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Application for a Permit or Variation to a PPC Part A Permit Decision Document	Date of Issue	10/03/2025
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**Enva Organics Recycling Limited
Newhousemill Road, Blantyre, G74 2LE**

Permit Variation

PPC/A/1038376

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How to use this form

Purpose of the document - This document is intended to demonstrate transparency of the determination process to all interested parties. It should record all significant issues, decisions made, actions taken, and rationale for the approach adopted. It should be sufficiently detailed to demonstrate that all legal requirements were adhered to and provide the basis for defending any appeal.

Language used – You should use non-technical language as far as practicable, avoiding unexplained acronyms and technical terms. While aiming to be comprehensive, it must also be as brief as possible, consistent with the overriding need for clarity and accuracy. Officers should bear in mind that much of the document may be available publicly under the Freedom of Information Act etc.

Timely recording of information - Completion of the various forms should be done on a progressive basis rather than at the end of the process.

Level of detail - Officers should use their professional judgement as to the level of detail required which will depend on the complexity of the process. Officers must consider why the information is required and ensure appropriate detail is included. Each table is designed to be expanded as text is added and will obviously allow the insertion of additional rows where necessary

Applicability of any Section - Do not delete whole sections of the form unless directed to do so. If something is not applicable to your determination, please record this on the form and give a justification if appropriate indicating you have considered the issue and not just missed it.

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1 Non-Technical Summary of Determination

Provide a non-technical summary of the process and determination

Enva Organics Recycling Limited (the “Operator”) (SC178301) operates a composting site at Blantyre Muir, Newhousemill Road, Blantyre under PPC permit – PPC/A/1038376. The current activities on the site under the PPC Regulations fall under Schedule 1, Section 5.4, Part A (b)(i) and Section 6.8, Part A (b).

The site accepts co-mingled green and food waste treated through an In-Vessel Composting process and also processes green waste to produce high grade compost certified to BS PAS:100. This process is odorous and has had an impact on the local communities. The site is situated with East Kilbride to the West and Hamilton to the East.

An enforcement notice was issued by SEPA on 6th July 2022 stating that sufficient and effective measures must be implemented to ensure that no offensive odours from the composting facility are detected beyond the site boundary after 1st April 2023. From April 2023, co-mingled green and food waste is still accepted for bulking and transport to alternative sites, but it is not treated on-site.

This permit variation application has been made to address the release of potential offensive odours from the sanitisation and stabilisation stages of the In-Vessel Composting Activity process. The current annual tonnage on the site for In-Vessel Composting Activity is 75,000 tonnes, with a monthly tonnage limit of 3,500 tonnes and the maximum tonnage allowed on site for the In-Vessel Composting Activity is 14,000 tonnes. The In-Vessel Composting (IVC) system currently in place has 9 IVC units in a two stage in-vessel barrier system. These have a retractable roof with open drainage system. These units are connected to the odour abatement system that also serves the Reception Building and vents via the bio-filter.

The Maturation Shed currently in the permit is not fully enclosed and is described as “roofed maturation enclosure”. It is not connected to the odour abatement system and the windrows are manually turned during the stabilisation phase.

Under the current permit there is no emission to the water environment or the sewer network from the Permitted Installation.

Within the In-Vessel Composting Activity, the Operator is proposing to delete the monthly limit condition and increase the maximum tonnage on site at any one time to 18,000 tonnes. The monthly limit condition ceased to have effect several years ago (see Condition 5.2.3) and its removal at this point is an administrative change.

Location	Tonnage (max)
Reception Building	500 tonnes
In-Vessel Composting Units	4,000 tonnes (in total)
Fully enclosed Maturation Shed	9,000 tonnes
Finishing Shed	1,500 tonnes
Composting Loading Area	3,000 tonnes
Total	18,000 tonnes

The proposed In-Vessel Composting system will comprise of five fully enclosed IVC Units with fully enclosed leachate drainage system. In addition, the Maturation Shed will be fully enclosed. An Aerated Static Pile (ASP) technology will be used in the Maturation Shed which blows air through the compost tables and drains leachate during the stabilisation phase. It is proposed that the tables of compost in the Maturation Shed will be increased in height from 3m to 4m.

