

Natural Resources Wales Permitting Decisions

Mekatek Limited

Decision Document

Application for a Substantial Variation

The application number is: PAN-023495

The permit variation number is: EPR/AB3698ZE/V003

The applicant / operator is: Mekatek Limited

The Installation is located at: Mekatek Limited, Unit C, Maerdy Industrial Estate (South), Rhymney, NP22 5PH

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

Contents	2
1. Executive summary	4
1.1. Application summary	4
1.2. Our decision	4
2. Receipt of the application	5
5. Consultation	6
5.1. Consultation on the Application	6
5.2. Draft Permit Consultation	7
6. Requests for information	7
7. The Installation	8
7.1. The permitted activities	8
7.2. What the installation will do	9
8. Operation of the installation	10
8.2. Operator competence	10
8.2. Environmental Management System	10
9. The site	12
9.1. Site Plan	12
9.2. Site Condition Report	13
10. Environmental Risk Assessment	13
10.4. Fugitive emissions	14
10.5. Assessment of odour impact	14
10.6. Noise and vibration assessment	15
11. Impact on National Site Network Sites, SSSIs and non-statutory sites	17
11.1. The National Site Network	17
11.2. Sites of Special Scientific Interest (SSSI)	18
11.3. Non-statutory conservation sites	18
12. The Permit Conditions	19
12.1. Incorporating the variation	19
12.2. Reporting	19
12.3. Waste Types	19
12.4. Improvement conditions	20
13. OPRA	21
ANNEX 1: Improvement Conditions	22
ANNEX 2: Consultation Responses	23
1. Advertising and consultation on the Application	23

ANNEX 3: BAT Assessment	26
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1. Executive summary

1.1. Application summary

Mekatek Limited have applied to vary their current permit. The proposed changes mean that their permit will change to an installation permit.

The waste recovery and recycling facility is currently permitted to process waste electrical and electronic equipment (WEEE), selected source segregated packaging materials, plastics and metals. The site currently accepts a maximum of 30,999 tonnes per annum and includes the receipt, storage, segregation and mechanical processing into various grades of granular metals and plastics for sale as recovered product. All treatment is for the purpose of recovery only. Treatment of materials includes either manual and/or mechanical methods.

The proposed changes are:

- To increase the amount of waste processed by the facility from 30,999 tonnes per annum to 50,000 tonnes per annum (200 tonnes per day);
- To include new automated plant and equipment including shredding equipment, granulation equipment, separation equipment, and sorting equipment;
- To consolidate exempt activities (T4 and T9 exemptions) within the plastic processing activity area into the permit, and keep the existing waste facility;
- To include additional European Waste Catalogue (EWC) codes, to be able to accept further waste types to site.

1.2. Our decision

We are minded to issue the permit variation for Mekatek Limited operated by Mekatek 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 05/10/2023. In order for us to be able to consider the application duly made, we needed more information. We requested the following:

- Noise management plan
- Dust management plan

A letter requesting this information was sent to the applicant on 31/05/2023. Upon receipt of this information, on 14/06/2024, we were able to consider the application duly made. 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 variation will be issued, under Regulation 20 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.

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 issuing the variation 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 statement¹ 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.

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

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 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”:

- Caerphilly County Borough Council Environmental Protection Department
- Caerphilly County Borough Council Planning Department
- South Wales Fire and Rescue Service
- Public Health Wales
- Health and Safety Executive

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

The consultation started 17/07/2024 and ended on 15/08/2024.

A summary of consultation comments and our response to the representations we received can be found in Annex 2. We have taken all relevant representations into consideration in reaching our decision.

5.2. Draft Permit Consultation

We are now carrying out consultation on our draft decision. This consultation will begin on 17/04/2025 and end on 19/05/2025.

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 the proposed activities, the noise impact assessment undertaken and the Fire Prevention and Mitigation Plan. The Schedule 5 Notice was sent on 02/10/2024 with a deadline for response of 25/10/2024.

The applicant’s response to the Schedule 5 Notice was provided on 24/10/2024. The additional information supplied satisfied the requirements of the Schedule 5 Notice.

An informal information request was also made via email. This related to whether the Operator had measures in place for the management of waste containing Persistent Organic Pollutants (POPs).

A copy of the information notice and e-mail 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 will be an installation which comprises the following activities listed in Part 2 of Schedule 1 to the Environmental Permitting Regulations:

- Section 5.3 Part A (1)(a)(vi) Disposal or recovery of hazardous waste with a capacity exceeding 10 tonnes per day involving one or more of the following activities— (vi) recycling or reclamation of inorganic materials other than metals or metal compounds
- Section 5.4 Part A (1)(b)(iv) Recovery or a mix of recovery and disposal of non-hazardous waste with a capacity exceeding 75 tonnes per day involving one or more of the following activities – (iv) treatment in shredders of metal waste, including waste electrical and electronic equipment and end-of-life vehicles and their components
- Section 5.6 Temporary or underground storage of hazardous waste Part A(1)(a) Temporary storage of hazardous waste with a total capacity exceeding 50 tonnes pending any of the activities listed in Sections 5.1, 5.2, 5.3.

The Operator will also continue to undertake their current permitted waste operation, a household, commercial and industrial waste transfer station with treatment including:

- 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
- R4: Recycling/ reclamation of metals and metal compounds
- R5: Recycling/reclamation of other inorganic compounds

7.2. What the installation will do

The site will continue to process WEEE, selected source segregated packaging materials, plastics and metals as currently permitted. The activities at the site include a combination of physical and mechanical dismantling, sorting, separation, segregation, grading, shredding, cutting, metal removal, granulation, baling and bulking. All physical and mechanical processing takes place within the main processing building.

