

Permitting Decisions - Environment Agency Initiated Variation

We have issued an Environment Agency initiated variation for Redbournbury Treatment Plant operated by Veolia ES (UK) 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/BW3281IA/V006.

The permit variation was issued on 25/08/2026.

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

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:

- <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.
- [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

Key issues

We have decided to permit the treatment of non-hazardous wastes alongside hazardous waste in the physico-chemical treatment of hazardous waste activity AR1 - S5.3 A(1) (a) (ii). We have decided this is acceptable for this treatment process as the operator has confirmed that only hazardous and non-hazardous wastes that are effectively co-treated together may be used. No dilution occurs as the treatment process removes the hazardous properties of the waste. Non-hazardous waste is not used to dilute hazardous waste or its properties.

We have included reference to the 2nd RFI response provided by the operator in the Operating Techniques table S1.2 within the permit which outlines the procedures for the cotreatment of hazardous and non-hazardous waste.

Tank enclosure and abatement:

Effluent storage tanks - E1 and E2

Currently on-site storage tanks E1 and E2, which store treated effluent awaiting discharge are open topped without channelled and abated emission points to air.

Appropriate measure 6.1.1 from the Chemical waste: appropriate measures for permitted facilities guidance states '*You must contain storage tanks, silos and waste treatment plant (including shredders) to make sure you collect, extract and direct all process emissions to an appropriate abatement system for treatment before release.*'

Veolia has provided the following points to justify why these tanks provide the same level of environmental protection:

- Low volatility – The effluent has undergone treatment and therefore does not contain concentrations of volatile organic compounds (VOCs) or other volatile hazardous substances that would give rise to fugitive emissions.
- Low odour potential - The physicochemical characteristics of the stored material do not present an odour nuisance risk to the surrounding environment or sensitive receptors.
- Aqueous/non-hazardous composition – The effluent is predominantly aqueous in nature and does not contain substances classified as hazardous at concentrations that would necessitate containment measures beyond standard good practice.
- Treated effluent is stored at ambient conditions and does not undergo any heating treatment processes that would increase volatility.

Due to the explanations provided by the operator explaining the low-risk nature of this treated effluent awaiting discharge to sewer, we have agreed to permit these tanks to remain open topped.

BAT-AELs

Waste treatment activities including Physico-chemical treatment of Water-based liquid waste are required to comply with the BAT Conclusions for waste treatment.

The BAT Conclusions were published in 2018, the implementation dates for BAT AEL compliance for existing sites has now passed (4 years after issue publication of BAT Conclusions).

Our regulatory approach to indirect discharges to water is not specific to the waste treatment sector; we follow this approach when permitting any type of installation that indirectly releases polluting substances into water, following the guidance 'UK Cross-Cutting Interpretation Guidance and Permitting Advice on

the Best Available Techniques (BAT) Conclusions published under the Industrial Emissions Directive (IED) Version 2 – July 2024’.

On this basis the Environment Agency is required to insert the BAT AELs set out in the BAT Conclusions into a permit where it is determined they are appropriate. This is in line with the requirements set out in Defra’s guidance ‘Industrial emissions Directive EPR Guidance on Part A installations’ and specifically ‘Setting ELVs where Article 15(3) applies’. The BAT AEL apply on issue of a permit as the timescale of existing site compliance has passed. We have produced RPS 371 to mitigate its impact for 12 months.

We have therefore included BAT AELs into the permit in Table S3.2 which apply on issue of this permit.

These BAT AELs are subject to tables notes and condition 3.5.1 and compliance will be assessed by the Environment Agency in line with RPS 371.

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.

We issued a notice under regulation 61(1) of the Environmental Permitting (England and Wales) Regulations 2016 (a Regulation 61 Notice) on 15/11/2021 requiring the operator to provide information to confirm that the operation of their facility currently meets, or how it will subsequently meet, the standards (appropriate measures) described in our technical guidance.