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The Reception Building, IVC Units and the Maturation Shed will all be connected to the odour abatement system that vents via a water scrubber and 2 biofilters.

The Operator is also proposing to re-instate the surface water drainage emission conditions and a new discharge point for emissions to the nearby watercourse, the Rotten Burn. A foul water outlet is also proposed for the sewage treatment plant on site that accepts foul water from the office cabins.

The PPC Part A application process requires statutory consultation to be undertaken with the Public through SEPA's Public Consultation Hub, through advertisement in both a local newspaper, Hamilton Advertiser and the Edinburgh Gazette as well as Public Bodies (see section 2 for details).

Following a review of the In-Vessel Composting Activity information provided for this variation, a Requirement for Information Notice was issued to the Operator:

- **Leachate recirculation system** – Operator to provide information on all leachate sources on site and management thereof.
- **Surface water management** – Operator to provide information on segregation of clean and foul water, including leachate within the site.
- **Foul water management** – Operator to provide further information on the foul water drainage plan for the site.
- **Emissions inventory** – Operator to provide information on all discharges of surface and foul water from the site, with reference to BAT-AELs and emissions inventory.
- **Soil and Groundwater** – Operator to provide further details on substructures on site and secondary containment measures in place.
- **Site plan** – full site plan to be shared
- **Odour Management Plan (OMP)** – Operator to share an updated OMP to reflect new processes onsite.

A review of the water discharge from the site to the Rotten Burn was undertaken with SEPA's Hydrology team where it was found with modelling based on a maximum discharge rate of 30 litres/second with a SUDS basin that the discharge would not achieve compliance with the modelling limits. The Operator asked SEPA for further modelling with a decrease in the flow rate to 10 l/s, this modelling did not show much difference from the higher discharge rate. This is due to the low dilution of the receiving watercourse, Rotten Burn. Under the current proposals, the operator will not be able to meet the BAT-AELs and therefore the proposed emission conditions will not be reinstated to the permit at this time and the leachate will continue to be tankered offsite to a sewer water discharge consent.

Following review of the information provided, a further Requirement for Information Notice was issued to the Operator in regard to Odour management on site.

- **Emissions inventory** – more detailed inventory was requested from the Operator, with details on where odour emissions would be generated within the process.
- **Maturation shed and IVCs** – the Operator was asked to provide further information on the air movement within the new enclosed areas of the site with reference to Air Changes and assessment on preventing fugitive emissions.
- **Composting process control** – Further information on how the process is controlled to avoid hotspots and anaerobic areas within the 4m high compost tables.
- **Reception hall** – the operator was asked to clarify the air handling in this area
- **Compost Screening area** – The operator was asked for BAT justification for screening composting in external area.
- **Abatement system** – Operator asked to provide more information on the scrubber added to site as part of the abatement system. Information to be provided on the biofilter and operational performance.

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- **Odour management system design** – Operator asked to provide key information regarding the full system design.
- **Odour Impact Assessment** – Operator to provide a methodology statement before undertaking detailed odour impact assessment.
- **Accident Prevention and Mitigation** – Operator asked to provide an updated plan to include fire scenarios.

Following a review of the updates received from the Operator, SEPA asked for further clarification on:

- Revised emissions control strategy demonstrating BAT 34 compliance for channelled emissions.
- Demonstration of effective containment and negative pressure within odorous process areas (BAT 14).
- Confirmation of duct extract orientation and effective capture of odorous air at source.
- Justification for use of recycled leachate in the scrubber and its effect on abatement performance.
- Demonstration that BAT 34-compliant emissions would not be likely to exceed the 1.5 ouE/m³ benchmark at receptors.
- Screening of ammonia and H₂S emissions against relevant assessment levels (H1).
- Updated accident prevention plan addressing containment of contaminated firefighting water (BAT 21).
- Confirmation of process controls to ensure screened compost is stabilised prior to handling.

