

Permitting Decisions- Variation

We have decided to grant the variation for Merton Farm, operated by Synergy Asset Services Limited.

The variation number is EPR/FB3602HU/V002.

The permit was issued on 19/12/2025.

The variation is for the addition of storage and treatment of hazardous waste gas canisters. There is also an increase in the storage and treatment of non-hazardous waste canisters and aerosols.

The operator does not propose any changes to the treatment methodology for non-hazardous canisters and aerosols. Accordingly, this aspect is outside the scope of the present variation.

There is also an addition of a new non-hazardous waste code for End-of-life tyres which are stored for offsite transfer only.

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

Purpose of this document

This decision document provides a record of the decision-making process. It

- highlights key issues in the determination
- summarises the decision making process in the decision considerations section to show how the main relevant factors have been taken into account
- shows how we have considered the consultation responses

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

Read the permitting decisions in conjunction with the environmental permit and the variation notice.

Key issues of the decision

Emissions to Air

To prevent any release of emissions to air during the treatment of hazardous waste canisters and aerosols, the operator will utilize purpose-designed equipment. The bespoke treatment plant is engineered to fully capture all gases and residual contents generated during treatment process. Each canister is treated individually and degassed within a sealed system to ensure that the contents are captured and contained. As such there are no emissions to air from the treatment process.

Drainage

There are no discharges to sewer, surface water, or groundwater from the site. All waste canisters and aerosols are stored under cover and on impermeable surfaces. Runoff from the storage areas is directed to the rear of the impermeable surface and collected in holding sumps. The collected water is removed from site by IBC or tanks and transferred to an appropriately licensed waste management facility.

Within the treatment area, any water generated is directed into an interceptor tank with a capacity of 1,500 litres. This tank is designed to capture all potentially contaminated liquids, including fire suppressant residues, rinse water, and incidental discharges. When the interceptor tank nears capacity, its contents are transferred into an Intermediate Bulk Container (IBC), which is stored within a bunded area prior to removal from site by IBC or tank for appropriate disposal.

Storage of Canisters and aerosols

All canisters and aerosols are stored under cover to prevent exposure to direct sunlight and to eliminate the risk of water ingress. Storage is provided in metal cages that ensure adequate ventilation and are constructed to be anti-spark. The cages are further designed to provide secure containment, thereby preventing canisters from being propelled as projectiles in the event of a fire.

Synergy have also undertaken DSEAR assessment which identifies and evaluates the risks from canisters and aerosols, such as flammable gases, vapours, dusts, and liquids, that could cause fires or explosion. It includes classification of hazards and controls.

Storage of End-of-Life Tyres for Transfer

End-of-life tyres are sealed in a roro skip preventing any runoff to ground. Storage at any one time is limited to 25 tonnes and the annual throughput is limited to 200 tonnes. There are adequate water supplies to support effective fire suppression operations and to ensure that any outbreak is safely extinguished.

Decision considerations

Confidential information

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

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

Identifying confidential information

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

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

Consultation

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

The application was publicised on the GOV.UK website.

We consulted the following organisations:

Local Authority – Environmental Health/Environmental Protection department

Health and Safety Executive

UK Health Security Agency

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

The regulated facility

We considered the extent and nature of the facilities 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 extent of the facilities is defined in the site plan and in the permit. The activities are defined in table S1.1 of the permit.

The site

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

These show the extent of the site of the facility.

The plan is included in the permit.

Site condition report

The operator has provided a description of the condition of the site, which we consider is satisfactory. The decision was taken in accordance with our guidance on site condition reports and baseline reporting under the Industrial Emissions Directive.

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

We have checked the location of the application to assess if it is within the screening distances we consider relevant for impacts on nature conservation, landscape, heritage and protected species and habitat designations. The application is not within our screening distances for these designations.

Environmental risk

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

The operator's risk assessment is satisfactory.

General operating techniques

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

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

The operating techniques are in line with the following: Waste Treatment BAT Conclusions, and Chemical waste: appropriate measures for permitted facilities - Guidance - GOV.UK.

Fire prevention plan

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

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

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

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.

Waste types

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

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

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

We made these decisions with respect to waste types in accordance with the WM3 guidance.

Pre-operational conditions

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

The operator is required to ensure that all waste gas canisters and aerosols are stored on impermeable surfaces with sealed drainage. The operator stated that Areas 2 and 3 highlighted on drawing referenced '018.1_09_011 Pre Op

Construction REV A', are not fully constructed. We have therefore added a pre-operational condition (reference P01) in table S1.3 of the permit to ensure that no waste is stored in these areas until the pre-operational condition is approved by the Environment Agency.

Emission limits

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

Reporting

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

- Hazardous waste - Canisters/Aerosols treated
- Non-hazardous waste treated
- Non-ferrous metal recovered
- Ferrous metal recovered
- Other fractions recovered
- Annual Water Usage
- Annual Energy Usage
- Annual Total raw materials used

We made these decisions in accordance with reference the relevant technical guidance.

Management system

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

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

Technical competence

Technical competence is required for activities permitted.

The operator is a member of the CIWM/WAMITAB scheme

We are satisfied that the operator is technically competent.

Previous performance

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

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

Financial competence

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

Growth duty

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

Paragraph 1.3 of the guidance says:

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

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

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

Consultation Responses

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

Responses from organisations listed in the consultation section

Response received from the UKHSA.

Brief summary of issues raised: The main emissions of potential concern are fugitive emissions to air and channelled emissions to air from treatment of canisters and aerosols. In addition, it is recommended that the Environment Agency ensure that there are no fugitive emissions to water. UKHSA also ask that the Environment Agency to consider accidents relating to adverse weather conditions and the impact of storing end of life tyres on site.

Summary of actions taken: All of the issues and areas of concern in the UKHSA response have been addressed within the Key Issues section above.

Response Received from the Local Planning Authority.

Brief summary of issues raised: Consider the possibility of additional surface water runoff including from dust suppression.

Summary of actions taken: The issue relating to runoff has been addressed within the Key Issues section above.