New equipment will be installed and consist of shredding and size reduction equipment, magnetic separation and further downstream separation mainly consisting of optical separation. The nominal throughput of this plant will be 2-4 tonnes per hour.

The proposed cable granulation plant will consist of a pre-sort area, conveying system into a rasper/shredder followed by magnetic separation, granulation and air separation. The nominal throughput of this plant will be 2-4 tonnes per hour. The area of site, within the building, which currently houses the plastic processing facility will be utilised for storage and cable granulation.

All recovered/processed materials are stored within dedicated storage bays ready for offsite transfer and sale. Any waste materials that are not able to be recycled on site are stored pending off-site transfer to other licensed waste management facilities for further processing or disposal.

The only external activities are the storage of wooden pallets which are stored before being collected and transferred off site and an external storage area which is used solely for the temporary storage of recycled material or products within skip containers.

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 variation is issued; 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 operator².

8.2. Environmental Management System

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” guidance³.

The Operator has their own written management system (MK-SWP revision 2), also referred to as their working plan. The applicant has submitted a summary with their application, which has been updated to reflect the proposed changes.

The following associated procedures are contained within the Operator’s working plan:

- SOP-105 – Waste Pre-Acceptance;
- MK-E02 – Waste Acceptance;
- MK-E03 – Waste Rejection;
- MK-E04 – Off Site Waste Transfers;
- MK-E05 – Waste Reception;
- MK-E06 – Environmental Records;
- MK-E07 – Environmental Management and Monitoring Programme;
- MK-E08 – Infrastructure Management and Monitoring Programme.

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.

² [RGN 1 Understanding the meaning of 'operator' \(naturalresources.wales\)](#)

³ [Natural Resources Wales / Guidance to help you comply with your environmental permit](#)

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 accident 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.

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 are the BAT Conclusions for Waste Treatment, published in the Official Journal of the EU on 10 August 2018.

We have reviewed the techniques proposed and consider them in line with them to represent BAT at this installation. The details of our assessment can be found in Annex 3.

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 variation into the permit.

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 materials, water and energy is used as efficiently as possible. The Operator will be required to report on their usage annually, under condition 4.2 and Schedule 4 of the permit.

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 site is located within the south of the Maerdy Industrial Estate with industrial and commercial units to the north and west and residential dwellings of the town of Rhymney to the south and east. The site is roughly rectangular in shape and extends in area to 3ha. The site is bounded to the west by the Valley Railway Line.

The site comprises a steel frame building with tarmac, concrete and gravelled external areas. A vegetated railway siding is present to the east of the building and an old railway track and disused land in the west. The northern half of the main building is owned by Williams Medical Supplies. The nearest residential development is located 50 metres away on Forge Crescent, to the east of the site. The River Rhymey is culverted beneath the west of the site flowing north – south.

A portion of the site which houses the plastic processing facility, currently exempted activities, is not included within the existing permit boundary. This variation proposes to include this area, part of the existing building, within the Installation Boundary. There will be no other changes to the Installation Boundary as part of this permit variation

The applicant has provided a an updated plan which we consider is satisfactory, showing the extent of the site of the facility.

The updated 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 proposed to add land to the facility as part of this variation, although it is an area within the existing building. They have provided a description of the condition of that land 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)⁴.

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 variation, 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.

⁴ [Environmental Permitting Regulations , Guidance for applicants H5, Site Condition Report, Guidance and Template \(naturalresources.wales\)](#)

There are no point source emissions to air, sewer or discharges to ground or groundwater from the site.

Uncontaminated surface water run-off from external hard standing and roof top areas discharges via surface water drain and is ultimately discharged to the River Rhymney (points W1 and W2 on site drainage plan).

It is not considered that the site will have any global warming potential as a result of the activities carried out.

10.4. Fugitive emissions

The applicant has identified the following potential fugitive emissions in their environmental risk assessment:

- Dust

The application details measures which will be in place for preventing and minimising fugitive emissions. A Dust Management Plan has been submitted as part of the application.

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.

The Dust Emissions Plan will be incorporated into the operating techniques section of the permit.

Permit condition 3.1.1 requires that emissions of substances not controlled by emission limits (i.e., fugitive emissions) shall not cause pollution. Condition 3.1.2 requires that a management plan shall be developed if pollution is subsequently identified.

10.5. Assessment of odour impact

Odour is not considered to be a risk from the activities on site. There will be no odorous materials accepted to site and therefore no odorous releases are anticipated.

The applicant has however submitted an Odour Management Plan (OMP) which details various measures to minimize and mitigate odour issues. The OMP has been used on site since 2018 and was previously incorporated into the operating techniques section of the permit. The OMP has been updated as part of the variation to increase the tonnage of waste accepted on site to 50,000 tonnes per annum. There have been no changes to the odour mitigation measures. The operating techniques table of the permit will be updated to reflect the new submission.

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 3.2.1 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 residential receptors:

- Two storey residential premises located c.25 metres distance to the on the east of Mekatek site boundary, as on the opposite (east) side of Wellington Way.
- Single storey housing adjoining the eastern Mekatek site boundary (Maerdy House), as located on the near (west) side of Wellington Way.
- Single storey residential premises (St Clare's sheltered housing) located c.55 metres distance to the south of the Mekatek site boundary, as on the opposite (south) side of St Clare's.

The applicant has identified the following sources of noise in their Noise Management Plan (NMP):

- Existing plant and machinery within the processing building

- Proposed additional shredder and associated conveyors within the processing building
- Movement of HGV vehicles and forklift truck on site

The Facility operates 24 hours a day, 7 days a week.