Initial air emissions modelling showed that the odour emissions from the upgraded facilities would exceed the BAT-AELs in BAT 34 (>1000 OU_E/m³). SEPA requires that the Operator demonstrates compliance with these BAT-AELs. Revised modelling from the Operator was shared and demonstrated that emission levels at the site would meet the BAT-AELs.

Due to the level of uncertainty based on the modelling data for emissions to air, SEPA have placed high frequency monitoring conditions into the varied permit for the following year after commissioning of the activity. These monitoring conditions will look at emissions to air, noise and odour. Systematic assessment and review of these must be carried out to ensure compliance with BAT.

The proposals have been assessed against published BAT guidance and other published guidance to ensure the upgrades proposed at the installation are consistent with BAT.

Glossary of Terms

BAT - Best Available Techniques
BAT-AELs – Best Available Techniques Associated Emission Levels
BAT-C – Best Available Technique Conclusions
BREF – Best Available Techniques Reference Document
CO – Coordinating Officer
ELV – Emission Limit Value
EASR - Environmental Authorisation (Scotland) Regulations 2018
IVC – In-Vessel Composting
STU – Stationary Technical Unit

2 External Consultation and SEPA's response

Is Public Consultation Required?
(if no delete rows below)

Yes

Advertisement Check:

Date

Compliance with advertising requirements

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Edinburgh Gazette	25/07/2025	Yes
Hamilton Advertiser	07/08/2025	Yes

Officer Checking advert:

No of responses received	None
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Summary of responses and how they were taken into account during the determination:

N/A

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

N/A

Is PPC Statutory Consultation Required?
(if no delete rows below)

Yes

Food Standards Agency:	N/A
Health Board:	NHS Lanarkshire No response
Local Authority	South Lanarkshire Council 15/07/2025 response – No comment on this application
Scottish Water	N/A
Health and Safety Executive	N/A
NatureScot	Yes Main shed site is 455m North of Blantyre Muir SSSI, with green composting area only 174m North East of SSSI. Dust from site is not likely to reach SSSI. No further concerns about proposed variations as long as SEPA content with discharge from SUDS pond into Rotten Burn, discharge for foul water drainage and variation to condition 7.3.1. Highlight importance that operators apply and monitor pollution prevention controls in relations to construction works associated with variations and general operational works at site. (see Section 6)

Discretionary Consultation required?
(if yes provide justification and details below, otherwise delete row)

No

Enhanced SEPA Consultation required?
(if yes provide justification and details below, otherwise delete row)

No

“Off site” consultation required
(if yes provide justification and details below, otherwise delete row)

No

Transboundary Consultation required?
(if yes provide justification and details below, otherwise delete row)

No

Is Public Participation Consultation Required?
(if yes provide justification and details below, otherwise delete rows below)

Yes

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	02/06/2026
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Date draft determination placed on SEPA's Website	
Details of any other 'appropriate means' used to advertise the draft. Seek advice from the communication department	N/A
Date public consultation on draft permit opened	01/07/2026
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:	
REMOVE THIS BOX FROM ANY VERSION OF THIS DOCUMENT TO BE PLACED ON THE WEBSITE OR PUBLIC REGISTER. RETAIN IN THE VERSION FOR THE WORKING FILE.	
Officer:	CO

3 Administrative determinations
Determination of the Schedule 1 Activity
No change to the schedule 1 activity for this variation
Determination of the Stationary Technical Unit to be permitted
The Stationary Technical Unit will consist of the Reception Building, 5 In-Vessel Composting Units, a Fully enclosed Maturation Shed, a Finishing Shed, 2 leachate tanks, each with a capacity of 30m ³ , the Odour Abatement System, comprising extraction fans, ventilation ducting, water scrubber and two biofilters, serving the Reception Building, the In-Vessel Composting Units, Maturation Shed and Leachate Tanks, Surface water and leachate drainage including 250m ³ underground fresh water storage tank, storage and recirculation systems, Forced aeration systems which force air through each In-Vessel Composting unit and maturation tables.
Determination of Directly Associated Activities
The Directly Associated Activities on the site have been changed to reflect that the odour abatement system and surface water and leachate drainage, storage and recirculation systems have been moved to the Stationary Technical Unit.
Determination of Site Boundary

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No change to site boundary for this variation.

