

## Permitting Decisions- Bespoke Permit

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We have decided to grant the permit for CSG Avonmouth operated by Cleansing Service Group Limited.

The permit number is EPR/FP3823PB/A001.

The permit was granted on 10/03/2026.

The application is for:

An aqueous waste treatment installation, accepting hazardous and non-hazardous waste oils and aqueous effluents consisting of:

- A Section 5.3 Part A(1)(a)(ii) activity for the treatment of aqueous waste by oil/water separation.
- A Section 5.3 Part A(1)(a)(ii) activity and a Section 5.4 Part A(1)(a)(ii) activity for the treatment of hazardous and non-hazardous aqueous effluents.
- A Section 5.6 Part A(1)(a) activity for the temporary storage of non-hazardous waste.
- Directly Associated Activities (DAAs) including the storage of hazardous wastes as substitute raw materials, washing of tankers and storage of non-hazardous waste.

Wastes are screened using a rotary screen to remove any solids prior to transfer of the remaining aqueous effluents into storage tanks. The wastes are treated in vented tanks by gravitational separation and pH adjustment prior to transfer off-site of sludges and oils, and disposal of the treated effluent via discharge to foul sewer. Once tankers have offloaded through the rotary screen the tankers are taken onto a ramp and washed out using a low pressure but high-volume water hose. The liquid is then pumped into the treatment plant with the solids falling into the Hi-Tip.

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:

- 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
- 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.

## Key issues of the decision

### Emission to sewer

Process effluent from the treatment of aqueous effluents and oils/oily wastes by gravity separation is discharged to foul sewer for treatment at Avonmouth Sewerage Treatment Works (STW), prior to discharge to the Severn Estuary. The site is to replace the existing CSG site at Bristol.

The applicant carried out marine modelling to assess the impact of the emission on the receiving water body. We are satisfied that the assessment demonstrates that the emission is unlikely to result in significant impacts to the receiving water body. We can therefore conclude that there will be no significant effects/impact upon on The Severn Estuary Special Area of Conservation (SAC), Special Protection Area (SPA), Site of Special Scientific Interest (SSSI) and Ramsar.

We have considered the types of waste treatment proposed and concluded that the waste treatment activities, oil/water separation and treatment of waste effluents (AR1, AR2 and AR4) constitute 'treatment of water-based liquid wastes'. Waste treatment activities including 'treatment of water-based liquid wastes', are required to comply with the BAT Conclusions for waste treatment. The site must therefore comply with any relevant BAT-AELs upon issue of the permit. The emission limits derived from the BAT AELs are subject to the notes accompanying the tables and permit condition 3.5.1.

The emission limits the operator must comply with and the associated monitoring requirements are listed in Schedule 3, Table S3.2.

## Emission to air

Emissions from the oil and effluent storage and treatment tanks such as emissions of Volatile Organic Compounds (VOCs) are combined and channelled through an abatement system (type to be confirmed by pre-operational condition 1) prior to discharge to air.

Emissions from tank vents primarily occur as a result of the displacement of air during tank-to-tank transfer or tank filling. We have assessed the emission using the H1 methodology and conclude that the environmental impact will likely be insignificant. We can therefore conclude that there will be no significant effects/impact upon on The Severn Estuary Special Area of Conservation (SAC), Special Protection Area (SPA), Site of Special Scientific Interest (SSSI) and Ramsar.

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## **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:

- LA – Planning
- LA – Environmental Health
- Marine Management Org
- Sewerage Authorities
- Director of PH & UKHSA

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

## Operator

We are satisfied that the applicant (now the operator) is the person who will have control over the operation of the facility after the grant of the permit. The decision was taken in accordance with our guidance on legal operator for environmental permits.

## 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', guidance on waste recovery plans and permits

The extent of the facility 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 within our screening distances for these designations.

We have assessed the application and its potential to affect sites of nature conservation, landscape, heritage and protected species and habitat designations identified in the nature conservation screening report as part of the permitting process.