The notice required that where the revised standards are not currently met, the operator should provide information that:

- Describes the techniques that will be implemented to ensure operations meet the relevant standards and by when, or
- Explains why they are not applicable to the facility in question, or
- Justifies why an alternative technique is appropriate and will achieve an equivalent level of environmental protection to the standards described in our guidance
- Confirms if they intend to cease operating any activity which would be in breach of the relevant new BAT Conclusion (BATC) after the compliance date, and the date by which they intend to cease operation;
- Confirms where there is a BAT-Associated Emission Level (BAT-AEL) specified in the BAT conclusion, with which they will not comply with by the compliance date and they wish to continue operating, they should request a derogation.

The standards described in our technical guidance are split into 7 chapters:

- General management appropriate measures
- Waste pre-acceptance, acceptance and tracking appropriate measures
- Waste storage, segregation and handling appropriate measures
- Waste treatment appropriate measures
- Emissions control appropriate measures
- Emissions monitoring and limits appropriate measures
- Process efficiency appropriate measures

We have set emission limit values (ELVs) and monitoring requirements for relevant substances in line with our technical guidance and the BAT Conclusions for Waste Treatment, unless a tighter, i.e. more stringent, limit was previously imposed and these limits have been carried forward.

The Regulation 61 notice required the operator to confirm whether they could comply with 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 14/05/2025.

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 29/08/2025, 26/09/2025, and 30/01/2026.

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	Only appropriate measures that are relevant to the operator’s on-site operations are included here and in Table S1.2 in the permit. Those appropriate measures which are not relevant to the operator’s on-site operations are not listed. <u>Chemical Waste: appropriate measures for permitted facilities:</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 pre-acceptance, acceptance and tracking appropriate measures	CC	<u>Chemical Waste: appropriate measures for permitted facilities:</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 storage, segregation and handling appropriate measures	FC	<u>Chemical Waste: appropriate measures for permitted facilities:</u> The operator confirmed that they currently meet the requirements of all appropriate measures in this section except those listed below. 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. • 4.43 – ‘You should vent bulk storage tanks and silos through abatement’. IC11a and IC11b have been included in Table S1.3 within the permit which will require the operator to submit a plan to the Environment Agency for the enclosure, extraction, and collection, installation and maintenance and operation of an abatement system for the reduction of emissions where emissions are

		present.
Waste treatment appropriate measures	FC	<u>Chemical Waste: appropriate measures for permitted facilities:</u> The operator confirmed that they currently meet the requirements of all appropriate measures in this section except those listed below. 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. • 5.1.10 – Where an emission is expected, all treatment or reactor vessels must be enclosed. Only vent them to the atmosphere via an appropriate scrubbing and abatement system (subject to explosion relief). IC11a and IC11b have been included in Table S1.3 within the permit which will require the operator to submit a plan to the Environment Agency for the enclosure, extraction, and collection, installation and maintenance and operation of an abatement system for the reduction of emissions where emissions are present.
Emissions control appropriate measures	FC	<u>Chemical Waste: appropriate measures for permitted facilities:</u> The operator confirmed that they currently meet the requirements of all appropriate measures in this section except those listed below. 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. • 6.1.1 – ‘you must contain storage tanks, silos, and waste treatment plant (including shredders) to make sure you collect, extract, and direct all process emissions to an appropriate abatement system for treatment before release.’ IC11a and IC11b have been included in Table S1.3 within the permit which will require the operator to submit a plan to the Environment Agency for the enclosure, extraction, and collection, installation, and maintenance and operation of an abatement system for the reduction of emissions where emissions are