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4 Introduction and Background

4.1 Historical Background to the activity and variation

The composting facility operated at Blantyre Muir, Newhousemill Road, East Kilbride, comprises of green waste composting and In-Vessel Composting that processes food and garden waste collected from householders by local authorities. The feedstock is generally mostly garden waste with a small volume of food. Small volumes of certified compostable packaging are also accepted.

The Operator has held a permit for this site since 2010 and there have since been five variations to the permit.

Odour has been the main issue with the site historically and a significant amount of time and effort has gone into the regulation of this.

An enforcement notice was issued by SEPA on 6th July 2022 stating that sufficient and effective measures must be implemented to ensure that no offensive odours from the composting facility are detected beyond the site boundary after 1st April 2023.

The Operator now wish to vary the permit to address the release of potential offensive odours from the sanitisation and stabilisation stages of their process. Significant upgrades to these areas include the installation of five new In-Vessel Composting units and the implementation of new Aerated Static Pile (ASP) technology for the fully enclosed maturation area. The upgrades also include the expansion of the abatement extraction and biofiltration system to encompass the Reception Building, IVC units, the Maturation Shed to then be vented via water scrubber to two bio-filters.

4.2 Description of activity

The activity is as described in the Pollution, Prevention and Control (Scotland) Regulations 2012:

- The disposing of or recycling animal carcasses and animal waste at an installation with a capacity exceeding 10 tonnes per day as described in Schedule 1, Section 6.8, Part A (b) of the Regulations.
- The recovery or a mix of recovery and disposal of non-hazardous waste at an installation with a capacity exceeding 75 tonnes per day by biological treatment as described in Schedule 1, Section 5. 4, Part A (b) (i) of the Regulations.

From November 2025, water, waste management, and industrial activities are regulated under Environmental Authorisation (Scotland) Regulations 2018. As this application was made prior to this date, it has been determined under the previous regulations.

Under EASR, the activity is:

- Schedule 20, Chapter 6, Activity 33: Disposal or recycling of animal carcasses or animal waste with a treatment capacity exceeding 10 tonnes per day.
- Schedule 20, Chapter 5, Activity 25: Recovery, or a mix of recovery and disposal, of non-hazardous waste with a capacity exceeding 75 tonnes per day involving one or more of the

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following activities, and excluding activities covered by the Urban Waste-water Treatment Directive -
(a) biological treatment.

4.3 Outline details of the Variation applied for

This proposed variation for the site is to:

- Remove monthly tonnage limit of 3,350t
- Change to single stage in vessel barrier system consisting of 5 In-Vessel Composting units
- Odour abatement system will be expanded from Reception Building to include the five IVC Composting Units and fully enclosed Maturation Shed.
- Change from series of windrows 3m height in roofed maturation shed to Aerated Static Pile (ASP) system in fully enclosed Maturation Shed. Tables will be 4m height.
- Increase tonnage in maturation shed from 6,500t to 9,000t
- Increase tonnage at any one time for the In-Vessel Composting Activity from 14,000t to 18,000t.
- Change/add emission points for surface water drainage and foul water outlet from onsite sewage treatment plant

The In-Vessel Composting Activity will be fully enclosed and odour abated from the start of the composting process in the Reception Building through to the Maturation Shed. The product is then moved to the Finishing Shed.

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

None

4.5 Identification of important and sensitive receptors

This site at Newhousemill Road, East Kilbride, G74 2LE, NGR: NS 6721 5321, and is within 2km of 4 NatureScot designated sites as follows:

Designation	Site	Distance from unit	Qualifying feature
SSSI PA-CODE 293	Calder Glen	1,969.95m NW of site	Lower Carboniferous [Dinantian - Namurian (part)]
SSSI PA-CODE 227	Blantyre Muir	649.77m SW of site	Raised Bog
SSSI PA-CODE 1663	Waukenwae Moss	1,742.39m South of site	Active raised bog and degraded raised bog
SAC PA-CODE	Waukenwae Moss	1,742.39m South of site	Active raised bog and degraded raised bog

Refer to Section 5.2 and section 6 for an assessment of the impact of the proposal on the identified designated sites.

