A & M Smith Recycling Services Ltd

PPC-A-1008883

Variation - VAR1

CONTENTS

APPLICANT AND SITE NAME ..... Error! Bookmark not defined.
CONTENTS 2
1 NON TECHNICAL SUMMARY OF DETERMINATION 3
2 EXTERNAL CONSULTATION AND SEPA'S RESPONSE 3
3 ADMINISTRATIVE DETERMINATIONS 5
4 INTRODUCTION AND BACKGROUND 6
4.1 Historical Background to the activity and variation 6
4.2 Description of activity 6
Outline details of the Variation applied for 6
4.3 Guidance/directions issued to SEPA by the Scottish Ministers under Reg.60 or 61. 7
4.4 Identification of important and sensitive receptors 7
5 KEY ENVIRONMENTAL ISSUES 7
5.1 Summary of significant environmental impacts 7
5.2 Implications of the Variation on - Point Sources to Air 7
5.3 Implications of the Variation on - Point Source Emissions to Surface Water and Sewer 7
5.4 Implications of the Variation on - Point Source Emissions to Groundwater 8
5.5 Implications of the Variation on - Fugitive Emissions to Air 8
5.6 Implications of the Variation on - Fugitive Emissions to Water 8
5.7 Implications of the Variation on - Odour 8
5.8 Implications of the Variation on - Management 9
5.9 Implications of the Variation on - Raw Materials 9
5.10 Implications of the Variation on - Raw Materials Selection 9
5.11 Implications of the Variation on - Waste Minimisation Requirements 9
5.12 Implications of the Variation on - Water Use 10
5.13 Implications of the Variation on - Waste Handling 10
5.14 Implications of the Variation on - Waste Recovery or Disposal 11
5.15 Implications of the Variation on - Energy 11
5.16 Implications of the Variation for - Accidents and their Consequences 11
5.17 Implications of the Variation for - Noise ..... ERROR! BOOKMARK NOT DEFINED.
5.18 Implications of the Variation for - Monitoring ..... ERROR! BOOKMARK NOT DEFINED.
5.19 Implications of the Variation for - Closure ..... ERROR! BOOKMARK NOT DEFINED.
5.20 Implications of the Variation for - Site Condition Report (and where relevant the baseline report) ERROR! BOOKMARK NOT DEFINED.
5.21 Implications of the Variation for - Consideration of BAT ..... ERROR! BOOKMARK NOT DEFINED.
6 OTHER LEGISLATION CONSIDERED 13
7 ENVIRONMENTAL IMPACT ASSESSMENT AND COMAH 13
8 DETAILS OF PERMIT 13
9 EMISSION LIMIT VALUES OR EQUIVALENT TECHNICAL PARAMETERS/ MEASURES 15
11 FINAL DETERMINATION 16

1 NON TECHNICAL SUMMARY OF DETERMINATION

A and M Smith recycling services Ltd are a waste company in the north-east of Scotland. The site originally had an inert landfill Waste Management Licence.

This was subsequently changed into a PPC part a permit for landfilling section 5.2 schedule 1 of the Pollution Prevention and Control regulations 2012. They also have an inert material recycling facility on this site. This landfill site has now closed.

The company intend to import waste from the oil and gas industry to decant repackage bulk and store waste until there is sufficient levels to transport off-site to an appropriately licensed facility for treatment or disposal.

This will be under section 5.3 (b) disposal or recovery of hazardous waste with a capacity exceeding 10 tonnes per day involving (iii) blending or mixing wastes and (iv) re packaging of the waste on site prior to be taken for offsite treatment or disposal at an appropriately licensed facility.

The operation at the Hazardous waste transfer station will also involve storing up to 250 tonnes of hazardous wastes prior to be taken off site for treatment or appropriate disposal. This activity falls under section 5. 6, Part A (a) of the PPC 2012 regulations.

All associated activities for this hazardous waste transfer station will be carried out within the hazardous waste transfer station and not in any other part of the site.