The applicant has undertaken a noise impact assessment and provided an acoustic assessment report with their application. The report and NMP have been assessed by our Air Quality and Noise Team as part of our determination.

Measurements were carried out in accordance with the requirements of BS 4142:2014+A1:2019 between Wednesday 6th September and Monday 11th September 2023. Background, ambient and residual sound was measured at two locations for comparison of existing and proposed rating levels at receptors.

In general, we consider that the submitted report meets the requirements detailed in Section 12 of BS 4142:2014+A1:2019. It concludes that the proposed operating scenario will not result in adverse impacts at identified noise sensitive receptors. While our review suggests that this conclusion is contrary to the literal interpretation of Assessment of Impacts detailed in Section 11 of BS 4142:2014+A1:2019, the predicted exceedances greater than +5dB at receptors, may not necessarily result in nearby residents experiencing adverse impacts.

The sound from mobile plant and HGV movements has not been considered in conjunction with impacts at receptors from the proposed operating scenario. There is currently no history of complaints associated with plant and vehicle movements from residents and the submitted report states that the proposed changes in operations will not result in changes to vehicle/mobile plant movement, duration or frequency; it is therefore unlikely that this omission will affect the overall conclusions presented in the submitted report for daytime operation.

Taking into account the submitted report and the fact the site is already operational and has no recorded noise issues, we do not consider that the proposed changes will have an adverse impact. We will however request, by way of an improvement

condition, that following the operation of the new Ulster U150 Shredder and associated conveyor systems, the Operator undertake further noise monitoring. The purpose of this monitoring will be to ensure that the actual impacts from the U150 Shredder and associated conveyor systems do not exceed those predicted.

The applicant's NMP details various measures to minimize and mitigate noise issues. We have compared the measures proposed to minimise noise at the site to the requirements detailed in the guidance "Noise and vibration management: environmental permits" available at [Noise and vibration management: environmental permits - GOV.UK](#). 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.

Conditions 3.3.1 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

A full assessment of the variation application and its potential to affect any sites identified within the relevant screening distances 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 10 km of the installation:

- SAC - Usk Bat Sites / Safleodd Ystlumod Wysg - UK0014784 (9km)

- SAC - Aberbargoed Grasslands - UK0030071 (8km)

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. There are no point source emissions to air, land or water from the existing processes on site, or proposed as part of the permit variation. All waste treatment activities will continue to take place within the existing building.

11.2. Sites of Special Scientific Interest (SSSI)

There are no SSSIs located within 2 km of the installation, therefore, no further assessment was required.

11.3. Non-statutory conservation sites

The following relevant non-statutory sites are located within 2 km of the installation:

- Mynydd Bedwellte Local Wildlife Site
- River Rhymney Local Wildlife Site
- Y Graig Mire Local Wildlife Site, South of Abertysswg
- Cefn Gelligaer Local Wildlife Site, West of Deri
- Butetown Local Wildlife Site, Llechryd and Rhymney Grasslands, Rhymney
- Nant Bargod Rhymni Local Wildlife Site
- Nant Bargod Flush Local Wildlife Site, South of Fochriw
- Cefn y Brithdir Local Wildlife Site, South of Pontlottyn
- Mile End Pond Local Wildlife Site, Abertysswg

Two areas of Ancient Semi Natural Woodland have also been identified within 2 km of the installation.

There are no point source emissions to air or land from the existing processes on site, or proposed as part of the permit variation. There are no process emissions to water, only uncontaminated surface water run-off from external hard standing and roof top areas. This discharges via surface water drain and is ultimately discharged to the River Rhymney. There is no change to this as a result of the variation.

All waste treatment activities will continue to take place within the existing building. Measures will be implemented to control any potential fugitive emissions of dust and

the Operator's Dust Management Plan will be incorporated into the operating techniques table in the permit.

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 variation

We have specified that the applicant must operate the permit in accordance with descriptions in the application, including additional information received as part of the determination process.

These descriptions have been specified in the Operating Techniques table in Schedule 1 the permit.

12.2. 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.

The permit has been varied to an installation permit, and will therefore be subject to IED reporting requirements. Parameters have been included for the amount of waste received and treated on site annually, water and energy usage and raw materials used. Reporting forms will be provided to the Operator on issue of the variation.

12.3. Waste Types

The Operator has proposed additional waste codes be added to the permit, through the variation.

The permitted waste types, descriptions and quantities, which can be accepted at the regulated facility are specified in Schedule 2 of the permit. We have updated Table 2.1 to include the following new waste types:

16 01 21* - hazardous components other than those mentioned in 16 01 07 to 16 01 11 and 16 01 13 and 16 01 14

17 04 10* - cables containing oil, coal tar and other hazardous substances

19 01 11* - bottom ash and slag containing hazardous substances

19 01 12 - bottom ash and slag other than those mentioned in 19 01 11

19 02 04 - mixed waste from treating WEEE containing hazardous components and POPs

19 10 03* - fluff-light fraction and dust containing hazardous substances

19 10 05* - other fractions containing hazardous substances

19 12 11* - other wastes (including mixtures of materials) from mechanical treatment of waste containing hazardous substances

19 12 12 - other wastes (including mixtures of materials) from mechanical treatment of wastes other than those mentioned in 19 12 11.

The maximum quantity of these waste types that the Installation is permitted to accept is 50,000 tonnes per annum.

We are satisfied that the Operator can accept these additional wastes because they have demonstrated that they are able to achieve the appropriate level of environmental control, through their written procedures, in line with the requirements of the Waste Treatment BRef.

