

Permitting Decisions- Environment Agency Initiated Variation

We have decided to issue an Environment Agency initiated variation for 3R Technology UK Limited operated by 3R Technology 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/TP3602SH/V003.

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 WEEE treatment and transfer, 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 been done, it also modernises the entire permit to reflect the conditions contained in our current generic permit template.

Permit variation application

In addition to implementing the permit review, this variation also makes the following changes to the permit that were applied for by the operator under permit variation application EPR/TP3602SH/V004:

- Addition of a Section 5.3 Part A(1)(a)(ii) activity for mechanical treatment of small mixed WEEE (AR2). The operator has confirmed only pre-treated and depolluted WEEE shall be accepted.
- Addition of a second Section 5.3 Part A(1)(a)(ii) activity for shredding and density separation of hazardous plastics (AR3).
- Extension of the installation boundary to include emission point W1, shown on the site plan in Schedule 7.
- Addition of the following waste code for treatment of non-hazardous plastics (AR7):
 - 19 12 04
- Addition of the following waste codes for mechanical treatment of SMW (AR2) and hazardous waste storage (AR4):
 - 16 02 10*
 - 19 10 05*
 - 19 10 06
 - 20 01 35*
 - 20 01 36

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

Storage of hazardous waste

The operator proposed that any hazardous waste that is not stored inside the building will be stored in ZAPP shelters. Measure 16 of section 4.1 of the WEEE appropriate measures requires all hazardous and POPs waste to be stored in weatherproof covering to prevent contamination of surface water. ZAPP shelters are not fully enclosed and therefore are not weatherproof as rain can enter through the front of the shelter. In order to prevent contamination of surface water the operator has confirmed that all hazardous waste stored inside the ZAPP shelters will be sealed in bulk bags and further enclosed within protective polythene wrapping. This has been incorporated into Table S1.2 of the permit. A raised floor bund will be installed across the entrance of the storage shelters to ensure that any water that does potentially become contaminated is held within the shelter. The water within the bund will be tankered off site for treatment or disposal. An improvement condition (IC4) has been included in the permit to address this.

Emissions inside the building

There are no point-source emissions to external air from onsite treatment processes. However, there are two extraction and abatement systems (emission points A1 and A2 on the site plan in Schedule 7) that discharge inside the building. Table S3.2 includes monitoring of these internal emissions to ensure they remain below the thresholds expressed in Table S3.2 of the permit. Emission points A1 and A2 currently lack suitable sampling points for monitoring, which is addressed through Improvement Condition 3 in the varied permit.

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 13th July 2022 our WEEE (waste electrical and electronic equipment) appropriate measures guidance was published on gov.uk.

This technical guidance explains the standards (appropriate measures) that are relevant to regulated facilities with an environmental permit to treat or transfer WEEE (including WTEE) and incorporates the relevant requirements of the BAT Conclusions.

We issued a notice under regulation 61(1) of the Environmental Permitting (England and Wales) Regulations 2016 (a Regulation 61 Notice) on 20/04/2022 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 treatment of WEEE.

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

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 response from the Operator was received on 06/04/2023 for activities relating to treatment of WEEE.

We considered that the response did contain sufficient information for us to commence determination of the permit review.

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 and the operator provided further information on 22/06/2026. We made a copy of this information available on our public register.

The information provided by the operator included:

- Maximum daily processing capacities of the processing lines;
- Process flows;
- Confirmation that process water is recirculated; and
- Uncontaminated surface water is discharged to Savick Brook.

