Blancomet Scot Limited
Blancomet Scot Waste Recycling Plant

Permit Variation

PPC/A/1163107/VAR02

Contents

1 Non-Technical Summary of Determination

Provide a non-technical summary of the process and determination

Blancomet Scot Ltd currently operates a Recycling Plant in Pitreavie Business Park, Dunfermline, which is currently permitted under PPC/A/1163107 (as varied by VN01, VN02 and VAR01). The Plant processes Lead Acid Batteries, Catalytic Convertors, Ferrous and Non-Ferrous Metals and storage and processing of Waste Electrical and Electronic Equipment (WEEE).

This application is for a Substantial Variation (denoted Var02) to the company's existing permit (PPC/A/1163107) under the transitional arrangements in the Environmental Authorisation (Scotland) Regulations 2018 (as amended). This requires that any application received before 01st November 2025 is to be determined under the Provisions within the Pollution Prevention and Control (Scotland) Regulations 2012 and on completion will be assigned a notional determination date of 31st October 2025 in line with the EASR 2018 provisions. As such, the variation has been advertised in both the Edinburgh Gazette and the and subject to formal consultation with statutory bodies detailed in Section 2 below.

This variation was subject to pre-application discussion and covers request for an increase in WEEE waste types and quantities being accepted and includes a new activity of WEEE shredding, which will expand operations to accept hybrid vehicle batteries (NiMH) for testing, dismantling to component parts and additionally will formalise changes to European Waste codes (EWC) classification (regarding Wire Looms). During the pre-application discussions the applicant removed the request to store and treat electric vehicles (EV) lithium-ion batteries.

The variation was considered substantial as it involved the addition of a new process under the existing activity and required an increase in the amount and categories of WEEE waste to be taken into the site. This required both a technical and administrative assessment of the variation to be undertaken.

As part of the supporting information, a Revised Working Plan for the site has been submitted detailing waste acceptance procedures, processing methods and health and safety matters which includes the proposed times of operations and the restrictions thereon.

An addendum to the existing Site Conditions Report has been provided which details all substances used in the recycling plant these have been identified and assessed in accordance with SEPA guidance. Following pre-application discussions additional measures have been incorporated into the plant to contain any potential contaminants/Relevant Hazardous Substances. Noise and air emission assessments showed that noise from the Blancomet site is not a significant contributor to the noise climate in the locale, and the air pollution assessment showed airborne pollutants from the recycling operation at the site are at acceptably low levels. A revised financial provision expenditure plan has been provided to demonstrate that funds are available to cover a worst-case scenario where hazardous wastes require to be removed from the site.

Glossary of Terms

BAT - Best Available Techniques
BREF – Best Available Techniques Reference Document
BAT-C – Best Available Technique Conclusions
ELV – Emission Limit Value
CO – Coordinating Officer
EASR 2018 - The Environmental Authorisations (Scotland) Regulations 2018
NiMH – Nickel Metal Hydride
PPC 2012 – The Pollution Prevention and Control (Scotland) Regulations 2012
WEEE - Waste Electrical and Electronic Equipment

2 External Consultation and SEPA's response

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

Advertisement Check:	**Date**	**Compliance with advertising requirements**
Edinburgh Gazette	**21/11/25**	**Fully Complied**
Dunfermline Press	**20/11/25**	**Fully Complied**

Officer Checking advert: [redacted]

No of responses received	0

Summary of responses and how they were taken into account during the determination:

No Responses

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:	No response received within the consultation period
Health Board: [NHS Fife]	East Region Health Protection Service (ERHPS) for NHS Fife Health Board reviewed the public health risk acknowledging the potential local risk from dismantling of hybrid vehicle (NiMH) batteries and the wider risk from any fire at the site. They recommend that the site should seek advice from Scottish Fire and Rescue Service regarding measures to mitigate these risks. They concluded that potential exposure to the facility's emission, will not pose unacceptable risk to the residential receptors identified in the vicinity of the proposed facility provided the mitigation measures for the emissions are put in place as proposed and are appropriately monitored.
Local Authority: [Fife Council]	Fife Council Having reviewed their records pertaining to the permitted site they advise that there are no records of any complaints regarding the operation of the site and that given its distance to housing, they have no further comments to make.