There are sensitive receptors, three houses/agricultural buildings, within 1km of the site. In addition, the town of Hamilton is 2 km to the north east of the site and East Kilbride to the west within 1.8 km. The site has a long history of odour issues, leading to highly sensitised receptors in the local communities.

The Rotten Burn is to the South of the site and runs along part of the Blantyre Muir SSSI boundary. It is in the River Clyde catchment. The mean upstream river flow is 105 l/s.

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5 Key Environmental Issues

5.1 Summary of significant environmental impacts

The primary environmental impact from this variation is in regards with odour emissions from the In-Vessel Composting Activity on site. Modelling has been undertaken to provide estimated odour emissions from the In-Vessel Composting Activity which indicates there should be no impact on nearby sensitive receptors, however there is a large degree of uncertainty associated with this.

SEPA has introduced conditions in this proposed variation to the permit which requires the Operator to increase air emissions monitoring to ensure compliance with ELVs.

The proposal to discharge to the water environment has not been accepted based on the nature of the proposed discharge and the existing quality of the receiving environment.

Where relevant, BAT references are included in the sections below.

5.2 Emissions to Air

Point Source emission to air: (BAT 3)

The proposed variation to the permit will result in two new point sources to air, from Biofilter 1&2 and 3&4. The main pollutant which will be emitted is odour (see Odour section below for details)

In addition to requiring routine monitoring of odour emissions, we have also included a monitoring requirement for ammonia, H₂S, TVOCs and VOCs (speciated). The inclusion of speciated VOC monitoring will help develop the site's emissions inventory. (BAT 3). SEPA have included emissions limit values for odour based on the Waste Treatment BAT-C BAT-AELs and the information submitted by the operator.

Fugitive and diffuse emissions to air: (BAT 14)

There are potential for fugitive and diffuse emissions to air from the In-Vessel Composting Activity. However, the Operator has stated that there will be maintenance procedures in place to minimise potential for emissions to air.

Conditions have been added to the permit to ensure that the integrity of the buildings associated with the In-Vessel Composting Activity are tested annually and that they are maintained and operated in a manner to prevent diffuse emissions to air and water environments.

A condition has been added to the permit to ensure that the matured compost material is only moved to the Finishing Shed once the temperature has been shown to have dropped within the mesophilic range.

Odour: (BAT 3, 10, 12, 13, 14 and 33)

The site at Newhousemill Road, Blantyre has had many issues with odour. The composting process is odorous and has resulted in impact to local communities which are now highly sensitised. Currently there is no In-Vessel Composting Activity on site. This variation proposes new processes for their In-Vessel Composting Activity which aims to reduce the potential for odour and is a direct response to the previous enforcement action taken by SEPA.

The new In-Vessel Composting Activity is largely enclosed with the exception of the Finishing Shed. The Reception Hall, IVC Units and Maturation Shed are all fully enclosed with air being extracted to the odour abatement system which includes a water scrubber and two biofilters. These buildings must be

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maintained at a negative pressure with fast action roller shutter doors, that open for access and egress for personnel and vehicles only.

Odour risk assessment was submitted in support of the application and this initially indicated in that the proposal would result in odour emissions that would exceed the BAT-AEL limit of 1000 OU_E/m³. The Operator subsequently submitted a revised assessment using emission data that they felt better reflected likely emissions from the Activity. This data showed that the odour emissions would be within the BAT-AEL range and indicated that it was unlikely that there would be an impact at the sensitive receptors identified.

However, as these are estimated emission concentrations, there is a high degree of uncertainty associated with them. Therefore, whilst accepting the Operator's assertion that the process will meet the 1000 OU_E/m³ BAT-AEL limit, SEPA will require the Operator to undertake extensive odour monitoring during the first year of operation in order to demonstrate that this is the case. Any monitoring failures will be treated as an incident and dealt with accordingly.

