

Permitting Decisions - Environment Agency Initiated Variation

We have issued an Environment Agency initiated variation for Grange Mill Lane, 8 Grange Mill Lane. Sheffield, operated by Ronald Hull Jnr. Ltd., following a review of the permit in accordance with Environmental Permitting (England and Wales) Regulations 2016, regulation 34(1).

The variation number is EPR/KB3902KR/V003.

The permit variation was issued on 14/08/2026.

Permit Review

The 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 for Treating metal waste in shredders and End-of-Life Vehicles (ELVs), including 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 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

Assessment of the Regulation 61 Notice and Request for further information (RFI) responses from the operator showed that the current permit did not accurately reflect site operations. Therefore the following changes were made to the varied permit to more accurately reflect the activities performed at the site.

- The operations have now been grouped into 6 distinct areas:
 - Metal Shredding (S5.4 A(1) (b) (iv)) (and DAA's)
 - End -of-Life Vehicles (ELV) Authorised Treatment Facility (ATF) operation
 - Metal recycling
 - Storage of Furnace ready scrap
 - Hazardous Waste Transfer station
 - Non-Hazardous Waste Transfer station
- The ELV ATF operation (AR5) has been mothballed, but the operator wishes to restart the operations in near future. A pre-operational condition (PO1) has been added to the varied permit to ensure compliance with the ELV appropriate measures prior to commencement of this operation.
- Improvement Condition IC11 requires the operator to review their emissions to sewer and propose abatement if deemed necessary to ensure compliance with BAT AELs.

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 20th October 2021 our Treating metal waste in shredders appropriate measures guidance was published on gov.uk. This technical guidance explains the standards that are relevant to regulated facilities with an environmental permit to mechanically treat metal waste in shredders and incorporates 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.

- End of life vehicles (ELVs): appropriate measures for permitted facilities – published October 2023

We issued a notice under regulation 61(1) of the Environmental Permitting (England and Wales) Regulations 2016 (a Regulation 61 Notice) on 02/06/2025 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 for; treating waste in metal shredders; WEEE; WTEE and ELV.

The notices 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

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.

The Regulation 61 notice responses from the Operator were received on 02/12/2025 for both activities relating to treatment of metal waste in shredders, and for activities relating to treatment of WEEE.

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 (RFI 1) and the operator provided information on 13/02/2026 and 12/03/2026. We subsequently requested further information by email (RFI 2 and RFI 3). The operator responded to RFI 2 on the 20/02/2026, 04/03/2026, 12/03/2026 and 07/04/2026; RFI 3 on 21/05/2026 and 26/05/2026; and RFI 4 on the 24/07/2026 and 29/07/2026. We made a copy of this information available on our public register.

Summary of additional information received

- Confirmation that all plant on site is powered by grid electricity.
- Details of dust abatement system
- Detail of handling of shredder fines.
- Aerial photos confirming location and function of plant.

- Confirmation of site activities.
- Confirmation of accepted waste codes.
- Confirmation of process and material flow.
- Confirmation of the conveyer belts that are covered and measures in place to minimise fugitive dust emissions
- Confirmation that no WEEE or WTEE is treated on site.
- WM3 classification for mixed waste stream coded 19 12 12 and images of 19 12 12 and 19 12 04

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	<u>Treating Metal Waste In Shredders: Appropriate Measures</u> 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. <u>Waste electrical and electronic equipment (WEEE): appropriate measures</u> The operator confirmed that WEEE accepted for storage only. Compliance with the appropriate measures in this section not applicable. <u>Waste temperature exchange equipment: appropriate measures</u> The operator confirmed that WTEEE accepted for storage only. Compliance with the appropriate measures in this section not applicable. <u>ELV’s: Appropriate Measures</u> The operator confirmed that they do not currently meet the requirements of all appropriate measures in this section, though they are not currently accepting ELV’s for processing. They plan to accept ELV’s in future, and a pre-operational condition (PO1) has been added to the permit to allow for the necessary re-introduction of management systems, procedure and abatement measures at a future date.
Waste pre-acceptance, acceptance and tracking appropriate measures	CC	<u>Treating Metal Waste In Shredders: Appropriate Measures</u> 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. The operator has stated that measures 3.2.15, 3.2.16 & 3.2.17 – “Acceptance of drum or baled waste” are not applicable as they do not accept waste in this form. <u>Waste electrical and electronic equipment (WEEE): appropriate measures</u> The operator confirmed that they currently meet the requirements of all appropriate measures in this section.