Glossary of terms

BAT	-	Best Available Techniques
CO	-	Coordinating Officer
ELV	-	Emission Limit Value

2 EXTERNAL CONSULTATION AND SEPA'S RESPONSE

***Is PPC Statutory Consultation* Required – Yes**

Food Standards Agency:
Sent: 05/11/2021
Rec'd: 17/01/2021 – no concerns.

Health Board:
Sent: 05/11/2021
Rec'd: No response.

Aberdeenshire Council:
Sent: 05/11/2021
Rec'd: 09/11/2021 and 22/02/2021

Received information from Aberdeenshire Council planning department on 09 November 2021 stating that the proposal would require a new planning application as it would require to be screened under the environmental impact regulations 2017.

Aberdeenshire Council subsequently clarified, in letter to SEPA in February 2022, that given the treatment carried out at the hazardous waste transfer station was repackaging and bulking of hazardous waste materials, rather than carrying out a physico-chemical treatment of the waste materials on the site, a new planning application was not required.
Scottish Water: N/A
Health and Safety Executive: Sent: 05/11/2021 Rec'd: No response.
Scottish Natural Heritage (PPC Regs consultation): No, not within the screening boundary required for PPC 5.3 2km
Discretionary Consultation – N/A
Enhanced SEPA public consultation – N/A
Public Participation Consultation -
STATEMENT ON THE PUBLIC PARTICIPATION PROCESS **The Pollution Prevention and Control (Public participation)(Scotland) Regulations 2005 requires that SEPA's draft determination of this application be placed on SEPA's website and public register and be subject to 28 days' public consultation. The dates between which this consultation took place, the number of representations received and SEPA's response to these are outlined below.**

Date SEPA notified applicant of draft determination	22/03/2022
Date draft determination placed on SEPA's Website	25/03/2022
Details of any other 'appropriate means' used to advertise the draft	
Date public consultation on draft permit opened	25/03/2022
Date public consultation on draft permit consultation closed	
Number of representations received to the consultation	
Date final determination placed on the SEPA's Website	

Summary of responses and how they were taken into account during the determination:
Summary of responses withheld from the public register on request and how they were taken into account during the determination:

3 ADMINISTRATIVE DETERMINATIONS

Determination of the Schedule 1 activity

The Operator applied to undertake two new Schedule 1 activities:

- The bulking and repackaging only, of hazardous waste at an installation with a capacity greater than 10 tonnes per day as defined in section 5.3.; and
- The temporary storage in an installation with a capacity of more than 50 tonnes of hazardous waste pending any of the activities described in any of Sections 5. 1 to 5. 3 of the Regulations falling within Schedule 1, Part 1, Chapter 5, Section 5. 6, Part A (a) of the Regulations.

Determination of the stationary technical unit to be permitted:

The stationary technical unit associated with the two new activities is a new standalone building to the west of the site referred to as the Hazardous Waste Transfer Station.

The building is served by a sealed drainage system which drains into a 10,000l underground holding tank to the south of the building.

The STU will share the office buildings and weighbridge in common with other waste activities currently undertaken on site.

Determination of directly associated activities:

The additional directly associated activities introduced as part of the substantial variation are:

- The collection of runoff from the Hazardous Waste Transfer Station via a sealed drainage system to the underground sump;
- The washing of containers which contained waste (some may have contained haz waste);
- The acceptance of non-haz waste into the Hazardous Waste Transfer Station (this is not covered by the sched 1 activity).

Determination of 'site boundary'

There is no requirement to change the site boundary for this particular application.

4 INTRODUCTION AND BACKGROUND

4.1 Historical Background to the activity and variation

Currently this permit authorises the operation of an inert landfill site and the treatment and storage of non-hazardous and inert wastes at a waste transfer facility within the site.

In order to diversify the company wish to modify the permit to authorise the receipt, storage and transfer of hazardous wastes at the permitted installation.