Odour monitoring required includes quarterly monitoring of both biofilters and water scrubber for the first year and thereafter six monthly.

The monitoring of the water scrubber is unusual, however, due to the high degree of uncertainty around its efficacy and concern that the use of leachate as the scrubbing liquor will increase the odour load going to the biofilters, SEPA felt it was appropriate that the Operator undertake robust monitoring to provide assurance that the water scrubber is operating as designed, and importantly is not increasing the odour load going to the biofilters.

The use of leachate in the water scrubber will reduce the demand on the water mains supply and in addition, will reduce the volume of leachate having to be tankered offsite and associated environmental impacts. However, the primary concern at that this site is not water resource efficiency but that it operates in such a way that no offensive odours are emitted outwith the Permitted Installation boundary.

Whilst it is acknowledged that the monitoring costs associated with this frequency will be high, SEPA feel this is reasonable and proportionate given the history and uncertainty associated with the information submitted by the Operator as part of the application.

An Odour Management Plan is currently in place and will be updated to reflect the new processes of the In-Vessel Composting Activity. The OMP will be reviewed annually drawing upon analysis of the odour monitoring results and systematic assessment of the odour emissions.

Conditions in the permit have been updated to ensure that all components of the Odour Abatement System are maintained to ensure it is fully operational and effective in meeting monitoring ELVs. If the odour abatement system is not working, then the site will not be able to accept any further waste.

Further conditions have been added to the permit to ensure that systematic assessment and review of odour emissions is undertaken after completion of commissioning, with the revised OMP to be submitted thereafter. If the assessment identifies adverse impact, then the operator must outline what additional measures will be implemented to reduce the impact.

This will be reviewed as part of regulatory effort.

5.3 Emissions to Water

Point Source Emissions to Surface Water and Sewer:

The Operator had applied for a proposal to resume discharge via the SUDS drainage system to the Rotten Burn and add the foul water discharge from the sewage treatment plant on site.

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However, following a review of the water discharge from the site to the Rotten Burn undertaken by SEPA's Hydrology team, it was found with modelling based on a maximum discharge rate of 30 litres/second with a SUDS basin that the discharge would not achieve compliance with the modelling limits. Further modelling with a decrease in the flow rate to 10 l/s, did not show much difference from the higher discharge rate. This is due to the low dilution of the receiving watercourse. Under the current proposals, the operator will not be able to meet the BAT-AELs and therefore the proposed emission conditions will not be reinstated to the permit at this time and the leachate will continue to be tankered offsite to a sewer water discharge consent.

The discharge from the sewage treatment tank is already authorised under CAR/R/1086176.

Point Source Emissions to Groundwater:

There are no authorised point source discharges to groundwater.

Fugitive Emissions to Water:

All buildings which form part of the In-Vessel Composting Activity are fully concreted and served by a sealed drainage system. Some components of this drainage system are subsurface. Conditions are included in the variation which require the Operator to demonstrate both as part of the commissioning and on an ongoing basis, the integrity of the drainage system and all partial or fully submerged tanks, sumps etc.

SEPA accepts the operator's risk assessment in relation to fire however there remains some potential for fugitive emissions to soil and groundwater. SEPA expect this to be addressed in the revised Incident Prevention and Mitigation Plan due in February 2027 following plant commissioning.

Conditions are in the permit that require soil (10 years) and groundwater (4 years) monitoring.

5.4 Noise (BAT 17 & 18)

Currently, there have been no recorded noise complaints at the site. The nearest noise sensitive receptor is 554m from the site. The Permitted Installation is in an agricultural setting with a windfarm nearby. Operational hours are kept to a minimum: 7am – 5pm. All plant and machinery are serviced and maintained in good working order to minimise noise.

The Operator has developed and implemented a Noise and Vibration Management Plan (NMP) for the site, which as part of the existing permit conditions is due to be revised in 2028. A third party sub-contractor is reviewing the plan and will consider all new equipment and plant for the site. All new plant and equipment introduced to the site under this variation has been considered for both efficiency and environmental impact to ensure minimal emissions.

