Natural Resources Wales Permitting Decisions

# Circular Waste Solutions Limited Liquid Waste Treatment Facility

# Decision Document

# Application for a Bespoke New Permit

**The application number is: PAN-022087**

**The permit number will be: EPR/DB3295CU/A001**

**The applicant / operator is: Circular Waste Solutions Limited**

**The Installation is located at: Titanium Road, Waunarlwydd, Swansea, SA5 4SF**

## Purpose of this document

This decision document:

- explains how the application has been determined
- provides a record of the decision-making process
- shows how all relevant factors have been taken into account
- justifies the specific conditions in the permit other than those in our generic permit template.

Unless the decision document specifies otherwise, we have accepted the applicant's proposals.

## Contents

# 1. Executive summary

## 1.1. Application summary

The Installation is a hazardous liquid waste treatment facility that will accept, temporarily store, and treat approximately 32,000 tonnes per annum of both hazardous and non-hazardous liquid wastes, such as waste oils, interceptor wastes, and other hazardous liquids.

The Installation will accept bulk transfers of liquids waste and/or packaged waste from several contracted third parties, prior to treatment and transfer of filter cake and other residues offsite to other licensed waste management facilities for further processing or disposal, and effluent discharged to sewer.

## 1.2. Our decision

We have granted the permit for Liquid Waste Treatment Facility operated by Circular Waste Solutions Limited.

We consider in reaching that decision we have taken into account all relevant considerations and legal requirements and that the permit will ensure that the appropriate level of environmental protection is provided.

# 2. Receipt of the application

The application was received on 17/05/2023**.** In order for us to be able to consider the application duly made, we needed more information. We requested the following:

- details of the secondary containment proposed for the concrete tanks for final effluent, or confirmation of the details of the proposed tertiary containment system.

A letter requesting this information was sent to the applicant on 17/07/2023. Upon receipt of this information (on 26/07/2023 and 04/08/2023), we were able to consider

the application duly made as of 04/08/2023. This means we considered it was in the correct form and contained sufficient information for us to begin our determination, but not that it necessarily contained all the information we would need to complete that determination.

## 3. Confidential information

The applicant made no claim for commercial confidentiality, and we have not received information in relation to the application that appears to be confidential in relation to any party.

## 4. Legislation

The permit was granted under Regulation 13 of the EPR. The Environmental Permitting regime is a legal vehicle which delivers most of the relevant legal requirements for activities falling within its scope. In particular, the regulated facility is:

- an *installation* as described by the IED;
- subject to aspects of the Well-Being of Future Generations (Wales) Act 2015 and the Environment (Wales) Act 2016 which also have to be addressed; and
- Any other relevant legislation.

We address the legal requirements directly where relevant in the body of this document. NRW is satisfied that the decision on this application is consistent with its general purpose of pursuing the sustainable management of natural resources (SMNR) in relation to Wales and applying the principles of SMNR. In particular, NRW acknowledges that it is a principle of sustainable management to take action to prevent significant damage to ecosystems. We consider that, in granting the permit, a high level of protection will be delivered for the environment and human health through the operation of the Installation in accordance with the permit conditions. NRW is satisfied that this decision is compatible with its general purpose of pursuing the sustainable management of natural resources in relation to Wales and applying the principles of sustainable management of natural resources.

As the EPR regulator in Wales, NRW are required to determine any duly made permit application. This means that we must decide either to grant, or to refuse the variation based upon an objective assessment of the proposals against the detailed legal requirements of EPR. Our public participation statement[1] gives more information on what can, and cannot, be taken into account when making our permitting decision.

The application, and this decision document, only considers the permitting of the facility under EPR as described throughout the document. We only assess the installation and its impacts and cannot take into consideration indirect impacts which are not as a direct result of activity within the installation boundary.

Any proposed development and wider associated activities will be required to be compliant with all relevant and applicable law, for example, environmental law, health and safety law, planning law. This other legislation acts largely independently of EPR (although they may be inter-related). Such other matters are beyond both the scope of this document, and of our regulatory remit and expertise and are not relevant to our EPR permitting decision. Ensuring compliance with all other regulation and obtaining any required consents (such as planning permission) is the responsibility of those undertaking the development and is regulated by the relevant appropriate authority for each.

