



**APPLICATION FOR AN ENVIRONMENTAL PERMIT
VARIATION UNDER THE ENVIRONMENTAL
PERMITTING (ENGLAND AND WALES) REGULATIONS
2016 (AS AMENDED)**

NON TECHNICAL SUMMARY

CENIN

Previous Winner and Recipient of the Queen's Award for Enterprise for Sustainable Development 2021

**The Research Centre
Parc Stormy
Stormy Down
Bridgend
CF33 4RS**

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ACRONYMS/TERMS USED IN THE TEXT

AD	Anaerobic Digestion
ASCR	Application Site Condition Report
BAT	Best Available Techniques
BRef	Best Available Techniques Reference Document
CCTV	Closed Circuit Television
CENIN	Cenin Limited
DAA	Directly Associated Activities
ECL	Environmental Compliance Limited
ELV	Emission Limit Value
EMS	Environmental Management System
EP Regulations	Environmental Permitting (England and Wales) Regulations 2016 as amended
EP	Environmental Permit EPR/SP3936TL
EPTR	Environmental Permitting Technical Requirements
ERA	Environmental Risk Assessment
H&S	Health and Safety
FPP	Fire Prevention Plan
NTS	Non Technical Summary
NGR	National Grid Reference
NRW	Natural Resources Wales
SCR	Site Condition Report
TPA	Tonnes per Annum
TPD	Tonnes per Day
The Installation	Cenin Cement Production Installation
The Site	The Research Centre, Parc Stormy, Stormy Down, Bridgend, CF33 4RS

1. INTRODUCTION

1.1. Overview

- 1.1.1. Environmental Compliance Limited (“ECL”) has been commissioned by Cenin Limited (“Cenin”) to prepare an Environmental Permit variation application for Permit reference EPR/SP3936TL (“the EP) in relation to their cement, flyash and mineral products site, hereafter referred to as “the Installation”, located at The Research Centre, Parc Stormy, Stormy Down, Bridgend, CF33 4RS (“the Site”).
- 1.1.2. The activities currently undertaken at the Installation comprise the production of cement, flyashes and mineral products using waste fly ash powder from power generation plants. The Production process is an alternative to conventional cement production.
- 1.1.3. The Installation operates under an ISO 14001 Environmental Management system, the overall responsibility for which lies with Cenin’s senior management team.
- 1.1.4. This permit variation application is to allow the following proposed changes:
- addition of R codes to the description of activities;
 - addition of a S5.4 Part A(1)(b) activity to include additional waste treatment operations (pre-processing of glass);
 - addition of a number of waste codes, both hazardous and non hazardous, to be accepted;
 - removal of emission point A2 (diesel generator exhaust); and
 - additional storage and handling method (bulk bags).
- 1.1.5. In addition to the above changes, the proposed variation will include the extension of the permit boundary to incorporate an additional building for storage of bagged, non-combustible waste and of the products.
- 1.1.6. There are no changes proposed to the quantity of waste to be received.
- 1.1.7. In addition to this Non-Technical Summary (“NTS”), the following have been produced to support this EP variation application:
- the relevant Application Forms (Part A, C2, C3 and F1);
 - an Environmental Permitting Technical Requirements Document (“EPTR”) (CENI.01.01/EPTR);
 - an Environmental Risk Assessment (“ERA”) (CENI.01.01/ERA);
 - a Fire Prevention Plan (“FPP”) (CENI.01.01/FPP);
 - a Site Condition Report (“SCR”) (CENI.01.01/SCR); and
 - updated permit drawings.

1.2. Installation Location

- 1.2.1. The Installation is located at The Research Centre, Parc Stormy, Stormy Down, Bridgend, CF33 4RS and centers on National Grid Reference (“NGR”) SS 84118 80084.

- 1.2.2. The Installation is located within an agricultural area adjacent to Severn Trent Green Power South Wales Anaerobic Digestion (“AD”) Facility, quarrying activities, wind turbines and a solar farm.
- 1.2.3. The River Fach is located approximately 1.6km north of the Installation boundary.
- 1.2.4. Residential housing is located to the northeast, southwest and northwest of the Installation, the nearest property being approximately 0.35 km northeast.
- 1.2.5. Open green space and farmland is located to the east and south of the Installation.
- 1.2.6. The indicative location of the Installation is shown in red on Figure 1 below.

Figure 1: Indicative Site Location



1.3. The Applicant

1.3.1. The applicant is Cenin Limited, company number 05626851.

1.4. Pre-Application Advice

1.4.1. A meeting was held with Lewis Evans of Natural Resources Wales (“NRW”) on the 20th May 2026 to discuss the pre application advice request. NRW subsequently confirmed that, in keeping with the existing permit, similar wastes can be stored together as long as they do not react together or pose a fire risk.