		<u>Waste temperature exchange equipment: appropriate measures</u> The operator confirmed that they currently meet the requirements of all appropriate measures in this section. <u>ELV's: Appropriate Measures</u> The operator confirmed that they do not currently meet the requirements of all appropriate measures in this section, though they are not currently accepting ELV's for processing. They plan to accept ELV's in future, and a pre-operational condition (PO1) has been added to the permit to allow for the necessary re-introduction of management systems, procedure and abatement measures at a future date.
Waste storage, segregation and handling appropriate measures	CC	<u>Treating Metal Waste In Shredders: Appropriate Measures</u> 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. The operator has requested exemption from S4.3 Dangerous Substances and Explosive Atmospheres - Substances with the potential to produce explosive atmospheres are not handled onsite in sufficient quantities. <u>Waste electrical and electronic equipment (WEEE): appropriate measures</u> The operator confirmed that WEEE accepted for storage only. Compliance with the appropriate measures in this section not applicable. <u>Waste temperature exchange equipment: appropriate measures</u> The operator confirmed that WTEE accepted for storage only. Compliance with the appropriate measures in this section not applicable. <u>ELV: Appropriate Measures</u> 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 treatment appropriate measures	CC	<u>Treating Metal Waste In Shredders: Appropriate Measures</u> 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. <u>Waste electrical and electronic equipment (WEEE): appropriate measures</u> The operator confirmed that WEEE accepted for storage only. Compliance with the appropriate measures in this section not applicable. <u>Waste temperature exchange equipment: appropriate measures</u> The operator confirmed that WTEE accepted for storage only. Compliance with the appropriate measures in this section not applicable. <u>ELV's: Appropriate Measures</u> The operator confirmed that they do not currently meet the requirements of all appropriate measures in this section, though they are not currently accepting ELV's for processing. They plan to accept ELV's in future, and a pre-operational condition (PO1) has been added to the permit to allow for the necessary re-introduction of management systems, procedure and abatement measures at a future date.
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Emissions control appropriate measures	CC	<u>Treating Metal Waste In Shredders: Appropriate Measures</u> The operator confirmed that they currently meet the requirements of the appropriate measures in this section. <u>WEEE appropriate measures:</u> 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. <u>Waste temperature exchange equipment: appropriate measures</u> The operator confirmed that WTEE accepted for storage only. Compliance with the appropriate measures in this section is not applicable. <u>ELV appropriate measures:</u> The operator confirmed that they do not currently meet the requirements of all appropriate measures in this section, though they are not currently accepting ELV's for processing. They plan to accept ELV's in future, and a pre-operational condition (PO1) has been added to the permit to allow for the necessary re-introduction of management systems, procedure and abatement measures at a future date.
Emissions monitoring and limits appropriate measures	FC	<u>Treating Metal Waste In Shredders: Appropriate Measures</u> The operator confirmed that they currently meet the requirements of the appropriate measures in this section with the exception of: • Section 6.4, Point 1 which requires the operator to have an emissions inventory which characterises the parameters of the point source emissions to water and sewer. We have included an improvement condition (IC11) which requires the completion of an emissions inventory and H1 Risk Assessment for the point source emissions to sewer. Compliance with the other 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 confirmed that they currently do not meet the requirements for air and water emissions. The following improvement condition in the permit requires them to monitor, report on and assess the air and water emissions from the site. Using the H1