4.2 Description of activity

Pre acceptance checks will be carried out prior to accepting hazardous wastes at the site this will be entered onto the it system at the site.

When the hazardous wastes arrive at the site at a specific time waste consignment notes will be cross referenced to ensure that there are no discrepancies in the consignment note and the information within the it system.

An initial inspection of the wastes will be carried out to check the integrity of the containers.

Wastes will then be transported to the Hazardous waste Transfer station where a more detailed inspection of the wastes will be carried out to ensure that the waste can be identified.

Waste will then be given a unique reference number which will be placed in the IT system.

When the relevant information is added to the system the wastes will be taken to a bay. With other compatible wastes which have the same chemical composition and which will not cause an adverse reaction when combined.

Wastes will be decanted, bulked and repackaged for onward processing and recycling.

All waste activities will be carried out within the Hazardous waste transfer building.

Outline details of the Variation applied for

Application for hazardous waste transfer station

Within this application the company's main aspect of this variation is to request a variation in order to permit the receipt, storage, and transfer of hazardous wastes at the permitted installation.

This modification would not change the total tonnage of waste across the site however, the overall composition of the waste will change. The applicant has proposed to reduce the tonnage of non-hazardous waste moving through the transfer station 49,999 tons per annum to 47,499 per annum tons. The variation application requests that 2500 tons per annum of hazardous waste the added

to the volume of material within the transfer station. The volume of inert materials entering the site shall remain at 25,000 tonnes per annum.

With this variation the application requests that the site can accept hazardous waste delivered by A and M Smith recycling services vehicles as well as third-party registered waste carriers.

4.3 Guidance/directions issued to SEPA by the Scottish Ministers under Reg.60 or 61.

No guidance or instructions issued by the Scottish Ministers.

4.4 Identification of important and sensitive receptors

Residential Properties

There are residential properties within 5 km of the site. However, the proposed modifications within the variation of this permit are unlikely to cause adverse effect on the local residential properties. This is due to location of the building and that the area underneath has been redeveloped which should negate any issues with groundwater and potential gas. This is due to the location of the building and the area underneath the building being remediated with all waste material being processed to ensure that any potential gas build-up is eliminated.

Designated Areas
Variation for a PPC 5.3 which has a screening distance for designated areas of 2 km. When carrying a GIS check, there were no specially designated areas within the vicinity.

Water Courses
there is a field drain around the back of the site and to outside, however this does not appear in the 1:15 scale map therefore is not considered as a watercourse.

5 KEY ENVIRONMENTAL ISSUES

5.1 Summary of significant environmental impacts

Summary of significant Environment
The most significant environmental impact will potentially result from:

- Loss of containment of waste materials either through spillage or poor containment.
- Inappropriate mixing of waste materials causing gas or explosive risk.

Mitigation measures will be put in place to address these please see below for further details.

5.2 Implications of the Variation on - Point Sources to Air

There will be implications to air form the site from the site plan there are air vents across the site for ventilation. Segregation and pre acceptance checks should ensure that the productions of VOC's are limited during the decanting, bulking, and repackaging of wastes.

5.3 Implications of the Variation on - Point Source Emissions to Surface Water and Sewer

The building in which the materials will be stored for this variation is constructed of concrete which lays falls to a sealed drainage system and sealed underground storage tank. This will negate point source emissions to water. Operator has stipulated that no material is stored out with the building which could pose a risk to materials leaking onto impermeable surfaces or creating pathways to the field drain out with the site boundary.

5.4 Implications of the Variation on - Point Source Emissions to Groundwater

As there is a wide range of wastes that may be present at the site and that there is limited information about the construction materials used for the primary, secondary and tertiary containment with the underground pipework and sealed underground storage tank, it is recommended that a relatively frequent ground water monitoring is likely to highlight any concerns which can then be managed within the permit conditions.