2. INSTALLATION ACTIVITIES

2.1. Existing Activities

- 2.1.1. The activities currently undertaken, under Permit Reference EPR/SP3936TL, are detailed in Table 1.

Table 1: Current Permitted Activities

Activity Ref	Activity	Description of Activities	Limits of Activities
A1	S5.3 A(1) (a) (vi) Disposal or recovery of hazardous waste in a facility with a capacity exceeding 10 tonnes per day involving recycling or reclamation of inorganic materials other than metals or metal compounds.	R5: Recycling/ reclamation of inorganic materials other than metal compounds. R13: Storage of wastes pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced Producing cement using waste fly ash powders and air pollution control residues from power generation plants burning paper sludge, wood, plastics and other municipal wastes.	From receipt of waste fly ash and other raw materials to storage of post process cement. Waste types are specified in Table S2.1 (of EPR/SP3936TL)
A2	S5.6 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.	R13: Storage of wastes pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced	Waste types are specified in Table S2.1 (of EPR/SP3936TL)

2.2. Proposed Activities

- 2.2.1. The activities proposed are detailed in Table 2. Changes to existing activities are shown in blue.

Table 2: Proposed Permitted Activities

Activity Ref	Activity	Description of Activities	Limits of Activities
A1	S5.3 A(1) (a) (vi) Disposal or recovery of hazardous waste in a facility with a capacity exceeding 10 tonnes per day involving recycling or reclamation of inorganic materials other than metals or metal compounds.	R4: Recycling/ reclamation of metals and metal compounds R5: Recycling/ reclamation of inorganic materials other than metal compounds. R7: Recovery of components used for pollution abatement R11: Use of wastes obtained from any of the operations numbered R1 to R10 R13: Storage of wastes pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced Producing cement using waste fly ash powders and air pollution control residues from power generation plants burning paper sludge, wood, plastics and other municipal wastes.	From receipt of waste fly ash and other raw materials to storage of post process cement. Waste types are specified in Table S2.1 (of EPR/SP3936TL)
A2	S5.6 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.	R13: Storage of wastes pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced	Waste types are specified in Table S2.1 (of EPR/SP3936TL)
A3	S5.4 Part A(1)(b) Recovery or a mix of recovery and disposal of non-hazardous waste with a capacity exceeding 75 tonnes per day	R4: Recycling/reclamation of metals and metal compounds R5: Recycling/ reclamation of inorganic materials other than metal compounds. R7: Recovery of components used for pollution abatement R11: Use of wastes obtained from any of the operations numbered R1 to R10	From receipt of waste and other raw materials to storage of post process cement.

Table 2: Proposed Permitted Activities (Cont.)

Activity Ref	Activity	Description of Activities	Limits of Activities
As above	As above	R13: Storage of wastes pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced) D15: Storage pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where it is produced) Producing cement using non-hazardous waste.	As above

2.2.2. Detailed descriptions of the changes proposed are provided in Section 4 of this document.

2.2.3. The operating techniques for the existing activities, as detailed in Table S1.2 of the EP, will remain unchanged. It is proposed that the documents included in this variation application will comprise additional Operating Techniques for the pre-processing of glass and storage and handling of bagged waste and will be listed in in any varied permit which the EA is minded to issue.

2.3. Directly Associated Activities

2.3.1. There are no changes to the Directly Associated Activities (DAA's) proposed under this variation.

3. MANAGEMENT TECHNIQUES

3.1. Technical Competence

- 3.1.1. All employees will be appropriately trained to ensure they can undertake their roles and responsibilities in a safe manner. All employees will undertake an induction programme, as well as job role specific training. All certificates are held on record for the individual.
- 3.1.2. A Technically Competent Manager (“TCM”) will be on site during operational hours. The TCM holds CIWM WAMITAB award TCM- Treatment Hazardous Waste.
- 3.1.3. The design and maintenance of infrastructure, plant and equipment is undertaken by competent people in-house, or where required specialist contractors are employed.

3.2. Management System Overview

- 3.2.1. Cenin operate an Environmental Management System (“EMS”) which is externally certified to ISO 14001.
- 3.2.2. The overall responsibility for ensuring that the requirements of the Environmental Permit are met and achieving continual improvements in environmental performance lies with the Managing Director of Cenin. Managers and Supervisors have the prime responsibility for ensuring the management processes are implemented. The Health and Safety (“H&S”) Manager has overall responsibility for environmental matters at the Installation.