# 5. Consultation

## 5.1. Consultation on the Application

We have carried out consultation on the application in accordance with the Environment Permitting Regulations (EPR), our statutory Public Participation Statement (PPS) and our Regulatory Guidance.

A copy of the application is available on the public register for anyone to view. We advertised the application to the public by a notice placed on our website directing

[1] Natural Resources Wales / Public participation: how you can take part in our permit and licence consultations

people to the public register, advising them of how they could arrange for copies to be made if required and how they can provide comments.

We also consulted with the following bodies, which includes those with whom we have "Working Together Agreements":

- City and County of Swansea – Planning Department
- City and County of Swansea – Environmental Health Department
- Health and Safety Executive
- Mid and West Wales Fire and Rescue Service

These are bodies whose expertise, democratic accountability and/or local knowledge make it appropriate for us to seek their views directly.

The consultation started 24/08/2023 and ended on 22/09/2023[2].

No consultation responses were received.

### 5.2. Draft Permit Consultation

We also carried out consultation on our draft decision. This consultation began on 18/07/2024 and ended on 15/08/2024.

## 6. Requests for information

Further information was requested during determination by way of a Schedule 5 Notice requiring the applicant to provide further information relating to:

- Details of how the requirements of the Waste Treatment BRef BAT conclusions 3, 6, 7, 8 and 20 will be met for every part of these conclusions that is applicable to the proposal;
- Details of how the requirements of the Waste Treatment BRef BAT conclusion 19 are met; and

[2] The consultation with Mid and West Wales Fire and Rescue Service started on 19/01/2024 and ended on 16/02/2024

- Details of the Energy efficiency plan and the Energy balance record that will be used to meet the requirements of Waste Treatment BRef BAT conclusion 23.

The Schedule 5 Notice was sent on 14/11/2023 with a deadline for response of 28/11/2023.

The applicant's response to the Schedule 5 Notice was provided on 08/12/2023. The additional information supplied satisfied the requirements of the Schedule 5 Notice.

Due to changes to the proposals outlined in the response to the Schedule 5 Notice, we needed more information from the applicant to complete the determination. To this end, we issued a second Schedule 5 Notice on 03/01/2024, with a response date of 18/01/2024, requiring the applicant to provide:

- An updated and corrected H1 assessment; and
- An explanation of the proposed monitoring of emissions to sewer and to air.

On 19/01/2024, we agreed with the applicant to extend the timescale for response to the second Schedule 5 Notice to 19/02/2024. The applicant provided information that satisfied our request on 14/02/2024 and 19/02/2024.

A copy of the information notices and e-mails requesting further information were placed on our public register as were the responses when received.

# 7. The Installation

## 7.1. The permitted activities

The regulated facility is an installation which comprises the following activities listed in Part 2 of Schedule 1 to the Environmental Permitting Regulations:

- S5.3 Part A(1)(a)(ii) and (iii) Disposal or recovery of hazardous waste with a capacity exceeding 10 tonnes per day involving mixing, blending, bulking and physico-chemical treatment of hazardous waste; and
- S5.6 Part A(1)(a) Temporary Storage of Hazardous Waste

The regulated facility will also undertake waste operations, including:

- R3: Recycling/reclamation of organic substances which are not used as solvents; and
- R4: Recycling/reclamation of metals and metal compounds; and
- R5: Recycling/reclamation of other inorganic compounds; and
- 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); and
- D9: Physico-chemical treatment not specified elsewhere in this Annex which results in final compounds or mixtures which are discarded by means of any of the operations numbered D1 to D12 (e.g. evaporation, drying, calcination, etc.); and
- D14: Repackaging prior to submission to any of operations numbered D1 to D13; and
- D15: Storage pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where the waste is produced).

Together, these listed and directly associated activities comprise the Installation.