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	The operator confirmed that they currently meet the requirements of all appropriate measures in this section, in their response to the Regulation 61 notice for treatment of WEEE. 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	The operator confirmed that they currently meet the requirements of all appropriate measures in this section, in their response to the Regulation 61 notice for treatment of WEEE. 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	The operator confirmed that they currently meet the requirements of the appropriate measures in this section with the exception of Appropriate Measure 16 of Section 4.1, which requires all hazardous waste to be stored in weatherproof covering to prevent contamination of surface water. The operator proposed an alternative measure, where hazardous waste is stored within ZAPP shelters which are open at the front. The waste is wrapped in polythene covering to prevent contact with rainwater. A raised floor bund will be installed across the front of the shelters to ensure any rain ingress which could potentially become contaminated does not come into contact with surface water. This has been accepted and incorporated into Table S1.2. An improvement condition (IC4) has been included in the varied permit to ensure the raised floor bund is installed within 3 months of permit issue. 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.
Waste treatment appropriate measures	CC	The operator confirmed that they currently meet the requirements of all appropriate measures in this section, in their response to the Regulation 61 notice for treatment of WEEE. 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.
Emissions control appropriate measures	CC	The operator confirmed that they currently meet the requirements of all appropriate measures in this section, in their response to the Regulation 61 notice for treatment of WEEE. 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.
Emissions monitoring and limits appropriate measures	FC	The operator confirmed that they currently meet the requirements of the appropriate measures in this section with the exception of Section 7.2, which requires an emissions inventory for point source emissions to water. An improvement condition (IC2) has been included in the varied permit to address this. 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.
Process efficiency appropriate measures	CC	The operator confirmed that they currently meet the requirements of all appropriate measures in this section, in their response to the Regulation 61 notice for treatment of WEEE. 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	A site condition report has been submitted which was carried out in June 2020, which does not include the extra portion of land around emission point W1 that has been added to the site boundary in the permit variation. The operator has accepted that: - as the 2020 baseline report did not include this additional area, the baseline level of pollution for this section of land is assumed to be zero, with any level of pollution above that requiring remediation to return to its baseline level on surrender of the permit; - that any pollution identified within this additional area upon surrender of the permit could therefore be considered the responsibility of the operator to investigate and, where necessary, remediate.	
Medium combustion plant and specified generators	N/A	
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.	
Summary of other changes made to the permit as a result of our assessment of the Reg 61 response		
Change	Reason for change	

Table S1.1, Activities	There are multiple changes to Table S1.1 Permitted Activities as a result of the review: • The limits of AR1 have been updated to include details on storage requirements, storage duration and processing capacities. • The limits of AR4 have been updated to include maximum storage capacities and battery storage requirements. • The Directly Associated Activity (DAA) AR6 has been added for raw material storage and handling. • The DAA for storage of waste prior to treatment has been removed, as this is covered by AR4 for hazardous waste storage. • The waste operation AR7 for treatment of non-hazardous plastics has been added to reflect the mechanical treatment of non-hazardous plastic on the site.
Change to the Tables S1.2, S1.3, S1.4 and S1.5	• 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. • Table S1.5 (improvement programme requirements) has been updated with improvement condition IC2. Improvement condition IP1 has been removed as process monitoring requirements have been incorporated into Table S3.2.
Changes to schedule 2	• There are now 4 tables of permitted waste types to reflect the waste types suitable for each activity.
Changes to Schedule 3	• Table S3.1 has been amended to reflect uncontaminated discharge to surface water via emission point W1. • Table S3.2 has been added to include the current process monitoring requirements for treatment of WEEE and plastic separation processes.
Changes to Schedule 4	• Schedule 4 has been updated to reflect the changes made to Schedule 3 and the way the conditions have been presented has altered slightly.
Changes to Schedule 7	• The installation boundary has been extended to include the monitoring point for emissions to water (W1). • Site plan has been updated to include the emission points A1, A2 and W1.

Variation application made by operator

This section summarises the key issues that we considered in relation to permit variation application EPR/TP3602SH/V004, which was made by the operator on 12/05/2026 and separate to the permit review detailed above.

Mechanical treatment of WEEE

The operator confirmed that all WEEE accepted for mechanical treatment on site will have been depolluted prior to arrival. Any WEEE that arrives on site which has not been pre-dismantled will be isolated and treated as non-conforming waste. This is stated in section 9 of the Environmental Management System and has been incorporated into Table S1.2 of the permit.

