

Permit with introductory note

The Environmental Permitting (England & Wales) Regulations 2010

Roydon Bottle Recycling Limited

Roydon Bottle Recycling Ltd
Unit 1 Blackwood Business Park
Newport Road
Pontllanfraith
Blackwood
NP12 2XN

Permit number

EPR/PB3393HD

Roydon Bottle Recycling Ltd

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Introductory note

This introductory note does not form a part of the permit

The main features of the permit are as follows.

The Tier 3 bespoke regulated facility is a purpose-built plastics reprocessing plant installed within an industrial building on an industrial estate. Storage and treatment of the non-hazardous Polyethylene Terephthalate (PET) plastic waste feedstock takes place within the building on an impermeable concrete surface. Storage of feedstock may take place outside on an impermeable tarmac surface under waterproof covers. The feedstock is manually and mechanically screened to remove contaminants before being granulated and submitted to a series of washing processes including a hot caustic wash. The spent caustic wash water is neutralised using hydrochloric acid before being re-used in the initial cold wash granulation process. The cleaned plastic flake is dried and packaged in bulk bags and transported off site to be incorporated in the manufacture of food-grade packaging and other products.

The annual throughput of the facility is 25,000 tonnes.

There is an emission to air that is not subject to an emissions limit but is controlled via the emissions of substances not controlled by emission limits condition and the operator's management system.

Dirty wash water from the initial cold wash process is disposed of as trade effluent to foul sewer under a discharge consent with Dŵr Cymru Welsh Water. The only discharge to surface water is of clean rainfall dependant run off from roofs and surfaces not used for the treatment of waste.

The status log of the permit sets out the permitting history, including any changes to the permit reference number.

Status log of the permit		
Description	Date	Comments
Application EPR/PB3393HD/A001	Duly made 23/12/13	Application for a waste plastics treatment/ recycling facility.
Additional information received following an informal request for information sent on 06/02/14	11/02/14	Information relating to chemical raw materials and storage thereof, and nature of effluent produced from neutralisation of hot caustic wash water.
Additional information received following an informal request for information sent on 13/02/14	18/02/14 19/02/14	Information relating to the chemical nature of the waste water arising from the hot caustic wash process.
Additional information received following an informal request for information sent on 23/04/14	23/04/14	Information relating to management procedures governing the outside storage of waste.

Status log of the permit		
Description	Date	Comments
Permit determined EPR/PB3393HD.	09/05/14	New bespoke permit issued to Roydon Bottle Recycling Limited.

End of introductory note

Permit

The Environmental Permitting (England and Wales) Regulations 2010

Permit number

EPR/PB3393HD

Natural Resources Wales hereby authorises, under regulation 13 of the Environmental Permitting (England and Wales) Regulations 2010

Roydon Bottle Recycling Limited (“the operator”),

whose registered office is

Unit 1-3 Junction Eco Park

Rake Lane

Clifton, Swinton

Manchester

United Kingdom

M27 8LU

company registration number **08635446**

to operate waste operations at

Roydon Bottle Recycling Ltd

Unit 1 Blackwood Business Park

Newport Road

Pontllanfraith

Blackwood

NP12 2XN

to the extent authorised by and subject to the conditions of this permit.

Name	Date
Holly Noble	09/05/2014

Authorised on behalf of Natural Resources Wales

Conditions

1 Management

1.1 General management

- 1.1.1 The operator shall manage and operate the activities:
- (a) in accordance with a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances, closures and those drawn to the attention of the operator as a result of complaints; and
 - (b) using sufficient competent persons and resources.
- 1.1.2 Records demonstrating compliance with condition 1.1.1 shall be maintained.
- 1.1.3 Any person having duties that are or may be affected by the matters set out in this permit shall have convenient access to a copy of it kept at or near the place where those duties are carried out.
- 1.1.4 The operator shall comply with the requirements of an approved competence scheme.