However, the operator's application indicated the proposed variation would not result in a change of their noise emissions, and therefore did not submit a revised noise risk assessment. SEPA note that the variation includes the installation of five new fans associated with the IVC units which will be installed at an elevated level and as a consequence there may be a change in noise emissions. Therefore conditions have been added to the varied permit to ensure that a BS:4142 noise risk assessment is undertaken after completion of commissioning, with the revised NMP to be submitted thereafter. If the assessment identifies adverse impact, then the operator must outline what additional BAT measures will be implemented to reduce the impact. This will be reviewed as part of regulatory effort.

Conditions in the permit are included to ensure that the Operator must conduct an appropriate systematic assessment of noise and vibration emissions associated with the Permitted Activities on an annual basis. The NMP will be reviewed annually.

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5.5 Resource Utilisation

Water use

Recirculation of leachate and surface water may lead to a decrease in water use on site, and less water being taken off by tanker for disposal, however this has to be offset around concerns about elevated odour emissions.

Raw Materials Selection and Use

No change to raw materials selection and use because of this variation.

5.6 Waste Management and Handling

Waste Minimisation

The activity itself implements the waste hierarchy by prioritising recovery over disposal and represents an effective means of minimising biodegradable waste sent to landfill. The overall purpose of the activity is to produce a compost compliant with PAS:100 standard.

Waste Handling

Waste handling arrangements are considered appropriate to minimise emissions and ensure wastes are managed in accordance with the objectives of pollution prevention and control.

A condition has been included in the permit whereby compost material must be within the mesophilic range prior to being moved from the Maturation Shed to the Finishing Shed to minimise diffuse emissions to air.

Waste Recovery or Disposal

No change to waste recovery or disposal because of this variation.

5.7 Management of the site

Environmental Management System (BAT 1)

The Environmental Management System will be updated to reflect the changes on site from the proposed variation. All procedures on site are required to be reviewed and updated on a regular basis.

The operational processes for the sanitisation and stabilisation stages of the In Vessel Composting Activity that takes place on site will be updated.

The Operator has said all relevant staff will receive appropriate training in the management of the new technology at the site.

Accidents and their Consequences

As part of the application, the Operator provided an Incident Prevention and Mitigation Plan, however, it did not adequately address fire risks and consequences, specifically the containment of fire water. As such we have included a condition in the variation requiring an updated Incident Prevention and Mitigation Plan to be submitted by February 2027, post commissioning.

Closure

No changes to the closure to this variation.

5.8 Site Condition report

No change as a consequence of this variation.

5.9 Monitoring

Air (BAT 8, BAT 34)

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As indicated in the Odour section above, conditions have been included to require quarterly monitoring of air emissions including odour, starting three months after commissioning has been completed for the following year. Thereafter monitoring will be required every six months.

This monitoring will help the Operator develop a detailed emissions inventory associated with the In-Vessel Composting Activity in addition to providing assurance that the emissions limit values are being met.

Conditions have been included that require routine smoke tests to be undertaken in order to demonstrate building integrity and reduce the likelihood of diffuse emissions to air.

Water

There are no direct emissions to the water environment and no monitoring is proposed.

Soil and Groundwater

Soil and groundwater conditions are included in the permit to demonstrate that the infrastructure and procedures on site are effectively preventing emissions to soil and groundwater. A systematic assessment of measures used to prevent emissions to soil and groundwater is to be carried out by 31 December 2027 and 4 yearly thereafter. If the assessment identifies adverse impact, then the operator must outline what additional measures will be implemented to reduce the impact. This will be reviewed as part of regulatory effort.

Waste

The principal waste required to be taken off site for disposal are leachate and composted material that does not meet PAS:100 standard. Movement of these materials will be expected to be recorded under the requirements of the Duty of Care legislation.

5.10 Consideration of BAT and compliance with BAT-Cs if appropriate

Based on the information presented, whilst there remains some uncertainty, SEPA believe that the proposal meets the requirements of the waste treatments BAT-Cs and that the uncertainties are addressed through the inclusion of appropriate and reasonable permit conditions, thereby reducing the likelihood of environmental harm.