3.3. EMS Amendments Taking Account of the Variation Proposals

- 3.3.1. The EMS will be reviewed to take account of the permit variation to ensure it remains appropriate and effective. The changes to the EMS will be documented and communicated to all employees

4. OPERATING TECHNIQUES

4.1. Technical Standards

- 4.1.1. The NRW online guidance has been considered as part of this application and the following appropriate measures are considered relevant to the proposed operations have been taken into account:
- BAT Conclusions for Waste Treatment¹ ;
 - Sector Guidance Note S5.06 Recovery and Disposal of Hazardous and Non hazardous Waste²

4.2. Current Activities

- 4.2.1. Cenin produce cement, flyashes and mineral products using waste fly ash powder from power generation plants The Production process is an alternative to conventional cement production.
- 4.2.2. Processing of waste is undertaken within fully enclosed mills, mixers, screws, silos and conveyors. The processing equipment is located within a large, fully enclosed building designed to prevent water ingress and fugitive dust release. Air from the milling operation is cleaned using a bag filtration system prior to discharged through a stack located on the roof of the building.

4.3. Proposed Activities: Overview

- 4.3.1. There will be no change in the total throughput of the Installation as a result of the proposed variation, which will remain at a maximum of 75,000 tonnes per annum (“tpa”). The maximum daily throughput will be 200 tonnes per day (tpd) of non-hazardous waste and 110 tpd of Hazardous waste.
- 4.3.2. No more than 4,400 tonnes of waste in total will be stored at the Installation at any one time.
- 4.3.3. Although additional waste types will be added to the EP under this variation, this will not result in an increase in the throughput of the Facility, but will allow more variability in the waste which can be used to produce the final product
- 4.3.4. The new waste codes proposed to be accepted (as detailed in Table 3) will be stored in the existing silos and bays and will continue to benefit from the permitted control measures in place. In addition, there will be 3 new bays installed for non-powdery waste located externally to the process building.

¹

https://assets.publishing.service.gov.uk/media/66018450a6c0f7bb15ef91e2/CD7.4.N_GR13___Best_Available_Techniques___BAT___Reference_Document_for_Waste_Treatment.pdf

² <https://www.gov.uk/government/publications/sector-guidance-note-s506-recovery-and-disposal-of-hazardous-and-non-hazardous-waste>

- 4.3.5. There are no changes proposed to any of the existing processes undertaken at the Installation. The new waste types proposed to be accepted will be handled following the same procedures and will undergo the same processing as the existing waste types. All existing environmental control measures specified within the EP will remain in place and will be applicable to the new waste types received.
- 4.3.6. Under the variation, it is proposed that non-combustible waste may be accepted in sealed 2 tonne bulk bags which would be stored in the new storage building (“the storage building”) to be located within the proposed extension area.
- 4.3.7. There will be an additional waste handling method introduced for those wastes stored in bulk bags within the storage building and for wastes delivered to the Installation in bulk bags. This will involve the use of a debagging machine connected to designated silos with local dust extraction in place to allow the bags to be emptied whilst minimising emissions of dust.
- 4.3.8. In addition to the ongoing existing activities, there will be a new activity which will involve treatment of non-hazardous glass waste by crushing in an enclosed hammer mill prior to being blown into a silo from where it will be fed into the existing process.
- 4.3.9. There will be no change in the operating hours as a result of this variation.

4.4. Proposed Activities: Additional Waste Codes

- 4.4.1. It is proposed that the additional waste codes detailed in Table 3 will be accepted under the varied permit.
- 4.4.2. The relevant listed activity (as detailed in Table 2) and the storage method for each of the proposed additional waste codes are also shown in Table 3.

Table 3: Waste Codes to be Accepted

CODE AND DESCRIPTION	STORAGE LOCATION	ACTIVITY
WASTES RESULTING FROM EXPLORATION, MINING, QUARRYING, AND PHYSICAL AND CHEMICAL TREATMENT OF MINERALS		
01 03 wastes from physical and chemical processing of metalliferous minerals		
01 03 08 dusty and powdery wastes other than those mentioned in 01 03 07	Sealed silo's (and bulk bags)	A3
01 03 09 red mud from alumina production other than the wastes mentioned in 01 03 10	Storage bays	A3
01 04 wastes from physical and chemical processing of non-metalliferous minerals		
01 04 07* wastes containing hazardous substances from physical and chemical processing of non-metalliferous minerals	Sealed silo's (and bulk bags)	A1, A2
01 04 09 waste sand and clays	Storage bays	A3
01 04 10 dusty and powdery wastes other than those mentioned in 01 04 07	Sealed silo's (and bulk bags)	A3
02 WASTES FROM AGRICULTURE, HORTICULTURE, AQUACULTURE, FORESTRY, HUNTING AND FISHING, FOOD PREPARATION AND PROCESSING		
02 04 wastes from sugar processing		
02 04 02 off-specification calcium carbonate	Sealed silo's (and bulk bags)	A3
03 WASTES FROM WOOD PROCESSING AND THE PRODUCTION OF PANELS AND FURNITURE, PULP, PAPER AND CARDBOARD		
03 03 Wastes from pulp, paper and cardboard production and processing		
03 03 07 mechanically separated rejects from pulping of waste paper and cardboard	External Storage bays	A3
03 03 09 lime mud waste	Storage bays	A3
03 03 10 fibre rejects, fibre-, filler- and coating-sludges from mechanical separation	External Storage bays	A3
03 03 11 Sludges from on-site effluent treatment other than those mentioned in 03 03 10	External Storage bays	A3
04 WASTES FROM THE LEATHER, FUR AND TEXTILE INDUSTRIES		
04 01 Wastes from the leather and fur industries		
04 01 02 liming waste	Storage bays	A3
10 WASTES FROM THERMAL PROCESSES		
10 01 wastes from power stations and other combustion plants (except 19)		
10 01 04* oil fly ash and boiler dust	Sealed silo's (and bulk bags)	A1, A2
10 01 14* bottom ash, slag and boiler dust from co-incineration containing hazardous substances	Sealed silo's (and bulk bags)	A1, A2
10 01 16* fly ash from co-incineration containing hazardous substances	Sealed silo's (and bulk bags)	A1, A2