5.5 Implications of the Variation on - Fugitive Emissions to Air

There will be no mixing or treating of wastes on site other than the simple bulking of the same waste types together.
All wastes are to be received and stored in sealed containers and good acceptance procedures and processes will provide assurance that that is the case. This will reduce the risk of any fugitive emissions to atmosphere associated with the process.
There are no Lev's for this building.

5.6 Implications of the Variation on - Fugitive Emissions to Water

The main risk that this activity would pose to fugitive emissions to water would be loss of containment from hazardous waste activities. The company has proposed two methods to reduce the risk posed by such loss of containment. The first is to reduce the likelihood of event occurring in the first instance, the company propose to ensure that all waste activities occur within the hazardous waste transfer station building which has a concrete surface and a sealed drainage system connected to a 10,000 L underground storage tank. The company will also ensure that materials are removed from the site promptly reducing the potential for containment loss.

The second method that the company has proposed is to adopt a pollution control hierarchy system which will reduce the significance of the impact if loss of containment were to occur. This will follow a four-step approach which is as follows.

- Contain the pollution at the source
- contain the pollution close to source
- contain the pollution on the surface
- contain the pollution and the drainage system and storage tank.

.

5.7 Implications of the Variation on – Odour

All wastes will be received onto site in sealed containers.
All waste activities will be contained within the building which will ensure that doors are closed during operational times.

The site is remote with few houses within the vicinity of this site.

There have been no complaints received at this site pertaining to odour emissions adversely affecting the local sensitive receptors.

If waste is found to be odorous then steps will be taken to ensure that the handling of the waste is kept to a minimum and contained within the containers to ensure that odour is minimized

5.8 Implications of the Variation on – Management

As this is a new process for this site, there will be implications for the management of this site.

It will require:

- An updated Environmental Management System to take into account the new procedures and processes to ensure the operation ins operated in accordance with BAT. The Operator has provided us with updated procedures as part of the application.
- Technically competent members of staff familiar with operating a hazardous waste transfer station. The company has addressed this by employing WAMITAB level 4 certificate staff, that are qualified and capable of ensuring the installation can operate in compliance with the permit conditions.

5.9 Implications of the Variation on - Raw Materials

This variation will increase the level of consumables in the form of replacement parts for equipment PPE, spill kit materials, waste containment (drums, IBCs plastic bags and shrink wrap) and appropriate hazardous waste labels. Where appropriate operator will reuse and recycle consumables to minimise the impact of raw materials used at the site.

High-pressure washing will be used to reduce the volume of water required to clean IBC containers of residual fluid.

There will be welfare facilities situated beside the hazardous waste transfer station with a toilet, sink and a kitchen area. There will be a chemist lavatory the washing sink and there will be an emergency shower within the hazardous waste transfer station shed. All of which will require additional water supplies to run effectively this will increase the volume of water used at the site.

5.10 Implications of the Variation on - Raw Materials Selection

There will be little implications of this variation on Raw materials selection at this installation however, to minimise the impact that there are materials for use where possible the company will utilise biodegradable sources to minimise the impact that this variation will have on the environment in terms of synthetic products.

5.11 Implications of the Variation on - Waste Minimisation Requirements

Due to the nature of the operation it is likely that very little waste will be produced in terms of consumables and waste materials produced during the process. However, waste may be produced from the containment methods i.e. IBCs, drums and other containers the waste hierarchy will be adopted to reduce the amount of packaging sent for disposal.

5.12 Implications of the Variation on - Water Use

There is potential requirement for high pressure water jetting to be used during any deep cleaning that might be required within the hazardous waste transfer station. To minimise water consumption when jetting is required, the operator will use high pressure jetting. This is separate to other activities occurring at the site including the wheel washing bays.

The hazardous waste transfer shed will also have a toilet and sink with handwashing facility as well as a kitchen area which will use a small amount of water which will use a small volume of water. Additional to other facilities at the site.

The chemist's laboratory will have a wash sink which will drain to the main underground storage tank which will require regular emptying to prevent build up within the site.