The Operator has written procedures for the handling, processing and disposal of Persistent Organic Pollutants (POPs). The procedures meet the requirements of NRW's guidance on identifying, classifying and managing waste containing persistent organic pollutants (POPs) available on our website at [Natural Resources Wales / Identify, classify and manage waste containing persistent organic pollutants \(POPs\)](#).

These procedures will be added to the Operating Techniques in the permit.

12.4. Improvement conditions

Based on the information in the application, we consider that we need to impose an improvement condition.

We have requested that following the successful commissioning and establishment of routine operation of the new Ulster U150 Shredder and associated conveyor systems, the Operator shall undertake further noise monitoring. The purpose of this monitoring is to ensure that actual impacts from the U150 Shredder and associated conveyor systems do not exceed those predicted in the Sol Acoustics Noise Impact Assessment report submitted as part of the variation.

Condition 2.4.1 in the permit will require that the Operator complete the specified actions within the relevant timescale. Details of the improvement condition used can be found at Annex 1.

13. OPRA

The agreed OPRA score for the installation is 84. This will form the basis for ongoing subsistence fees.

Waste facility subsistence fees are no longer based on OPRA. The applicable charge set out in our Charging Scheme is multiplied by the relevant annual compliance rating adjustment.

ANNEX 1: Improvement Conditions

As referenced in section 12.4 we have decided to include an improvement condition, requesting that the Operator undertake further noise monitoring upon commencement of operation of the new Ulster U150 shredder and associated conveyor systems.

The improvement condition will be incorporated into the permit, as detailed in the table below.

Table S1.3 Improvement programme requirements

Reference	Requirement	Date
IC1	Upon commencement of operation of the Ulster U150 Shredder and associated conveyor systems, the Operator shall undertake noise monitoring at Receptors A, B and C (identified in the Sol Acoustics Environmental Noise Impact Assessment report (September 2023). The purpose of this monitoring is to ensure that actual impacts from the U150 Shredder and associated conveyor systems do not exceed those predicted in the Sol Acoustics September 2023 report.	Within 1 month of the start of Ulster U150 Shredder operation

This shall:

- Include a full noise monitoring survey and assessment meeting the BS4142:2014 + A1:2019 standard; following the guidance set out in Noise and Vibration Management: Environmental Permits and Method Implementation Document (MID) for BS4142; and
- Reference the Welsh Government Noise and Soundscape Action Plan 2023 – 2028.

Upon completion of the monitoring and assessment, a written report shall be submitted to Natural Resources Wales for approval. The report shall refer to the predictions in the September 2023 Sol Acoustics report.

If the assessment of the impacts demonstrates an adverse impact or potential pollution at the sensitive receptors, the operator shall:

- (a) submit to Natural Resources Wales for approval within the period specified, a revised noise management plan which minimises the adverse impact or potential pollution using appropriate measures;
- (b) implement the approved noise management plan, from the date of approval, unless otherwise agreed in writing by Natural Resources Wales.

The revised noise management plan shall include an assessment of the most suitable abatement techniques/appropriate measures, an estimate of the cost and a proposed timetable for their installation.

ANNEX 2: Consultation Responses

1. Advertising and consultation on the Application

The application has been advertised and consulted upon in accordance with Natural Resources Wales Public Participation Statement. Responses to this consultation and how we have taken consultation responses into account in reaching our draft decision is summarised in this Annex.

Consultation Responses from Statutory and Non-Statutory Bodies

Response Received from	
Brief summary of issues raised:	Summary of action taken / how this has been covered
Public Health Wales	<p>Proposed development - Subject to the application of Best Available Techniques (BAT) to control emissions and provided the site is operated in line with current sector guidance, we have no public health concerns associated with the proposed development. We would however, strongly recommend that the regulator is completely satisfied with the documentation provided by the site operator. A Fire Prevention Plan has been submitted, however the local authority noise proforma has not been completed and no odour management plan, dust management plan, noise impact assessment or environmental management system (EMS) have been submitted. While it is anticipated that these documents have been submitted as part of the original permit application, given the increased capacity of the site, the regulator should ensure they are fully satisfied with these in light of the proposed changes.</p> <p>Public Health Risk Assessment - Our main concern with sites that store and manage waste is risk of fire. Where fires do occur, they can present a potentially serious risk to public health and the environment. In order to achieve good fire risk management, we agree with the Waste Industry Safety and Health Forum</p>

	<p>(WISH) that waste management operators should go beyond basic legal and regulatory compliance. As such, we strongly recommend that the operator follow and adhere to the WISH 'Reducing Fire Risk at Waste Management Sites' Guidance. This sets out clear advice and information to help reduce the likelihood and frequency of fires, and measures to reduce the impact should fires occur. In view of the potential local public health impact of a fire and to minimise risks, the regulator must make sure that the operations are managed in accordance with current guidance.</p> <p>Response: The Operator has submitted all of the documents referenced above and completed a noise impact assessment. They have all been assessed as part of our determination.</p>
South Wales Fire and Rescue Service (FRS)	<p>A robust management system should be employed to reduce the burden on FRS of unwanted fire signals/false alarms.</p> <p>Confirmation is required whether the quarantine area is capable of holding at least 50% of the largest stack. Area 1 mentions 2400m³, whereby 3.11 mentions 'The quarantine area has been designed to hold 900m³ (15m x 15m x 4m)'</p> <p>Confirmation is required as to whether mobile plant and suitably trained drivers are available and integrated as part of a firefighting strategy, and available during out of normal working hours.</p> <p>A firefighting strategy should be developed in line with GN16 section 19.</p> <p>Response: We are only able to assess parts of the FPMP relevant to the variation. The Operator has now updated their FPMP to ensure the quarantine area is the appropriate size. This has included a change in the</p>

	layout of waste stacks in the building. Previous fire-fighting measures included within the plan remain the same. Fire signals/false alarms do not form part of our FPMP guidance.
Caerphilly County Borough Council Environmental Protection Department	No response received
Caerphilly County Borough Council Planning Department	No response received
Health and Safety Executive	No response received