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	17/06/2026
Date draft determination placed on SEPA's Website	17/06/2026
Details of any other 'appropriate means used to advertise the draft. Seek advice from the communication department	
Date public consultation on draft permit opened	17/06/2026
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: [redacted]	
Officer:	

3 Administrative determinations

Determination of the Schedule 1 Activity

There are no changes to the Schedule 1 activities listed in Section 1.1.3 of the permit

Shredding of WEEE waste is a listed activity under Section 5.4 Part A (b) iv treatment in shredders of metal waste, including waste electrical and electronic equipment and end-of-life vehicles and their components. It is an activity specifically linked to the recovery or a mix of recovery and disposal carried out at an installation with a capacity exceeding 75 tonnes per day or 27,375 tonnes per year. The Section 5.4 activity is not applicable to Blancomet as the shredding of WEEE waste is being solely introduced to reduce the physical size of the WEEE waste to reduce waste collections at the site which will lead to a reduction in the number of lorries visiting the site (reduction in noise and emissions from transport of waste to the recovery/disposal site). Furthermore, from the figures provided the amount of WEEE waste that could be shredded at the site would be far below the 75 tonne per day threshold required to be considered an activity the process is to be added as a Directly Associated Activity with the associated equipment incorporated into the Stationary Technical Unit.

Determination of the Stationary Technical Unit to be permitted

The storage facilities for both recoverable and damaged/off spec hybrid vehicle (NiMH) batteries and the shredding equipment will be added to the permit under condition 1.1.4.

Determination of Directly Associated Activities

The shredding of WEEE waste and the storage, testing and dismantling of hybrid vehicle (NiMH) batteries are additional Directly Associated activities to be added to the permit under condition 1.1.5.
Determination of Site Boundary
No Change to existing Site Boundary.
Officer: CO

4 Introduction and Background

4.1 Historical Background to the activity and variation

The site remained undeveloped up until the until the construction of the Edinburgh and Perth railway line which along with the upgrading of the A823 was the only major development in the locale until the late 1980's-early 1990's when the Pitreavie Business Park/Industrial Estate was built. Records indicate that the warehouse and associated infrastructure was built between 1993 and 1995 At the time was occupied by Simclar International Ltd undertaking Cable Manufacture. It is believed that operations were carried out within the warehouse utilising what is now the current peripheral infrastructure.

Although there may be contamination associated with the historical usages of the site, a site "ground" report obtained by Blancomet prior to its operations at the site indicated that the contamination at the site is not sufficient to designate the property "contaminated Land" within the meaning of Part 2A of the Environmental Protection Act 1990.

Blancomet operations began their waste recycling operations in 2015 and there is no material change to the existing Waste Treatment activities which processes Lead Acid Batteries, Catalytic Convertors, Ferrous and Non-Ferrous Metals and storage and processing of Waste Electrical and Electronic Equipment (WEEE).

This application is to vary the existing PPC permit to allow additional quantities and categories of waste to be processed at the site and to make an administrative change to certain European Waste codes (EWC) to better describe wastes relating to Wire Looms.

4.2 Description of activity

Blancomet operate an existing Waste Treatment Facility at the Pitreavie site licensed by SEPA through an "existing" permit issued under the PPC 2012 Regulations in 2018.

4.3 Outline details of the Variation applied for

The variation applied for allows the following changes to be implemented at the site:

An increase in WEEE being accepted, the inclusion of a new process of WEEE shredding, expansion of the categories of waste permitted on site to include hybrid vehicle batteries (NiMH) for storage, testing and where appropriate their dismantling into the battery's component parts.

The variation also includes an administrative change which will vary the permit to include the current European Waste codes (EWC) classification of wastes to better describe Wire Loom waste.

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

No

4.5 Identification of important and sensitive receptors

The nearest Site of Special Scientific Interest (SSSI) is Kincardine Marshes (≈ 6.4 km west). The Firth of Forth SPA / Ramsar lies ≈ 7.5 km to the south. Both sites are outwith the screening distance laid out in the SEPA PPC Nature Conservation guidance under which this application is made

The noise monitoring assessment identified three locations
Pitreavie Kindergarten (non-residential sensitive).

