

Permitting Decisions- Environment Agency Initiated Variation

We have issued an Environment Agency initiated variation for Trafford Park Waste Oil Facility 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/SP3134AC/V004.

The permit variation was issued on 04/06/2026

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:

- <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.
- [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

Implementation of abatement on storage tanks

The operator identified as part of the Regulation 61 Notice response that they had the following tanks LC-1, HC-2 and LC-3 used for onsite storage of waste oil and oily waters. On review of these tanks, it was identified in the Regulation 61 Notice that no abatement was in place.

Appropriate measures 6.1.1 and BAT 44 requires that in order to reduce emissions of organic compounds to air, BAT is to apply BAT 14d (which requires the containment, collection and treatment of diffuse emissions) and to use one or a combination of the techniques including adsorption, thermal oxidation or wet scrubbing. The operator is therefore required to abate tanks, we therefore

implemented IC1a and IC1b which requires that the operator submit a plan to the Environment Agency for approval to implement abatement systems and ensure that they meet the requirements of the Environment Agency's guidance Chemical waste: appropriate measures for permitted facilities.

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 17/12/2024 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

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 31/03/2025.

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 05/02/2026. 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	<p>The operator confirmed that they currently meet the requirements of all appropriate measures in this section.</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 pre-acceptance, acceptance and tracking appropriate measures	CC	<p>The operator confirmed that they currently meet the requirements of all appropriate measures in this section.</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	FC	<p>The operator has stated in their Regulation 61 Notice that they are compliant with Section 4 of the Appropriate Measures.</p> <p>However, following the permit review we note that emissions from the bulk storage tanks used to store oily wastes are not abated as per appropriate measure 4.43. We have included IC1a and IC1b in the permit to ensure that the operator submit an abatement plan to the Environment Agency for written approval and implement abatement as necessary.</p> <p>Compliance with the rest of the appropriate measures in this section of the guidance</p>

		to which the improvement programme does not apply has been incorporated into the varied permit through the updated operating techniques listed in Table S1.2.
Waste treatment appropriate measures	NA	Section 5 of the Appropriate Measures guidance is not applicable.
Emissions control appropriate measures	FC	<p>The operator advised that they that they currently meet the requirements of the appropriate measures. However, following the permit review we note that emissions from storage tanks which vent to atmosphere are not abated in line with section 6.1 of the 'Chemical waste: appropriate measures for permitted facilities. We have therefore included IC1a and IC1b in the permit to ensure that the operator submit an abatement plan to the Environment Agency for written approval and implement abatement as necessary.</p> <p>Compliance with the rest of the appropriate measures in this section of the guidance to which the improvement programme does not apply has been incorporated into the varied permit through the updated operating techniques listed in Table S1.2.</p>
Emissions monitoring and limits appropriate measures	CC	<p>The operator stated in their Regulation 61 Notice and request for further information response that they were compliant with the requirements of this section of the appropriate measures, because waste oils and aqueous liquid wastes are stored in tanks under ambient conditions. They stated that the emission flows from these tanks are unsuitable for accurate monitoring.</p> <p>We have reviewed the operator's justification regarding the storage of waste oil and are satisfied that monitoring is not required, provided that the vents to the atmosphere which may contain VOCs are suitably abated, based on the risks posed by the storage of oils within the tanks.</p> <p>We have therefore included IC1a and IC1b in the permit to ensure that the operator submit an abatement plan to the Environment Agency for written approval and</p>

		<p>implement abatement as necessary and added process monitoring for this abatement in the permit.</p> <p>Compliance with the rest of the appropriate measures in this section of the guidance to which the improvement programme does not apply has been incorporated into the varied permit through the updated operating techniques listed in Table S1.2.</p>
Process efficiency appropriate measures	CC	<p>The operator confirmed that they currently meet the requirements of all appropriate measures in this section stating that water, energy and resources are managed effectively.</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 not 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		No medium combustion plant and specified generators on site.
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		

<p>Change to Activities, Table S1.1</p>	<p>The Activities present in Table S1.1 of the permit have all been updated to reflect the requirements of the Appropriate Measures and to a level of detail required to ensure adequate management of risk each of the Activities pose from the Installation 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 storage vessels, their capacities and where appropriate their composition. • Waste quantities and limits to the storage activities have been added where possible to reflect procedures and capacities at the Installation. • We have consolidated the temporary storage of waste resulting from emptying of containers and empty packaging on site into the S5.6 activity and waste operation storage prior to the onward transfer offsite for recovery or disposal. • We have consolidated the existing waste exemption held by the operator for the site under WEX364573 and added a waste operation for storage and transfer of non-hazardous waste on site.
<p>Change to Operating Techniques, Table S1.2</p>	<p>The Operating Techniques for the site have been amended in line with the Installation activities confirming compliance with the Chemical waste: appropriate measures for permitted facilities Version published 18 November 2020.</p>
<p>Addition of Improvement Conditions, Table S1.3</p>	<p>New Improvement Conditions has been added to the permit. See Assessment of the installation's compliance and key issues of the decision above.</p>
<p>Change to Schedule 2 Table for EWC Codes accepted at site</p>	<p>We have separated the waste codes table into hazardous waste EWC code list for the installation activity in table S2.2 and non-hazardous EWC code list for the waste operation in table S2.3.</p> <p>The site previously held a waste exemption (S1 and S2 Exemption WEX364573) for storing hazardous and non-hazardous waste onsite. During the determination process, the operator requested that the waste codes covered by this exemption be added to the permit. These codes have now been incorporated into the permit as a waste operation, authorising the aggregated storage of hazardous and non-hazardous waste up to 20,000 tonnes per year.</p>