Emissions inside the building

There are no point-source emissions to air from onsite treatment processes. However, there are two extraction and abatement systems:

- Emission point A1 on the site plan in Schedule 7, which extracts and abates air from activities AR2 and AR3; and
- Emission point A2 on the site plan in Schedule 7, which extracts air from activity AR1.

Both A1 and A2 discharge inside the building. Table S3.2 includes monitoring of these internal emissions to ensure they remain within acceptable levels. Emission points A1 and A2 currently lack suitable sampling points for monitoring, which is addressed through Improvement Condition 3 in the varied permit.

Decision Considerations

Confidential information

A claim for commercial or industrial confidentiality has not been made.

The decision was taken in accordance with our guidance on confidentiality.

Identifying confidential information

We have not identified information provided as part of the application that we consider to be confidential.

The decision was taken in accordance with our guidance on confidentiality.

The regulated facility

We considered the extent and nature of the facility at the site in accordance with RGN2 'Understanding the meaning of regulated facility', Appendix 2 of RGN2 'Defining the scope of the installation', Appendix 1 of RGN 2 'Interpretation of Schedule 1', guidance on waste recovery plans and permits.

The extent of the facility is defined in the site plan and in the permit. The activities are defined in table S1.1 of the permit.

The site

The operator has provided 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.

Nature conservation, landscape, heritage and protected species and habitat designations

We have checked the location of the application to assess if it is within the screening distances we consider relevant for impacts on nature conservation, landscape, heritage and protected species and habitat designations. The application is within our screening distances for these designations.

The annual throughput of the site is remaining at 25,000 tonnes per annum, and the type of waste stream being accepted for treatment is not changing as a result of this application. All emissions are abated and enclosed within the building so there is no pathway for direct point source emissions to air, and only uncontaminated water is discharged to surface water. Fugitive emissions that

may exit via building openings have been considered within the Environmental Management Plan, extraction and abatement of equipment, and processing monitoring required under Table S3.2 of the permit.

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

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

We have not consulted Natural England.

The decision was taken in accordance with our guidance.

Environmental risk assessment

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

The operator's risk assessment is satisfactory.

The emissions to air are all contained within the building; however fugitive emissions could escape through open doorways; therefore process monitoring has been included in Table S3.2 to ensure the effectiveness of the extraction and abatement system from emission points A1 and A2.

Operating techniques

We have reviewed the techniques used by the operator and compared these with the relevant guidance notes and we consider them to represent appropriate techniques for the facility.

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

Changes to the permit conditions

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

Fire Prevention plan

We have assessed the fire prevention plan and are satisfied that it meets the measures and objectives set out in the Fire Prevention Plan guidance subject to the requirements below.

We have set an improvement programme which requires the operator to install the firewalls, thermal CCTV cameras and automatic fire extinguishers as described in their Fire Prevention Plan within 3 months of permit issue.

We have approved the Fire Prevention Plan as we consider it to be appropriate measures based on information available to us at the current time. The applicant should not take our approval of this plan to mean that the measures in the plan are considered to represent all appropriate measures covering every circumstance throughout the life of the permit.

This plan has been incorporated into the operating techniques Table S1.2 of the permit.

Dust management

We have reviewed the dust and emission management plan in accordance with our guidance on emissions management plans for dust.

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

We have approved the dust and emission management plan as we consider it to be appropriate measures based on information available to us at the current time. The applicant should not take our approval of this plan to mean that the measures in the plan are considered to cover every circumstance throughout the life of the permit.

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

This plan has been incorporated into the operating techniques Table S1.2 of the permit.

Waste types

We have specified the permitted waste types, descriptions and quantities, which can be accepted at the regulated facility.

We are satisfied that the operator can accept these wastes for the following reasons:

- they are suitable for the proposed activities
- the proposed infrastructure is appropriate; and

- the environmental risk assessment is acceptable.

