on the outcome of the H1 assessment, propose emission limits, if required. Based on the outcome of the H1 assessment: d) Proposals for measures to mitigate the emission to meet the relevant emission limit such as (additional) abatement and timescales for the implementation of the measures, if required. *The proposals shall be implemented within 6 months of approval of the report or as agreed in writing by the Environment Agency*. IC7a and IC7b have been included (principally for considering the emissions from the bulk storage tanks on site) as the Operator has stated that "*all Tank Vent Outlets (WS1, WO1, WO2 and WO3) will be piped to a manifold with non-return valves using flexible pipework and then diverted through one carbon VOC's Filter to the atmosphere*." This point source emission source needs to be quantified and assessed through a H1 assessment, to determine if for example, emission limits are needed. Compliance with the appropriate measures in this section of the guidance has been incorporated into the varied permit through the updated operating techniques listed in Table S1.2.
Process efficiency appropriate measures	CC	The Operator confirmed that they do not currently comply with all the process efficiency appropriate measures, but all relevant parts of the documents they have will be consolidated into an energy efficiency plan and energy balance record ready for approval at their ISO Integrated Management System Review meeting scheduled for

		December 2022. A request for information was issued (dated 26/07/2024) requesting confirmation that the relevant documents were up to date. The Operator responded (09/08/2024) confirming an Energy Efficiency Plan was present and up to date. Compliance with the appropriate measures in this section of the guidance has been incorporated into the varied permit through the updated operating techniques listed in Table S1.2.
Reg 61 requirement	**Assessment of response received**	
Soil and groundwater risk assessment	There is no current site condition report in place and therefore an Improvement condition (IC9) has been inserted into the Permit.	
Medium combustion plant and specified generators	The operator confirmed that there is no combustion plant associated with the permitted activity.	
Climate change	The Operator has not completed a climate change assessment. Climate Change adaption will be delivered through the Environmental Management System condition.	
Summary of other changes made to the permit as a result of our assessment of the Reg 61 response		
Change	**Reason for change**	
Schedule 1 – Operations: Changes to Table S1.1 (activities) of the permit.	Following a review of the activities on site and the information present within the permit, Table S1.1 (activities) have been updated to present the permitted activities in accordance with the current permit template. The following activities have been amended in Table S1.1: • Shredding of oil contaminated plastic containers (AR3 in the current permit) – This has been removed from the permit. The Operator confirmed on 09/08/2024 (further confirmed on 30/09/2024) that they no longer wish to continue with this treatment activity and it has therefore been removed.	

	• Solvent collection (AR5 in the current permit) – This is now a waste operation (AR8) in the revised permit, not a DAA. The Operator confirmed on 09/08/2024 (further confirmed on 30/09/2024) that they no longer wish to decant waste solvents. However, in a response (received 29/10/2024) to a further request for information the Operator explained that they still intended to decant Waste Odourless Kerosene (ODK) into storage tank WS1 only (they will not decant waste thinners solvents for example). They gave an explanation on 03/07/2025 as to what the solvent decanting involved and it was deemed appropriate to list it as a waste operation., IC4 (Emissions control procedures) has been included, which asks the Operator to review and update their emissions control procedures (including for the decanting and storage of waste odourless kerosene) to ensure that they meet the requirements of the Environment Agency's guidance: Chemical waste: appropriate measures for permitted facilities. • A Directly Associated Activity (DAA) (AR4) has been added for the external washing of empty drum/containers as this activity was described in the Operator's Regulation 61 response, and it was deemed necessary to include. The washing of the inside of drums is not permitted. • Treatment of oil filters – In the current permit this has been listed as a Directly Associated Activity (DAA) (AR2). However, it was deemed that this was a waste treatment operation in its own right and has therefore been moved within Table S1.1 and is now under the 'waste operations' section of this table as AR7. Furthermore, as described earlier in this document, it has been determined that the most appropriate approach was to 'mothball' the activity. The activity of crushing oil filters has been retained in the permit (AR7 within Table S1.1) but the recommencement of activities is subject to the conditions of pre-operational condition 1 (PO1), which is present within Table S1.4. • Within the current permit there is an activity (AR9), which permits the physical treatment, sorting and segregation of non-hazardous waste, along with the repackaging and storage of non-hazardous waste. This has been retained, but for clarity, AR9 has been split into three separate activities: the repackaging of non-hazardous waste (AR9); the physical treatment, manual sorting and segregation of non-hazardous waste (AR10); the storage of non-hazardous waste (AR11).
Schedule 1 – Operations: Changes to Table S1.2 (Operating techniques) of the permit.	Reference to 'Sector Guidance Note IPPC 5.06. Recovery and Disposal of Hazardous and Non-Hazardous waste' has been removed from the permit, as this has been superseded by 'Chemical waste: appropriate measures for permitted facilities Version published 18 November 2020' and 'Non-hazardous and inert waste: appropriate measures for permitted facilities Version published 12 July 2021'. The appropriate measures have been inserted into Table S1.2 of the permit. Table S1.2 has also been updated with relevant Operating Techniques as necessary.
Schedule 1 – Operations: Changes to Table	Within the current permit there are two ICs (IC1 and IC2) that are marked as 'complete'. IC1 refers to the