Table 3: Waste Codes to be Accepted (Cont.)

CODE AND DESCRIPTION	STORAGE LOCATION	ACTIVITY
10 03 wastes from aluminium thermal metallurgy		
10 03 05 waste alumina	External Storage bays	A3
10 03 20 Flue-gas dust other than those mentioned in 10 03 19	Sealed silo's	A3
10 03 30 wastes from treatment of salt slags and black drosses other than those mentioned in 10 03 29	External Storage bays	A3
10 05 wastes from zinc thermal metallurgy		
10 05 03* flue-gas dust	Sealed silo's	A1, A2
10 05 04 other particulates and dust	Sealed silo's	A3
10 07 wastes from silver, gold and platinum thermal metallurgy		
10 07 04 other particulates and dust	Sealed silo's	A3
10 08 wastes from other non-ferrous thermal metallurgy		
10 08 04 particulates and dust	Sealed silo's	A3
10 09 wastes from casting of ferrous pieces		
10 09 03 furnace slag	External Storage bays	A3
10 09 06 casting cores and moulds which have not undergone pouring other than those mentioned in 10 09 05	External Storage bays	A3
10 09 08* flue-gas dust containing hazardous substances	Sealed silo's	A1, A2
10 09 12 other particulates other than those mentioned in 10 09 11	Sealed silo's	A3
10 10 wastes from casting of non-ferrous pieces		
10 10 09* flue-gas dust containing hazardous substances	Sealed silo's	A1, A2
10 10 11* other particulates containing hazardous substances	Sealed silo's	A1, A2
10 10 12 other particulates other than those mentioned in 10 10 11	Sealed silo's	A3
10 11 wastes from manufacture of glass and glass products		
10 11 12 waste glass other than those mentioned in 10 11 11	Storage bays	A3
10 11 15* solid wastes from flue-gas treatment containing hazardous substances	Storage bays	A1, A2
10 12 wastes from manufacture of ceramic goods, bricks, tiles and construction products		
10 12 03 particulates and dust	Sealed silo's (and bulk bags)	A3

Table 3: Waste Codes to be Accepted (Cont.)

CODE AND DESCRIPTION	STORAGE LOCATION	ACTIVITY
10 13 wastes from manufacture of cement, lime and plaster and articles and products made from them		
10 13 04 wastes from calcination and hydration of lime	Sealed silo's (and bulk bags)	A3
10 13 06 particulates and dust (except 10 13 12 and 10 13 13)	Sealed silo's (and bulk bags)	A3
10 13 11 wastes from cement-based composite materials other than those mentioned in 10 13 09 and 10 13 10	Sealed silo's (and bulk bags)	A3
10 13 12* solid wastes from gas treatment containing hazardous substances	Storage bays	A1, A2
WASTES FROM CHEMICAL SURFACE TREATMENT AND COATING OF METALS AND OTHER MATERIALS; NON-FERROUS HYDROMETALLURGY		
11 02 Wastes from non-ferrous hydrometallurgical processes		
11 02 03 Wastes from the production of anodes for aqueous electrolytical processes	Storage bays	A3
12 WASTES FROM SHAPING AND PHYSICAL AND MECHANICAL SURFACE TREATMENT OF METALS AND PLASTICS		
12 01 wastes from shaping and physical and mechanical surface treatment of metals and plastics		
12 01 04 non-ferrous metal dust and particles	External Storage bays	A3
16 WASTES NOT OTHERWISE SPECIFIED IN THE LIST		
16 01 end-of-life vehicles from different means of transport (including off-road machinery) and wastes from dismantling of end-of-life vehicles and vehicle maintenance (except 13, 14, 16 06 and 16 08)		
16 01 20 glass	Internal Storage bays	A3
17 CONSTRUCTION AND DEMOLITION WASTES (INCLUDING EXCAVATED SOIL FROM CONTAMINATED SITES)		
17 02 wood, glass and plastic		
17 02 02 glass	Internal Storage bays	A3
17 08 gypsum-based construction material		
17 08 01* gypsum-based construction materials contaminated with hazardous substances	External Storage bays	A1, A2
17 08 02* gypsum-based construction materials other than those mentioned in 17 08 01	External Storage bays	A3