Consultation Responses from Members of the Public and Community Organisations

None received

Representations from Local MP, Assembly Member (AM), Councillors and Parish / Town / Community Councils

None received

Representations from Community and Other Organisations

None received

Representations from Individual Members of the Public

None received

ANNEX 3: BAT Assessment

BAT Conclusions for Waste Treatment were published in the Official Journal of the EU on 10 August 2018. There are 53 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 One of the following: Not Applicable, Currently Compliant, Compliant in the future (Only for existing activities within 4 years of publication of BAT conclusions), Not Compliant		
OVERALL ENVIRONMENTAL PERFORMANCE				
1	Environment Management System (EMS) – <u>ALL</u> of the following:			
	I.	Management commitment	Currently compliant - The Operator has an EMS (working plan) in place that incorporates the relevant features outlined within the BREF document.	
	II.	Environmental policy development including CI of performance		
	III.	Planning and implementing procedures & targets in conjunction with financial planning & investment		
	IV.	Implementation of procedures		The Operator has stated that all staff are appropriately trained on the working plan and associated procedures.
		(a) Structure & responsibility		
		(b) Recruitment, training, awareness & competence		
		(c) Communication		
		(d) Employee involvement		
		(e) Documentation		
	(f) Effective process control			

BATc number	Summary of BAT Conclusion requirement	Status/comment One of the following: Not Applicable, Currently Compliant, Compliant in the future (Only for existing activities within 4 years of publication of BAT conclusions), Not Compliant
	(g) Maintenance programmes	
	(h) Emergency preparedness & response	
	(i) Safeguarding compliance with environmental legislation	
	Checking performance and taking corrective action	
	(a) Monitoring & measurement	
	(b) Corrective and preventive action	
	(c) Maintenance of records	
	(d) Independent (where practicable) internal or external EMS auditing	
	VI. Senior management review of EMS	
	VII. Following development of cleaner technologies	
	VIII. Whole life cycle considerations when designing a new plant i.e. impacts from eventual decommissioning and throughout its operating life	
	IX. Regular sectoral bench marking	
	X. Waste stream management (BAT 2)	
	XI. Inventory of wastewater & waste gas streams (BAT 3)	
	XII. Residues Management Plan – S6.5	
	XIII. Accident Management Plan – S6.5	Currently Compliant – The Operator has stated that they will follow the measures in MK-E09 Accident Management Plan and have a Fire Prevention and Mitigation Plan in place.
	XIV. Odour Management Plan (BAT 12)	Currently Compliant – The Operator has stated that they will follow the measures in MK-E10 Odour Management Plan

BATc number		Summary of BAT Conclusion requirement	Status/comment One of the following: Not Applicable, Currently Compliant, Compliant in the future (Only for existing activities within 4 years of publication of BAT conclusions), Not Compliant
	XV.	Noise & Vibration Management Plan (BAT 17)	Currently Compliant – The Operator has stated that they will follow the measures in MK-E12 Noise Management Plan
2	Improving overall environmental performance – <u>ALL</u> of the following:		
	a.	Set up and implement waste characterisation & pre-acceptance procedures	Currently Compliant - The Operator has stated that they will follow the procedures set out in: <ul style="list-style-type: none">- SOP-105 Waste Pre-Acceptance- MK-E02 Waste Acceptance- MK-E03 Waste Rejection- MK-E04 Off Site Waste Transfers- MK-E05 Waste Reception and Storage- MK-E06 Environmental Records- MK-E07 Environmental Management and Monitoring Programme- Waste segregation in accordance with the sites FPMP.
	b.	Set up and implement waste acceptance procedures	
	c.	Set up and implement a waste tracking system & inventory	
	d.	Set up and implement an output quality management system	
	e.	Ensure waste segregation	
	f.	Ensure waste compatibility prior to mixing or blending	
	g.	Sort solid incoming waste – S6.4	
3	Establish and maintain a wastewater and waste gas inventory as part of the EMS - <u>ALL</u> of the following:		
	Information on characteristics of waste and waste treatment processes		
	(i)(a)	simplified process flow sheets showing emission sources	Not Applicable - There are no wastewater or waste gas streams
	(i)(b)	Process-integrated and wastewater/waste gas treatment descriptions including performance	
	Information on characteristics of wastewater streams		
	(ii)(a)	Mean and variability of:	Not Applicable
		Flow	
pH			

BATc number		Summary of BAT Conclusion requirement	Status/comment One of the following: Not Applicable, Currently Compliant, Compliant in the future (Only for existing activities within 4 years of publication of BAT conclusions), Not Compliant		
		Temperature			
		Conductivity			
	(ii)(b)	Mean concentration, load and variability of:	Not Applicable		
		Total suspended solids			
		COD/TOC			
		Nitrogen species			
		Phosphorous			
		Metals			
		Priority substances/micropollutants			
		Any other relevant compounds			
		(ii)(c)		Bioeliminability data (see BAT 52):	Not Applicable
				BOD	
	BOD to COD ratio				
	Zahn-Wellens test				
	Biological inhibition potential				
	Information on characteristics of waste gas streams				
	(iii)(a)	Mean and variability of:	Not Applicable		
		Flow			
		temperature			
	(iii)(b)	Mean concentration, load and variability of relevant substances:	Not Applicable		
		Organic compounds			
		POPs e.g. PCBs			
		Any other relevant compounds			

