

Permitting Decisions- Environment Agency Initiated Variation

We have issued an Environment Agency initiated variation for Stourport Oil Treatment Plant operated by Slicker Recycling 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/GP3030EA/V008.

The permit variation was issued on 07/10/2025.

We consider in reaching this decision we have taken into account all relevant considerations and legal requirements and that the permit will ensure that the appropriate level of environmental protection is provided.

Permit Review

This Environment Agency has a duty, under the Environmental Permitting (England and Wales) Regulations 2016 (EPR), regulation 34(1), to periodically review permits.

Article 21(3) of the Industrial Emissions Directive (IED) also requires the Environment Agency to review conditions in permits to ensure that they deliver compliance with relevant standards, within four years of the publication of updated decisions on Best Available Techniques (BAT) Conclusions.

We have reviewed the permit for this 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 - Guidance - GOV.UK](#) 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.
- [Non-hazardous and inert waste: 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.

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 18/11/2021 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 30/04/2022.

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 21/03/2025, 12/05/2025 and 05/06/2025. We made a copy of this information available on our public register.

Summary of our assessment of the operator's Reg 61 response and our actions - Temporary cessation.

The activity AR1 which is subject to the Chemical Waste Appropriate Measures is non-operational. We consider this to be "temporary cessation." Activity AR1 in the permit cannot take place since we have not been given the information to show that it will meet the required technical standards. We have therefore added pre-operational condition POFD1 into the permit regarding the recommencement of activity AR1 listed in Table S1.1. The condition requires that, prior to recommencement of this activity, the operator shall confirm to the Environment Agency the intention to recommence operation and provide supporting documents for approval demonstrating activities are in accordance with the requirements of the Waste Treatment BAT Conclusions and Chemical Wastes; appropriate measures for permitted sites and other appropriate measures guidance as applicable. The activities permitted shall only recommence once written agreement has been provided by the Environment Agency.

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	CC	The operator confirmed that they currently meet the requirements of all appropriate measures in this section. 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	CC	The operator confirmed that they currently meet the requirements of all appropriate measures in this section. 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	CC	<p>The Operator confirmed that they meet the appropriate measures and state the following:</p> <ul style="list-style-type: none"> • 4.35. Racking Storage – The site does not use racking to store wastes. • 4.68. Powder transfers to silos – The site does not handle or convey powders in bulk. <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	The operator confirmed that they currently meet the requirements of all appropriate measures in this section. 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	<p>The Operator confirmed that they meet the appropriate measures and state the following:</p> <ul style="list-style-type: none"> • 6.5.8. Treatment and Reuse of Water – A detailed effluent treatment feasibility project was run in 2019, with deemed the onsite treatment and reuse of effluent to be uneconomical for the small volumes of water used on site versus the extremely high capital expenditure cost. Effluent is currently tankered off site and as such, Slicker Recycling believe they are compliant with this point of the guidance.

		<p>During the determination of the permit, we identified that the emission control measures on site did not meet the appropriate standards. Specifically, the operation was not compliant with Appropriate Measure 6.1.1, which states: "You must contain storage tanks, silos, and waste treatment plant (including shredders) to ensure that all process emissions are collected, extracted, and directed to an appropriate abatement system for treatment before release."</p> <p>The operator has not provided sufficient evidence to demonstrate that an emissions control measure—or an equivalent technique—is not required for their bulk storage tank vents onsite, based on the risks posed.</p> <p>As a result, we have included Improvement Condition IC1a and 1b, which requires the operator to control the diffuse emissions to air from associated with bulk storage tank vents on site. This condition requires the enclosure, extraction, collection, installation, maintenance, and operation of an abatement system to reduce volatile organic compounds (VOCs) emitted from the bulk storage tanks.</p>
Emissions monitoring and limits appropriate measures	CC	The operator confirmed that they currently meet the requirements of all appropriate measures in this section. 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	<p>The Operator has confirmed that they are able to comply with all appropriate items in the Appropriate Measures for 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	The operator has included a site condition report in their submission. This was not assessed 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.	
Medium combustion plant and specified generators	The facility includes an existing Medium Combustion Plant (MCP), comprising a gas oil-fired steam boiler with a thermal input of 3.7 MWth and an additional boiler rated at 2.5 MWth. The permit has been reviewed against the requirements of the Medium Combustion Plant Directive for 2025 and 2030 and relevant conditions and monitoring	

	requirements have been added
Climate change	Submission of climate change risk assessment is no longer application requirement. It now forms a part of the operator's EMS and will be reviewed within compliance assessment.
Non-hazardous and inert waste appropriate measures	<p>The operator confirmed that they comply with the appropriate measure.</p> <p>Compliance with the appropriate measures of the guidance has been incorporated into the varied permit through the updated operating techniques listed in Table S1.2.</p>
Waste electrical and electronic equipment (WEEE) appropriate measures	<p>The Operator has stated the following in their Regulation 61 response:</p> <ul style="list-style-type: none"> We comply with these requirements under appropriate measures <p>Compliance with the appropriate measures of the guidance has been incorporated into the varied permit through the updated operating techniques listed in Table S1.2.</p>
Summary of other changes made to the permit as a result of our assessment of the Reg 61 response	
Change	Reason for change
Tanker barrels washing	Tanker barrels are being cleaned out after emptying at the Stourport site. This activity is not referenced on the current permit. A Directly Associated Activity (DAA) has been added to Table S1.1 for washing of tanker barrels associated with the facility and waste deliveries, activity reference AR3. Fugitive emissions shall be minimised during tanker barrels washing.
Improvement conditions	Improvement conditions reference IC1a and b have been added to the permit to ensure that the permit meets the requirements of the Environment Agency's guidance, Chemical waste: appropriate measures for permitted facilities
Mothballed activities	Activity AR1, listed in Table S1.1, is currently in temporary cessation and has been made subject to a pre-operational measure for future development, referenced as POFD1 in Table S1.4.