Table 3: Waste Codes to be Accepted (Cont.)

CODE AND DESCRIPTION	STORAGE LOCATION	ACTIVITY
19 WASTES FROM WASTE MANAGEMENT FACILITIES, OFF-SITE WASTE WATER TREATMENT PLANTS AND THE PREPARATION OF WATER INTENDED FOR HUMAN CONSUMPTION		
19 01 wastes from incineration or pyrolysis of waste		
19 01 02 ferrous materials removed from bottom ash	Storage bays	A3
19 01 11* bottom ash and slag containing hazardous substances	Storage bays	A1, A2
19 01 12 bottom ash and slag other than those mentioned in 19 01 11	Storage bays	A3
19 02 wastes from physico/chemical treatments of waste (including dechromatation, decyanidation, neutralisation)		
19 02 05* sludges from physico/chemical treatment containing hazardous substances	Storage bays	A1, A2
19 04 vitrified waste and wastes from vitrification		
19 04 02 fly ash and other flue-gas treatment wastes	Sealed silo's (and bulk bags)	A3
19 12 wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified		
19 12 02 ferrous metal	External Storage bays	A3
19 12 05 glass	Internal Storage bays	A3
19 12 12 other wastes (including mixtures of materials) from mechanical treatment of wastes other than those mentioned in 19 12 11	Storage Bays	A3
20 MUNICIPAL WASTES (HOUSEHOLD WASTE AND SIMILAR COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL WASTES) INCLUDING SEPARATELY COLLECTED FRACTIONS		
20 01 separately collected fractions (except 15 01)		
20 01 02 glass	Internal Storage bays	A3
20 01 40 metals	External Storage bays	A3

4.5. Proposed New Activity

- 4.5.1. In addition to the ongoing existing activities detailed in Table 1, under the proposed permit variation there will be a new Section 5.4 Part A(1)(b) activity which will comprise treatment of non-hazardous glass waste by crushing in a hammer mill prior to being fed into the existing process. The new activity will be applicable to the following waste codes which are described in full in Table 3:
- 16 01 20 ;
 - 17 02 02;
 - 19 12 05; and
 - 20 01 02.
- 4.5.2. The glass waste will be delivered to the Installation in tipper trucks or intermediate bulk containers (“IBCs”) and will be unloaded directly into one of the bays located within the enclosed process building, on completion of waste acceptance checks.
- 4.5.3. The glass waste will be fed, using a telehandler, into the hammer mill within the process building . The hammer mill will be fully enclosed and fitted with a self-contained air suction filtration system which will blow the processed glass into a sealed silo with its own reverse jet air filtration system. The processed glass will then be fed into the existing process which benefits from the permitted control measures.
- 4.5.4. There will be no point source emissions from the proposed new activity. Fugitive emissions will be controlled via the sealed filtration systems on the hammer mill and silo.
- 4.5.5. The process building is insulated and cladded which will minimise noise from the glass crushing activity.
- 4.5.6. Any materials found within the glass, such as bottle tops and paper, will be sent off site to be recycled (where possible).

4.6. Extension to Permit Boundary

- 4.6.1. The permit boundary will be extended to include an additional building for storage of bagged, non-combustible waste and products There will also be a diesel storage tank located within the storage building. The storage building is fully enclosed, lockable and benefits from impermeable surfacing which is isolated from the drainage system.
- 4.6.2. The external area within the proposed extension area is surfaced with concrete and isolated from the drainage system There is security fencing around the boundary of the extension area and signage will be put in place.

- 4.6.3. The diesel storage tank will be self-bunded, the volume of the bund comprising 110% of the total tank volume.

4.7. Waste Pre-Acceptance Arrangements

- 4.7.1. There are no changes proposed to the existing waste pre-acceptance procedures.

4.8. Waste Acceptance Arrangements

- 4.8.1. There are no changes proposed to the existing waste acceptance arrangements.

4.9. Quarantine Area

There will be no change to the size, location or engineering of the quarantine area.

4.10. Waste Tracking and Recording

- 4.10.1. There are no changes proposed to the waste tracking and recording arrangements.