### 7.2. What the installation will do

The hazardous liquid waste treatment facility will accept, temporarily store, and treat approximately 32,000 tonnes per annum of both hazardous and non-hazardous liquid wastes, such as waste oils, interceptor wastes, and other hazardous liquids. The site will accept bulk transfers of liquids waste and/or packaged waste from several contracted third parties, prior to treatment and transfer of filter cake and other residues offsite to other licensed waste management facilities for further processing or disposal, and effluent discharged to sewer.

The site comprises a reception office, six storage areas for IBCs and package storage, three concrete tanks for final effluent and fire water, and a bunded tank farm area

containing dedicated treatment tanks, oil/water separator, aqueous treatment plant, effluent treatment plant, and covered storage for filter cake, as well as bunded good quality hard standing across the site. All storage of waste is external, apart from a covered storage area for oxidising and quarantined waste.

# 8. Operation of the installation

## 8.2. Operator competence

The applicant is the sole operator of the Installation. We are satisfied that the applicant is the person who will have control over the operation of the Installation after the permit is granted; and that they will be able to operate the Installation so as to comply with the conditions included in the permit, if issued. The decision was taken in accordance with EPR RGN 1 Understanding the meaning of operator[3].

### Relevant Convictions

The applicant has declared they have no relevant convictions. NRW's COLINS Database has been checked to confirm there are no relevant convictions. No relevant convictions were found.

### Financial Provision

The applicant has declared they have no current or past bankruptcy or insolvency proceeding against them.

There is no known reason to consider that the operator will not be financially able to comply with the permit. The decision was taken in accordance with RGN 5 on Operator Competence.

### Technical competence

Technical competency is required for the proposed activities. The applicant has stated that they have two members of staff with the appropriate WAMITAB Competence Certification. The operator satisfies the criteria in RGN 5 on Operator Competence[4]

## 8.2. Environmental Management System

[3] RGN 1 Understanding the meaning of 'operator' (naturalresources.wales)
[4] regulatory-guidance-note-5-operator-competence.pdf (naturalresources.wales)

The applicant has stated in the application that they will implement an Environmental Management System (EMS) that will meet the requirements for an EMS in our "How to comply with your environmental permit" guidance[5]. The applicant already holds ISO14001:2015 certification and will adopt this standard at the Installation. The applicant has submitted a summary of the EMS with their application.

We have reviewed the application and are satisfied that appropriate management systems and management structures will be in place for this Installation, and that sufficient resources are available to the Operator to ensure compliance with all the Permit conditions.

### Accident management

The EMS includes an Accident Management Plan which the applicant has submitted as part of this application. We have reviewed this and are satisfied that appropriate controls are in place to help reduce the occurrence and impact of any accidence that occur.

In order to ensure that the management system proposed by the applicant sufficiently manages the residual risk of accidents, permit condition 1.1.1a requires the implementation of a written management system which addresses the pollution risks associated with, amongst other things, accidents.

### Fire Prevention and Mitigation

The facility will be operated in accordance with an approved Fire Prevention and Mitigation Plan which has been submitted as part of this application. We have reviewed this and are satisfied that appropriate controls are in place to help reduce the occurrence of fires and impact should one occur.

### Site security

[5] Natural Resources Wales / Guidance to help you comply with your environmental permit

Having considered the information submitted in the application, we are satisfied that appropriate infrastructure and procedures will be in place prior to start up to ensure that the site remains secure.

### 8.3. Operating techniques

#### Installation activities and assessment of Best Available Techniques

The applicant has described the proposed equipment and operating techniques and compared these against the relevant Best Available Techniques conclusions (BATc) which for an installation of this type is the Best Available Techniques (BAT) reference document for Waste Treatment and associated BAT Conclusions (EU/2018/1147).

We have reviewed the techniques proposed and consider them in line with them to represent BAT at this installation. See ANNEX 1 for full details.

We have specified that the applicant must operate the permit in accordance with descriptions in the application. See section 12.1 of this document for more information on how we have incorporated the application/variation into the permit and how emission limit values have been set.

#### Efficient use of raw materials, water and energy

Having considered the information submitted in the application, we are satisfied that the applicant will ensure that raw energy, water energy is used as efficiently as possible.

