

Permitting Decisions - Environment Agency Initiated Variation

We have issued an Environment Agency initiated variation for Great Yarmouth Technical Waste Management Centre, operated by ASCO UK LIMITED following a review of the permit in accordance with Environmental Permitting (England and Wales) Regulations 2016, regulation 34(1).

The variation number is EPR/GP3630YS/V002.

The permit variation was issued on 29/09/2025.

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: <https://www.gov.uk/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 \(WEEE\): appropriate measures for permitted facilities - Guidance - GOV.UK](#) and the relevant requirements of the [BAT Conclusions for Waste Treatment](#) which have been incorporated into our guidance 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.

- Healthcare waste: appropriate measures for permitted facilities - published 13 July 2020.
- Non-hazardous and inert waste: appropriate measures for permitted facilities - published 12 July 2021.
- Treating Metal Waste in Shredders: appropriate measures for permitted facilities – published October 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 17/11/2021 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;
- Confirms if they intend to cease operating any activity which would be in breach of the relevant new BAT Conclusion (BATC) after the compliance date, and the date by which they intend to cease operation;
- Confirms where there is a BAT-Associated Emission Level (BAT-AEL) specified in the BAT conclusion, with which they will not comply with by the compliance date and they wish to continue operating, they should request a derogation.

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 or 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.

Regulation 61 Response

The Regulation 61 notice response from the Operator was received on 01/12/2021.

We considered that the response did not contain sufficient information for us to commence determination of the permit review. We therefore issued a further information request to the operator. Suitable further information was provided by the operator on 03/10/2023.

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 (summary of information) on 11/04/2025 and 07/05/2025. 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	<p>The operator confirmed that they currently meet the requirements of the appropriate measures in this section except for all appropriate measures within sections 2.6 which requires the operator to have a written management system that incorporates consideration for decommissioning the plant. Considering that the facility also accepts WEEE, consideration of the Waste electrical and electronic equipment (WEEE): appropriate measures for permitted facilities have also been included. Improvement condition IC2 has been included in the varied permit to address this.</p> <p>Compliance with the other 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.</p>
Waste pre-acceptance, acceptance and tracking appropriate measures	FC	<p>The operator confirmed that they currently meet the requirements of the appropriate measures in this section. The operator stated that all onshore waste is pre-accepted except the offshore waste, stating that no pre-acceptance is currently completed for offshore waste because a waste manifest is received at the quayside when boat lands. Considering that the facility also accepts WEEE, consideration of the Waste electrical and electronic equipment (WEEE): appropriate measures for permitted facilities have also been included. Improvement condition IC3 has been included in the varied permit to address this.</p> <p>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.</p>

Waste storage, segregation and handling appropriate measures	CC	<p>The operator has stated in their Regulation 61 Notice that they are compliant with Section 4 of the Appropriate Measures.</p> <p>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.</p>
Waste treatment appropriate measures	CC	<p>The Operator has provided up to date information on their treatment process. They also provided details in the way of process flows and protocols in the RFI response sent to the Environment Agency as part of this sector review of the permit on 11/04/2025.</p> <p>The Operator confirmed compliance with this section of the Appropriate Measures in their Regulation 61 Notice response.</p>
Emissions control appropriate measures	FC	<p>The operator has stated in their Regulation 61 Notice that they are compliant with Section 6 of the Appropriate Measures and confirmed the presence of point source emission to air on the oil storage tanks with abatement in place to control emissions which were not in the previous permit. As a result of this review, we have identified 8-point source emission to air which has been included in the varied permit.</p> <p>improvement condition IC4a, IC4b, and IC5a and IC5b, requiring the operator to carry out assessments on the risk of diffuse emissions to air from emission points A1 (Tank 1), A2 (Tank 2), A3 (Tank 3), A4 (Tank 4), A5 (tote tanks storage and cleaning area), A6 (Processing area for Hazardous waste), A7 (Drum washing and crushing area) and A8 (blue tent Hazardous processing area) and emissions control measures or an equivalent technique are implemented, has been included in the varied permit. This improvement condition includes a requirement to review their emissions control against the following:</p> <p>Chemical waste appropriate measures:</p>