BATc number	Summary of BAT Conclusion requirement		Status/comment One of the following: Not Applicable, Currently Compliant, Compliant in the future (Only for existing activities within 4 years of publication of BAT conclusions), Not Compliant
	(iii)(c)	Flammability	Not Applicable
		Lower and Higher Explosive Limits	
		Reactivity	
	(iii)(d)	<i>Presence of other substances that may affect the gas treatment system or plant safety:</i>	
		O2	Not Applicable
		N2	
		Water vapour	
		Dust	
4	Reducing environmental risk associated with waste storage – <u>ALL</u> of the following:		<p>Currently Compliant – The Operator has stated that all waste being received by the site is inspected and manually sorted into categories prior to being placed within specific separated and clearly demarcated storage bays.</p> <p>The sites storage areas have been designed in accordance with FPMP requirements and consideration has been given to optimised storage locations, adequate storage capacity and safe storage operation. The FPMP site plan clearly indicates all storage area locations and maximum capacities.</p>
	a.	Optimised storage location	
	b.	Adequate storage capacity	
	c.	Safe storage operation	
	d.	Separate area for storage & handling of packaged hazardous waste	
5	Set up and implement procedures to reduce the environmental risk associated with handling and transfer of waste - include following elements:		<p>Currently Compliant – The Operator has stated that all handling and transfer of waste is carried out by competent staff and documented via the sites acceptance procedures and management system.</p>
		Carried out by competent staff	
		Duly documented, validated and verified	
		Spill prevention, detection and mitigation measures	

BATc number		Summary of BAT Conclusion requirement	Status/comment One of the following: Not Applicable, Currently Compliant, Compliant in the future (Only for existing activities within 4 years of publication of BAT conclusions), Not Compliant	
	Take precautions when mixing or blending wastes		Any spillages on site will be detected via the sites site walkover procedure and managed accordingly.	
	Procedures are risk-based and consider likelihood of accidents, incidents and their environmental impact			
MONITORING				
6	Relevant emissions to water: monitor key process parameters at key locations			
	Key process parameters			
	Wastewater flow	Not Applicable		
	pH			
	Temperature			
	Conductivity			
	BOD			
	Other process parameters			
	Key monitoring locations			
	Pre-treatment inlet and/or outlet	Not Applicable		
	Final treatment inlet			
	Discharge point (to the environment)			
	Other location			
	7	Monitoring emissions to water (refer to table)		Not Applicable

BATc number		Summary of BAT Conclusion requirement	Status/comment One of the following: Not Applicable, Currently Compliant, Compliant in the future (Only for existing activities within 4 years of publication of BAT conclusions), Not Compliant
	Monitoring parameters depend on waste treatment process(es) involved		
8	Monitoring emissions to air (refer to table) Monitoring parameters depend on waste treatment process(es) involved		Not Applicable
9	Monitoring diffuse emissions of organic compounds to air from processes involving solvents. Use one or a combination of the following:		
	a	Measurement – S6.2 descriptions	Not Applicable
	b	Emissions factor calculation	
	c	Mass balance calculation	
10	Periodically monitor odour emissions where nuisance is expected and/or has been substantiated (monitoring frequency is outlined in BAT 12)		
	Use EN standards e.g. 13725 or 16841		Currently Compliant - Odour will be managed in accordance with the Odour Management Plan. It is not anticipated that the site will be a cause of odour nuisance at nearby sensitive receptors.
	Use equivalent methods e.g. ISO / national / international monitoring standards		
11	Annual monitoring for:		
	- Water, energy and raw materials		Currently Compliant – The Operator has stated that they will monitor the annual consumption of water, energy and raw materials and the annual generation of residues. There is no waste water from the processes on site.
	- Generation of residues and wastewater		
EMISSIONS TO AIR			
12	Set up, implement and review an Odour Management Plan (as part of the site EMS) where nuisance is expected and/or has been substantiated. Include ALL of the following:		

BATc number		Summary of BAT Conclusion requirement	Status/comment One of the following: Not Applicable, Currently Compliant, Compliant in the future (Only for existing activities within 4 years of publication of BAT conclusions), Not Compliant
	Protocol containing actions and timelines		Currently Compliant - Odour will be managed in accordance with the Odour Management Plan. It is not anticipated that the site will be a cause of odour nuisance at nearby sensitive receptors.
	Protocol for conducting odour monitoring (BAT 10)		
	Protocol for response to odour incidents/complaints		
	Odour prevention and reduction programme		
13	Techniques to prevent, or where not practicable reduce odour emissions. Use one or a combination of the following:		Not Applicable
	a.	Minimising residence times (open systems only)	
	b.	Use chemical treatment (N/A if desired output is hampered)	
	c.	Optimising aerobic treatment – see examples. Refer to BAT 36 for wastes other than water-based liquid waste.	
14	Techniques to prevent, or where not practicable reduce diffuse emissions to air, in particular of dust, organic compounds and odour. Use one or a combination of the following:		Currently Compliant - The Operator has stated that dust emissions are unlikely due to all site operations taking place within the main processing building. Dust extraction and occupational emission systems are located internally and recirculate cleaned air in the building. Shredders are equipped with dust suppression systems. Dust and reduction is further achieved on site using the following measures: <ul style="list-style-type: none">- Use of high integrity equipment including mechanical seals;- Regular planned preventative maintenance of all equipment and infrastructure including roller shutter doors;- Regular cleaning of waste storage and treatment areas;
	a.	Minimising potential diffuse emission sources – see examples	
	b.	Select and use high-integrity equipment – see examples	
	c.	Corrosion prevention – see examples	
	d.	Containment, collection and treatment of diffuse emissions – see examples	
	e.	Dampening (with water or fog)	
	f.	Maintenance – see examples	
	g.	Cleaning of waste treatment and storage areas – see examples	
	h.	Leak Detection And Repair (LDAR) programme for organics – S6.2	