		assessment tool. IC11 – Monitoring, characterisation and reporting of point source emissions to water using the H1 assessment tool. <u>Waste electrical and electronic equipment (WEEE): appropriate measures</u> The operator confirmed that WEEE accepted for storage only. Compliance with the appropriate measures in this section not applicable. <u>Waste temperature exchange equipment: appropriate measures</u> The operator confirmed that WTEE accepted for storage only. Compliance with the appropriate measures in this section is not applicable. <u>ELV's: Appropriate Measures</u> The operator confirmed that they do not currently meet the requirements of all appropriate measures in this section, though they are not currently accepting ELV's for processing. They plan to accept ELV's in future, and a pre-operational condition (PO1) has been added to the permit to allow for the necessary re-introduction of management systems, procedure and abatement measures at a future date.
Process efficiency appropriate measures	FC	<u>Treating Metal Waste In Shredders: Appropriate Measures</u> The operator confirmed that they currently meet the requirements of the appropriate measures in this section with the exception of: 8.1 Energy Efficiency sections 1-4 8.3 Water Use sections 1-3 8.4 Waste minimisation, recovery and disposal section 1 <u>Waste electrical and electronic equipment (WEEE): appropriate measures</u> The operator confirmed that WEEE accepted for storage only. Compliance with the appropriate measures in this section not applicable. <u>Waste temperature exchange equipment: appropriate measures</u> The operator confirmed that WTEE accepted for storage only. Compliance with the appropriate measures in this section is not applicable. <u>ELV's: Appropriate Measures</u> The operator confirmed that they do not currently meet the requirements of all appropriate measures in this section, though they are not currently accepting ELV's for processing. They plan to accept ELV's in future, and a pre-operational condition (PO1) has been added to the permit to allow for the necessary re-introduction of

		management systems, procedure and abatement measures at a future date.
Reg 61 requirement Assessment of response received		
Soil and groundwater risk assessment	The operator has not submitted a site condition report. If the operator chooses to submit no baseline data they accept that there is zero pre-existing contamination and the risk that they may be required to clean up any pre-existing contamination when the permit is surrendered.	
Medium combustion plant and specified generators	N/A. The operator confirmed that there are no combustion plant or generators associated with the permitted activity.	
Climate change	Submission of a climate change risk assessment is no longer an 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	
Changes to main body of permit conditions	Amended conditions 1.2.1, 1.3.1, and 4.2.2 to reflect the correct activity references (AR1 – AR9). Amended condition 2.3.5, to refer to the correct waste tables (S2.2, S2.3, S2.4, S2.5, S2.6, S2.7). Removal of condition 2.5 (Vehicle depollution and dismantling), as this activity is not carried out on this site. Removal of condition 2.6 (WEEE storage and treatment), as this activity is not carried out on this site. Condition 2.7 (Improvement programme) renumbered to 2.6. Condition 2.8 (Pre-operational conditions) renumbered to 2.7. 3.6.7 (Reporting of a radiation detection) has now been redefined as sub-condition 3.6.6 a) by the current permit template (published Dec 2025). 4.3.2 In the current permit, there are two entries with this number, a formatting error. 4.4.2 & 4.4.3 have now been combined into a single condition, 4.4.2 by the new template format.	
Schedule 1 - Operations		
Table S1.1 - Activities		
Change	Reason for change	

Removal and addition of DAA's	The following activities are no longer relevant and have been removed: • A3 - Storage of waste, excluding temporary storage of hazardous waste under Section 5.6 A(1)(a) – this is now replaced with AR3 – Storage of non-hazardous waste pending treatment • A4 - Storage of processed materials, excluding temporary storage of hazardous waste under Section 5.6 A(1)(a) – this is now an integral part of S5.4 Activity • A6 - Surface water discharge to foul sewer – discharge is now described in Table S3.2
Addition of new “Waste Operations” Section/Divide to Table	Change in template format
Addition of new waste operation activities	• AR5 – ELV ATF • AR6 – Metal Recycling • AR7 – Storage of Furnace Ready Scrap • AR8 – Hazardous Waste Transfer station • AR9 – Non-Hazardous Waste Transfer Station Waste codes have now been assigned to correct activities.
WEEE ATF removal	Only very small quantities accepted at site as part of mixed loads, and by prior arrangement. No treatment carried out on site – it is stored, then transferred off-site for treatment. Storage of WEEE is covered by Activities AR8 & AR9.
Renaming of activities e.g. A1 to AR1	Change in template format
Changes to description of AR1	Change in template format - text now starts with “ <i>Shredding of non-hazardous metal waste, and end-of-life vehicles</i> ”
Rewriting of limits for AR1	Limit description rewritten in line with new template guidance, inclusion of limit (450 Tonnes/day) for activity, with time limit of 6 months, and details of storage arrangements, including condition for storage of non-metallic fraction under cover.
Changes to description of AR2	Change in template format - Text now starts with “ <i>Manual and mechanical sorting, segregation and grading of non-hazardous fractions resulting from the shredding of wastes containing ferrous and non-ferrous metals.</i> ”
Rewriting of limits for AR2	Inclusion of condition for storage of non-metallic fraction under cover.
Change to limits of activities to AR5 (ELV), AR6 (Metal Recycling),	AR6, AR7, AR8 storage time limit changed from 3 years to 6 months, in line with guidance.