5.13 Implications of the Variation on - Waste Handling

This variation will have implications in terms of handling of wastes on site at the Hazardous waste transfer facility. Operator has provided information as to how wastes will be assessed through out the time that the wastes will be handled at the site.

This will include pre acceptance procedures to identify the waste being imported to the site to ensure that all relevant information is provided including the waste types, all hazards associated with the waste, the quantities and the EWC types, a visual inspection will be carried out where possible to show if any loss of containment or any in appropriate containment of wastes coming on to site.

When wastes enter the hazardous waste transfer station a further visual inspection will be taken to ensure that the integrity of the waste containers. This also to make sure that the site does not exceed the volume of waste permitted at the site.

Appropriate codes will be provided to ensure that the wastes can be traced through out the process.

Steps will be taken to ensure that wastes will be segregated and stored in appropriate bays according to hazardous class and container type.

If wastes are identified as being in combatable or if there are any issues with the containment, the wastes will be taken to a quarantined area where they will be repackaged if in the event of poorly contained waste and removed off site as soon as possible.

A maximum storage of 250 tonnes of waste will be stored on site at any one time. All wastes will be stored for a maximum period of 6 months.

All relevant records of the wastes will be uploaded onto the company's tracking system. These identification types are documented in C4 of the documents provided by the operator.

5.14 Implications of the Variation on - Waste Recovery or Disposal

The variation to this permit is to allow Hazardous wastes to be decanted, bulked and repackaged for onward recycling or where this is not possible disposal. To ensure that disposal is minimized operator is required to ensure that wastes are adequately characterized to ensure that appropriate wastes are bulked together to prevent inadequate mixing which could impede their treatment when moved to a suitable licensed facility.

Conditions in section 12.10 of the permit have been added to ensure that incompatible oils are not mixed and any mixing of oils when they are decanted and repackaged, they do not impede their treatment when moved to a suitable licenced facility.

5.15 Implications of the Variation on – Energy

There will likely be a minimum impact on energy usage as a result of this variation is the activity is not energy intensive. There will be a requirement for energy usage in the portacabin office and the chemical laboratory. All lights within the hazardous waste transfer station and the external yard will be LED (low-energy rated).

The planned to be used for movement of the hazardous waste materials will be telescopic handler which will be rated to a level suitable for the job and not higher therefore the energy usage will be low. There is no gas supply required for this activity.

5.16 Implications of the Variation for - Accidents and their Consequences

In the event there was a loss of containment of hazardous waste, the operator would carry out a four stage approach to ensure that all hazardous wastes or prevented from causing harm to the environment. Please see information provided in section 5.6. Records of wastes will be kept available on site to ensure that in the event of an emergency, wastes can be clearly identified in the event of an emergency to ensure that incompatible wastes are not mixed.

Condition 12.2.1 of the permit variation requires the operator to prepare, implement and maintain an incident prevention and mitigation plan to identify all hazards posed by the activities at the Hazardous Waste Transfer station and define steps taken to ensure that all preventative measures are in place to avoid any incident to any medium.

5.17 Implications of the Variation for – Noise

The storage and handling operations to be carried out in the Hazardous waste transfer station are the same as on the existing site area, so noise emissions are not expected to increase. Operations will continue under the permit requirements and the operator's Noise Management Plan.

5.18 Implications of the Variation for – Monitoring

The site will carry out regular monitoring of RHS at this site specifically for the hazardous waste transfer station to ensure that any emissions to ground water are checked so that if any remedial action is required, it can be addressed and actions taken.

5.19 Implications of the Variation for – Closure

As there is an addition of a hazardous waste transfer station at this site there will be a change to the closure report. A baseline survey has been provided which has been checked and assessed by contaminated land and requirements for monitoring including substances and frequency for ground water and soils have been set within table 12.12.1 and table 12.12.2 of the new schedule specific to the hazardous waste transfer station which should provide data to support any future surrender of the permit.