Adamson's Drinks Depot (commercial).
Whinnyburn Place (nearest residential façade)

These are the closest noise receptors to the Pitreavie site and the ones which have been agreed and historically the sites with the greatest potential to be impacted by noise generated from operations at the site

Officer:	CO

5 Key Environmental Issues

5.1 Summary of significant environmental impacts

The treatment and storage of hybrid vehicle (NiMH) batteries give rise to potential risks from fire due to faulty batteries. The site is not storing batteries within the process buildings; these will be stored tested and dismantled primarily within the yard area primarily in an abated and temperature controlled external container which is monitored by CCTV. Otherwise, there are no significant environmental impacts above those already accounted for on site.

5.2 Emissions to Air

Point Source emission to air:

An Air Emissions Risk Assessment (AERA) has been undertaken to assess the potential emissions from WEEE processing the report indicates that emissions from existing and proposed operations at Blancomet Scot Ltd are insignificant in terms of potential impact on local air quality and ecology. With the accumulated process contributions and predicted environmental concentrations (PCs and PEC) being well below the relevant Environmental Assessment Levels (EALs) and UK Air Quality Standard (2018).

Fugitive emissions to air:

All shredding operations will be carried out within the process building with suitable abatement. The biggest risk of fugitive emissions would come from a fire from faulty hybrid vehicle (NiMH) batteries which, although less prone to do so than Lithium-ion batteries, have the potential to catch fire, especially if damaged, giving off noxious fumes

Odour:

No Change

5.3 Emissions to Water

Point Source Emissions to Surface Water and Sewer:

No Change

Point Source Emissions to Groundwater:

Not Applicable

Fugitive Emissions to Water:

No Change

5.4 Noise

A Noise Risk assessment has been carried out for the proposed shredding activity at the previously identified noise receptors. The report concludes that with enclosure, dual-stage silencers, lined ductwork, vibration isolation, and with a "doors-closed" operation, the predicted rating levels at the sensitive receptor sites are at or below background during the daytime operation period (no shredding during early morning/night). The residual impact is assessed as "Low" under BS 4142, and offensive noise beyond the boundary is not expected. Under the noise management plan for the site, compliance will be demonstrated through commissioning and routine verification and where necessary corrective action will be taken to minimise noise impacts. The dismantling of hybrid vehicle (NiMH) batteries although carried out in the yard area and outwith the process building will be carried out manually and is not expected to significantly increase noise from the site

5.5 Resource Utilisation
Water use
No Change
Energy use and generation
The site energy use incorporates solar energy from solar panels
Raw Materials Selection and Use
As a Specified Waste Management Activity, the site has a robust working plan which requires that a waste acceptance criterion be in place such that it only accepts materials it can treat. Anything entering the site that is non-conforming or cannot be treated can be quarantined. The plan has been updated to include a section on the acceptance criteria regarding hybrid vehicle (NiMH) batteries.
5.6 Waste Management and Handling
Waste Minimisation
The introduction of WEEE shredding makes further recovery of valuable metals more efficient thereby and reduces the volume of waste produced on site and thereby reducing the number of waste collections required to remove WEEE waste from the site
Waste Handling
Measures have been proposed to address the issue of the potential for fire from damaged or faulty hybrid vehicle (NiMH) batteries. These will be identified, tested, and segregated as these pose potentially the greatest fire risk at the site. No hybrid vehicle (NiMH) batteries will be stored in the production building. There will be no change to the way wastes generated on site are handled. The operator has included a working plan and describes how dismantling of NiMH batteries will be either in the relevant storage container or a shelter erected adjacent to the storage containers. One of the issues raised during the pre-application discussions was the dismantling of batteries in a shelter. SEPA advised that to prevent rainwater ingress into the battery waste and minimise run off during the dismantling process the shelter should be three sided. Although Lithium-ion batteries can be handled on the site as part of the WEEE waste, the current permit does not authorise the dismantling of EV Li-ion batteries. As such, there are already measures in place to control fire risks from handling Li-ion batteries in the WEEE waste.
Waste Recovery or Disposal
Shredding of WEEE wastes leads to better recovery of metals at metal recovery sites leading to a reduction in residual metals being disposed of in the waste stream generated from PCB treatment. This improvement in metal recovery performance means that the amount of metal disposed of with the residual non treatable waste is reduced, leading to an overall reduction in fugitive emissions of Potentially Toxic Elements (PTE) from those wastes when they are sent for further recovery or ultimate disposal. The dismantling of damaged or faulty hybrid vehicle (NiMH) batteries leads to better recovery of metals and improved recycling by identifying the parts of the battery which are reuseable and those which require a recovery operation.
5.7 Management of the site
Environmental Management System
Blancomet hold ISO 14001 accreditation
Accidents and their Consequences
The existing accident management and mitigation plans for the site have been reviewed and updated to include the new process to be undertaken at the site. Hybrid vehicle (NiMH) batteries are widely reported to be a fire risk especially if damaged. The company has undertaken a fire risk assessment and has included details of the testing procedures to monitor the status of the hybrid vehicle (NiMH) batteries in storage to minimise any potential risk. The hybrid vehicle (NiMH) battery storage containers are to be fitted with CCTV to monitor the condition of the batteries and alert the operator to potential problems should they arise.

