

Decision document variation

We have decided to grant the variation for Rochester Waste Treatment Facility operated by Greenway Environmental Limited.

The variation number is EPR/WP3036ZR/V010

The permit was issued on 22/07/2026

This permit variation has been issued to remove all clinical waste treatment resulting in the removal of Section 5.3 Part A(1)(a)(ii) Treatment of infectious waste and the waste activity for Light compaction of non-infectious offensive waste. The site has now become a waste transfer station and will also be carrying out blending, mixing and repackaging of a broad range of both hazardous and non-hazardous wastes. There will be a battery sorting activity and a hazardous and non-hazardous container washing activity. This variation has included:

The maximum storage of waste on site at any one time will be 750 tonnes. The maximum amount of waste accepted annually to site under all activities will be 28,000 tonnes. This will be made up of 18,000 tonnes of hazardous waste, and 10,000 tonnes of non-hazardous waste.

The activities include:

Installation Activities

AR1 - Section 5.3 Part A(1)(a)(iii) Disposal or recovery of hazardous waste with a capacity exceeding 10 tonnes per day involving blending or mixing.

AR2 – Section 5.3 Part A(1)(a)(iv) Disposal or recovery of hazardous waste with a capacity exceeding 10 tonnes per day involving repackaging.

AR3 – Section 5.3 Part A(1)(a)(ii) – Disposal or recovery of hazardous waste with a capacity exceeding 10 tonnes per day involving physico-chemical treatment for sorting of hazardous waste batteries.

AR4 – Section 5.3 Part A(1)(a)(ii) – Disposal or recovery of hazardous waste with a capacity exceeding 10 tonnes per day involving physico-chemical treatment for the washing of Hazardous containers.

AR5 - Section 5.6 Part A(1)(a) – Temporary storage of hazardous waste with a total capacity exceeding 50 tonnes .

DAAAs

AR6 - Crushing of empty non-hazardous containers

AR7 - Raw materials storage

AR8 - Abatement systems

Waste Activities

AR9 - Treatment of non-hazardous waste via mixing, blending and bulking.

AR10 - Storage of non-hazardous waste.

AR11 - Physical treatment of non-hazardous waste - container washing.

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
- explains why we have also made an Environment Agency initiated variation
- summarises the engagement carried out because this is a site of high public interest
- 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

Repackaging, Blending and Mixing

A H1 risk assessment to air was undertaken for the repackaging, blending and mixing operation in the location referenced as A1 on document "SPROC003A Site plan storage V3". As no emissions data was available all emissions of VOCs (Volatile Organic Compounds) were screened as benzene, in accordance with the guidance document 'Air Emissions Risk Assessment for your Environmental Permit' (the Air Emissions Guidance) for situations where the speciation of VOCs is not known.

The EA has set Environmental Assessment Levels (EALs) in the Air Emissions Guidance. The long term and short-term EALs relevant are detailed below:

- A limit for the daily mean of 30 $\mu\text{g}/\text{m}^3$.
- A limit for the annual mean of 5 $\mu\text{g}/\text{m}^3$

On completion of a H1 risk assessment to air the VOC emissions on the long term annual mean benzene standard of 5 $\mu\text{g}/\text{m}^3$ screened out. VOC emissions could not be screened out for the short term 24 hour mean standard of 30 $\mu\text{g}/\text{m}^3$.

This resulted in the applicant submitting a full air dispersion model as part of their application, in order to show the process contribution (PC) to air from the operator at any environmental receptor that might be impacted by the plant. Both short-term and long-term PCs have been calculated and compared with the EALs.

It was identified that the existing background level is well below the regulatory annual mean limit at 0.61 $\mu\text{g}/\text{m}^3$. This means the emission is unlikely to exceed the regulatory limit. The impact of short-term process emissions cannot be screened out as 'insignificant' across the entire modelled grid". However, process contributions are <10% of the 30 $\mu\text{g}/\text{m}^3$ daily mean EAL and can be screened out as 'insignificant' at all sensitive receptors. The report has been audited by our Air Quality Management team and deemed to be medium risk.