We have restricted the following wastes to 'plastic only' and 'pure fractions only' for rubber as the waste operation AR7 is for the mechanical treatment of non-hazardous plastic waste only.

Table S2.5:

16 02 16	components removed from discarded equipment other than those mentioned in 16 02 15 [limited to plastic casings]
19 12 04	plastic and rubber [pure fractions only]
19 12 12	other wastes (including mixtures of materials) from mechanical treatment other than those mentioned in 19 12 11 [output materials consisting of or containing predominately plastics only]

We made these decisions with respect to waste types in accordance with Best Available Techniques for Waste Treatment.

Improvement programme

We have included an improvement programme to ensure that the permit complies with the Waste Electrical and Electronic Equipment (WEEE): Appropriate Measures for Permitted facilities guidance.

- Improvement condition IP1 has been removed as process monitoring requirements have now been incorporated into Table S3.2.
- Improvement condition IC2 has been added which requires the operator to provide monitoring results, comparison with applicable limits, an H1 environmental assessment, and, where necessary, proposals for revised ELVs and mitigation, including an emissions inventory for point source emissions to water.
- Improvement condition IC3 has been added which requires the operator to review and update their emissions control procedures, ensuring there is a review of existing sampling arrangements to ensure a representative sample can be obtained in line with MCERTS monitoring standards from emission points A1 and A2 inside the building. If not, new internal or external sampling points will be required to accommodate MCERTS.
- Improvement condition IC4 has been added which requires the operator to install raised floor bunds in front of the ZAPP shelters storing hazardous waste in accordance with what is described in their Environmental Management System, within the approved timescale.

- Improvement Condition IC5 has been added which requires the operator to install firewalls in accordance with drawing 2 from their Fire Prevention Plan, within the approved timescale.
- Improvement condition IC6 has been added which requires the operator to instal thermal CCTV cameras and automatic fire extinguishers in accordance with drawing 8 from their Fire Prevention Plan, within the approved timescale.

Emission limits

Emissions limits have been added as a result of this variation. It is considered that the descriptive limits described below will prevent significant deterioration of receiving waters.

Emission point ref. & location	Source	Parameter (Note 3)	Limit (incl. unit)	Reference Period (Note 1)	Monitoring frequency (Note 2) (Note 4)	Monitoring standard or method
W1 on site plan in schedule 7 emission to Savick Brook	Uncontaminated site source water from roofs and non-operational areas via an oil interceptor	Oil or grease	None visible	--	Daily	Visual assessment

We have included these limits on visible oil and grease based on the relevant aspects of 'no deterioration' policy.

Monitoring

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

- Each WEEE stream treated mechanically – mass balance;
- Finest non-metallic fraction from mechanical treatment of SMW, IT, telecommunications or business equipment – mercury and cadmium;
- Plastic separation processes – total bromine, antimony, lead, zinc, and brominated flame retardants;
- Process separation efficiency;
- Emissions from A1 and A2 – dust, metals (As, Cd, Co, Cr, Cu, Mn, Ni, Pb, Sb, Se, Ti, V), total VOCs, brominated flame retardants, dioxin-like polychlorinated biphenyls, dioxins and furans; and
- Filter units attached to Local Extraction Vents serving AR1, AR2 and AR3 – pressure difference.

These monitoring requirements have been included in order to comply with the requirements of the BAT conclusions for the sector and meet current requirements for the industry.

We made these decisions in accordance with Best Available Techniques for Waste Treatment and the 'WEEE: appropriate measures for permitted facilities' guidance.

Based on the information in the application we are not fully satisfied that the operator's techniques, personnel and equipment have either MCERTS certification or MCERTS accreditation as appropriate. Process monitoring for emissions released inside a building has not previously been required so no monitoring from A1 or A2 has been carried out. Improvement condition IC3 has been included in the permit to address the physical suitability of A1 and A2 sampling locations and procedures, as well as Condition 3.5.3 that addresses MCERTS competence and certification.