4.11. Waste Handling and Storage

- 4.11.1. The storage arrangements for each proposed new waste type, (by LoW code) to be accepted at the Installation are detailed in Table 3.
- 4.11.2. For those LoW codes, both hazardous and non hazardous, which will be stored in silos, there will be no change to the existing permitted handling and storage procedures
- 4.11.3. There will be 3 new waste storage bays located externally to the process building The waste storage bays are located on impermeable surfacing with sealed drainage. The waste storage bays will be used only for non-dusty waste types with limited leaching potential. Waste will be moved from the bays into the mill feed bin using a front loaded excavator.
- 4.11.4. The glass waste, which will be processed in the hammer mill, will be stored within the process building, within one of the existing bays. The glass will be tipped directly into the bay minimising any noise emissions. The glass waste will be fed into the hammer mill using a telehandler. All storage and processing of the glass waste will be enclosed within the process building.
- 4.11.5. The storage building will be used for the storage of non-combustible wastes delivered in sealed, 2 tonne bulk bags. These waste codes will generally be delivered by powder tankers directly into the silos, however on occasion these waste types may be delivered in smaller bags. The bags will be stored within the enclosed building, which has an impermeable surface and is isolated from the drainage system. The bulk bags will be inspected regularly to check for any leaks or degradation of the packaging.

- 4.11.6. There will be an additional waste handling method introduced for those wastes stored in bulk bags within the storage building and for waste received under LoW code 01 04 10 which will be delivered to the Installation in 2 tonne bulk bags. This will involve the use of a debagging machine connected to designated silos with local dust extraction in place to allow the bags to be emptied whilst minimising emissions of dust. The existing reverse air jet filter system on the silos will be used to control emissions to atmosphere during the debagging process. The waste will be moved from the storage building to the debagging machine in the sealed bags using a telehandler.
- 4.11.7. Hazardous and non-hazardous waste will be stored separately, in designated, clearly labelled silos and bulk bays. To ensure that there are no reactions between incompatible materials, waste received under different waste codes will not be mixed within the silos or storage bays.
- 4.11.8. Processing at the Installation is undertaken using a batch system, dependant on the waste materials available at that time and the product demand. Therefore, the waste type stored in each individual silo and storage bay is subject to change. Cenin have in place a silo plan, which is a dynamic document which details which waste is being stored in which silo and bay at any given time. The signage on the individual silos and bays is mobile and updated in accordance with the silo plan.
- 4.11.9. All waste storage and treatment areas, equipment and containers are regularly inspected and cleaned if required. Any residues collected during cleaning are disposed of as required.
- 4.11.10. Any activities that may represent a clear fire risk are not undertaken within any waste storage area. Examples include:
- smoking;
 - parking of normal road vehicles except while unloading or loading; and/or
 - recharging batteries.
- 4.11.11. All staff will be trained in the correct handling of waste, to minimise any damage to the integrity of containers or individual items.

4.12. Site Security and Traffic Management

- 4.12.1. There will be no changes to the site security or traffic management measures for the area within the existing permit boundary as part of this proposed variation.
- 4.12.2. The proposed extension area has perimeter fencing to a height of 2 metres in place to prevent unauthorised or accidental access to the Installation.
- 4.12.3. The Installation is covered by 24 hour CCTV with external monitoring both during working hours and out of hours.

4.13. Contingency Plans

- 4.13.1. In the unlikely event that site operations are disrupted, contingency arrangements are in place. No further waste will be accepted at the Facility unless there is sufficient capacity or there is a clearly defined method of disposal/recovery.
- 4.13.2. The Installation will continue to comply with all permit conditions and operating procedures during maintenance and/or shutdowns.

4.14. Installation Decommissioning

- 4.14.1. The Installation has been designed to ensure that it can be decommissioned safely in a manner which will avoid any pollution risk and return the site to a satisfactory state. In this instance, this means returning the site to the environmental condition that prevailed prior to Environmental Permit issue as established in the Site Condition Report (CENI.01.01/SCR)

5. RAW MATERIALS

5.1. Raw Materials

- 5.1.1. The process undertaken at the Installation focuses on the use of waste in place of raw materials. As such the main raw material used is diesel for fuelling site plant and equipment. The diesel will be stored in a 10,000l self-bunded tank within the storage building.
- 5.1.2. On occasion, clean aggregate is used as part of the end product blend. The following quantities may be used:
- Maximum of 200 tonnes stored on site at any time in storage bays;
 - 150 tonnes maximum amount used daily;
 - 34, 500 tonnes maximum amount used annually;
- 5.1.3. The aggregate is used within the production process, as required, and is mixed into the product blend during the milling process. The amount of raw aggregate used is dependent on the individual product recipes and the properties of the waste types available at that time.