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? If yes, provide information on the action and justification below:	No
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Screening distance(s) used	2km
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Is there any other legislation that was considered during determination of the permit (for example installations that may be impacted by the requirements of legislation involving Animal By Products, Food Standards, Waste, WEEE regulations etc). If yes, provide information on the legislation, action and justification below:	No
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Officer	CO
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Applicant:
Permit/Application number:

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?	
N/A	
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?	
N/A	
Officer:	CO

8 Details of the permit		
Do you propose placing any non standard conditions in the Permit?		No
Do you propose making changes to existing text, tables or diagrams within the permit?		Yes
Outline the changes required and provide justification below:		
Proposed Condition Number:	Proposed Change:	Justification:
Interpretation of terms	Addition of new term – Commissioning	To provide clarity on meaning.
1.1.4.1	Delete and replace the STU details	Update of the STU to accurately reflect what activities are carried out on site. Some DAA have been moved to the STU.
1.1.5	(i), (ii) and (viii) have been deleted from this condition. Remaining DDAs have been renumbered (i) to (vi)	These deleted conditions have been moved to the STU to accurately reflect the STU on site.
1.2	Site plan has been deleted and replaced	Updated site plan with new infrastructure
2.3.1 to 2.3.3	Deleted and replaced	These have been adjusted to match the Table number in the permit.
Table 1	Rows deleted	No longer accurate
Table 1	Rows added	Details added to reflect new/updated conditions and timescales within the permit.
3.1	Condition has been deleted and replaced	Updated air emissions conditions have been added to the permit with emissions and monitoring table
3.3	Condition has been deleted and replaced	Odour conditions have been adjusted to ensure accurate monitoring of diffuse emissions and inventory of waste gas streams
3.4.5	Condition has been deleted and replaced	Systematic assessment of measures for preventing emissions to soil and groundwater to include new infrastructure which is subsurface
3.5	Condition has been deleted and replaced	Noise and Vibration conditions have been added to the permit with Noise Management Plan required and appropriate assessment of noise at sensitive receptors

Applicant:
Permit/Application number:

4.1	Condition has been deleted and replaced	Total Waste quantity and storage on site has been updated to better reflect the Permitted Activities.
5.1	Condition has been deleted and replaced	The Odour Abatement System has been updated in the IVC Activities and conditions ensure that it is maintained and functioning effectively.
5.2	Condition has been deleted and replaced	The upgrade condition added at a previous variation is no longer required.
6.1	Condition has been deleted and replaced	Condition has been renamed and updated to better reflect the STU and operation of the In-Vessel Composting Activity.
6.3	Condition has been deleted and replaced	This condition related to the previous In-vessel composting units and is now redundant. The new condition relates to the Commissioning Activities for the new In-Vessel Composting Activity. The conditions add the requirement for final commissioning report showing compliance to all conditions within the permit prior to composting operation.
Officer:	CO	

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?	No
Outline the changes required and provide justification below:	
There are no existing ELVs in the current permit.	
Officer:	CO

10 Peer Review	
Has the determination and draft permit been Peer Reviewed?	Yes
Comments made:	
Officer:	

11 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 <ul style="list-style-type: none"> 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), 	

Applicant:

Permit/Application number:

- 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.

12 Reference Documents

- **The Pollution Prevention and Control (Scotland) Regulations 2012**
- **Best Available Techniques (BAT) Reference Document for Waste Treatment Industrial Emissions Directive 2010/75/EU (Integrated Pollution Prevention and Control) 2018**
- **SEPA Odour Guidance – IND-G-011**
- **SEPA Guidance: Waste Composting – WAS-G-EASR-003**
- **Environment Agency Guidance: Monitoring stack emissions: techniques and standards for periodic monitoring**
- **Environmental Authorisation (Scotland) Regulations 2018 (EASR):**
From 1st November 2025, water, waste management, and industrial activities are regulated under Environmental Authorisation (Scotland) Regulations 2018. As this application was made prior to this date, it has been determined under the previous regulations.