Reporting

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

Table S4.1 Reporting of monitoring data			
Parameter	Emission or monitoring point/reference	Reporting period	Period begins
Emissions to water Parameters as required by condition 3.5.1	W1	Every 6 months, or as agreed in writing by the Environment Agency.	1 January, 1 July
Process monitoring Parameters as required by condition 3.5.1	A1, A2, and any additional emission point installed under IC3 As agreed in writing by the Environment Agency.	Every 6 months, or as agreed in writing by the Environment Agency.	1 January, 1 July
Process monitoring Parameters as required by condition 3.5.1 WEEE plastics process efficiency separation and SMW mass balance	As agreed in writing by the Environment Agency.	Annually, or as agreed in writing by the Environment Agency.	1 January

Table S4.1 Reporting of monitoring data			
Parameter	Emission or monitoring point/reference	Reporting period	Period begins
Process monitoring Parameters as required by condition 3.5.1 WEEE (chemical analysis)	As agreed in writing by the Environment Agency.	Every 6 months, or as agreed in writing by the Environment Agency.	1 January, 1 July

Table S4.2 Annual production/treatment	
Parameter	Units
WEEE treated	tonnes
Ferrous metal recovered	tonnes
Non-ferrous metal recovered	tonnes
Other fractions recovered	tonnes
Non-metallic shredder residue	tonnes

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.

Consultation Responses

The following summarises the responses to consultation with other organisations, our notice on GOV.UK for the public, newspaper advertising and the way in which we have considered these in the determination process.

Responses from organisations:

Response received from UK Health Security Agency (UKHSA).

Brief summary of issues raised:

- Increase in fugitive dust emissions;
- Increased risk of fire associated with storage of combustible waste on the site;
- Concerns regarding the acceptance of additional waste streams containing asbestos and refrigerant gases.

Summary of actions taken:

- A Fire Prevention Plan and Emissions Management Plan have been assessed and approved and incorporated into the operating techniques of the permit (Table S1.2).
- The operator reviewed the waste codes they had requested and confirmed that EWC codes for wastes containing asbestos or refrigerant gases were no longer required on the permit and have therefore been removed or withdrawn.

Representations from individual members of the public

Brief summary of issues raised:

- Acceptance of batteries;
- Dust and fugitive emissions;
- Surface water, flood water and firewater controls;
- Maximum storage capacities and ensuring these are not exceeded;
- Acceptance and handling of hazardous waste.

Summary of actions taken:

- Batteries are not included in Schedule 2 and therefore cannot be accepted on site as an individual waste type. The operator confirmed all WEEE accepted on site shall be depolluted, including removal of all external (including powerpacks) and internal batteries designed to be accessible by the user. If batteries, or any other non-conforming item, is found within the waste it will be isolated and treated as non-conforming waste. This is stated in section 9 of the Environmental Management System and the operating techniques of the permit (Table S1.2). Any non-conforming waste which requires temporary storage prior to removal off site, must be stored in compliance with the WEEE appropriate measures.
- An Emissions Management Plan has been approved. Monitoring emissions from emission points A1 and A2 (which release inside the building) has been addressed through Table S3.2 of the permit (process monitoring requirements).
- The operator has confirmed that there shall be no contamination of surface water. All hazardous waste storage is within ZAPP shelters as an alternative measure. This is addressed within the key issues section of this document.
- A Fire Prevention Plan has been approved and incorporated into the operating techniques (Table S1.2) of the permit. This states that surface water drainage can be locked off in the event of a fire and there is sufficient containment on site to hold the volume of firewater required to extinguish a fire from the largest waste pile.
- Maximum storage capacities have been listed in Table S1.1 of the permit. The operator has confirmed compliance or future compliance with all sections of the WEEE appropriate measures, including waste pre-acceptance, acceptance and tracking, and storage, segregation and handling.