5.20 Implications of the Variation for - Site Condition Report (and where relevant the baseline report)

Baseline

As a par of this variation, a baseline survey has been carried out specifically for the Hazardous waste transfer shed. As the operator is intending to import a wide range of hazardous wastes being imported onto the site the list of Relevant Hazardous Substances.

Contaminated land assessed the list of relevant substances and a site investigation carried out at the site which has provided sufficient information to provide information regarding the baseline data for the relevant hazardous substances for the site.

The boreholes installed at the site at the time of the site investigation are still in-situ and will be retained.

It was recommended that groundwater was measures frequently with a wide range of contaminants. Given that there is little information provided detailing the construction and materials used for primary, secondary and tertiary containment, in combination with underground pipework and effluent holding tank it was recommended that ground water monitoring is carried out frequently this is to ensure that any concerns are found and can be addressed. The soil sampling was set at a longer frequency as it is likely that ground water monitoring will provide sufficient information to highlight any concerns relating to potential contaminant pathways.

5.21 Implications of the Variation for - Consideration of BAT

This Variation will have implications for BAT consideration, the operator has stated that they will implement a system of pre site checks to ensure that the Hazardous waste characteristics are identified prior to the waste from entering the site. Cross-referencing this information when samples enter the site so that there is not discrepancies and holding the information on an IT system. Wastes will be segregated so that wastes which could have an adverse reaction if mixed, are fully separated. Other BAT considerations have been added to conditions of the permit to ensure that all BAT considerations have been addressed.

6 OTHER LEGISLATION CONSIDERED
Nature Conservation (Scotland) Act 2004 & Conservation (Natural Habitats &c.) Regulations 1994
Is there any possibility that the proposal will have any impact on site designated under the above legislation? No. **Justification:** No designated sites were located within the screening distance.
Screening distance(s) used – 2km

7 ENVIRONMENTAL IMPACT ASSESSMENT AND COMAH
How has any relevant information obtained or conclusion arrived at pursuant to Articles 5, 6 and 7 of Council Directive 85/337/EEC on the assessment of the effects certain public and private projects on the environment been taken into account? Not applicable.
How has any information contained within a safety report within the meaning of Regulation 7 (safety report) of the Control of Major Accident Hazards Regulations 1999 been taken into account? The site is not regarded as a COMAH site.

8 DETAILS OF PERMIT	
Do you propose placing any non standard conditions in the Permit	
Do you propose making changes to existing text, tables or diagrams within the permit?	
Waste Treatment BATc	This term is refereed to in several new conditions so needed to be included in the interpretation of terms.
Schedule 1 deleted and replaced with new Schedules 1	The new schedule 1 adds in the new activities which the operator applied for. It defines the stationary technical unit associated with the new activities (the Hazardous Waste transfer Station) and includes relevant directly associated activities.

	The new activity relates to the bulking and repackaging of haz waste only. It specifically does not include the physico-chemical treatment of waste. The planning permission only covers the bulking and repackaging of hazardous waste. The treatment of non-hazardous waste at the Hazardous Waste transfer Station has been included as a DAA as the 5.3 activity and 5.6 activity would not cover this.
New Appendix 1 Site Plan	This has been included to update the original Site Plan and include the new Hazardous Waste Transfer Station.
Condition 4.3.1 replaced.	This condition was amended to make it clear which areas of the installation could accept liquid wastes and hazardous wastes.
12.1 General	This section has been included to clearly define the scope of the scope of this schedule.
12.2 IP&MP	This is included as standard for most PPC activities. It is particularly important for a site managing hazardous waste where the consequences of an incident could have a much higher impact.
12.3 Waste Types & Quantities	Individual waste types have not been specified. Instead reference has been made to the general waste types referred to by the Operator in their Financial Provision assessment. The suitability of the waste entering site shall be adequately controlled by Pre-acceptance, and Waste Acceptance procedures and processes. The total tonnage of 250 tonnes is again based on the Operators Financial Provision assessment.
12.4 Pre Acceptance	This is a critical requirement for a site of this nature. Rather than specify specific conditions a general requirement has been placed on the Operator to devise their own systems and processes in accordance with the requirements stated in the Waste treatment BATc. Further detail can be found in the Waste treatment BREF and the Sector Guidance Note S5.06 which provides comprehensive details regarding what a fully compliant pre-acceptance system should include.
12.5 Acceptance	Same logic has been applied as stated above in relation to 12.4.
12.6 Waste tracking	Same logic has been applied as stated above in relation to 12.4.
12.7 Storage and Segregation	Onus is on the Operator to ensure the building is appropriately designed and maintained for the waste types which they wish to accept. Storage of waste within the building has been kept to 6 months, as stated by the Operator in their application. The storage of haz waste in sealed containers is considered BAT to prevent any diffuse odour emissions and to reduce the risk of spillages. We have required the clearing of the storage area to ensure throughput of the waste.