We consider that the application will not affect any site of nature conservation, landscape and heritage, and/or protected species or habitats identified.

We have not consulted Natural England.

The decision was taken in accordance with our guidance.

## **Environmental impact assessment**

In determining the application, we have considered the Environmental Statement.

We have also considered the planning permission and the committee report approving it.

## **Environmental risk**

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

The operator's risk assessment is satisfactory.

## **Operating techniques**

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

## **General operating techniques**

The site has an EMS management system accredited to ISO 14001.

The following guidance is relevant to the operation of the site:

- Chemical waste: appropriate measures for your permitted facility
- Waste Treatment BAT conclusions.

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.

## **Operating techniques for emissions that screen out as insignificant**

Emissions of TVOCs and HCl to air and As, Cd, Cr, Cu, Pb, Hg, Ni, Zn, PFOA, PFOS and HOI to water have been screened out as insignificant, and so we agree that the applicant's proposed techniques are Best Available Techniques (BAT) for the installation.

We consider that the emission limits included in the installation permit reflect BAT for the sector.

## **National Air Pollution Control Programme**

We have considered the National Air Pollution Control Programme as required by the National Emissions Ceilings Regulations 2018. By setting emission limit values in line with technical guidance we are minimising emissions to air. This will aid the delivery of national air quality targets. We do not consider that we need to include any additional conditions in this 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.
- they are a suitable waste process aid as a substitution for raw material.

## Pre-operational conditions

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

The operator was unable to confirm their final choice of abatement system serving the emission from the treatment/storage tanks. Due to this, a pre-operational condition has been included for the operator to submit a written report detailing the abatement system to be used on emission point A1 to air and to confirm that it meets the requirements of the Waste Treatment BATC.

## Emission Limits

Emission Limit Values (ELVs) and equivalent parameters or technical measures based on Best Available Techniques (BAT) have been added for the following substances:

### Air

- Total Volatile Organic Compounds (TVOCs)
- Hydrogen Chloride (HCl)

### Water (indirect emission via WWTW)

- Arsenic (expressed as As)
- Cadmium (expressed as Cd)
- Chromium (expressed as Cr)
- Hexavalent chromium (expressed as Cr(VI))
- Copper (expressed as Cu)
- Lead (expressed as Pb)
- Mercury (expressed as Hg)
- Nickel (expressed as Ni)
- Zinc (expressed as Zn)
- Hydrocarbon oil index (HOI)
- Free cyanide (CN<sup>-</sup>)
- Absorbable organically bound halogens (AOX)

## **Monitoring**

We have decided that monitoring should be carried out for the parameters listed in the permit, using the methods detailed and to the frequencies specified.

These monitoring requirements have been included in order to comply with the Waste Treatment BAT Conclusions.

We made these decisions in accordance with the Waste Treatment BAT Conclusions.

Based on the information in the application we are satisfied that the operator's techniques, personnel and equipment have either MCERTS certification or MCERTS accreditation as appropriate.

## **Reporting**

We have specified reporting in the permit.

We made these decisions in accordance with the Waste Treatment BATC.

## **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.

We have checked our systems to ensure that all relevant convictions have been declared.

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.

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, newspaper advertising and the way in which we have considered these in the determination process.

### **Responses from organisations listed in the consultation section:**

Response received from Local Authority – Environmental Health.

Brief summary of issues raised: No sustainable objection. Noted that a site 500m north has been identified as contaminated by radioactivity.

Summary of actions taken: The site condition report submitted with the application has been assessed and is deemed acceptable.

Response received from Sewerage Authority.

Brief summary of issues raised: Applicant invited to submit pre-development application to Wessex Water and provide details of flow rates required and proposed commencement of operation dates.

Summary of actions taken: Information passed on to the applicant and the applicant has since contacted the Sewerage Authority to arrange connection to the sewerage network.

Response received from Director of PH & UKHSA.

Brief summary of issues raised: No significant concerns.

Summary of actions taken: No action taken.