BATc number		Summary of BAT Conclusion requirement	Status/comment One of the following: Not Applicable, Currently Compliant, Compliant in the future (Only for existing activities within 4 years of publication of BAT conclusions), Not Compliant
			<div>- Dust abatement is fitted to all plant which may produce dust.</div> <div>The Operator has a Dust Emissions Plan.</div>
15	Use flaring only for safety reasons or non-routine operating conditions (OTNOC). Use <u>both</u> of the following:		Not Applicable
	a.	Correct plant design – see examples	
	b.	Plant management including gas system balancing and advanced process control	
16	Reduce emissions to air when flaring is unavoidable. Use <u>both</u> of the following:		Not Applicable
	a.	Correct design of flaring devices – see examples	
	b.	Monitoring and recording as part of flare management – see examples	
NOISE AND VIBRATION			
17	Set up, implement, and regularly review a Noise and Vibration Management Plan (as part of the EMS) where nuisance is expected and/or has been substantiated. Include <u>ALL</u> of the following:		Currently Compliant – The Operator has stated that noise will be managed in accordance with the noise assessment and Noise Management Plan.
	I.	Protocol with actions and timelines	
	II.	Noise and vibration monitoring plan/protocol	
	III.	Noise & vibration complaint response plan/protocol	
	IV.	Noise and vibration reduction programme	It is not anticipated that the site will be a cause of noise nuisance at nearby sensitive receptors. Vibration has not been considered due to it not being considered a potential issue for the site.

BATc number		Summary of BAT Conclusion requirement		Status/comment One of the following: Not Applicable, Currently Compliant, Compliant in the future (Only for existing activities within 4 years of publication of BAT conclusions), Not Compliant	
18	Techniques to prevent, or where not practicable reduce noise and vibration emissions. Use one or a combination of the following:				
	a.	Appropriate location of equipment and buildings		Currently compliant - BAT will be met by implementing measures A-C. Building location is restricted due to the building being pre-existing, however equipment is operated exclusively indoors, with the exception of HGV deliveries to and from the site, and forklift movement. Operational measures implemented on site include the inspection and maintenance of equipment, closing of doors and windows in the enclosed building, operation of equipment only by experienced staff, and avoidance of noisy activities at night where possible. There are some potentially noisy activities associated with the arrival of HGV vehicles from 6:30am but these are strictly limited and in line with he approved planning conditions at site. The site operates low-noise equipment where possible to further reduce noise impacts.	
	b.	Operational measures – see examples			
	c.	Low-noise equipment – see examples			
	d.	Noise & vibration control equipment – see examples			
	e.	Noise attenuation – see examples			
EMISSIONS TO WATER					
19	Optimise water consumption, reduce wastewater generation and prevent or where not practicable reduce emissions to soil and water. Use one or a combination of the following:				
	a.	Water management – see examples		Not Applicable	
	b.	Water recirculation			
	c.	Impermeable surface			
	d.	Reduce likelihood and impact of tank/vessel overflows and failures – see examples			
	e.	Roofing of waste storage and treatment areas			

BATc number		Summary of BAT Conclusion requirement	Status/comment One of the following: Not Applicable, Currently Compliant, Compliant in the future (Only for existing activities within 4 years of publication of BAT conclusions), Not Compliant
	f.	Segregation of water streams (being mindful of existing plant constraints)	
	g.	Adequate drainage infrastructure	
	h.	Design and maintenance provisions to allow risk-based leak detection and repair. Minimise use of underground components.	
	i.	Appropriate buffer storage capacity (being mindful of existing plant constraints)	
20	Treat wastewater using a combination of:		
	Preliminary, primary and general treatment		
	a.	Equalisation	Not Applicable
	b.	Neutralisation	
	c.	Physical separation	
	Physico-chemical treatment		
	d.	Adsorption	Not Applicable
	e.	Distillation/rectification	
	f.	Precipitation	
	g.	Chemical oxidation	
	h.	Chemical reduction	
	i.	Evaporation	
	j.	Ion exchange	
	k.	Stripping	
	Biological treatment		
l.	Activated sludge process	Not Applicable	

BATc number		Summary of BAT Conclusion requirement	Status/comment One of the following: Not Applicable, Currently Compliant, Compliant in the future (Only for existing activities within 4 years of publication of BAT conclusions), Not Compliant
	m.	Membrane bioreactor	
	Nitrogen removal		
	n.	Nitrification/denitrification (where biological treatment used)	Not Applicable
	Solids removal		
	o.	Coagulation and flocculation	Not Applicable
	p.	Sedimentation	
	q.	Filtration (sand, micro, ultra)	
	r.	Flotation	
EMISSIONS FROM ACCIDENTS AND INCIDENTS			
21	Techniques to prevent or limit the environmental consequences of accidents and incidents, as part of the Accident Management Plan. Use ALL of the following:		
	a.	Protection measures – see examples	Currently compliant - The site has an Accident Management Plan which forms part of their EMS.
	b.	Management of incidental or accidental emissions	The site uses the following techniques to prevent or limit environmental consequences of accidents and incidents: <ul style="list-style-type: none">- Protection measures;- Management of accidental emissions i.e., spillage procedures and containment of fire water; and- Incident/accident system – all accidents will be recorded in the site diary etc.
	c.	Incident/accident registration and assessment system – see examples	