		present.
Emissions monitoring and limits appropriate measures	CC	<u>Chemical Waste: appropriate measures for permitted facilities:</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.
Process efficiency appropriate measures	CC	<u>Chemical Waste: appropriate measures for permitted facilities:</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.
Reg 61 requirement Assessment of response received		
Soil and groundwater risk assessment	The operator has not included a site condition report in their submission. This was not required as part of the application as it was outside 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.	
Climate change	Submission of 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.	
Other Appropriate Measures		
Non-hazardous and inert waste: appropriate measures for permitted facilities	CC	The operator confirmed that they currently meet the requirements of all appropriate measures in this guidance. Compliance with the appropriate measures in this guidance has been incorporated into the varied permit through the updated operating techniques listed in Table S1.2.
Summary of other changes made to the permit as a result of our assessment of the Reg 61 response		
<u>Table S1.1</u> Removal of AR3 Section 5.4 A(1) (a) (ii) Physico-chemical	<u>Reason for change</u>	

treatment of non-hazardous waste for disposal activity by gravity separation and filter press from the permit and addition of these processes to the existing AR1 Section S5.3 A(1) (a) (ii) physico-chemical treatment of hazardous waste for disposal.	We assessed the activities on-site against RGN2 guidance: 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'. We determined that as the gravity separation and filter press processes are linear to the neutralisation reaction under AR1 and treat the same tonnage capacity, they would be more suitably permitted under the same scheduled activity under the same stationary technical unit (STU). All waste that undergoes gravity separation and filter press filtration is derived from AR1, with no new wastes being added at this stage. Therefore, a separate listed activity is not appropriate.
Addition of AR5 DAA to permit the handling and storage of raw materials on-site.	We have deemed it appropriate to include this DAA as part of the permit review process to ensure the permit more accurately reflects the operations on site. This decision was made in accordance with relevant RGN2 guidance. The inclusion of this DAA is standard in environmental permits where raw materials are being used on-site.
The addition of AR7 DAA to permit the existing abatement system on reaction tanks R1, R2, and R3.	We have deemed it appropriate to include this DAA as part of the permit review process to ensure the permit more accurately reflects the operations on site. The inclusion of this DAA is standard in environmental permits where abatement systems are in operation. This decision was made in accordance with relevant RGN2 guidance. Abatement was permitted previously; the addition of this DAA is for permitting accuracy.
The addition of AR8 DAA to permit the existing process water collection and storage.	We have deemed it appropriate to include this DAA as part of the permit review process to ensure the permit more accurately reflects the operations on site. The inclusion of this DAA is standard in environmental permits where effluent awaiting discharge is stored prior to discharge to sewer or surface water. This decision was made in accordance with relevant RGN2 guidance.
Tables S2.2, 2.3, 2.4 The reformatting of waste code tables in the permit to more accurately reflect acceptable wastes for each permitted Scheduled activity.	Table S2.2 has become solely hazardous waste codes suitable for the neutralisation and precipitation reaction under activity AR1. We have removed waste codes that explicitly refer to containing oils of some kind as these waste codes will always contain oil and will always be initially accepted onto site under activity AR3 – immiscible organic phase separation of oil. This on-site treatment process utilises a combination of hazardous and non-hazardous with compatible properties for cotreatment to facilitate the neutralisation and precipitation reactions. No dilution is taking place and any wastes used must be assessed for their suitability for this process. Table S2.3 has been included for solely non-hazardous waste codes suitable for the neutralisation and precipitation

