

Variation notice with introductory note

Environmental Permitting (England & Wales) Regulations 2007

Gwent Waste Management Centre

Tradebe (Gwent) Ltd
Corporation Road
Newport
NP19 4RD

Variation notice number
EA/EPR/SP3531SK/V002

Permit number
SP3531SK

Gwent Waste Management Centre

Permit Number SP3531SK

Introductory note

This introductory note does not form a part of the permit

The following notice, which is issued pursuant to regulation 20 and Part 1 of Schedule 5 of the Environmental Permitting (England and Wales) Regulations S.I.2007 No. 3538 (the Regulations), gives notice of the variation of an environmental permit to operate a regulated facility.

The installation carries out a variety of waste disposal and recovery processes, and can accept a wide variety of hazardous and non-hazardous wastes which arrive in containers or in bulk road tankers. Pre-acceptance checks and analysis carried out on the wastes determine the storage, treatment, recovery or disposal activity within the installation. Containerised wastes are stored and segregated, according to their types and properties, within a designated transfer facility building. They are either transferred off-site for recovery or disposal at another facility, regulated under a waste management licence, or introduced into the treatment plant at the installation.

The transfer facility is also equipped with drum washing and crushing facilities to enable the re-use and recycling of metal and plastic drums or containers.

The treatment plant is situated within the main process building and is capable of carrying out a number of treatment processes, including neutralisation of aqueous acidic and alkaline wastes and the precipitation of insoluble metal hydroxides using calcium hydroxide. Cyanide wastes are oxidised with sodium hypochlorite, in designated reaction tanks within the main process building, to produce cyanate ions which react further to produce carbon dioxide and nitrogen. The resulting liquid waste is then transferred to the main treatment system for the precipitation and removal of metals prior to discharge to sewer.

Waste oils and oil/water mixtures are separated by settlement and decanting techniques within the main process building. The recovered oil is despatched for further treatment and/or use as an alternative fuel at another facility. The separated water is processed through the treatment plant prior to discharge to sewer.

This variation is to allow the development of extensions and improvements to the existing treatment facility. These will include:

- Development of the existing oxidation treatment system to enable smaller batches to be processed and incorporate control features in line with BAT guidance.
- Installation of a catalytic oxidation reactor and associated storage to enable selective treatment of existing streams (e.g. phenolic caustic) and other similar wastes.
- Development of the ammonia stripping system by displacement of ammonia by air and capture in acid.
- Development of a chemical stabilisation process as pre-treatment prior to recovery or disposal of waste.
- The installation of BAT treatment using activated carbon and biological effluent treatment to target COD/Ammonia reduction capacity less than 50m³ per day.
- Development of the current facility by installation of a dedicated alkali dispersion system for solid alkali wastes.
- Relocation of the existing skip store to a purpose built covered storage facility adjacent to the transfer station for waste stored in open skips.
- Installation of a purpose built skip waste reception facility adjacent to the transfer station for hazardous waste contaminated general waste.
- Review of the transfer station storage profile in line with BAT/HSG 51/71 and optimised covered storage.

Schedule 1 of this notice lists any deleted conditions, Schedule 2 lists any amended conditions and Schedule 3 lists any conditions that have been added.

Status Log of the permit		
Detail	Date	Response Date
Application SP3531SK	Duly made 24/08/05	
Additional Information Received	24/03/06	12/05/06 and 15/05/06
Permit determined	26/06/06	
Application for variation EA/EPR/SP3531SK/V002	Duly made 27/06/08	
Variation EA/EPR/SP3531SK/V002 issued	13/10/08	

End of Introductory Note

Notice of variation

Environmental Permitting
(England and Wales) Regulations 2007

Permit number

SP3531SK

The Environment Agency in exercise of its powers under Regulation 20 of the Environmental Permitting (England and Wales) Regulations 2007 (SI 2000 No 3538) varies the permit as set out below.

Tradebe (Gwent) Ltd ("the operator"),

whose registered office is

**Whittle Close
Engineer Park
Sandycroft
Deeside
Flintshire
CH5 2QE**

company registration number **00171493**

holds a permit to operate a regulated facility at

**Gwent Waste Management Centre
Corporation Road
Newport
Gwent
NP19 4RD**

and that permit is varied to the extent set out in Schedules 1 to 3 of this notice.