1.2 Avoidance, recovery and disposal of wastes produced by the activities

- 1.2.1 The operator shall take appropriate measures to ensure that:
- (a) the waste hierarchy referred to in Article 4 of the Waste Framework Directive is applied to the generation of waste by the activities; and
 - (b) any waste generated by the activities is treated in accordance with the waste hierarchy referred to in Article 4 of the Waste Framework Directive; and
 - (c) where disposal is necessary, this is undertaken in a manner which minimises its impact on the environment.
- 1.2.2 The operator shall review and record at least every four years whether changes to those measures should be made and take any further appropriate measures identified by a review.

2 Operations

2.1 Permitted activities

- 2.1.1 The operator is only authorised to carry out the activities specified in schedule 1 table S1.1 (the "activities").

2.2 The site

- 2.2.1 The activities shall not extend beyond the site, being the land shown edged in green on the site plan at schedule 7 to this permit.

2.3 Operating techniques

- 2.3.1 (a) The activities shall, subject to the conditions of this permit, be operated using the techniques and in the manner described in the documentation specified in schedule 1, table S1.2, unless otherwise agreed in writing by Natural Resources Wales.
- (b) If notified by Natural Resources Wales that the activities are giving rise to pollution, the operator shall submit to Natural Resources Wales for approval within the period specified, a revision of any plans specified in schedule 1, table S1.2 or otherwise required under this permit, and shall implement the approved revised plan in place of the original from the date of approval, unless otherwise agreed in writing by Natural Resources Wales.
- 2.3.2 Waste shall only be accepted if:
- (a) it is of a type and quantity listed in schedule 2 table(s) S2.2 [, S2.3 etc]; and
- (b) it conforms to the description in the documentation supplied by the producer and holder.

3 Emissions and monitoring

3.1 Emissions of substances not controlled by emission limits

- 3.1.1 Emissions of substances not controlled by emission limits (excluding odour) shall not cause pollution. The operator shall not be taken to have breached this condition if appropriate measures, including, but not limited to, those specified in any approved emissions management plan, have been taken to prevent or where that is not practicable, to minimise, those emissions.
- 3.1.2 The operator shall:
- (a) if notified by Natural Resources Wales that the activities are giving rise to pollution, submit to Natural Resources Wales for approval within the period specified, an emissions management plan;
- (b) implement the approved emissions management plan, from the date of approval, unless otherwise agreed in writing by Natural Resources Wales.
- 3.1.3 All liquids in containers, whose emission to water or land could cause pollution, shall be provided with secondary containment, unless the operator has used other appropriate measures to prevent or where that is not practicable, to minimise, leakage and spillage from the primary container.

3.2 Odour

- 3.2.1 Emissions from the activities shall be free from odour at levels likely to cause pollution outside the site, as perceived by an authorised officer of Natural Resources Wales, unless the operator has used appropriate measures, including, but not limited to, those specified in any approved odour management plan, to prevent or where that is not practicable to minimise the odour.
- 3.2.2 The operator shall:
- (a) if notified by Natural Resources Wales that the activities are giving rise to pollution outside the site due to odour, submit to Natural Resources Wales for approval within the period specified, an odour management plan;
 - (b) implement the approved odour management plan, from the date of approval, unless otherwise agreed in writing by Natural Resources Wales.

3.3 Noise and vibration

- 3.3.1 Emissions from the activities shall be free from noise and vibration at levels likely to cause pollution outside the site, as perceived by an authorised officer of Natural Resources Wales, unless the operator has used appropriate measures, including, but not limited to, those specified in any approved noise and vibration management plan to prevent or where that is not practicable to minimise the noise and vibration.
- 3.3.2 The operator shall:
- (a) if notified by Natural Resources Wales that the activities are giving rise to pollution outside the site due to noise and vibration, submit to Natural Resources Wales for approval within the period specified, a noise and vibration management plan;
 - (b) implement the approved noise and vibration management plan, from the date of approval, unless otherwise agreed in writing by Natural Resources Wales.