	reaction under Activity AR1. We have removed waste codes that explicitly refer to containing oils of some kind as these waste codes will always contain oil and are not suitable for acceptance under AR1. Non-hazardous oil containing wastes are not suitable for treatment under AR3. This on-site treatment process utilises a combination of hazardous and non-hazardous with compatible properties for cotreatment to facilitate the neutralisation and precipitation reactions. No dilution is taking place and any wastes used must be assessed for their suitability for this process. Table S2.4 has been added and includes waste codes suitable for the storage of hazardous waste under activity AR2. This table contains all hazardous waste codes that can be accepted on-site. The operator has explained that wastes that do not specifically reference 'oil' in their EWC code may contain small amounts of oil they wish to recover under AR3. We accept this explanation and therefore included these wastes and deemed them suitable for treatment under AR3 when contaminated with oil. Table S2.5 has been included and covers hazardous wastes suitable for acceptance for phase separation under AR3. The operator has explained that wastes that do not specifically reference 'oil' in their EWC code may contain small amounts of oil they wish to recover under AR3. We accept this explanation for the majority of hazardous waste codes.
Table S3.1 The addition of emission points to air where these are expected in line with appropriate measures guidance. Existing emission points to air have had their conditions updated as necessary.	Emission point A1 – This emission point serves the neutralisation/precipitation tanks (R1, R2, and R3). As these treatment tanks undergo the treatment of water-based liquid wastes, the relevant BAT-AELs have been included as necessary for the following substances: TVOCs – 20 mg/m³, HCl 5 mg/m³, and Ammonia – No limit set. The abatement is a chemical absorption scrubber. Emission point A2 – This emission point remains unchanged from the previous permit iteration. Oil treatment tank emission point – This emission point is not currently present but in line with BAT and appropriate measures guidance, it may be necessary and will serve tank S1, which is used for the density separation of oil from wastes. The required limits will be HCl – 5 mg/m³, Ammonia – No limit set, and TVOCs at either 20 mg/m³. Specific abatement and location of this emission point will be determined upon the completion of IC10, IC11a and IC11b. Storage tank emission points – These emission points are not currently present but in line with BAT and appropriate measures guidance, they may be necessary as storage tanks with emissions must be abated and they will serve tanks S2, S3, S4, and A/STO. We will not be including BAT-AEL limits on this emission point as these tanks do not undergo treatment processes but will include abatement system process monitoring subject to completion of IC10, IC11a and IC11b. Specific abatement type and emission location will be determined upon the completion of IC11a and IC11b. Sludge thickener and filter press – These emission points are not currently present but in line with BAT and appropriate measures guidance, they may be necessary as treatment tanks should be abated. They will serve the sludge thickener and filter press units. The BAT-AELs for the treatment of water based liquid waste will be included.

	Specific abatement type, emission location and TVOC limit will be determined upon completion of IC10, IC11a and IC11b if abatement is determined to be necessary. The substances requiring monitoring are: TVOCs (Limit to be determined), HCl – 5 mg/m ³ and Ammonia (No limit set)
Table S3.2 Updating of substances and emission limits to bring in line with BAT expectations.	Emission point F1 – This emission point is currently labelled as S1, this has been changed to prevent confusion with storage tank S1. This emission point is the output to sewer from the treatment processes undertaken by activity AR1 – neutralisation/precipitation/filtration. As the output is from the treatment of water-based liquid waste, the relevant substances and limits have been added as required by BAT. As part of the Regulation 61 response provided by the operator, they outlined several BAT-AELs they believed did not apply. • The operator stated BTEX, AOX were not applicable as wastes containing these substances are excluded as part of the site's pre-acceptance procedure. Upon completion of IC10, which requires the production of an up-to-date emission inventory, the operator may alter the monitoring for these substances with agreement from the Environment Agency if they are found not to be present in line with Note 3 of Table S3.2. • The operator stated HOI is not applicable as the downstream treatment plant abates this pollutant. We have included Note 6 in the table to allow scope for this; however, this pollutant is still listed as it is still relevant to the treatment process. • The operator stated the monitoring frequency for Hexavalent chromium, Arsenic, and Mercury should be reduced due to the levels present in the discharge being 'below the BAT-AEL limit of 0.1 mg/l'. Note 4 and note 5 provide scope for the reduction in monitoring frequencies in the permit with written agreement from the Environment Agency.

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', Appendix 1 of RGN 2 'Interpretation of Schedule 1'

The site

The operator has provided plans which we consider to be satisfactory.

These show the extent of the site 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.

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.