#### Avoidance, recovery or disposal of wastes produced by the activities

Having considered the information submitted in the application, we are satisfied that the waste hierarchy referred to in Article 4 of the WFD will be applied to the generation of waste and that any waste generated will be treated in accordance with this Article.

We are satisfied that waste from the Installation that cannot be recovered will be disposed of offsite using a method that minimises any impact on the environment. Permit condition 1.4.1 of the permit will ensure that this position is maintained.

# 9. The site

## 9.1. Site Plan

The applicant has provided a plan which we consider is satisfactory, showing the extent of the site of the facility and its emission points.

The plan will be included in the permit and the operator will be required to carry on the permitted activities within the site boundary.

## 9.2. Site Condition Report

The applicant has provided a description of the condition of the site in a Site Condition Report. We have reviewed this and consider this description is satisfactory. The decision was taken in accordance with our guidance on site condition reports – guidance and templates (H5)[6].

## 9.4. Site protection: potentially polluting substances and prevention measures

The operator has a duty to ensure that soil and groundwater are protected in order to meet the requirements of Articles 14 (1)(b), 14(1)(e) and 16(2) of the IED.

On submission, the application did not include adequate information on containment and we there were not able to 'duly make' it. In order to be able to 'duly make' the application, we asked the applicant to provide the following:

- Either, details of the secondary containment proposed for the final effluent concrete tanks, or, confirmation of the details of the proposed tertiary containment system for the final effluent concrete tanks; and
- Inclusion on the Site Drainage Plan details of the secondary containment system (i.e. bunding) that will be used for the concrete final effluent tanks.

[6] Environmental Permitting Regulations , Guidance for applicants H5, Site Condition Report, Guidance and Template (naturalresources.wales)

Based upon the information in the application we are satisfied appropriate measures will be in place to protect the site and its surroundings from polluting substances.

### 9.5. Closure and decommissioning

Permit condition 1.1.1 requires the Operator to have a written management system in place which identifies and minimises risks of pollution including those arising from closure.

At the definitive cessation of activities, the operator has to satisfy us that the necessary measures have been taken so that the site ceases to pose a risk to soil or groundwater, taking into account both the baseline conditions and the site's current or approved future use. To do this, the operator has to apply to us for surrender, which we will not grant unless and until we are satisfied that these requirements have been met.

## 10. Environmental Risk Assessment

Regulated activities can present different types of risk to the environment, these include odour, noise and vibration; accidents, fugitive emissions to air and water; as well as point source releases to air, water, sewer and discharges to ground or groundwater, global warming potential and generation of waste. All these factors have been considered during are determination and the relevant risks from this proposal are discussed in this and other sections of this document.

The next sections of this document explain how we have approached the critical issue of assessing the likely impact of emissions from the Installation on human health and the environment and what measures we are requiring ensuring a high level of protection.

In line with our guidance, the applicant has provided an environmental risk assessment with the application which identifies and the sources of key risks from the Installation, possible pathways and receptors. This risk assessment and further assessments provided by the applicant and/or completed by NRW will be discussed in further detail below.

## 10.1. Assessment of impact on air quality

The waste treatment processes proposed at the Installation will not generate waste gases / fumes. Potential fugitive emissions from storage tanks, resulting from outflow of air during tank filling, will be directed via scrubbing or activated carbon processes. The volumes of air displaced are very low per day and average approximately $1m^3$ per hour for each of the six emission points, i.e. $6m^3$ per hour in total. This is a very low flow, and the level of contamination within these emissions is also low with maximum concentrations estimated to be as follows:

- Hydrogen chloride (HCl) - 5 $mg/Nm^3$;
- Total volatile organic content (TVOC) - 20 $mg/Nm^3$; and
- Ammonia ($NH_3$) - negligible

The applicant has assessed the Installation's potential emissions to air against the relevant air quality standards, and the potential impact upon human health in line with relevant guidance[7] and has found that the proposals meet the requirements of these standards. We agree with the findings of this assessment.