Closure

No Change

5.8 Site Condition report

The current site condition report has been updated to include the additional substances emitted from the proposed activities. The site currently has a baseline waiver in place which is understood to have been reviewed by SEPA in the 2023 BREF Review. As such, the shredding activities will take place under the same conditions as other operations on the site and pose no greater risk than those operations already being undertaken within the process building. The storage and dismantling of hybrid vehicle (NiMH) batteries outwith the process building is an inherently dry process dealing with sealed units. Any damaged batteries will be subject to further containment such that there is no increased risk of ground contamination. As a result, the extension of the baseline waiver to cover the additional waste types and processes covered by this application to vary the permit for the Pitreavie site is deemed appropriate.

5.9 Monitoring

Air

The current air emissions monitoring has been reviewed, and the proposed activities do not introduce any substances that are not already monitored for on site. The shredding of WEEE waste is carried out in the process building in a controlled manner with full dust abatement on extraction and venting systems. A new vent has been proposed and has been covered in monitoring reports submitted in the supporting information. This has been added to a new site emissions plan which shows the approximate location of all vents on the site and the monitoring tables have been updated to include the new vent in the monitoring requirements for the site. The applicant has been advised that SEPA should be informed once the vent is active and that the detailed site plans should be updated to include the new vent once its location has been confirmed and the vent installed. As the vent is already marked on the emissions plan there is no separate requirement to vary the permit. It has been agreed the operator can include any changes to detailed plans as an administrative change as part of the next variation.

Water

No additional monitoring requirements as the proposed activities do no introduce substances that are not already monitored for on site. The proposed battery activities involve the recycling of primarily sealed units (batteries or battery cells) and therefore it is not considered necessary introduce any additional monitoring requirements

Soil and Groundwater

No additional monitoring requirements as the proposed activities do not introduce substances that are not already monitored for on site. As for water above the sealed nature of the waste types does not pose significant additional risk of pollution.

Waste

Records will be updated to record the number of materials recycled.

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

The Blancomet site was subject to a BAT review under the 2018 Waste Treatment BREF and deemed to be compliant with the requirements of the Waste Treatment BAT conclusions. This BAT review was undertaken in late 2023. The current variation introduces WEEE shredding and it is the BAT assessment for this process which requires to be assessed. Blancomet have provided a full BAT against the requirements of the Waste Treatment BAT Conclusions, updating both the working plan and the various assessment to include the new process.

The main BAT C affected by the addition of the new process under this variation are as follows:

BAT 2 Procedures, onsite training, and mechanical sorting of wate streams has been updated to ensure the quality of the waste system.

BAT 3 The site condition and Baseline report has been amended to include the new WEEE shredding activity and contains an updated list of relevant substances and potential emissions.

BAT 8 The list of dust and metals/metalloids tested annually have been expanded where necessary and will be provided to SEPA as per the permit requirements

BAT 14 Works are undertaken as per the amended site working plan, processing works are undertaken within an enclosed building with approved ventilation and abatement equipment in place LEV and stack testing will include any new determinands

BAT17 &18 A noise risk assessment has been undertaken for the proposed shredding activity the report described several noise reduction measures to cover the use of shredding plant including enclosure, dual-stage silencers, lined ductwork, vibration isolation, and with a “doors-closed” operation.