Change to Operating Techniques	The Operating Techniques for the site have been amended in line with the Operator confirming compliance for their Installation with the Appropriate Measures Guidance (as mentioned earlier in this Decision Document); the updates to the site procedures and management systems will automatically supersede items provided in first Application and subsequent variations where the Guidance has changed and site procedures updated to reflect practice on site.
Change to EWC codes	<p>Inclusion of five additional hazardous EWC codes into the permit to allow the facility to accept similar wastes already permitted and to allow the operator to deregistering of the existing S2 exemption. Waste codes 14 06 02*(other halogenated solvents and solvent mixtures), 19 12 06* (wood containing hazardous substances), 20 01 23*(discarded equipment containing chlorofluorocarbons), 20 01 33*(batteries and accumulators included in 16 06 01, 16 06 02 or 16 06 03 and unsorted batteries and accumulators containing these batteries) and 20 01 35* (discarded electrical and electronic equipment other than those mentioned in 20 01 21 and 20 01 23 containing hazardous components) have been added to Schedule 2, Table S2.3.</p> <p>Inclusion of an additional non-hazardous EWC code into the permit to allow deregistering of the existing S2 exemption. Waste codes 16 01 03 (end-of-life tyres), 16 01 19 (plastic), 16 02 16 (components removed from discarded equipment other than those mentioned in 16 02 15), 20 01 28 (paint, inks, adhesives and resins other than those mentioned in 20 01 27), 20 01 34 (batteries and accumulators other than those mentioned in 20 01 33) and 20 01 39 (plastics) have been added to Schedule 2, Table S2.4.</p> <p>The inclusion of these wastes will not change the accepted annual throughput of wastes at the facility, or the amount of waste stored on site at any one time.</p> <p>Waste code 19 12 11* has been restricted in Table S2.3 to active airbags and end of life vehicle fuel tanks. And waste code 19 12 12 has been restricted in Table 2.4 to deactivated air bags and purged end of life vehicle fuel tanks. These limitations are based on information provided by the operator regarding the specific nature of the waste received under each code.</p>
Point source emissions air.	Schedule 3, Table S3.1 has been updated to include BAT-associated emission levels (BAT-AELs) for emissions to air from the chemical wet scrubber abatement system (AR1), arising from the physico-chemical treatment of waste with calorific value. These BAT-AELs will become applicable upon the recommencement of Activity AR1, which is currently in temporary cessation.
Point source emissions to sewer.	<p>Discharge of uncontaminated water to sewer.</p> <p>Emission Point S1, listed in Schedule 3, Table S3.2, now includes a requirement to monitor for visible oil and grease. In accordance with BAT requirements, the discharge limit is set at "none present" prior to release to sewer.</p>

Process monitoring requirements.	Process monitoring requirements, Table S3.3 has been amended in the permit to facility monitoring and efficiency assessments of abatement filters.
Site plan.	Site plan. The site infrastructure plan has been updated in Schedule 7.

Decision Considerations

Confidential information

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

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

Identifying confidential information

We have not identified information provided as part of the 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'.

The site

The operator has provided a plan which we consider to be satisfactory.

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

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

The plan is included in the permit.

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.

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 Chemical waste: appropriate measures for permitted facilities. See Table 1.

Changes to EWC codes

The following waste codes have been added to the permit at the request of the operator to enable them to de-register S2 exemption:

14 06 02*	other halogenated solvents and solvent mixtures
19 12 06*	wood containing hazardous substances
20 01 23*	discarded equipment containing chlorofluorocarbons
20 01 33*	batteries and accumulators included in 16 06 01, 16 06 02 or 16 06 03 and unsorted batteries and accumulators containing these batteries
20 01 35*	discarded electrical and electronic equipment other than those mentioned in 20 01 21 and 20 01 23 containing hazardous components
16 01 03	end-of-life tyres
16 01 19	plastic
16 02 16	components removed from discarded equipment other than those mentioned in 16 02 15
20 01 28	paint, inks, adhesives and resins other than those mentioned in 20 01 27
20 01 34	batteries and accumulators other than those mentioned in 20 01 33
20 01 39	plastics

Restrictions have been applied to the types of waste accepted under the following waste codes. These limitations are based on information provided by the operator regarding the specific nature of the waste received under each code.

19 12 11*	other wastes (waste limited to active airbags and end of life vehicle fuel tanks)
19 12 12	other wastes (waste limited to deactivated air bags and purged end of life vehicle fuel tanks)

Emission limits

Emission Limit Values (ELV's), based on Best Available Techniques – Associated Emission Levels (BAT-AELS) for Waste Treatment, have been added or amended for the following substances:

Emissions to air (A1, A11, A13, A22, A25, and A39) arising from physico-chemical treatment of waste with calorific value.

- Total Volatile Organic Compounds (TVOCs), 30 mg/m³

Emissions to air (A44 and A45) arising from existing MCP

- Oxides of Nitrogen (NO₂), 200 mg/m³

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

Monitoring

We have decided that monitoring for emissions to air should be added for the following parameters, using the methods detailed and to the frequencies specified:

- Total Volatile Organic Compounds (TVOCs)
- Speciated Volatile Organic Compounds
- Oxides of Nitrogen (NO₂)
- Carbon Monoxide (CO)

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

Reporting

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

- Emissions to air, every 6 months.
- Emissions to air (MCP), every 3 years from date of acceptance of first monitoring measurements under condition 3.5.5.
- Emissions to sewer, annually.

- Process monitoring, annually.

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.