The notice shall take effect from 13th October 2008

Name	Date
Andrew Gibbs 	13/10/2008

Authorised on behalf of the Agency

Schedule 1 – conditions to be deleted

None

Schedule 2 – conditions to be amended

The following conditions are amended as follows:

2.2 The site

- 2.2.1 The activities shall not extend beyond the site, being the land shown edged with a dotted line on the site plan at schedule 2 to this permit.

2.5 Improvement programme

- 2.5.1 The operator shall complete the improvements specified in schedule 1 table S1.3 by the date specified in that table unless otherwise agreed in writing by the Agency.
- 2.5.2 Except in the case of an improvement which consists only of a submission to the Agency, the operator shall notify the Agency within 14 days of completion of each improvement.

2.6 Pre-operational conditions

- 2.6.1 The operations specified in schedule 1 table S1.6 shall not commence until the measures specified in that table have been completed.

Schedule 1 – Operations

Table S1.1 activities		
Activity listed in Schedule 1 of the Environmental Permitting Regulations	Description of specified activity and WFD Annex IIA and IIB operations	Limits of specified activity and waste types
S5.3 A(1)(a)	D14 , Repackaging – over drumming & recontainerising of wastes for transfer pending onward disposal.	Transfer Facility (500 tonnes) In the location specified in the site drawing, Figure 3(C) Detail of the transfer station, in Appendix 1 of the variation application.
	D13 , Mixing of blending – mixing or blending compatible wastes with same properties and hazard.	Wastes specified in schedule 3, table S3.2
	D9 , Physico-chemical treatment – neutralisation, precipitation, flocculation, saponification, filtration, carbon absorption reduction, oxidation and stabilisation. D13 , Mixing or blending – mixing or blending compatible wastes prior to physico-chemical treatment. D15 , Storage pending disposal – storage prior to mixing or blending and/or physico-chemical treatment.	Treatment Plant (5254m ³) consisting of the following tanks: Tanks 1 to 19 (3533m ³) Tank 20 (280m ³) Tank 21 (435m ³) Tank 22 (435m ³) Tank 26 (56m ³) Sump 27 / 28 (65m ³) Tanks 33 a/b (20m ³) Tanks 51 to 55 (153m ³) Tank 56 (30m ³) Tank 57 (30m ³) Tank 58 (5m ³) Tanks 60 to 63 (76m ³) Tank 64 & 65 (40m ³) Also some small storage vessels, filter presses and sumps (96m ³) In the location specified in the site drawing, Figure 6(A) Drawing showing storage and treatment tank layout, in Appendix 1 of the