6. EMISSIONS

6.1. Point Source Emissions to Air

- 6.1.1. The diesel generator is no longer in place and therefore emission point A2: diesel generator exhaust no longer exists and should be removed from the permit.
- 6.1.2. There will be changes to the remaining point source emissions to air proposed as part of this variation application.

6.2. Point Source Emissions to Surface Water and Sewer

- 6.2.1. There are currently no point source emissions to surface water or sewer and no changes are proposed as part of this variation application. This includes from the proposed extension area.

6.3. Point Source Emissions to Land and Groundwater

- 6.3.1. There are currently no point source emissions to land or groundwater and no changes are proposed as part of this variation application.
- 6.3.2. The permit extension area, both the storage building and external area, are sealed with an impervious barrier to prevent a pollution pathway to land or groundwater.

6.4. Fugitive Emissions

- 6.4.1. Control measures for fugitive emissions from the currently permitted activities are specified within the EP and compliance will be maintained. The storage, handling and processing of the additional hazardous and non-hazardous LoW codes will be subject to these controls

Fugitive Emissions to Air – Dust and Particulates

- 6.4.2. Wastes which will be delivered in dry, sealed jumbo bags will be transferred to the debagging device which will empty the bag into the silo. Any dust from the process is sucked away by a local fan on top of the bagging machine and blown into the silo for reuse. The existing reverse air jet filter system on the silo is used to further control emissions to atmosphere from filling of the silo.
- 6.4.3. Only non-dusty waste will be stored within the external bays. Robust waste pre acceptance and waste acceptance procedures are in place to ensure that the composition and physical properties of all incoming wastes are suitable for storage within the external bays.
- 6.4.4. The glass wastes will be stored, transferred and processed in the enclosed processing building preventing any emissions of dust or particulates.

Fugitive Emissions - Noise

- 6.4.5. The low density of the dusty and powdery waste proposed to be accepted in Jumbo bags, means that the debagging process into the silo will not be noisy. Notwithstanding this, the use of the debagging machine means that drop heights into the silo are reduced helping control noise emissions. The waste is transferred directly into the silo which will contain the noise and provide a shield to prevent noise travelling to sensitive receptors.
- 6.4.6. To prevent noise emissions from the receipt and pre-processing of glass waste, the waste will be delivered directly into the enclosed process building, which is fitted with cladding and insulation which provides a sound barrier. Within the process building, the glass will be treated in the hammer mill which is fully enclosed to contain sound.
- 6.4.7. Any significant increase in the noise levels will be reported to the management team and investigated. Any complaints will be recorded in the company's complaints log and be investigated accordingly.

6.5. Fugitive Emissions to Surface Water and Sewer

- 6.5.1. There will be no additional sources of fugitive emissions to surface water or sewer resultant from the proposed variation. The proposed activities are dry processes which do not use or produce any water or process effluent.
- 6.5.2. With the exception of the 3 external storage bays, all waste will be stored within enclosed buildings or in sealed silos. All processing is undertaken within an enclosed building. There is therefore no mechanism for waste to come into contact with rainwater to generate contaminated run off.
- 6.5.3. There is a drainage channel located around the external storage bays which collects any rainwater run off. The drainage channel runs into a sealed rainwater collection system. The water is removed from site via tanker to a suitable licenced facility.
- 6.5.4. The building and external areas within the proposed extension to the EP boundary benefit from impermeable surfacing and are isolated from the drainage system. There will therefore be no fugitive emissions to sewer or surface water from the proposed extension area.

6.6. Fugitive Emissions to Groundwater or Land

- 6.6.1. There will be no additional sources of fugitive emissions to groundwater or land introduced under the proposed variation. The existing control measures, required by the EP will remain in place.
- 6.6.2. The debagging of dusty waste, the storage and processing of glass waste and the storage of non-dusty waste in external bays will be undertaken in areas sealed with an impervious barrier to prevent a pollution pathway to groundwater or the land beneath the Installation

7. GENERAL REQUIREMENTS

7.1. Emissions Management

- 7.1.1. The ERA submitted with this application has demonstrated that emissions of substances not controlled by emission limits (i.e. fugitive emissions) are not considered to be significant, consequently, an Emissions Management Plan is not required as part of this variation application.

7.2. Odour Management

- 7.2.1. It is not considered that the additional activity proposed by this variation application will result in any odour nuisance at sensitive receptors.
- 7.2.2. Consequently, an Odour Management Plan is not considered to be required.

7.3. Noise and Vibration Management

- 7.3.1. It is not considered that the changes proposed as part of this variation will result in noise nuisance being experienced by sensitive receptors in the surrounding area.
- 7.3.2. The ERA has demonstrated that with strict adherence to the control measures set out in the ERA, risk of noise emissions beyond the Installation EP boundary is not considered to be significant. Consequently, a Noise Management Plan is not required as part of this application.