### Emission limits

We have decided that emission limits should be set for the parameters listed in the permit.

The following substances have been identified as being emitted in significant quantities and Emission Limit Values (ELVs) based on BAT have been set for those substances:

| | |
|---|---|
| Hydrogen chloride (HCl)<br>*footnote 2 may apply* | 5 $mg/Nm^3$ |
| TVOC | 20 $mg/Nm^3$ |

[7] Air emissions risk assessment for your environmental permit - GOV.UK (www.gov.uk)

| | |
|---|---|
| $NH_3$ | No limit set |

During the determination, we requested additional information from the applicant in respect of the monitoring requirements set out in the Waste Treatment BRef BAT conclusion 8. The applicant submitting additional information which we considered to sufficiently demonstrate compliance with the requirements of these BAT conclusions.

It is considered that the ELVs or technical measures described above will ensure that significant pollution of the environment is prevented and a high level of protection for the environment secured.

### 10.2. Assessment of impact to surface and ground water

There will be no direct discharges to surface water arising from this Installation. Rainwater falling on the site will be directed via drainage channels to sewer.

Based upon the information in the application we are satisfied that the appropriate measures will be in place to prevent pollution of ground and surface water.

### 10.3. Emissions to sewer

The proposal includes a discharge to sewer. The discharge to sewer flows to the Gowerton Waste Water Treatment Works which discharges at NGR 25609 19783. All contaminants listed in Table S3.2 are also listed in the discharge consent for Gowerton Waste Water Treatment Works.

#### Emission limits

We have decided that emission limits should be set for the parameters listed in the permit.

| | | | |
|---|---|---|---|
| Adsorbable organically bound halogens (AOX). | 1 mg/l | None specified | Once every day |

| | | |
|---|---|---|
| Benzene, toluene, ethylbenzene, xylene (BTEX). | None set | Once every month |
| Free cyanide (CN-). | 0.1 mg/l | Once every day |
| Hydrocarbon oil index (HOI). | 10 mg/l | |
| Arsenic (As). | 0.1 mg/l | |
| Cadmium (Cd). | 0.1 mg/l | |
| Chromium (Cr). | 0.3 mg/l | |
| Copper (Cu). | 0.5 mg/l | |
| Nickel (Ni). | 1 mg/l | |
| Lead (Pb). | 0.3 mg/l | |
| Zinc (Zn). | 2 mg/l | |
| Manganese (Mn). | None set | |
| Hexavalent chromium (Cr(VI)). | None set | |
| Mercury (Hg). | 10 µg/l | |
| PFOA. | None set | Once every six months |
| PFOS. | None set | |

During the determination, we requested additional information from the applicant in respect of the monitoring requirements set out in the Waste Treatment BRef BAT conclusion 6 and 7. The applicant submitting additional information which we considered to sufficiently demonstrate compliance with the requirements of these BAT conclusions.

Based upon the information in the application we are satisfied that the appropriate measures will be in place to prevent pollution of surface waters as a result of the sewer discharge.

### 10.4. Fugitive emissions

The application details measures which will be in place for preventing and minimising fugitive emissions.

Based upon the information in the application we are satisfied that the appropriate measures will be in place to prevent or where that is not practicable to minimise fugitive emissions and to prevent pollution from fugitive emissions.

Permit condition 3.2.1 requires that emissions of substances not controlled by emission limits (i.e., fugitive emissions) shall not cause pollution. Condition 3.2.2 requires that a management plan shall be developed if pollution is subsequently identified.

### 10.5. Assessment of odour impact

There are sensitive receptors within the vicinity of the installation which the applicant has identified in theor Odour Risk Assessment.

The applicant has identified the following sources of odour in their environmental risk assessment:

- The initial oil separation stage via gravitational settling that takes place within the four 36 $m^3$ Oil and Water Tanks;
- The final effluent treatment within the 36 $m^3$ reactor vessel; and
  The three concrete final effluent storage tanks.