Given that the site will employ mitigation in line with BAT and appropriate measures, in summary this means that the risk level is considered low. The activity will be undertaken inside a booth with a Local Exhaust Ventilation system and will utilise a carbon filter which is considered BAT for the abatement of VOCs. The carbon filter will also mitigate any odorous compounds from the emission point.

Hazardous Drum Washing

The operator will undertake the washing of containers that have previously held hazardous waste. Containers that contained substances classified as Category 1 or 2 for acute toxicity under the CLP Regulation (EC) No 1272/2008 will be excluded from acceptance. Wastes exhibiting hazardous properties HP7, HP8, HP10, HP11, HP12, HP13 and HP14 will also not be accepted. The exclusion of HP12 is particularly significant, as it mitigates the risk of releasing acutely toxic gases.

The operator has confirmed that only containers free from liquid residues will be subject to washing. On this basis, the potential for VOC emissions is considered negligible. This assessment is further supported by evidence demonstrating that the washing process will be undertaken within a fully enclosed cabinet system, with all wash water collected in a dedicated tank and subsequently transferred to an IBC for off-site disposal. Accordingly, the risk of atmospheric emissions arising from this activity is assessed as very low

Segregation and compatibility of stored wastes

Ensuring compatibility of stored hazardous waste is a key safety issue to the hazardous waste sector, for example preventing violent chemical reactions, toxic gas releases and fire and explosions.

The site will operate in accordance with Chemical waste appropriate measures and the HSE guidance HSG71. This sets the standards for safely storing chemicals and hazardous wastes in containers. The operator has submitted a site plan showing segregation. On arrival at the site wastes are assessed by a qualified chemist so that they are appropriately stored in the correct areas, preventing the risk of incompatibility.

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

The application was publicised on the GOV.UK website.

We consulted the following organisations:

Local Authority – Environmental Health/Environmental Protection department

UK Health Security Agency

Fire Rescue Service

Health and Safety Executive

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

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 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 including the discharge point.

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.

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.

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, 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, 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 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.

Operating techniques for emissions that do not screen out as insignificant

Emissions of VOCs cannot be screened out as insignificant. We have assessed whether the proposed techniques are Best Available Techniques (BAT).

Please see Key issues, emissions to air which explain the operating techniques used.

The proposed techniques/emission levels for emissions that do not screen out as insignificant are in line with the techniques and benchmark levels contained in the technical guidance and we consider them to represent appropriate techniques for the facility. The permit conditions enable compliance with relevant BAT reference documents (BREFs) and BAT Conclusions, and Emission Limit Values (ELVs deliver compliance with BAT- Associated Emission Levels (AELs).

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.

Odour management

We have reviewed the odour management plan in accordance with our guidance on odour management.

We consider that the odour management plan is satisfactory and we approve this plan.

We have approved the odour management 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 applicant should keep the plans under constant review and revise them annually or if necessary sooner if there have been complaints arising from operations on site or if circumstances change. This is in accordance with our guidance 'Control and monitor emissions for your environmental permit'.

The plan has been incorporated into the operating techniques table S1.2 of the environmental permit.

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 table S1.2 of 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 permit.

Raw materials

We have specified limits and controls on the use of raw materials and fuels.

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 insert reference to guidance.

Pre-operational conditions

Based on the information provided within the application, it is considered necessary to include a pre-operational condition.

To mitigate the release of VOCs from emission point A1, as identified in the document “SPROC003A Site Plan Storage V3”, the operator proposes to undertake the repackaging, mixing, and blending of hazardous waste liquids within a booth fitted with local exhaust ventilation (LEV) and carbon filtration, as outlined in the key issues. However, this abatement system will not be installed at the point of permit determination.

Pre-operational condition PO1 will ensure that the proposed abatement measures are installed in accordance with BAT and appropriate measures prior to operation. The booth, including LEV and carbon filtration, must be fully operational before any repackaging, mixing, or blending of hazardous waste liquids is undertaken.