		<ul style="list-style-type: none"> • Section 6.1 Point source emissions to air. • Section 6.2 Fugitive emissions to air. <p>Non-hazardous and inert waste appropriate measures:</p> <ul style="list-style-type: none"> • Section 6.1 Point source emissions to air. • Section 6.2 Fugitive emissions to air. <p>Healthcare appropriate measures:</p> <ul style="list-style-type: none"> • All measures within Point source emissions to air. • All measures within Fugitive emissions to air. <p>Waste electrical and electronic equipment (WEEE) appropriate measures:</p> <ul style="list-style-type: none"> • All measures within Section 6.1 Point source emissions to air. • All measures within Section 6.2 Fugitive emissions to air. <p>Compliance with the other 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.</p>
Emissions monitoring and limits appropriate measures	FC	<p>The operator stated that they do not have any point source emission air monitored. However, point source emissions to air were identified during the review of the facility. Relevant monitoring and reporting requirements have been inserted into the varied permit.</p> <p>While the operator does not currently carry out reporting of their emissions to air, due to the conditions in their previous permit, we have no reason to believe that the operator cannot comply with the requirements inserted into their varied permit and</p>

		<p>once improvement condition IC4a and IC4b has been completed.</p> <p>We have therefore included an improvement condition IC5a and IC5b that requires that monitoring of emissions to air from emission points referenced Vents from A1 (Tank 1), A2 (Tank 2), A3 (Tank 3), A4 (Tank 4), A5 (tote tanks storage and cleaning area), A6 (Processing area for Hazardous waste), A7 (Drum washing and crushing area) and A8 (blue tent Hazardous processing area) are implemented.</p>
Process efficiency appropriate measures	CC	<p>The operator confirmed that they currently meet the requirements of all appropriate measures in this section and has confirmed that they are able to comply with all appropriate items in the Appropriate Measures for process efficiency.</p> <p>Additional reporting has been added to the permit in Schedule 4 to capture the site's process efficiency.</p> <p>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.</p>
Reg 61 requirement	Assessment of response received	
Soil and groundwater risk assessment	<p>The operator has not included a site condition report in their submission. This was not required as part of the application as it was out of the scope of the permit review. The operator is required to submit 5 and 10 yearly monitoring of groundwater and soil contamination as per the conditions in the permit.</p>	
Medium combustion plant and specified generators	<p>No existing medium combustion plant or specified generators are present at this facility.</p>	
Climate change	<p>Submission of climate change risk assessment is no longer application requirement. It now forms a</p>	

	part of the operator's EMS and will be reviewed within compliance assessment.
Summary of other changes made to the permit as a result of our assessment of the Reg 61 response	
Change to Activities Table S1.1	<p>The Activities present in Table S1.1 of the permit have all been updated to reflect the requirements of the Appropriate Measures and a level of detail required to ensure adequate management of risk each of the Activities pose from the Installation and waste operation. There are multiple changes to Table S1.1 Permitted Activities as a result of the review.</p> <ul style="list-style-type: none"> • Updates include additional detail in the limits of each Activity to list treatment and storage vessels, their capacities and where appropriate their composition. • Waste quantities and limits to each storage/treatment Activity have been added where possible to reflect procedures and capacities at the Installation. • The container washing in the directly associated activity from the previous permit has been listed as an aggregated 5.3 activity with the limit of specified activity described. • Physico-chemical treatment of oil and water mixtures by gravity separation in an enclosed double IBC stand has been listed as an aggregated 5.3 activity with the limit of specified activity described. • Surface water collection and storage have been listed as a directly associated activity AR6 • Repackaging of non-hazardous lab smalls sorted from hazardous waste from the DAA in the previous permit has been incorporated into the waste operation AR7 in the limit of specified activity. • The lamp crushing activity has been removed from the listed activities as the operator has confirmed that the activity is no longer completed on site and all tubes are currently being sent out to a recycling company off-site. • The operator has confirmed that the wire stripping activity is no longer completed on site, and all wire cables are sent to scrap merchant off-site. Therefore, we have removed this activity from the list of activities in table S1.1.
Change to Operating	The Operating Techniques for the site have been amended in line with the Installation confirming