AR7 (Furnace-ready scrap)	
Change to limits of activities to AR6 (Metal Recycling)	Limits now explicitly prohibit granulation of cable under this activity, as the operator has confirmed that cables are accepted for storage only.
Table S1.2 - Operating techniques	
Change	Reason for change
Updating of table	Table S1.2 (operating techniques) has been updated to reflect the update to both the guidance and the documents approved by the Environment Agency as acceptable for site procedures. All superseded guidance and references have been removed and replaced. Information received from the operator (that was relevant to the site operations) during the review process has also been added.
Addition of entry for WEEE appropriate measures	Appropriate measures that are not applicable: • Waste Treatment (S6.1, S6.2, S6.3) • Emissions monitoring (S7.1) • Process Monitoring (S8.1, S8.2, S8.3).
Addition of entry for WTEE appropriate measures	Appropriate measures that are not applicable: • General management measures S2.1 - WTEE is only stored on site, there is no treatment. • Waste pre-acceptance S3.1.1 - Pre acceptance – the site only stores WTEE for transfer, there is no treatment. • Waste Treatment S5 (all sections) – The site does not treat WTEE. • Process Monitoring S6 (all sections) – The site does not treat WTEE. • Emissions Monitoring and Limits S7 (all sections) – The site does not treat WTEE.
Addition of entry for treating waste in metal shredders appropriate measures	Appropriate measures that are not applicable; • Waste pre-acceptance - S3.2 sections 15,16,17 - Acceptance of drums or tanks / baled metal waste - Drums / tanks and baled metals are not accepted onsite. • Waste Treatment - S4.3 Dangerous Substances and Explosive Atmospheres - Substances are not handled onsite in sufficient quantities. • Point Source emissions - S7.1, Sections 1-2 Emissions to Air, S7.2 Emissions limits - There are no point source emissions to air.

Addition of entry for End of Life Vehicles (ELV's) appropriate measures	Appropriate measures that are not applicable; The operator is currently permitted to accept ELV's for treatment but has stated that they currently cannot meet any of the relevant Appropriate Measures The operator is required to complete the Pre-Operational Measure PO1 before accepting ELV's for treatment.
Table S1.3 Substances, preparations and components to be removed from separately collected WEEE and Table S1.4 - Specified Treatment Methods for separately collected components of WEEE	
Change	Reason for change
Deletion of tables	These tables have been deleted as no WEEE treatment is carried out on site.
Table S1.5 - Improvement programme requirements	
Change	Reason for change
Renumbering of table	Following deletion of tables S1.3 and S1.4 from the permit, this table has now been renumbered to S1.3.
Addition and removal of improvement conditions	Completed improvement conditions that have been removed: - IC1, IC2, IC3, IC4, IC5, IC6, IC7, IC8 Improvement conditions that have been replaced: - IC9 and IC10 have been replaced by the new improvement condition IC11. Improvement conditions that have been added: - IC12 The updating of this table is explained further in the "Decisions Consideration" section of this document.
Table S1.4 Pre-operational measures for future development	
Change	Reason for change
Addition of table S1.4 and new pre-operational condition	Addition of new pre-operational condition (PO1) to cover operator planned introduction of full depollution activity to activity AR7 (Vehicle storage, depollution and dismantling ATF). The operator has confirmed that this activity is not currently operational.
Schedule 2 – Waste types, raw materials and fuels	
	Changes that have been made to Schedule 2 are detailed in the "changes to EWC codes" section of this document.