IC10 – Updated emissions inventory and H1 risk assessment

This improvement condition requires the operator to produce a comprehensive inventory of emissions to air and sewer from all sources of emissions on site and to undertake a suitable H1 assessment on these emissions and submit them to the Environment Agency for assessment. This improvement condition has been included to ensure all emissions are compliant with BAT-AELs and appropriate measures guidance and that abatement techniques in place are sufficient to ensure this compliance. If the results of this assessment show abatement is insufficient and BAT-AELs are not being met, the operator must submit proposals to upgrade abatement or alter operation procedures to ensure limits will be met. If abatement is deemed necessary for sources of emissions not currently abated, IC11a and IC11b must be completed by the operator.

IC11a and IC11b – Enclosure, extraction and collection and/or abatement systems.

These joint improvement conditions require the operator to submit plans for the installation and operation of suitable extraction and abatement systems on all storage/treatment tanks shown to be producing emission from IC10 to ensure compliance with appropriate measures and BAT guidance.

IC12 – Waste storage, segregation, and handling procedures

This improvement condition requires the operator to update and submit their waste storage, segregation, and handling procedures to the Environment Agency for approval. We have included this improvement condition as currently the site is not compliant with all appropriate measures in this section of the appropriate measure guidance: [Chemical waste: appropriate measures for permitted facilities - Guidance - GOV.UK](#).

IC13 – Waste Treatment Procedures

This improvement condition requires the operator to update and submit their waste treatment procedures to the Environment Agency for approval. We have included this improvement condition as currently the site is not compliant with all

appropriate measures in this section of the appropriate measure guidance:
[Chemical waste: appropriate measures for permitted facilities - Guidance - GOV.UK.](#)

IC14 – Emissions control procedures

This improvement condition requires the operator to update and submit their waste treatment procedures to the Environment Agency for approval. We have included this improvement condition as currently the site is not compliant with all appropriate measures in this section of the appropriate measure guidance:
[Chemical waste: appropriate measures for permitted facilities - Guidance - GOV.UK.](#)

Changes to EWC codes

We have excluded the following wastes for the following reasons:

We have removed the following waste codes as we deem them unsuitable for the on-site treatment processes. The operator has agreed to their removal:

- 040103* degreasing wastes containing solvents without a liquid phase
- 050102* desalter sludges
- 050103* tank bottom sludges
- 050115* spent filter clays
- 050701* wastes containing mercury
- 060313* solid salts and solutions containing heavy metals
- 060315* metallic oxides containing heavy metals
- 060403* wastes containing arsenic
- 060404* wastes containing mercury
- 060405* wastes containing other heavy metals
- 070110* other filter cakes and spent absorbents
- 070210* other filter cakes and spent absorbents
- 070216* wastes containing hazardous silicones
- 070310* other filter cakes and spent absorbents
- 070410* other filter cakes and spent absorbents
- 070413* solid wastes containing hazardous substances
- 070510* other filter cakes and spent absorbents
- 070610* other filter cakes and spent absorbents
- 070710* other filter cakes and spent absorbents
- 090106* wastes containing silver from on-site treatment of photographic wastes
- 100104* oil fly ash and boiler dust
- 100113* fly ash from emulsified hydrocarbons used as fuel
- 100114*