The applicant has carried out an Odour Modelling study using ADMS 5. The assassessment identified that the 36 $m^3$ reactor vessel, which is served by a 3.8 m caustic wet scrubber designed to neutralises acid gasses, is the main source of odour to be considered in the assessment. Detailed air quality modelling using the ADMS 5 dispersion model has been undertaken to predict the impacts associated with the odour emissions from the caustic wet scrubber, which were found to be within odour benchmark levels published in the Environment Agency's H4 Odour Management[8], which we use. We agree with this approach.

The application details measures which will be in place for preventing and minimising odour pollution.

[8] H4 Odour Management / How to comply (publishing.service.gov.uk)

Based upon the information in the application we are satisfied that the appropriate measures will be in place to prevent or where not practicable to minimise the effects of odour.

Condition 3.3.1 in the permit will also require that emissions from the activities are free from odour at levels likely to cause pollution outside the site. We are satisfied that this will be sufficiently protective in conjunction with the measures described by the applicant for minimising odour at the installation.

### 10.6. Noise and vibration assessment

There are sensitive receptors within the vicinity of the installation.

The applicant has identified the following sources of noise in their environmental risk assessment:

- Pumps;
- Tanker deliveries; and
- Processing plant

The application details measures which will be in place for preventing and minimising noise and/or vibration.

We have compared the measures proposed to minimise odour at for the site to the relevant guidance for noise and vibration management[9] and the Waste Treatment BRef BAT conclusions and are satisfied the techniques represent appropriate measures for the installation. The NMP will be incorporated into the operating techniques section of the permit.

We are satisfied that vibration is unlikely to be an issue at the installation. The nature of the activity means that there are no significant sources of vibration on site. Therefore, vibration does not need to be included in the management plan.

[9] Noise and vibration management: environmental permits - GOV.UK (www.gov.uk)

Based upon the information in the application we are satisfied that the appropriate measures will be in place to prevent or where not practicable to minimise the effects of noise.

Conditions 3.4.1 of the permit requires noise from the activities to be below that which could cause pollution outside the site. We are satisfied that this will be sufficiently protective in conjunction with the measures described by the applicant for minimising noise at the installation.

## 11. Impact on National Site Network Sites, SSSIs and non-statutory sites

The applicant has used the relevant screening distance criteria to identify relevant protected conservation sites which could be at risk from the proposal. The applicant has used a 10 km screening distance and we are in agreement with this.

A full assessment of the variation application and its potential to affect the identified sites identified has been carried out as part of the permit determination process. National Site Network sites, Sites of Special Scientific Interest (SSSI) and non-statutory conservation sites will be discussed separately below.

### 11.1. The National Site Network

The following National Site Network sites are located within 5 km of the installation:

- Burry Inlet and Loughor Estuary RAMSAR and SAC.

A Habitats Regulations Assessment (HRA) is not required because there is no conceivable impact pathway to any of the National Site Network sites identified by virtue of the scale or location or nature of the project. We took the decision not to complete a HRA for the following reasons:

- In relation to emissions to air, the low flow rate means pollutant concentrations are negligible, especially when considered in the context of the location of the

Burry Inlet and Loughor Estuary SAC and RAMSAR at 2.68 km distance from the Installation; and

- In relation to emissions to water, discharge of site effluent is to foul sewer, and will be subject to the Emission Limit Values (ELVs) stipulated in the permit and those included in the sewerage undertaker's Discharge Consent, which replicate the permit ELVs.

### 11.2. Sites of Special Scientific Interest (SSSI)

The following SSSIs are located within 5 km of the installation:

- Burry Inlet and Loughor Estuary 33WWL;
- Penplas Grasslands 33WHF;
- Fairwood, Pengwern and Welshmoor Commons 33WWR; and
- Nant y Crimp 33WML.

As a Section 28G Authority as defined in the Countryside Rights of Way Act 2000 permitting teams within NRW has a legal duty, under Section 28I of the Wildlife and Countryside Act 2981, to consult with NRW for formal advice when permitting an activity which has been determined to be likely to damage the features of a SSSI.