	<p>This inclusion does not increase the amount of waste stored onsite at any one time. It enables the operator to deregister the exemption.</p> <p>We have added a list of EWC waste codes from the S1 and S2 exemption held under waste exemption. See list below.</p>
Addition of Table S3.2	Table S3.2 Process monitoring requirements has now been added to the permit, requiring a demonstration of abatement process efficiency in line with the requirements of BAT and the Appropriate Measures.
Addition of Table S4.1	Table S4.1 Reporting of monitoring data has now been added to the permit, in line with the requirements of BAT and the Appropriate Measures.
Changes to Table S4.3 formerly S4.1	Performance parameters Table S4.3 has had additional row included for energy usage in line with the requirements of BAT and the Appropriate Measures.
Changes to Table S4.4 formerly S4.2	Reporting forms Table S4.4 has had additional row included for energy usage in line with the requirements of BAT and the Appropriate Measures.
Schedule 7	Added new site plan.

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 a plan which we consider to be satisfactory.

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

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.

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 complies with the appropriate technical guidance for this facility, Chemical waste: appropriate measures for permitted facilities. See Table 1 and key issues of the decision.

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

Changes to EWC codes

The following hazardous waste code have been added to the permit at the request of the operator.

15 01 10*	packaging containing residues of or contaminated by hazardous substances
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The following hazardous waste codes covered by S1 and S2 waste exemptions under WEX364573 have been added in the permit for storage and transfer operations only at the request of the operator to enable them to de-register S1 and S2 exemption.

08 01 11*	waste paint and varnish containing organic solvents or other hazardous substances
11 01 13*	degreasing wastes containing hazardous substances
14 06 02*	other halogenated solvents and solvent mixtures
14 06 03*	other solvents and solvent mixtures
15 02 02*	absorbents, filter materials (including oil filters not otherwise specified), wiping cloths, protective clothing contaminated by hazardous substances
16 01 07*	oil filters

16 02 13*	discarded equipment containing hazardous components other than those mentioned in 16 02 09 to 16 02 12
16 06 01*	lead batteries
16 06 02*	Ni-Cd batteries
16 06 03*	mercury-containing batteries
17 02 04*	glass, plastic and wood containing or contaminated with hazardous substances
20 01 13*	solvents
20 01 21*	fluorescent tubes and other mercury-containing waste
20 01 27*	paint, inks, adhesives and resins containing hazardous substances
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

The following non-hazardous waste codes covered by S1 and S2 waste exemptions under WEX364573 have been added in the permit for storage and transfer operations only at the request of the operator to enable them to de-register S1 and S2 exemption.

08 01 12	waste paint and varnish other than those mentioned in 08 01 11
15 01 02	plastic packaging
15 02 03	absorbents, filter materials, wiping cloths and protective clothing other than those mentioned in 15 02 02
16 01 03	end-of-life tyres
16 01 17	ferrous metal
16 01 18	non-ferrous metal
16 01 19	Plastic
16 02 14	discarded equipment other than those mentioned in 16 02 09 to 16 02 13
16 02 16	components removed from discarded equipment other than those mentioned in 16 02 15
16 06 04	alkaline batteries (except 16 06 03)
16 06 05	other batteries and accumulators
16 10 02	aqueous liquid wastes other than those mentioned in 16 10 01

17 02 01	Wood
17 02 03	Plastic
17 04 01	copper, bronze, brass
17 04 02	Aluminium
17 04 03	Lead
17 04 04	Zinc
17 04 05	iron and steel
17 04 06	Tin
17 04 07	mixed metals
17 04 11	cables other than those mentioned in 17 04 10
17 06 04	insulation materials other than those mentioned in 17 06 01 and 17 06 03
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 36	discarded electrical and electronic equipment other than those mentioned in 20 01 21, 20 01 23 and 20 01 35

Emission limits

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

The activity on site is limited to storage of waste oil and aqueous wastes in tanks with no treatment activity and so we have included conditions for abatement to be installed on the tank vents with process monitoring in place to monitor emissions and no limit set in line with BAT Conclusions for Waste Treatment and compliance with the appropriate measures guidance for permitted facilities.

Monitoring

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

Table S3.2 Process monitoring requirement to assess abatement efficiency.

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:

- process monitoring specified in table S3.2.

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.