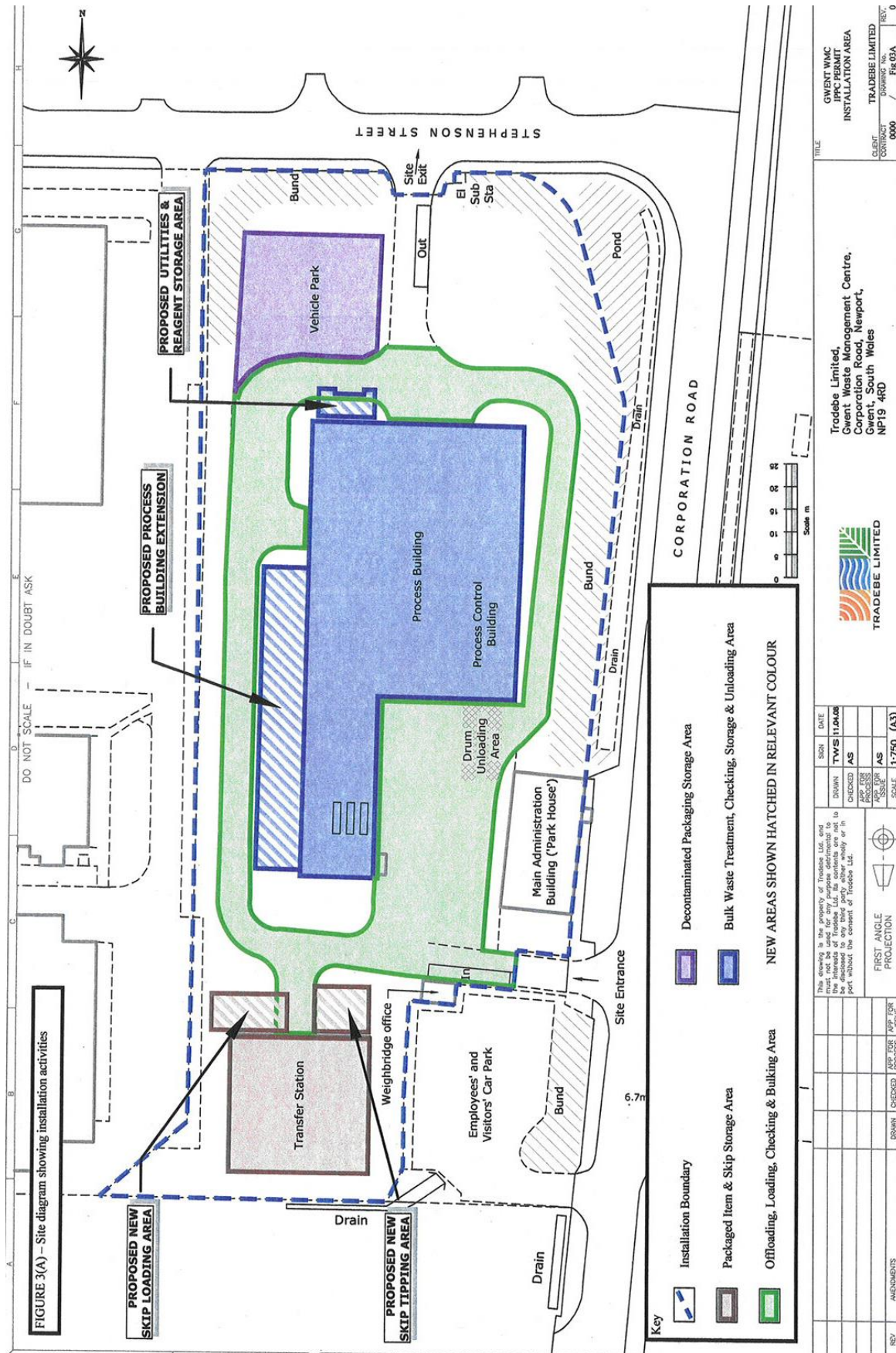
		variation application
		Wastes specified in schedule 3, table S3.3
S5.3 A(1)(b)	R3, Recycling/reclamation of organic substances which are not used as solvents – separation and recovery of oil. R13, Storage pending recovery – storage of oils for onward recovery. D9, Physico-chemical treatment – treatment of oils.	Treatment Plant (986 tonnes) consisting of the following tanks: Tank 21 (468 tonnes) Tank 22 (468 tonnes) Tank 26 (50 tonnes) In the location specified in site drawing, Figure 6(A) Drawing showing storage and treatment tank layout, in Appendix 1 of the variation application.
		Wastes specified in schedule 3, table S3.4
S5.3 A(1)(c)(ii)	D9, Physico-chemical treatment – neutralisation, precipitation, flocculation, saponification, filtration, oxidation, reduction and stabilisation. D13, Mixing or blending – mixing or blending compatible wastes prior to physico-chemical treatment. D15, Storage pending disposal – storage prior to mixing or blending and/or physico-chemical treatment.	Treatment Plant (5254m³) consisting of the following tanks: Tanks 1 to 19 (3533m³) Tank 20 (280m³) Tank 21 (435m³) Tank 22 (435m³) Tank 26 (56m³) Sump 27 / 28 (65m³) Tanks 33 a/b (20m³) Tanks 51 to 55 (153m³) Tank 56 (30m³) Tank 57 (30m³) Tank 58 (5m³) Tanks 60 to 63 (76m³) Tank 64 & 65 (40m³) Also some small storage vessels, filter presses and sumps (96m³) In the location specified in the site drawing, Figure 6(A) Drawing showing storage and treatment tank layout, in Appendix 1 of the variation application
		Wastes specified in schedule 3, table S3.3
Directly Associated Activity		
Cleaning of road tanker vessels & subsequent treatment of aqueous liquids generated from on-site washing through the treatment plant.	Process Building (total 20 tonnes) In the location specified in site diagram, Figure 3(A) Site diagram showing installation activities, in Appendix 1 of the variation application.	Only tankers that have contained the wastes specified in schedule 3, tables S3.3, S3.4 and S3.5.
Storage of hazardous and non-hazardous wastes pending treatment, classification and segregation into waste types during storage.	D15 Storage pending disposal	Transfer facility (500 tonnes) Waste specified in schedule 3, table S3.5
Container washing, shredding and crushing and compaction of nominally empty drums and containers	R3, Recycling/reclamation of organic substances which are not used as solvents – recovery of plastic and plastic packaging. R4, Recycling/reclamation of metals and metal compounds – recovery of metal and metal packaging.	Transfer Facility (50 tonnes) In the location specified in site drawing, Figure 3(C) Detail of transfer station, in Appendix 1 of the variation application. Specified waste 15 01 10* packaging containing residues of or contaminated by dangerous substances.
Lime silo	Storage of lime	Storage of lime for use in the treatment process
Biological treatment	Biological treatment of non-hazardous waste and process effluent.	Biological treatment of <50 tonnes/day of non-hazardous waste and process effluent.