3.4 Pests

- 3.4.1 The activities shall not give rise to the presence of pests which are likely to cause pollution, hazard or annoyance outside the boundary of the site. The operator shall not be taken to have breached this condition if appropriate measures, including, but not limited to, those specified in any approved pests management plan, have been taken to prevent or where that is not practicable, to minimise the presence of pests on the site.
- 3.4.2 The operator shall:
- (a) if notified by Natural Resources Wales, submit to Natural Resources Wales for approval within the period specified, a pests management plan which identifies and minimises risks of pollution, hazard or annoyance from pests;
 - (b) implement the pests management plan, from the date of approval, unless otherwise agreed in writing by Natural Resources Wales.

4 Information

4.1 Records

- 4.1.1 All records required to be made by this permit shall:

- (a) be legible;
- (b) be made as soon as reasonably practicable;
- (c) if amended, be amended in such a way that the original and any subsequent amendments remain legible, or are capable of retrieval; and
- (d) be retained, unless otherwise agreed in writing by Natural Resources Wales, for at least 6 years from the date when the records were made, or in the case of the following records until permit surrender:
 - (i) off-site environmental effects; and
 - (ii) matters which affect the condition of the land and groundwater.

4.1.2 The operator shall keep on site all records, plans and the management system required to be maintained by this permit, unless otherwise agreed in writing by Natural Resources Wales.

4.2 Reporting

4.2.1 The operator shall send all reports and notifications required by the permit to Natural Resources Wales using the contact details supplied in writing by Natural Resources Wales.

4.2.2 Within one month of the end of each quarter, the operator shall submit to Natural Resources Wales using the form made available for the purpose, the information specified on the form relating to the site and the waste accepted and removed from it during the previous quarter.

4.3 Notifications

4.3.1 Natural Resources Wales shall be notified without delay following the detection of:

- (a) any malfunction, breakdown or failure of equipment or techniques, accident, or emission of a substance not controlled by an emission limit which has caused, is causing or may cause significant pollution;
- (b) the breach of a limit specified in the permit; or
- (c) any significant adverse environmental effects.

4.3.2 Any information provided under condition 4.3.1 shall be confirmed by sending the information listed in schedule 5 to this permit within the time period specified in that schedule.

4.3.3 Where Natural Resources Wales has requested in writing that it shall be notified when the operator is to undertake monitoring and/or spot sampling, the operator shall inform Natural Resources Wales when the relevant monitoring and/or spot sampling is to take place. The operator shall provide this information to Natural Resources Wales at least 14 days before the date the monitoring is to be undertaken.

4.3.4 Natural Resources Wales shall be notified within 14 days of the occurrence of the following matters, except where such disclosure is prohibited by Stock Exchange rules:

Where the operator is a registered company:

- (a) any change in the operator's trading name, registered name or registered office address; and

- (b) any steps taken with a view to the operator going into administration, entering into a company voluntary arrangement or being wound up.

Where the operator is a corporate body other than a registered company:

- (a) any change in the operator's name or address; and
- (b) any steps taken with a view to the dissolution of the operator.

In any other case:

- (a) the death of any of the named operators (where the operator consists of more than one named individual);
- (b) any change in the operator's name(s) or address(es); and
- (c) any steps taken with a view to the operator, or any one of them, going into bankruptcy, entering into a composition or arrangement with creditors, or, in the case of them being in a partnership, dissolving the partnership.

4.3.5 Where the operator proposes to make a change in the nature or functioning, or an extension of the activities, which may have consequences for the environment and the change is not otherwise the subject of an application for approval under the Regulations or this permit:

- (a) Natural Resources Wales shall be notified at least 14 days before making the change; and
- (b) the notification shall contain a description of the proposed change in operation.

4.4 Interpretation

4.4.1 In this permit the expressions listed in schedule 6 shall have the meaning given in that schedule.

4.4.2 In this permit references to reports and notifications mean written reports and notifications, except where reference is made to notification being made "without delay", in which case it may be provided by telephone.