S1.3 (Improvement programme requirements) of the permit.	requirement to submit a revised Environmental Management System and IC2 refers to the requirement to submit a infrastructure improvement plan. As they have been completed, they have been removed from the permit. Table S1.3 has also been updated with the insertion of relevant Improvement Conditions (ICs) as necessary – please see elsewhere in this document (please see section 'improvement programme', below) for further information on what ICs have been inserted.
Schedule 1 – Operations: Inclusion of Table S1.4 (Pre-operational measures for future development) into the permit.	As referred to elsewhere in this document (for example, please see section 'waste treatment' above), with regards to the crushing of oil filters, the recommencement of this activity is subject to the conditions of pre-operational condition 1 (PO1), which is present within Table S1.4.
Schedule 2 – Waste types, raw materials and fuels.	Schedule 2 (Waste types, raw materials and fuels) have been altered in the following ways: • A separate waste list has been created to accurately represent the treatment of oil filters. This is now Table S2.2 Permitted waste types and quantities for treatment of hazardous waste (oil filters) (AR7). The waste types within this permit are already present within the current permit. • Table S2.2 within the current permit represents the hazardous waste types for storage. This has been updated in the revised permit to represents the hazardous waste types for storage (AR1 and AR6) and repackaging (AR2) and this is now Table S2.4. No waste types have been removed or added as a result of this process. • Table S2.3 'Permitted waste types and quantities of non-hazardous waste for repackaging and storage' in the current permit is now Table S2.5 'Permitted waste types and quantities of non-hazardous waste for repackaging (AR9), physical treatment, manual sorting and segregation (AR10) and storage (AR11)'. No waste types have been removed or added as a result of this process. • A new waste table has been added (Table S2.3) for the treatment/decanting of 11 01 13*. Within the Operator's Regulation 61 response a list of wastes was provided, which included the following two EWC codes: • 20 01 35* discarded electrical and electronic equipment other than those mentioned in 20 01 21, 20 01 23 containing hazardous components; and • 20 01 36 discarded electrical equipment other than those mentioned in 20 01 21, 20 01 23, and 20 01 35.