In relation to emissions to air, the low flow rate means pollutant concentrations are negligible, especially when considered in the context of the locations of the SSSIs between 2.75 km and 4.8 km distance from the Installation. In relation to emissions to water, discharge of site effluent is to foul sewer, and will be subject to the Emission Limit Values (ELVs) stipulated in the permit and those included in the sewerage undertaker's Discharge Consent, which replicate the permit ELVs.

Therefore, we consider that the permission is not likely to damage any of the flora, fauna or geological or physiological features which are of special interest because of conditions. Therefore, no consultation with NRW's protected sites advisors is required.

### 11.3. Non-statutory conservation sites

There are a number of non-statutory conservation sites within 5 km of the Installation.

In relation to emissions to air, the low flow rate means pollutant concentrations are negligible, especially when considered in the context of the locations of the SSSIs between 2.75 km and 4.8 km distance from the Installation. In relation to emissions to water, discharge of site effluent is to foul sewer, and will be subject to the Emission Limit Values (ELVs) stipulated in the permit and those included in the sewerage undertaker's Discharge Consent, which replicate the permit ELVs.

Therefore, based upon the information in the application, we are satisfied that there will be no adverse impact to the non-statutory conservation sites identified.

# 12. The Permit Conditions

## 12.1. Incorporating the application

We have specified that the applicant must operate the permit in accordance with descriptions in the application.

These descriptions have been specified in the Operating Techniques table in the permit.

## 12.2. Emission Limits

Article 14(3) of IED states that BAT conclusions shall be the reference for permit conditions. Article 15(3) further requires that under normal operating conditions; emissions do not exceed the emission levels associated with the best available techniques as laid down in the decisions on BAT conclusions.

BAT conclusions set out specific limits that the operator must comply with. Modelling has been used to demonstrate that the operator will be able to comply with the emission limits described as BAT.

## 12.3. Monitoring

We have decided that monitoring should be carried out for the parameters listed in Schedule 3 of the permit using the methods and to the frequencies specified in those tables. These monitoring requirements have been imposed in order to demonstrate compliance with the emissions limits in the permit.

Based on the information in the application and the requirements set in the conditions of the permit we are satisfied that the monitoring techniques, personnel and equipment employed by the Operator will have either MCERTS certification or MCERTS accreditation as appropriate.

### 12.4. Reporting

We have specified the reporting requirements in Schedule 4 of the Permit to ensure data is reported to enable timely review by Natural Resources Wales to ensure compliance with permit conditions and to monitor the efficiency of material use and waste recovery at the installation.

### 12.5. Waste Types

We have specified the permitted waste types, descriptions and quantities, which can be accepted at the regulated facility. The waste types that may be accepted at the Installation are listed in Table S2.1. The maximum quantity of these waste types that the Installation is permitted to accept per year is 32,000 tonnes.

We are satisfied that the operator can accept these wastes because they have demonstrated that they are able to achieve the level of environmental control, in line with the requirements of the Waste Treatment BRef, that is appropriate for this type of activity. They have also demonstrated that they will employ staff who hold the appropriate standard of Technical Competance for this type of activity.

## 13. OPRA

The agreed OPRA score at the installation is 74. This will form the basis for ongoing subsistence fees.

## ANNEX 1: BAT Assessment

BAT Conclusions for Waste Treatment in the Official Journal of the EU on 17 August 2028. There are 52 BAT Conclusions. This checklist provides a record of decisions made in relation to each relevant BAT Conclusion applicable to the installation. This annex should be read in conjunction with the permit. For definitions and acronyms see the BAT Conclusions Document.

| BATc number | Summary of BAT Conclusion requirement | **Status/comment**<br>**One of the following:**<br>Not Applicable, Currently Compliant, Compliant in the future, Not Compliant |
|---|---|---|
| BAT 1 – 24 | General BAT conclusions for the sector | Currently compliant |
| BAT 25 - 39 | BAT conclusions for mechanical treatment and biological treatment of waste | Not applicable |
| BAT 40 - 51 | BAT conclusions for the physico-chemical treatment of waste | Currently compliant |
| BAT 50 - 52 | BAT conclusions for the treatment of waste based liquid waste | Currently compliant |