7.4. Fire Prevention Plan

- 7.4.1. As per the requirements of the EA's Fire Prevention Plan ("FPP") online guidance³, a FPP (Document reference CENI.01.01/FPP) has been prepared and is submitted with this application.

7.5. Pest Management Plan

- 7.5.1. It is not considered that the activities proposed will result in any risk of pest attraction to the Installation nor nuisance being experienced by sensitive receptors in the surrounding area. Consequently, a Pest Management Plan is not required.

³ EA 'Fire Prevention Plans: environmental permits', available online at <https://www.gov.uk/government/publications/fire-prevention-plans-environmental-permits/fire-prevention-plans-environmental-permits>, accessed November 2025.

8. MONITORING

8.1. Monitoring of Emissions to Air

- 8.1.1. There are no changes to the point source emissions to air associated with this variation. Therefore, no additional air emissions monitoring is proposed.

8.2. Monitoring of Soil and Groundwater

- 8.2.1. There are no point source emissions to soil or groundwater introduced by the proposed variation. Therefore, no monitoring of soil or groundwater is proposed

8.3. Monitoring of Emissions to Surface Water and Sewer

- 8.3.1. There are no point source emissions to surface water introduced by the proposed permit variation. Therefore, no monitoring of emissions to surface water or sewer is proposed.

9. RESOURCE EFFICIENCY AND CLIMATE CHANGE

9.1. Basic Measures for Improving Energy Efficiency

- 9.1.1. The Installation remains a front-runner in sustainable operations and is powered entirely by on-site renewable energy (a combination of wind, solar and gas generated by anaerobic digestion ("AD"), and supported by Tesla battery storage with a capacity of 600MW) with zero reliance on the grid. Continuous improvements are tracked through a formal plan.
- 9.1.2. While further improvements in energy efficiency are limited due to the advanced systems already in place, Cenin remain committed to continuous development and are actively exploring new product ranges, increased use of waste materials, and future EV HGV integration.

9.2. Breakdown of any changes to the energy your activities Use and Create

- 9.2.1. The Installation does not import any electricity from the national grid and will not need to do so under the proposed variation. There is more power generated by the wind turbines and the solar panels, than is used at the Installation.
- 9.2.2. The Tesla battery has been installed to ensure that no electricity needs to be imported to the Installation in times of no power generation. This infrastructure ensures that the site will not need to rely on grid electricity in the future.

9.3. Climate Change Levy Agreement

- 9.3.1. The Installation will not be party to a Climate Change Agreement but will implement all energy saving measures as detailed above.

9.4. Efficient Use of Raw and Other Materials

- 9.4.1. The operations undertaken at the Facility use waste in place of raw materials to produce cement and building products, thus reducing the use of raw materials both at the Installation and across the building industry as a whole. For every 1 tonne of waste that Cenin recycles, 2 tonne less cement is produced by industry which means 3 tonne less limestone is quarried. This results in a saving of 2 tonnes in carbon dioxide emissions. The introduction of the additional waste types proposed under the permit variation will allow further flexibility in the products which can be made and hence further reduce the use of non-waste materials.
- 9.4.2. The process does not use any water and will not use any under the proposed variation.

9.5. Waste/Residue Minimisation

Overview

- 9.5.1. Cenin reduces the waste produced and the resources used at the Installation through the replacement of raw materials with waste, the efficiency of the design of the process and the use of renewable energy to power the Installation. The process focuses on the use of waste to create a usable product thus reducing the volume of waste sent to landfill and the quantity of raw materials used in the production of cement and other building materials.

Residue Management

- 9.5.2. Minimal waste is produced at the Installation. The technology used can adjust the properties of the products (e.g. strength, setting time), helping match materials precisely to needs, thus ensuring a highly efficient process. There is therefore no residue management plan required.
- 9.5.3. General office waste and any materials found within the glass, such as bottle tops and paper, will be sent off site to be recycled (where possible).
- 9.5.4. Wherever possible, IBC's used to store additives are returned to the supplier for re-use

Waste Minimisation Audits

- 9.5.5. A waste minimisation audit will be carried out at least every four years. The information obtained from the audit(s) will be used to identify opportunities for improved efficiency and reduced waste production.

10. COMPLIANCE WITH BAT CONCLUSIONS

10.1. Appropriate BAT Conclusions –

- 10.1.1. It is considered that the Facility will be operated in accordance with the techniques detailed in the 'Best Available Techniques Reference Documents (BREF) for Waste Treatment' and the applicable sections (Section 2.1.3 (storage)) of 'Sector Guidance Note S5.06 recovery and disposal of hazardous and non-hazardous waste'.