- bottom ash, slag and boiler dust from co-incineration containing hazardous substances
- 100116* fly ash from co-incineration containing hazardous substances
- 100213* sludges and filter cakes from gas treatment containing hazardous substances
- 100319* flue-gas dust containing hazardous substances
- 100321* other particulates and dust (including ball-mill dust) containing hazardous substances
- 100325* sludges and filter cakes from gas treatment containing hazardous substances
- 100329* wastes from treatment of salt slags and black drosses containing hazardous substances
- 100403* calcium arsenate
- 100404* flue-gas dust
- 100405* other particulates and dust
- 100407* sludges and filter cakes from gas treatment
- 100506* sludges and filter cakes from gas treatment
- 100603* flue-gas dust
- 100607* sludges and filter cakes from gas treatment
- 100815* flue-gas dust containing hazardous substances
- 100817* sludges and filter cakes from flue-gas treatment containing hazardous substances
- 100909* flue-gas dust containing hazardous substances
- 100911* other particulates containing hazardous substances
- 101009* flue-gas dust containing hazardous substances
- 101011* other particulates containing hazardous substances
- 101115* solid wastes from flue-gas treatment containing hazardous substances
- 101117* sludges and filter cakes from flue-gas treatment containing hazardous substances
- 101119* solid wastes from on-site effluent treatment containing hazardous substances
- 101209* solid wastes from gas treatment containing hazardous substances
- 101312* solid wastes from gas treatment containing hazardous substances
- 101401* waste from gas cleaning containing mercury
- 110116* saturated or spent ion exchange resins
- 110202* sludges from zinc hydrometallurgy (including jarosite, goethite)
- 110503* solid wastes from gas treatment Remove 110504* spent flux
- 120118* metal sludge (grinding, honing and lapping sludge) containing oil
- 120120* spent grinding bodies and grinding materials containing hazardous substances
- 130501* solids from grit chambers and oil/water separators
- 160606* separately collected electrolyte from batteries and accumulators

- 160802* spent catalysts containing hazardous transition metals or hazardous transition metal compounds
 - 170503* soil and stones containing hazardous substances
 - 170505* dredging spoil containing hazardous substances
 - 170507* Track ballast containing hazardous substances
 - 190105* filter cake from gas treatment
 - 190107* solid wastes from gas treatment
 - 190110* spent activated carbon from flue-gas treatment
 - 190113* fly ash containing hazardous substances
 - 190115* boiler dust containing hazardous substances
 - 190117* pyrolysis wastes containing hazardous substances
 - 190402* fly ash and other flue-gas treatment wastes
 - 190403* non-vitrified solid phase
 - 190808* membrane system waste containing heavy metals
 - 191211* other wastes (including mixtures of materials) from mechanical treatment of waste containing hazardous substances
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- 010308 dusty and powdery wastes other than those mentioned in 01 03 07
 - 010409 waste sand and clays
 - 010507 barite-containing drilling muds and wastes other than those mentioned in 01 05 05 and 01 05 06
 - 010508 chloride-containing drilling muds and wastes other than those mentioned in 01 05 05 and 01 05 06
 - 020107 wastes from forestry
 - 020109 agrochemical waste other than those mentioned in 02 01 08
 - 020302 wastes from preserving agents
 - 020304 materials unsuitable for consumption or processing
 - 020401 soil from cleaning and washing beet
 - 020402 off-specification calcium carbonate
 - 020602 wastes from preserving agents
 - 020704 materials unsuitable for consumption or processing
 - 030309 lime mud waste
 - 030310 fibre rejects, fibre-, filler- and coating-sludges from mechanical separation
 - 040104 tanning liquor containing chromium
 - 040106 sludges, in particular from on-site effluent treatment containing chromium
 - 040109 wastes from dressing and finishing
 - 040210 organic matter from natural products (for example grease, wax)
 - 040215 wastes from finishing other than those mentioned in 04 02 14
 - 040217 – dyestuffs and pigments other than those mentioned in 04 02 14
 - 050702 wastes containing sulphur