Schedule 1 - Operations

Table S1.1 activities

Activity reference	Description of activities for waste operations	Limits of activities
Plastic recycling activity.	R13: Storage of waste pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced) R3: Recycling/reclamation of organic substances which are not used as solvents	Non-hazardous waste may be stored within the building on an impermeable surface. Any non-hazardous waste stored outside of the building must be stored on an impermeable surface and fully covered to prevent the ingress of rainfall. All treatment of non-hazardous plastic waste must take place inside a building on an impermeable surface with sealed drainage. Treatment operations shall be limited to: - manual and/or mechanical sorting and separation - washing - granulation - repackaging/bagging of non-hazardous plastic waste for recovery. Waste types as specified in Table S2.2. All waste wash water must be stored and treated inside the building and on an impermeable surface with sealed drainage. Treatment operations for the waste hot wash water shall be limited to: - neutralisation - settlement of hot wash waste water for the purpose of recirculation/ reuse in the cold wash process. Treatment of hot wash waste water shall be carried out using the raw materials as specified in Table S2.1.

Table S1.2 Operating techniques

Description	Parts	Date Received
Application	Section 3a – technical standards, Part B4 of the application form RBR-EP-OpTech – Operating Techniques Environmental risk assessment Table A3: Fugitive emissions risk assessment and management plan, row 4 chemical additive storage and handling.	23/12/13

Table S1.2 Operating techniques		
Description	Parts	Date Received
	Environmental risk assessment Table A4: Accidents risk assessment and management plan, rows 1-5 [fire prevention].	
Additional information received following an information request sent on 13/02/14	RBR-EP-PFD – Process Flow Diagram (ref RBR042V5)	18/02/14
	Caustic Soda Calculations	19/02/14
Additional information received 23/04/14 following operator review of draft permit	Environmental Management Plan v1.3 Section 7.1 Risks and Prevention	23/04/14
	Environmental Risk Assessment RBR009 Table A1 Row 2 Malodorous feedstock storage on the yard	23/04/14
	Table A3 Row 1 Plastic fragments on yard from bales of bottles or bags of flake	
	Table A3 Row 4 Residues washed off feedstock stored on the Yard	
	Table A3 Row 5 Residues leaking out of feedstock stored on the Yard	
	Table A4 Row 19 Floodwater ingress	
Technical guidance note 'How to comply with your environmental permit'	All	n/a
Sector guidance note S5.06: Guidance for recovery and disposal of hazardous and non hazardous waste	All	n/a
Monitoring technical guidance note M17: Monitoring ambient particulates in air around waste facilities	All	n/a
Monitoring technical guidance note M18: Monitoring discharges to water and sewer	All	n/a

Schedule 2 - Waste types, raw materials and fuels

Table S2.1 Raw materials and fuels	
Raw materials and fuel description	Specification
Sodium hydroxide solution (caustic soda liquor)	As described in relevant documents incorporated in Table S1.2 or as otherwise agreed in writing with Natural Resources Wales.
Hydrochloric acid	
Anti-foaming agent	
Detergent / surfactant	

Table S2.2 Permitted waste types and quantities for storage and treatment	
Maximum quantity	The maximum quantity of waste accepted at the site shall be less than 25,000 tonnes per year.
Excluded wastes	Notwithstanding the waste types set out in this table, wastes having any of the following characteristics shall not be accepted: • consisting solely or mainly of dusts, powders or loose fibres • hazardous waste.
Waste code	Description
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
20	MUNICIPAL WASTES (HOUSEHOLD WASTE AND SIMILAR COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL WASTES) INCLUDING SEPARATELY COLLECTED FRACTIONS
20 01	separately collected fractions (except 15 01)
20 01 39	plastics

Schedule 3 – Emissions and monitoring

There are no emission limits or associated monitoring requirements.

Schedule 4 - Reporting

There is no reporting under this schedule.

Schedule 5 - Notification

These pages outline the information that the operator must provide.

Units of measurement used in information supplied under Part A and B requirements shall be appropriate to the circumstances of the emission. Where appropriate, a comparison should be made of actual emissions and authorised emission limits.

If any information is considered commercially confidential, it should be separated from non-confidential information, supplied on a separate sheet and accompanied by an application for commercial confidentiality under the provisions of the EP Regulations.