Schedule 3 – Monitoring and emissions limits in permit	
Table S3.1, emissions to air	Addition of new table for new emission to air point A1, existing table 3.1 has been renumbered to S3.2.
Table S3.2 – emissions to sewer	Addition of monitoring standard for PFOA, PFOS, Deca BDE, BS ISO 25101 in line with current guidance.
Table S3.3 – change of monitoring parameter	Monitoring parameter changed from Total Suspended Particulates (TSP) to PM10 (Particulate Matter <10um) in line with current guidance. Specifications also changed in line with new guidance.
Table S3.4 – Process Monitoring requirements	Addition of new table for process monitoring requirements, as required by WEEE appropriate measures for permitted facilities - section 5.4
Schedule 4 – Reporting	
Table S4.1 -Addition of reporting for process monitoring.	Parameters added for requirement of process monitoring as specified in WEEE appropriate measures for permitted facilities - section 5.4
Table S4.2 – Annual Production/treatment	Removal of “WEEE processed” – no WEEE treated by site.
Schedule 6 – Interpretation	
New definitions	Schedule 6 has been updated to include new definitions present in relation to the requirements of the Activities, Monitoring and Reporting of the permit. Some definitions have been removed in accordance with the change in guidance to the Appropriate Measures Guidance and updates to the Environmental Permitting Regulations 2016.

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 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 plans 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.

Changes to the permit conditions

We have varied the permit as stated in the variation notice.

Improvement programme

We have included an improvement programme to ensure that the permit is in accordance with the relevant appropriate measures and guidance.

Improvement conditions (IC1, IC2, IC3, IC4, IC5, IC6, IC7, IC8) have been completed.

Outstanding improvement conditions IC9 and IC10 have been replaced by a single new improvement condition, IC11, and a new additional improvement condition IC12 has been added.

Improvement Condition IC11 requires the operator to monitor their air and water emissions and submit a report to demonstrate their results and conclusions, including an H1 assessment and emissions inventory. An up-to-date inventory is required in line with the updated BAT AELs in Table S3.3 of the permit. These improvement conditions replace IC9 and IC10 from the current permit.

Improvement Condition IC12 requires the operator to review and update their written management system to ensure that they meet the requirements of the "Treating metal waste in shredders: appropriate measures for permitted facilities. Specifically, the operator must demonstrate that the following appropriate measure(s) of the guidance will be met:

Section 8, Process efficiency:

- 8.1 Energy Efficiency sections 1-4
- 8.3 Water Use sections 1-3
- 8.4 Waste minimisation, recovery and disposal section 1

A copy of the updated procedures shall be submitted to the Environment Agency for approval.

Changes to EWC codes

The tables (S2.2 to S2.7) have now been arranged in the same order as the activities listed in S1.1, in line with the permit template.

Activity	New EWC Table	Old EWC Table
AR1 – Metal Shredding	S2.2	None
AR5 – ELV ATF	S2.3	S2.2
AR6 – Metal Recycling	S2.4	S2.4
AR7 – Storage of Furnace Ready Scrap	S2.5	S2.5
AR8 – Hazardous Waste Transfer Station	S2.6	S2.6

AR9 – Non-Hazardous Waste Transfer Station	S2.7	None
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Table S2.2 (Metal Shredding).

Addition of a new table:

The current permit has no differentiation between the installation (Metal shredding) and waste metal recycling operation. This new table shows the materials solely destined for the installation activity (AR1).

Addition of waste codes:

The following codes have been added as they were requested by the operator. They also exist for the metal recycling operation (AR6), but the operator has requested that they exist for both the installation and metal recycling operations. (AR1 & AR6). The codes also exist in the current permit but had been incorrectly assigned to the hazardous waste transfer station activity (S2.6).

Changes to existing waste codes:

The following codes are non-standard code for metal shredding, but have been requested by the operator, and agreed as acceptable by the EA. For the code 19 12 04, the material accepted for recycling contains components where the plastic and metal is mixed. The description for these codes has been changed to describe the material accurately.