- 060314 solid salts and solutions other than those mentioned in 06 03 11 and 06 03 13
- 060904 calcium-based reaction wastes other than those mentioned in 06 09 03
- 061101 calcium-based reaction wastes from titanium dioxide production
- 070217 wastes containing silicones other than those mentioned in 07 02 16
- 080318 waste printing toner other than those mentioned in 08 03 17
- 100101 bottom ash, slag and boiler dust (excluding boiler dust mentioned in 10 01 04)
- 100102 coal fly ash
- 100103 fly ash from peat and untreated wood
- 100105 calcium-based reaction wastes from flue-gas desulphurisation in solid form
- 100115 bottom ash, slag and boiler dust from co-incineration other than those mentioned in 10 01 14
- 100117 fly ash from co-incineration other than those mentioned in 10 01 16
- 100124 sands from fluidised beds
- 100125 wastes from fuel storage and preparation of coal-fired power plants
- 100214 sludges and filter cakes from gas treatment other than those mentioned in 10 02 13
- 100215 other sludges and filter cakes
- 100305 waste alumina
- 100320 flue-gas dust other than those mentioned in 10 03 19
- 100322 other particulates and dust (including ball-mill dust) other than those mentioned in 10 03 21
- 100326 sludges and filter cakes from gas treatment other than those mentioned in 10 03 25
- 100330 wastes from treatment of salt slags and black drosses other than those mentioned in 10 03 29
- 100604 other particulates and dust
- 100704 other particulates and dust
- 100705 sludges and filter cakes from gas treatment
- 100804 particulates and dust
- 100816 flue-gas dust other than those mentioned in 10 08 15
- 100818 sludges and filter cakes from flue-gas treatment other than those mentioned in 10 08 17
- 100910 flue-gas dust other than those mentioned in 10 09 09
- 100912 other particulates other than those mentioned in 10 09 11
- 101010 flue-gas dust other than those mentioned in 10 10 09
- 101012 other particulates other than those mentioned in 10 10 11
- 101105 particulates and dust

- 101114 glass-polishing and -grinding sludge other than those mentioned in 10 11 13
- 101116 solid wastes from flue-gas treatment other than those mentioned in 10 11 15
- 101118 sludges and filter cakes from flue-gas treatment other than those mentioned in 10 11 17
- 101120 solid wastes from on-site effluent treatment other than those mentioned in 10 11 19
- 101203 particulates and dust
- 101205 sludges and filter cakes from gas treatment
- 101210 solid wastes from gas treatment other than those mentioned in 10 12 09
- 101306 particulates and dust (except 10 13 12 and 10 13 13)
- 101307 sludges and filter cakes from gas treatment
- 101311 wastes from cement-based composite materials other than those mentioned in 10 13 09 and 10 13 10
- 101313 solid wastes from gas treatment other than those mentioned in 10 13 12
- 120121 spent grinding bodies and grinding materials other than those mentioned in 12 01 20
- 160801 spent catalysts containing gold, silver, rhenium, rhodium, palladium, iridium or platinum (except 16 08 07)
- 170504 soil and stones other than those mentioned in 17 05 03
- 170506 dredging spoil other than those mentioned in 17 05 05
- 170508 track ballast other than those mentioned in 17 05 07
- 190114 fly ash other than those mentioned in 19 01 13
- 190116 boiler dust other than those mentioned in 19 01 15
- 190210 combustible wastes other than those mentioned in 19 02 08 and 19 02 09
- 190604 digestate from anaerobic treatment of municipal waste
- 190606 digestate from anaerobic treatment of animal and vegetable waste
- 190904 spent activated carbon
- 190905 saturated or spent ion exchange resins
- 191302 solid wastes from soil remediation other than those mentioned in 19 13 01
- 200125 edible oil and fat
- 200203 other non-biodegradable wastes

We have restricted the following wastes for the following reasons

11 01 98* - we have restricted this waste code to 'acid and alkalines only' to ensure only wastes appropriate for the on-site treatment processes are being accepted for processing.

Emission limits

Emission Limit Values (ELV's) and equivalent parameters or technical measures, based on Best Available Techniques – Associated Emission Levels (BAT-AELS) for Waste Treatment, have been added/amended for the following substances:

Emission point A1:

Total Volatile Organic Compounds (TVOCs) – 20 mg/m³

Hydrogen Chloride (HCl) – 5 mg/m³

These emission limits have been added to emission point A1 to ensure emissions from this treatment tank are in line with relevant guidance and BAT-AELs for treatment of water-based liquid waste.

Oil treatment tank S1 emission point:

Abatement for this emission point to be determined upon completion of IC11a and IC11b. The following limits will be applicable.