Part A

Permit Number	EPR/PB3393HD
Name of operator	Roydon Bottle Recycling Limited
Location of Facility	Unit 1 Blackwood Business Park, Newport Road, Pontllanfraith, Blackwood, NP12 2XN.
Time and date of the detection	

(a) Notification requirements for any malfunction, breakdown or failure of equipment or techniques, accident, or emission of a substance not controlled by an emission limit which has caused, is causing or may cause significant pollution

To be notified within 24 hours of detection	
Date and time of the event	
Reference or description of the location of the event	
Description of where any release into the environment took place	
Substances(s) potentially released	
Best estimate of the quantity or rate of release of substances	
Measures taken, or intended to be taken, to stop any emission	
Description of the failure or accident.	

(b) Notification requirements for the breach of a limit

To be notified within 24 hours of detection unless otherwise specified below	
Emission point reference/ source	
Parameter(s)	
Limit	
Measured value and uncertainty	
Date and time of monitoring	
Measures taken, or intended to be taken, to stop the emission	

Time periods for notification following detection of a breach of a limit	
Parameter	Notification period

(c) Notification requirements for the detection of any significant adverse environmental effect	
To be notified within 24 hours of detection	
Description of where the effect on the environment was detected	
Substances(s) detected	
Concentrations of substances detected	
Date of monitoring/sampling	

Part B - to be submitted as soon as practicable

Any more accurate information on the matters for notification under Part A.	
Measures taken, or intended to be taken, to prevent a recurrence of the incident	
Measures taken, or intended to be taken, to rectify, limit or prevent any pollution of the environment which has been or may be caused by the emission	
The dates of any unauthorised emissions from the facility in the preceding 24 months.	

Name*	
Post	
Signature	
Date	

* authorised to sign on behalf of the operator

Schedule 6 - Interpretation

“accident” means an accident that may result in pollution.

“Annex I” means Annex I to Directive 2008/98/EC of the European Parliament and of the Council on waste.

“Annex II” means Annex II to Directive 2008/98/EC of the European Parliament and of the Council on waste.

“application” means the application for this permit, together with any additional information supplied by the operator as part of the application and any response to a notice served under Schedule 5 to the EP Regulations.

“authorised officer” means any person authorised by Natural Resources Wales under section 108(1) of The Environment Act 1995 to exercise, in accordance with the terms of any such authorisation, any power specified in section 108(4) of that Act.

“building” means a construction that has the objective of providing sheltering cover and minimising emissions of noise, particulate matter, odour and litter.

“D” means a disposal operation provided for in Annex I to Directive 2008/98/EC of the European Parliament and of the Council on waste.

“emissions to land” includes emissions to groundwater.

“EP Regulations” means The Environmental Permitting (England and Wales) Regulations SI 2010 No.675 and words and expressions used in this permit which are also used in the Regulations have the same meanings as in those Regulations.

“emissions of substances not controlled by emission limits” means emissions of substances to air, water or land from the activities, either from the emission points specified in schedule 3 or from other localised or diffuse sources, which are not controlled by an emission or background concentration limit.

“groundwater” means all water, which is below the surface of the ground in the saturation zone and in direct contact with the ground or subsoil.

“hazardous waste” has the meaning given in the Hazardous Waste (England and Wales) Regulations 2005 No.894, the Hazardous Waste (Wales) Regulations 2005 No. 1806 (W.138), the List of Wastes (England) Regulations 2005 No.895 and the List of Wastes (Wales) Regulations 2005 No. 1820 (W.148).

“quarter” means a calendar year quarter commencing on 1 January, 1 April, 1 July or 1 October.