	These two wastes are not present within their current permit. Examining a previous application Pure Clean Waste Solutions submitted in 2019, advice was offered at the time that adding these codes was not within the scope of the administrative variation being determined at that time and therefore they were excluded from the determination. A request for information was issued (dated 26/07/2024) stating this and asked the Operator to confirm and describe the type of WEEE waste being accepted under these waste codes. The Operator responded on 09/08/2024 by stating that they would no longer accept these waste codes at the site.
Schedule 3 – Emissions and monitoring.	Schedule 3 (Emissions and monitoring) has been altered in the following ways: • Table S3.1 'Point source emissions to air – emission limits and monitoring requirements' has been updated to accurately represent the bulk storage tanks on site (W01, W02, W03 and WS1) and that the location of the emission points along with the abatement system are subject to a suite of improvement conditions. The solvent decanting process via the dumpster has also been added to this Table and is subject to a suite of improvement conditions. • Table S3.2 'Point source emissions to sewer, effluent treatment plant or other transfers off-site – emission limits and monitoring requirements' has been updated to include the parameter of 'oil and grease'. • Table S3.3 'Process monitoring requirements' has been added to the revised permit. The relevant emission points have been added along with reference to their location being determined through IC6, IC8 and IC10. IC8 (Abatement system), that requires the Operator subject to Environment Agency approval, to submit a plan for the installation, maintenance and operation of an abatement system to prevent or minimise emissions of VOCs and odour in accordance with chemical waste: appropriate measures for permitted facilities section 6.1. The abatement plan is incorporated into Table S3.3 'Process monitoring requirements'.
Schedule 4 – Reporting	Schedule 4 (Reporting) has been altered in the following ways: • Table S4.1 'Reporting of monitoring data' has been added to the permit to reflect the reporting requirements for Tables S3.1, S3.2, and S3.3. • Table S4.2 'Annual production/treatment' has been added to the permit to present the permitted activities in accordance with the current permit template. • Table S4.4 'Reporting forms' has been amended to present the permitted activities in

	accordance with the current permit template.
Schedule 7 – Site plan	Schedule 7 ‘Site plan’ has been altered in the following ways: • The ‘site location and permit boundary’ has been updated to reflect the current situation at the site. A ‘storage locations’ plan has also been added to the permit to reflect waste storage locations on site.

Decision Considerations

Confidential information

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

Identifying confidential information

We have not identified information provided as part of the Regulation 61 notice response that we consider to be confidential.

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

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’.

Following a review of the activities on site, Table S1.1 (activities) has been updated to present the permitted activities in accordance with the current permit template.

The site

The operator has provided a plan which we consider to be satisfactory. The plan is included in the permit. However, an improvement condition (IC8) has been inserted to ask for an updated site layout an emission points plan to ensure all necessary information is included, including ‘date, a north arrow, and a reference and drawn to a defined scale’.

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

Updating permit conditions during consolidation

We have updated permit conditions to those in the current generic permit template as part of permit consolidation. The conditions will provide the same level of protection as those in the previous permit.

Changes to the permit conditions

We have varied the permit as stated in the variation notice.

Management plans

We did not review any management plan under the scope of the permit review. Under the conditions of the permit, where we consider that activities are giving rise to pollution in the form of fugitive emissions, we will ask for the submission and implementation of a suitable management plan.

Improvement programme

We have included an improvement programme to ensure that the permit complies with the appropriate technical guidance for this facility.

Within the current permit there are two ICs (IC1 and IC2) that are marked as ‘complete’. IC1 refers to the requirement to submit a revised Environmental Management System and IC2 refers to the requirement to submit an infrastructure improvement plan. As they have been completed, they have been removed from the permit.

Based on the information in the Operator’s Regulation 61 notice response, and our own records of the capability and performance of the installation at this site, we consider that we need to set improvement conditions so that the outcome of the techniques detailed in the Waste Treatment BAT Conclusions and Chemical Wastes: appropriate measures for permitted sites are achieved by the installation. These improvement conditions are included in Table S1.3 of the permit and are summarised below. The reasons for their inclusion are explained in more detail in Table 1 above.

IC3 – management system – requires the Operator to review and update their written management system to ensure that they meet the requirements of the Environment Agency’s guidance Chemical waste: appropriate measures for permitted facilities (specifically related to a site condition report and contingency plan and procedures appropriate measures – appropriate measures 2.1.1., 2.5.1., 2.5.2., 2.5.3., 2.5.4., 2.5.5., 2.5.6., 2.5.7., 2.5.8., 2.5.9.) (The following equivalent non-hazardous and inert waste: appropriate measures for permitted facilities also apply – appropriate measures 2.4.1., 2.4.2., 2.4.3., 2.4.4., 2.4.5., 2.4.6., 2.4.7., 2.4.8., 2,4,9.).

IC4 – waste acceptance procedures – requires the Operator to review and update their waste acceptance procedures to ensure that they meet the requirements of the Environment Agency’s guidance Chemical waste: appropriate measures for permitted facilities (specifically related to acceptance sampling appropriate measures 3.2.27. to 3.2.39).