BATc number	Summary of BAT Conclusion requirement	Status/comment One of the following: Not Applicable, Currently Compliant, Compliant in the future (Only for existing activities within 4 years of publication of BAT conclusions), Not Compliant
MATERIAL EFFICIENCY		
22	Use materials efficiently by substituting materials with waste e.g. waste acids/alkalis for pH adjustment, fly ashes for binders	Currently Compliant
ENERGY EFFICIENCY		
23	Use energy efficiently by using <u>both</u> of the following techniques:	
	a.	Energy efficiency plan
	b.	Energy balance record
REUSE OF PACKAGING		
24	Maximise the reuse of packaging as part of a Residues Management Plan (see BAT 1 XII.)	Currently Compliant – The Operator has stated that packaging will be reused wherever possible
MECHANICAL TREATMENT OF WASTE (GENERAL BAT)		

BATc number		Summary of BAT Conclusion requirement		Status/comment One of the following: Not Applicable, Currently Compliant, Compliant in the future (Only for existing activities within 4 years of publication of BAT conclusions), Not Compliant	
25	Reduce emissions to air of dust, particulate-bound metals, PCDD/F and dioxin-like PCBs by applying BAT 14d <u>AND</u> using one or a combination of the following techniques:				
	a.	Cyclone – see S6.1		Currently compliant- The processing equipment is equipped with fabric filter dust extraction systems and a water injection system in order to reduce emissions to air.	
	b.	Fabric filter – see S6.1			
	c.	Wet scrubbing – see S6.1			
	d.	Water injection into the shredder		All dust extraction and occupational emission systems are internally located and recirculate cleaned air internally.	
	BAT-AEL for channelled dust emissions to air from the mechanical treatment of waste (mg/Nm3)				
	Table 6.3 and its supporting note. Monitoring requirements are outlined in BAT 8				
Dust	2.0-5.0		Not Applicable		
MECHANICAL TREATMENT OF METAL WASTE BY SHREDDING					
26	Improve overall environmental performance and prevent emissions due to accidents and incidents. Use BAT 14g <u>AND ALL</u> of the following techniques:				
	(a)	Detailed inspection procedure for baled waste before shredding		Currently compliant - All waste being received by the site is inspected and manually sorted into categories prior to being placed within specific separated and clearly demarcated storage bays. When waste materials are required to be processed, they are transferred from the relevant storage bay and loaded onto a conveyor or suitable workstation for pre-sorting, picking and / or de-packing. All material is sorted into relevant categories and stored within stackable hoppers or stillages. The wastes are stored until there is sufficient material to warrant processing. There is a	
	(b)	Remove dangerous items from waste inputs and dispose of them in a safe manner			
	(c)	Treatment of containers accompanied by a declaration of cleanliness			

BATc number		Summary of BAT Conclusion requirement	Status/comment One of the following: Not Applicable, Currently Compliant, Compliant in the future (Only for existing activities within 4 years of publication of BAT conclusions), Not Compliant
			<p>designated quarantine area for unacceptable wastes prior to offsite removal as soon as possible.</p> <p>Specific actions for inspecting and sorting waste are detailed within the sites waste acceptance and storage procedures.</p>
27	Prevent deflagrations and reduce emissions from deflagrations. Use technique a. <u>AND ONE OR BOTH</u> of techniques b. and c.		
	a.	Deflagration management plan with reduction programme, incident review and response protocol	Currently compliant - The waste acceptance, inspection and sorting procedures identified above will ensure that any potentially dangerous items are removed prior to shredding.
	b.	Pressure relief dampers	
	c.	Pre-shredding (device)	Pressure relief dampers have been fitted to the extraction tower.
28	Use energy efficiently by keeping the shredder feed stable		<p>Currently compliant - The site undertakes pre-inspection of all materials prior to being shredded. The wastes are stored until there is sufficient material to warrant processing through the shredding equipment.</p> <p>As required any material that needs to undergo shredding or mechanical liberation is transferred to the shredding equipment. The shredders are fed via a segmented conveyor which can be hopper fed or manually fed depending on the waste type ensuring that the feed is stable.</p>
PHYSICO-CHEMICAL TREATMENT OF SOLID AND/OR PASTY WASTE			

BATc number	Summary of BAT Conclusion requirement	Status/comment One of the following: Not Applicable, Currently Compliant, Compliant in the future (Only for existing activities within 4 years of publication of BAT conclusions), Not Compliant
40	Improve overall environmental performance by monitoring the waste input as part of the waste pre-acceptance and acceptance procedures. See also BAT 2.	
	Monitoring the waste input	
	Content of organics, oxidising agents, metals, salts, odorous compounds H2 formation potential upon mixing of flue-gas treatment residues/ashes with water	Currently compliant - The Operator has detailed pre-acceptance and acceptance procedures.
41	Reduce emissions to air of dust, organic compounds and NH3 by applying BAT 14d <u>AND</u> using one or a combination of the following techniques:	
	a. Adsorption – see S6.1	Currently compliant The shredding equipment is equipped with a with fabric filter dust extraction system and a water injection system in order to reduce emissions to air.
	b. Biofilter – see S6.1	
	c. Fabric filter – see S6.1.	
	d. Wet scrubbing – see S6.1	All dust extraction and occupational emission systems are internally located and recirculate cleaned air internally