Waste code	Description
19	WASTES FROM WASTE MANAGEMENT FACILITIES, OFF-SITE WASTE WATER TREATMENT PLANTS AND THE PREPARATION OF WATER INTENDED FOR HUMAN CONSUMPTION AND WATER FOR INDUSTRIAL USE
19 12	wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified
19 12 04	plastic and rubber (containing metal wastes)
19 12 12	metal-rich waste from mechanical, biological recyclate, containing residual and entrained plastic, paper, textile, cardboard and any other form of residual packaging, labels or entrained material arising from mechanical and biological treatment with a metal content as provided in the current version of the Environmental Management System (EMS) and as agreed in writing with the Environment Agency

Table S2.3 (Permitted waste types and quantities for Vehicle storage, depollution and dismantling (authorised treatment) facility).

Addition of waste codes:

The following codes have been added as they were detailed in the returned Reg 61 Notice. The codes also exist in the current permit but had been incorrectly assigned to the hazardous waste transfer station activity (S2.6).

Waste code	Description
16	WASTES NOT OTHERWISE SPECIFIED IN THE LIST
16 01	end-of-life vehicles from different means of transport (including off-road machinery) and wastes from dismantling of end-of-life vehicles and vehicle maintenance (except 13, 14, 16 06 and 16 08)
16 01 03	end of life tyres
16 01 04*	end-of-life vehicles

Removal of waste codes:

There have been no codes removed from this table.

Table S2.3 (Permitted Waste Types for WEEE Authorised Treatment Facility)

Removal of waste codes:

Table S2.3 has been removed, as the operator has reported that no WEEE is treated on-site.

Table S2.4 (Permitted Waste types and quantities for Metal Recycling).

Addition of waste codes:

The following code has been added to dual code hazardous and non-hazardous cables in line with current guidance (hazardous and non-hazardous cables often arrive in mixed loads).

Waste code	Description
17	CONSTRUCTION AND DEMOLITION WASTES (INC. SOIL FROM CONTAMINATED SITES)
17 04	metals (including their alloys)
17 04 10*	cables containing oil, coal tar and other hazardous substances

Removal of waste codes:

The following codes have been removed as they are more appropriately located in the table for the ELV ATF (Table S2.3).

Waste code	Description
16	WASTES NOT OTHERWISE SPECIFIED IN THE LIST
16 01	end-of-life vehicles from different means of transport (including off-road machinery) and wastes from dismantling of end-of-life vehicles and vehicle maintenance (except 13, 14, 16 06 and 16 08)
16 01 03	end of life tyres
16 01 04*	end-of-life vehicles
16 06	batteries and accumulators
16 06 01*	lead batteries

Changes to existing waste codes:

The following code is a non-standard code for metal recycling, but has been requested by the operator, as the material accepted for recycling contains components where the plastic and metal is mixed. The description for this code has been changed to describe the material accurately.

Waste code	Description
19	WASTES FROM WASTE MANAGEMENT FACILITIES, OFF-SITE WASTE WATER TREATMENT PLANTS AND THE PREPARATION OF WATER INTENDED FOR HUMAN CONSUMPTION AND WATER FOR INDUSTRIAL USE
19 12	wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified
19 12 04	plastic and rubber (containing metal wastes)

Table S2.5 (Permitted Waste types and quantities for Furnace Ready Scrap Storage).

Removal of waste codes:

The following codes have been removed as they are more appropriately located in the table for the ELV ATF (Table S2.3).

Waste code	Description
16	WASTES NOT OTHERWISE SPECIFIED IN THE LIST
16 01	end-of-life vehicles from different means of transport (including off-road machinery) and waste from dismantling of end-of-life vehicles and vehicle maintenance (except 13, 14, 16 06 and 16 08)
16 01 17	ferrous metal
16 01 18	non-ferrous metal
16 01 22	components not otherwise specified
16	WASTES NOT OTHERWISE SPECIFIED IN THE LIST

16 06	batteries and accumulators
16 06 01*	lead batteries

The following code has been removed, as it already (and more appropriately) exists in the table for metal recycling (S2.4)

Waste code	Description
17	CONSTRUCTION AND DEMOLITION WASTES (INCLUDING EXCAVATED SOIL FROM CONTAMINATED SITES)
17 04	metals (including their alloys)
17 04 11	cables other than those mentioned in 17 04 10

Addition of waste codes:

There have been no codes added to this section.