BAT 21 The site operates under the approved working plan, which includes an accident management plan, fire safety plan and site security. This has been reviewed and updated to include the risks associated with WEEE Shredding

BAT 25 For the new process an Air Emissions Risk Assessment has been undertaken
BREF

BAT 28 A low speed, high torque shredder is utilised the high torque of the machine is suitable for the material being shredded.

BAT 29 Processing of WEEE is undertaken within the enclosed building, with appropriate ventilation and Annual Stack emissions testing is undertaken. Stack testing results are provided to SEPA Annually. As this involves a new discharge point an Air Emissions Risk Assessment has been undertaken and the results provided

BAT 40 Waste Acceptance Criteria has been reviewed and updated to include WEEE

Both the general measures in place at the site during the 2023 BAT review and the additional process specific measures adopted for the new shredding process appear to be in line with 2018 Waste Treatment BAT Conclusions thereby indicating that the site will be operated to BAT.

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**

There are no designated ecological sites within 2 km. The nearest Site of Special Scientific Interest (SSSI) is Kincardine Marshes (≈ 6.4 km west). The Firth of Forth SPA / Ramsar lies ≈ 7.5 km to the south. Consequently, the local environment is considered of low to moderate ecological sensitivity

Screening distance(s) used	2km

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).	**Yes**

WEEE Regulations:

This is a site which is proposing to Shred WEEE waste and dismantle hybrid vehicle (NiMH) batteries under a variation to their PPC waste treatment permit which had relevant WEEE compliance conditions

added to the permit through Variation VN02 issued 25/11/2021 and included a reference to WEEE shredding under condition 5.2.8 (d) which reads as follows:

5 2.8 All WEEE waste must be handled and stored in accordance with the following:

d) Residues from shredding or granulating of WEEE must be segregated in weatherproof areas and on an impermeable surface and in an area with sealed drainage.

The inclusion of sub condition d) to the permit through VN02 suggests that the shredding of WEEE waste may be carried out at the site subject to the addition of any process conditions.

Officer	CO

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:**
Schedule 1	Changes to scoping conditions to include updates to the Stationary Technical unit and Directly Associated Activities	Necessary addition of new associated activities and processes
Table 3.1	Changes to accepted waste quantities capacities and waste types	To facilitate the addition of hybrid vehicle (NiMH) batteries and general increase in the amount of waste allowed on site
Table 3.2	Changes and additions to the waste storage quantities and alterations to the EWC categorisation of Wire Loom waste	To facilitate the addition of hybrid vehicle (NiMH) batteries and general increase in the amount of waste allowed on site and to formalise changes to the EWC codes for wire loom waste
5.4	Change to section heading to read Lead Acid Battery Processing Operation	This section formerly read Battery Processing Operation and could have inferred that the section also covered the newly

		added hybrid vehicle (NiMH) batteries
5.8	A new section 5.8 is added to cover the Hybrid Vehicle (NiMH) Battery Processing Operation Conditions	The conditions seek to define the control measures to minimise the risks associated with hybrid vehicle (NiMH) battery processing
5.8.1 (5.8.1.1 and 5.8.1.2)	New Conditions relating to Hybrid Vehicle (NiMH) Battery Storage	Control measures to minimise the risks associated with hybrid vehicle (NiMH) battery storage
5.8.2 (5.8.2.1 to 5.8.2.4)	New Conditions relating to Hybrid Vehicle (NiMH) Battery Recycling (including testing dismantling and storage for dispatch)	Control measures to minimise the risks associated with hybrid vehicle (NiMH) battery recycling
Section 1.2a Site Plan	Incorporation of a new site plan showing the location of the hybrid vehicle (NiMH) battery storage containers	Updated site plan to identify the area associated with hybrid vehicle (NiMH) battery processing
Section 1.2b Site Layout Plan	Incorporation of a new site layout plan comprising separate layout plans for the two floors (Ground and First floors) of the warehouse/process building	Updated site layout plan to show the location of WEEE shredder and associated WEEE processing areas within the warehouse processing building which are split over two floors
Section1.2c	A new Site Emissions Plan	A previous permit variation removed the original Site Plan which showed the location of the emission points 1-4 (Air) and 1W & 2W (Water) which were numbered within the emissions tables in Schedule 6. The addition of the new emissions plan restored the ability to identify the location of the emission points in the monitoring tables in Schedule 6 and added emission point 5 for emissions from the WEEE shredding operation
Section 6.4	Deletion and replacement of Tables 6.1, 6.2, 6.3 and 6.4	These required to be updated to include the new emission point 5 covering emissions from the vent from the WEEE shredding 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:	