Table S1.2 Operating techniques		
Description	Parts	Date Received
Application	The response to questions B2.1.1 to B2.1.23 and B2.2.1 to B2.2.41 given in pages 11 to 37 of the application. Excluding reference to appendix 6 in section B2.1.1, section B2.1.15, B2.1.18, B2.1.24, B2.2.8, B2.2.17 to B2.2.20, B2.2.25 to B2.2.32, and B2.2.35 to B2.2.40 given in pages 18 to 36 of the application.	24/08/05
Request for further information	Appendix 18 of the application, Installation details, section C2.4.4, Control of point source emissions to air.	12/05/06
Application	The response to questions C2.1 to C2.12 given in sections 7 to 17 of the variation application.	27/06/08

Table S1.3 Improvement programme requirements

Reference	Requirement	Date
IC1	The Operator shall produce and implement an infrastructure maintenance and improvement plan. The written procedures (and any amendments to them) shall accord with section 2.3 (Management) of Sector Guidance Note S5.06, December 2004 and shall be submitted to the Agency for approval.	Complete
IC2	The Operator shall develop and implement procedures and checks to ensure bulk storage structures and associated pipework and fittings are constructed, adequately labelled, inspected and maintained and 'fit for purpose' in accordance with section 2.1.3 (Waste Storage) IPPC Sector Guidance Note S5.06, December 2004. The Operator shall also review any redundant pipework and where appropriate, arrange for decontamination, capping and/or removal of pipework.	01/06/09
IC3	The Operator shall assess the risk of flooding to operational areas of the site and provide and implement a flood risk action plan with procedures to mitigate the impacts of polluting substances entering controlled waters. The flood risk action plan shall be submitted to the Environment Agency in writing for approval.	Complete
IC4	The Operator shall undertake an assessment of the procedures for process control and monitoring of physico-chemical treatment processes carried out within the main process building. The assessment shall take into account the requirements of section 2.1.4 (Treatment – general principles) of the Agency Guidance Note IPPC S5.06, December 2004. A written report summarising the findings, and a timescale for the implementation of any improvements, shall be submitted to the Agency in writing for approval.	Complete
IC5	The Operator shall investigate the need to carry out works to prevent sewer water from re-entering the effluent discharge pipe within the installation boundary. Written proposals for the works to be carried out, their operational details and a timetable for their implementation shall be submitted to the Agency in writing for approval prior to their construction.	Complete
IC6	The Operator shall assess the emissions from the scrubbing system at emission point A1, under a range of operating situations, and shall submit proposals to the Agency in writing for such monitoring as appears to be necessary.	Ongoing (see IC11)
IC7	The Operator shall provide covering for all open topped storage and treatment vessels within the process building in accordance with Section 2.1.3 (Waste Storage) of the Agency Guidance Note IPPC S5.06, December 2004.	31/12/2008
IC8	The Operator shall install level meters with both audible and visual high-level alarms for all storage and treatment vessels within the process building in accordance with Section 2.1.3 (Waste Storage) of the Agency Guidance Note IPPC S5.06, December 2004	Complete
IC9	The Operator shall install Local Exhaust Ventilation (LEV) in a designated location within the transfer facility where containerised wastes are to be repackaged, decanted or bulked up in accordance with Section 2.1.3 (Waste Storage) of the Agency Guidance Note IPPC S5.06, December 2004. The Operator shall provide a plan to the Agency showing the location of the emission point from the LEV extraction system and shall submit proposals for emissions abatement for approval by the Agency.	Complete
IC10	The Operator shall assess the current method for effluent flow with the requirements given in the MCERTS standard 'Minimum requirements for the self-monitoring of effluent flow' version 2, Aug 2004. A written report shall be provided to the Agency detailing how this standard is to be achieved and shall include timescales for implementation.	31/12/2008
IC11	The Operator shall review the current method of measuring scrubber performance and submit a written report to the Agency, to include details of the monitoring method, any relevant procedures and / or standards, the analytical suite tested for and a summary of results from the first 6 months of sampling.	28/11/2008