Table S2.6 (Permitted Waste types and quantities for Hazardous Waste Transfer Station)

Removal of waste codes:

The following codes have been removed as they are non-hazardous and have been located in Table S2.7 (Non-Hazardous Waste Transfer Station)

Waste code	Description
10	WASTES FROM THERMAL PROCESSES
10 11	wastes from manufacture of glass and glass products
16 01 17	ferrous metal
12	WASTES FROM SHAPING AND PHYSICAL AND MECHANICAL SURFACE TREATMENT OF METALS AND PLASTICS
12 01	wastes from shaping and physical and mechanical surface treatment of metals and plastics
12 01 21	spent grinding bodies and grinding materials other than those mentioned in 12 01 20
15	WASTE PACKAGING; ABSORBENTS, WIPING CLOTHS, FILTER MATERIALS AND PROTECTIVE CLOTHING NOT OTHERWISE SPECIFIED
15 01	packaging (including separately collected municipal packaging waste)
15 01 02	plastic packaging
15 01 03	wooden packaging
16 06	batteries and accumulators
16 06 04	alkaline batteries (except 16 06 03)

16 06 06	separately collected electrolyte from batteries and accumulators
17	CONSTRUCTION AND DEMOLITION WASTES (INCLUDING EXCAVATED SOIL FROM CONTAMINATED SITES)
17 02	wood, glass and plastic
17 02 01	wood
17 02 02	glass
17 02 03	plastic
17 09	other construction and demolition wastes
17 09 04	mixed construction and demolition wastes other than those mentioned in 17 09 01, 17 09 02 and 17 09 03
19	WASTES FROM WASTE MANAGEMENT FACILITIES, OFF-SITE WASTE WATER TREATMENT PLANTS AND THE PREPARATION OF WATER INTENDED FOR HUMAN CONSUMPTION AND WATER FOR INDUSTRIAL USE
19 12	wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified
19 12 05	glass
19 12 07	wood other than that mentioned in 19 12 06

The following codes have been removed, as they are more appropriately located in Table S2.3 (ELV ATF).

Waste code	Description
16	WASTES NOT OTHERWISE SPECIFIED IN THE LIST
16 01	end-of-life vehicles from different means of transport (including off-road machinery) and waste from dismantling of end-of-life vehicles and vehicle maintenance (except 13, 14, 16 06 and 16 08)
16 01 03	end-of-life tyres
16 01 04*	end-of-life-vehicles

Table S2.7 (Permitted Waste types and quantities for Non-Hazardous Waste Transfer Station)

This is a new table and incorporates all the non-haz codes taken from Table S2.6.

Waste Code	Description
10	WASTES FROM THERMAL PROCESSES
10 11	wastes from manufacture of glass and glass products
10 11 12	waste glass other than those mentioned in 10 11 11