The site is undertaking a new process of WEEE shredding and acceptance of a new waste type. This requires changes to the monitoring tables to potentially add new determinands albeit existing levels and measures are unaffected.
Officer: [redacted]

10 Peer Review	
Has the determination and draft Variation been Peer Reviewed?	**Yes**
Comments made:	

23 April 2026
Suggested amendments to wording of proposed conditions saved and shared with determining officer. Section 9 above states "*changes to the monitoring tables to potentially add new determinands*" however the variation notice does not amend the monitoring tables. Also, the language used means it is unclear what consideration was given to new determinants, what the end view was and why. I would suggest this is clarified.

With reference to section 5.2 above, it is not clear what if any additional air emission points are associated with this variation?

CO response to questions raised

Contacting Fire Rescue Scotland (FRS)
The question was raised whether the CO had contacted FRS regarding the fire risks and measures taken to minimise the risk of Fire at the site.
A review of the pre-application correspondence identified that a key item discussed was the heightened risk of fire posed by handling processing and storage of Lithium-Ion batteries. These discussions included advice to the applicant regarding employing independent fire risk assessment specialists to advise on issues related to Li-ion batteries. The responses record that the applicant had taken measures to obtain advice from both industry and fire and rescue application. In April 2025, the working plan records that Blancomet had carried out an internal Fire Risk Assessment for the site which was updated in October 2025 by an independent specialist fire safety consultant following which the site working plan fire safety measures were updated to incorporate and include additional measures to minimise the risk of fire from the shredding of WEEE waste and the handling storage of NiMH batteries. A Copy of the report produced affirms that it was carried out to the standards required by current fire prevention legislation and guidance which centred around Fire prevention at the site as part of protection of the workforce in the first instance as they would be categorised as "those at highest risk." As the measures were proposed by specialist consultants and adopted by the site as being in line with current Fire prevention legislation/guidance and with the site being known to FRS then it was deemed not necessary to contact FRS

Clarification of Section 9 above
The processing of Nickel - Metal Hydride batteries (NiMH Batteries) is to be carried out within the yard area, and no batteries are to be processed within the process building. As this processing is to be carried out under cover but outdoors, there is no channelled emissions from the process which is inherently low emission or emission free unless there is an incident at which point there may be fugitive emissions.

Regarding emissions from the shredding of Waste electrical and electronic equipment (WEEE) this links to section 5.2 above as follows:

Section 5.2 Point Source emissions
The only activity in the current variation to be carried out within the process building appears to be the shredding of WEEE. However, conditions relating to the processing of WEEE have already been added

to the permit through Variation VN02 dated 25/11/21 [*as inferred in Section 6 above] and* as a result no new emission points are associated with the variation

This included the addition of the following conditions

1.1.3.3 The storage and treatment of Waste Electrical and Electronic Equipment excluding the WEEE containing ozone depleting substances.

5.2.8 All WEEE waste must be handled and stored in accordance with the following: listing details in sub conditions a to f This included controls on shredding residues as follows [mentioned in 6 above]

d) Residues from shredding or granulating of WEEE must be segregated in weatherproof areas and on an impermeable surface and in an area with sealed drainage.