IC5 – waste storage, segregation and handling procedures – requires the Operator to review and update their waste storage, segregation and handling procedures to ensure that they meet the requirements of the Environment Agency's guidance Chemical waste: appropriate measures for permitted facilities (specifically related to hazardous waste signage appropriate measure 4.5, storage of waste under cover appropriate measure 4.9, aerosol storage appropriate measures 4.71. – 4.77.).

IC6 – emission control procedures – requires the Operator to review and update their emissions control procedures to ensure that they meet the requirements of the Environment Agency's guidance Chemical waste: appropriate measures for permitted facilities (specifically with reference to the storage of hazardous waste oils and solvents including the decanting and storage of waste odourless kerosene (AR1) and storage of non-hazardous liquid waste (AR10) – related to waste storage, segregation and handling appropriate measure 4.43., point source emissions to air appropriate measure 6.1.1., fugitive emissions to air (including odour) 6.2.2.) (The following equivalent non-hazardous and inert waste: appropriate measures for permitted facilities also apply – appropriate measures point source emissions to air (channelled emissions) 6.2.1.)

IC7a – updated emissions inventory and H1 (air) – requires the Operator to submit a written report to the Environment Agency for approval that proposes a monitoring programme to characterise and assess the facility's point source emissions to air in accordance with the emissions monitoring and limits specified in the Environment Agency's guidance Chemical waste: appropriate measures for permitted facilities and Non-hazardous and inert waste: appropriate measures for permitting facilities using the Environment Agency's 'H1 Environmental Risk Assessment' tool (or equivalent as agreed with the Environment Agency).

IC7b – H1 risk assessment – requires the Operator to submit a written report to include the results and conclusions of the emissions monitoring and assessment undertaken in accordance with the approved monitoring programme under condition IC5a.

IC8a – abatement system – requires the Operator to submit a plan to the Environment Agency for approval for the enclosure, extraction, installation, maintenance and operation of an abatement system, to meet the requirements of the Environment Agency's guidance Chemical waste: appropriate measures for permitted facilities (specifically related to emissions control appropriate measures point source emissions to air 6.1.1. and 6.1.4.)

IC8b – abatement system – requires the Operator to install and operate the abatement system (approved under IC6a) in accordance with the Environment Agency's written removal.

IC9 – site condition report – requires the Operator to undertake a review of the Site Condition Report to ensure Article 22 of the Industrial Emissions Directive is complied with.

IC10 – site layout and emission points plan – requires the Operator to submit a site layout and emissions point plan to the Environment Agency for approval.

Pre-operational measures for future development

Recommencement of the crushing of oil filters:

Prior to the recommencement of activity AR7 authorised by Table S1.1, including any waste acceptance, storage and treatment which are in temporary cessation under this variation notice, the Operator shall apply to the Environment Agency to vary the permit and provide supporting documents in accordance with the requirements of the Waste Treatment BAT conclusions and Chemical Waste: appropriate measures for permitted sites and other appropriate measures guidance as applicable.

Changes to EWC codes

No new EWC codes have been added to the permit as a result of the permit review. All of the waste codes accepted by the Operator are deemed either suitable for the treatment or storage at a waste oil treatment and storage site or the other services the Installation offers.

Emission limits

No emission limits have been added, amended or deleted as a result of this variation. However, IC7b (details above) has been included, which may result in emission limits being added to the permit in future.

For rainfall runoff from non-process areas of waste storage/treatment (e.g. roofs and carparks) we have included descriptive limits on visible oil and grease.

Monitoring

We have decided that monitoring should not be included at this stage for emissions to air, as there are currently no parameters set. However, IC7b (details above) has been included, which may result in monitoring being added to the permit in future.

For uncontaminated site surface water from roofs and non-operational areas, which discharge to sewer, we have added the requirement for a daily visual assessment of the presence of oil or grease.

Reporting

We have added reporting in the permit for added for all parameters listed in the section above. We made these decisions in accordance with Best Available Techniques for Waste Treatment.

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 100 of that Act in deciding whether to grant the variation of 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 standard.