

Permitting Decisions - Environment Agency Initiated Variation

We have issued an Environment Agency initiated variation for CSG Worcester Treatment Plant operated by Cleansing Service Group 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/FP3532NV/V003.

The permit variation was issued on 18/02/2026.

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.

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 are 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.

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
- 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 07/04/2022.

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 28/11/2025. 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	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 the appropriate measures in this section other than Section 3.1.5. 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. The operator has suggested alternative measures for Section 3.1.5 which have been accepted and agreed as meeting equivalent level of environmental protection. This alternative measure only applies to interceptor wastes from garage forecourts and vehicle washdown areas.
Waste storage, segregation and handling appropriate measures	FC	The operator confirmed that they do not currently meet the requirements of all appropriate measures in this section. Improvement condition IC6 has been included in the varied permit to address this.
Waste treatment appropriate measures	FC	The operator confirmed that they do not currently meet the requirements of all appropriate measures in this section. Improvement condition IC7 has been included in the varied permit to address this.

Emissions control appropriate measures	FC	The operator confirmed that they do not currently meet the requirements of all appropriate measures in this section. Improvement conditions IC8, IC10, IC11 and IC12 have been included in the varied permit to address this.
Emissions monitoring and limits appropriate measures	FC	The operator confirmed that they do not currently meet the requirements of all appropriate measures in this section. Improvement conditions IC8, IC10, IC11 and IC12 have been included in the varied permit to address this.
Process efficiency appropriate measures	FC	The operator confirmed that they do not currently meet the requirements of all appropriate measures in this section. Improvement condition IC9 has been included in the varied permit to address this.
Reg 61 requirement Assessment of response received		
Soil and groundwater risk assessment	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.	
Medium combustion plant and specified generators	No existing medium combustion plant or specified generators are present at this facility.	
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.	
Summary of other changes made to the permit as a result of our assessment of the Reg 61 response		
Change	Reason for change	
Treatment of hazardous waste.	Activity reference AR1 has been separated to allow treatment of oily waste for recovery (AR1) and treatment of hazardous aqueous waste for disposal (AR2).	

Treatment of hazardous and non-hazardous waste containers.	Washing of packaging arising from hazardous waste storage and treatment operations is now an installations activity (AR3). Directly Associated Activities (DAAs) have been amended in Table S1.1 for washing of non-hazardous waste containers (AR8). Fugitive emissions shall be minimised during container washing.
Repackaging and blending or mixing activities.	The operator has confirmed the facility does not carry out a blending or mixing activity. The operator has confirmed the repackaging activity is bulking of treated waste oils (treated in activity reference A1) to dispatch for further reprocessing prior to use as a recovered fuel oil. Both these activities have been removed from the permit.
Storage of non-hazardous waste.	Non-hazardous waste is being stored prior to treatment. This activity is not referenced on the current permit. A Directly Associated Activity (DAA) has been added to Table S1.1 for the storage of non-hazardous waste prior to treatment only, activity reference AR6.
Raw material handling and storage.	Raw materials are being handled and stored on site prior to use in Activities AR2 or AR4. This activity is not referenced on the current permit. A Directly Associated Activity (DAA) has been added to Table S1.1 for raw material handling and storage, activity reference AR7.
Uncontaminated surface water collection and storage.	Uncontaminated surface water is being collection and stored at the facility. This activity is not referenced on the current permit. A Directly Associated Activity (DAA) has been added to Table S1.1 for the collection and storage of uncontaminated surface water, activity reference AR9.
Improvement conditions.	Improvement conditions reference IC1 to IC5 have been completed by the Operator and removed from the permit. Improvement conditions reference IC6 to IC13 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.
Pre-operational measures for future development.	Pre-operational measure, reference PO1 and PO2 has been completed by the Operator and removed from the permit.
Process aids for use in the treatment of hazardous waste.	Schedule 2, Table S2.2 has been updated to include process aids. They are currently present in Schedule 2, Tables S2.7 and S2.8 of the permit therefore no new EWC codes have been added to the permit as a result of the permit review.
Point source emissions to air.	Schedule 3, Table S3.1 has been updated to include BAT-associated emission levels (BAT-AELs) for emissions to air arising from the treatment of water-based liquid waste. Abatement system to be agreed upon completion of IC12. Until the completion and approval of IC12a emission points have not been assigned to allow the operator the flexibility of design of abatement system for the reduction of emissions to air from the storage and treatment tanks. Schedule 3, Table S3.1, emission point reference A1 has been updated to include parameters which have an Environment Standard. Emission Limit Values (ELVs) will require quantifying and assessment via completion of IC10 which requires an assessment of the facility's point source emissions to air.
Point source emissions to sewer.	Schedule 3, Table S3.2 has been updated to include BAT-associated emission levels (BAT-AELs) for indirect discharges to a receiving water body arising from the treatment of water-based liquid waste (S1).
Process monitoring requirements.	Process monitoring requirements, Table S3.3 has been added to the permit to facility efficiency assessments of abatement filters.
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', 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 discharge points.