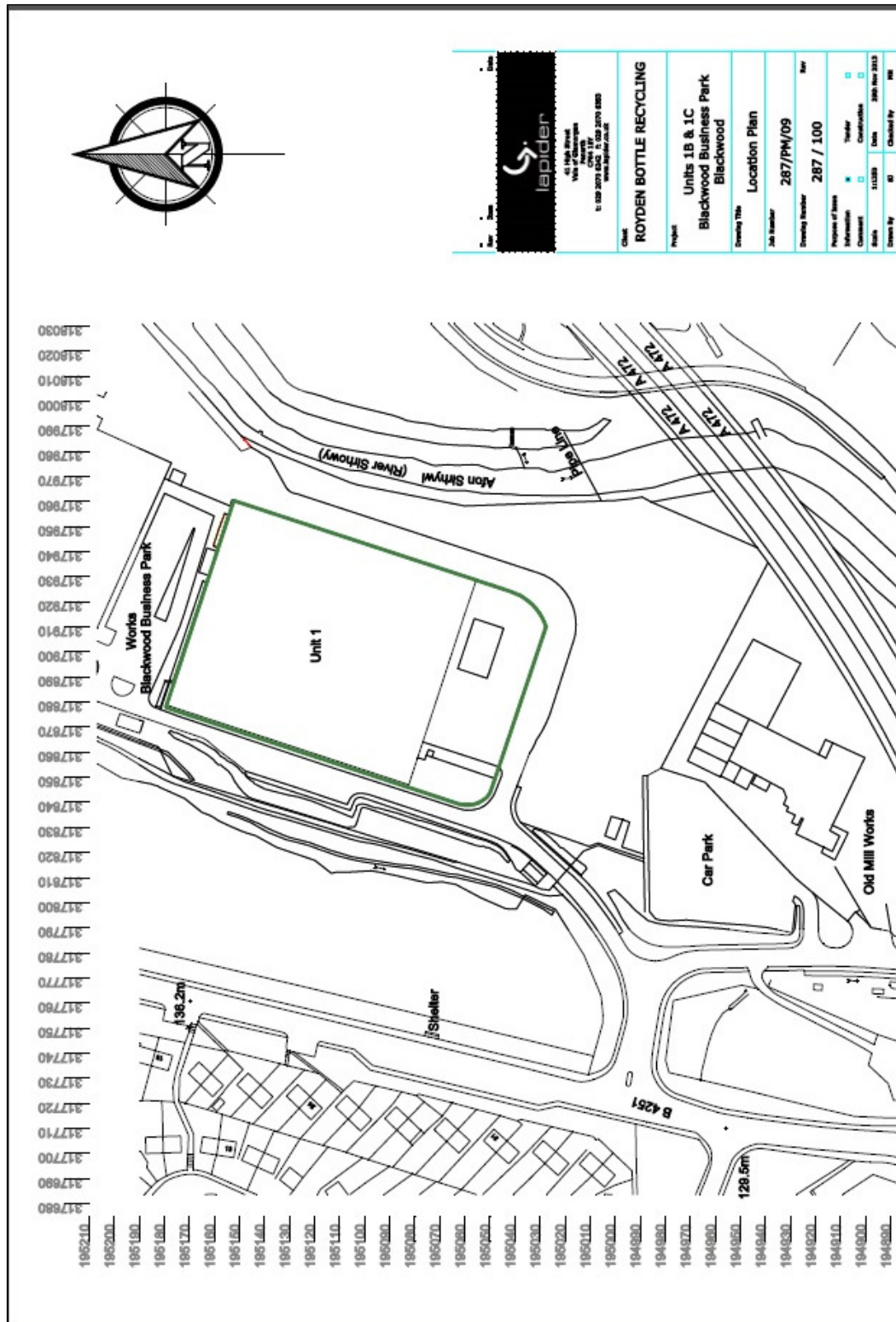
“R” means a recovery operation provided for in Annex II to Directive 2008/98/EC of the European Parliament and of the Council on waste.

“Waste code” means the six digit code referable to a type of waste in accordance with the List of Wastes (England) Regulations 2005, or List of Wastes (Wales) Regulations 2005, as appropriate, and in relation to hazardous waste, includes the asterisk.

“Waste Framework Directive” or *“WFD”* means Waste Framework Directive 2008/98/EC of the European Parliament and of the Council on waste.

“year” means calendar year ending 31 December.

Schedule 7 - Site plan



END OF PERMIT