5.7 Treatment of Waste Electrical and Electronic Equipment

5.7.1 WEEE must be treated using the best available treatment, recovery and recycling techniques

The air emission table [Table 6.2] was replaced in Var 01 issued 06/07/23

Table 6.2 – Emissions to Air Monitoring Requirements

Parameter	Emission Point Number	Spot Sampling		
		Standard	Frequency	Operational Mode
Particulates	1, 2 & 3	BS EN 13284-1	6 monthly	Fully operational
Metals	1, 2, 3 & 4	BS EN 14385	Annual	Fully operational
Sulphuric Acid	4	US EPA Method 8	Annual	Fully operational

As this variation followed the addition of WEEE conditions, this table should already include emissions generated from any WEEE shredding on the site so no changes are required to the emissions tables as there is essentially no additional process or DAA being added (providing the variation does not include further emission points being added). In summary, the emissions and the emission points are the same as those in place at the time of the VN02 and Var01 variations

It is undetermined as to whether WEEE shredding was carried out before the current variation, however the condition, added in a previous variation, regulating how the residues of shredding were to be handled and stored, infers that shredding is authorised. If this is simply a notification exercise to inform SEPA that WEEE shredding is now being undertaken the PPC regulations under which the current variation is being determined would debar this as Notification of change under regulation 45 due to the variation application [under Regulation 45 (4)]

(4) A change notice is not necessary if—

(a)the operator applies for a variation of the permit before a change in operation is made, and
(b)that application describes the proposed change.

Both limbs of 45(4) are met in this instance.

Additional Clarification during Informal operator consultation
The operator has indicated that there may be a requirement for further emission stacks for the WEEE shredding process and storage containers as outlined in their air emissions risk assessment report, the report identifies there will be abatement on the WEEE shredder extraction system with the NiMH storage containers fitted with passive venting. They report that any stack construction would follow the same principles as the existing stacks and can be fully incorporated into the existing testing regime. SEPA would record that as new emission points would require to be added to the permit, then the addition of

future stacks would require a further variation, the level of variation required would be based on the supplementary information accompanying that variation and once the full details of any proposed changes are provided.

Following further discussions SEPA confirmed that although the results of emissions modelling undertaken in respect of this variation, indicate that the discharges from the activities described in this do not result in any significant increase in emissions from the site, the position of the new vent/stack has been identified and marked on the new Site Emissions plan it is to be designed and constructed to the same specifications as the existing vents/stacks. As the emissions are to be conveyed to a discharge point, they become channelled emissions direct to air and the discharge point is required to be added to the permit.

A review of the permit (as varied) identified that there were no emission points shown on any plan, it seems that the original Site Plan, which showed the location of the emission points 1-4 (Air) and 1W & 2W (Water), was deleted in VN02 (an earlier variation). Although the location of the existing emissions points is contained within tables 6.1 through 6.5 in Schedule 6 of the permit, the incorporation of a plan showing the emissions points provides an “at a glance” pictorial reference to their location making it easier and quicker to identify the individual emission points at the site rather than having to refer to the details within the monitoring tables in Schedule 6 to identify their location.

Having looked at the additional information provided within the application and the clarification provided by the operator. A new vent had been proposed and was covered in monitoring reports submitted in the supporting information. The approximate location of this emission point has since been added to a new site emissions plan which also shows the approximate location of the existing vents on the site and following a review of the data provided the monitoring tables have subsequently been updated to include the new vent in the monitoring requirements for the site. The applicant has been advised that SEPA should be informed once the vent is active and that the detailed site plans (engineering style drawings) should be updated to include the new vent once its location has been confirmed and the vent installed. SEPA has noted the concerns raised by the operator regarding the need for a further variation to cover the addition of this vent not least as this substantial variation was predicated on the inclusion of that vent as part of the WEEE shredding operation. As the vent is now marked on the emissions plan and the emission point has been included in the overall monitoring programme for the site (inclusion as Emission Point number 5 in the Air emissions tables in Section 6.4) There is no separate requirement to vary the permit to include the new vent (as would have been the case had no such additional information or location information been provided and the vent been added later). What has been suggested is that once the location of the new vent/stack has been confirmed and the vent installed the operator should include any changes to the detailed (engineering drawing style) plans at section 1.2a or 1.2b in the varied permit, as part of any subsequent variation

Officer:	Spec I [inc CO response]

11 Final Determination

Issue of a Substantial Variation - Based on the information available at the time

Issue a Variation 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.