Schedule 2 - Site plan



Schedule 4 – Emissions and monitoring

Table S4.8 Process monitoring requirements

Emission point reference or source or description of point of measurement	Parameter	Monitoring frequency	Monitoring standard or method ¹	Other specifications
SC1 secondary scrubber on figure 4 (A) air monitoring, air emission and process air points in appendix 1 of the variation application.	pH	Daily	BS 6068-2.50: 1995, ISO 10523: 1994.	pH ≥ 10
SC2 primary alkali scrubber on figure 4 (A) air monitoring, air emission and process air points in appendix 1 of the variation application.	pH	Daily	BS 6068-2.50: 1995, ISO 10523: 1994.	pH ≤ 5
SC3 primary acid scrubber on figure 4 (A) air monitoring, air emission and process air points in appendix 1 of the variation application.	pH	Daily	BS 6068-2.50: 1995, ISO 10523: 1994.	pH ≥ 10
SC5 primary ammonia scrubber on figure 4(A) air monitoring, air emission and process air points in appendix 1 of the variation application.	pH	Weekly	BS 6068-2.50: 1995, ISO 10523: 1994.	pH ≤ 7

Footnote ¹ or to a relevant EN, BS, ISO or SCA blue book method as agreed with the Agency.

Schedule 5 – Reporting

Table S5.1 Reporting of monitoring data

Parameter	Emission or monitoring point/reference	Reporting period	Period begins
Emissions to sewer Parameters as required by condition 3.6.1.	S1	Every 3 months	01/07/06
Emissions to A1* Parameters as required by condition 3.6.1	SC1, SC2, SC3 & SC5	Every 6 months	01/01/09

* To be confirmed in writing with the Agency, on completion of IC11

Table S5.4 Reporting forms

Media/parameter	Reporting format	Date of form
Sewer	Form sewer 1 or other form as agreed in writing by the Agency	01/06/06
Scrubber liquor	Form SC1 or other form as agreed in writing by the Agency	01/01/09
Water usage	Form water usage1 or other form as agreed in writing by the Agency	01/06/06
Energy usage	Form energy 1 or other form as agreed in writing by the Agency	01/06/06
Waste	Waste returns reporting form WMS1 & WMS3	01/06/06
Other performance indicators	Form performance 1 or other form as agreed in writing by the Agency	01/06/06

Schedule 3 – conditions to be added

The following conditions are added to the permit:

- 1.1.4 The operator shall comply with the requirements of an approved competence scheme or shall hold an appropriate certificate of technical competence or other approval issued by the Agency.

Schedule 1 – Operations

Table S1.6 Pre-operational measures

Reference	Pre-operational measures
1	The operation of the biological treatment activity shall not be permitted unless in accordance with a method statement agreed in writing with the Agency. The method statement shall include (as appropriate) details of the proposed waste types, equipment, method of operation, monitoring and recording of treatment, waste disposal and the precautions taken to prevent pollution of the environment, harm to human health and serious detriment to the amenity of the locality.
2	The Operator shall provide 28 days written notice to the Agency of plans to commission any new operations relating to variation application no. EA/EPR/SP3531SK/V002.
3	At the commissioning phase of any new operations, monitoring of the relevant internal emission point will take place. The findings and a proposed monitoring regime must be agreed in writing with the Agency prior to commencement of the new operation.