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

A 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.

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 permits.

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 meets the requirements of the Environment Agency's guidance, Chemical waste: appropriate measures for permitted facilities.

Those Improvement Conditions added are referenced in Table 1 of this Decision Document. They have been included in the permit to address issues of non-compliance with the Chemical Waste Appropriate Measures.

Changes to EWC codes

The following hazardous waste codes have been amended on the permit in Schedule 2, Table S2.2 to be used as process aids in Activity AR2:

06 01 01*	sulphuric acid and sulphurous acid
06 01 02*	hydrochloric acid
06 02 04*	sodium and potassium hydroxide
08 03 16*	waste etching solutions
11 01 05*	pickling acids
16 03 03*	inorganic wastes containing hazardous substances
16 05 07*	discarded inorganic chemicals consisting of or containing hazardous substances
16 09 04*	oxidising substances, not otherwise specified
19 02 11*	other wastes containing hazardous substances
20 01 14*	acids
20 01 15*	alkalines

They are currently present in Schedule 2, Table S2.7 and S2.8 of the permit therefore no new EWC codes have been added to the permit as a result of the permit review.

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 arising from the treatment of water-based liquid waste.

- Total Volatile Organic Compounds (TVOCs), 20 mg/m³
- Hydrogen Chloride (HCl), 5 mg/m³

Emissions to sewer (S1) arising from the treatment of water-based liquid waste.

- Adsorbable organically bound halogens (AOX), 1 mg/l
- Arsenic (As), 0.1 mg/l
- Cadmium (Cd), 0.1 mg/l
- Chromium (Cr), 0.3 mg/l
- Copper (Cu), 0.5 mg/l
- Free cyanide (CN⁻), 0.1 mg/l
- Hexavalent chromium (Cr(VI)), 0.1 mg/l
- Hydrocarbon oil index (HOI), 10 mg/l
- Lead (Pb), 0.3 mg/l
- Mercury (Hg), 10 µg/l
- Nickel (Ni), 1 mg/l
- Zinc (Zn), 2 mg/l

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

Monitoring

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

- Total Volatile Organic Compounds (TVOCs)
- Hydrogen Chloride (HCl)
- Hydrogen Sulphide (H₂S)
- Ammonia (NH₃)

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

- Adsorbable organically bound halogens (AOX)
- Arsenic (As)
- Benzene, toluene, ethylbenzene, xylene (BTEX)
- Cadmium (Cd)
- Chromium (Cr)
- Copper (Cu)
- Free cyanide (CN⁻)
- Hexavalent chromium (Cr(VI))
- Hydrocarbon oil index (HOI)
- Lead (Pb)
- Manganese (Mn)
- Mercury (Hg)
- Nickel (Ni)
- PFOA
- PFOS
- Zinc (Zn)

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 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.