TVOCs – 20 mg/m³

Hydrogen Chloride (HCl) – 5 mg/m³

Ammonia (NH₃) – No limit set

Storage tank emission points:

Abatement for these emission points to be determined upon completion of IC11a and IC11b.

No emission limits to be set on these emission points. Process monitoring of abatement as outlined in Table S3.4 in the permit.

Sludge thickener and filter press emission points:

Abatement for these emission points to be determined upon completion of IC11a and IC11b. The following limits will be applicable.

TVOCs – 20 mg/m³

Hydrogen Chloride (HCl) – 5 mg/m³

Ammonia (NH₃) – No limit set

Emissions limits have been added and amended for indirect emissions to sewer as a result of this variation based on Best Available Techniques – Associated Emission Levels (BAT-AELS) for Waste Treatment.

Emission point F1

When discharging uncontaminated site surface run-off:

- Oil and grease – none visible

When discharging process effluent from the treatment of water-based liquid waste:

Added limits:

- Arsenic – 0.1 mg/l
- Hexavalent Chromium – 0.1 mg/l
- Manganese – No limit set.
- Hydrocarbon oil index (HOI) – 10 mg/l
- Free cyanide – 0.1 mg/l
- Adsorbable organically bound halogens (AOX) – 1 mg/l
- Benzene, toluene, ethylbenzene, xylene (BTEX) – No limit set
- PFOA – No limit set
- PFOS – No limit set

Amended limits:

- Cadmium – 0.1mg/l. Limit in previous permit was 0.2 mg/l
- Chromium – 0.3 mg/l. Limit in previous permit was 4.0 mg/l
- Copper – 0.5 mg/l. Limit in previous permit was 3.0 mg/l
- Lead – 0.3 mg/l. Limit in previous permit was 3.0 mg/l
- Mercury – 10 µg/l. Limit in previous permit was 50 µg/l
- Nickel – 1 mg/l. Limit in previous permit was 4.0 mg/l
- Zinc – 2 mg/l. Limit in previous permit was 7.0 mg/l

Monitoring

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

Emission point A1

- TVOCs
- HCl

- Ammonia (NH₃)

The emissions from A1 will be subject to monitoring and abatement requirements that are in line with relevant guidance for treatment of water-based liquid waste.

Emission point A3

- TVOCs
- HCl
- Ammonia (NH₃)

The emissions from A3 will be subject to monitoring and abatement requirements that are in line with relevant guidance for treatment of water-based liquid waste.

Emission points A4, A5, A6, and A7

- Process monitoring of abatement required as specified in Table S3.4 in the permit. No substance limits set.

Emission points A8 and A9

- TVOCs
- HCl
- Ammonia (NH₃)

The emissions from A8 and A9 will be subject to monitoring and abatement requirements that are in line with relevant guidance for treatment of water-based liquid waste.

Emission point F1

When discharging uncontaminated site surface water monitoring for oil and grease will be applicable.

When discharging treatment process effluent from the treatment of water-based liquid wastes, monitoring for the following substances have been added/amended:

- Arsenic
- Hexavalent Chromium
- Manganese

- Hydrocarbon oil index (HOI)
- Free cyanide
- Adsorbable organically bound halogens (AOX)
- Benzene, toluene, ethylbenzene, xylene (BTEX)
- PFOA
- PFOS
- Cadmium
- Chromium
- Copper
- Lead
- Mercury
- Nickel
- Zinc

These monitoring requirements have been included in order to ensure the appropriate operation of required abatement systems and BAT-AEL limits are complied with as outlined in Chemical waste: appropriate measures for permitted facilities guidance.

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

We have updated the monitoring standards for existing parameters for emissions to sewer and monitoring standards for borehole monitoring. M18 methodology has been withdrawn and no longer exists, therefore has been replaced with the updated guidance, Monitoring discharges to water: CEN, ISO, British Standard and SCA

Reporting

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

- Reporting for emissions to air.
- Process monitoring for abatement systems as outlined in Table S3.4

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.