Waste Code	Description
12	WASTES FROM SHAPING AND PHYSICAL AND MECHANICAL SURFACE TREATMENT OF METALS AND PLASTICS
12 01	wastes from shaping and physical and mechanical surface treatment of metals and plastics
12 01 21	spent grinding bodies and grinding materials other than those mentioned in 12 01 20
15	WASTE PACKAGING; ABSORBENTS, WIPING CLOTHS, FILTER MATERIALS AND PROTECTIVE CLOTHING NOT OTHERWISE SPECIFIED
15 01	packaging (including separately collected municipal packaging waste)
15 01 02	plastic packaging
15 01 03	wooden packaging
16	WASTES NOT OTHERWISE SPECIFIED IN THE LIST
16 06	batteries and accumulators
16 06 04	alkaline batteries (except 16 06 03)
16 06 06	separately collected electrolyte from batteries and accumulators
17	CONSTRUCTION AND DEMOLITION WASTES (INCLUDING EXCAVATED SOIL FROM CONTAMINATED SITES)
17 02	wood, glass and plastic
17 02 01	wood
17 02 02	glass
17 02 03	plastic
17 09	other construction and demolition wastes
17 09 04	mixed construction and demolition wastes other than those mentioned in 17 09 01, 17 09 02 and 17 09 03
19	WASTES FROM WASTE MANAGEMENT FACILITIES, OFF-SITE WASTE WATER TREATMENT PLANTS AND THE PREPARATION OF WATER INTENDED FOR HUMAN CONSUMPTION AND WATER FOR INDUSTRIAL USE
19 12	wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified
19 12 05	glass
19 12 07	wood other than that mentioned in 19 12 06
20	MUNICIPAL WASTES (HOUSEHOLD WASTE AND SIMILAR COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL WASTES) INCLUDING SEPARATELY COLLECTED FRACTIONS
20 01	separately collected fractions (except 15 01)

Waste Code	Description
20 01 34	batteries and accumulators other than those mentioned in 20 01 33

Emission limits

Changes to the emissions tables

Table S3.1 - Addition of new table – table S3.1 now refers to a reference for a pressure relief valve.

Table S3.2 - Renumbering and amending of existing table - table S3.2 now refers to a point source emission to sewer (S1) and the appropriate emission limits and monitoring requirements. The emission point S1 is identical to point 'S1' on the current permit. The existing table S3.2 (ambient air monitoring requirements) has been renumbered to S3.3 and amended.

For the monitoring of PFOA, PFOS and Deca BDE, the monitoring standard BS ISO 25101 has been added.

Table S3.2 Point source emissions to sewer, effluent treatment plant or other transfers off-site– emission limits and monitoring requirements						
Emission point ref. & location	Source	Parameter (Note 3)	Limit (incl. Unit) (Note 5)	Reference period (Note 1)	Monitoring frequency (Note 2)	Monitoring standard or method
S1 on site plan in schedule 7 emission to Blackburn Meadows Sewage Treatment Works (Yorkshire Water)	Process water and site surface water drainage	PFOA PFOS Deca BDE (Note 4)	-	--	6 monthly	BS ISO 25101

Table S3.3 - Addition of new table - table S3.3 ambient air monitoring requirements. This table was numbered as S3.2 in the current permit. The table has been amended to incorporate PM10 monitoring.

Table S3.3 Ambient air monitoring requirements				
Location or description of point of measurement	Parameter	Monitoring frequency	Monitoring standard or method	Other specifications
At a location or locations agreed in writing with the Environment Agency that will obtain	PM10 unless otherwise agreed in writing with the	Quarterly unless otherwise agreed in writing with the	The equipment shall be operated to a procedure agreed in writing with the	Monitoring equipment shall meet the MCERTS Performance Standards for Indicative

Table S3.3 Ambient air monitoring requirements				
Location or description of point of measurement	Parameter	Monitoring frequency	Monitoring standard or method	Other specifications
reliable and representative data on particulate emissions from the waste management operations.	Environment Agency.	Environment Agency.	Environment Agency. The emissions management plan must include action levels and regular review cycles with an overriding aim to reduce particulate emissions from the facility and make a comparison against UK air quality standards for PM10	Ambient Particulate Monitors or similar standard agreed in writing with the Environment Agency. The equipment shall be calibrated in accordance with the manufacturer's recommendations or as otherwise agreed with the Environment Agency. The system must be managed and maintained by suitably trained personnel. The system must obtain representative data that must accurately reflect PM10 levels produced by the site's activities.

Monitoring

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

For sewer:

- Hydrocarbon oil index
- Cadmium
- Chromium
- Copper
- Lead
- Nickel
- Zinc
- Mercury
- PFOA
- PFOS
- Deca BDE

For Process Monitoring:

- For each WEEE stream treated mechanically: LDA - Mass balance

We made these decisions in accordance with Best Available Techniques for Waste Treatment.

Reporting

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

- Emissions to water
- Process monitoring

We made these decisions in accordance with Best Available Techniques for Waste Treatment.

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.