Improvement programme

Based on the information on the application, we consider that we need to include an improvement programme.

We have included an improvement programme (IC1) to ensure that the emission to air from point A1 referenced in SPROC003A site plan storage V3” is monitored to ensure the efficacy of the mitigation measures. Where the emissions do not screen out inline with the original H1 assessment, provided during determination, the operator will be required to conduct further modelling using detailed air dispersion modelling. Further to this the operator may be required to install further abatement measures to reduce or abate the emission.

Emission limits

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

Point source emission from the abatement plant serving the shredder (HEPA filter and carbon filter) including parameters :

- Bacillus spores 1000 cfu per cubic metre
- Total volatile organic compounds (TVOC) 30 mg per cubic metre
- Particulate matter 5 mg per cubic metre

Point source emission from the abatement plant serving the steam auger (condenser, HEPA filter and carbon filter) including parameters

- Bacillus spores 1000 cfu per cubic metre
- Total volatile organic compounds (TVOC) 30 mg per cubic metre
- Particulate matter 5 mg per cubic metre

Effluent discharge Condensate from treatment chamber Bin washing effluent

- Bacillus Spores (spiked organisms) 300 cfu per litre

The above parameters have been deleted from the permit as these activities are no longer undertaken.

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

Point source emission from the blending mixing and bulking operation AR1 as shown on the document referenced SPROC003A site plan storage V3 including Parameters:

- Total Volatile Organic Compounds (TVOCs) 30 mg/m³
- Hydrogen chloride (HCL) 5 mg/N m³

The inclusion of repackaging, blending, and mixing activities is expected to result in emissions of VOCs to air. These emissions must be appropriately controlled to ensure compliance with the above emission limit values.

Monitoring

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

Parameters as detailed above under Emission Limits.

Fugitive Microbial emissions monitoring (spiked organisms):

- Air – sample points <10 m from the treatment plant, Bacillus Spores 1,000 cfu per cubic metre
- Air – sample points >10 m from the treatment plant Bacillus Spores 300 cfu per cubic metre
- Surface – sample point <10 m from the treatment plant Bacillus Spores 20,000 cfu per square metre per hour
- Surface – sample point >10 m from the treatment plant Bacillus Spores 5,000 cfu per square metre per hour

Steam treatment of infectious waste in steam auger:

- Routine efficacy monitoring
- Repeated plant validation

These monitoring requirements have been deleted as the associated activities are no longer undertaken

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

A1 Emission control system exhaust, solvent treatment plant, as shown on the document referenced SPROC003A site plan storage V3

- Total Volatile Organic Compounds (TVOCs) 30 mg/m³
- Hydrogen chloride (HCL) 5mg/Nm³

Carbon filters/bag filters on emission point A1 to be confirmed from local exhaust ventilation serving repackaging/bulking area:

- Efficiency assessment

These monitoring requirements have been included in order to comply with BAT and ensure the permit is up to date with modern permit conditions

We made these decisions in accordance with the Waste Treatment BAT conclusions August 2018.

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

Reporting

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

- Emissions to sewer.
- Fugitive microbial emissions
- Routine efficacy monitoring (Steam treatment of waste in steam auger)
- Repeated plant validation (Steam treatment of waste in steam auger)

There are no emissions to sewer, and all other parameters are no longer relevant as the associated activities have been removed.

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

Emissions to air from point A1 as referenced in document referenced SPROC003A site plan storage V3

The inclusion of repackaging, blending, and mixing activities is expected to result in emissions of VOCs to air. These emissions must be appropriately reported in accordance with modern permit conditions.

We made these decisions in accordance with the Waste Treatment BAT conclusions August 2018.

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 UK Health Security Agency

Brief summary of issues raised: The main emissions of potential concern are fugitive emissions of volatile organic compounds (VOC) and odour these are controlled by the systems the applicant has in place.

Summary of actions taken: See Key issues : emission to air . In addition, the applicant also submitted an Odour Management Plan. All odorous waste is contained in packages and is stored in either a building or chemical safe cabinets.