Techniques Table S1.2	compliance with the Chemical waste: appropriate measures for permitted facilities Version published 18 November 2020.
Changes to Table S1.3	New Improvement Conditions has now been added to the permit.
Change to Schedule 2 Table for EWC Codes accepted at site	Specific waste code description has been added for EWC 19 12 11* and 19 12 12.
Changes to Schedule 3 Table S3.1 Emissions to Air	<p>Point source emissions to air have been added as a result of this review and emission limits and monitoring requirements have been included for the storage tank vents to air and the tote storage and cleaning area with VOCs emission potential.</p> <p>The previous permit had no point source emission identified.</p> <p>The following are now in place:</p> <ul style="list-style-type: none"> • A1 - Storage tank 1 vent - No parameter and limit set • A2 - Storage tank 2 vent - No parameter and limit set • A3 - Storage tank 3 vent - No parameter and limit set • A4 - Storage tank 4 vent - No parameter and limit set • A5 - tote tanks storage and cleaning area - LEV - No parameter and limit set • A6 - Processing area for Hazardous waste - LEV - No parameter and limit set • A7 - Drum washing and crushing area - LEV - No parameter and limit set • A8 - Blue tent Hazardous processing area - LEV - No parameter and limit set <p>The Table also has some alterations to the footnotes and additional parameter conditions present regarding the requirements for monitoring.</p>
Removal of Point source emission to Water and	Discharge of uncontaminated water to sewer.

Sewer (formerly Table S3.1 and S3.2 in the existing permit)	Emission Point S1 now has now been removed from the permit as there as there are no longer emissions to sewer and river. All liquid discharges are removed from site by tanker.
Addition of Table S3.2	Table S3.2 Process monitoring requirements has now been added to the permit, in line with the requirements of BAT and the Appropriate Measures.
Addition of Table S4.1	Reporting of monitoring data has now been added to the permit in Table S4.1 for emissions to air and process monitoring parameters, in line with the requirements of BAT and the Appropriate Measures.
Changes to Table S4.2	Annual production/treatment reporting has now been added in Table S4.2, in line with the requirements of BAT and the Appropriate Measures.
Changes to Table S4.3	Performance parameters for water usage, energy usage and total raw material used has now been added in Table S4.3, in line with the requirements of BAT and the Appropriate Measures.
Changes to Table S4.4	Reporting forms has now been added for air emissions, water usage and energy usage, in line with the requirements of BAT and the Appropriate Measures.

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.

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', and Appendix 1 of RGN 2 'Interpretation of Schedule 1'.

The site

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

These show the extent of the site of the facility including the emission points.

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

The plans are included in the permit.

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.

Changes to the permit conditions

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

Improvement programme

We have included an improvement programme to ensure that the permit complies with the appropriate technical guidance for this facility, Chemical waste:

appropriate measures for permitted facilities. Details of these can be found in Table 1.

Changes to EWC codes

We have amended the description of the following EWC codes:

- 19 12 11* other wastes (including mixtures of materials) from mechanical treatment of waste containing hazardous substances (Mixed fuels)
- 19 12 12 other wastes (including mixtures of materials) from mechanical treatment of wastes other than those mentioned in 19 12 11 (Aqueous incineration wastes)

This decision was taken to provide clarity on the wastes accepted under this EWC code.

No other waste types have been removed or amended in the varied permit.

Emission limits

No emission limits have been added, amended or deleted as a result of this variation.

Monitoring

We have decided that monitoring should be added for the oil storage tanks abatements using the methods detailed and to the frequencies specified in table S3.4 based on efficiency assessment.

These monitoring requirements have been included in order to comply with Chemical waste: appropriate measures for permitted facilities.

We made these decisions in accordance with Waste Treatment BAT Conclusions, Chemical Waste: Appropriate Measures for Permitted Facilities.

Reporting

We have added reporting in the permit for the following parameters:

- point source emissions specified in tables S3.1.
- process monitoring specified in table S3.4.

We made these decisions in accordance with Waste Treatment BAT Conclusions, Chemical Waste: Appropriate Measures for Permitted Facilities

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 standards.