	Clear labelling is considered BAT. Clarity regarding maximum storage quantities in a way that is meaningful is important. It is also critical that the hazards associated with the wastes being stored are visible to all from out with the area. The requirement for separation/segregation is critical to preventing incidents from occurring. A quarantine area is required so that wastes which have not been adequately labelled, can safely be stored pending verification.
12.8 Bulking and Repackaging	Same logic has been applied as stated above in relation to 12.4.
12.9 Container Washing	The activity must be undertaken in a bunded area to ensure protection of soil and groundwater and to prevent fugitive releases to the water environment.
12.10 Waste Oils	These conditions have been included to satisfy regulation 31 of the PPC Regulations (Scotland) 2012 (As amended).
12.11 Asbestos	These conditions have been included to ensure the management of asbestos waste is conducted in a manner to ensure the highest level of environmental protection.
12.12 Protection of Soil & Groundwater	12.12.1 – standard. 12.12.2 – specifically included to ensure all drainage from the Hazardous Waste Transfer Station building (excluding the adjacent Blacksmith workshop) is directed to the dedicated sealed drainage system and to prevent any ambiguity regarding drainage to surface water systems. 12.12.3 – included to ensure current up to date plans are maintained. 12.12.4 – included to ensure systematic assessment of drainage and sub-surface infrastructure is undertaken. This is deemed necessary to ensure soil and groundwaters are protected. 12.12.5 – this is an annual assessment of the surfaces again to ensure protection of soil and groundwaters. 12.12.7 to 12.12.14 – all standard conditions. The entire permitted activity takes place within a building which has a floor of 200mm reinforced concrete. Given the this, the requirement for soil monitoring is obsolete, and greater emphasis is placed on annual inspections of the working surface, 4 yearly drainage assessments, and 2 yearly groundwater monitoring frequency.
12.13 Water Environment	Ensure that no liquids arising from the permitted activities are discharged to the water environment.

9 EMISSION LIMIT VALUES OR EQUIVALENT TECHNICAL PARAMETERS/ MEASURES

Are you are dealing with either a permit application, or a permit variation which would involve a review of existing ELVs or equivalent technical parameters?

There are no known emission points to air or water associated with the variation application.

10 FINAL DETERMINATION

Issue of a Permit - Based on the information available at the time

Issue a Permit – Based on the information available at the time of the determination SEPA is satisfied that

- The applicant will be the person who will have control over the operation of the installation/mobile plant,
- The applicant will ensure that the installation/mobile plant is operated so as to comply with the conditions of the Permit,
- The applicant is a fit and proper person (specified waste management activities only),
- Planning permission for the activity is in force (specified waste management activities only),
- That the operator is in a position to use all appropriate preventative measures against pollution, in particular through the application of best available techniques.
- That no significant pollution should be caused.

11 REFERENCES AND GUIDANCE

1. Waste Treatment BREF
2. BAT-C (08/2018)
3. Sector Guidance Note S5.06: Guidance for the Recovery and Disposal of Hazardous and Non Hazardous Waste, v5, 2013.
4. WM3